

Ruggiero Processing Facility



Section VII Operating Plan

Permit No. DES-SW-SP- 12-001

Prepared for:

Ruggiero Processing Facility, LLC

P.O. Box 434

Saxtons River, VT 05154

November 2010

revised thru July 10, 2014

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Section 1.0 Facility Information

1.01. Facility Contact Information

The Facility name, location, mailing address and property owner are as follows:

Name: RUGGIERO PROCESSING FACILITY
Location: Industrial Park Road, Walpole, NH
Mailing Address: Ruggiero Processing Facility, LLC
P.O. Box 434
Saxtons River, VT 05157

1.02. Facility Type

RUGGIERO PROCESSING FACILITY (hereafter RPF) is categorized by the State of New Hampshire Department of Environmental Services Waste Management Division (NHDES-WMD) as a commercial facility for the collection, storage and transfer of solid waste as defined by Env-Sw 102.35. The term includes “transfer station” as defined by Env-SW 104.54 and “recycling facility” as defined by Env-Sw 104.20. Storage of recyclables will occur either inside the building or outside in covered containers.

1.03. Facility Capacity

The Capacity of the facility is not subject to a fixed daily maximum throughput. Facility processing and storage capacity is restricted so that the “average weekly tonnage received at the facility (during the quarter in which the most tonnage is anticipated and received), shall not exceed 200 tons.” The waste storage capacity of the facility will not exceed 90 tons. Maximum quantity of processed recyclable material in storage at any one time is 33 tons. Maximum quantity of municipal solid waste in storage waiting to be trucked off site for proper disposal at any one time is 30 tons.

1.04. Facility Service Type

The facility is a collection, storage and transfer facility, operated on a commercial basis and includes the recycling and transfer of material hauled by:

- Local Waste Haulers
- Occasional residents, whose load consists of construction and demolition debris.
- Local contractors

RPF accepts non-recyclable materials and various recyclable materials that are appropriate for recovery and re-use. All recyclable and non-recyclable materials are transported off site to facilities authorized to accept the respective materials.

Municipal Solid Waste, MSW, is also accepted only for transfer from small bulk container to larger bulk containers which then haul the repackaged MSW to approved final disposal sites at a lesser trucking cost.

1.05. Facility Service Area

The facility service area includes southwestern and central western New Hampshire and spot markets with an unlimited service area as defined by Env-Sw 102.37. RPF services commercial, municipal and occasional residential loads.

1.06. Facility Permittee, Operator, and Property Owner Information

Permittee and Operator:

Ruggiero Processing Facility, LLC
P.O. Box 434
Saxtons River, VT 05157

Property Owner:

same

Section 2.0 Authorized and Prohibited Materials

2.01. Authorized Waste

- Recyclable materials including glass, aluminum, steel cans, paper, high density polyethylene (HDPE) and polyethylene terephthalate (PET) plastics, and metal, as defined by Env-Sw 104.19; and
- Construction/Demolition debris as defined by Env-Sw 102.42.
- Municipal Solid waste, MSW, as defined by Env-Sw 103.46.

2.02. Prohibited Waste

- Hazardous waste;
- Sludge or septage waste;
- Asbestos waste;

- Infectious waste;
- Contained gaseous waste;
- Universal waste batteries (except for incidental lead-acid batteries);
- 55-gal drums or other liquid containers (except for five gallon or less empty containers incidental to the load);
- Explosives;
- Ash;
- Mercury containing devices;
- Liquid waste; and
- Other wastes not otherwise authorized by condition 6 of the permit.

Section 3.0 Routine Operations Plan

3.01 Hours of Operation

The facility is open to receive recyclables, non-recyclables, and MSW six days per week within the following hours:

Monday through Friday:	7am to 5pm
Saturdays	7am to noon

Hours of operation, which may be less extensive than those allowed by its DES permit, are prominently displayed on the facility entrance sign.

3.02. Access Control and On-site Traffic Patterns

Appendix A provides a site plan for the facility, which, in addition to general site features and layout, shows the location of the following: entrance, access road, turn-around area, hot load area, recyclables storage, unloading/recycling building, and container storage areas.

The following site security measures are provided to minimize the potential for unauthorized access to the facility in accordance with Env-Sw 1103.03 (as a result, locking gates are not necessary).

- On site facilities are locked during non-operating hours.
- Weather resistant signs, which indicate that access is restricted, are posted around the perimeter.

- Vehicular entrances are gated and locked during non-operating hours.

The off site administrative office provides record keeping and filing space. The recycling facility consists of a 50' x 100' steel building with a concrete tipping floor. Areas are designated for material discharge, storage and a trailer loading area. Access inside is maintained at all times for fire protection via a lockbox located at the main gate.

3.02(1). Incoming Traffic – Loading

Incoming collection vehicles enter the facility from Industrial Park Road, off Route 12 via a gravel entrance. Vehicles back up into the recycling building onto the concrete tipping floor where they discharge their loads. After discharge vehicles leave the building through the same door and exit the site back to Industrial Drive.

3.02(2). Outbound Traffic

3.02(2)(a). Non-recyclables

Empty open-top transfer trailers enter the site via the main entrance. The driver backs up to the loading tunnel (lower slab of building), where the roll off dumpster is loaded. They then proceed to the facility entrance/exit onto Industrial Drive and back onto Route 12.

On occasion, it may be necessary to temporarily store a loaded trailer in the staging area or loading tunnel before being transported off site. While unusual, storage may be over night, but in no instance will the staging period exceed one week.

3.02(2)(b). Recyclables

Empty roll off containers are generally filled with recyclable material and covered before being transported to end users or secondary material markets.

3.02(2)(c). Municipal Solid Waste

Fully enclosed waste hauling transfer vehicles will enter the site via the main entrance and proceed to the building. The driver backs up to the tipping floor and dumps their load. They then proceed to the facility entrance/exit onto Industrial Drive and back onto Route 12.

On occasion, it may be necessary to temporarily store a loaded trailer in the staging area or loading tunnel before being transported off site. While unusual, storage may be

over the weekend, but in no instance will the staging period exceed 72 hours.

3.03. Materials Acceptance, Inspection and rejection procedures

Each customer is required to provide information regarding the type and source of recyclables, non-recyclables, and MSW brought to the facility. A sign posted at the entrance to the facility lists prohibited waste.

Upon arrival at the site, the information is collected per section 3.4 below by the attendant. Should any wastes arrive from out of State, the attendant determines whether there are public benefits as defined by section 405.04(1) below. Finally, he categorizes the type of materials into either: non-accepted materials, construction/demolition debris, recyclables, or MSW.

Once information has been taken, the vehicles are turned and backed into the building where the load is tipped onto the concrete floor. The material is visually inspected; metal, concrete, wood and other recyclable/re-usable materials that are appropriate for recovery are separated by hand and/or by use of wheeled heavy operating equipment, such as a Bobcat or front end loader (herein after, a WFL).

The non-recyclables are pushed to the rear of the building by a WFL to clear the floor for the next load. An open-top transfer trailer is positioned in the loading tunnel to receive non-recyclable materials as it accumulates. The trailer is top loaded and material compacted as necessary by a WFL. When the trailer is full, it is secured and removed from the tunnel for transfer per 3.02(2)(a) above.

Facility operators have been trained to identify and properly manage materials not meeting facility acceptance requirements. The process used to manage unauthorized material is described in Section 6.1.6.

3.04. Incoming Materials Quantity and Source Determination

The facility uses cubic yard measure to determine all incoming vehicles hauling either recyclables, non-recyclables, or MSW. The following is recorded for each load: cubic yards, generator name and address, hauler name and address, truck number or license number, type of recyclable or non-recyclable material, date and time.

The attendant logs this information into the facility's tracking and billing system and prints a ticket for the load, which in turn, is signed by the vehicle driver. The driver retains the signed original; the facility retains a copy for its records in accordance with section 8.

3.05 Outgoing materials – Quantity and Destination Recording Procedures

Similar to the incoming vehicle procedures, all outbound materials are measured in cubic yards before exiting. Prior to leaving the site, the truck is stopped and data is collected and entered into the tracking and billing system. A ticket is printed that indicates the cubic yards and type of material being transported off site. For recyclable loads, the type and cubic yards of the recovered material and information regarding the secondary material market is also recorded.

The RPF facility sends recyclables to authorized facilities for re-use; disposal of recyclable materials in a landfill is avoided. The operator maintains accurate records of all material transported to authorized disposal facilities or secondary materials markets located in New Hampshire, or out of state. These records are maintained in accordance with requirements described in section 8 and are identified in the DES annual facility report which RPF prepares and submits for the previous year's operation.

3.06 Storage Time and Capacity Limits and Monitoring Procedures

All incoming materials are actively managed in a manner that minimizes the quantity of non-recyclable material stored on site at any one time to a maximum of 45 tons.

Recoverable materials are separated and temporarily stored either inside the 5,000 square foot recycling building or outside in roll off containers. Maximum quantity of the processed recyclables material in storage at any one time is 33 tons.

Pursuant to Env-Sw 405.03(a) and (b), material will not be stored for a period of time which results in adverse affects to the environment, public health or safety. Furthermore, materials are stored in a manner to permit local fire fighting response capabilities in accordance with Env-Sw 404.05(d).

Any/all putrescible and other non-recyclables will be loaded into open top transfer trailers throughout the day and will normally be transported to a permitted disposal facility on the day that it is received a the facility.

When it is not possible to transport the materials to the disposal facility within that facility's daily operating hours, it may be temporarily stored on the recycling building tipping floor or in a transfer trailer and transferred off site before producing noticeable odor. In no case shall the waste be stored greater that one week of its receipt.

3.07 Collection, Processing, Storage, Transfer and Off-site Disposal

Material will be inspected as it is being deposited on the tipping floor. The operations staff will visually inspect the material during the process of spreading and removing recyclable material to ensure that unacceptable materials as defined in section 2.2 are not present.

Any unacceptable wastes encountered will be managed in accordance with Section 6.1.6 Contingency plan. All other materials are managed as follows:

3.07(1). Recyclables

Recyclables are segregated and managed according to the following procedures to preserve value. All reasonable measures are taken to segregate recyclables from non-recyclables to ensure that they are diverted from landfill disposal in accordance with Env-Sw 405.04(2).

Recyclables will be stored temporarily (working storage) inside the recycling building (*see C-1 Site Plan, subject to minor changes*); the materials are ultimately transferred outside to their respective roll-off containers for storage prior to transport off site.

3.07(2). Masonry & Concrete Products

Brick, masonry products and concrete are stored in roll off containers located outside but near the recycling building. (*See Appendix A – Site Plan*).

3.07(3). Metal

Ferrous and non ferrous metal and wire are separated and stored outside in a roll off container and transported to a metal reclamation facility when the container is full.

Aluminum is segregated and may be processed through the horizontal baler prior to its transport off site to the reclamation facility. The aluminum is temporarily stored outside in a roll off container.

3.07(4) Wood

Clean wood is stored outside in a roll off container.

3.07(5) Non-Recyclables

As described in section 3.04, once the recyclable materials are removed, the remaining materials are handled as non-

recyclables and temporarily stored in open top transfer trailers, which are covered and secured when properly filled to capacity.

3.07(6) Municipal Solid Waste

MSW will be trucked to the site, dumped on the tipping floor, and recyclables will be removed. The remaining MSW will then be put into larger dumpsters and hauled to an approved disposal facility.

Section 4.0 Residuals Management Plan

4.01. Type and Quantity of Residuals

RPF generates the following residual materials requiring special management:

- Moisture that may drain out of materials deposited on the tipping floor.
- Liquids from the trailer loading tunnel. Quantity of liquids accumulated will vary depending on the mix of incoming materials.
- Non-recyclable materials. Volume will vary depending on incoming materials and respective market opportunities.

4.02. Residuals Management Procedures

The following is a brief description of the methods and procedures used by RPF to address each of the respective residual streams:

4.02(1) Moisture from waste

Moisture entrained in the materials is normally absorbed as the material is spread, separated and compacted on the tipping floor.

On inclement days with significant precipitation, some liquid from the material may accumulate on the tipping floor. If this occurs and the volume exceeds that which can be absorbed in the spreading and compacting process, sawdust or other absorbent material is spread and used to absorb the liquid. This material is then mixed with the non-recyclable material and shipped off site for disposal.

4.02(2). Liquids from the trailer loading tunnel

The recycling building is equipped with a floor drain and a 1000 gallon liquid holding tank to collect liquids from the trailer loading tunnel.

The holding tank meets the design criteria of Env-Wm 402 of the Permit and Registration Rules, and will be registered with NHDES Groundwater Discharge Drinking and Groundwater Bureau. (*See Appendix B*) It is equipped with visual and audio signal alarms, which are activated once the level reaches the maximum water depth.

The liquids are emptied on a regular basis and transported off site to a local municipal wastewater treatment facility for treatment and disposal.

4.02(3). Non-recyclable Material

The non-recyclable materials are segregated from the incoming materials and managed as described in Section 3.07.

4.02(4). General Shop waste

All internally generated waste and/or recyclable material are incorporated into the respective management procedures outlines above.

4.03 Waste Disposal

In accordance with Env-Sw 1105.10, the facility will maintain access to a minimum of two authorized disposal locations (*See Appendix C*) which are permitted to dispose of the expected quantity of non-recyclable materials:

- Site One: Keene, NH
- Site Two: Bellows Falls, VT
- Other permitted and authorized facilities, as necessary, to ensure that non-recyclable material is efficiently processed through the facility.

Similarly, agreements (*See attachment C*) will be maintained at a minimum of two locations for disposal of the liquids from the liquids holding tank: Keene WWTP & Bellows Falls WWTP.

4.04. Quality Assurance/Quality Control Provisions

RPF and authorized disposal facilities regularly communicate regarding acceptable and prohibited materials. Facility operating staff are trained in identification of prohibited materials; these procedures are followed by all facility operating staff.

Section 5.0 Facility Maintenance, Inspection and Monitoring Plan

Facility operating and supervisory staff are trained pursuant to Section 7.0. During facility operation, staff are alert to potential situations that may require their immediate attention and to ensure safe operating conditions and prevent adverse situations as noted in the following sections:

5.01. Spontaneous Combustion

The possibility of spontaneous combustion is limited since incoming materials are actively managed and do not include volatile materials. In addition, the materials are generally transported off site daily as described in Section 3.07. Finally, the building is metal framed with a concrete floor and steel siding, designed and constructed to limit the potential of fire.

An automatic fire detector will be installed inside the recycling building, should a fire occur during operating hours, the owner is immediately contacted, and if no answer is detected, the Walpole Fire department is automatically called to ensure immediate response.

In the unlikely event of a fire, procedures as outlined in Section 6.01(2) will be followed.

5.02. Other Fire Hazards

Although unlikely that a "hot" load would be delivered to the facility, all drivers are encouraged to take immediate action in the event of a fire or other safety concern. All drivers are instructed to immediately contact the RPF office and building attendant so assistance can be provided.

RPF personnel will be prepared for the arrival and manage the load once it arrives. Procedures as outlined in Section 6.01(3) will be followed.

Once controlled, an assessment will be made prior to discharging the load to determine the immediate need to notify and request assistance from the Walpole Fire Department.

Should a fire occur inside the building, the procedures described in Section 6.01(2) will be followed.

5.03. Vector Control

The facility is operated to minimize the potential for vectors. Recycling and transfer operations occur within the enclosed building. Other than during inspection and processing on the tipping floor, all non-recyclable materials are containerized into open top transfer trailers and covered by a tarp upon being filled to capacity. Materials are actively removed so that the potential for vectors is minimized.

RPF staff will regularly inspect the facility for vectors and will retain the services of a licensed pest control company to ensure that vectors do not become a problem.

5.04. Methane, Hazardous and/or Explosive Gas Generation

Any putrescible material will be removed from the facility before anaerobic decomposition can generate methane, hazardous or explosive gases.

Hazardous and/or explosive gases are not accepted or managed by the facility; liquids and gaseous wastes are prohibited.

5.05. Odors

The facility operations are conducted inside an enclosed building. In accordance with the operating permit, storage capacity and times are limited as presented in Section 3.07. Since non-recyclable material and MSW are typically transported off site daily, the potential for odor generation will be minimized. Recyclables are transferred off site as containers are filled. Adherence to the facility operating procedures generally prevents and/or controls odor issues.

The facility is located on approximately 6 acres and operated in a manner consistent with applicable NH Solid waste Regulations. Although odor generation is minimized, RPF will investigate the potential source in the event off site odors are detected and, if facility related, adjust operations accordingly. (e.g., apply odor neutralizing agents, arrange faster transfer, and check proper load tarping).

5.06. Dust

The majority of on-site travel surfaces are gravel. The areas potentially contributing to dust generation are the access road and turn around areas.

The site is located in an isolated area in a part of a former sand and gravel pit. The location provides that impact of dust off site will be minimal.

5.07. Windblown Litter

Material transfer operations occur within the building.

Most vehicles using the facility will be self contained packers and roll off trucks. Drivers are instructed to keep loads covered until they reach the turn around area to reduce the potential for litter generation.

To ensure that litter is properly managed, facility operational staff will inspect the site daily and collect litter or debris found. This material will be placed with other incoming material in the recycling building and processed accordingly.

5.08. Leachate

Section 4.0 Residual Waste management, describes procedures that are used to manage any liquids collected from materials that are processed at the facility.

5.09. Spill Management

Spills are managed in accordance with Section 6.01(5) Contingency Plan.

5.10. Storm Water Management

Storm water is generally managed as sheet flow from gravel surfaces and ultimately infiltrates into vegetated areas.

Storm water from slabs in building will be collected with floor drains and piped into the holding tank.

Section 6.0 Contingency Plan

The following contingency plan for Ruggiero Processing Facility discusses the potential emergency conditions, respective likelihood for occurrence and appropriate response to be taken by staff in an event.

Because of the no-toxic, non-hazardous nature of materials received at the RPF, emergencies of any kind are unlikely. Notwithstanding, several precautions and procedures are in place to assure appropriate responses in the event of a release or accident. RPF has designated an Emergency Coordinator and Alternate Emergency Coordinator who assist in managing response activities should any of the following emergency situations occur at the facility.

In addition, RPF has posted emergency phone numbers in the recycling building and on the lock box at the main gate.

6.01 Emergency Planning

This plan describes the actions to be undertaken in response to the following:

- Severe storm
- Fire/Explosion
- Hot Loads
- Medical emergency
- Chemical spills
- Unacceptable waste

6.01(1). Severe Storm

The operations staff evaluate whether early closure of the facility is warranted. If the daily operation cannot be completed in time, the building and all vehicles will be shut down and secured until operations are safe to resume.

6.01(2). Fire/Explosion

The facility does not store any petroleum or other combustible products; therefore the likelihood of a fire or explosion is low. However, to assure full preparedness, hand-held fire extinguishers are located neat the entry to the recycling building.

The materials unloaded inside the recycling building are managed in accordance with Env-Sw 404.05(d) (3). Access is maintained at all times in the event fire services are necessary.

Water supply in the event of a fire is off site via emergency vehicles.

Site personnel are trained to notify the fire department in the event of a fire and to use the appropriate fire extinguishers until the fire department arrives. A lock box system is provided to ensure that the fire department can always access the building.

Finally, an automatic fire detector alarm will be installed in the recycling building; should a fire occur during non-operating hours, the owner and Walpole fire department are automatically called.

6.01(3). Hot Loads

Hot loads which inadvertently arrive at the entry are managed immediately by on site personnel with assistance from the Walpole Fire Department (911) if needed. Upon arrival, drivers are instructed

to immediately contact the RPF office. An assessment will be made to determine the immediate need to notify and request assistance from the Walpole Fire Department.

After appropriate response actions are taken (as determined on a load specific basis) and the load is determined safe, it is unloaded outside the south side of the building in the truck turn-around area. The area is gravel, so should there be any smoldering or burning material discharged, it will be extinguished using fire extinguishers and/or on site soil. If necessary, small amounts of water will also be used to assist in extinguishing any fire or smoldering materials. Once fully extinguished, facility operators will move the material into the building where it will be loaded into a transfer trailer using standard operating procedures. The area impacted by a hot load will also be cleaned to ensure that no residual material, contaminated soil or water is left in the area.

6.01(4). Medical Emergency/Personal Injury

In the event of minor personal injury at the facility, first aid kits will be available at the scale/office and inside the recycling building. Site personnel will be instructed to call 911.

First aid and CPR training will be provided to site employees to assist in the immediate care of burns, needle sticks, RMW exposure, chemical exposure and physical injuries.

For non-emergencies, transportation is provided to the Dartmouth Hitchcock Medical Center in Keene, New Hampshire. The contact information and routing to the hospital will be posted at the facility.

For more serious injuries, Mutual Aid Ambulance service will be contacted (911) for immediate instruction and treatment, including transport to the nearest hospital or to another medical treatment facility, if necessary.

Annual training is provided to facility employees regarding procedures for notification of injuries, fires and other emergencies.

6.01(5) Major Spills

6.01(5)(a). General Site

Although a major spill of any kind is unlikely, a third party spill response contractor will be called to the facility to manage the clean-up, should one occur. The types of spills that may occur include:

- i Petroleum from a piece of operating equipment or any other vehicle on site.

In the event that a petroleum-based liquid is accidentally spilled from operating equipment or vehicles using the facility, it will be immediately contained, absorbent applied and cleaned up by facility operating personnel.

For spills greater than 25 gallons (or less than 25 gallons if for any reason site personnel are unable to immediately contain) the fire department will be contacted. Personnel will be isolated from the area. Trained personnel will be assessed and determine clean up required. NHDES will be notified.

- ii *Unknown substance from an incoming load*

Facility personnel will immediately secure the area and contact the appropriate local and state personnel and agencies for assistance in determining appropriate procedures for managing the spill.

6.01(5)(b) Unloading/Loading Area – Recycling Building

The RPF recycling building is designed and constructed to fully contain all spills.

There are floor drains in the tipping floor so that any spills and/or any accumulation of liquids are contained in the holding tank. These liquids are co-mingled with the non-recyclable materials and/or absorbents. Spill kits, which include speedy dry, other absorbent material, and absorbent booms are kept inside the building. The holding tank shall be cleaned and containment sent to a disposal center.

The trailer tunnel floor drain is connected to an underground storage tank for collection and temporary storage of liquid. It is equipped with visual and audio signal alarms, which are activated once the water level reaches the maximum water depth.

Accumulated liquid is monitored and periodically pumped out and transported to a waste treatment facility permitted to treat such liquids.

6.01(6). Unacceptable Waste

If any unacceptable material is encountered, it is separated and removed from the facility by the original hauler. When such material is

encountered, RPF will inform the hauler of other potentially available facilities for its management. If the original hauler is no longer at the facility or cannot be identified, RPF will assume responsibility for the proper disposal of the material as required by solid waste and/or hazardous waste rules.

While unlikely, should asbestos-containing material be inadvertently transported to the facility with C&D debris (e.g., asbestos shingles) it will be segregated and isolated from ongoing activities. RPF will contact outside contractors listed in Section 6.02 to manage the material.

Similarly, outside contractors will be contacted to manage any material that is suspected hazardous or otherwise requires special handling (any small containers of these flammable materials will be temporarily stored in a steel fireproof cabinet per the fire department).

Should lead-acid batteries be encountered, they will be managed pursuant to the universal Waste Rule (Env-Hw 1100) using procedures described in WMD-HW-18 and WMD-SW-4. They will be managed as follows:

- Stored on pallets so that their electrodes do not come into contact with electrodes of other batteries or metal objects;
- If stored in containers, covers will be loose fitting;
- Stored and kept dry;
- Stored away from sources of sparks or flames; and
- Stored so leaking batteries are separated from non leaking batteries.

These will be periodically transported to authorized battery recyclers or handlers in compliance with DOT requirements.

Should mercury containing devices (e.g., thermometers, thermostats, switches, relays, etc) be encountered, they will be removed and placed in a small container for temporary storage until transfer off site to an authorized outside contractor.

All facility operating personnel will receive initial and periodic refresher training, which covers at a minimum:

- Acceptable recyclable and non recyclable materials
- Prohibited materials
- The facilities procedures to ensure that identified unacceptable material is managed properly.

6.02. Emergency Contacts

A list of emergency contacts and phone numbers will be posted at the scale house and the recycling building. The contact list will be reviewed at least annually and updated as necessary to ensure it is current. A current list (November 2010) that will be replaced periodically, is found in Appendix D.

Section 7.0 Employee Training Program

This section provides a summary of training procedures for RPF supervisory and operations staff. This training is based on requirements of:

- Job position, associated responsibilities and comp[any procedures
- Regulatory-based training requirements.

7.01. Facility Staffing

Facility operating personnel have obtained certification or interim certification in accordance with Env-Sw 1600. At least one management/supervisor will be certified as a level IV operator for every one to five operators.

During hours of operation, at least fifty (50) percent of on site operating personnel directly involved with the management of recyclable and non-recyclable material is certified by the DES as solid waste facility operators pursuant to Env-Sw 1005.07(b)(1) and (3).

7.02. Supervisory and Operating Personnel Training

Operating staff have completed the Solid Waste Facility Operator Training and Certification Program conducted by the New Hampshire Department of Environmental Services.

The facility provides periodic refresher training to facility operations personnel and requires that employees holding Solid Waste Operator Certifications maintain their certification by participating in annual continuing education workshops offered by DES. These workshops cover a variety of topics associated with solid waste facility operations.

New employees complete initial Employee Orientation throughout their 30 day probationary period while working under the direct and immediate supervision of an experienced member of the facility operational staff. Employees shall be certified during probationary period.

The training program at RPF will focus on key elements of safe facility operating practices, such as:

- Facility layout and operating equipment

- Work rules and procedures
- Facility permit and operating plan, including:
 - Materials inspection and identification procedures
 - Acceptable and prohibited materials
 - Contingency plan
- Equipment operating procedures and maintenances requirements
- New Hampshire Solid Waste Rules applicable to collection, storage and transfer facilities.

New employees shall register and obtain interim certification as a Solid Waste Facility Operator, (Level I to Level IV) under the New Hampshire Department of Environmental Services Solid Waste Operator Training and Certification Program. The employees retain their interim certification until they have successfully completed the next scheduled NHDES Solid Waste Facility Operator Training Program.

7.03. Documentation of Training

Documentation of operator training is maintained and posted at the administrative office, including copies of Solid Waste Operator Certificates issued by the New Hampshire Department of Environmental Services for facility staff.

Section 8.0 Recordkeeping and Reporting

8.01. Information Compilation

The facility owner will compile and maintain information documenting key aspects of facility operations. Recyclable and non-recyclable quantity information will be obtained as described in section 3.0. While out-of-State waste is expected to be minimal, an evaluation will be performed to verify that the total quantity of waste received annually from New Hampshire generators does not exceed the total quantity of waste transferred to New Hampshire landfills. Should waste receipts approach its limit, out of-state loads will be scheduled accordingly and the scale operator notified.

All other information compiled will meet the requirements of Env-SW 405.04 (Public benefit) and 1105.06 (Facility Operating Records). The records will be maintained at the facility and will be readily available for NHDES inspection.

8.02. Recordkeeping Requirements

The permittee will compile and maintain records, which document facility operations including:

- (1) Facility Identification by name, street address, municipality and permit number.
- (2) Permittee name, address and telephone number
- (3) Identification of all facility operator(s) by name, address, NHDES Operator certificate number, and dates of employment at the facility.
- (4) Quantity, type, sources and destination of non-recyclables, recyclables, and MSW received at the facility. In accordance with Env-Sw 405.05, the following information specifically will be tracked and recorded:
 - Total quantity of waste that the facility transfers annually to New Hampshire landfills or incinerators.
 - Total quantity the facility receives annually from New Hampshire generators.
- (5) Quantity, type and destination of the materials generated by the facility, including residuals which are not recycled.
- (6) Quantity, type and destination of all certified waste derived products produced by the facility, if any,
- (7) Records of inspections, maintenance and repairs.
- (8) Records of accidents, fires violations, remedial and emergency event response actions
- (9) Incident reports and record of complaints in accordance with Env-SW 1005.09
- (10) Data for all environmental monitoring performed at or for the facility, whether required by the solid waste rules or the permit is undertaken voluntarily.
- (11) Documentation of all contact with the waste management district(s) served by the facility as required by Env-Sw 1105.12
- (12) Other recordkeeping information and documentation required by Env-Sw 400 (Collection, storage, and Transfer Facility Requirements)
- (13) Other information and documentation required by the terms and conditions of the permit and solid waste rules.

RPF will maintain the operating records identified above during the active life of the facility, unless approval is granted or a Type V permit modification pursuant to Env-Sw 315 (g) to relocate or destroy the records. Operating records shall be made available for DES inspection and copies provided to the Department pursuant to Env-Sw 2000 (Inspections)

Following closure of the facility, the operating records will be maintained at a location approved by DES in the Closure Plan, unless destruction of the records is approved pursuant to the provisions of a Type V permit.

8.03. Facility reporting requirements

The permittee will ensure that the reporting requirements of Env-Sw 405.04(3) and 1105.07 (Reporting Requirements) are met and that the annual report for the facility is submitted by March 31 for the prior calendar year. All reporting will be in conformance with Env-Sw 303.03 (Basic Filing Requirements) and Env-Sw 303.04 (Signature Requirements).

Finally, RPF will send a copy of the annual report to the Town of Walpole, Board of Selectmen (as representative for the Walpole Solid Waste Management Department) in accordance with Env-Sw 1105.12. A cover letter will accompany which explains how RPF met its obligations for providing a substantial public benefit (per Env-Sw 405.04) during the preceding year and which requests the Town/District representatives to identify specific needs which the facility may be able to assist in meeting.

Appendix A:

Site Plan

Appendix B:

Registration of Nondomestic Wastewater Holding tank

Appendix C:

Disposal Commitments

Appendix D:

Emergency Contacts

RPF	Jeff Ruggiero	(802) 123-4567
Level IV Operators	Jeff Ruggiero Joe Ruggiero	
Environmental Coordinator		
Alternate Environmental Coordinator		
Ambulance/Fire Police	Emergency	911
Walpole Fire Department	Non-Emergency	(603) 756-3621
Walpole Police Department	Non-Emergency	(603) 455-2058
County Sherriff Emergency	Cheshire County	(603) 352-4238
Local Hospital	Cheshire Medical Center/Dartmouth Hitchcock Clinic	(603) 354-5400
Poison Control Center	Hanover Poison Center	1-800-562-8236
Spill Response Contractor		
Spill Response Contractor – Alt.		
Asbestos Contractor		
State Police (Headquarters)	Emergency	(603) 271-3636
	Emergency – Toll free	(800) 525-5555
	Non-Emergency, Troop C	(603) 358-3333
	Hazardous materials/Petroleum spills	(800) 346-4009
Department of Environmental Services (NHDES)	Emergency Response (Daytime)	(603) 271-3899
	Solid Waste Management Division	(603) 271-2925
	Hazardous Materials Spills	(603)271-3899
Department of Health & Human Services		(603) 357-3510
Homeland Security and Emergency Management		(603) 271-2231
U.S. Environmental Protection Agency (Boston)	Non-Emergency	(888) 372-7341
	Emergency	(800) 424-8802
National Response Center		(800) 424-8802
Federal Emergency Management Agency (Boston)	Boston	(617) 956-7506

Ruggiero Processing Facility

Section VIII Closure Plan

Permit No. DES-SW-SP-12-001

Prepared for:

Ruggiero Processing Facility, LLC

P.O. Box 434

Saxtons River, VT 05154

November 2010

Revised thru July 10, 2014

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Section 1.0 Facility Information

The Facility name, location, mailing address and property owner are as follows:

Name: RUGGIERO PROCESSING FACILITY

Location: Industrial Park Road, Walpole, NH

Mailing Address: Ruggiero Processing Facility, LLC
P.O. Box 434
Saxtons River, VT 05157

Section 2.0 Closure Schedule

This Schedule is based on the RUGGIERO PROCESSING FACILITY's operation as a commercial C&D and recycling facility. With regular maintenance and refurbishment of operating equipment, RFP expects to continue operations indefinitely. However, closure procedures will be initiated when one or more of the conditions of Env-Sw 1006.01 exist. These include:

- RUGGIERO PROCESSING FACILITY's operating permit is expired or revoked.
- RUGGIERO PROCESSING FACILITY ceases operations for any reason.
- Facility sustains irreparable damage.
- Environmental conditions exist that threaten human life or safety or threaten the environment in a way that cannot be remediated.
- Facility is issued an administrative or judicial order to cease operations.

Closure will be completed within sixty (60) days of cessation of operations. The closure will occur according to the following schedule:

30 days prior to Day 1:

- File a *Notice to Close* with the New Hampshire Department of Environmental Services (NHDES), Waste Management Division.
- File notice with NHDES Drinking Water and Groundwater Bureau regarding decommissioning of the Holding Tank.

Day 1 to day 20:

Empty and rinse/clean liquid holding tank. Transfer all recyclables, non-recyclable, and MSW materials to an authorized disposal facility.

Day 21 to day 55

Decommission and remove facility equipment (i.e.: dumpsters, vehicles, etc) so that it can be used at another facility or sold. Clean the building, sweep concrete surfaces and clean surrounding gravel parking and adjacent areas.

Day 56 to day 60

Prepare and submit the notification to the New Hampshire Department of Environmental Services that the closure is complete.

Section 3.0 Waste Identification

Section 2 of the Ruggiero Processing Facility Operating Plan describes the materials authorized and prohibited for management at the facility. These include:

3.1. Authorized Waste

- Recyclable materials including glass, aluminum, steel cans, paper, high density polyethylene (HDPE) and polyethylene terephthalate (PET) plastics, and metal, as defined by Env-Sw 104.19; and
- Construction/Demolition debris as defined by Env-Sw 102.42.

- Municipal Solid Waste, MSW, as defined by Env-Sw 103.46.

3.2. Prohibited Materials

- Hazardous waste;
- Sludge or septage waste;
- Asbestos waste;
- Infectious waste;
- Contained gaseous waste;
- Universal waste batteries (except for incidental lead-acid batteries);
- 55-gal drums or other liquid containers (except for five gallon or less empty containers incidental to the load);
- Explosives;
- Ash;
- Mercury containing devices;
- Liquid waste; and
- Other wastes not authorized by condition 6 of the Permit.

Section 4.0 Notifications

At least 30 days prior to the cessation of facility operations, the RUGGIERO PROCESSING FACILITY will provide written notification, including notice of the planned date of facility closure, to the following in accordance with the New Hampshire Solid Waste Rules:

- All users of the facility
- Town of Walpole
- NHDES – Waste Management Division
- NHDES – Drinking Water and Groundwater Bureau

The notice will be posted at the scale office and will include a final date for the receipt of recyclables, non-recyclables, and MSW at the facility.

Section 5.0 Closure Requirements

Closure will be in conformance with this facility closure plan, Env-Sw 406, Env-Sw 1006 and Env-Sw 1106.

At the Specified closure date, receipt of recyclables, non-recyclables, and MSW will cease. At that time, the three activities described in sections 5.1, 5.2 and 5.3 of this closure plan will commence. Upon completion of the activities, the facility will be closed.

5.1. Recyclable, Non Recyclables and MSW Removal

Within 20 days following the last day of facility operations, all recyclables and non-recyclable material on site will be removed (*see section 2.0 – Closure Schedule*).

- All recyclables will be transported to authorized reclamation facilities and/or secondary markets.
- All remaining non-recyclable/residual material and MSW will be transported to authorized disposal facilities in accordance with New Hampshire Solid Waste Rules.
- The liquids holding tank will be emptied and rinsed; wastewater will be transported off site to a local authorized wastewater treatment facility.

No revenue from the sale of any recyclables stored on site at the time of closure have been assumed nor considered in the closure cost estimate prepared for this plan.

5.2. Equipment Removal and Decommissioning

Upon completion of recycling activities at the facility, all operating equipment (i.e., heavy operating equipment, excavators, baler) will be removed, sold or reallocated (in a commercial business separate from the recycling operation). The scale and liquids holding tank will be cleaned and left on site for subsequent use by a new owner/operator.

No salvage value has been assumed nor considered in the closure cost estimate prepared for this plan.

5.3. Facility Cleanup

Following the removal of materials from the facility, the building will be cleaned and any contamination to its approximate original

condition of cleanliness. Facility signage will be removed. Any water which is stored in the holding tank and utilized in this cleaning effort will be absorbed by absorbent materials and/or collected and disposed of at a permitted wastewater treatment facility.

Section 6.0 Post-Closure Requirements

The RUGGIERO PROCESSING FACILITY will process and recover recyclables and manage recyclables, non-recyclables, and MSW by transfer to authorized facilities during its operating life.

When facility operations cease, the closure plan activities described in Section 5 of this closure plan will assure that the facility will not adversely affect the environment, public health or safety. As a result, post closure monitoring, testing, inspection and maintenance of the facility following completion of facility closure will not be performed and post closure reporting will not take place, (*unless required by local, state or federal regulations*).

Section 7.0 Recordkeeping and Reporting

7.1. Closure Reporting

Following completion of closure activities described in Section 5 of this closure plan, RUGGIERO PROCESSING FACILITY will provide written notice to the Town of Walpole and NHDES – Waste Management Division that closure has been completed.

RUGGIERO PROCESSING FACILITY will submit a final annual facility report to the NHDES Waste Management Division by March 31 of the year following closure, pursuant to reporting requirements described in Env-Sw 1105.07(b).

7.2. Recordkeeping

Following closure of the facility, all records regarding the facility operation and closure will be retained at the RUGGIERO PROCESSING FACILITY's principal place of business at Industrial Road in Walpole, NH or as otherwise specified in the facility closure report.

Section 8.0 Other Closure Permits

No other permits or compliance related activities are required to implement facility closure.

Section 9.0 Closure Cost Estimate

A closure cost estimate for the RUGGIERO PROCESSING FACILITY was prepared in accordance with this closure plan and criteria in Env-Sw 1403.02 and included as a part of the closure plan. The following criteria were used when preparing the estimate.

- An assumption that maximum combined volume of non-recyclable and MSW materials in storage is 45 tons.
- An assumption of a maximum of 100 gallons of liquids are stored in the liquid holding tank and an additional 500 gallons of rinse water to clean.
- The liquid holding tank will be left on site.
- Current market rates for having third party perform all closure activities.
- The estimate considers a point in the facilities active life when the extent and manner of operations and compliance with applicable laws and rules make closure the most expensive.
- The value of on site recyclables was not considered or used to reduce the cost estimate of closure.
- Salvage value from the sale of facility structures, equipment or other assets associated with the facility were not used to reduce the cost estimate of closure.
- A contingency in the amount of 10% of the total itemized costs was included.

The financial assurance plan will include a letter of credit and standby trust agreement in a form previously accepted by the NHDES. Following approval of the proposed permit application, the closure cost estimate will be updated on an annual basis, consistent with current New Hampshire Solid Waste Rules.

Appendix A to this closure plan presents the Standby Trust Agreement and closure cost estimate prepared for the RUGGIERO PROCESSING FACILITY.

Appendix A: Financial Assurance Plan and Closure Cost Estimate

Cost Estimate Form for Closure of Solid Waste Collection/Storage/Transfer Facility

Facility Name: Ruggiero Processing Facility, LLC
 Address: PO Box 434
 Saxtons River, VT 05157

State of New Hampshire
 Department of Environmental Services
 Waste Management Division
 29 Hazen Drive, PO Box 95 Concord, NH 03302-0095
 (603) 271-2925 FAX (603) 271-2456

DES Permit #:

Annual Cost Estimate for Time Period Beginning: August 2011 to August 2012

Permitted Material	Quantity ¹ SPR ²	Quantity ¹ Non-SPR	Disposal Cost for Non-SPR Material	Loading Costs for Non-SPR Material	Transportation Costs for Non-SPR Material	Total Cost	Disposal Destination	
Non-Recyclables		10T	\$700	\$250	\$400	\$4,450	Keene Tranfer station	
Unprocessed Recyclables		12T	\$840	\$500	\$800	\$2,140	Hammonds grinding and Recycling Grantham, NH	
Processed Recyclables	33T						Hammonds grinding and Recycling Grantham, NH	
Municipal Solid Waste		35T	\$2,450	\$500	\$800	\$3,750		
							Name of Third Party Providing Estimate for Work to be Performed	
Site Clean-up (per approved closure plan)	Description of Work to be Performed							
Labor	miscellaneous						\$1,000	SVE Associates
Equipment decommissioning	excavator to be sold or scraped so there is no disposal cost						NC	SVE Associates
Equipment Removal	dumpsters to be sold or scraped so there is no disposal cost						NC	SVE Associates
Building cleaning	walls and slab to be powerwashed						\$1,000	SVE Associates
Other:	holding tank to be evacuated						\$500	SVE Associates
Miscellaneous Closure Work								
Administrative	legal						\$5,000	
Other:	miscellaneous						\$1,000	
Subtotal							\$18,840	
10% Contingency							\$1,884	
Total Closure Costs							\$20,724	

¹ Note: The combined Quantity of SPR and Non-SPR must equal the maximum permitted storage capacity allowed.

² A select processed recyclable (SPR) is a recyclable material (a material comprised 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 and packaged in a manner satisfying the specifications for transportation to and acceptance by a market that will use the material for 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 facility's active life when the extent and manner of facility operations in compliance with permit conditions and applicable laws and rules makes closure the most expensive, as indicated by the approved facility closure plan.

Signature of Preparer: Bob Hitchcock, SVE

Signature of Permittee: Joseph P...
 Date: 7/21/14

Date: May 19, 2011, revised July 10, 2014