

FORM O
TRANSFER FACILITIES



Date Prepared/Revised January 2023
DEP USE ONLY
Date Received

FORM O TRANSFER FACILITIES

This form must be fully and accurately completed. All required information must be typed or legibly printed in the spaces provided. If additional space is necessary, identify each attached sheet as Form O, reference the item number and identify the date prepared. The "date prepared/revised" on any attached sheets needs to match the "date prepared/revised" on this page.

General References: Chapters 279 and 293

SECTION A. SITE IDENTIFIER

Applicant/permittee: **North East Waste Systems, LLC**

Site Name: **North East Waste Systems Transfer Facility**

Facility ID (as issued by DEP): **TBD by PaDEP**

SECTION B. OPERATING PLAN

1. Description of general operations of the facility:

Refer to Attachment O-1

2. Source(s) of Waste:

a. Waste Origin: **Refer to Attachment O-1**

b. Composition: **Refer to Attachment O-1**

c. Weight or volume (cubic yards, tons): **Refer to Attachment O-1**

SECTION B. OPERATING PLAN (Continued)

3. Equipment to be used: **Refer to Attachment O-1**

4. Describe the equipment and procedures for waste measurement: **Refer to Attachment O-1**

5. Describe how wastes, not approved by the Department, will be prevented from being accepted at the facility.
Refer to Attachment O-1

6. Loading rate: **Refer to Attachment O-1** _____
7. Capacity of facility: **Refer to Attachment O-1** _____
8. Expected life: **Refer to Attachment O-1** _____
9. Outline the plan for alternative waste handling or disposal during periods when the proposed facility is not in operation, including procedures to be followed in case of equipment breakdown. Procedures may include the use of standby equipment, extension of operating hours, and contractual agreements for diversion of wastes to other facilities. **Refer to Attachment O-1**
10. Describe the design, capacities and operation of any leachate storage facilities which are to be installed at the transfer facility.
Refer to Attachment O-1

11. Describe how the installation and operation of this facility will be consistent with requirements of Act 1988-101.
Refer to Attachment O-1

12. Where above ground or subsurface storage tanks are to be used, provide details as to the basis for their design and installation.
Refer to Attachment O-1

13. Outline the plan for hiring and training equipment operators and other personnel concerning the operation and approved design of the facility.
Refer to Attachment O-1

14. Operating hours of facility: **Refer to Attachment O-1**

15. Describe procedures for collection, disposal or treatment of rinse water and leachates produced at the site.
Refer to Attachment O-1

SECTION B. OPERATING PLAN (Continued)

16. Drawing indicating area for isolating detected radioactive waste.

Refer to Attachment O-1

17. Drawing indicating location of radioactive monitoring equipment.

Refer to Attachment O-1

SECTION C. PLAN FOR ACCESS ROADS

1. Design, cross-sections, and specifications for access roads, including load limits.

Refer to Attachment O-1

2. Describe the access road plan, including designs, cross-sections and specifications.

a. Explain how the access roads will be designed, constructed and maintained to prevent runoff and erosion and sedimentation to streams.

Refer to Attachment O-1

b. Will streams or waterways be crossed? Yes No

If yes, explain how the applicant will meet the requirements of Chapter 105.

Refer to Attachment O-1

SECTION C. PLAN FOR ACCESS ROADS (Continued)

- c. Describe the drainage system for temporary and permanent roads to be located at the proposed facility.

Refer to Attachment O-1

- d. Surfacing or paving of access roads.

- asphalt
 gravel
 cinders
 other equivalent material (explain) _____

Will the grade of any access road be greater than 12%? Yes No

If yes, explain

- e. Explain the locations, widths and methods of maintenance for **all** access roads to be located on the proposed permitted facility and property. **Refer to Attachment O-1**

SECTION D. ACCESS CONTROL

1. Describe the gate or other barrier to be constructed and maintained at potential vehicular access points to block unauthorized access to the site. Include the heights, dimensions, and construction materials. **Refer to Attachment O-1**

2. Describe the fence or other suitable barrier to be constructed and maintained around the facility to prevent unauthorized access. Include the heights, dimensions, and construction materials. **Refer to Attachment O-1**

3. Describe the site security provisions. **Refer to Form O, Attachment O-1**

SECTION E. SOIL PLAN

1. Plan to manage surface water and control erosion during phases of construction and operation of the permit area. Calculations shall be based on 25 year, 24-hour precipitation events. **Refer to Attachment O-1**
2. Plan should include dimensions of diversion ditches (length, gradient, cross section for configuration by reach) and capacities of ditch volume by reach. Design calculations should be included. **Refer to Attachment O-1**
3. Plan for collection, disposal or treatment of rinse water and leachate. **Refer to Attachment O-1**

SECTION F. SOIL AND GROUNDWATER MONITORING PLAN (If required by the Department)

Refer to Attachment O-1

SECTION G. NUISANCE CONTROL PLAN

Plan to prevent and control hazards or nuisance from vectors, odors, noise, dust, and other nuisances not otherwise provided for in the permit application. Plan must provide for routine assessment of vector infestation and for countermeasures to be taken. Plan may include a control program involving a contract for an exterminator. **Refer to Attachment O-1**

SECTION H. LITTER CONTROL PLAN

Describe the litter control plan and explain how the operator will prevent litter from blowing or becoming deposited off-site

- a. Explain the types, locations and maintenance procedures for litter fences to be used at the proposed facility.

Refer to Attachment O-1

- b. Explain the frequency of litter pick-up and disposal.

Refer to Attachment O-1

ATTACHMENT O-1
FORM O NARRATIVE RESPONSES

NORTH EAST WASTE SYSTEMS, LLC
NORTH EAST WASTE SYSTEMS TRANSFER FACILITY

FORM O: TRANSFER FACILITIES
ATTACHMENT O-1: NARRATIVE RESPONSES

Table of Contents

A. SITE IDENTIFIER		1
B. OPERATING PLAN		1
B.1	DESCRIPTION OF GENERAL OPERATING PLAN	1
B.2	SOURCES OF WASTE	3
B.3	EQUIPMENT TO BE USED	3
B.4	EQUIPMENT AND PROCEDURES FOR WASTE MEASUREMENT	3
B.5	DESCRIPTION OF HOW WASTES, NOT APPROVED BY THE DEPARTMENT, WILL BE PREVENTED FROM BEING ACCEPTED AT THE FACILITY	4
B.6	LOADING RATE	4
B.7	CAPACITY OF FACILITY	5
B.8	EXPECTED LIFE	5
B.9	OUTLINE A PLAN FOR ALTERNATE WASTE HANDLING OR DISPOSAL	5
B.10	LEACHATE STORAGE FACILITIES	5
B.11	ACT 101-1988	5
B.13	GENERAL EMPLOYEE TRAINING	6
B.14	OPERATING HOURS OF FACILITY	6
B.15	RINSE WATER AND LEACHATE	6
B.16	RADIOACTIVE WASTE ISOLATION AREAS	7
B.17	RADIOACTIVE MONITORING EQUIPMENT	7
C. PLAN FOR ACCESS ROADS		7
C.1.	DESIGN, CROSS-SECTIONS AND SPECIFICATIONS FOR ACCESS ROADS, INCLUDING LOAD LIMITS	7
C.2.	DESCRIBE THE ACCESS ROAD PLAN, INCLUDING DESIGNS, CROSS-SECTIONS AND SPECIFICATIONS	7
D. ACCESS CONTROL		8
D.1	DESCRIBE THE GATE OR OTHER BARRIER TO BE CONSTRUCTED AND MAINTAINED AT POTENTIAL VEHICULAR ACCESS POINTS TO BLOIGNCK UNAUTHORIZED ACCESS TO THE SITE. INCLUDE HEIGHTS, DIMENSIONS AND CONSTRUCTION MATERIALS	8
D.2	DESCRIBE THE FENCE OR OTHER SUITABLE BARRIER TO BE CONSTRUCTED AND MAINTAINED AROUND THE FACILITY TO PREVENT UNAUTHORIZED ACCESS TO THE SITE. INCLUDE HEIGHTS, DIMENSIONS AND CONSTRUCTION MATERIALS	8
D.3	DESCRIBE THE SITE SECURITY PROVISIONS	9
E. SOIL PLAN		9
E.1. & E.2.	PLAN TO MANAGE SURFACE WATER AND CONTROL EROSION	9
E.3.	PLAN FOR COLLECTION, DISPOSAL OR TREATMENT OF RINSE WATER AND LEACHATE	9
F. SOIL AND GROUNDWATER MONITORING PLAN		9
G. NUISANCE CONTROL PLAN		9
G.1.	GENERAL HOUSEKEEPING	9
G.2.	VECTORS	9
G.3.	ODORS	10
G.4.	DUST	10
G.5.	NOISE	10
H. LITTER CONTROL PLAN		10

NORTH EAST WASTE SYSTEMS, LLC
NORTH EAST WASTE SYSTEMS TRANSFER FACILITY

FORM O: TRANSFER FACILITIES
ATTACHMENT O-1: NARRATIVE RESPONSES

Narrative

A. SITE IDENTIFIER

This operations plan was prepared for the North East Waste Systems Transfer Facility (NEWT), which is owned and operated by North East Waste Systems, LLC (NEWS). NEWS is seeking authorization from the Pennsylvania Department of Environmental Protection (PaDEP) to allow direct transfer of municipal solid waste (MSW) and construction/demolition (C&D) waste operating under a facility located in Hazleton, Pennsylvania.

B. OPERATING PLAN

B.1 DESCRIPTION OF GENERAL OPERATING PLAN

MSW and C&D wastes will be delivered to the NEWT by trucks entering from a privately owned road off of State Route 93 being developed through the property by Inter Port Commerce Centre, Inc. as part of the overall development plan for the property. Waste delivery trucks will proceed via this private driveway to the NEWT's driveway entrance near the permit boundary and proceed to the scalehouse for waste screening/weigh in activities. After completing check-in activities, the inbound trucks containing the MSW and C&D wastes will be directed to the NEWT to unload their vehicles within the building's tipping floor area. Waste delivery vehicles departing the NEWT will then exit back to the scalehouse and tarping area. The MSW and C&D wastes will be loaded onto transfer trailer trucks and/or railcars. Municipal and C&D wastes managed by the NEWT will be directed via transfer trucks and/or rail cars to approved, designated, permitted disposal facilities. Transfer trailers will also exist back to the scalehouse and tarping area. The layout of the transfer building and traffic flow pattern is depicted on the permit drawings.

The remainder of this section provides greater detail of the operation of the NEWT.

B.1.1 TRANSFER BUILDING

Approved incoming waste deliveries will be unloaded within the interior of the building onto a concrete tipping floor. After unloading, NEWT personnel will stage the wastes into defined temporary storage areas using push walls as depicted on the permit drawings or directly load out the wastes into rail cars and transfer trailers.

The waste transfer process will be completed using front-end loaders, skid steers and excavators which will push load waste into open top railcars or transfer trailers. Alternative means of loading the railcars and transfer trailer trucks may also be used.

NEWS will also maintain a citizen's drop off area for recycling as shown on the permit drawings. Three roll-off type containers will be maintained within the permit area for recycling collection.

Refer to Permit Drawings 002D005A and 002D005B for additional information pertaining to the proposed transfer building associated with the NEWT.

B.1.2 GENERAL OPERATING PROCEDURE

After weighing in at the certified scale and receiving instructions/directions from the Scalemaster, the trucks loaded with wastes will proceed to the proposed entrance of the transfer building. Trucks will wait outside the building entrance until directed by the tipping floor equipment operator to pull into the building to unload their waste. Truck drivers can use the area outside the building to prepare for unloading their waste (e.g., remove tarps, etc.).

The NEWT equipment operators shall direct incoming waste haulers where to unload on the tipping floor. The tipping floor shall serve as a temporary staging area for wastes to be pushed by NEWT equipment operators into the respective containment areas. The tipping floor area will also be used to crush or break bulky wastes into smaller pieces using the tracks on heavy equipment before loadout activities. Unloading of waste outside of the transfer building will not be allowed.

In the event that the waste storage areas and space available on the tipping floor is reaching capacity, the tipping floor equipment operator will temporarily stop incoming hauling vehicles from dumping on the tipping floor and immediately contact the Facility Manager. No additional waste shall be dumped on the tipping floor until room is available for storage within the containment areas or tipping floor. The Facility Manager must decide to either have waste hauling trucks wait until room is available in the transfer facility building, or to divert incoming waste vehicles to other transfer or disposal facilities.

The waste transfer operations will occur along the northern portion of the building where either railcars or transfer trailers can be loaded. The waste transfer process is proposed to be addressed using a combination of front-end loaders, skid steers or excavator. Alternative means of loading the railcars and transfer trailer trucks may be used.

The railcars or transfer trailer trucks loaded with the wastes will be transported to a permitted off-site landfill or other approved facility for disposal. Transfer trailer trucks associated with the hauling of C&D and MSW waste will exit the building and be weighed and tarped before departing the facility. All loaded railcars will also be covered and tarped by NEWT personnel before departing the permit area.

A designated rail spur is proposed for the movement of railcars through the facility. The railcars will transfer to and from the loading area within the transfer building by a front-end loader using rail hitch attachment or other suitable

railway equipment. As required, the railway company will deliver empty railcars and remove the loaded cars from the facility for delivery to the approved disposal facility. The loaded railcars containing wastes will be covered and tarped before departing the facility and comply with bonding requirements. The delivery and exit of rail cars are solely under the control of the rail carrier.

In the event of excessive winds or heavy snow events, the acceptance of waste at the NEWT may be temporarily limited or stopped if necessary, until the conditions have abated.

B.2 SOURCES OF WASTE

B.2.1 ORIGIN

The MSW and C&D waste accepted at the NEWT is anticipated to primarily originate from Luzerne County and its neighboring communities. The NEWT is allowed to receive both municipal and C&D wastes from Luzerne County and surrounding counties or states so long as it is not in conflict with the applicable PaDEP approved Act 101 Municipal Waste Management Plan. All MSW accepted will be transported to permitted disposal facilities designated in the applicable PaDEP approved Act 101 Municipal Waste Management Plan.

B.2.2 COMPOSITION

Only MSW and C&D wastes will be accepted at the NEWT.

B.2.3. WEIGHT OR VOLUME (CUBIC YARDS, TONS):

The proposed maximum daily waste acceptance rate for the NEWT is 700 tons/day.

B.3 EQUIPMENT TO BE USED

Quantity	Description
1-2	Excavator
1-2	Front End Loader
1-2	Skid Steer

B.4 EQUIPMENT AND PROCEDURES FOR WASTE MEASUREMENT

Two electronic scales are used to weigh incoming and outgoing vehicles. All waste delivery vehicles are required to enter the inbound scale for check-in activities. While on the scale, the Scalemaster records the weight, type, origin and the hauler of the waste. The Scalemaster collects all paperwork from the truck driver for regulatory and accounting purposes. The Scalemaster develops a weigh ticket record noting the customer's information and then directs the truck driver to proceed to the transfer building for unloading.

After depositing the waste in the transfer building, the waste-hauling vehicle must exit the facility by crossing the scale designated for outgoing vehicles. The scale records

the empty weight, and the Scalemaster generates a weigh ticket with transaction information, including the weight of the waste that has been deposited.

B.5 DESCRIPTION OF HOW WASTES, NOT APPROVED BY THE DEPARTMENT, WILL BE PREVENTED FROM BEING ACCEPTED AT THE FACILITY

B.5.1 DAILY OPERATIONAL METHODOLOGY

Vehicles delivering waste to the NEWT will be logged in at the scale and the driver will be asked to identify the type and source of the waste. If the waste described is acceptable according to permit requirements, and there are no apparent physical discrepancies evident in the load (leaking liquid, suspicious labels), an attendant will direct vehicles to the transfer facility building entrance for unloading. Each load will be visually inspected by NEWT personnel after unloading in the transfer building to assure that materials being delivered meet permit requirements. NEWT personnel will be trained to recognize acceptable waste. If unacceptable wastes are detected, the load will be refused, and the hauler will not be permitted to unload. If unacceptable wastes are unloaded, the hauler will be required to reload and remove the contaminated load from the site at the hauler's expense. If the hauler cannot be identified, facility management will plan with a disposal facility that is licensed to accept the material.

B.5.2 RADIATION PROTECTION ACTION PLAN

The radiation protection action plan is described in the Radiation Protection Action Plan enclosed under Form X of this permit application.

B.6 LOADING RATE

The NEWT is proposing to accept 700 tons/day of municipal and/or C&D wastes (which averages to a rate of 64 tons/hour over an 11-hour waste acceptance period). Experience at other transfer facilities has shown that waste can be loaded into transfer trailers at a rate of approximately 40 to 60 tons per hour per bay. This facility is proposed to be constructed such that two transfer trailers or railcars can be loaded nearly simultaneously if necessary. Therefore, the loading rate at the proposed facility is anticipated to be 80 to 120 tons per hour. In addition, the facility will be designed with the ability to temporarily store wastes along push wall areas further ensuring the building will be sufficiently capable of accommodating the proposed waste acceptance rate.

In the event that the waste storage areas and space available on the tipping floor is reaching capacity, the tipping floor equipment operator will temporarily stop incoming hauling vehicles from dumping on the tipping floor and immediately contact the Facility Manager. No additional waste shall be dumped on the tipping floor until room is available for storage within the containment areas or tipping floor. The Facility Manager must decide to either have waste hauling trucks wait until room is available in the transfer facility building, or to divert incoming waste vehicles to other transfer or disposal facilities.

B.7 CAPACITY OF FACILITY

In its proposed configuration, the NEWT should be capable of temporarily storing the maximum daily tonnage of waste. Refer to the permit drawings for additional information regarding the location of the proposed municipal waste and C&D storage areas associated with the NEWT.

B.8 EXPECTED LIFE

Since the equipment and facilities are either repairable or replaceable, the life of the facility is indefinite.

B.9 OUTLINE A PLAN FOR ALTERNATE WASTE HANDLING OR DISPOSAL

B.9.1 EQUIPMENT CONTINGENCIES

The facility will maintain a number of pieces of waste handling equipment to enable the operations to continue despite breakdowns in some of the equipment. Additionally, NEWS will maintain contracts with service companies to complete regular maintenance and repairs upon equipment breakdowns or lease additional equipment as warranted to supplement their needs.

B.9.2 DISPOSAL CONTINGENCIES

In the event that the waste storage areas on the tipping floor are reaching capacity, the NEWT equipment operator will temporarily stop incoming hauling vehicles from unloading on the tipping floor and immediately contact the Facility Manager. No additional waste shall be unloaded on the tipping floor until room is available in the storage or tipping floor areas. The Facility Manager must decide to either have waste hauling trucks wait until room is available on the tipping floor, or to divert incoming waste vehicles to other transfer or disposal facilities. Likewise, should the facility not be able to accept waste due to unforeseen events (e.g., power outage, labor shortage, etc.), waste will be diverted to other transfer or disposal facilities.

B.10 LEACHATE STORAGE FACILITIES

Liquids generated from the building operation will be diverted to floor drains which convey leachate to an underground leachate storage tank for regular pump out. The tank will meet the requirements of 25 PA Code Chapter 285. The piping for the leachate collection system will be comprised of a minimum 4 inch PVC Schedule 80 or SDR 17 HDPE pipe. An automated level monitoring system will be utilized to document levels and to better enhance leachate management. This system will be equipped with a high level warning sensor and alarm per 25 PA Code 285.122(g).

B.11 ACT 101-1988

The NEWT will be consistent with the requirements of Act 101. Act 101 requires Counties to plan for management and disposal of MSW and provide capacity assurance for disposal of MSW as well as designated disposal facilities for acceptance of all MSW generated within the county. Transfer Facilities are not designated facilities under Act 101.

B.12 ABOVE GROUND OR SUBSURFACE STORAGE TANKS

Liquids generated from the building operation will be diverted to floor drains which convey leachate to an underground leachate storage tank for regular pump out. The tank will meet the requirements of 25 PA Code Chapter 285. The piping for the leachate collection system will be comprised of a minimum 4 inch PVC Schedule 80 or SDR 17 HDPE pipe. An automated level monitoring system will be utilized to document levels and to better enhance leachate management. This system will be equipped with a high level warning sensor and alarm per 25 PA Code 285.122(g). NEWS will inspect and test the tanks prior to commencing transfer operations at the facility. Tank testing shall be performed in accordance with 25 PA Code 25, Chapter 245. The composition and capacity of each tank, along with the results of the initial inspection and testing, will be provided to the PaDEP.

B.13 GENERAL EMPLOYEE TRAINING

Employee candidates must possess the basic skills to perform the tasks required for the position for which they are applying. The qualifications of candidates are determined by management through personal interviews, review of work experience and personal references. Potential employees must pass a physical and drug screen examination before they can be hired. Before starting work assignments, employees are trained in the Emergency Response Plan (PPC Plan), locations of inventory of safety supplies, use of fire extinguishers and fire response procedures, use of Personal Protective Equipment (PPE) and general safety practices, as well as the skills needed to perform their job functions. Examples of this type of training are equipment operation, daily equipment inspection, monitoring of loads, and identification of unacceptable materials. Records of employee training completed on site are maintained on site.

NEWS will plan on conducting safety and informational meetings approximately every other week. The general topics covered are listed in the Emergency Response Plan. The Facility Manager has a detailed knowledge of training information and serves as the instructor to the employees. General practices and emergency response procedures covered in this PPC Plan are covered in the safety-training program several times each year. Specific training is conducted for employees related to each employee's specific work assignment.

In addition to scheduled meetings, the Facility Manager shall take advantage to train employees during the normal course of operations when the opportunity presents itself.

B.14 OPERATING HOURS OF FACILITY

The proposed permitted operating hours for the NEWT to accept MSW and C&D wastes are Monday through Saturday 6:00 a.m. to 4:00 p.m. The waste transfer operating/loadout hours associated with the NEWT are proposed to occur Monday through Saturday, 24 hours/day.

B.15 RINSE WATER AND LEACHATE

Refer to Section B.10.

B.16 RADIOACTIVE WASTE ISOLATION AREAS

The isolation areas to be used in the event of receipt of radioactive waste are described in the Radiation Protection Action Plan (Form X).

B.17 RADIOACTIVE MONITORING EQUIPMENT

The radioactive monitoring equipment is described in the Radiation Protection Action Plan (Form X).

C. PLAN FOR ACCESS ROADS

C.1. DESIGN, CROSS-SECTIONS AND SPECIFICATIONS FOR ACCESS ROADS, INCLUDING LOAD LIMITS

The NEWT's site access road will tie into a private roadway that will be owned and maintained by a separate entity. The proposed site will follow the roadway design previously used by NEWS at other facilities which at a minimum will be comprised of a compacted stone base of approximately eight inches in depth. NEWS intends to surface the primary haul paths with asphalt. NEWS may also surface the proposed gravel areas with asphalt at a later date. The location of the proposed site access road is depicted on the permit drawings.

C.2. DESCRIBE THE ACCESS ROAD PLAN, INCLUDING DESIGNS, CROSS-SECTIONS AND SPECIFICATIONS

C.2.1. EXPLAIN HOW THE ACCESS ROADS WILL BE DESIGNED, CONSTRUCTED AND MAINTAINED TO PREVENT RUNOFF AND EROSION AND SEDIMENTATION TO STREAMS.

The proposed NEWT's site access roadway will follow the roadway design previously used by NEWS at other facilities which at a minimum will be comprised of a compacted stone base of approximately eight inches in depth to prevent and control erosion runoff. NEWS intends to surface the primary haul paths with asphalt as well as potentially paving other proposed gravel areas with asphalt at a later date. Refer to Form I for the erosion & sedimentation controls and stormwater management plan associated with the development of the proposed NEWT.

C.2.2 WILL STREAMS OR WATERWAYS BE CROSSED?

There are no roadway stream/waterway crossings associated with the NEWT.

C.2.3 DESCRIBE THE DRAINAGE SYSTEM FOR TEMPORARY AND PERMANENT ROADS TO BE LOCATED AT THE PROPOSED FACILITY.

Refer to Form I for information regarding the management of surface water and the control of erosion associated with the proposed facility.

C.2.4 SURFACING OR PAVING OF ACCESS ROADS.

The proposed NEWT's primary haul roadways through the site are intended to be surfaced with asphalt to minimize dust generated on site. Other areas will follow the roadway design previously used by NEWS at other facilities which at a minimum will be comprised of a compacted stone base of approximately eight inches in depth to prevent and control erosion runoff. NEWS may also surface the proposed gravel areas with asphalt at a later date.

C.2.5 EXPLAIN THE LOCATIONS, WIDTHS AND METHODS OF MAINTENANCE FOR ALL ACCESS ROADS TO BE LOCATED ON THE PROPOSED FACILITY AND PROPERTY.

The proposed hauling paths within the facility allows for refuse collection vehicles to access the NEWT from the privately owned roadway which connects with SR 93. The private access driveway will have a cart path width of a minimum of approximately 24 feet with shoulders and provides appropriate turning radius for large vehicles. This driveway will be maintained by the developer of the overall project area to assure access to the NEWT property. The Site Operations Manager for the NEWT will inspect the access roadways within the NEWT project area regularly and schedule any repairs as they become necessary.

D. ACCESS CONTROL

D.1 DESCRIBE THE GATE OR OTHER BARRIER TO BE CONSTRUCTED AND MAINTAINED AT POTENTIAL VEHICULAR ACCESS POINTS TO BLOCK UNAUTHORIZED ACCESS TO THE SITE. INCLUDE HEIGHTS, DIMENSIONS AND CONSTRUCTION MATERIALS

The only vehicular access point to the proposed NEWT is the entrance/exit onto the private access road as shown on the permit drawings. The main access will be equipped with an 8-foot high gate that will be closed and locked when operations are not taking place.

D.2 DESCRIBE THE FENCE OR OTHER SUITABLE BARRIER TO BE CONSTRUCTED AND MAINTAINED AROUND THE FACILITY TO PREVENT UNAUTHORIZED ACCESS TO THE SITE. INCLUDE HEIGHTS, DIMENSIONS AND CONSTRUCTION MATERIALS

The northern perimeter of the NEWT is bordered by an active railway. The remainder of the proposed perimeter of the NEWT is located within an area that was associated with coal mining activities. Due to the relatively isolated nature of the property being developed, NEWS is proposing to limit the establishment of barriers to vehicle access controls along roadways that border the NEWT as depicted on the permit drawings.

D.3 DESCRIBE THE SITE SECURITY PROVISIONS

The Facility Manager of the NEWT or his designee routinely checks the property for unauthorized persons or vehicles. When waste is not being accepted, the gates are locked, and a security guard would be assigned to survey the facility.

E. SOIL PLAN

E.1. & E.2. PLAN TO MANAGE SURFACE WATER AND CONTROL EROSION

Refer to Form I for information regarding the management of surface water and the control of erosion associated with the proposed facility.

E.3. PLAN FOR COLLECTION, DISPOSAL OR TREATMENT OF RINSE WATER AND LEACHATE

Refer to Section B.10.

F. SOIL AND GROUNDWATER MONITORING PLAN

Not applicable.

G. NUISANCE CONTROL PLAN

The following Nuisance Control Plan is being proposed as part of the NEWT's routine operations plan and includes the following:

G.1. GENERAL HOUSEKEEPING

The tipping floor and truck queuing area will be sufficiently cleared of waste each day to allow for sweeping of the concrete surfaces daily and washed weekly except washing is not to be performed when temperatures are below freezing to avoid iced running surfaces. The rinse water does not contain a disinfectant. The area around the main transfer building, including rail car/transfer trailer loading areas are patrolled daily for litter.

Rinse water is generated during the rinsing of the main transfer building floor. Drains are positioned in the tipping floor to collect the rinse water. Refer to Section B.10 for further details on disposal of rinse water and leachate.

G.2. VECTORS

Vector concerns will be managed by NEWT personnel through the following methods: Waste unloading and loading activities are completed within the transfer building which effectively mitigates the concern for birds. Due to the active nature of the waste unloading/loading process, this condition discourages the development of rodent habitation. Moreover, the prompt removal of waste materials from the transfer building also limits the development of significant insect populations. Finally, NEWS will utilize a third-party vector control contractor as warranted to assist in controlling insect and rodent populations.

G.3. ODORS

Potential odors associated with the management of MSWs within the NEWT will be addressed through the implementation of several methods. First, MSW wastes received at the facility will receive priority in being transferred from the building to an off-site disposal facility to limit the potential for odor development. Second, an odor neutralizer system will be utilized as needed within the building. Finally, additional topical odor controls will be applied by NEWT personnel to the waste loaded/unloaded within the transfer building as warranted to assist in controlling odors.

G.4. DUST

The transfer of waste will be conducted inside the transfer building, minimizing the potential for nuisance litter or dust at the facility. A water hose will also be available in the transfer building to wet down wastes that prove to be problematic with dust or litter. Moreover, NEWT personnel will utilize a water truck to wet down construction/demolition waste materials and site roadways as needed to control potential dust emissions. Additionally, since the trucks using the facility will be traveling entirely on paved surfaces and other areas of the permit area will also be paved and/or gravel surface, dust will generally not be an issue outside of the building. As necessary, NEWS will utilize a street sweeper on site to collect mud and dirt from the access roadways to assist in minimizing potential dust emissions.

G.5. NOISE

The loading, unloading and transfer activities at the NEWT will be conducted within the roofed transfer building. Conducting the majority of activities within the building minimizes noise to the surrounding properties.

The heavy equipment operating at the facility is required by OSHA regulations to be equipped with audio backup alarms. The alarm decibel levels will be set at the lowest range allowed by the OSHA regulations.

H. LITTER CONTROL PLAN

The transfer of waste will be conducted inside the transfer building, minimizing the potential for nuisance litter or dust at the facility. A water hose will be available in the transfer building to wet down waste that proves to be problematic with dust or litter. The Facility Manager will inspect the site at least daily and assign laborers to retrieve blown litter if necessary. Loaded railcars will be tarped before exiting the permit boundary to minimize the release of litter. Finally, loaded trucks containing C&D residue or MSW will be tarped before departing the permit boundary of the facility.