FACILITY MANAGEMENT PLAN

(Last Revised November 2024)

This Facility Management Plan provides information for site staff to become familiar with and to properly manage the NEWSVT (New England Waste Services of Vermont, Inc.) lined landfill facility located at 21 Landfill Lane in Coventry, Vermont. The facility is owned and operated by NEWSVT whose parent company is Casella Waste Systems, Inc. located at 25 Greens Hill Lane, Rutland, Vermont, 05701.

1.0 FACILITY IDENTIFICATION, SERVICE AREA, AND ANTICIPATED SITE LIFE

The NEWSVT lined landfill is located at 21 Landfill Lane in the Town of Coventry, Vermont.

The Facility mailing address is:

New England Waste Services of Vermont, Inc.

P.O. Box 348

Newport, VT 05855

Phone: (802) 334-8300 – Fax: (802) 334-2476

The Facility physical address is:

New England Waste Services of Vermont, Inc.

21 Landfill Lane

Coventry, VT 05825

The current disposal Facility is designed and constructed in accordance with the Vermont Agency of Natural Resources, Solid Waste Management Division Rules (eff; March 15, 2012). The Facility operates in accordance with the Solid Waste Management Facility's 10-year Certification (#OL510) that expires June 30, 2028.

2.0 ACCEPTABLE & UNACCEPTABLE WASTE TYPES

2.1 ACCEPTABLE MATERIALS AND ANTICIPATED TONNAGE

Recyclable materials and solid wastes which may be accepted at the facility (*landfill or the residential recycling drop-off station)* may include:

- Solid Waste for disposal – Municipal solid waste generated by residents. Non-hazardous, solid waste from commercial, mining, agricultural or industrial sources;

- Zero Sort® recycling at drop off - Includes #1-7 plastics, cardboard, boxboard, paper, newspaper, magazines, paper bags, paperback books, glass bottles & jars all colors, aluminum cans, metal cans, empty aerosol cans;

- White goods at drop off or removed from waste stream - Includes discarded stoves, washers, dryers, refrigerators, microwave ovens, dishwashers. White good appliances are prohibited from disposal in the landfill;

- Scrap Metal at drop off or removed from the waste stream – Discarded metal objects;

- Tires at drop off or removed from the waste stream;

- Asbestos - Handling requirements for Asbestos waste are outlined in Exhibit A;

- Wastewater treatment plant sludge may be accepted for disposal – Must be non-hazardous and consist of at least 12 percent solids and pass the Paint Filter Test (Paint Filter Tests are not required for sludge with percent solids of greater than 20 percent);

- Special solid wastes from outside Vermont which are not hazardous and have been approved by NEWSVT and the Solid Waste Management Division may be accepted. Special solid wastes from inside Vermont which are not hazardous and have been approved by NEWSVT may also be accepted;

- Regulated Medical Waste for disposal - That has received a "Certification of Treatment". The "Certification of Treatment" shall accompany the load and the load shall be placed and covered immediately in the landfill;

- Residual waste material from recycling center that has no recyclable value due to contamination or incompatibility with the recycling process (this excludes source separated, marketable and un-contaminated recyclables), and as approved by the Secretary;

- Leachate treatment residuals; and

- Organic Waste materials at drop off.

These wastes may be accepted at a rate not to exceed 5,000 tons per day. The waste is also restricted to an annual acceptance of 250,000 tons per year, however, with an approved administrative amendment to the operating certification the facility could accept up to 600,000 tons per year.

2.2 UNACCEPTABLE WASTES

Unacceptable wastes include but are not limited to the following:

- Those wastes prohibited by local, state and federal law;

- VTANR Non-Implemented Waste;

- Hazardous wastes (as defined by the federal and Vermont Hazardous Waste Rules);

- Regulated (untreated) Medical Waste unless specifically approved by the SWMP;

- Landfill Banned Items consistent with 10 V.S.A. 6621a including:
  - ✓ Clean Recyclables (Plastic #1 & #2, glass bottles and jars, aluminum & steel cans, aluminum foil, cardboard, mixed paper, newspaper)
  - ✓ Lead Acid & Rechargeable Batteries
  - ✓ Waste Oil & Filter
  - ✓ White Goods (Appliances)
  - ✓ Tires
  - ✓ Paints (Water and Oil Base), Paint Thinner, Paint remover, Stains and Varnishes – Note: Water based paint solidified in a container one gallon or less is acceptable for disposal)
  - ✓ Mercury-added consumer products
  - ✓ Electronic Wastes
  - ✓ Leaf & Yard Debris
  - ✓ Food scraps will be phased out in accordance with Act 148

- Liquid wastes (that is waste containing free liquids as defined by Method 9095 (Paint Filter Liquids Test as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" [EPA Pub. No. SW-846]);

- Contained gaseous wastes;

- Non-approved special wastes;

- Source separated marketable recyclables;

- Waste containerized liquids (with the exception of household soda, beer, coffee, etc); and

- Empty liquid waste containers greater than 30 gallons unless they are cleaned prior to disposal.

As indicated above, regulated hazardous waste will not be accepted at the facility. NEWSVT hosts the required amount of household hazardous waste and Conditionally Exempt Small Quantity Generator drop-off days for area towns and area businesses, respectively.

3.0 ROUTINE OPERATIONS

3.1 HOURS OF OPERATION

The Facility may accept waste (Gate Hours) for disposal from 6:00 a.m. to 5:00 p.m. Monday through Friday, 6:30 a.m. to 4:00 p.m. on Saturday. The facility may be closed on Sundays and holidays. The facility may modify the gate days/hours of operation at its discretion as long as it is within the days and times referenced above.

Routine landfill operational tasks such as inspections, meetings, maintenance, repairs, monitoring, sampling, and the application of daily cover may be conducted as needed.

During special events, the facility operating hours may be unlimited with prior written approval from the Vermont Agency of Natural Resources.

3.2 ACCESS CONTROL

Access to the facility is restricted by gates located along any access on Airport Road. Natural barriers preclude access along the south, west and north sides of the property. A sign or signs are posted at the scale entrance area indicating:

1. The facility name;
2. The name, address, and telephone number of the permittee;
3. The hours of operation; and
4. A list of Prohibited wastes.

The main entrance gate will be closed after the posted gate hours. An automated gate allows vehicles from inside the facility to exit the facility beyond gate hours.

3.3 TRAFFIC PATTERNS

Once into the site, waste hauling vehicles proceed along the landfill roadways until they arrive at the entrance point to the actual disposal area of the landfill.

As development proceeds, signs may be placed along the access road to indicate where hauling vehicles should travel.

Trucks entering the site in the early a.m. hours and prior to the landfill officially being open for the day may enter the facility and park where they will wait for the facility to open. Scale attendants either in direct discussions with haulers or through two-way radios will communicate with the drivers.

3.4 METHOD FOR TRACKING WASTE QUANTITIES (SCALE TICKETS)

All waste hauling vehicles entering the site are weighed on a certified scale. All drivers are required to sign a statement indicating that no hazardous wastes are present on their truck. Empty waste hauling vehicles check out at the scale house prior to exiting the site and a scale receipt may be given to the driver.

Scale tickets for all loads delivered to the site include: town of origin, state of origin, name of hauler, quantity, and type of waste delivery. Scale tickets will be maintained on site for five years.

3.5 MBI TARE WEIGHT MANAGEMENT, HAULING AND TIPPING OPERATIONS

Each MBI tractor and trailer units will be weighed when empty 10 times annually. An average of these weights will be used for a tare (empty) weight for determining the net weight of solid waste on each trailer. A report will be filed with the Agency by September 30 annually and will reflect each tractor and trailers combined weight, the resulting average will be used from October 1 through September 30 the following year.

MBI hauling vehicles require special handling at the landfill because the body of the truck has no mechanism to eject the load. To unload, the trailers are tipped off of a hydraulic platform. Once onto the landfill site, MBI vehicles proceed to the de-tarping station. Once the tarp is removed, the truck will then proceed to the working face area to unload. MBI vehicles then back onto the primary tipper and the waste is tipped. After unloading, the MBI vehicles will exit the facility utilizing the predetermined tare weight. A secondary tipper is on standby at the site if the primary tipper malfunctions.

3.6 PHASED DEVELOPMENT

One of the main objectives of the design and development of the disposal facility is to maximize the landfill capacity in the allowable footprint while conforming to regulatory and economic requirements.

Once permitted, the factors on where, how, and the size of the landfill cells that are constructed include: capacity needs, development cost, and construction timeframe.

Cells are typically constructed in 5 to 15 acre segments for a facility of this size at pre-settlement grades of 2.7 horizontal: 1 vertical.

As the landfill fills to pre-settlement grade and landfilling will not occur in those areas over consecutives years, one of two things occur:

(1) Final Capping ~ The final cap is installed and vegetative cover is established or the closure turf is placed and landfilling in those areas cease. The schedule of final cap is predicated on the annual volume of waste acceptance and submitted annually to the Waste Management and Prevention Division as required in the current Solid Waste Certification.
(2) Low Emission "Interim" Capping ~ To utilize capacity reestablished by waste settlement, exposed geosynthetic caps may be installed as an interim condition in areas that have been filled to at or near final grade. When the desired settlement is achieved, the interim cap may be removed so that active landfilling operations can reoccur in the cell. This process may be repeated until the rate of settlement no longer justifies the

reinstallation of an interim cap as determined by the airspace volume and consolidation evaluation further described below.

NEWSVT will review the degree of landfill settlement with the Waste Management Division once annually after a survey of the landfill is completed.

The temporarily capped areas will be visually evaluated for performance during the annual facility inspections required by the Solid Waste Certification, and will also be evaluated during routine surface emissions monitoring, which occurs on a quarterly basis.

3.7 STORMWATER MANAGEMENT

Stormwater management practices will be conducted in accordance with the facility's Multi-Sector General Stormwater Permit, Construction General Permit and the Stormwater Discharge Permit.

Temporary rain covers (tarps, synthetic membranes, etc.) used to divert clean run-off from within the lined area may be utilized when appropriate. Any stormwater run-off diverted beyond the lined footprint of the landfill will be managed by the existing stormwater management system around the landfill (detention ponds, rip-rap swales, stone check dams, grass lined swales, etc.).

3.8 FILLING PROCEDURES

The filling procedures described below will be typically followed during disposal of solid waste. Special handling procedures may be necessary during the disposal of certain special wastes.

INITIAL LIFTS OVER THE LINER - To limit the potential for damage to the liner system by landfill equipment or bulky wastes an initial **five-foot lift** of select refuse will be placed over the sand drainage layer. Select refuse is bagged trash or trash that has been pre-sorted with an excavator and is free from large objects that could be driven through the sand and damage the underlying liner system. Additional care will be taken during the initial five-foot lift placement to remove items from the waste stream that could be pushed through the sand and into the liner system and a spotter will be present during placement of the initial five-foot lift and will remove any unacceptable items. The second lift of refuse above the fluff lift will be kept back a minimum of five feet from the top outer edge of the fluff lift so inspection can confirm that potentially damaging objects have been removed.

TYPICAL LIFTS - Following placement of the initial lift, fill placement will proceed in successive compacted layers. It is noted that actual day-to-day operations are left to the discretion of the Site or General Manager.

3.9 DAILY, INTERMEDIATE COVER & ROAD BASE MATERIALS

Daily cover consisting of six inches of soil or an approved ADC (alternate daily cover) material will be applied to the working face at the conclusion of each working day. ADC may consist of

geotextile, tarps, or spray-on foams and have been used successfully at landfill sites throughout the country. ADC will be used only after gaining approval from the SWMP.

Twelve inches of intermediate cover soil will be applied in areas where active filling will not occur for a period of twelve months or more. Intermediate cover soil will be seeded and mulched as soon as practical.

Ground, chipped and crushed wood, processed glass and discarded asphalt, brick and concrete can be used as beneficial use road bed material at this facility. Processing of any of the discarded material shall take place within the landfill footprint and not on areas that have received the final landfill cap. A copy of the current ADC & BUD (beneficial use determination) materials can be found in Exhibit B.

3.10 WINTER OPERATIONS

Snow will be plowed using conventional plowing methods. Roadways will be sanded or salted accordingly to make access safe. The landfill management reserves the right to close the landfill in severe weather elements.

3.11 PERSONNEL AND EQUIPMENT

The following table will be used as a guideline:	Operations at 1,500 tons per day (avg.)	Operations at 2,500 tons per day (avg.)	Operations at 3,500 tons per day (avg.)	Operations at 5,000 tons per day (avg.)
On Site Staffing				
General Manager	1	1	1	1
Operations Supervisor	1	1	1	1
Environmental Technician	1	1	1	1
Mechanic	1	1	2	3
Heavy Equipment Operator	5	6	7	8
Scale Operator	1	1	2	2
Laborer	1	1	2	3
On Site Equipment				
Front-end Loader	1	1	1	2
Articulated Pay Hauler	2	3	3	4
Waste Compactor	2	2	3	4
Excavator	2	2	2	2
Dozer	3	3	3	4
Site Truck (1 Ton)	1	1	2	2
Water Truck	1	1	1	1
Bobcat	1	1	1	1
Fuel Truck	1	1	1	1

Note: Each number represented in the "On Site Staffing" section reflects the number of personnel that would be on site each operating day; unless otherwise noted. The "On Site Equipment" section represents the amount of equipment expected to be necessary to manage the respective tonnage each day.

NEWSVT will provide training to employees that is necessary to educate the person to properly perform the duties of his/her position. At least one person on site will have OSHA 40-hour Hazardous Waste Operations and Emergency Response training. Equipment maintenance, or replacement is a common occurrence and back up equipment is always available if necessary. Routine equipment maintenance will be performed as necessary to keep the equipment in good operating condition.

3.12 ACCIDENT PREVENTION AND SAFETY

NEWSVT has a safety and accident prevention program. As part of this program, employees will be trained in proper operating and emergency procedures. Telephone and radio communication and first aid equipment is provided at on-site facilities as well as on-site equipment. Regular safety meetings will be held at the facility.

3.13 BIRD CONTROL

NEWSVT contracts with the United States Department of Agriculture (USDA) to reduce the bird population at and around the facility. Please refer to Exhibit C for a copy of the Bird Management Plan. Four to five days a week (or as necessary) a member of the USDA is on site and performs dispersal techniques such as shot crackers and whistlers (bottle-rockets), depredation, inflatable predators. NEWSVT staff performs the above referenced techniques when and if the USDA is not on site.

3.14 ODOR CONTROL

NEWSVT is committed to mitigating odor and will take measures to identify potential sources of odors and corrective measures to reduce the intensity and frequency of odors transported detected offsite by residential locations. The facility as well as incoming loads of waste have the potential to generate odors. It is the facility's responsibility to try and reduce the potential for odor.

Odor Sources

There are three primary potential odor causing elements at the facility, they are;

1) Waste Related Odors, including:
   a) Municipal Solid Waste Odor (daily working area and inbound vehicles),
   b) Sludge Odor (daily working area and inbound vehicles);
2) Landfill Gas Odor (Less than 2% of landfill gas generates odor, these are primarily organic compounds in the gas (non-methane) that have sulfides and sulfur that have odor; and
3) Leachate Odor (during pumping activities or atmospheric exposure).

Odor Mitigation

The above sources of landfill-related odors will be managed to the extent possible to prevent offsite migration of odor. The following are protocols specifically tailored to target each potential odor source:

Waste Related Odors

A variety of methods are utilized to control waste related odors, including;

A. The active placement of incoming wastes is confined to the smallest cell area possible. The wastes are placed in the active face, compacted, then another lift initiated;
B. If a load of waste arrives that is noticeably odorous, ash, non-odorous waste or soil can be utilized to cover the waste to limit odor migration;
C. Additionally, proper daily cover is applied over the active portion of the landfill at the end of each workday;
D. When necessary, odor neutralizers and deodorizers can be utilized to control odors from arriving and offloading wastes;
E. Deployment of an odor neutralizing or masking system applied in areas in the landfill where odors are noted; and
F. If waste streams are identified which routinely exhibit unacceptable odor, the generator will be asked to take measures to reduce odor. If this cannot be accomplished, the generator's waste stream may not be accepted at the facility (discussed further below).

Landfill Gas Related Odors

A variety of methods are utilized to control landfill gas related odors including;

A. A comprehensive landfill gas collection and control system, including gas blowers/flare systems, horizontal collection trenches, and vertical extraction wells, has been designed, approved, and installed at the facility;
B. Interim Cover System- Installation of interim geosynthetic or soil capping/cover once waste reaches final grade;
C. Final Cover System - Installation of final capping system pursuant to the approved final cap design; and
D. Deployment of an odor neutralizing or masking system applied in areas in the

landfill where odors are noted.

Leachate Related Odors

Two primary methods are utilized to control leachate related odors:

A. Limiting atmospheric exposure during pumping and maintenance activities; and
B. Proper contained storage onsite and proper transportation utilizing sealed tankers.

Procedures related to evaluating sources of odorous wastes

If certain wastes accepted at the landfill are consistently observed as having nuisance odors the following will occur:

A. The customer will be asked to take measures to control nuisance conditions, if within one month of written notification of the nuisance condition, and nuisance conditions have not improved; and/or,
B. NEWSVT will request a site visit to the customer's location to determine if recommendations can be provided to mitigate nuisance conditions. If nuisance conditions cannot be mitigated and/or recommendations are not successful; and/or,
C. The customer will be given a 30 day notice and acceptance of the waste material will be suspended until nuisance conditions can be remedied.

Procedures for Troubleshooting Landfill Gas Related Odors

Ineffective gas collection could be a source of landfill gas migrating beyond the property line, the following mechanisms are in place or could be implemented if off site landfill gas is continuously detected:

A. Inspection of existing infrastructure to assure proper function and operation;
B. Installation of new gas collection devices (new horizontal gas collectors, new vertical gas wells, connection to leachate cleanout pipes);
C. Gas Well Dewatering, NEWSVT generally considers the following scenarios as triggers for initiating landfill gas well dewatering, replacement of gas collection and control system (GCCS) components, and expansion of the GCCS:

    On a quarterly basis, NEWSVT performs surface emissions monitoring (SEM) in accordance with the New Source Performance Standards (NSPS) to verify control of landfill gases by the GCCS. If SEM results are found to equal or exceed the NSPS threshold of 500 parts per million three times within a quarterly period, NEWSVT may choose to dewater landfill gas wells located within the vicinity of the exceedance as an alternative remedy to installing a new well or collection device. As required by NSPS, NEWSVT will submit a request for approval to the Vermont Air Quality and Climate Division when dewatering is proposed as an alternative remedy to address a NSPS exceedance.

Replacement of Gas Collection System Components

NEWSVT will replace horizontal gas collectors, gas wells, gas headers, and other GCCS components when they water out, break, or no longer efficiently extract or convey gas.

Expansion of Gas Collection System Components

LFG is actively collected by a GCCS comprised of horizontal collectors, vertical wells drilled into the landfill, and leachate piping cleanouts. NEWSVT manages the GCCS in accordance with the NSPS. The GCCS is expanded with the construction of new cells, when final grades are met, and prior to the installation of temporary or final capping systems. Other triggers for expanding the gas collection system are to address SEM exceedances when they are encountered, when cover integrity has been compromised, and/or when LFG odor is present on-site.

Odor Complaint Procedures

The basic facility procedure for responding to odor complaints is as follows:

A. When odor complaints are received, site personnel will ask several specific questions of the caller including requesting identification and the nature of nuisance condition as detailed on the Nuisance Complaint form (below);
B. The information will be documented by the person receiving the call, then relayed immediately to the proper landfill staff person who will respond to the complaint;
C. The designated staff member chosen will be responsible for following up with each caller, more thoroughly documenting the complaint, and for notifying other staff, if any corrective action(s) may be required; and
D. Once the nuisance form is complete, the VTANR WM&PD will be provided a copy of the form.

In addition to the facility protocol for responding to odor complaints, a third-party odor investigation contractor has been contracted, per the requirements of Act 250 7R0841-13 dated July 23, 2019. The third-party contractor utilizes an odor-complaint form and notifies the agencies required under Act 250 conditions.

COMPLAINT RECORD FORM - NEWSVT LANDFILL

-THIS SECTION COMPLETED BY NEWSVT PERSONNEL MANAGING COMPLAINT-

Complaint Log:

Complaint received by the following method:

☐Odor Hotline ☐Landfill Office Phone ☐Email ☐VTDEC ☐Text ☐In Person ☐Other: _____

Date: _____ Time: _____☐AM☐PM

NEWSVT Manager Contacted Regarding this Complaint:

☐Patricia Geoffrey ☐Shane Wiggett ☐Jeremy Labbe☐Sam Wiggett ☐Joe Gay☐Other NEWSVT Personnel: _____

Date/Time Manager Received Reported Complaint: Date:_____ Time:_____☐AM☐PM

Complaint Log Number: _____

Complaint Information:

Name of Person Filing Complaint: _____

Address: _____

Telephone number: _____

Nature of complaint: ☐Odor ☐Noise ☐Light ☐Dust ☐Traffic☐Other

For Traffic Complaints - Name of Company:_____ License#:_____ Road/Route:_____

Direction traveling_____ Truck type ☐tractor trailer ☐straight/dump trailer

For Odor Complaints; Time odor was detected:_____☐AM ☐PM

For Odor Complaints; Duration odor was detected:_____☐AM ☐PM

For Odor Complaints; Complainant's Description of Odor Type:

Note: This should be description of the odor in their own words (i.e. fishy, chemical/solvent, septic, putrid etc.) Avoid them identifying outright as gas, sludge, leachate or garbage unless their description specifically suggests that.

For Odor Complaints; Complainants Description of Intensity & Presence:

Note: do not use numeric scale; description should be: Very Faint, Faint, Distinct/easily noticeable, Strong, Very strong and a presence as fleeting, intermittent to consistent

Is the odor being detected at the caller's residence? ☐Yes ☐ No

Additional Description of the Event by Complainant:

Return call requested?☐Yes ☐ No, Site visit requested?☐Yes ☐ No, Property Access Granted? ☐Yes ☐ No

Weather Data at Time of Complaint:

Source of Weather Data: _____

Weather Description: Temperature: _____°F. Bar. Press.(in-Hg):_____ Precipitation: _____

Wind direction & speed: From the _____ @ _____mph.

General conditions: (Sunny, Cloudy, Fog etc.) _____

Person Filling This Form: _____

-THIS SECTION COMPLETED BY RESPONSE PERSONNEL-

Name of Responder(s): Telephone Follow Up: _____ Site Visit:_____

Return Telephone Call Completed? ☐YES☐NO Date:_____ Time: _____☐AM☐PM

Contact Made?☐YES☐NO Date:_____ Time: _____☐AM☐PM

Summary of Telephone Call:

Site Response Completed?☐YES☐NO Date:_____ Time: _____☐AM☐PM

Contact Made?☐YES☐NO _____ Name of Complainant/Contactee:_____

Summary of Visit & Communication:

Odor Responder Observations:

Was an Odor Detected;☐YES☐NO Time: _____ ☐AM☐PM

Responder's Description of Odor Intensity using N-Butanol Scale:☐NONE ☐1 ☐2 ☐3 ☐4 ☐5 ☐6 ☐7-8

0 = No Detectable Odor
1 = Very Faint **Note: ½ scale units can be used) i.e. 0.5, 2.5 etc.)**
2-3 = Faint
3-4 = Distinct, easily noticeable
5-6 = Consistently Detectable Strong Distinguishable Odor
7-8 = Very Strong

Responder's Description of Odor Character:

☐Garbage/Rotten ☐Sludge/Septic ☐Landfill Gas/Rotten Eggs ☐Leachate ☐Barnyard/Manure ☐Chemical/Solvent

☐Wood Smoke ☐Other:_____

Responder's Description of how Persistent the Odor is:

Infrequent puffs of detectable odor ☐ (**seconds** of detectable odor followed by minutes of no odor detected)

More frequent puffs of detectable odor ☐ (**minutes** of detectable odor followed by minutes of no odor detected)

A steady, consistent odor ☐_____

Additional Description:

(together with wind direction, character should be as descriptive as possible trying to identify odor SOURCE)

Weather Observations at Time of Response at the Odor Complaint Location:

Weather Description: Temperature: _____°F. Precipitation: _____

Wind direction & speed: From the _____ @ _____mph.

General conditions: (Sunny, Cloudy, Fog etc.) _____

Weather Data at Time of Response From Landfill's Weather Station

Weather Description: Temperature: _____°F. Bar. Press.(in-Hg):_____ Precipitation: _____

Wind direction & speed: From the _____ @ _____mph.

General conditions: (Sunny, Cloudy, Fog etc.) _____

Other Responder Comments Pertaining to Response:

Completed Complaint Record Form entered in Environmental Database: ☐YES☐NO Date: _____

3.15 DUST CONTROL

Dust control procedures will include proper maintenance of vegetated areas, gravel and paved service roads. This maintenance will include reseeding areas where lack of vegetating is causing dust.

Dust will be controlled on the access road by the application of water and/or calcium chloride. Road sweeping may also be performed to reduce fugitive dust. Dust control is required to minimize off site nuisance.

3.16 WIND-BLOWN LITTER

Blowing litter will be by limiting the active working face and using daily cover over the active fill areas. Litter fence has been installed in areas where necessary. Other methods, such as the utilization of litter pickers and portable fencing, will be employed as required to contain loose paper and other wind-blown litter during the fill operations.

At the discretion of the landfill management, the landfill may close on days with extremely high winds. In those cases, the SWMP would be notified.

The facility currently collects litter along both sides of Airport Road from the Laramee Road to the intersection of Airport Road and Route 5. For safety reasons, litter collection will occur as weather conditions allow.

All refuse hauling trucks are required to have their loads securely tarped or use closed containers/truck bodies. The site manager will be responsible to assure litter control efforts are sufficient.

3.17 VECTOR CONTROL

Mammals or insects carrying potential pathogens from within the landfill to a place outside the landfill (Vectors) are controlled by the use approved daily covers to minimize or eliminate such concern.

If at any time any mammal or insect is determined to be carrying potential pathogens from within the landfill to a place outside the landfill, control techniques will be employed. This could be the installation of fencing, scare tactics, enclosed bait stations in the case of mammals and the services of a professional exterminator in the case of insects.
The USDA also assists the site with vector control techniques.

4.0 WASTE INSPECTION

Waste Inspection is intended to ensure that to the extent practicable only acceptable wastes are disposed at this facility.

Random load inspections will occur on a weekly basis to monitor for unauthorized waste (see Exhibit D for the Random Load Inspection Report form). In addition, compactor operators routinely visually observe the waste as the vehicles discharge their load onto the working face. As refuse is spread at the working face, operators observe for unacceptable materials.

Once vehicles are in the disposal area a waste hauler is selected at random and is generally directed to the edge of the current disposal area. The waste is off loaded and observed by the inspector as it is in the unloading process and again after it has completely emptied from the truck body. The inspectors shall not handle any waste and shall observe the contents and complete the random load inspection form. The procedure outlined below shall be followed if a prohibited waste is found in the load.

When a potentially dangerous unidentified waste is discovered, the procedure outlined below will be followed:

1. A potentially dangerous unidentified waste which is deposited on the working face and which does not appear to be an immediate threat to health or safety will be isolated. The customer will be identified, and the customer will be asked to remove the waste. If a customer or hauler cannot be identified, NEWSVT personnel will collect the items and place them in the on-site connex box either in a 55 gallon labeled drum or within a storage bin. Once or twice annually, the collected items will either be taken by Clean Harbors at one of the household hazardous waste collection events or removed by Safety Kleen.

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), it will be left in place undisturbed. The State of Vermont "Hazardous Substance Spill" or "Emergency Management Office" will be contacted at ***(802) 828-1138*** and ***1-(802)-244-8721*** respectively.

5.0 LEACHATE MANAGEMENT

The leachate collection systems consist of double liner systems with primary leachate and secondary detection collection systems. The leachate collection pumping and handling systems were designed so that head buildup over the liner floor is less than one foot under routine operating conditions. In the event of rainfall generated from a twenty-five year, twenty four hour storm event, the facility has up to 5 days to restore the level to one foot or less.

5.1 PUMPING/REMOVAL SCHEDULE

Primary Leachate and Secondary detection liquid will be automatically pumped from collection sumps. The primary pump controls will activate the pump when leachate has reached a level

approximately corresponding to the primary HDPE base liner elevation adjacent to the sump or less. Liquid will be pumped from the secondary collection sumps when the liquid level is at an elevation corresponding to the secondary liner grade adjacent to the sump. Primary leachate and secondary detection liquids will be pumped directly from the sumps up riser pipes through a HDPE force main to the side slope riser buildings. Primary leachate and secondary detection liquids are metered and can be sampled in these buildings that also serve as a point for pump access and replacement. The leachate then continues out of the building through dual contained HDPE pipes to double-walled storage tanks.

In the event that storage tanks are full, the controls will automatically shut off the pumps and an alarm indication is sent to the landfill directly to landfill staff. In addition, notification is sent to an answering service after normal hours. The answering service has a list of contacts to call so that someone will respond to address the situation at the site. Leachate is then hauled to the Montpelier, Vermont WWTF or an out of state wastewater treatment facility.

5.2 UNDER GROUND LEACHATE STORAGE TANKS (UST'S)

Any underground double walled leachate storage tanks will be tested on a monthly basis. The tanks will be tested by dropping a dipstick into the tank interstitial monitor portal or by monitoring a vacuum pressure gauge to confirm that the interstitial space is dry (see Exhibit E for a copy of the inspection form). The table below illustrates the number of USTs at the site:

UST Tank Size	Date Installed	Location	Date of Interstitial Inspection
20,000	Fall 2022	West of the Phase III Cell 2 side slope riser building	Due during the Year 2032

If a tank is inspected and liquid is detected within the monitoring portal, a sample will be drawn and field tested for Temperature, pH, Specific Conductivity and for visual appearance. If it can be reasonably assumed from these measurements that the liquid is leachate then the leachate will be removed immediately to a tanker truck or adjacent storage tank. All pumps contributing leachate to the tank shall be shut off and a contractor shall be hired to inspect the inside of the tank as quickly as practical. Any repairs will be completed and a static water test will be performed before the tank is put back into use.

If a tank is inspected and liquid within the monitoring portal does not appear to resemble leachate and/or match the level within the tank then the liquid will be removed using a hand held suction/siphon device. The tank interstitial space will then be monitored daily; if the level does not rise a test applying 2 pounds per square inch of vacuum will be performed to confirm the integrity of the outer tank and will then be placed back into service if the test passes. If the vacuum test fails, the tank will be exposed or removed for repairs.

Any UST must be visually inspected every 10 years to check the condition of the coating material. If defective, repairs will be made.

5.3 ABOVE GROUND LEACHATE STORAGE TANKS (AST'S)

On-site ASTs (above ground leachate storage tanks) shall be inspected at least once monthly from the outside of the tank. If a leak is found, any tank volume would be reduced to below the leak level and the manufacturer would be called for immediate repairs. The site currently has one 438,000 gallon AST that was installed in 2005 and one 524,000 gallon AST that was installed in 2021 that provide leachate storage.

In order to prevent leachate being stored on the liner, the level of leachate inside the tank shall be kept at or below 67% of its capacity. If the level is above 67% for 3 consecutive days, the Vermont Agency of Natural Resources will be notified within 24 hours. The level will be reduced at or below the 67% storage capacity limit within three days of such notification. Leachate will be taken to one or more of the approved Wastewater Treatment Facilities listed in Section 5.1 of this document.

5.4 LEACHATE CONTINGENCY CONSIDERATIONS

If a leak occurred inside a side slope riser building, secondary containment is provided by a sealed concrete floor with a twelve inch curbing. A building flood switch is located inside the building and monitors the floor for accumulation of leachate which could result from a leak in a pipe; this switch would turn off all contributing pumps to the building. In most cases spare pumps and certain types of valves and fittings are available at the site for replacement. Otherwise, replacement parts are typically twenty four to forty eight hours from delivery.

In the event of an extended power outage an end-suction centrifugal pump may be used to remove the leachate off the primary liner systems. In each Phase, a generator can be utilized to provide interim power to operate the pumps.

Secondary Detection System 20 g/a/d Exceedance

The Secondary Detection Systems at this facility are measured each day for flow rates. The following table outlines the actions to be taken if rates reach certain levels within any individual cell:

g/a/d (Gallons per Acre per Day)	**ACTION**
0 – 20	Monitor Daily
20 – 100	Inspect the non-conforming cell for signs of stormwater infiltration, particularly around the perimeter of the cell, and develop a graphical representation of rainfall versus flow rates for the 30 days prior to the exceedance and until the rates fall to below action levels. Sample both the Primary and Secondary Systems for: Field (pH, Temperature and Specific Conductance); Laboratory Analysis for (COD, BOD, Total Sodium, Total Chloride and VOCs). Submit Report the SWMP summarizing the above referenced findings.
> 100	Notify the SWMP within 24 Hours. Perform all the tasks in the 20 - 100 g/a/d cell above. Submit a preliminary assessment within 14 days. If no reasonable explanation can be determined, present a Remedial Action Plan the SWMP for consideration within 30 days of the initial notification.

In the event a stormwater contingency event occurs that results in an increased generation of leachate at the Facility, NEWSVT has the capability to transport up to 15 loads of leachate, with each load consisting of approximately 8,000 gallons, from the facility for disposal daily.

5.5 ONSITE LEACHATE PRE-TREATMENT SYSTEM

On the west side of the facility and just south of the above ground storage tanks is the building that encloses the Leachate Pretreatment System (LTS). This system is specifically designed to pretreat leachate for per- and poly-fluoroalkyl substances (PFAS). The management of the LTS, leachate conveyance processes, and the management of residuals are described in the sections below.

5.5.1 LEACHATE PRE-TREATMENT BUILDING

The LTS is enclosed in a building that accommodates the piping, treatment system, and other infrastructure needed for the leachate treatment. The building is located to the southwest of the existing leachate loadout building and uses the site's leachate management system consisting of a leachate underground storage tank (UST), two leachate above ground storage tanks, valve building, and leachate loadout building and various leachate conveyance piping.

The LTS building is equipped with a floor drain connected via gravity drain to the UST using dual-walled pipe to contain leachate in the event there is a leachate release in the leachate treatment building. A leak detection switch is fastened to the floor drain and connected to the on-site supervisory control and data acquisition (SCADA) system which will notify NEWSVT in the event of leakage that exceeds floor drain capacity. It will shut off the LTS and the source of untreated leachate.

Drainage will be visually inspected during routine operations. Accumulated residuals will be manually removed from the drains as necessary and mixed into the concrete/solidification batching process. Drains will be flushed with fresh water while leachate cleaning activities occur to prevent buildup.

Leachate Conveyance

NEWSVT currently uses AST-1 for storage of untreated leachate and AST-2 for storage of leachate pretreated by the LTS. This may change as necessary based on tank cleaning and service. The piping and valve network within the leachate valve building is used to control where leachate is stored. Untreated leachate is pumped from AST-1 to the LTS in the leachate treatment building for treatment. Pretreated leachate is pumped from the leachate pre-treatment building through the leachate valve building and temporarily stored in AST-2. Pretreated leachate is then pumped from AST-2 to the loadout building where leachate tanker trucks transport it to wastewater treatment facilities.

The piping configuration also allows for untreated leachate to be conveyed directly from the UST to the leachate treatment system in the event AST-1 needs to be bypassed. The below ground leachate conveyance pipe is constructed with dual-walled pipe.

5.5.2 LTS RESIDUALS MANAGEMENT

NEWSVT staff operate and maintain the LTS, the leachate pre-treatment building, the additional leachate conveyance pipes required to operate the LTS, and disposal of treated residuals.

The process of treating leachate generates a concentrated PFAS liquid residual. Residual is stored in a 7,500-gallon storage tank inside the approved leachate pre-treatment building.

While the facility is operating, NEWSVT will dispose of PFAS concentrate in the active landfill after solidification or transport it to an approved disposal facility.

All operations related to the transfer and solidification of residuals will occur inside the leachate pre-treatment building, within containment.

Solidification

During the solidification process, concentrate will be pumped from the storage tank via enclosed hose and piping with transfer pump from the residuals tank directly to the concrete mixer. The mixer is automated with liquids injected directly into mixer, not handled, or added by personnel. Concentrate will be solidified within the building (within containment) utilizing concrete or other solidification products specific for PFAS sequestration in batches of 100-500 gallons. The steps in the solidification process are as follows:

- Hook up PFAS hose from tank to cement mixer;
- Turn on ventilation fan;
- Turn on cement mixer, make sure screw guard and shoot is in place;
- Add bags of cement (or other solidification material);
- Turn on PFAS water line;
- When complete, shut off PFAS water line and properly contain and store hoses pumps, and mixing equipment.

Solidified material will cure within the building (within containment) according to manufacturers specifications.

Solidified material is mixed within a tipping dumpster or similar container that is designed for dumping within the landfill. Once cured, material is directly transported by NEWSVT staff to the working face for disposal. Material is placed within a hole or area against a bank where it can be buried without being broken up by equipment and will remain in a solidified mass.

During the solidification process, active dust control will be in place for silica dust. Operators will not directly handle concentrate but will wear rubber gloves and other appropriate PPE, in accordance with company safety requirements, when solidifying material.

Transfer

All transfer of concentrate will occur inside the leachate pre-treatment building, within containment. Transfer from the residuals tank will occur with pumping equipment, enclosed hoses and piping and pumps to a liquid tanker truck or similar.

Spill response will occur in accordance with our SPCC plan. Safety procedures remain the same as the solidification process.

After the landfill closes, PFAS concentrate will be transported to an approved off-site disposal facility.

5.6 RECORD KEEPING AND MONITORING

The facility will maintain records for each load of leachate shipped, identifying the quantity of leachate shipped, the date shipped, and the name of the wastewater treatment facility receiving the leachate.

Facility permits, construction as-built drawings, scale records, inspection reports and this Facility Management Plan will be kept at the site. Some compliance functions and recordkeeping are managed off site.

6.0 RESIDENTIAL DROP-OFF

Areas will be designated on-site for collection of listed recyclables, scrap metal, white goods, waste oil, cardboard, food scrap and tires. Rechargeable & wet cell batteries will be stored in plastic tubs located under cover. NEWSVT will provide containers for listed recyclables, cardboard, food scrap, leaf & yard debris, mercury containing bulbs and solid waste. Items collected in the recycling containers will be trucked to a materials recycling facility. White goods (with certified CFC removal labels confirming that all CFC's have been removed from the unit) and scrap metals will be collected in a roll-off container. Whenever a container is full, it will be transported off-site for recycling. Tires will be placed onto the ground and moved into a tire trailer at least once weekly. Leaf, Yard and Woody waste along with food scrap will be accepted at the drop off and composted on site or transported to a permitted composting facility.

7.0 FACILITY MAINTENANCE, INSPECTION, AND MONITORING

Service roads will be graded or swept when necessary and maintained in a serviceable condition. The scales, scale house and office, and the maintenance building will be maintained as required.

A Weekly Inspection Checklist Form (see Exhibit F) will be completed once a week for the facility. For items that are identified as requiring attention, inspectors will complete the section available on the inspection form for comments and/or proposed action. All outstanding items will be resolved as soon as practicable.

Upon completion of the inspection, the landfill operations manager will review the report as necessary or as soon as practicable.

Any Solid Waste Certification non-compliant situation shall be reported by NEWSVT staff as follows:

> The operator shall submit a report to the Secretary within five (5) working days of the receipt of any information indicating non-compliance with any term or condition of certification or other operating authority; and
>
> Any discharge or emission from a facility which poses a threat to public health and safety, a threat to the environment or the creation of the nuisance must be reported within twenty-four (24) hours to the State of Vermont Department of Environmental Conservation, the local health officer, and the selectpersons of the affected municipalities. A written report shall be submitted to the parties to whom the event was reported within seven (7) days of the discharge or emission. The report shall identify the discharge or emission that occurred, the type, quantity, and quality of waste, and the actions taken to correct the problem.

8.0 UNDERDRAINS

There are five underdrain discharge location points. One each for Phases I, II, III, IV & VI, these underdrains are designed to allow free gravity flow discharge unless conditions detailed below in the Underdrain Contingency section are experienced. Each underdrain will be sampled within the first full business week of each month and each sample will be analyzed for Temperature, Specific Conductance, pH, and estimated flow volume. Each underdrain outlet may be cleaned annually.

8.1 UNDERDRAIN TREATMENT SYSTEM

A per- and poly-fluoroalkyl substances (PFAS) treatment system for the groundwater discharge from the Phase III underdrain is located to the east of Phase III Cell 1. This treatment system receives groundwater via gravity flow, treats the groundwater for PFAS using two polyethylene tanks filled with granular activated carbon connected in series, and discharges the treated groundwater to a drainage area below grade to the east of the treatment system enclosure. Sampling of the treatment system influent is performed every other month, mid-point monthly, and effluent locations every other month to monitor for PFAS. The treatment system media is replaced when PFAS is detected. Spent media is disposed of in the landfill. Detectable releases of PFAS above the groundwater enforcement standard will be addressed according to the most current version of the facility's Solid Waste Facility Certification. The SWMP shall be notified if there is a detectable release of PFAS.

Following closure at the landfill facility, post-closure monitoring of the treatment system will be performed at the approved frequency at the time of closure, but no less than twice per year. This monitoring will include sampling of the influent, mid-point and effluent locations as noted above. Treatment system media will be replaced as needed based on monitoring results. Spent media will be disposed of at a permitted disposal facility. Inspection of the treatment system's valves,

insulation, heat trace, sampling ports, and other system components will occur as part of the monitoring events. Items observed to be malfunctioning or damaged will be repaired in a timely manner to maintain the integrity and effectiveness of the treatment system. A report including a summary of the treatment system operations and maintenance needs will be submitted to the SWMP after each evaluation. Access to the property will be maintained via the main gate for post-closure monitoring.

8.2 UNDERDRAIN CONTINGENCY

Purpose: This contingency plan presents the steps that would be taken if the Vermont Water Quality Standards are exceeded at any of the underdrain discharge points at the NEWSVT landfill facility in Coventry, Vermont.

Monthly field measurements: During the first business week of each month, NEWSVT personnel measure four parameters (pH, electrical conductivity, temperature, and flow rate) and make visual observations at each underdrain discharge point.

Semi-Annual laboratory analyses: In accordance with the current solid waste facility certification, during May and October of each year, water samples are collected from each underdrain discharge point. Field measurements of pH, electrical conductivity and temperature are performed, and lab analyses are performed for numerous inorganic parameters and volatile organic parameters. These results are reported to ANR within 60 days of sampling but no later than August 15th or January 15th following the testing date.

Contingency Plan Triggers: The actions described below would begin if one or both of the following trigger values are exceeded in the monthly field parameter measurements, in any one of the four underdrain discharges:

1. Electrical conductivity: exceeds 2,000 micro-mhos.
2. pH: less than 6.0 standard pH units (s.u.), or greater than 9.5 s.u.

Actions to be taken if a trigger is met:

1. NEWSVT personnel will notify qualified water quality professionals as well as the Solid Waste Division of the ANR before the close of the same working day.
2. Within two working days, a qualified representative will collect a second round of field measurements with different field equipment, to check the initial measurements.
3. During the same time as the step above, the same qualified water quality professionals will measure the same field parameters at the surface water station down-gradient of the triggering underdrain (SW-7 or SW-8), and at the Black River upstream and downstream stations (SW-1 and SW-2).
4. In this same two-day time period, NEWSVT personnel will confirm the proper functioning of the leachate pumping mechanisms and review the generation rates of the secondary leachate collection systems.
5. By the end of the working day in which the second round of field measurements are taken, NEWSVT will report the results of Steps #2, #3 and #4 to the Solid Waste Division of ANR, and to the qualified water quality professionals.

Actions to be taken if the second round of field measurements confirms that a trigger has been met:

1. Before the end of the day in which notification is made in Step #5 above, NEWSVT will cap the discharge pipe and pump the groundwater from within the pipe to a double walled leachate holding tank or a leachate tanker. The discharge pipe will have a provision to allow a flange to be bolted onto the pipe and seal its discharge and have a provision to pump the liquid. This would divert its discharge from the Black River wetland complex to containment for eventual transportation to a wastewater treatment facility.
2. NEWSVT will continue with field measurements once a week, beginning one week after the second round of field measurements, until results have dropped below trigger values, or until resolution has been achieved. Measurements will be taken from the triggering underdrain, and in the surface water station down-gradient of the triggering underdrain (SW-7 or SW-8), and at the Black River upstream and downstream stations (SW-1 and SW-2). NEWSVT will report these field results to ANR and a qualified water quality professional by the end of the same day as the measurements.
3. A qualified water quality professional will collect samples from the triggering underdrain, from SW-7 or SW-8 (whichever is down-gradient), and from both Black River stations (SW-1 and SW-2), and will promptly deliver the samples to a qualified laboratory for the full suite of analyses that are listed for surface water locations in the current Solid Waste Certification. Laboratory results will be reported to ANR as soon as they are available.
4. NEWSVT will not allow the triggering underdrain to discharge to the ground surface or Black River wetland until permission is granted by ANR. If it is determined that the water quality of the underdrain discharge is not adequate to be conveyed to the Black River wetland complex, it will be transferred to the leachate collection system, stored in the leachate holding tanks, and ultimately transported to a permitted wastewater treatment facility.

9.0 LANDFILL GAS TO ENERGY FACILITY (LFGTE)

The facility includes a LFGTE facility that is owned by Coventry Clean Energy, a subsidiary of Washington Electric Cooperative which collects, treats and utilizes landfill gas as a fuel to power large internal combustion engines that in power generators that produce sufficient energy to support sustainable renewable energy to the electrical distribution system.

The facility actively extracts landfill gas from drilled wells, horizontal wells and hybrid vertical/horizontal wells, leachate cleanout pipes and sideriser sump piping in the landfill. These collection devices are continuously installed at the site when necessary.

The actual combustion devices in the control system are:

- A LFGTE facility with five Internal Combustion Caterpillar G3520C Series Engines with 1,600 kW generator units;
- A 75 million British thermal unit per hour (Btu/hr) John Zink Company, LLC utility flare; and
- A 77.8 million Btu/hr Parnel Biogas utility flare.

The electricity generated by the LFGTE facility is delivered to the Vermont Electric Power Company (VELCO) grid for distribution to utility customers.

Utility flares are intended for use when the landfill gas (LFG) collection rate exceeds the available engine combustion capacity or when the LFGTE facility is not operating. The control system is configured so that LFG can be combusted in the LFGTE facility, by the flares, or by both simultaneously.

9.1 GAS MONITORING AND CONTROL

NEWSVT or the LFGTE operators adjust the individual wellheads to optimize odor control, prevent gas migration, and optimize gas well production. The wells are also carefully monitored to prevent fires from occurring internally within the landfill. The well field is monitored as needed and generally at least once per month. Monitoring for fugitive landfill gas is conducted monthly at the landfill property line at gas probe locations around the perimeter of the limit of waste. A portable landfill gas meter is used to monitor for methane, oxygen, and hydrogen sulfide at these locations. If the concentration of explosive gas exceeds twenty five percent of the lower explosive limits in the landfill perimeter gas probes or facility structures at the time of measurement, the landfill operator will:

1. Immediately take steps necessary to protect human health and safety.
2. Within 24 hours of detection notify the Solid Waste Management Division (802-828-1138, 8:00 a.m. – 4:30 p.m., M-F), or the Hazardous Materials Emergency Hotline (1-800-641-5005), and in the instance of off-site migration, the affected property owner(s);

3. Within thirty (30) days of detection, submit a remedial action plan for the gas releases to the Agency for approval; and
4. Implement the approved plan in accordance with a compliance schedule established by the Agency.

A handheld explosive gas meter is used to check facility structures once a week.

10.0 GROUNDWATER MONITORING

Permanent groundwater monitoring wells have been installed to monitor groundwater quality at the site. Monitoring wells are provided with a protective casing and a locking cap.

Sampling and analyses of groundwater will be performed in accordance with the approved groundwater monitoring plan.

11.0 RECORD KEEPING

The following records will be kept at the facility:

- Facility Design Report and Plans (as submitted to the SWMP for Certification),
- Construction as-built drawings,
- This Facility Management Plan,
- Permit Binder,
- Active MBI Tare Weight log,
- Special Waste approvals,
- Asbestos receipts and a grid plan,
- Registered Nuisance Complaint Forms,
- Treated Regulated Medical Waste Certifications,
- A daily record will be maintained at the scale house of types of wastes received, weight and hauler identification, and
- Leachate loads are weighed and recorded for all outbound loads.

12.0 CONTINGENCIES & EMERGENCY PROCEDURES

12.1 SEVERE STORM

In the event of a severe storm, operations staff will evaluate and determine if early closure of the facility is warranted. The Agency will also be notified of any early closure.

12.2 FIRE PREVENTION

Fire protection controls on site consist of cover soils and fire extinguishers maintained in the equipment. The Newport Fire Department is located within three miles from the landfill and will be contacted in the event of a fire at the facility.

A representative from The City of Newport Fire Department conducts annual site visits.
Any hot load will be directed to a safe area of the landfill to be monitored.

12.3 POST EARTHQUAKE INSPECTIONS

Should an earthquake occur of sufficient magnitude to potentially cause damage to the leachate collection and storage system, a post earthquake inspection of the system will be performed.

The inspection will include confirming the integrity of the following:

1. The leachate pumps, controls, level indicators, alarms, and discharge piping;
2. The leachate pipe connections, particularly the pipe connections in the side riser building;
3. The leachate storage tank and its visible connections. The tank secondary containment system will be checked by a low pressure air test for underground tanks and by a visual inspection for above ground tanks;
4. The secondary detection system flows will be monitored every twelve hours for a three day period following the earthquake; and
5. Any cells with exposed liner will be visually inspected.

12.4 CONTINGENCY TRANSFER STATION

Should the landfill be closed prematurely and unexpectedly, a temporary transfer station will be constructed. The transfer station will consist of an area within the constructed landfill facility such that waste can be deposited and re-loaded into transfer trailers.