



March 19, 2015
File No. 87560.02

Mr. Wayne A. Wheeler, P.E.
Solid Waste Management Bureau
New Hampshire Department of Environmental Services
P.O. Box 95
Concord, New Hampshire 03302-0095

Re: Allenstown Transfer Station Facility
104 River Road
Allenstown, New Hampshire 03275
Type 1-A Permit Modification Application
Permit No. DPHS-SW-85-009

Dear Mr. Wheeler:

In response to the New Hampshire Department of Environmental Services (NHDES) technical review comment letter dated February 26, 2015:

A. Application

Comment: In section 3, the proposed approved design capacity would be 750 tons per day. The facility will average 500 tons per day, with a maximum daily tonnage of 750 tons per day and a maximum weekly tonnage of 3,000 tons. Env-Sw 102.09 defines "approved design capacity" as the average weekly tonnage to be received at the facility during the quarter in which the most waste is anticipated to be received.

The Department would prefer the facility permit state that the approved design capacity is 3,000 tons per week and the approved storage capacity (Env-Sw 102.11) is 500 tons. Please indicate if these limitations are acceptable or not.

Response: The Applicant would prefer the facility permit state that the approved design capacity is 3,000 tons per week and the approved storage capacity is 750 tons. The revised Application Form (Page 1 of 4) and the revised supplemental information is attached.

B. Closure Plan

Comment 1: Section 2 must include the "discrete" closure activities to be undertaken re: removal of MSW, C&D, Recyclables, any remaining fuel, drums, & other fluid containers, dumpsters, trailers, equipment, facility records, decommissioning of AST [if needed], litter pick up, etc. including the estimated length of time the activity will take.



Response 1: Section 2 has been revised to include the discrete closure activities and estimated timeframes for the activity. The revised Closure Plan is attached to this cover.

Comment 2: Section 3 should include stored waste oils from equipment on site, prohibited waste still on site, litter, etc. Also, there is no mention of white goods. Please include.

Response 2: Section 3 has been revised to include stored waste oils from equipment on site, prohibited waste on site, and white goods. The revised Closure Plan is attached to this cover. Revision to specific pages of the O&M Plan (Page 7) are also attached addressing waste oils from equipment on-site (Pages 7 to 14 are only provided due to a shift in text within the report);

Comment 3: Section 4 should either contain the Solid Waste Rule reference for a "Notice of Intent to Close", or include the text from the Rules.

Response 3: A reference to the Solid Waste Rule requirements has been provided in Section 4. The revised Closure Plan is attached to this cover.

Comment 4: Section 5 needs greater detail for MSW and if a portion of the C&D waste will be sent for recycling or only disposal (refer to Bestway Disposal Services/Belmont cost estimate), recyclables to a P/T or larger recycler. Waste fluids, special and hazardous wastes, etc. should also be included. In addition, include procedures undertaken by staff to remove and clean site.

Response 4: Additional detail has been provided under Section 5. The revised Closure Plan is attached to this cover.

Comment 5: Section 7 should include submitting AFR even if only operated for a portion of the last calendar year.

Response 5: Section 7 includes submitting an AFR. The revised Closure Plan is attached to this cover.

Comment 6: Section 9 – Closure Cost Estimate

- a. Please fill in the permitted amount, quantity SPR and Quantity Non-SPR columns as applicable.
- b. Estimate mentions BFI Hooksett facility, which is closed. Please revise.
- c. Please include costs from disposal destinations not owned by Casella Waste Management, Inc.
- d. There is a line item for the disposal of universal wastes, but the list of prohibited wastes in the Operating Plan includes universal wastes. Please explain.
- e. There is a line item for the disposal of bulky waste/white goods, but there is no mention of these wastes in the Operating Plan and very little is mentioned in the Closure Plan. Please explain.



- f. There may also be some small costs for waste fluids, etc. that were not included in the closure estimate. Please include.*
- g. The quantity of waste stored should be the same as the approved storage capacity as explained above. Please refer to the cost estimate submitted for Bestway Disposal Services/Belmont where the total quantity equals the approved storage capacity.*

Response 6:

- a. The facility does not receive Select Processed Recyclables (SPR). Non-SPR quantities have been provided;
- b. A current facility has been listed in the revised cost estimate;
- c. Costs from facilities not owned by Casella Waste Management of Massachusetts, Inc. have been provided in the revised cost estimate;
- d. Refer to Section 3.0 of the revised Closure Plan. Prohibited universal wastes are sometimes found during processing. Universal wastes encountered are stored in Gaylord boxes on-site and disposed of at an approved off-site facility.
- e. Refer to Section 3.0 of the revised Closure Plan. Revision to specific pages of the O&M Plan are also attached addressing bulky waste/white goods;
- f. Costs for waste fluids are included in the revised cost estimate;
- g. The quantity of waste stored is the same as the approved storage capacity on the attached revised cost estimate.

Should you have any questions, please do not hesitate to contact me at (603) 224-4182.

Sincerely,

NOBIS ENGINEERING, INC.

A handwritten signature in black ink, appearing to read "J. Christopher Adams".

J. Christopher Adams, P.E.
Director of Civil Engineering

Attachments

cc: David Allen, Casella Waste Management of Massachusetts, Inc.
Toni King, P.E., Casella Waste Systems, Inc.
Shaun Mulholland, Town of Allenstown



Waste Management Division

For Office Use Only:	
WMD Log #:	_____
Date Rec'd.:	_____
No. of Copies:	_____
Fee: \$ _____	/Check # _____

APPLICATION FORM FOR TYPE I MODIFICATION TO SOLID WASTE MANAGEMENT FACILITY PERMIT

pursuant to
RSA 149-M and New Hampshire Administrative Solid Waste Rule Env-Sw 315

SECTION I. FACILITY IDENTIFICATION

(1)	Facility name: Allenstown Transfer Station
(2)	Functional classification: <input checked="" type="checkbox"/> collection/storage/transfer <input type="checkbox"/> processing/treatment <input type="checkbox"/> landfill
(3)	Mailing address: 104 River Road, Allenstown, NH 03275
(4)	Permit number: DPHS-SW-85-009
(5)	Location, by street address and municipality: 104 River Road, Allenstown, NH

SECTION II. PERMITTEE IDENTIFICATION

(1)	Permittee/applicant name: Casella Waste Management of Massachusetts, Inc.		
(2)	Mailing address: 53 Pelham Road, Salem, NH 03079		
(3)	Telephone number: 603-485-2129		
(4)	If different than above, identify the individual associated with and designated by the permittee/applicant to be the contact individual for matters concerning this application:		
	(a) Name: David Allen	(b) Title: Market Area Manager	
	(c) Mailing address: 53 Pelham Road, Salem, NH 03079		
	(d) Telephone number: 603-543-7088	(e) E-Mail: david.allen@casella.com	

SECTION III. DESCRIPTION OF PROPOSED MODIFICATION

Describe the proposed modification by answering each of the following questions. Use additional paper as necessary.

(1)	Provide a BRIEF description of the proposed modification. [Check box if response is provided on separate paper <input type="checkbox"/>		
	The proposed modification is to maintain the approved design capacity of 3,000 tons per week and increase the approved storage capacity to 750 tons.		
(2)	Identify whether the proposed modification is a "type I-A" or "type I-B" modification. (If uncertain, use the worksheet provided with the instructions for this form): <input checked="" type="checkbox"/> Type I-A <input type="checkbox"/> Type I-B		
(3)	Identify, either below or on separate paper, each written permit condition that will require amendment to effect the proposed modification and provide draft language for the same. [Check box if response is provided on separate paper <input checked="" type="checkbox"/>		
(4)	Identify, below, each "last approved plan of record" identified in the permit which will be affected by the proposed modification and will therefore require amendment/revision:		
	Check here if affected	TYPE OF PLAN	DES APPROVAL DATE
	<input type="checkbox"/>	Facility design plans/specifications	
	<input checked="" type="checkbox"/>	Facility operating plan	9 Dec 2013
	<input type="checkbox"/>	Facility closure plan	
	<input type="checkbox"/>	Facility financial assurance plan	
	<input type="checkbox"/>	Other plan (specify):	
			WMD LOG # (Find this number on your copy of the approval)

TYPE 1-A MODIFICATION TO SOLID WASTE MANAGEMENT FACILITY PERMIT

Allenstown Transfer Station 104 River Road, Allenstown, NH

Section III. Description of Proposed Modification

- 3) Terms and Conditions (6) should be replaced with:
 - (6) **Facility Capacity and Storage Limits**
 - (a) The facility's approved design capacity is 3,000 tons per week.
 - (b) The facility's approved storage capacity is 750 tons.

Section VI. Impact Evaluation

- 1) The transfer facility will continue to function as it does currently, with no anticipated impacts to life expectancy or service area. The increase in permitted facility daily capacity will provide flexibility for acceptance of additional daily intake of municipal solid waste, construction demolition debris, and recyclables. Additional truck traffic at the facility is expected to be negligible. No change in facility layout or traffic flow is proposed.
- 2) No physical changes are proposed at the facility. The facility currently has sufficient capacity to manage the proposed solid waste and recyclable material volumes.
- 3) The proposed modification will not negatively impact the state's ability to achieve the goals and objectives specified in RSA 149-M:2.
- 4) The proposed modification will not negatively impact integrated waste management systems or their hierarchy as specified in RSA 149-M:3.
- 5) The proposed modification is consistent with the state solid waste management plan. The facility will continue to function as it does currently.

Section VII. Public Benefit Demonstration

- 1) The total quantity of waste that the facility transfers annually to New Hampshire landfills and incinerators is limited to the quantity of waste the facility receives annually from New Hampshire generators.
- 2) The facility separates and diverts recyclable materials to authorized facilities for reuse and avoids disposal of recyclable materials in lined landfills with leachate collection systems.



CLOSURE PLAN

Allenstown Transfer Facility
Allenstown, New Hampshire

Casella Waste Management of Massachusetts, Inc.

January 2006

Revision July 2014

Revision March 2015

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COST ESTIMATE

1.0 FACILITY IDENTIFICATION

This Closure Plan has been prepared to provide Casella Waste Management of Massachusetts, Inc. (Casella) with the necessary information regarding the closure of the *Allenstown Transfer Station* (hereafter referred to as the “Facility”). The following contact information is provided:

Allenstown Transfer Facility
Casella Waste Management of Massachusetts, Inc.
104 River Road
Allenstown, NH 03275
Tel: (978) 817 - 3361
Fax: (603) 870 - 9437
Attention: David Allen, General Manager

This plan has been prepared to allow a third party to implement and complete all required facility closure tasks in compliance with RSA 149-M, the permit and the NH Solid Waste Administrative Rules without further explanation or guidance. Reference is also made to Env-Sw 406; Env-Sw 900, Env–Sw 1006; and Env-Sw 1106. A copy of this Plan will be kept at the Facility.

The Facility consists of: a 13,000 SF transfer station building for sorting and processing MSW, CDD, and miscellaneous recyclables, a 4,500 SF office, a 4,700 SF maintenance garage building, a scale, and up to eight (8) transfer trailers.

The Facility is accessed via a paved driveway off of Suncook Valley Highway (Route 28) with a paved area for employee/visitor parking. The site is serviced by on-site sewage disposal, municipal water, and a closed stormwater collection system.

The Facility approved design capacity is 3,000 tons per week and the approved storage capacity is 750 tons per day.

2.0 CLOSURE SCHEDULE

Casella intends to continue operation of the Facility with no set date for closure of the Facility. This Plan and closure schedule will be revised by Casella, as needed.

Closure of the facility will include:

- Consolidation and loading of Municipal Solid Waste (MSW), Construction and Demolition Debris (CDD), miscellaneous recyclables, any remaining liquids, drums, and non-permissible universal wastes on-site. Consolidation and loading is anticipated to take up to 2 days;
- Removal of MSW, CDD, recyclables, and any remaining liquids, drums, or non-permissible universal wastes to processing or disposal facilities. Removal is expected to take up to 1 day;
- Removal of roll-offs, temporary trailers, and equipment. Removal of these components is expected to take up to 1 day;

- Decommissioning of 500-gallon diesel aboveground storage tank (AST), 250 gallon used oil AST, and 275 gallon heating oil AST. Decommissioning is expected to take up to 1 day; and
- Removal of residuals, litter, transfer of facility record documents, and security of the site. These activities are expected to take up to 1 day.

Closure activities listed above are anticipated to occur simultaneously (ie. overlap) and are expected to be completed within approximately 3 days of the commencement of closure.

3.0 WASTE IDENTIFICATION

Waste materials that may be accepted by the Facility include MSW, CDD, and miscellaneous recyclables. MSW is typically generated by residential, commercial, or light industrial sources and includes, but is not limited to, the following:

- non-recyclable paper, glass, metal, plastics, and rubber
- fabrics
- furniture
- household / domestic solid waste
- other non-hazardous solid wastes

CDD is typically the result of the residential and non-residential construction, remodeling, repair or demolition of structures. It includes non-putrescible waste building materials such as, but not limited to, the following:

- bricks
- concrete
- non-asbestos insulation or roofing shingles
- asphalt pavement
- furniture
- non-recyclable paper, cardboard, glass, metal, plastics, and rubber
- electrical wiring
- wood

Miscellaneous Recyclables typically include, but are not limited to, the following:

- paper
- cardboard
- glass
- metal
- plastics

Unacceptable waste materials that should not be brought to the Facility for disposal include, but are not limited to, the following:

- Bulky Waste/White Goods
- Hazardous wastes (as defined by Federal and NHDES Regulations)
- Untreated infectious waste

- Radioactive waste
- Sludge and septage waste
- Asbestos wastes
- Contained gaseous wastes
- Explosive waste
- CFC-containing appliances
- Liquid waste
- Batteries, mercury containing devices, computers, televisions or other universal or electronic wastes
- Other waste for which the Facility has not been designed or which may be detrimental or hazardous to the Facility, its operators or its users, or for which the Facility has no provisions for removal to a permitted facility or marketplace for re-use.

Unacceptable waste materials found in significant quantities during the inspection process are either rejected, loaded back onto the hauling trucks, or are segregated for recycling or disposal.

Small quantities of unacceptable waste materials that can be handled in a safe and secure manner at the Facility are segregated and staged for proper recycling or disposal. Unacceptable waste materials, present in manageable quantities, that will be handled at the Facility include but are not limited to the following:

- Bulky Waste/White Goods
- CFC-containing appliances
- Liquid paint
- Batteries
- Computers, televisions, etc.
- Gaseous waste tanks (empty)
- Tires
- Waste oils from on-site processing equipment
- Universal wastes

4.0 NOTIFICATIONS

Casella will notify the commercial users for MSW, CDD, and Miscellaneous Recyclables, via written letter of the intent to close the Facility. Casella will also inform the local public via legal notification in the local newspaper(s) and posted notice in at least three (3) public locations within the Town relative to the discontinuance/closure of the Facility. The notice of intent to close shall include:

- Facility identification;
- date the Facility intends to stop receiving waste;
- a copy of the Facility's approved closure plan or file reference thereto;
- if the provisions of the last approved closure plan of record are no longer applicable or no longer conform to the closure requirements of the solid waste rules, identification of such provisions and revisions in accordance with Env-Sw 315; and
- the date the Facility intends to commence closure activities.

5.0 CLOSURE REQUIREMENTS

Once proper notification has been made to all users and the Facility is no longer accepting any new waste, the following closure tasks will be initiated by Casella:

- transport all remaining material and debris from the processing building, garage, trailers, and offices to appropriately licensed solid waste processing, recycling, incineration and/or disposal facilities within the New England States;
- remove/dispose of all empty containers;
- disconnect/shutoff all utilities to the processing building garage, and offices, including water, electric, and telephone; and
- remove all Facility operational equipment from the processing building, garage, and offices, to an appropriate storage location.

6.0 POST-CLOSURE REQUIREMENTS

Due to the containerized/enclosed design of Facility operations, no impact to groundwater or surface water is anticipated; therefore a site monitoring program is not necessary.

7.0 RECORD KEEPING AND REPORTING

In accordance with Env-Sw 1105.14, Casella will file an annual report for “inactive facilities” relative to the Facility’s closure, to include:

1. Facility name, location, permit number;
2. permittee name, address and telephone number;
3. facility operator(s) name, address, certification number, and telephone number;
4. name, address, affiliation and telephone number of the person or persons responsible for managing all post-closure activities at the Facility;
5. status of the Facility, including: date the Facility discontinued receipt of waste; commencement and completion dates for all construction activities at the Facility related to the approved closure plan; and anticipated or scheduled date for completing all required post-closure monitoring or maintenance activities;
6. A summary and assessment of all environmental monitoring performed at or for the Facility, including:
 - a. Information concerning emergency events or other unexpected or unusual events at the facility relevant to assessing whether the Facility is achieving post-closure performance expectations; and
 - b. For a Facility having post-closure obligations, an evaluation of the available environmental monitoring data and other information pertaining to Facility conditions, including a statement by a qualified professional engineer identifying whether the Facility is achieving post-closure performance expectations and whether adjustments to the approved post-closure monitoring and maintenance

period and/or provisions are recommended in light of the performance evaluation.

All historical data relative to the past operations of the Facility and the Closure Plan will be kept at the Casella main corporate office in Rutland, VT.

8.0 OTHER PERMITS

There are no other local, state or federal permits and approvals required to implement Facility closure, other than the NHDES Solid Waste permit requirements.

9.0 CLOSURE COSTS

The attached closure cost estimate has been prepared with an approved storage capacity of 750 tons per day.

Facility Name: Allenstown Transfer Station
 Address: 104 River Road
 Allenstown, NH 03275
 NHDES Permit#: DPH-SW-45-009

Cost Estimate Form for Closure of Solid Waste Collection/Storage/Transfer Facilities or Recycling Facilities
 State of New Hampshire
 Department of Environmental Services
 Waste Management Division, Solid Waste Management Bureau
 29 Hazen Drive, PO Box 95, Concord, NH 03302-0095
 PHONE (603) 271-2825 FAX (603) 271-2456 EMAIL: solidwasteinfo@des.nh.gov
 TDD Access: Relay NH 1-800-735-2964

Complete this form in accordance with the NH Solid Waste Rules Part Env-SW 1400

Accepted and Stored Wastes	Quantity ¹ SPR ²	Quantity ¹ Non-SPR ²	Unit	Loading Cost Per Unit (Non-SPR)	Transport Cost Per Unit (Non-SPR)	Disposal Cost Per Unit (Non-SPR)	Total Cost Per Unit (Non-SPR)	Total Cost	Disposal Destination
Bulk, White Goods		10	Ton	\$5.00	\$10.00		\$15.00	\$150.00	Schnitzer, Concord NH
Bypass/Residual Waste			Ton						
C&D Debris		300	Ton	\$5.00	\$10.00	\$38.00	\$53.00	\$15,900.00	Re-Energy, Epping NH
CFC Containing Appliances			Gallons						
Chemical/Hazardous/Universal Wastes-Liquid			Ton						
Contaminated Soil/Media			Ton						
Escrap/CRTs			Ton						
Hazardous Universal Wastes-Solid			Ton						
Leachate			Gallons						
Mixed MSW/MSW/Non-Recyclable Wastes for Disposal		429	Ton	\$5.00	\$10.00	\$68.00	\$83.00	\$35,607.00	Turkey, Rochester NH
Non-Metal Unprocessed Recyclable Waste			Ton						
Tires			Ton						
Unprocessed waste		10	Ton	\$5.00	\$10.00		\$15.00	\$150.00	Rochester Materials Recovery Facility, Rochester NH
Unprocessed Recyclables commingled			Ton						
Other		1	Ton	\$5.00	\$10.00	\$320.00	\$335.00	\$335.00	Northcoast Services, Portsmouth NH
Universal Waste/electronics									
Site Cleanup (per approved Closure Plan)									
General								Total Cost	Name of Third Party Providing Estimate
Removal of waste and recyclable material, general site cleanup									Nobis Engineering, Inc.
Equipment Decommissioning								\$3,675.00	
Equipment Removal									
Building Cleaning								\$4,500.00	
Regrading									
Hydroseeding									
Other Waste Fluids								\$2,415.00	Clean Harbors, Bow NH
Miscellaneous Closure Work									
Administrative								\$1,500.00	
Other									
Miscellaneous Legal/Corporate									
								Sub Total	
								\$61,817.00	
								10% Contingency	
								\$6,181.70	
								Total*	
								\$67,998.70	
								\$2,720.00	
								Grand Total	
								\$70,718.70	

Note: The combined Quantity of Select Processed Recyclable (SPR) and Non-SPR must equal the maximum permitted storage capacity.

*Add the Costs for qualified professional oversight of all closure activities if the total closure cost estimate is more than \$50,000.

1A (SPR) is a recyclable material (a material composed of one of the following materials: paper, cardboard, glass, plastic, ferrous metal, non-ferrous metal, or textile materials) which has been physically sorted and separated by material type, formed into bales or otherwise physically processed or packaged in a manner satisfying the specifications for transportation to and acceptance by a market that will use the material (b) the production of certified waste-derived products. This closure cost estimate has been figured based on representative current market rates for having a third party perform all required closure and post-closure activities at the point in the facilities active life when the extent and manner of facility operations in compliance with permit conditions and applicable laws and rules are the most expensive, as indicated by the approved facility closure plan.

Signature of Preparer:  Date: 3/18/15

Signature of Permittee:  Date: 3/18/15

Date of Last Form Revision: 3/13/2015



OPERATION AND MAINTENANCE PLAN

Allenstown Transfer Facility
Allenstown, New Hampshire

Casella Waste Management of Massachusetts, Inc.

January 2006

Revision January 2007

Revision February 2013

Revised November 2013

Revised November 2014

Revised March 2015

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Appendix G – Procedures for the Handling of Refrigerant Containing Appliances
Appendix H – Incident Database (Odor Control Log)

4.1.2 CDD

CDD is typically the result of the residential and non-residential construction, remodeling, repair or demolition of structures. It includes non-putrescible waste building materials such as, but not limited to, the following:

- bricks
- concrete
- non-asbestos insulation or roofing shingles
- asphalt pavement
- furniture
- non-recyclable paper, cardboard, glass, metal, plastics, and rubber
- electrical wiring
- wood

4.1.3 Recyclables

Recyclables typically include, but not limited to, the following:

- paper
- cardboard
- glass
- metal
- plastics

4.2 Unacceptable Waste Materials

Unacceptable waste materials that should not be brought to the Facility for disposal include, but are not limited to, the following:

- Bulky Waste/White Goods
- Hazardous wastes (as defined by Federal and NH DES Regulations)
- Untreated infectious waste
- Radioactive waste
- Sludge and septage waste
- Asbestos wastes
- Contained gaseous wastes
- Explosive waste
- CFC-containing appliances
- Liquid waste
- Batteries, mercury containing devices, computers, televisions or other universal or electronic wastes

If unacceptable waste materials are present, the inspector will note it and report the information to the Scale House. Any material that cannot be handled at the Facility shall be rejected or separated and loaded back on the collection vehicle and removed from the Facility by the hauler. Small quantities of unacceptable waste materials that can be handled in a safe and secure manner at the Facility are segregated and staged for proper recycling or disposal. Unacceptable waste materials, present in manageable quantities, that will be handled at the Facility include but are not limited to the following:

- Bulky Waste/White Goods
- CFC-containing appliances
- Liquid paint
- Batteries
- Computers, televisions, etc.
- Gaseous waste tanks (empty)
- Tires
- Waste oils from on-site processing equipment

These materials shall be segregated and staged at the Facility in labeled containers located in designated areas protected from weather and precipitation. The staging areas are located to the west of the Transfer Station building.

When unacceptable waste material is brought to the Facility, the hauler is informed by Facility personnel that the material is not acceptable for disposal and receives verbal notification. If a significant quantity of unacceptable waste material is discovered after a hauler has left the Facility, the Scale House is notified and an attempt to identify and contact the potential source of the material (either the hauler or generator) is conducted by Facility personnel. If unsuccessful, the Facility will ensure that the material is managed according to all applicable environmental rules and regulations.

Universal and Electronic Waste Handling Procedures are included in Appendix F. Procedures for the Handling of Refrigerant Containing Appliances are included in Appendix G.

5.3 Acceptable Materials Handling

Upon determining that a load is acceptable, the CDD and MSW are partially compacted and pushed to the segregated areas of the tipping floor by the front-end loader to clear the tipping floor for other hauling trucks to offload. In the tipping areas, the sides of the building are protected concrete push walls. The push walls are of sufficient size and strength to stack materials if necessary and provide temporary materials storage before the materials are placed into the transfer trailers. The tipping areas will not be used for the long term storage of materials accepted by the Facility and will allow for the orderly offloading and transfer of solid waste to larger vehicles.

5.4 Transfer Trailer Loading

Single open top transfer trailers are used to transport material collected at the Facility for appropriate off-site recycling and/or disposal. The empty trailers are backed onto the recessed truck ramp adjacent to the tipping floor. Front-end loaders lift the waste from the tipping floor into the transfer trailer. An excavator is utilized to compact and maximize the load that is placed in the transfer trailer. When a MSW, recyclables or CDD transfer trailer is full, the driver places a tarpaulin over the load. The loaded transfer trailers are weighed at the Facility and/or at the trailer's destination point.

6.0 MAINTENANCE, INSPECTION AND MONITORING PROGRAM AND CONTINGENCY PLAN

The integrity of Facility operations is ensured through a program of routine maintenance, inspection, and monitoring. Key components of the program are described below.

6.1 Spontaneous Combustion Management

The possibility of a fire from spontaneous combustion is remote because materials that the Facility is permitted to handle are not volatile, and the daily movement of waste will prevent significant generation of combustible gases such as methane. The absence of combustible gases and the lack of long term storage within the transfer building greatly reduce the potential for spontaneous combustion.

6.2 Fire Protection and Hot Load Management

Hand held extinguishers are located both in the building and on each piece of equipment. There is the potential that a load may be delivered to the Facility which is smoldering or burning (hot load). If the burning is noticeable at the source at collection time, the loads are not picked up. However, if a hot load is transported to the Facility, the following procedures are implemented to properly manage it.

Typically, Facility personnel prepare a remote area of the tipping area or the backing apron for an identified hot load to be emptied. Facility personnel begin to extinguish the load with fire extinguishers and water the load down until the fire has been determined to be extinguished. Care shall be taken to use only the amount of water necessary to extinguish the fire so that excess water run-off can be avoided.

In the event that a hot load is emptied on to the tipping floor, Facility personnel immediately begin fire suppression with extinguishers and water. If the fire is extinguished, the load is then processed. If not, the loader then moves the load onto a remote portion of the backing apron, where it is handled as previously described. The Town of Allenstown Fire Department is notified if Facility personnel deem necessary.

In the event that a reportable fire does occur, the following are notified:

- Allenstown Fire Department 911
- Allenstown Board of Health (603) 485-4276
- NHDES Division of Solid Waste Management (603) 271-2925

The transfer facility is also equipped with a “rate of rise” temperature detectors that detects an increase in temperature which could indicate the presence of a fire. The detectors automatically contact the Allenstown Fire Department.

6.3 Litter Control

All solid waste transfer is accomplished within the transfer station. Loading and offloading in the tipping area mitigates the migration of litter and other particulate matter by significantly reducing the transfer operations exposure to wind and precipitation. To further minimize the migration of litter, a litter fence is located along the perimeter of the Facility grounds. Facility personnel perform daily inspection of the litter fence, Facility, and nearby section of Suncook Valley Highway (Route 28), River Road and Lavoie Road to collect litter, if present.

6.4 Vector Control

No solid waste materials are generated at the Facility other than office waste and domestic solid waste (e.g., lunch wastes) discarded by employees. MSW transfer operations including tipping and loading into transfer trailers are fully enclosed and waste is removed routinely, so there is no refuge or breeding area for vectors. Minimization of MSW accumulation, along with good housekeeping will reduce impacts from vectors. The Facility also retains the services of a vector control specialist to routinely bait, trap, and monitor the Facility and surrounding areas.

6.5 Odor Suppression

Specific odor control activities / actions implemented at the Facility include the following practices:

- MSW is handled inside the enclosed Transfer Building
- Potential odors are minimized by daily removal of waste from the MSW tipping floor
- Waste is raked out of building corners as necessary
- All incoming and outgoing loads are tarped

Should a load be determined to be particularly odiferous:

- The mechanical odor control system (misting system) located on the tipping floor will be activated
- Every effort is made to cover the odorous material with other waste materials if available
- Loading of material will be accelerated to move the material off-site as expeditiously as possible
- The delivering driver is instructed to exit the site as soon as possible after tipping
- The odiferous load is logged as such by facility personnel, in an attempt to proactively identify drivers / customers who often deliver such material

- Drivers / customers who have been noted as delivering odiferous loads will be instructed to inform the facility prior to bringing similar loads in the future to alert facility operators

6.6 Dust Suppression

All Facility access roads and parking areas are paved and swept as necessary, to control dust levels. Dust generation from the tipping floor is minimized because of the enclosed operations. Water is sprayed by hoses, as needed at the CDD tipping area, to minimize any dust generated by the offloading of CDD. The mechanical odor suppression system can also be activated as necessary for further dust control within the building.

Dust generated from MSW and recyclables transfer operations is typically low because of the moisture characteristics of the materials being handled.

6.7 Storm-water BMP Maintenance

Storm-water Best Management Practices (BMPs) are followed at the Facility to mitigate impacts to the environment from potential pollutants in storm-water run-off. The BMPs include structural measures such as catch basins with sumps and oil/water separators and operational measures, such as careful materials handling, sweeping and personnel training. A description of the Facility BMPs and their inspection and maintenance schedules can be found in the Facility's Storm-water Pollution Prevention Plan (SWPPP).

6.8 Facility Inspections

Facility inspections are completed on a monthly basis by Facility personnel. The inspections include all areas designated as sources of potential pollutants and evaluate the performance of existing Facility BMPs to identify areas that may require additional housekeeping and/or corrective actions. Inspections include the MSW, recyclables and CDD tipping and loading areas, equipment maintenance areas, materials staging areas, structural BMPs, and all exterior portions of the Facility. By inspecting on a regular basis, Facility personnel can address items as needed prior to a storm event and therefore mitigate the potential for adverse stormwater impact.

6.9 Equipment Inspection and Maintenance

Facility personnel that work in the waste handling areas are responsible for cleaning, inspections, and proper maintenance of Facility equipment. Regular preventative maintenance, as well as equipment repairs, is completed in the equipment maintenance areas at the facility by trained mechanics. Prior to commencing daily operations, the handling machinery shall be inspected for the following:

- fluid levels
- leaks

- staining
- overall cleanliness
- tires

6.10 Controls and Spills of Leachate

Leachate is controlled on the tip floor by absorption into waste received. In the unlikely case where this could not be done, speedy dry is used to absorb the excess liquid. The speedy dry is then scooped up and placed with other waste in the transfer trailer.

7.0 OPERATOR RESPONSIBILITY AND TRAINING

7.1 Employees and Job Descriptions

Division Manager

The Division Manager has ultimate responsibility of the Facility operation and all personnel.

Operations Manager

The Operations Manager has responsibility for daily operations and personnel management. The Operations Manager is responsible for maintaining accurate records of trucks utilizing the facility, materials accepted or rejected, BMPs and daily inspections. The Operations Manager reports directly to the Division Manager.

Dispatcher

The Dispatcher is responsible for scale operations and assists the Operations Manager with day to day recordkeeping. The Dispatcher identifies and records the materials hauled, including the date, time, type of material or waste and tonnage. The Dispatcher reports directly to the Operations Manager.

Equipment Operators and Waste Ban Inspectors

Equipment Operators are responsible for the operation of processing equipment, including loaders, excavators and other material handling equipment. The Equipment Operators are primarily responsible for the proper handling of solid waste at the Facility. As loads are emptied onto the tipping floor, the Equipment Operators also identify any unacceptable material as described in Section 4.2 above. The Equipment Operators are trained in the identification and handling of unacceptable materials to ensure compliance with waste ban regulation. Equipment operators work directly with the Dispatcher and report to the Operations Manager.

7.2 Organized Training

All personnel are required to become familiar with all of the operations manuals, equipment, maintenance and other Facility procedures, including this O&M Plan. The Division Manager is responsible for providing each employee a copy of the O&M Plan and providing an orientation of the Facility. New employees will be notified of the location of all posted notices, all manuals for

equipment, the employee safety plan and the schedule for collection and delivery of materials. Appropriate employees will be trained in the identification of unacceptable and hazardous materials.

Employees are provided one full day of training within their job capacity. Where it is relevant, the proper licensing by employees is required. At the end of the training, an employee will be tested on the specific equipment and site operations. The appropriate blocks of the Equipment Operations Qualification Sign-off Sheet will be filled out and initialed by the Division Manager. All employees have a 90-day review period where they are closely monitored and assisted if required. Subsequent training is performed on a monthly basis.

The facility shall have the appropriate personnel have certified operator training consistent with the requirements in Env-Sw 1005.07.

8.0 FACILITY RESPONSE PLAN

The Facility is designed to ensure continued on-going operations. It is unlikely that shutdowns would be required at this Facility. Equipment breakdowns could temporarily affect the operation of the Facility, however, Casella could utilize other resources in equipment and personnel if temporary operational needs arise. The Facility also has sufficient temporary storage, which ensures that there would be no measurable affects on operations.

Should an unforeseen incident occur impacting the ability of the Facility to operate on a normal basis, Facility personnel will follow procedures established in the Facility Response Plan.

9.0 RECORDS AND REPORTS

The Facility will rely on scale weight tickets to enable accurate and up-to-date record keeping for material collected at and transported from the Facility. The Facility Dispatcher will identify the materials hauled, including the date, time, type of material or waste and tonnage. This information will be used to prepare accurate and timely reports as required by the local Boards and the NHDES.

Any discharge or emission from a site which poses a threat to public health and safety, a danger to the environment or the creation of a nuisance, will be reported to the NHDES and the local Boards.

The facility will conform to Env-Sw 1005.09 for all incident reporting. The Facility will submit a written report of the incident within 5 working days after being made aware of a situation to the NHDES. A description of the incident will follow, including the date and time, the quantity and type of waste materials involved, and the measures employed to contain the release caused by the incident. An assessment of the potential hazards to the environment, safety and human health will be evaluated and an assessment made on how to prevent a recurrence of the incident.

Should the need for out-of-state recordkeeping arise, the Facility will conform to Env-Sw 1005.10 which will include the name and address of which the material originated from, the date of delivery and the total number of tons being delivered to the facility.

All facility operating records will conform to Env-Sw 1105.06 where all phases of operation will be documented including the location and telephone numbers associated with the facility, identification of all facility operators by name and certification number; and the quantity, type and destination of all wastes generated by the facility. A record of all inspections, maintenance, and repairs will be completed along with a record of all accidents, violations, complaints and all remedial and emergency response actions.

All reporting requirements by the facility will be performed in accordance with Env-Sw 1105.07.

During the active life of the facility, the Facility will annually communicate with the town of Allenstown in accordance with Env-Sw 1105.12 to ensure that the operating requirements established by the Town are being met by the facility, and to ensure that the facility operations meet other relevant planning needs and requirements identified or established by the Town to the extent allowed by the permit.

The facility shall report to the Department of Environmental Services, Waste Management Division, in writing, complaints made by abutters or other third parties which involve operating conditions or practices having potential to adversely affect human health safety, environment or which involve a recurring or persistent nuisance situation such as noise, litter, odor or vectors. These activities satisfy the requirements of Env-Sw 1005.09(d).

The facility will refer to Env-Sw 1105.13 for reporting all waste received during the reporting year. The facility name, location, telephone numbers, and permit number will be displayed along with the name and certificate number of all facility operators. The report will include, but not limited to, the status of the facility, the quantity, type and source of all waste received, with out-of-state waste tonnage listed separately and totaled.

10.0 CLOSURE PLAN

In the event of closure, the Facility will be decommissioned in a manner as to affect no adverse impact to Facility customers, the community or the environment. The Facility will be closed in accordance with applicable regulations and in accordance with the Closure Plan, revised July 2014. Upon completion of the Facility closure, the NHDES and the Allenstown Board of Health will be notified in writing.

11.0 DOCUMENT CONTROL

This O&M Plan is a controlled document. All revisions to the O&M Plan are recorded on the Revision Tracking Sheet located in the beginning of the O&M Plan. All recipients of the O&M Plan are recorded on the Revision Tracking Sheet and on the Distribution Information Sheet. Both of these sheets are included as Appendix C of this O&M Plan.

Each change to the O&M Plan is recorded as a revision. Each revision is assigned a unique, two digit revision number (i.e. 1.0). The first digit identifies the revision as a major revision to the

O&M Plan. The second digit identifies the revision as a minor revision. The tracking sheets will be updated with every revision as necessary.

12.0 EMPLOYEE SIGN-OFF

Each employee of the Facility is required to thoroughly read this document and sign and date the Employee Sign-off Sheet, provided as Appendix D of this O&M Plan.