OPERATION AND MAINTENANCE PLAN

Devens Recycling Center, LLC
45 Independence Drive
Devens, MA

Revised
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Prepared For:

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Operation and Maintenance Plan

Introduction

Green Seal Environmental, LLC (GSE) has prepared this Operations and Maintenance Plan (O&M Plan) on behalf of Devens Recycling Center, LLC (DRC) located at 45 Independence Drive in Devens, Massachusetts. This O&M Plan has been developed for the Facility to:

- Outline and document appropriate operations and maintenance procedures to be conducted during daily operations during permanent operations;
- Satisfy the O&M requirements set forth in the Massachusetts Solid Waste Management Regulations (310 CMR 19.000, Section 200); and,
- Provide guidance for general environmental monitoring protocols at the Facility.

In addition to the O&M Plan, DRC has also implemented "waste ban" tracking and documentation procedures as outlined in the Waste Ban Compliance Plan, which is a separate standalone document.

How to Use this Document

This document addresses the pertinent parts of the Massachusetts Solid Waste Regulations 310 CMR 19.200, which are presented in the order found within these Regulations. A Table of Contents is provided below.

Continued on next page

Table of Contents

Table of Contents

The following table directs the reader to specific sections within this document. The number that appears to the right of each title is the applicable part of the Regulation that is addressed.

Stormwater Controls

Introduction

This section addresses the Facility's compliance with 19.205 (1) Stormwater Controls. DRC is required to prevent erosion, the discharge of pollutants, protect the physical integrity of structures that "contain" the solid waste materials (pavement, buildings, etc.), and comply with the state's stormwater standards as well as any applicable local and federal requirements. This section also identifies maintenance and inspection procedures for employees who will be responsible for stormwater control equipment maintenance.

The operation will allow for all waste handling activities including tipping, processing, and loading to be inside the waste handling building and on an impervious concrete floor. Any contact water generated (primarily from dusts controls) is absorbed in the waste materials and/or directed to interior trench drains in the tipping floor area inside of the Facility building's overhead doors. Water collected in the trench drains is currently directed to a tight tank.

A description of the various components of the stormwater control system and the maintenance activities and schedule follows.

Continued on next page

Stormwater Controls, Continued

Stormwater Controls

The following major stormwater controls at the Facility operated and maintained by the Operator will help to mitigate stormwater impacts:

- Good housekeeping;
- Catch basins;
- Detention basins (removing sediment and overgrowth to maintain capacity);
- An infiltration system;
- Treatment swale;
- Asphalt pavement and berms;
- Riprap at pipe outlets;
- Trench drains in the waste handling building; and,
- Training.

Long-term Best Management Practices (BMPs) include sweeping of the paved areas to remove sediments and debris, and regular maintenance of the stormwater system.

Housekeeping

Good housekeeping and common-sense practices are important in preventing potential stormwater impacts. DRC requires that all employees will practice good housekeeping during their shifts. Good housekeeping consists of the following protocols on a daily, weekly, and monthly basis:

- Picking up litter and spilled material,
- Sweeping,
- Container management,
- Preventive maintenance,
- Following manufacturer maintenance schedules on engineering controls, and
- Implementing corrective actions within short timeframes.

Continued on next page

Stormwater Controls, Continued

Catch Basins

Catch basins collect, treat, and transport stormwater run-off to a grass lined detention basin, an infiltration structure, a nearby stormwater system or an outfall structure. The catch basins are located within the paved areas of the site, have deep sumps and are the first fixed points that will collect suspended solids and contain oil.

The catch basins should be inspected quarterly and cleaned semi-annually, at a minimum. More frequent cleaning may be necessary if sediment accumulates to within 6 inches of the outlet regularly or as observed during quarterly inspections. All sediment on the surface and debris should be cleaned up from the grate of the catch basin and surrounding areas to maintain the hydraulic efficiency of the inlets.

All sediments and debris are to be properly disposed. Additional cleaning may be required as a result of excessive sediments during construction of future improvements on site. The site contractor will clean all catch basins and drainage pipes at the end of construction, prior to leaving the site.

If	Then
there is no significant build-up within the catch basins,	do not clean, and continue inspecting each catch basin the following quarter.
the catch basin has not been cleaned in the last six months or if there is significant build-up,	clean out the collected materials.
there is a visible oily sheen on top of the water in the catch basin,	bring it to the attention of the Facility General Manager so corrective actions can be taken.

Continued on next page

Stormwater Controls, Continued

Stormwater Detention Basins

Stormwater on a portion of the site will be routed from catch basins to stormwater detention basins. The basins will be inspected for sediment build-up and oils, erosion and plant growth on a semi-annual basis.

Infiltration System

Stormwater will be routed from some of the site's catch basins to an infiltration system that is located south east of the waste handling building.

If	Then
the infiltration system is equipped with observation ports,	it will be inspected semi-annually and following significant rainfall events for debris and leaching effectiveness.
the infiltration system appears to be leaching slowly,	the leaching unit should be assessed by an engineer and will be repaired or replaced to achieve its necessary effectiveness.

Treatment Swale

Stormwater will be routed from some of the site's catch basins to a stormwater treatment swale located south of the waste handling building. Overflow from the infiltration system is also directed to this swale. This swale will be inspected for sediment, erosion, litter, subsidence, and general condition on a semi-annual basis.

Asphalt Pavement

Areas outside of the waste handling building where Facility activities occur are paved in order to collect stormwater and reduce the potential for generating dust and track-out of sediment. The asphalt surfaces direct stormwater into the various catch basins on the site.

Pavement is inspected on a monthly basis for damage. Damage will be repaired as soon as possible. All repairs will be documented.

Regular litter pick-up and sweeping of the asphalt surfaces will be conducted on an as-needed basis to help mitigate dust and sediment at the site.

Continued on next page

Stormwater Controls, Continued

Asphalt Berms

Asphalt berms are located at the perimeter of the pavement surfaces. These berms ensure that runoff from the paved surfaces is directed to the stormwater control and treatment system. If a berm becomes damaged, it will be brought to the attention of the Facility General Manager so that corrective action can be taken. The pavement berms will be inspected for the following:

- Damage;
- Cracking; and,
- Integrity.

Riprap at Pipe Outlets

The outfalls should be inspected after severe rainfall events for overall condition and evidence of sedimentation or erosion. If riprap exists at these outfalls, it should be assessed for integrity and repaired and/or reset as deemed necessary.

Training

As previously mentioned within this Plan, employee training will help DRC commit to sound operation and maintenance practices, and protecting health and safety and the surrounding environment. Periodic training and pre-employment training will occur to introduce controls and enforce compliance with operation and maintenance procedures.

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Stormwater Controls, Continued

Maintenance and Inspection Schedule

The table presented below outlines general maintenance, inspection, and service requirements for the stormwater management system.

Inspections	BMPs	Actions
Semi-Annual Inspections	Catch Basins	1. Remove grate. 2. Inspect structure for damage. 3. Measure sediment depth in sump. 4. Clean Sump (if sediment depth >6" or ¼ depth of sump, whichever greater).
	Infiltration Structure	1. Open observation ports (if equipped) at Infiltration Structure to confirm condition and performance. 2. If sediment observed in at bottom, clean in accordance with Manufacturer's or Engineer's recommendations. 3. If water is present and no storm events have occurred within 72 hours of the inspection, contact engineer to investigate.
	Detention Basins and Treatment Swale	1. Observe condition of each basin or swale. 2. Clean and/or repair as necessary. 3. Mow grass, if necessary. 4. If present, remove invasive plants. 5. If excessive, remove accumulated sediment.
Quarterly Inspections	Asphalt Pavement and Berms	1. Inspect for damage such as cracking and breakage. 2. Repair as necessary.
	Catch Basins	1. Remove debris from grate. 2. If excessive, remove accumulated sediment.
Monthly Inspections	Site, catch basins, outfalls, etc.	1. Refer to monthly inspection form.
After Significant Rainfall Events (within 48 hours)	Stormwater outfalls	1. Inspect for movement in rip rap, erosion, or sedimentation. Repair rip rap, repair erosion, and removed sedimentation, as necessary.
	Catch Basins	1. Remove accumulated debris/litter from the grate and immediate area, as necessary.

Equipment

Introduction

This section addresses the Facility's compliance with 19.205 (2) Equipment. DRC will maintain sufficient equipment in number and type to operate a large solid waste handling facility. The following section provides equipment information.

Equipment

The following table lists the types of equipment that may be used and describes their primary use.

Equipment	Stationary/Mobile	Use
Excavators	mobile	Materials management C&D, MSW, Bulkies
Front end loaders	mobile	Materials management MSW, C&D, Bulkies
Sweeper	mobile	Maintenance
Rail car mover	mobile	Internal movement of railcars
Processing Line	stationary	C&D material separation
Baler	stationary	Baling MSW and/or C&D Residuals
Shredders	mobile	Material reduction/seperation

Equipment Failure

In the event of equipment failure, most machines are able to perform multiple tasks to keep a steady flow of materials moving through the Facility. In case of an equipment failure, the Facilities General Manager will coordinate the proper maintenance to fix and/or replace malfunctioning equipment. Equipment can be rented and brought to DRC, if necessary.

Routine Maintenance

All equipment will be inspected regularly to ensure proper operation as recommended by the equipment manufacturer. Regular maintenance can occur inside the handling building. DRC will provide drip pans to catch equipment fluids during servicing and properly clean up spills occurring outside of the drip pan area.

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Equipment, Continued

Shelter	All equipment will be sheltered within designated equipment storage areas, which are located on paved surfaces or inside of the waste handling building.
Temporary Closure	DRC will maintain arrangements for providing standby equipment in the event of a significant equipment failure. If there is sufficient loss of equipment to warrant a shutdown (or temporary closure) of the Facility, DRC will not accept incoming materials until damaged equipment can be repaired or replaced.

Weighing Facilities

Introduction

This section addresses the Facility's compliance with 19.205 (3) Weighing Facilities.

Permit Conditions

The Facility is authorized to accept and transfer a combined maximum of 1,500 tons per day (tpd) of C&D and MSW (maximum 500 tpd), including Bulky Waste as defined at 310 CMR 19.006. As such, the operator must weigh all incoming waste, per 310 CMR 19.205 (3)(a).

Weigh Scales

Two truck scales are provided at the Facility (one for inbound trucks and one for outbound trucks). Trucks that enter and exit the Facility will be weighed at the scales. Traffic flow at the Facility follows an in and out direction so that any truck exiting the Facility, will follow the traffic flow to the outbound scale. DRC personnel will be responsible for weighing inbound and outbound materials for the Facility.

C&D Waste Handling Facility Requirements

Introduction

This section addresses the Facility's compliance with 19.206 Construction and Demolition (C&D) Waste Processing Facilities Requirements, which include:

- Indoor handling of C&D materials,
- Proper storage of processed materials, and
- Proper management of stormwater and water used for dust control.

C&D Waste Policy

All handling (unloading, storage, kick-sorting, etc.) of C&D waste will occur indoors at the DRC Facility. Both delivery and processing occur within the east side of the waste handling building. Please note that the C&D delivery area is separated from the MSW delivery area by a concrete wall.

All C&D waste and recovered or recyclable materials are stored in a manner that protects the public health, safety, and the environment. All processed C&D wastes (e.g., C&D fines and residuals) are stored inside of the waste handling building on impervious surfaces.

Stormwater Policy

All stormwater and water used for site operations is separately controlled, collected, and properly managed in accordance with all applicable local, state, and federal requirements. As stated previously, DRC will maintain all of their stormwater controls. Please note that a trench drain, located inside of the waste handling building just inside of the overhead doors (east side of the building) is connected to an inground tight tank that is serviced on a regular basis. The drain collects any residual liquids from within the building.

Handling Facility Operation and Maintenance Requirements

Introduction

This section addresses the Facility's compliance with 19.207, Handling Facility Operation and Maintenance Requirements, (1) General, which requires DRC to prevent pollution of groundwater, surface water, and air quality and prevent dust, odors, noise, and other nuisance conditions.

Procedures and Practices

The operators of the DRC Facility have incorporated procedures and practices, in accordance with approved plans and permit conditions that will prevent pollution of groundwater, surface water, and air quality and prevent dust, odors, noise and other nuisance conditions from developing.

The following pages describe these procedures and practices in detail.

Supervision of Operation

Introduction

This section addresses the Facility's compliance with 19.207 (2) Supervision of Operation, which requires the Facility to be under the supervision of a qualified, knowledgeable individual.

Supervision

Operations are supervised by the Facility's General Manager. The General Manager has a staff of qualified individuals that have demonstrated expertise in the field of waste and materials management.

Operators

All responsible individuals are knowledgeable regarding the solid waste regulations that are pertinent to operating DRC's Facility. As the solid waste regulations change, DRC intends to incorporate new policies and procedures into the day-to-day operations.

Inspectors

DRC has the following on-site during waste handling activities:

1. An inspector qualified to inspect loads for compliance with the Massachusetts Waste Ban, and
2. An asbestos inspector that has experience with load inspections and the identification of suspect asbestos containing materials (ACM).

Notification

MassDEP and Devens Enterprise Commission will be notified within twenty-four (24) hours of incidents or disruptions that occur at the Facility that could affect the public health, safety, environment, or operation of the Facility. Written 24-hour notification shall be faxed or emailed to:

- Contact person – Jim McQuade, Solid Waste Section Chief (Central MassDEP Region)
- Fax number - 508-792-7621
- Email address – james.mcquade@state.ma.us

During emergency incidents at the Facility, immediate notification will be provided to the MassDEP by telephone to James McQuade at 508-767-2759. At any other time, the DRC can call MassDEP's Emergency Hotline at (888) 304-1133.

Access to Facilities

Introduction

This section addresses the Facility's compliance with 19.207 (3) Access to Facilities, which requires DRC to maintain adequate access to and from the site while in operation and limit access to the site during off-hours.

Paved Surfaces and Driveway

Access to the tipping area can be gained from the southerly paved entrance driveway off Independence Drive. Traffic is directed from an inbound scale to the east side of the waste handling building where trucks back onto the tipping floor for offloading. Outgoing trucks follow the same route in reverse and exit over an outbound scale. The Facility parking lot is located to the south of the waste handling building.

Paved areas will be kept in good repair to help prevent dust and erosion, and to provide adequate access during inclement weather conditions. In the event that the paved areas become damaged, corrective actions will take place. Corrective actions may consist of the following:

- Repair,
- Temporary repair,
- Assessment,
- Documentation, and
- Notification.

Access & Gates

The Facility building has multiple overhead door entrances that will be closed and locked during non-operating hours. The access gates along Independence Drive will be closed and locked during non-operating hours. No other vehicular access points exist than those already noted.

Hours and Access Rights

The hours of operation will be posted at the Facility entrance and/or scale-house. The current hours of operation are Monday through Friday from 7:00 AM to 5:00 PM and Saturday from 7:00 AM to 1:00 PM.

Security

Introduction

This section addresses the Facility's compliance with 19.207 (4) Security, which requires DRC to prevent access to the site when not in operation.

Security

The following measures will be taken when the Facility is closed and no DRC personnel are on site:

- All keys are removed from equipment and stored in the scale house trailer,
- All equipment is closed and locked,
- The doors to the waste handling building and scale house are closed and locked, and,
- The access gates to the Facility are closed and locked.

Lighting

The Facility is equipped with adequate lighting to deter vandalism during hours when the Facility is not in operation.

Posting of the Handling Facility

Introduction

This section addresses the Facility's compliance with 19.207 (5) Posting of the Handling Facility, which requires DRC to post signs with the Facility's information.

Signage

DRC has posted signs at the access points to the Facility, which includes the following information:

- The name of the owner and operator,
- A 24-hour emergency telephone number,
- The hours of operation,
- A list of solid wastes banned or restricted pursuant to 310 CMR 19.017,
- Other limitations and conditions of access to the Facility, and
- Penalties for unauthorized access.

Unloading Refuse

Introduction

This section addresses the Facility's compliance with 19.207 (6) Unloading Refuse, which requires DRC to continuously supervise unloading activities.

Unloading Process

DRC staff members, that have received appropriate training, will direct all unloading activities. Directing unloading activities includes:

- Directing traffic,
- Assisting drivers with unloading,
- Inspecting loads for unacceptable materials,
- Answering delivery procedure questions,
- Maintaining environmental integrity of the tipping areas,
- Responding to emergency situations, and
- Identifying potential nuisance conditions.

Special Wastes

Introduction

This section addresses DRC's compliance with 19.207 (7) Special Wastes, which prohibits the Facility from accepting "Special Waste" (e.g., asbestos, infectious waste, wastewater treatment sludge, drinking water treatment sludge and industrial process wastewater treatment sludge).

Storage

DRC will not accept, process, compost, or stockpile wastes that are not identified within their existing MassDEP permits. Procedures have been formulated and implemented through staff training to detect and reject special wastes.

Asbestos Management

Asbestos may potentially be in C&D materials delivered to the Facility. The MassDEP requirements regarding asbestos are designed to eliminate those materials prior to processing, and to verify adequacy of the visual screening process using laboratory analysis. By reducing the potential for asbestos containing materials DRC can:

- Protect the environment such as the air and receptors in and around the facility,
- Prevent non-compliance, and
- Save DRC from costly shutdowns and operational permit re-negotiations.

DRC will follow the procedures outlined within the current MassDEP's Asbestos Inspection Protocol for Solid Waste Facilities which will be appended to the ATO permit.

Please note that MassDEP is continually revising policies and procedures regarding asbestos management at C&D debris processing and handling facilities.

Screening

A properly trained, qualified Asbestos Inspector will inspect all incoming C&D debris loads. Once inspected, suspect asbestos-containing materials (ACM) may be separated and stored until confirmatory laboratory analysis (via polarized light microscopy - PLM) is received and reviewed. Note that all separated ACM will be stored within the waste handling building.

Continued on next page

Special Wastes, Continued

Employee Obligations

All DRC employees involved in the sampling of ACM must be familiar with this document and operational permits. They will need to fully understand these documents in order to:

- Enforce DRC's policies,
- Comply with MassDEP regulations, and
- Be able to prevent a problem before it occurs.

Training

Those employees selected for asbestos training and licensing/certification will have to undergo the training prior to conducting sampling activities at DRC.

About Asbestos

Asbestos is a naturally occurring fibrous mineral. During mining and processing, asbestos breaks down into very small fibers. These fibers are mixed during production of commercial goods with other materials that bind the asbestos together (e.g., brake linings, insulation, etc.). The use of asbestos in building materials was highest from the 1950s into the 1970s until it's manufacture and use was banned by the federal government.

There are six types of asbestos. The type of asbestos known as Chrysotile makes up approximately 95% of all the asbestos used in the United States.

Use of Asbestos

Asbestos had many uses and applications within building materials. The following list provides a brief description of some of those uses.

- Surfacing Materials – spray on acoustical or fire proofing,
- Thermal Insulation – pipe wrap, fittings, boilers, and
- Miscellaneous Materials – floor tiles, ceiling tiles, transite panels, and asphalt shingles.

Continued on next page

Special Wastes, Continued

Friable ACM

The term "friable ACM" refers to ACM that can be easily crushed, crumbled, or pulverized by hand pressure. This is often the most hazardous type of ACM due to the easy release of asbestos fibers into the air. Examples of some friable asbestos include:

- Plaster,
- Wallboard,
- Joint compound, and
- Thermal insulation for heaters and pipes.

Non-friable ACM

The term "non-friable ACM" refers to other ACM that cannot be easily crushed, crumbled, or pulverized by hand pressure. Non-friable ACM typically contains a binder or hardening agent such as cement, asphalt, or vinyl. The following includes examples of typical non-friable ACM:

- Asphalt roofing materials,
- Vinyl asbestos flooring tiles, and
- Transite siding made with cement.

Please note that these materials can become friable during demolition activities. Since DRC will be routinely accepting asphalt roofing materials, it is important to recognize the condition of the materials when they enter the waste handling building. Furthermore, appropriate safety precautions need to be employed by DRC personnel during sampling and processing (and if necessary, disposal) if suspect asbestos is discovered within an incoming load of C&D.

Equipment Needed

The following is a list of materials/supplies that may be needed each time a suspect asbestos sample is collected from incoming loads and the stockpile area:

- Personal protective equipment (PPE), including, but not limited to disposable gloves,
- A knife,
- A permanent marker,
- Collection containers,
- A water spray bottle,
- Chain-of-custody form.

Continued on next page

Special Wastes, Continued

Definition of a Grab Sample

A grab sample is the collection of a "piece" of a material for analysis. Unlike a composite sample (which is a mixture of several grab samples), a grab sample consists of a single piece of material collected during a single sampling event.

Incoming Load Sampling Procedures

Suspect ACM entering the DRC Facility will likely arrive commingled in mixed C&D loads. Grab samples will be collected from the suspect material. Each grab sample will be individually containerized and labelled. For a PLM analysis, double bagging samples with two Ziploc-type plastic bags will satisfy the container requirements.

Please note that if there is a positive result for asbestos, the entire load or container will be considered to be ACM unless further separation and analysis occurs and proves otherwise.

Sampling Procedure (grab sample)

The following step action table outlines the procedures that trained DRC personnel will employ when collecting grab samples for asbestos analysis.

Step	Action
1	Wet down (saturate) the suspect material.
2	Break off a 2" by 2" piece and place into a sample bag, then put that bag into a second bag; label the outer bag with the: • Date, • Time, • Origin (project name/location), • Sample name, and • Other required laboratory information. Close the sample bags and place in a secure area until laboratory pickup or delivery to a laboratory.
3	Wash off hands and throw away disposable gloves in the trash.
4	Fill out a chain-of-custody form

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Special Wastes, Continued

Testing

The samples collected at DRC are submitted to a laboratory and analyzed for asbestos type and percentage via EPA's PLM method. Please note that the laboratory is responsible for all QA/QC sampling and analysis of the incoming samples from DRC.

Positive Results

The following sections will outline DRC's action plan should "positive" Asbestos Containing Materials (ACM) be reported in samples collected at the DRC facility. Suspect ACM materials entering the Facility are either stockpiled or containerized in MassDEP approved staging areas. DRC has properly trained personnel on site for ACM management.

Training

Asbestos awareness training is provided to DRC personnel that may be in contact with ACM. The training consists of the following:

- Types of ACM materials likely to be encountered,
- Friable materials,
- Non-friable materials,
- Associated health hazards, and
- PPE.

Asbestos Inspectors

DRC personnel directly involved with the inspection and sample collection of suspect asbestos containing materials are required to obtain the proper asbestos training and certification. Asbestos Inspectors are responsible for:

- Employee awareness training,
- ACM stockpiling or containment,
- Sample collection and preparation,
- Inspection forms; and
- Record keeping.

Continued on next page

Special Wastes, Continued

Containment

If visual inspection indicates that a load contains highly suspect ACM or a laboratory reports asbestos in a sample, the load will be segregated and will be rejected. The load will be transferred to an asbestos-permitted landfill for appropriate disposal. Please note that ***highly suspect*** materials will not be accepted at the Facility. Also note that the material may either be already containerized or stockpiled. Instructions for the safe disposal of containerized verses non-containerized friable or non-friable ACMs are outlined below.

Non-friable ACM Removal

If non-friable highly suspect ACM is discovered then the inspector can perform one or more of the following:

- Wet the material down and reject the load,
- Segregate and handle the suspect materials after which the remainder of the load can be handled, or
- If highly suspect ACM is co-mingled in the load and accepted by the facility rather than rejected, classify the load as Asbestos Containing Waste Material (ACWM). The load will then be covered with 6-millimeter polyethylene sheeting and either handled as asbestos waste by a licensed asbestos contractor following all abatement and notification procedures, or isolated and sampled for laboratory analysis until the presence of asbestos is confirmed or denied. If denied, the load can be commingled with the other C&D.

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Special Wastes, Continued

Non-friable ACM Removal, continued

If the material is deemed "positive," the load and/or segregated material must be quarantined, wetted, covered in 6-mil polyethylene, and identified with asbestos warning signs/barrier tape. DRC will also immediately call an appropriately licensed asbestos contractor to remove the entire load as asbestos containing waste material. DRC or its retained asbestos contractor will also immediately call the MassDEP Central Region office Hotline (888-304-1133) to obtain an emergency waiver number to manage the load and will follow-up with an Asbestos Notification Form 001 ("ANF-001") as required by 310 CMR 7.15. DRC will ensure that the ACWM is properly and promptly removed from the facility and disposed according to applicable regulations.

Friable ACM Removal

In the event that friable materials are positively identified (***containerized or non-containerized***), MassDEP will be notified. Trained DRC personnel will wet the material down, isolate, cover, and label the material as ACM. DRC will contact a DOL-listed asbestos contractor to further handle and dispose of the ACM at an approved landfill.

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Special Wastes, Continued

Asbestos Disposal	If ACM is positively identified by either visual inspection or laboratory analysis within a load of asbestos containing materials, the materials will be disposed of and not recycled. If a load contains a mixture of suspect asbestos and non-asbestos containing materials, the entire load will be considered suspect ACM and rejected.
Record Keeping	DRC will retain asbestos laboratory reports on file at the Facility for three (3) years. Segregated asbestos containing materials (containerized or non-containerized) will be tracked and tracking information be readily identifiable by laboratory chain-of-custody records, weigh scale tickets and shipping manifests. This will allow for DRC personnel to directly correlate specific samples to containerized and non-containerized asbestos containing materials and to the haulers that delivered the materials. DRC will similarly retain employee-training records, weigh scale tickets, inspection forms and shipping manifests for a period of three (3) years.
Notification	In the event that asbestos is positively identified, MassDEP will be immediately notified by phone and a written report to follow within 24 hours or other notification requirements as required by MassDEP. In addition, the company that hauled the waste to the Facility is to be immediately notified by phone. All notifications are to be documented by DRC and become part of the handling record for that waste.

Banned or Restricted Solid Wastes

Introduction

This section addresses the Facility's compliance with 19.207 (8) Banned or Restricted Solid Wastes, which requires DRC to prohibit the disposal and/or transfer for disposal of certain materials. In addition to the information within this O&M Plan, please refer to the Waste Ban Compliance Plan for specific information on waste ban materials.

Banned or Restricted Waste

Banned or restricted wastes cannot be disposed at landfills in Massachusetts. However, it should be noted that these materials are frequently contained within the C&D waste stream. These materials must be removed from the waste stream and handled properly. Banned materials include the following:

- lead batteries
- leaves
- white goods
- tires
- metal containers
- glass containers
- asphalt, brick, and concrete
- commercial organics
- textiles
- paper/cardboard
- cathode ray tubes
- plastic products
- aluminum
- wood
- asbestos containing materials
- mercury containing devices
- clean gypsum
- mattresses

Notes:

1. All of the aforementioned materials will be handled, stored, and recycled following MassDEP required practices, policies, and regulations.
2. Banned items will be removed from the MSW and C&D waste streams to the maximum extent possible and sent for further recycling in-state or disposal out of state.
3. Inspections must be performed following the Waste Ban Compliance Plan for MSW materials as well.

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Hazardous Waste

Introduction

This section addresses DRC's compliance with 19.207 (9) Hazardous Waste, which prohibits the Facility's operators from handling any material subject to the Massachusetts Hazardous Waste Regulations (310 CMR 30.000) and requires DRC to establish a program for the detection and exclusion of hazardous wastes.

Definition

Hazardous Waste is defined per 310 CMR 30.010 as "a waste, or combination of wastes, which because of its quantity, concentration, or physical, chemical or infectious characteristics may cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness or pose a substantial present or potential hazard to human health, safety, or welfare or to the environment when improperly treated, stored, transported, used or disposed of, or otherwise managed." Hazardous wastes include those wastes that are specifically listed as hazardous waste, such as solvents and wastewater treatment sludge; or exhibit characteristic hazardous waste properties of ignitability, corrosivity, reactivity, or toxicity. Typical hazardous wastes that may be encountered in the MSW and C&D waste streams include the following:

- Waste Oil (MassDEP defined Hazardous Waste) and spent oil filters,
- Antifreeze,
- Solvents,
- Lead-acid batteries,
- Oil-based paints and stain, and
- Pressurized aerosol cans.

Universal Wastes are hazardous waste managed under the universal waste requirements. The following materials have been classified as "Universal Waste":

- Batteries,
- Pesticides,
- Mercury containing thermostats,
- Mercury containing devices, and
- Mercury containing lamps.

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Hazardous Waste, Continued

Definition, continued	It should be noted that 310 CMR 30.00 recognizes that not all batteries, pesticides, and lamps are hazardous waste, and therefore, do not qualify as universal wastes; such wastes may instead be managed as non-hazardous solid wastes.
Acceptance	DRC will not accept universal or hazardous wastes. However, there are instances when those wastes may be found within mixed loads. Those wastes are segregated by type in labelled containers for future disposal. Policies and procedures have been formulated to manage universal and hazardous wastes.
Detection and Segregation	DRC will visually inspect loads for incidental hazardous wastes mixed in with delivered loads of solid waste. If hazardous wastes are found, they will be segregated from the load, assuming it is safe to do so, and stored in appropriate containers until final disposal can be arranged. If hazardous wastes are detected in a load prior to tipping, the vehicle will be rejected and prevented from tipping at the Facility. DRC will store only universal or hazardous wastes that have been received incidental with delivered loads. Those wastes are segregated by type in labeled containers for future disposal. Internal policies and procedures have been formulated to manage universal and hazardous wastes.
Notification	DRC will notify the MassDEP within 24 hours of the discovery of material subject to 310 CMR 30.000.

Household Hazardous Waste and Waste Oil

Introduction

This section addresses DRC's compliance with 19.207 (10) Household Hazardous Waste and Waste Oil Collections at Handling Facilities, which requires the Facility to notify the MassDEP prior to the collection of hazardous waste and waste oil.

Policy

DRC will not accept household hazardous waste or waste oil at the Facility.

Bulky Waste

Introduction

This section addresses DRC's compliance with 19.207 (11) Bulky Waste, which allows the Facility to accept bulky waste if the handling of such wastes is consistent with the Facility's Site Assignment and/or permits and if the handling of bulky waste can be carried out in a manner which is manageable and compatible with the Facility's O&M Plan and environmental control systems.

Policy

DRC will accept, stockpile, process and dispose of bulky waste as set forth in their operating permits.

Bulky waste accepted at DRC will not include the acceptance of brush.

Liquid Wastes

Introduction

This section addresses DRC's compliance with 19.207 (12) Liquid Wastes, which prohibits the handling of liquid wastes at the Facility. With the exception of septage, contained liquid wastes generated by and produced in the normal operation of a household will not be considered to be liquid waste unless expressly excluded through 310 CMR 19.017: Waste Bans.

Policy

No liquid wastes are accepted and/or managed at the Facility.

Bird Hazards

Introduction

This section addresses DRC's compliance with 19.207 (13) Bird Hazards, which requires the Facility operator to minimize, to the extent practicable, the potential for the Facility to pose a bird hazard to aircraft.

Potential for Bird Hazards

C&D materials do not provide an adequate food source and should therefore not attract birds and other vectors. Although MSW is also accepted at the Facility, it will be handled completely within the enclosed waste handling building and will be covered before leaving the building in trucks and/or rail cars, significantly limiting the potential for attracting birds.

As with dust, litter, and the control of other potential nuisance conditions, confining operations to indoors; and closing the doors as practicable and when the facility is closed will help control the potential for vectors.

Dust & Odor Control

Introduction

This section addresses DRC's compliance with 19.207 (14) Dust Control, which requires the Facility to undertake suitable measures to control dust wherever and whenever necessary at the site, the access road, and any other areas related to or under control of the operator to prevent nuisance conditions. This section also addresses odor control.

Passive Controls

DRC will passively control dust and odors using several methods:

- Paving vehicle traffic areas, and
- Handling material within the enclosed waste handling building.

Active Controls

DRC will actively control dust and odor using several methods:

- Operation of a misting system,
- Manual wetting of materials (as needed),
- Wet sweeping,
- Periodic clean-up during the day,
- Clean-up at the end of the day and/or shifts, and
- Halting operations, as necessary.

Paved Vehicle Traffic Areas

The access ways to and from the Facility are paved. Maintaining the pavement will reduce the likelihood for dust to accumulate and blow around the site causing a nuisance condition. Paving will allow DRC to "wet sweep" the pavement during dry periods of the year as a preventive measure.

Building

The waste handling building provides an area for indoor tipping and inspection of incoming loads. Indoor tipping and inspection will help stop winds from blowing across tipped loads in an unobstructed manner.

Sweeping

DRC will maintain a sweeper to sweep the site. Sweeping will occur as needed to prevent nuisance dust on the paved surfaces. Sweeping will likely occur constantly during the day (on dry days) and at the end of each day.

Continued on next page

Dust & Odor Control, Continued

Misting System	A misting system exists inside the waste handling building over the C&D and MSW tipping areas and is effective for managing dust and odors. The atomized misting system (high pressure and low flow) helps minimize the generation of leachate on the tipping floor. DRC adds Atmos Vapor Neutralizer W SL5000 or equivelent to the misting system to further control odors.
Manual Wetting of Materials	On dry days or when loads of dusty materials are delivered (i.e., drywall), DRC will wet down the loads on the tipping floor and indoor storage areas. This method of reducing dust generation during the tipping and inspection process for excessively dusty materials augments the misting system.
Periodic Clean-up	Periodic clean-up will occur daily during periods of low activity. Machinery will adjust and maintain stockpiles.
End of Day Clean-up	Clean-up of the waste handling areas will occur at the end of each day. Periodically, stockpiles will be consolidated and adjusted, debris picked up, and the tipping floor will be scraped clean. The MSW handling area will be cleared regularly
Halting Operations	DRC has instituted a Contingency Plan for dust generation. If control systems are overwhelmed or fail in high dust conditions, machinery will be shut down and operations halted. Dust will be knocked down with hand held hoses. When dusty conditions have abated, operations will resume. DRC utilizes a routine site monitoring checklist to further address and mitigate potential dust and odors and other potential nuisance conditions. The checklist is included as Attachment 1 of the O&M Plan.

Vector Control

Introduction

This section addresses DRC's compliance with 19.207 (15) Vector Control, which requires the Facility to take preventative measures to maintain conditions unfavorable for the attraction or production of insects, birds, rodents, and other vectors.

Policy

DRC maintains an established relationship with a vector control company. This company is available for consultations and site visits as deemed necessary to control any on-site vector concerns. Currently, the vector control company services the DRC facility on a weekly basis. A qualified and licensed individual will conduct any application of pesticides or rodenticides.

Vector Mitigation

DRC will mitigate vectors at the Facility utilizing the following measures, as needed:

- Contracting with a vector control management firm (ongoing),
- Installing rodent traps/bait stations in and around the interior and exterior of the waste handling building,
- Closing overhead doors when the facility is not in operation,
- Conducting all waste handling activities indoors, and
- Sweeping the paved access areas at regular intervals.
- Quick loadout of MSW materials from the tipping floor

Enhanced Measures if Deemed Necessary:

- If necessary, DRC shall increase the frequency of inspections by vector management firm.
- If necessary, DRC shall authorize vector management firm to use other methods for vector control such as alternative traps, and "sterilization" techniques.
- DRC shall provide written reports on evaluations and modifications as deemed appropriate.

DRC utilizes a routine site monitoring checklist to further address and mitigate potential vectors and other potential nuisance conditions. The checklist is included as Attachment 1 of the O&M Plan.

Control of Wind-blown Litter

Introduction

This section addresses DRC's compliance with 19.207 (16) Control of Wind-blown Litter, which requires the Facility to prevent the scattering of refuse and wind-blown litter, including incorporating litter fencing, natural barriers, or other devices to prevent the scattering of solid waste beyond the Facility.

Procedure

DRC employees will inspect the Facility daily for material which could disperse due to windy conditions. If materials are found, they are picked up for proper disposal. To reduce the potential for windblown litter and material dispersion, all waste material and recovered recyclable material will be stored inside the waste handling building. Perimeter fencing will help control windblown litter from leaving the site.

Staffing

Introduction

This section addresses DRC's compliance with 19.207 (17) Staffing, which requires the DRC to ensure that the Facility is provided with an adequate number of trained staff.

Trained Staff

DRC will employ an adequate number of trained staff to make certain that the Facility is operated and maintained as designed, and in accordance with good solid waste management practices.

During hours of operation, the Facility General Manager or Operations Manager (or a trained designee) will be continuously present to monitor operations.

Employee Facilities

Introduction

This section addresses DRC's compliance with 19.207 (18) Employee Facilities, which requires DRC to provide proper shelter and facilities for on-site employees.

Shelter and Facilities

DRC provides employees with shelter and facilities that contain sufficient light and heat, a safe drinking water supply, sanitary hand washing, and toilets.

Accident Prevention and Safety

Introduction

This section addresses DRC's compliance with 19.207 (19) Accident Prevention and Safety, which requires all DRC employees to be instructed in the principles of first-aid and safety, and requires there to be adequate first-aid supplies, two-way radios or telephones, and posted signage with emergency telephone numbers at the Facility at all times.

First Aid

At all times during operations, a trained individual will be on-site to administer first aid. First aid supplies are provided in designated areas on site.

Safety

All employees will be trained to work safely. During orientation safety procedures are taught to employees with respect to each position and the hazards that they may encounter while working at the Facility. Typical training consists of the following:

- Weekly meetings,
- Scenario response,
- Pre-employment training, and
- On-going training.

Fire Protection

Introduction

This section addresses DRC's compliance with 19.207 (20) Fire Protection, which requires the Facility to take suitable measures for the prevention and control of fires.

Water Supply

DRC is supplied with municipal water and has fire hydrants on site in the front(south) and back (north) sides of the waste handling building.

Hot Loads

DRC has "zero tolerance" for the acceptance of "hot loads" at the Facility. In the event of a hot load entering the facility, trained individuals will be on-site to reject, report, and carry out emergency response procedures, which will maintain the integrity of the Facility.

Sprinkler System

DRC maintains an indoor overhead dry fire suppression system in the indoor tipping and waste storage areas. The waste handling building is also equipped with a local fire alarm system. If a fire occurs at the Facility, the automated fire suppression system will be activated to assist in extinguishing the fire and the fire alarm will notify DRC personnel and the Devens Fire Department. DRC personnel are trained to contact the Devens Fire Department should an emergency occur.

In the event of a fire at the DRC facility, the following agencies will be contacted:

- Devens Fire Department: 911
- MassDEP, Solid Waste Section Chief: (508) 792-7650

Continued on next page

Fire Protection, Continued

Fire Extinguishers	Fire extinguishers are mounted in strategic locations throughout the material handling building. All fire extinguishers are charged, inspected, and serviced on a regular basis following manufacturer's recommendations and OSHA regulations. Fire extinguishers are located on all mobile equipment and the operators are properly trained to use them in the event of a fire. All new employees will be trained on the presence and use of fire extinguishers located on-site.
Fire Department	In the event of a fire and/or accident, the Devens Fire Department will be called (911) for emergency services. Emergency phone numbers will be placed near all phones at the facility. All employees receive training for whom to call during an emergency situation.

Recycling Operations

Introduction

This section addresses DRC's compliance with 19.207 (21) Recycling Operations, which requires the Facility to make provisions for the recycling of materials provided that a definite plan or procedure is implemented and followed to enable the operation to be carried out in an organized, sanitary, orderly, and dependable manner.

Furthermore, 19.207 (21) requires that containers or areas used for the storage of recyclable materials are clearly identified and maintained in a clean and sanitary condition and accumulated recyclable materials are removed from the facility at least every 60 days, and discourages the accumulation of recyclable materials of a nature or in quantities that cause odor or pose a threat to the public or the environment.

Policy

The purpose of the Facility is to consolidate MSW and transfer to a disposal point and to also process C&D for recycling and transfer, while complying with MassDEP's Waste Ban and recycling rate policies. DRC processes Category 1 & 3 C&D materials. DRC will separate zero-tolerance waste ban items, as required. DRC intends to meet MassDEP's Minimum Performance Standards and recycle waste ban materials entering the Facility to the greatest extent possible.

Records for Operational and Plan Execution

Introduction

This section addresses DRC's compliance with 19.207 (22) Records for Operational and Plan Execution, which requires DRC to maintain a daily log that records operational information, including but not limited to the type and quantity of solid waste received and the status of Facility environmental control or monitoring systems.

Record Keeping

DRC will maintain the following operating records:

- The total daily tonnage of material accepted at the Facility during each calendar month,
- The daily tonnage of material sent from the Facility, itemized as the daily tonnage of waste sent from the facility for disposal, and
- The daily tonnage of material sent for recycling or further processing.

Operating records will be maintained at the Facility for a minimum of two (2) years and will be made available for inspection by MassDEP personnel upon request.

Annual Reporting

DRC will submit to the MassDEP, no later than February 15th of each calendar year, an annual report on a form provided by MassDEP summarizing the Facility's operations for the previous calendar year. The annual report typically describes and summarizes the following:

- The quantity of materials accepted during the calendar year,
- The quantity of materials diverted for recycling/reuse and disposal including the receiving location, and
- Waste Ban inspection information.

Screening and/or Fencing

Introduction

This section addresses DRC's compliance with 19.207 (23) Screening and/or Fencing, which requires that the Facility be suitably screened by fencing, or other approved methods, to shield the area from adjoining properties.

Facility

All material handling will occur inside the waste handling building. The Facility is located on an industrially zoned parcel in the Devens Regional Enterprise Zone, which was formerly part of the Ft. Devens military base. Trees screen the Facility to the north and south from the abutting landfill (north) and Independence Drive (south). The Facility is surrounded by fencing and is abutted by other commercial and industrial buildings to the west and east within the Enterprise Zone. The Facility is effectively screened to the east and west by fencing.

If there are complaints, recommendations, and/or future requirements by MassDEP, DRC will assess and determine the most effective corrective action(s).

Open Burning

Introduction

This section addresses DRC's compliance with 19.207 (24) Open Burning, which prohibits the open burning of any refuse, including brush, wood, or diseased trees at the Facility at any time of the year except as may be expressly permitted by MassDEP.

Policy

DRC does not intend to burn any materials on-site without prior consent of MassDEP or the Devens Fire Department.

Inspections

Introduction

This section addresses DRC's compliance with 19.207 (25) Inspections, which requires the Facility to be inspected by a qualified environmental professional approved by MassDEP on an approved frequency.

Monitoring of Environmental Controls

DRC will inspect and monitor environmental controls on a daily basis to ensure compliance with permits (ATO, Site Assignment, etc.) and all applicable regulations. DRC will maintain records including, but not limited to the following:

- Description of operational problems or difficulties encountered or other deviations from the approved plans and operating procedures, and
- Description of actions taken, or to be taken, to mitigate and/or correct operational problems or difficulties encountered or other deviations from the approved plans and operating procedures.

DRC will retain a MassDEP-registered third-party inspector to conduct third party inspections as required by 310 CMR 19.018.

Note: Inspections are performed following the 310 CMR 19.200 requirements.

End of Life Mercury Products

Introduction

Pursuant to 19.207 (26) End-of-Life Mercury Products – Mercury-added products that are hazardous waste pursuant to 310 CMR 30.000: *Hazardous Waste* will be handled in accordance with this regulation. Mercury-added products that are not hazardous waste will be handled in accordance with 310 CMR 76.05(2).

Monitoring

DRC will inspect loads for mercury containing products such as, but not limited to:

- Fluorescent light bulbs,
- LCD screens,
- Thermostats, and
- Older appliances that may contain mercury.

These items will be removed from the material stream and segregated for off-site recycling and/or disposal, as necessary. DRC will coordinate with an environmental consultant and/or hazardous waste contractor if materials entering the Facility are deemed hazardous or are potentially hazardous.

Devens Recycling - Routine Site Monitoring

DATE:_____ **TIME:**_____ **INSPECTOR:**_____	**X = Satisfactory** **NA = Not Applicable** **O = Repair or Adjustment Required** **C = See Comments section** **Y = Yes** **N = No**

Vectors(s) ____ Bait stations placed around building ____ Bait stations serviced weekly ____ Vector complaint(s) lodged by abutters ____ Rat burrows observed ____ Rats observed ____ Corrective action needed Remedy_____	**Odor(s)** ____ Misting/odor system functional? ____ Odor surfactant available ____ Odor(s) observed ____ Odor(s) within incoming loads ____ Odor complaint(s) lodged by abutters ____ Location of odor recorded ____ Corrective action needed Remedy_____
Dust/Litter ____ signs of dust or litter ____ dust/litter emanating from tipping area ____ dust/litter migrating off-site ____ dust control(s) misting/hose being used ____ dust control(s) effective ____ need to apply additional dust control(s) Location:_____ Remedy_____	**Noise** ____ unacceptable noise levels present at site boundaries ____ noise complaints lodged by abutters ____ Sound Attenuation controls needed Locations:_____ Remedy_____
Security ____ Fences and gates intact ____ Roll doors to building able to close ____ Gates locked when not in use ____ Signs posted ____ Corrective action necessary	**Fire** ____ Smoke observed ____ Fire observed ____ Corrective action necessary ____ Area where smoke observed recorded ____ Area where fire observed recorded ____ Fire Department needed

Comments:_____
_____
_____
_____

Devens Recycling - Routine Site Monitoring

X = Satisfactory	**Y = Yes**
NA = Not Applicable	**N = No**
O = Repair or Adjustment Required	
C = See Comments section	

Stored C&D ____ containers covered ____ material migration ____ placed on paved surfaces ____ off-site migration ____ corrective action needed	**Equipment** ____ evidence of leaks ____ equipment in need of repair ____ Corrective action needed
Access Roads ____ signs of deterioration ____ debris present ____ in need of repair ____ need to apply dust control(s) Area _____	**Non Acceptable Waste(s)** ____ loads rejected ____ waste handled accordingly ____ corrective action necessary ____ Other:
Tipping floor ____ signs of cracking ____ signs of erosion ____ volumes stored acceptable ____ materials stored acceptable ____ corrective action necessary	**Stormwater** ____ Catch basins ____ Oil Water Separator(s) ____ Detention Basin ____ Pavement

Comments:_____
_____
_____
_____
_____