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August 4, 2008

Wayne A. Wheeler  
NH Department of Environmental Services  
29 Hazen Drive, P.O. Box 95  
Concord, NH 03302-0095

Re: Compliance with November 24, 2007, Consent Decree/  
Waste Control Evaluation Report on  
North Country Environmental Services, Inc. Landfill  
Standard Permit No. DES-SW-SP-03-002

Dear Mr. Wheeler:

This will respond to your letter of June 26, 2008, to North Country Environmental Services, Inc. (NCES) in which the department provided comments on the January 10, 2008, Waste Control Evaluation Report of Brown & Caldwell ("B&C") and also requested that NCES provide certain information.

With the department's concurrence, NCES retained B&C as an independent consultant to prepare the report in accordance with a consent decree issued by the Merrimack Superior Court in *State of New Hampshire v. North Country Environmental Services, Inc.* on November 24, 2007. While NCES cooperated with B&C's evaluation of NCES's waste inspection procedures, the report was the work of B&C exclusively. NCES did not review drafts of the report and received its copy of the report at the same time the department did.

Section 13 of the court's decree defines the department's role in evaluating the report:

The consultant's report, in both electronic and paper version, shall be simultaneously forwarded to NCES and to the Department. *The report may be posted on the Department's website to allow members of the public an opportunity to review the report and provide written comment. Within a reasonable time of its receipt of the consultant's report, the Department may request, in its discretion, revisions to the report's conclusions and*

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*recommendations.* The parties agree to discuss, promptly and in good faith, any issues raised by NCES or the consultant with respect to any of the Department's revisions and to cooperate to address and resolve such issues. The report will be modified to reflect the Department's revisions (with any changes resulting from any discussions among the Department, NCES, and the consultant), and the consultant shall then prepare a final "Waste Control Evaluation Report" which shall be submitted in both electronic and paper version to the Department within thirty (30) days of receipt of the Department's final revisions.

Emphasis supplied.

Under the foregoing language, there is no provision for the department to make comments and request information. Rather, the consent decree gives the department the opportunity to request revisions to the report's conclusions and recommendations. The department's June 26 letter, however, does not propose any specific language changes to the report. Instead, it contains a number of general comments, requests for information, and requests for conceptual changes to the report.

We also note that the consent decree gives the department a "reasonable time" within which to request revisions to the report. Even if the June 26 letter can be construed as a request for revisions, it was written over five months after receipt of the report. Given the other time limitations in Part D of the decree, we must reserve NCES's right to contest whether the state has complied with Section 13 of the decree.

Subject to the foregoing, NCES submits the following responses to the department's June 26 letter in the spirit of cooperation. The responses are numbered to correspond to the numbering in the department's June 26 letter. By responding to the department's comments, NCES does not waive any of its rights or assume any obligations beyond those specifically set forth in the consent decree.

1. In response to this comment, please see the enclosed memorandum from Brown & Caldwell.
2. This comment is already addressed in part by Section 7.0(3) on pages 30 and 31 of the draft operating plan. To address the remainder of this comment, NCES proposes to amend Section 7.0 of the draft operating plan as shown on the revised redlined draft.
3. The consent decree does not require that a description of how the scale house operator monitors traffic flow be incorporated into NCES's operating plan, and no such revision

was recommended in the report. Sections 3.2 and 3.3.1 of the draft operating plan already address most of this comment. NCES proposes to amend Section 3.2 of the draft operating plan as shown on the revised redlined draft to address the remainder of the comment.

4. NCES disagrees with the department's characterization of Section 2.2 of the report. The report states that a disproportionate number of inspections take place in the morning rather than later in the day. It does not state that a disproportionate number of inspections took place between 10/1/07 and 12/17/07 as compared to other time periods.

The department also requests "recommendations on how to conduct random inspections." NCES submits, however, that such recommendations are found in B&C's endorsement of the description of random load inspections found in NCES's draft operating plan. Report at § 4.2(6). NCES respectfully declines to respond to the remainder of paragraph 4 as beyond the scope of the consent decree.

5. NCES disagrees with the department's characterization of Section 4.1(7) of the report. Section 3 of the report states that "a small number of delivery vehicles associated with local routes have a higher occurrence of unacceptable waste delivery to the Facility." Section 4.1(7) states that the "Facility may consider requiring additional documentation from local generators/haulers producing C&D for disposal at the Facility." The department infers that Section 3 and Section 4.1(7) are referring to the same haulers and asks for an explanation of "how this conclusion was reached." The report, however, does not state the conclusion the department describes, and Section 4.1(7) does not refer to Section 3. In view of this clarification, the additional information request in paragraph 5 is moot and is beyond the scope of the consent decree in any event.

6. The department identifies what it believes to be an inconsistency between the draft operating plan and Section 3 of the report, which states that NCES personnel were "generally attentive in characterizing waste." NCES can find no inconsistency between the report and the draft operating plan. NCES is required, moreover, to conform its practices to the approved operating plan that is currently in effect. NCES is unaware of any basis for requiring it to comply with an operating plan that has not yet received approval from the department.

In addition, please note that B&C was hired both to assess current practices and to recommend improvements. B&C's description of current inspection practices in Section 3 was part of its assessment task, whereas its endorsement of elements of NCES's draft operating plan was part of its recommendation task. Thus, B&C described current practice and, as part of its recommendations for improvement, endorsed elements of the draft operating plan. In the context of the consent decree and B&C's assignment, there is no reason for the report to comment one way or the other on whether NCES's current practice conforms to the draft operating plan.

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7. NCES proposes to amend Section 3.3.6H of the draft operating plan as shown on the enclosed redlined draft.

8. NCES proposes to amend Section 6.6 of the draft operating plan as shown on the enclosed redlined draft.

9. The department notes that Section 1.1 of the report identifies the list of authorized wastes in the current facility operating plan as being incomplete but that this issue is not addressed in the specific recommendations set forth in Section 4.2. Although the issue is addressed in recommendations found in Section 4.1(1), NCES agrees that further mention should be made in Section 4.2 for the sake of clarity. In the enclosed memorandum B&C proposes a suitable amendment to the report.

10. The department expresses dissatisfaction with B&C's use of the words "improve" and "improvements" in Section 4.2 of the report and asks B&C to render a judgment on the adequacy of the draft operating plan in absolute terms. Section 12(b) and (c) of the consent decree, however, require B&C's report to make recommendations "*to improve* inspection, identification and rejection of prohibited waste" and to identify "[r]ecordkeeping and other methods *for improving* exclusion of prohibited wastes." Emphasis supplied. Thus, the report simply tracks the standard articulated in the consent decree. Accordingly, NCES submits that no revision of Section 4.2 is required in response to this comment.

11. This comment asks NCES to respond to all comments made by Thomas Roy of Aries Engineering. Mr. Roy has long served in an adversarial role against NCES as both a consultant and witness for the town.

As noted above, Section 13 of the consent decree provides that the department may post the B&C report on its website to give the public an opportunity to review the report and provide written comments. The consent decree does not require NCES to respond to public comments. Given that NCES has no obligation to respond to public comments and given Mr. Roy's years of collaboration with the town's lawyers in litigation against it, NCES respectfully declines to respond to Mr. Roy's comments.

The consent decree between NCES and the state is the product of many months of negotiation and discussion. While NCES wishes to cooperate with the department in the parties' performance of their respective obligations under the consent decree, it cannot agree to surrender any of its rights or expand its obligations under the decree.

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NCES is prepared to enter into discussions with the department regarding any of the foregoing responses pursuant to Section 13 of the consent decree, assuming that the department intended its June 26 letter to be a "request, in its discretion, [for] revisions to the report's conclusions and recommendations." Please inform us promptly if the department wants to hold such discussions.

Very truly yours,

A handwritten signature in cursive script that reads "Bryan K. Gould". The signature is written in black ink and is positioned above the typed name.

Bryan K. Gould, Esq.

BKG:bmb

cc: Maureen D. Smith, Esq.



151 Campanelli Drive, Suite B  
Middleborough, MA, 02346  
(508) 923-0879

**Date:** August 4, 2008

**To:** Karen Flanders, Dir. of Compliance, NCES

**cc:**

**From:** Alan Kirschner, P.E., Vice-President

**Subject:** Response to DES Comments (6/26/08)



Brown and Caldwell (BC) has reviewed the letter from Wayne Wheeler of the New Hampshire Department of Environmental Services (DES) to John Gay of NCES, dated 6/26/08. In that letter, DES provided comments to the Waste Control Evaluation Report (WCE) dated 1/10/08. NCES has asked BC to respond to Comment #1 and Comment #9 in DES's letter. Our response to each comment is set forth below.

I. Comment #1

As DES notes in Comment #1, BC found that NCES's waste acceptance and rejection procedures met Best Management Practice (BMP) standards utilized at solid waste disposal facilities. DES has now asked for a list of BMPs and a description of how NCES meets them.

Although not defined by the State of New Hampshire regulations, BC has used the terminology of BMPs to describe practical practices which, based upon BC's many years of experience observing and advising numerous clients on landfill operations, enable a facility to meet or exceed applicable requirements. BC identifies the following BMPs pertaining to waste acceptance and rejection procedures and describes how each was satisfied by NCES's procedures as observed at NCES's landfill in Bethlehem, New Hampshire (Facility).

	BMPs	BC's Observations
1.	Customers should be registered.	NCES requires that all customers register with the Facility prior to delivering waste to the Facility.
2.	Communications between the scale house and the lead operator should provide instruction or information pertaining to the type of waste and whether an inspection is recommended.	NCES personnel communicate between the scale house and the operators by radio to facilitate communication regarding the type of waste and inspections.
3.	Operators should observe waste as it is disposed of and then remove prohibited waste.	NCES's operators observed waste as it was expelled from delivery vehicles and removed prohibited waste from the active face of the landfill.

	BMPs	BC's Observations
4.	Waste should be deposited in a manner that facilitates visual characterization of waste.	Waste was deposited in shallow lifts enabling operators to visually characterize waste.
5.	At least 5% of incoming vehicles should be inspected daily.	A minimum of three vehicles are selected for inspection each day, which exceeds the 5% standard.
6.	A variety of vehicle types should be inspected.	NCES employs a guideline suggesting that one trailer, one roll-off container, and one local collection vehicle are inspected each day. The exact distribution by type of vehicle inspected varies depending on the specific circumstances at the Facility on a given day.
7.	In selecting vehicles for inspection, consideration should be given to the degree of risk that the vehicle contains prohibited waste.	In selecting vehicles for inspection, NCES's personnel consider the type of waste in the vehicle, the accounts serviced, and the customer's record of attempting to dispose of prohibited wastes at the Facility.
8.	Inspections should allow for adequate examination of the waste.	The operator executing the inspection diligently performs the task from a position allowing the best visual examination of the waste.
9.	Inspections should occur before waste is deposited on the operating face of the landfill.	NCES's inspections occur on the plateau above the operating face of the landfill. Acceptable waste is then placed on the operating face.

## II. Comment #9

In the WCE, BC noted that the list of authorized waste in the current facility operating plan was incomplete. Although BC addressed the issue in recommendations made in Section 4.1(c) of the WCE, DES has asked that recommendations be made in Section 4.2, Comments on the Draft Plan. Accordingly, BC proposes to insert a new Section 4.2(3) of the WCE immediately following current section 4.2(2) to read as follows:

Section 2.2 Prohibited Wastes should list prohibited waste in a manner consistent with the Facility permit. Should the Facility choose to list prohibited items which are not explicitly listed in the Facility permit, its list should remain consistent through all documentation and signage which convey information on prohibited wastes to customers or employees.

The current Sections 4.2(3) through 4.2(9) of the Report should then be re-numbered accordingly.

ARK:jrf

*Limitations: This memorandum was prepared solely for NCES in accordance with professional standards at the time the services were performed and in accordance with the contract between NCES and Brown and Caldwell dated December 7, 2007. This document is governed by the specific scope of work authorized by NCES; it is not intended to be relied upon by any other party except for regulatory authorities contemplated by the scope of work.*

CYN Environmental  
100 Tusco Drive  
Stoughton, MA 02072  
1-800-417-7455

Clean Harbors Environmental Services, Inc.  
20 Dunklee Road  
Bow, NH 03304  
1-603-644-3633

### **3.0 ROUTINE OPERATIONS PLAN**

#### **3.1 Hours of Operation**

Regular facility operating hours are from 7:00 a.m. to 3:00 p.m. Monday through Friday, and may be open from 7:00 a.m. to 12:00 p.m. on Saturday. The facility will be closed on Sundays and the following holidays: New Years Day, Thanksgiving Day and Christmas Day. Additionally, the facility may be closed on Memorial Day, Independence Day and Labor Day. Operating hours are expanded as necessary to meet actual disposal requirements of facility users but are restricted to the hours of 6:00 a.m. and 6:00 p.m. All routine landfill operations and inspections, maintenance, repairs, and monitoring under non-emergency circumstances are to be conducted between the hours of 6:00 a.m. and 6:00 p.m. unless otherwise approved by NHDES.

Leachate is generally removed from the facility during routine operating hours; however, from time to time (i.e., such as during the spring snow melt season) it may be necessary to remove leachate from the facility during the hours from 6:00 p.m. to 6:00 a.m.

#### **3.2 Access Control and On-Site Traffic Patterns**

Access to the facility is restricted by an electronically operated locking gate located on the access road to the scale house from Trudeau Road. (The electronic gate can only be accessed via a restricted access code. Upon exiting the site the gate closes automatically within one minute, site personnel do not leave the access area until the gate has securely closed.) Another potential access point to the facility is via the original access road from Muchmore Road located north of the landfill area. This abandoned access location has been blocked by a locked gate and boulders prohibiting vehicular access. NCES may establish additional security measures as necessary, including; motion activated video surveillance.



Signs are to be posted and maintained at the entrance road, gate and scale house indicating:

1. The facility name and permit number;
2. The name, address, and telephone number of the Permittee;
3. The hours of operation;
4. The types of wastes accepted; and
5. A statement that unlawful dumping shall be subject to fine and prosecution.

The scale house is occupied by NCES personnel during daily operating hours. The scale house operator is also responsible for monitoring traffic flow at the facility gate. The gate is to be locked at night and when the landfill is closed.

Access to the facility is gained through the Site entrance from Trudeau Road. The scale house is located near the entrance. Incoming vehicles (stop on the scale) and are weighed, then proceed to the landfill tipping area. The scale operator and equipment operators on the working face use a CB and/or two-way radio to communicate. When appropriate, the scale operator will inform the working face that a truck has been cleared to proceed to the tipping area and provide any specifics on the load or special handling. Operators use a CB radio to communicate with drivers and provide instructions as to where waste is to be discharged. After discharging their loads, drivers return to the scale and are weighed to determine the amount of waste disposed. A weight ticket is then printed by the Scale House operator and signed by the vehicle driver and the scale operator.

An access road is located around the facility. The location of access roadways to the active disposal area will vary depending upon the location of the active face at any given time. The landfill compactor operator has a CB radio and can contact trucks drivers to provide further instruction as to where waste is to be discharged.

### **3.3 Waste Review, Unloading and Inspection Procedures**

#### ***3.3.1 Waste Review***

NCES implements measures to restrict acceptance of prohibited wastes at this facility. Loads identified as having prohibited wastes (as listed in Section 2.2) are to be rejected as described in Section 6.5.

All waste delivery vehicles (excluding residential vehicles and pick-up trucks that solely use the drop-off station) stop at the scale prior to proceeding into the landfill. The scale operator identifies the customer and queries the customer's account in the facility's computer system or manually enters a customer's information. The driver of the vehicle identifies the type and origin of waste which is entered into the facility's computer system by the scale house operator prior to allowing the vehicle

## 7.0 EMPLOYEE TRAINING PROGRAM

NCES facility management and operating staff receive a variety of training. In addition to employee training, a trained Region Safety Manager and a Region Permits, Compliance and Engineering (PCE) Manager is available to all operational staff for assistance, advice and problem solving. The Region PCE Manager is trained in Hazardous Waste Operations and Emergency Response (HAZWOPPER) and the Landfill Manager is a certified Solid Waste Association of North America (SWANA) Manager of Landfill Operations (MOLO).

The operations management at the facility is to be provided by persons who are certified by NHDES for the level of responsibilities. At least one person on-site shall be a certified Level IV Operator. For every five operators (person directly involved in solid waste management activities), there is to be at least one Level III or Level IV Operator.

NCES provides regular and on-going training to all staff on job responsibilities, human resource matters, operations/equipment, health and safety, and environmental. Training is primarily done by qualified internal staff, however third-party consultants/experts, or certificate programs and seminars may be incorporated. Employee training is monitored by signature on training logs. Necessary job-related training is provided to new-hire employees. Training related to landfill operations staff includes:

### 1. Health and Safety

Training on a variety of Health and Safety related topics is provided primarily by on-site management. Generally training occurs once per month and ranges from ½ hour to 1 hour sessions depending on the topic.

### 2. Specific Technical Training on Operating Equipment and Procedures

The Landfill Manager will ensure employees are technically trained in proper equipment use prior to operation. On-site and off-site training is provided for staff and management on specific equipment from suppliers.

### 3. Facility Operating Plan

The Facility Operating Plan is reviewed annually by the Landfill Manager and Region PCE Manager. Facility Operations Staff are trained regularly and as necessary on various components of the Operating Plan. Within thirty days of NHDES approval of any changes to the Operating Plan, each employee will receive training with respect to any change related to the employee's responsibilities. Each training session will require attendees to sign a log

specifying the sections of the Operating Plan on which the operator received training.  
Employee familiarity with the Operating Plan is monitored through interaction with the instructor during training.

**a. Identification of Acceptable and Unacceptable Waste**

Annual training is provided to equipment/compactor operators in identification of acceptable and unacceptable waste (Hazardous waste, CFC's, asbestos, etc.). Training topics may include: definitions, what is unacceptable, identification practices, load inspection, handling procedures, and procedures for unapproved or unacceptable deliveries, contact information.

**b. Special Waste Training**

Annual training is provided to the Landfill Manager, sales representative, and equipment/compactor operators, involved in the management of special wastes, as applicable to their related duties. Additional training may be required when there are new handling requirements, new rules or policies, or new waste streams. Training topics may include: definitions, examples of special wastes, identification of special waste, special waste approval process, load inspection, handling procedures, and procedures for unapproved or unacceptable deliveries, contact information.

**c. Emergency and Contingency Plan Procedures**

The Emergency and Contingency Plan Procedures are reviewed annually by the Landfill Manager and Region PCE Manager. Facility Operations Staff are trained regularly and as necessary on various components of the Plan.

**4. Spill Prevention Control and Countermeasures (SPCC)**

Provided the Facility is required to have a SPCC Plan by 40 CFR 112, annually, discharge prevention briefings will be held for oil-handling employees on the SPCC Plan and emergency response procedures. In addition, the training includes a review of the NHDES criteria for reporting petroleum discharges and emergency contact information.

**5. Storm Water Pollution Prevention Plan (SWPPP)**

Provided the Facility is required to have a SWPPP by the US EPA National Pollution Discharge Elimination System (NPDES) Program, annually, storm water pollution

### 3.3.5 *Waste Unloading & Routine Inspection*

Once vehicles are in the disposal area, compactor operators visually inspect the waste as the vehicles discharge their load onto the working face. As refuse is spread at the working face, operators are to look for unacceptable materials [which may have been placed in the load. The facility's equipment operators are trained in identifying acceptable and unacceptable wastes and if necessary will contact their supervisor to view questionable materials.]

### 3.3.6 *Random Load Inspection*

In addition to the routine visual inspection of the waste as it is discharged at the working face, 5% of loads are chosen to be inspected more thoroughly on random basis. Consideration for random inspection is given based on the type of waste, accounts serviced, and whether the hauler has a record of disposing unauthorized wastes at the facility.

Random load inspections are performed by NCES personnel with NHDES Solid Waste Operator Certification trained (in identification of unacceptable materials.)

Random Load Inspection:

- A. An NCES representative will randomly select a hauler at the scale or the working face;
- B. The NCES Representative will notify the hauler of the random load inspection program and that he/she has been selected for an inspection;
- C. If the hauler will not allow the inspection, they will not be permitted to unload at the site;
- D. If the hauler will allow the inspection the scale house will notify operators at the working face and the truck will be directed to the designated random load inspection area and met by NCES representative(s);
- E. The load will be discharged in an area where it can be spread and visually inspected for unauthorized waste. The NCES representative shall thoroughly observe the waste and not handle the waste. A Load Inspection Form will be completed;
- F. Any unauthorized waste as identified in Section 2.2 of this document will be handled in accordance with Section 6.6 Receipt of Prohibited Waste and will be noted on the Load Inspection Form. The hauler will be given a copy of the inspection form if they

request it. A copy of the Waste Inspection Form is included in Appendix A;

G. Photographs may be taken of the unauthorized waste, truck or its contents;

H. Unauthorized waste will be segregated and handled according to Section 6.6 of the Facility Operating Plan;

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I. Any load identified as having a confirmable or suspected unauthorized waste will be documented on the Load Inspection Form. The hauler shall be sent a letter including photographs and an invoice for expenses associated with the management and proper disposal of any confirmed unauthorized waste. The hauler may be banned from future use of the facility;

J. Site personnel will file the report at the site where it will be available for NHDES review and will consist of:

- 1) The completed Load Inspection Form
- 2) Any photos
- 3) A copy of the scale ticket

K. Records are kept in accordance with procedures outlined in Section 8.0.

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Please refer to the contingency section for management of an unauthorized waste, Section 6.

### 3.3.6.1 Personal Protective Equipment for Random Load Inspections

Personal Protective Equipment (PPE) appropriate for the specific job, will be consistent with the current Health and Safety Program requirements for the Facility and periodically updated consistent with OSHA regulations.

### 3.4 Method for Tracking Waste Quantities

As indicated in Section 3.2, haulers bringing waste to the facility are required to stop at the facility scale for weighing prior to proceeding to the landfill. After off-loading, trucks return to the scale for reweighing to determine the weight of the waste left at the working face. After this second weighing, a scale ticket is generated and signed by the scale house operator and the driver of the vehicle. One part of the weight ticket is given to the truck driver while the other part is used for billing and record keeping purposes by the facility.

**Disposal** – The disposal methods would be the landfill or a permitted wastewater treatment facility.

## 6.6 Management of Prohibited Waste

When a prohibited waste stream is discovered, the procedure outlined below is to be followed:

- An unapproved special waste or other prohibited waste which is deposited on the working face and which does not appear to be an immediate threat to health or safety (e.g., whole tires, white goods, etc.) is to be isolated by the compactor operator. The customer is to be identified, and requested to remove the waste. If the source of the waste or hauler cannot be identified, NCES will evaluate the situation and implement appropriate procedures for the management of the waste. NCES staff will notify the Landfill Manager and PCE personnel immediately. The unauthorized waste will be separated and if appropriate, placed in a secure container. The unauthorized waste will be evaluated by trained personnel and characterized for proper disposal. If the waste is identified to be potentially hazardous, NCES staff will contact an authorized hazardous waste company as identified in Section 2.2.
- In the event a waste disposed on the working face is believed to present an immediate threat to health and safety (e.g., reactive chemicals, ruptured drums containing liquids), the waste is to be left in place undisturbed and NCES staff will immediately notify the Landfill Manager, PCE personnel and the NHDES. A company specializing in the handling of various waste materials such as Clean Harbors, Inc. of Bow, New Hampshire (1-603-224-6626) is to be contacted to evaluate the waste and to remove the waste for proper disposal. The waste is to be evaluated and characterized with respect to proper handling and disposal requirements and managed accordingly. Such waste is to be promptly transferred using licensed waste transporters and transported to a licensed disposal facility.
- The following table describes management of specified prohibited wastes. This list is not intended to be all inclusive, but a general tabulation of typical materials. The "Disposal/Transfer" vendor information is intended for reference only and may be modified by the Facility.

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<u>MATERIAL</u>	<u>TEMPORARY STORAGE LOCATION</u>	<u>WASTE CONTAINER TYPE</u>	<u>MAXIMUM DURATION ON-SITE STORAGE</u>	<u>DISPOSAL / TRANSFER</u>
Anti-Freeze	Maintenance Garage	Drum	< 1 year per Universal Waste Rules	Recycler
Asbestos	Near Working Face - Secure location determined at the time of incident.	Covered Dumpster / Roll-off or Trailer	Removed upon testing and proper management arrangements.	Alternate Disposal Facility
Batteries (Wet Cell)	Maintenance Garage	Storage Rack or Plastic Bin	< 1 year per Universal Waste Rules	Universal Waste Recycler
Batteries	Electronics Storage Shed	Drum	< 1 year per Universal Waste Rules	Universal Waste Recycler
Cathode Ray Tubes (CRT's)	Electronics Storage Shed	Labeled Cardboard Box	< 1 year per Universal Waste Rules	Universal Waste Recycler
CFC Containing Appliances	Designated Area	Roll-off	3-6 Months	Certified Technician removes CFCs. Recycler
Contained Gaseous (Propane Tanks)	Designated Area	Roll-off	3-6 Months	Littleton Town Transfer Station
Fluorescent Bulbs and Lighting Ballasts	Electronics Storage Shed	Labeled Cardboard Box	< 1 year per Universal Waste Rules	Universal Waste Recycler
Medical Waste (Untreated)	Near Working Face - Secure location determined at the time of incident.	Container it was shipped in / Dumpster / Roll-off	Removed upon testing and proper management arrangements.	Alternate Disposal Facility
Mercury Containing Devices	Electronics Storage Shed	Drum	< 1 year per Universal Waste Rules	Universal Waste Recycler
Motor Oil	Maintenance Garage	Drum	Removed upon testing and proper management arrangements.	Licensed Hazardous Waste Contractor
Tires - whole	Designated Area	Roll-off	3-6 Months	Recycler or Alternate Disposal Facility
Unidentified Waste that may be Hazardous	Where off-loaded, until identified. Secured storage per NHDES Solid and Hazardous Waste Division(s).	Container as recommended by DES and Contractor. Substance Dependant*	Removed upon testing and proper management arrangements.	Licensed Hazardous Waste Contractor
White Goods	Designated Area	Roll-off	3-6 Months	Recycler