PROPOSED OPERATION AND MAINTENANCE PLAN G. MELLO DISPOSAL CORPORATION SOLID WASTE HANDLING FACILITY CARLETON DRIVE GEORGETOWN, MASSACHUSETTS 01833

Prepared For:

G. Mello Disposal Corp. 95 Tenney Street Georgetown, Massachusetts 01833

Prepared By:



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SECTION 1

INTRODUCTION

1.1 GENERAL

This Operation and Maintenance (O&M) Plan has been developed in accordance with 310 CMR 19.200, for the operation of the G. Mello Disposal Corporation (Mello) Solid Waste Handling Facility (Facility) located at Carleton Drive within the Town of Georgetown (Town), Massachusetts.

1.2 SITE DESCRIPTION

The project site is located in the southeastern portion of the Town. The site is depicted as Lot No. 46 on the Town of Georgetown Assessor's Map No. 15. The owner of record is the East West Realty Trust, 6 Norino Way, Georgetown, MA 01833. The site consists of a parcel of land totaling approximately 14.6 acres of land consisting of previously disturbed areas, by undeveloped woodland areas and wetlands. The site is generally bound northerly by residential properties, easterly by Interstate 95, westerly a commercial and industrial property and southerly by Carleton Drive. Figure No. 1, Locus Plan, presents the location of the Facility within the Town.

SECTION 2

OPERATION AND MAINTENANCE PLAN

2.1 310 CMR 19.205, HANDLING FACILITY DESIGN REQUIREMENTS

2.1.1 Stormwater Controls

(a) Performance Standard. Storm water controls shall prevent erosion, prevent the discharge of pollutants, protect the physical integrity of the handling facility, and be managed according to applicable standards established by the Department including, but not limited to, the wetlands protection regulations at 310 CMR 10.05(6)(b) and the Department's Storm Water Policy. For purposes of meeting the stormwater standards established by the Department, recharge shall be permitted at the handling facility only where the recharge will not adversely impact the quality of groundwater leaving the site. Peak rate attenuation shall be in accordance with that described in 310 CMR 19.205(1)(b): Design Standards, and source controls and pollution prevention measures (including design of the handling facility) shall be implemented to prevent discharge of pollutants. This standard applies to the construction and operational phases of the handling facility.

The Site currently contains no stormwater controls. An analysis of the Stormwater Management System will be completed and will outline upgrades and improvements to comply with the Massachusetts Stormwater Policy.

- (b) Design Standards. Storm water controls shall be designed to:
 - 1. prevent run-on or flow onto the waste or material handling or storage areas during the peak discharge from a 24 hour, 100-year storm;
 - 2. control the peak rate of run-off from the handling facility and paved areas of the Site resulting from a 24 hour, 25-year storm.
 - 3. control the peak rate of run-off from the handling facility resulting from a 24 hour, 100-year storm, to the extent practicable, if an evaluation of the peak rate of run-off resulting from a 24-hour, 100-year storm indicates there will be flooding up or downstream of the site using the most recent precipitation atlas approved for use by the United States National Weather Service, or their predecessor the U.S. Weather Bureau, shall be used to determine the rainfall depth associated with the 100-year storm (currently Technical Paper-40 published May, 1961).

Factual regulation.

2.1.2 Equipment

- (a) The operator shall provide equipment in adequate numbers and of appropriate type and size for the proper operation of the handling facility in accordance with good engineering practice and in compliance with 310 CMR 19.00. All compactor or other processing units shall be in duplicate with each unit capable of handling the expected design tons per day; except that only one compactor or processing unit may be satisfactory
 - 1. where the handling facility will handle under 150 tons per day, or
 - 2. where adequate facilities to continue operation and/or an alternate method to handle all incoming refuse in an approved and sanitary manner in the event of a failure or breakdown is provided.

Equipment used with the daily operation of the Facility will consist of two truck scales, one rubber-tired front-end loader and excavator equipped with a grappling claw. Mello owns additional equipment which is available for transport to the Facility for use in the daily operation, as necessary.

(b) The operator shall make provisions for the routine maintenance of equipment to assure satisfactory performance capability for the various operations of the handling facility.

The Facility will conduct necessary preventative maintenance and contracts with third parties for equipment repairs.

(c) The operator shall provide at the site suitable shelter or protection for all equipment and necessary service supplies used in connection with the handling facility.

Equipment used in the operation of the facility will be stored adjacent to the building at the end of each operating day.

(d) The operator shall make arrangements for providing standby equipment in the event of breakdown of regular equipment. Such standby equipment shall be available for use and shall be provided within 24 hours of breakdown; otherwise the handling facility shall be closed for receipt of wastes until equipment becomes available.

Refer to 2.1.2(a).

2.1.3 Weighing Facilities

The operator shall make provision on a continuous basis for the weighing or measuring of refuse delivered to the handling facility. Scales or other measuring devices may be required by the Department as follows:

- (a) The operator of existing or new handling facilities receiving 100 tons or more per day shall weigh all incoming solid waste.
- (b) Operators of handling facilities that receive less than 100 tons per day shall, on a daily basis, estimate the total weight and volume of waste delivered based upon the capacity of the vehicles which delivered solid waste to the facility.

Vehicles entering and exiting the site will be weighed at a truck weighing facility located along the access road. The weighing facility will consist of two truck scale and a modular scale house. The scale will be monitored by an attendant located within the scale house. The attendant will be responsible for recording the quantity of material entering and exiting the site. All vehicles entering and exiting the site will be weighed, with the exception of residents delivering bagged MSW, who have the option of disposing of MSW at a per bag fee. Containers containing bagged MSW will be weighed prior to discharge within the building at the end of each day. A daily log of tonnages accepted at the Facility will be maintained within the scale house.

2.2 <u>310 CMR 19.207, HANDLING FACILITY OPERATION AND MAINTENANCE</u> REQUIREMENTS

2.2.1 General

Operators shall incorporate procedures and practices, in accordance with approved plans and permit conditions, which will prevent pollution of groundwater, surface water and air quality and prevent dust, odors, noise and other nuisance conditions from developing.

This O&M Plan describes operating procedures and practices for the Facility in accordance with 310 CMR 19.207, Handling Facility Operation and Maintenance Requirements. Compliance with this O&M Plan and 310 CMR 19.207 will serve to prevent pollution of groundwater, surface water, and air quality, and prevent dust, odors, noise and other nuisance conditions from developing.

2.2.2 Supervision of Operation

(a) The operator of the handling facility shall be under the overall supervision and direction of an engineer or other person qualified and experienced in matters of solid waste handling and disposal.

The operation of the Facility will be under the overall supervision and direction of Mello. Mello is experienced in the operation of handling facilities having operated the Facility at 203 East Main Street Georgetown, MA since 1981. The daily operation of the proposed Facility will be under the direct supervision of Jason Mello, General Manager.

(b) The operator of the handling facility shall be knowledgeable of the requirements of 310 CMR 16.00 and 310 CMR 19.000 and of the general operating procedure and plans as prescribed by the design engineer.

A copy of 310 CMR 19.000, Solid Waste Management Facility, will be provided to the Director of Operations. The Facility will be in possession of the Authorization to Operate, Waste Ban Compliance Plan (WBCP) and O&M Plan prepared for the Facility.

(c) The operator shall be required to demonstrate familiarity and capability to operate equipment at the handling facility.

The staff will be familiar and licensed for the operation of equipment at the Facility and will be capable of operating the required equipment.

2.2.3 Access to Facilities

(a) The operator shall provide and maintain in good repair access roads at the facility. Such access roads shall be paved to minimize dust and designed and constructed so that traffic will flow smoothly and will not be interrupted by inclement weather.

Access to the site will be via a curb cut along Carleton Drive. A paved access road extends from Carleton Drive to the Facility. Vehicles delivering material to the Facility will proceed to the truck weighing facility located on the site. Signs posted at the entrance to the site will detail the hours of operation and list acceptable and unacceptable materials for receipt at the Facility. A locking gate is located at the entrance to the site along Carleton Drive controls access to the Facility.

(b) The operator shall limit access to the facility to such periods of time as an attendant is on duty and to those persons authorized to use the facility for the disposal of refuse.

Access to the Facility will be limited to the operating hours. A chain-link fence with locking gate along Carleton Drive and gate at the entrance to the Facility will control unauthorized access during periods the Facility is not operating.

2.2.4 Security

(a) The operator shall provide sufficient fences or other barriers to prevent access to the facility except at designated points of entry or exit.

A chain-link fence and locking gate at the entrance to the Site will minimize the opportunity for illegal access. A locking gate on the Facility access road will be open only during operating hours.

(b) A gate shall be provided at all access points and shall be locked at all times when the operator or his agent is not on site or during hours when the facility is not operating.

A locking gate at Carleton Drive and the Facility's access road will be closed and locked when the Facility is not operating.

2.2.5 Posting of the Handling Facility

The operator of a handling facility shall post signs at all access points to the facility which, at minimum, include the following information:

- (a) The name(s) of the owner and operator of the facility;
- (b) A 24-hour emergency telephone number for the facility;
- (c) The hours of operation;
- (d) A list of solid wastes banned or restricted pursuant to 310 CMR 19.017;
- (e) Other limitations and conditions of access to the facility; and,
- (f) Where established by the municipality, penalties for unauthorized use.

All required information listed above shall be posted on signs at the entrance to the Facility.

2.2.6 Unloading Refuse

The operator shall provide for continuous supervised unloading of refuse from incoming vehicles and shall post appropriate signs or other means to indicate clearly where incoming vehicles are to unload the refuse by direction of the attendant or equipment operator on duty.

The yard attendant located at the entrance to the building will be responsible for directing traffic entering and exiting the transfer station building, monitoring material discharged at the Facility, performing waste ban compliance and providing general upkeep of the site. All employees at the site will undergo yearly training in the identification of Massachusetts Department of Environmental Protection (MassDEP) waste ban materials. Should the attendant determine the load to contain unacceptable material, the load will be rejected and not allowed to discharge at the Facility.

In the event that an unacceptable or hazardous material is encountered at the Facility, Mello will contract with an area emergency response company to provide hazardous waste removal and clean up services.

Unacceptable or hazardous materials encountered will be segregated and isolated until such time that the response contractor removes the material from the Facility. Table No. 1 presents a summary of the operation of the handling facility.

TABLE No. 1: Summary of Handling Facility Operation

Permitted Daily Tonnage: 500 tons per day (tpd) average

550 tpd max

177,500 tons annually

Hours of Operation:

Handling Facility Monday – Friday, 6:00 a.m. – 5:00 p.m.

Saturday, 7:00 a.m. - 4:00 p.m. Sunday, 7:00 a.m. - 3:00 p.m.

Residents Monday – Thursday, 7:30 a.m. – 3:00 p.m.

Friday – Sunday, 7:30 a.m. – 12:00 p.m.

Waste Handled: Category 1 Construction and Demolition (C&D) Waste

Category 3 Bulky Waste

Municipal Solid Waste (MSW)

Waste Ban Materials

Equipment:

Receiving/Presorting 2 Truck Scales

1 Rubber-Tired Loader

1 Excavator equipped with Grappling Claw

Transfer Equipment 100 cubic yards (cy) Open Top Trailers

2.2.7 Special Wastes

No solid waste that has been classified as a special waste pursuant to 310 CMR 19.061(2): Special Waste, shall be received or handled at any handling facility unless the provisions of 310 CMR 19.061 are satisfied and the special waste is handled in accordance with any conditions specified by the Department in granting approval to handle the special waste and in accordance with the handling provisions of 310 CMR 19.061.

Special wastes will not be accepted at the Facility.

2.2.8 Banned or Restricted Solid Wastes

Solid wastes which have been banned or restricted from transfer or disposal pursuant to 310 CMR 19.017, Waste Bans, shall be managed at a handling facility in accordance with the approved facility plan prepared and approved in accordance with 310 CMR 19.017(5) unless an exception has been granted under 310 CMR 19.017(6).

Banned or restricted solid waste shall be handled in compliance with the Facility's WBCP. Signs posted at the Site will indicate waste ban materials not accepted by the Facility. Waste ban materials received will be transported to the recycling area and stored within the appropriate container. A copy of the Facility's WBCP is presented in Appendix B.

2.2.9 Hazardous Waste

(a) No operator shall handle any material subject to the Hazardous Waste Regulations, 310 CMR 30.000, at a solid waste handling facility permitted pursuant to M.G.L. c. 111, § 150A, except that waste oil and household hazardous waste may be collected at a facility pursuant to 310 CMR 19.207(10).

Hazardous waste will not be accepted at the Facility.

(b) The operator shall implement a program, approved by the Department, for detection and exclusion of hazardous wastes.

In the event that hazardous material is encountered, the Facility will contracted with an area emergency response company to provide any necessary hazardous waste removal and related cleanup services. Hazardous material encountered will be segregated and isolated within the building until such time that the response contractor removes the material from the Facility.

(c) The operator shall, within 24 hours, notify the Department and the Board of Health of the discovery of any material subject to the Hazardous Waste Regulations, 310 CMR 30.000: Hazardous Waste.

Material subject to Hazardous Waste Regulations will be noted on the Facility's daily log for incoming material. The MassDEP and the Town Board of Health will be notified within 24 hours of any such materials being discovered.

2.2.10 Household Hazardous Waste and Waste Oil Collections at Handling Facilities

If household hazardous waste and waste oil are collected at handling facilities, the household hazardous waste and/or waste oil shall be collected with prior notice to MassDEP and in compliance with either:

- (a) 310 CMR 30.392: Events for the Accumulation of Household Hazardous Waste and/or Hazardous Waste Generated by Very Small Quantity Generators, or
- (b) 310 CMR 30.393: Centers for the Accumulation of Hazardous Waste Generated by Households and/or Very Small Quantity Generators.

Household hazardous waste and waste oil will not be collected at the Facility.

2.2.11 Bulky Wastes

- (a) An operator may accept bulky wastes where:
 - (1) The handling of such wastes is consistent with the facility's site assignment and/or permit; and,
 - (2) The handling of such wastes can be carried out in a manner that is manageable and compatible with the facility's Operation and Maintenance Plan and environmental control systems.

Recyclable bulky items, consisting of large metal items, white goods, etc., will be removed from the waste stream will be directed to the recycling area. Recyclables will be temporarily stored on site prior to removal off site to area recycling facilities. Non-recyclable bulky items, such as furniture and mattresses, will be pre-crushed prior to transporting off site for disposal.

(b) The Department may disallow or place conditions on the handling of bulky waste at a handling facility in order to protect the engineering or operational integrity of the facility.

Factual regulation.

(c) The Board of Health may, by regulation, specify the maximum size of large, heavy, or bulky items to be managed at the handling facility and may prohibit altogether the handling of certain items.

Factual regulation.

(d) If brush is accepted at the handling facility, provisions should be made for the brush to be received in bundles no larger in size than can be handled in an acceptable and sanitary manner by the specific equipment. Brush should not be allowed to accumulate beyond 48 hours after deposition at the handling facility.

Loads containing brush will be directed to the recycling area. Brush will not be allowed to accumulate beyond 48 hours after deposition.

2.2.12 Liquid Wastes

(a) No liquid wastes shall be managed at a handling facility. with the exception of septage, contained liquid wastes generated by and produced in the normal operation of a household shall not be considered to be liquid wastes unless expressly excluded through 310 CMR 19.017: Waste Bans.

Liquid waste will not be accepted at the Facility.

(b) For the purpose of 310 CMR 19.130, liquid wastes means any material that drains freely or contains free draining liquids, as determined by using the Paint Filter Liquids Test, Method 9095 as described in USEPA Publication SW-846.

Factual regulation.

2.2.13 Bird Hazards

The operator of facilities located in the proximity of airports shall operate and maintain the facility in such a manner to minimize, to the extent practicable, the potential for the facility to pose a bird hazard to aircraft.

Material delivered to the site will be directed to the transfer station building. Transfer trailers transporting material from the site will be covered prior to exiting the loading well area of the building. The regular removal of waste material from the site and covering of trailers entering and exiting the site assists in minimizing the opportunity for scavenging by birds. A copy of the Facility Bird Control Plan is presented in Appendix C.

2.2.14 Dust Control

The operator shall 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 waste handling facility operator to prevent nuisance conditions. Water shall not be used for dust control in amounts that produce excessive infiltration, ponding, runoff or erosion.

To minimize dust generation at the site, all discharging and handling of material will be performed on the concrete tipping pad. To minimize dust generation from vehicles entering and exiting the Facility, paved areas on the site will be cleaned by means of a blower on a regular basis. In addition, Mello will utilize a street sweeping company for cleaning of the access road and paved areas of the site as necessary.

2.2.15 Vector Control

(a) The operator shall cause routine waste handling facility operations to be carried out promptly in a systematic manner and shall take preventative measures to maintain conditions unfavorable for the attraction or production of insects, birds, rodents and other vectors.

The Facility's practice of regularly removing waste from the tipping floor limits the opportunities for insects or rodents to obtain access to waste materials and eliminates any opportunity for insects or rodents to find harborage in the waste mass.

(b) The Department may require a routine program for the control and elimination of insects and rodents at the handling facility site. The operator shall cause supplemental control measures, including, but not limited to, the use of effective insecticides and rodenticides, to be implemented when necessary.

In the event that vermin are detected, the Facility will contract for the services of a local extermination company to implement suitable control measures.

(c) The application of pesticides shall be made only by a pesticide operator licensed by the Massachusetts Pesticide Board.

The Facility will only contract with extermination companies possessing a license from the Massachusetts Pesticide Board.

2.2.16 Control of Windblown Litter

(a) The operator shall take measures to prevent the scattering of refuse and windblown litter, including incorporating litter fencing, natural barriers or other devices to prevent the scattering of solid waste beyond the facility.

Discharging of material delivered to the Facility will be confined within the building. All vehicles delivering material to the Site will be covered. Vehicles transporting material from the Site will be covered prior to exiting the Site. The operator located at the tipping floor area will be responsible for the maintenance of the area around the building including the collection of any windblown litter. In addition, personnel on the Site will be responsible for maintaining the yard area clean of dust and litter. Paved areas of the Site will be cleaned on a regular basis and litter on the Site collected for disposal.

(b) The operator shall provide for routine maintenance and general cleanliness of the entire handling facility area. Such provisions are to be detailed on the engineering plans or written operating procedures.

Personnel on the Site will be responsible for maintaining the yard area clean of dust and litter. Paved areas of the Site will be swept and litter collected for disposal on a regular basis.

2.2.17 Staffing

(a) The operator shall provide an adequate number of trained staff to ensure that the facility is operated and maintained as designed and in accordance with good solid waste management practices.

A full-time Director of Operations will direct the daily operations at the Facility. Operation of the Facility will be performed by three yard attendants, two equipment operators and a scale house attendant.

(b) During posted hours of operation, the operator shall be continuously present at the handling facility.

Personnel shall be on Site during the Facility operating hours.

2.2.18 Employee Facilities

- (a) The operator shall provide proper shelter and facilities for employees working at the facility. The shelter and facilities shall contain:
 - (1) Sufficient light and heat;
 - (2) A safe drinking water supply;
 - (3) Sanitary handwashing and toilet facilities;
 - (4) An operational telephone or two-way radio system; and,
 - (5) Other equipment or appurtenances necessary for full compliance with full compliance with federal and state worker health and safety requirements.

Attendants' facilities will be located within the scale house adjacent. The scale house will be equipped with telephones and with sufficient light and heat. Drinking water will be provided by means of bottled water located within the scale house. Sanitary facilities will be located within the transfer station builing. The scale house attendant and operators will be provided with cell phones/walkie-talkies to allow communication between the scale house and the handling facility.

2.2.19 Accident Prevention and Safety

(a) All employees shall be instructed in the principles of first-aid and safety and in the specific operational procedure necessary to prevent accidents.

The Facility will implement a Health and Safety Training Program for all of its employees. The Director of Operations will be responsible for implementing the company's Health and Safety Program at the Facility, maintaining health and safety records and training employees. All personnel at the Facility will be required to attend the Health and Safety Training Program. In addition, first aid supplies and emergency telephone numbers will be available in the scale house.

(b) The operator shall provide and maintain adequate first-aid supplies at the site at all times.

A first-aid kit will be maintained in the scale house.

(c) The operator shall provide for two-way radios or telephones and ensure that the numbers for emergency medical care and ambulances are posted at the site.

Telephones and a list of numbers for emergency medical care and ambulances will be posted in the scale house. The scale house attendant and equipment operators will be provided with a cell phone/walkie-talkie to allow communication between the scale house and the transfer station.

2.2.20 Fire Protection

The operator shall take suitable measures for the prevention and control of fires at the facility by complying with at least the following:

(a) Make available at the facility an adequate supply of water under pressure with sufficient fire hoses, unless a fully-manned fire station is located within two miles;

The Facility building will be equipped with a pull alarm system tied to an alarm company. Fire extinguishers will be mounted on all equipment at the scale house. Water for fire protection will be provided by means of a fire hydrants located at the Site. Additional fire protection, if necessary, will be provided by the Town of Georgetown Fire Department.

(b) A separate area shall be provided, located away from combustible materials, refuse and buildings, for quick dumping and quenching or snuffing of hot loads;

In the event that a hot load is delivered, the Facility will have adequate space to the front of the building that will be paved and will allow Facility staff to control any hot loads. Hot loads will not be accepted at the Facility.

(c) Arrange for a nearby fire department to provide emergency service whenever called; and,

The Georgetown Fire Department will provide emergency service as needed.

(d) Mount detachable fire extinguishers, maintained in working order, on all equipment and in all buildings.

Refer to Item No. 2.2.20(a).

(e) The operator shall ensure that no materials are stored, held, maintained or placed at a handling facility in such a manner as to pose a fire hazard.

No materials will be stored, held, maintained or placed at the Facility in such a manner as to pose a fire hazard.

(f) The operator shall be responsible for seeking fire-fighting assistance, initiating and providing assistance and/or resources for fire-fighting actions until all smoldering, smoking and burning cease.

Refer to the fire fighting measures in Section 2.2.20(c).

2.2.21 Recycling Operations

(a) The operator may make provisions for the recycling of materials provided that a definite plan of procedure is implemented and followed to enable said operation to be carried out in an organized, sanitary, orderly and dependable manner with minimal interference to the routine handling facility operations.

The Facility will promote the goals of MassDEP's Comprehensive Waste Prevention Strategy to divert as much as possible from the waste stream through recycling and reuse and disposal of unrecoverable solid waste in an environmentally sound manner. C&D material delivered to the site will be presorted, removing recyclables consisting of ferrous metals, nonferrous metals and white goods prior to hauling

offsite for disposal. Recyclables recovered will be transferred to the recycling area prior to removal on a regular basis for resale to recycled material markets. In compliance with 310 CMR 19.017, Waste Control, waste ban materials will be removed from the waste stream prior to transferring from the site.

(b) Any container, or specially designed enclosed area, used for the storage of recyclable materials (such as glass, cans, paper, etc.) shall be clearly identified and maintained in a clean and sanitary condition and the surrounding areas shall be kept in a similar condition.

Recyclable materials will be stored within clearly identified roll-off containers and designated areas located within the residential drop-off area.

(c) All accumulated recyclable materials shall be removed from the facility at least every 60 days and/or at such other times as may be specified by the Department.

Recyclable materials will be removed from the Facility on a regular basis but no greater than 60 days.

(d) Recyclable materials of a nature or in quantities that cause odor or pose a threat to the public health or are detrimental to the environment or the surrounding area shall not be accumulated.

Recyclable materials will be removed on a regular basis so as not to cause odor or pose a threat to public health. The container for bagged Municipal Solid Waste (MSW) will be emptied within the building at the end of each day.

2.2.22 Records for Operational and Plan Execution

(a) The operator shall maintain a daily log to record operational information, including, but not limited to, the type and quantity of solid waste received and the status of all environmental control or monitoring systems.

A daily log recording the type and quantity of incoming and outgoing waste and recyclables and any deviations from the O&M Plan shall be maintained within the scale house.

(b) The operator of existing or new handling facilities receiving 100 tons or more per day shall weigh all incoming solid waste.

Factual Regulation.

(c) Operators of handling facilities that receive less than 100 tpd shall, on a daily basis, estimate the total weight and volume of waste delivered based upon the capacity of the vehicles which delivered solid waste to the facility.

Vehicles entering and exiting the Site, with the exception of residential customers, will be weighed at a truck weighing facility. The weighing facility will consist of two truck scale and a scale house. The scale will be monitored by an attendant located within the scale house.

(d) The operator shall submit to the Department, no later than February 15th of each calendar year, an annual report summarizing the facility's operations for the previous calendar year or portion of a calendar year that waste is handled at the facility. Where the Department provides a form for annual reporting, the report shall be made on, and shall contain, all information as requested by that form. Otherwise, the report shall describe and summarize:

- 1. the amount of solid waste handled during that year with the quantity reported in tons;
- 2. all environmental monitoring and sampling data trends from groundwater, surface water and gas monitoring systems from the monitoring required by the facility permit; and
- 3. a demonstration of how the handling facility's operations during the year complied with the provisions of the recycling and composting plan contained as part of the facility's solid waste management permit.

Factual regulation.

2.2.23 Screening and/or Fencing

The Department may require that the handling facility be suitably screened by fencing, or other approved methods, to shield the area from adjoining properties.

Access to the site will be controlled by means of locking gates installed along Carleton Drive. The existing locking gate will minimize the opportunity for illegal dumping and access to the site.

2.2.24 Open Burning

No open burning of any refuse, including brush, wood or diseased trees shall be permitted at the handling facility site at any time of the year except as may be expressly permitted by the Department pursuant to 310 CMR 7.07, Open Burning.

Open burning will be not performed at the Facility.

2.2.25 <u>Inspections</u>

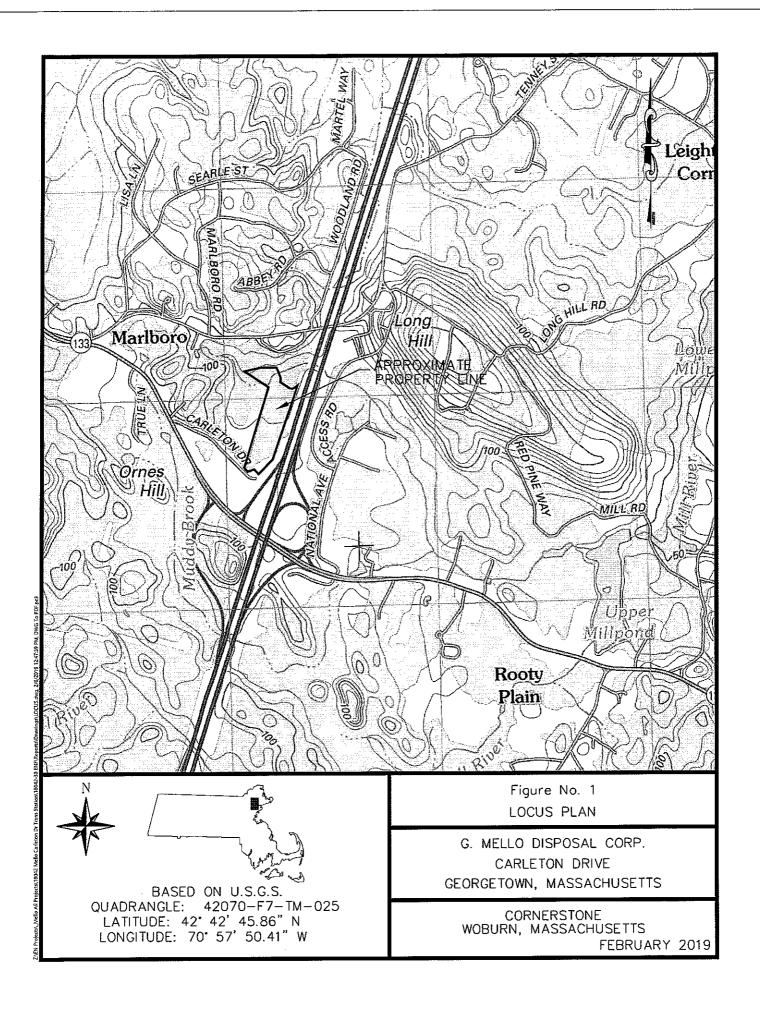
The facility shall be inspected by a third party inspector in accordance with 310 CMR 19.018, and such third-party inspection shall be conducted in accordance with the frequency and other requirements of 310 CMR 19.018, unless more frequent inspections or more stringent requirements are contained in the terms of any approval, order or other document issued by the Department pursuant to 310 CMR 19.000.

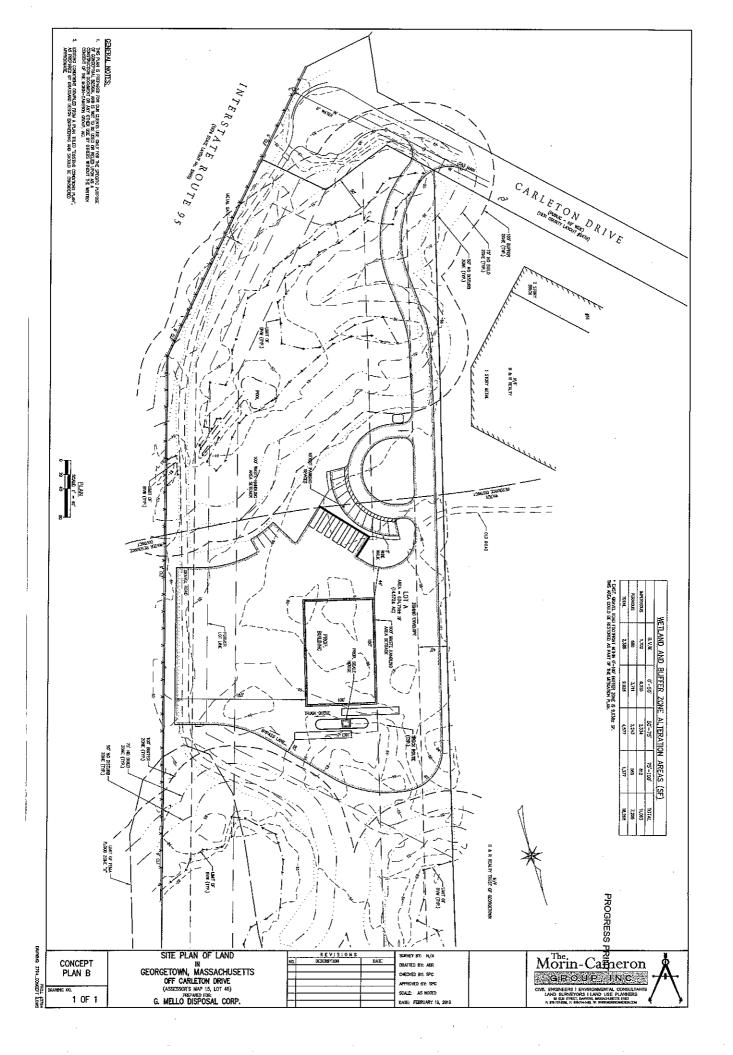
The Facility will be inspected by Cornerstone Construction Services, LLC, Woburn, Massachusetts, a qualified engineering firm with experience in solid waste management. Inspections will be carried out on a semi-annual basis by a Registered Professional Engineer.

2.2.26 End-of-life Mercury-added Products

Mercury-added products that are hazardous waste pursuant to 310 CMR 30.000: Hazardous Waste shall be handled in accordance with 310 CMR 30.000: Hazardous Waste. Mercury-added products that are not hazardous waste shall be handled in accordance with 310 CMR 76.05(2).

Mercury-added products will not be accepted at the Facility.







Site Assignment and Authorization to Operate





PROPOSED WASTE BAN COMPLIANCE PLAN G. MELLO TRANSFER STATION CARLETON DRIVE GEORGETOWN, MASSACHUSETTS

Prepared For:

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Prepared By:



9f Presidential Way Woburn, Ma 01801

February 6, 2019

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E	Sample Letter to Generator Regarding Failed Waste Load	
F	Waste Ban Signage	
G	Guidance for Construction and Demolition Handling Facilities Compliance with MassDEP's Waste Ban Regulations and Waste Ban Compliance Plans with regard to Clean Gypsum Wallboard dated May 30, 2013	
Н	Training	
DRAV	WINGS	
C-1	Partial Site Plan	
SK-1	Floor Plan	

SECTION 1

INTRODUCTION

1.1 GENERAL

This report has been prepared in compliance with the requirements of 310 CMR 19.017, Waste Bans, to present the Waste Ban Compliance Plan for the G. Mello Disposal Corporation (Mello) Solid Waste Transfer Station (Facility) located at Carleton Drive within the Town of Georgetown (Town), Massachusetts.

1.2 <u>SITE DESCRIPTION</u>

The project site is located in the southeastern portion of the Town. The site is depicted as Lot No. 46 on the Town of Georgetown Assessor's Map No. 15. The owner of record is the East West Realty Trust, 6 Norino Way, Georgetown, MA 01833. The site consists of a parcel of land totaling approximately 14.6 acres of land consisting of previously disturbed areas, by undeveloped woodland areas and wetlands. The site is generally bound northerly by residential properties, easterly by Interstate 95, westerly a commercial and industrial property and southerly by Carleton Drive. Figure No. 1, Locus Plan, presents the location of the Facility within the Town.

1.3 MELLO TRANSFER STATION DESCRIPTION

1.3.1 GENERAL

Access to the site is via a curb cut along Carleton Drive. A paved access road will extend from Carleton Drive to the Facility. Vehicles delivering material to the Facility will proceed to the truck weighing facility. Signs posted at the entrance to the site will detail the hours of operation and list acceptable and unacceptable materials for receipt at the Facility. A locking gate will be located at the entrance to the site along Carleton Drive controls access to the Facility.

The operation of the Facility will be under the overall supervision and direction of Mello. Mello is experienced in the operation of transfer station facilities, having operated the G. Mello Disposal Facility located at 203 Main Street, since 1981. The daily operation of the Facility will be under the direct supervision of Jason Mello, General Manager.

TABLE No. 1: Summary of Proposed Operation

Tonnage Waste Materials: 500 tons per day (tpd) average

550 tpd max

177,500 tons annually

Hours of Operation(1):

Handling Facility Monday – Friday, 6:00 a.m. – 5:00 p.m.

Saturday, 7:00 a.m. – 4:00 p.m. Sunday, 7:00 a.m. – 12:00 p.m.

Residents Monday – Thursday, 7:30 a.m. – 3:00 p.m.

Friday – Sunday, 7:30 a.m. – 12:00 p.m.

Waste Handled: Category 1 Construction and Demolition (C&D) Waste

Category 3 Bulky Waste Municipal Solid Waste (MSW)

Waste Ban Materials

Equipment:

Receiving/Presorting 2 Truck Scales

1 Rubber-Tired Loader

1 Excavator equipped with Grappling Claw

Transfer Equipment 100 cubic yards (cy) Open Top Trailers

Operator: G. Mello Disposal Corporation

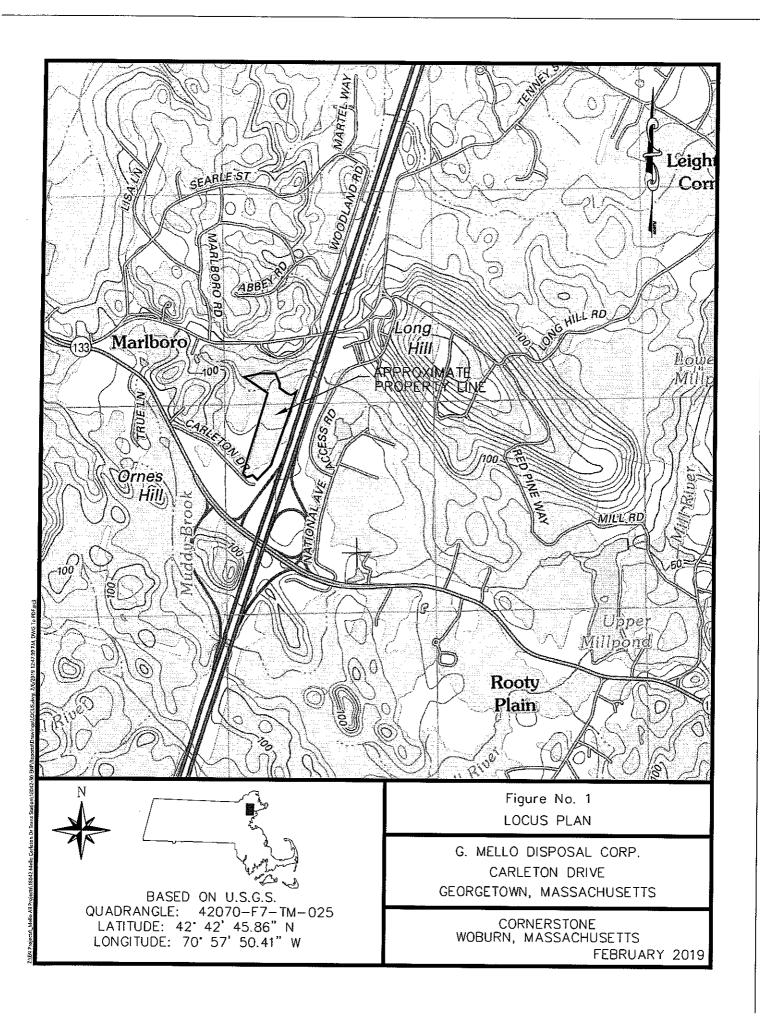
95 Tenney Street

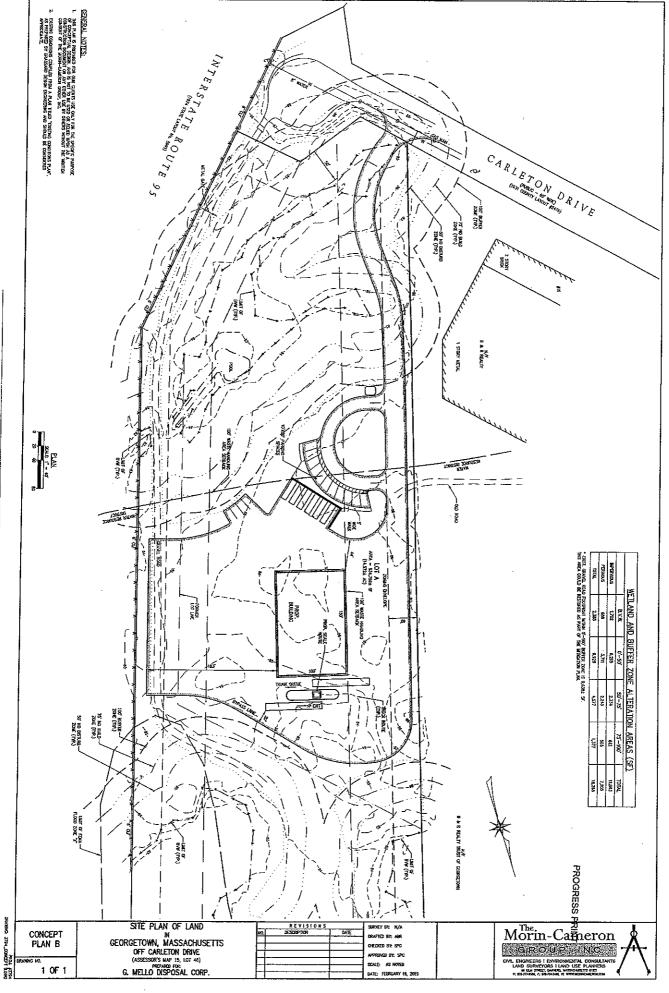
Georgetown, MA 01833

Contact: Jason Mello, General Manager

Telephone: 978.352.8581

⁽¹⁾ Hours of operation are for receipt of material. Shipping, processing and maintenance activity may be performed outside the indicated hours of operation.







Attachment G

Part A: General Information

1. Facility Information						
Facility Name: G. Mello Transfer St. DEP Facility # TBD	ation	Street Address: Carleton Drive				
City, State, ZIP: Georgetown, MA 018:	City, State, ZIP: Georgetown, MA 01833					
Telephone Number: 978-352-9948 e-mail jason@mellodisposal.com		tact Name, Title: Jason Mello, General Manager				
Construction and Demolition Waste Facility	ty Permitted	y				
2. Owner Information						
Owner Name: G. Mello Disposal Con	rp.	Street Address: 95 Tenney Street				
City, State, ZIP: Georgetown, MA 01833	Con	tact Name, Title: Jason Mello, General Manager				
Telephone Number: 978-352-8581	Telephone Number: 978-352-8581					
e-mail jason@mellodisposal.com						
3. Operator Information						
Operator Name: G. Mello Disposal Co	orp.	Street Address: 95 Tenney Street				
City, State, ZIP: Georgetown, MA 01833	3 Con	tact Name, Title: Jason Mello, General Manager				
Telephone Number: 978-352-8581						
<i>e-mail</i> jason@mellodisposal.com						



Part B: General Requirements

1. Application Requirements

Under 310 CMR 19.017, each solid waste facility must submit either a revised waste ban compliance plan or a waste ban plan certification form, as described below, to MassDEP by July 1, 2014.

Landfills, municipal waste combustors and construction and demolition waste handling facilities need to submit a revised Waste Ban Compliance Plan with a BWP SW 45 permit application form, which provides for presumptive approval under 310 CMR 19.034. This form is available on http://www.mass.gov/eea/agencies/massdep/recycle/approvals . The exceptions to this are if the facility proposes a significant physical modification as part of its waste ban compliance plan or if the plan deviates significantly from MassDEP's waste ban plan template. Solid waste transfer stations that are not construction and demolition debris waste transfer stations need to prepare a revised Waste Ban Compliance Plan. However, under 310 CMR 19.035, they do not need to submit this plan to MassDEP as long as the plan is consistent with the guidance document. The plan must be kept on site and available for MassDEP review. Only a waste ban plan certification form is required to be submitted. This form is available on http://www.mass.gov/eea/agencies/massdep/recycle/solid/massachusetts-waste-disposal-bans.html#5 .				
	Check which form is being submitted.			
certification	Solid Waste transfer station (not C&D waste transfer station) (does not require submittal of waste ban plan)			
BWP SW 45	Alternative Review Process (presumptive approval process under 310 CMR 19.034)			
BWP SW 22	Landfills – Minor Modifications			
BWP SW 21	Modification of a Small Handling Facility Incinerators not submitting BWP SW 45 also submit this form			
Will conduct an	nts of waste ban compliance plan be communicated to relevant staff? Check all boxes that apply. nual waste ban training to staff. Distribute compliance plan to staff. Gularly scheduled meetings. Other			
areas that inform use tubes, commercial or paper, single polyme Attachment F of the	graphs, or 8.5" X 11" specification sheet, of signs posted or to be posted at facility entrance and waste receiving are so f the prohibition against disposal, or transfer for disposal, of asphalt pavement, brick, concrete, cathode ray reganic material, glass containers, lead batteries, leaves and yard waste, metal, metal containers, recyclable or plastics (narrow-neck plastic containers), white goods, whole tires at landfills and wood at landfills. (See Guidance Document for sample signage) [Mate] [Mate] [Mate]			



Bureau of Waste Prevention

Waste Ban Compliance Plan

Part C: Ongoing Waste Stream Monitoring

1. Detection
How will the facility screen all incoming loads for unacceptable quantities of restricted materials? See Guidance Document Section
V - "Ongoing Waste Stream Monitoring/Inspection" for description.
Please check all that apply:
■ Staff will inspect vehicles prior to dumping
Staff will look for banned materials as waste is dumped by truck.
Staff will look for banned materials by observing and communicating with residents disposing of waste in designated areas.
Staff will look for banned materials as waste is handled by facility personnel operating heavy equipment (i.e., a bulldozer, front end loader).
Staff will look for banned materials during separation process on tipping floor.
Staff will look for banned materials during separation process on picking lines
Other
2. Record Keeping
Pursuant to 310 CMR 19.017 (5), the facility operator will record and maintain the following information on all loads discovered through ongoing monitoring to contain banned material above Action Levels delivered in vehicles or containers with a capacity greater than 5 (five) cubic yards (See Attachment A of the Guidance Document for suggested format):
• Date of inspection;
 Origin of waste (if known); company, address, contact name, phone number, job site name and address
Quantity of restricted materials discovered;
Hauler and truck number;
Scale ticket number (or other facility specific load record number) Size of a control of the second number o
 Disposition of restricted materials; and Documentation of communication follow-up with haulers and/or generators connected with failed loads, as described in the
Documentation of communication follow-up with naulers and/or generators connected with failed loads, as described in the Guidance Document, Section VIII.
Please check:
Attached is an example of facility's Ongoing Monitoring Recording Sheet
Facility Operator will record this information on the attached Ongoing Monitoring Recording Sheet
Facility does not accept loads in vehicles or containers with a capacity greater than 5 (five) cubic yards



Part D: Comprehensive Load Inspections

Please note: If the facility serves customers with vehicles or loads with a capacity under 5 cy it is not required to conduct comprehensive load inspections. Please proceed to Part E: Failed Load Follow-Up.

Facilities should conduct a minimum number of comprehensive load inspections per month as indicated on the following Inspection Frequency Chart:

Please check the appropriate box on the chart below based on the facility's permitted size.

Inspection Frequency Chart

Facility Size in Permitted Tons per day	Minimum Number of Vehicles to Inspect per Month (vehicles must have capacity of greater than 5 cubic yards)			
Municipal transfer station with no private haulers or commercial users with vehicles with a capacity over 5 cy	0			
1-99	4			
100-299	8			
300-499	12			
500-999	16			
1000 +	20			

2. Load Selection

The proposed method of selecting vehicles for inspection should be random. Please refer to the Guidance Document, Section VI for description. Please describe below how loads will be randomly selected for comphrensive inspections. Attach additional pages if necessary.

Selected incoming loads will undergo a random comprehensive waste inspection. Equipment operators shall conduct inspections of all incoming materials including completion of daily record form with failed load information, if any. Selected incoming loads will undergo a random comprehensive waste ban inspection at a frequency of 16 vehicles per month. G. Mello Transfer Station will use a random number generator each month to identify operating days on which Comprehensive Load Inspections are to be completed. Based on the average daily volume of vehicle trips to the facility, a random truck number will be selected for each inspection day. The Scale Operator will be responsible for identification of the selected vehicle to be inspected and will communicate with the facility's equipment operators as to which vehicles are to undergo load inspection. If no vehicle greater than 5 cubic yards (cy) utilizes the facility on a selected day, the next vehicle with a capacity of 5 cy or greater will be inspected.



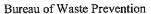
3. Inspection Procedure

See Guidance Document, Section V for a description of inspection procedures. Please describe below how the facility will conduct its comprehensive load inspections for all banned materials. Include information on which personnel are involved and what kinds of equipment will be used:

Personnel: Equipment Operator, Yard Attendant and Scale House Attendant.

Equipment: Front end loader and excavator equipped with grappling claw.

Procedure: Refer to Inspection Procedure.





4. Record Keeping

Pursuant to 310 CMR 19.017 (5) the facility operator will record and maintain the following information on comprehensive load inspection activities. See Attachment B of the Guidance Document for suggested format.

- Date and time of inspection
- Origin of waste for failed loads (if known) company, address, contact name, phone number, job site name and address
- · Quantity of restricted materials discovered
- Tons or cubic yards of waste in each inspected load
- Hauler name and address and truck number
- Scale ticket number (or other facility specific load record number)
- Disposition of the load and, if accepted, the banned material
- Documentation of communication follow-up with haulers and/or generators connected with failed loads, as described in the Guidance Document.

Please check:

- Attached is an example of facility's comprehensive inspection recording sheet
- Facility operator will record this information on the attached sheet

Part E: Failed Load Follow-Up

1. Communication

Please refer to the Guidance Document for a description of communication procedures.

- WASTE SOURCE COMMERCIAL/PRIVATE HAULER
 - Please provide sample letters that will be sent to any hauler and generator (where it can be determined) that delivers a failed load to the facility, describing which material(s) caused the failure, and encouraging the hauler to work with its customers to separate their trash. Accompanying this letter should be a MassDEP Fact Sheet explaining the waste bans. Refer to the Guidance Document, Attachment C, for suggested language, and Attachment D for the fact sheet.
- WASTE SOURCE MUNICIPALLY-RUN OR CONTRACTED COLLECTION

Please provide a sample letter that will be sent to any municipality from which unacceptable quantities of banned material was received, describing the materials and encouraging the community to contact MassDEP for technical assistance. Accompanying this letter should be a MassDEP Fact Sheet explaining the waste bans. See Attachment E for suggested language and Attachment D for the fact sheet.

- WASTE SOURCE -WASTE DELIVERED IN VEHICLES WITH A CAPACITY OF 5 CUBIC YARDS OR LESS How will the facility inform individuals identified through ongoing monitoring that are not separating banned material from their solid waste? (check all that apply)
 - Verbally inform the individual about the waste bans and that the facility is not allowed to mix restricted materials with solid waste
 Give the individual the MassDEP Waste Ban Fact Sheet or similar written material
 Direct the individual to the facility's recycling and/or composting area
 Give the individual a recycling brochure
 Other
 N/A The facility does not service individuals delivering waste in small vehicles



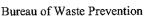
2. Failed Load Disposition

- When a failed load is identified, the facility will adhere to the procedures outlined below in the following hierarchy presented:
- Reject or reload if there are substantial quantities of recoverable materials in the load and there are reasonable outlets for the material, or
- Accept, separate, and recycle material(s) causing the load to fail.
- For asphalt pavement, brick, concrete, metal, wood and/or clean gypsum wallboard transfer to a facility that has an approved waste ban compliance plan that includes diversion of these materials for recycling or reuse, or can demonstrate that they will not accept restricted material for disposal, or further transfer for disposal.
- As a last resort, dispose (or transfer for disposal), when the waste cannot be recycled, rejected or reloaded because reloading the waste would endanger workers or substantially disrupt facility operations. The facility operator's rationale for disposing a failed load must be recorded and retained in facility's operating logs.

		Other	(please	describe)
--	--	-------	---------	-----------

3. Materials Management

On an average day, how will the facility manage each restricted material				
	Reject/Reload	Accept/Separate/ send to recycling/reuse facility	Transfer to another permitted facility for separation	Dispose/transfer for disposal
Lead Batteries		X.		
White Goods		XI		
Whole Tires (at landfills)		X	_	
CRTs		X		
Commercial Organic Material		X		X
Glass Containers				X
Metal Containers		X		X
Single-Resin Plastic Containers		N N		X
Recyclable Paper		K)		X
Leaves		X		X
Yard waste		X		X
Asphalt Pavement, Brick and/or Concrete		E	X	X
Metal		X	X	X



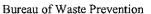


Wood			<u> </u>	K.
Clean gypsum wallboard		u		
Comments				
 Identify (name and location material type. 	-			
recyclable material at the re permit describing its opera	eceiving facility. If lo	ring facilities to be used when ocated out-of-state, attach the r	transferring waste mater eceiving facility's state	rials for separation of issued operating
(3) Identify the proposed received	ving facility to be use	ed for materials disposal.		
Materials Management (con	tinued)			
Please describe how materials will	be handled for recy	cling:		
Individuals place materials in d	esignated areas			
Materials will be manually and	or mechanically sepa	rated by facility		
Other:				
4444	·			erun .

4. Construction and Demolition Handling Facilities

If the facility accepts construction and demolition waste, performs separation operations for recyclable materials, and sends the remaining materials to another solid waste facility for disposal or reuse, all of section 4 must be completed. Facilities which accept 50 tons per day or more of C&D waste and transfer all C&D waste to another permitted facility for separation and do not transfer for disposal need only demonstrate how they will comply with the following:

- In order for C&D Handling
 Facilities to maintain compliance with the requirement in approved Waste Ban Compliance Plans to separate clean
 gypsum wallboard to the maximum extent possible for recycling, the following measures are to be taken:
 - O Loads that include clean gypsum wallboard must be sorted, to the extent it can be done safely, to remove clean gypsum wallboard to the greatest extent possible <u>prior to</u> any mechanical processing of the C&D waste load.
 - o Facilities will not be allowed to transfer (including transfer to another C&D Handling Facility) mixed C&D waste loads that contain clean gypsum wallboard without first safely separating the clean gypsum wallboard for recycling.
 - o In order to be eligible to receive mixed C&D waste loads, a C&D handling facility must implement operating procedures to safely and effectively separate clean gypsum wallboard prior to transferring or processing C&D loads.





The C&	D waste handling facility will accept the following materials: (check all that apply)
X	Category 1 C&D Waste
	Category 2 C&D Residuals
X.	Category 3 Bulky Waste
X	MSW
	Leaf and yard waste
	Other (identify)

Attach the following information:

- In a narrative describe the methodology for handling, inspecting and removing waste ban materials for each waste type (e.g. dedicated processing equipment or manual sorting).
- In a narrative, describe the minimum staffing and equipment requirements based on daily tonnage handled.

 Justification for the minimum staffing requirements must be submitted based on historic operations at the actual facility or similarly equipped facility that demonstrate effective removal of recyclable materials.
- In a narrative, describe the sorting technologies (e.g. conveyors, picking lines, grapples) to be used at the facility and discuss the proposed maximum hourly throughput capacity based on the number of staff performing the separation operation.
- In a narrative, describe the maximum proposed daily tonnage limits for MSW (if applicable) and for Category 1 C&D Waste and the maximum daily tonnage limit for all incoming materials.
- Provide a plan depicting designated areas for incoming material inspection, tipping, processing, waste ban material storage, and outgoing waste material storage.



Bureau of Waste Prevention

Waste Ban Compliance Plan

Compliance Plan Checklist

Are the following items attached?

X Sample signage

Ongoing Monitoring Reporting Sheet

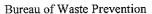
Sample letter to haulers

Sample letter to generators

Sample letter to contract municipality

Permit modification application

Is the certification below signed?





Certification

I hereby certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and, that based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the information is true, accurate and complete. I am fully authorized to make this attestation on behalf of this facility and am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

I also understand that adherence to this Waste Ban Compliance Plan constitutes compliance with the provisions of 310 CMR 19.017. I am aware that if the facility is found to be in non-compliance, MassDEP enforcement actions may be taken, including written notices of non-compliance, consent orders, unilateral orders or referral to the Attorney General's office. No modifications of this plan are permitted unless approved in writing by MassDEP

Signature:	Date:
Print Name: Jason Mello	Phone Number: 978-352-8581 e-mail: jason@mellodisposal.com
Title: General Manager	Organization Name: G. Mello Transfer Station



Definitions Applicable Only for Construction and Demolition Handling Facilities

For the purpose of Attachment G of the Waste Ban Compliance Plan Guidance, the terms herein shall have the following meaning:

<u>Action Level</u>: See Section IV Waste Ban Compliance Standard and Action Level Thresholds in Guidance for Solid Waste Handling and Disposal Facilities on Compliance with MassDEP's Waste Bans.

Banned Material Picking Area: Inside area designated by the Facility on the Facility Floor Plan for the storage, spreading, and inspection of tipped waste loads and the removal of Waste Ban Materials.

<u>Banned Material Storage Areas</u>: Inside and outside areas designated by the Facility on the Facility Floor Plan for the containerized storage of separated banned materials after separation from the incoming waste stream.

<u>Bulky Waste</u>: Waste items resulting from commercial or residential activities with low potential for recovering recyclable materials. In general, these materials are generated during commercial and residential building cleanouts and include items not generally accepted during pickup of the typical daily waste stream generated by commercial and residential activities. Examples of bulky waste include but are not limited to, furniture such as tables, chairs, desks, carpets, and temporary partitions such as cubicle walls and toys.

Categories of Waste Material:

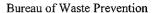
- Category 1 Construction and Demolition Waste consisting of C&D Waste and partially picked C&D waste. Partially picked C&D waste may include, but is not limited to, materials that may have been previously kicksorted off-site for the removal of metal, large pieces of wood, bulky waste, and Zero Tolerance Items.
- Category 2 -Construction and Demolition Residuals
- Category 3 Bulky Waste

Construction & Demolition Fines (C&D Fines): C&D waste processed through an initial size reduction and screening process in accordance with a MassDEP Beneficial Use Determination (BUD) and **prior to grinding** which is: (a) three inches or less (3" minus) in size; (b) consists primarily of soil and other inert materials, and (c) in no case shall exceed 35% organic content by volume.

Construction & Demolition Residuals (C&D Residuals): C&D material that remains after recyclable materials (asphalt pavement, brick, concrete, metals, wood, clean gypsum wallboard, etc.) have been removed from C&D waste to the greatest extent possible, which may include the C&D fines if not separated out from C&D waste. C&D residuals consist primarily of non-recyclable material.

Construction and Demolition Waste (C&D) Processing Facility: Means a handling facility where construction and demolition waste is brought, stored and processed (usually by sorting, crushing, shredding, screening, etc.) prior to reuse or transport to a solid waste disposal facility or to other types of facilities for recycling, recovery or reuse.

Construction and Demolition Waste (C&D) Transfer Station: Means a transfer station permitted Rev4/14





by the Department to accept 50 tons per day or more of construction and demolition waste. A C&D waste transfer station may accept other types of solid waste in accordance with its permit.

Construction & Demolition Waste (C&D Waste):

Building materials and rubble resulting from the construction, remodeling, repair or demolition of buildings, pavements, roads or other structures. Construction and Demolition waste includes, but is not limited to: metal, concrete, bricks, lumber, masonry, road paving materials, rebar, gypsum wallboard and plaster.

<u>Facility Floor Plan</u>; Plan submitted by the Facility within its Waste Ban Compliance Plan application.

<u>Failed Load</u>: A load which, when delivered to and inspected at a handling or disposal facility is determined to contain a quantity of materials banned from disposal above an Action Level defined herein.

<u>Inside Initial Inspection Area</u>: Inside area designated by the Facility on the Facility Floor Plan for the inspection of waste loads in delivery vehicles after entering the enclosed building and prior to tipping.

<u>Kicksorting</u>: Partial separation of C&D waste material which may include, but is not limited to, the removal of metal, large pieces of wood, bulky waste, Zero Tolerance Items (i.e. cathode ray tubes, tires, lead batteries, and white goods).

Outside Initial Inspection Area: Outside area designated by the Facility on the Facility Site Plan for the inspection of waste loads in delivery vehicles prior to entering the enclosed building and prior to tipping.

<u>Pre-Sorted Processed Waste Storage Area</u>: Inside area designated by the Facility on the Facility Floor Plan for the storage of C&D Residuals received from other C&D Handling Facilities.

Oueue Area: Outside area designated on the Facility Site Plan for the queuing of waste delivery vehicles prior to tipping.

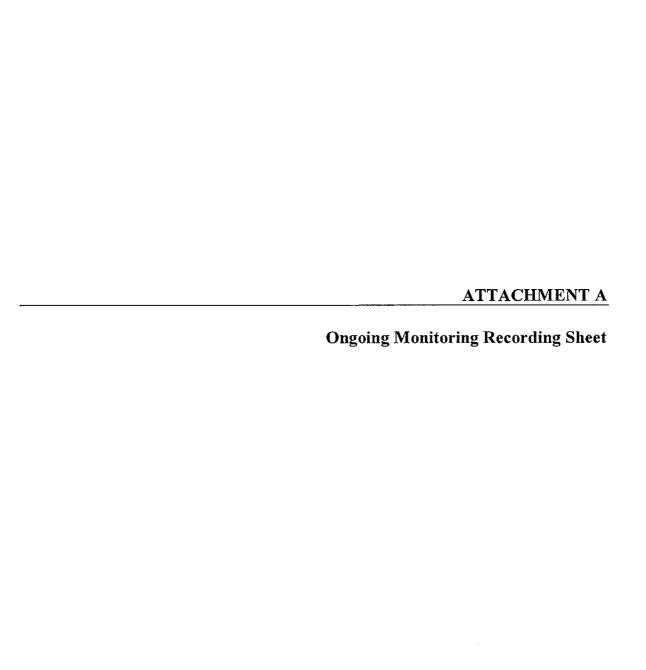
<u>Rejected Load:</u> A load which has been determined by the waste handling or disposal facility operator to be a Failed Load, and which the operator elects to refuse acceptance for handling or disposal, and which the operator must reload in the haulers original delivery vehicle or container and return to the hauler.

<u>Waste Ban Materials</u>: Restricted materials listed in 310 CMR 19.017. For purposes of this approval, Waste Ban Materials are further divided into Zero Tolerance Items and Waste Ban Materials subject to Action Levels above zero. Waste Ban Materials subject to Action Level criteria include recyclable paper, combined asphalt pavement, brick, and concrete, metal, wood, clean gypsum wallboard, glass, metal containers, commercial organic material, and leaves and yard waste.

Waste Tipping Area: Inside area designated by the Facility on the Facility Floor Plan for the tipping of waste loads.

<u>Waste Bulking Storage Area</u>: Inside area designated by the Facility on the Facility Floor Plan for the storage of C&D Residuals generated by the Facility prior to transfer for disposal.

Zero Tolerance Items: Items expressly prohibited from disposal listed in 310 CMR 19.017 where the Department has made an Action Level determination of zero. This includes cathode ray tubes (CRT), tires, lead batteries, and white goods.



Attachment A

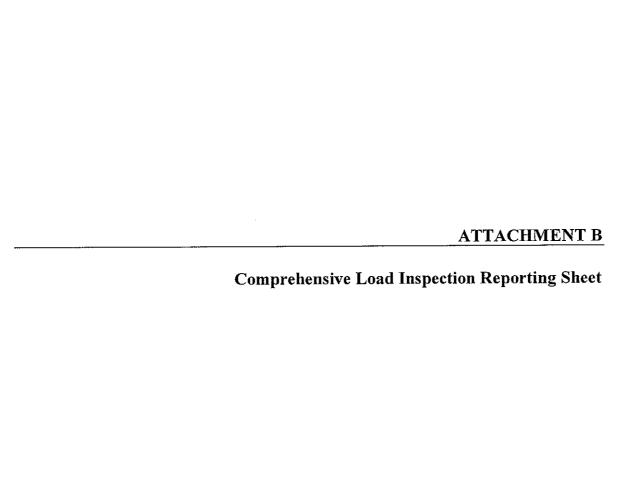
Ongoing Monitoring Recording Sheet Record every load over 5 cubic yards meeting or exceeding action level

Date:

						,									_	_			1
	Date	"Failed	Load"	Letter) Cont											White	Goods		Any
:																CRTs			Any
aged?	sal (not an opt	t landfills, whii	atteries, and Cl			TOTAL CONTRACT		-								Whole	Tires		Any (at landfills)
How was Failed Load Managed?	Reason for Disposal (not an option	for whole tires at landfills, white	goods, lead acid batteries, and CRTs)													Lead Acid	Batteries		Any
How was Fa	Dispose R	or	er.	for Disnosal			-						7.00		er Load	Asphalt Pavement,	Brick, Concrete, Metal, Wood, and/or	Clean Gypsum Wallboard	20% by volume
	Reject					-	j								terials F	Asp	Met ₂	ט	20
	Separate	ঔ	Recycle			-									on Level of Restricted Materials Per Load	Glass, Metal,	Plastic Containers		10% by volume
Material(s) Causing	Load to	Fail												٠	el of Re				10
Mat	Ľ°					1							-		ion Lev	Commercial	Organic Material		10% by volume
Truck Type															Acti	Com	Organio		10% by
Truck																Leaves &	Yard Waste		10% by volume
Hauling Company or Community (and	generator, when	known)			***************************************			10000	1,000		and the second	1 12 - 12	***************************************			Recyclable	Paper (includes corrugated	cardboard)	10% by volume
Scale I	# 0r	Time														Material			Quantity

Cumulative Banned Materials Action Level: 30% or more by volume for all restricted materials combined.

ontain banned material above action levels	Signature
All other waste loads were monitored and did not contain ba	Total number of waste loads delivered



Attachment B WASTE BAN COMPREHENSIVE LOAD INSPECTION REPORTING SHEET

Date & timeof inspection	Hauling Co.	Truck #		
Size of Truck Type of Truck	k Quantity of Waste			
Waste Generator Name	Waste Generator Location			
Banned Material Documentation Th		Ouring Inspection uantities)		
Material	QTY.	QTY.		
Recyclable Paper (includes corrugated cardboard)	10% or more of load by volume	%		
Single Polymer Plastic, Metal & Glass Cont	ainers 10% or more of load by volume	%		
White Goods	Any			
Lead Acid Batteries	Any			
Whole Tires (landfills only)	Any			
CRTs	Any			
Leaves and Yard Waste (loose)	10% or more of load by volume	%		
Leaves and Yard Waste (bagged)	Roll-off:20 or more bags Packer: 10 or more bags Smaller truck: 5 or more bags			
Commercial Organic Material	10% or more of load by volume	%		
Asphalt Pavement, Brick, Concrete, Metal, and/or Clean Gypsum Wallboard		%		
Combined Materials (Recyclable Paper; Gla Metal, and Plastic containers; Leaves and Ya Waste; Asphalt Pavement, Brick, Concrete, Wood and/or Clean Gypsum Wallboard: and Commercial Organic Material)	ard Metal, i	%		
	Notified driver that load failed inspection Requested generator information from hauler			
Accept, separate, and recycle t	he banned material.			
Reject or reload when substantia for the material.	al amounts of recoverable materials in the load	and reasonable outlets		
\square (not an option for white goods,	, when the waste cannot be recycled, rejected , lead acid batteries, whole tires, and CRTs	r).		
Use space below to explain reas	son for disposing, or transferring for disposal bann	edmaterials.		
signature of inspector	print inspector's name	title		
Rev 4/14				

ATTACHMENT C

Sample Letter from Facility to Hauler Regarding Failed Waste Load

Dear Customer:

A recent inspection of a waste load delivered by your company revealed materials restricted from transfer stations and disposal facilities. Massachusetts solid waste regulations (310 CMR 19.017) ban the disposal or transfer for disposal of certain recyclable and hazardous materials. A summary of the Department of Environmental Protection's (MassDEP's) waste ban regulations is included for your reference.

Specifically, truck number _____ on (date) delivered (material) to this facility. Please inform your customer(s) serviced by that truck about the state waste ban regulations. You may wish to forward this letter and the enclosed MassDEP summary to your customers as a reminder.

As a MassDEP-permitted facility, we are required to ensure that restricted materials are not accepted for disposal. If (name of hauling company) continues to deliver restricted material to this facility, your loads may be rejected, handling fees may be charged, and/or your drivers may experience delays due to the reloading of banned waste. Also, MassDEP will be monitoring our records of load inspections to follow up with repeat violators and may issue enforcement against (name of hauling company) and/or the waste generator.

We appreciate your cooperation in this matter.

Yours truly,

Jason Mello General Manager G. Mello Transfer Station





Commonwealth of Massachusetts Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

DEVALL PATRICS Governor

RICHARD K SULLIVAN JR. Secretary

> DAVID W. CASH Commissioner

Dear Solid Waste Facility Operator:

Massachusetts's solid waste regulations 310 CMR 19.017 ban the disposal, or transfer for disposal of certain recyclable and hazardous products. Known as "waste bans," the disposal prohibition on asphalt pavement, brick, concrete, clean gypsum wallboard, cathode ray tubes, commercial organic material, glass containers, lead batteries, leaves and yard waste, metal, metal containers, recyclable paper, single polymer plastics (i.e., narrow neck plastic containers), tires, white goods and wood have been phased in since 1991.

Solid waste facilities' "Authorization to Operate" are based, in part, on their compliance records with environmental regulations. Each facility, through its waste ban compliance plan, needs to demonstrate how the facility will not accept banned materials for disposal or transfer them for disposal.

Please inform your customers of these guidelines. A summary of the waste ban regulation is attached. If you have questions regarding this matter, please contact the appropriate MassDEP regional office.

Sincerely,

Nancy Seidman
Assistant Commissioner for the
Bureau of Waste Prevention

APPENDIX E

Sample Letter from Facility to Generator Regarding Failed Waste Load

Dear Customer:

A recent inspection of a waste load generated or contracted from your facility or program revealed materials restricted from disposal at transfer stations and disposal facilities. Massachusetts solid waste regulations ban the disposal or transfer for disposal of certain recyclable and hazardous materials. A summary of the Department of Environmental Protection's (MassDEP) waste ban regulations is included for your reference.

Specifically, (material) were delivered to this facility on (date). As a MassDEP permitted facility, we are required to ensure that restricted materials are not accepted for disposal. If (name of generator) continues to deliver restricted material to this facility, your loads may be rejected, handling fees may be charged, our drivers may experience delays due to the reloading of banned waste, and/or the matter may be referred to MassDEP for enforcement action.

MassDEP will be monitoring our inspection records to follow up with those who continue to deliver banned waste. For more information on how to start a new recycling program or improve an existing program, please visit www.recyclingworksma.com.

We appreciate your cooperation in this matter.

Yours truly,

Jason Mello General Manager G. Mello Transfer Station



Waste Ban Signage

	TO BE INSERTED

ATTACHMENT G

Guidance for Construction and Demolition Handling Facilities Compliance with MassDEP's Waste Ban Regulations and Waste Ban Compliance Plans with regard to Clean Gypsum Wallboard dated May 30, 2013



Commonwealth of Massachusetts

Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

DEVALL PATRICK

DMOTHY P. MUFFRAY

RICHARDIK SULLIVANUR Secretary

> KENNETH L. KUMMEU Commissioner

GUIDANCE FOR CONSTRUCTION AND DEMOLITION HANDLING FACILITIES COMPLIANCE WITH MASSDEP'S WASTE BAN REGULATIONS AND WASTE BAN COMPLIANCE PLANS WITH REGARD TO CLEAN GYPSUM WALLBOARD

May 30, 2013

This guidance regarding clean gypsum wallboard, applicable to Construction and Demolition (C&D) Handling Facilities, is intended to guide parties in complying with the Waste Bans in the Solid Waste Management Facility Regulations at 310 CMR 19.017 and with the current terms of Facility Permits and Waste Ban Plans with particular regard to the handling of clean gypsum wallboard. This guidance clarifies these requirements for C&D Handling Facilities and provides guidance on approaches the Massachusetts Department of Environmental Protection ("MassDEP") considers acceptable for complying with the Waste Bans and with the current terms of Facility Permits and Waste Ban Plans at these facilities. This guidance is not intended and cannot be relied upon to create rights, substantive or procedural, enforceable by any party in any litigation with the Commonwealth.

This guidance is about the separation of clean gypsum wallboard at C&D processing facilities and C&D transfer stations, collectively referred to as C&D Handling Facilities. A review of reports submitted by C&D Handling Facilities and inspections of C&D Handling Facilities by MassDEP has shown that the amount of clean gypsum wallboard separated before processing is not meeting the requirement established in current C&D facilities' Waste Ban Compliance Plan approvals—that clean gypsum wallboard must be removed to the greatest extent possible. As a result, an insufficient amount of clean gypsum wallboard is being recycled. In addition, excessive amounts of clean gypsum wallboard are ending up in fines and residuals, which can cause hydrogen sulfide gas problems if fines and residuals are used as alternative daily cover material at active landfills or landfill grading and shaping material during landfill closures.

Sorting and separation of clean gypsum wallboard can most effectively be performed prior to processing or further transportation. MassDEP has observed that it is not feasible to separate and collect wallboard once it has entered the processing system at a processing facility because it is destroyed when handled by large equipment and shredders.

To implement the clean gypsum wallboard waste ban, MassDEP previously issued guidance for solid waste management facilities on requirements for preparing revised Waste 8an Compliance Plans (see http://www.mass.gov/dep/recycle/solid/cdwbguid.pdf). Given the results of recent inspections of C&D

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-6751. TOD# 1-866-539-7622 or 1-617-574-6868

MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

Handling Facilities, MassDEP is providing this additional guidance to the regulated community to assist C&D Handling Facilities in complying with the Waste Ban regulations.

In order to maintain compliance with the requirement in approved Waste Ban Compliance Plans to separate clean gypsum wallboard to the maximum extent possible for recycling, the following measures are to be taken:

- Loads that include clean gypsum wallboard must be sorted, to the extent it can be done safely, to remove clean gypsum wallboard to the greatest extent possible <u>prior to</u> any mechanical processing of the C&D waste load.
- Facilities will not be allowed to transfer (including transfer to another C&D Handling Facility)
 mixed C&D waste loads that contain clean gypsum wallboard without first safely separating the
 clean gypsum wallboard for recycling.
- In order to be eligible to receive mixed C&D waste loads, a C&D handling facility must implement operating procedures to safely and effectively separate clean gypsum wallboard prior to transferring or processing C&D loads.

C&D Handling Facilities should already be implementing these requirements because these requirements are part of all C&D Handling Facility Permits and Waste Ban Compliance Plans by their current terms and this guidance provides clarification of existing requirements. C&D Handling Facility Permits and Waste Ban Plans will be updated at the next needed modification to reflect the clarifying terms of this guidance. Alternatively, a facility may submit to MassDEP a permit modification application (BWPSW21) requesting approval of other methods/means of complying with the substance of this guidance.

Nothing in this guidance relieves a C&D Handling Facility from compliance with the facility's MassDEP approved Waste Ban Compliance Plan, nor does it limit MassDEP's authority in approving or disapproving any Waste Ban Compliance Plan or determining compliance with an existing plan or enforcing an existing plan. MassDEP reserves the right to act at variance with this guidance and change it at any time without public notice.

MassDEP considers this guidance to be a further clarification of the enforceable provisions of C&D Facility Permits and Waste Ban Compliance Plans that are already in effect. After the effective date of this guidance, MassDEP will be enforcing the terms of those Permits and Plans with respect to the clarified requirements for handling of clean gypsum wallboard as set forth in this guidance.

ATTACHMENT H

Training

Annual Waste Ban Compliance Training G. Mello Transfer Station Georgetown, MA

G. Mello Transfer Station will complete annual training of all employees at the Site. Records will be maintained to document that employees have completed the required training. Major elements of the waste ban training will include:

• Waste Ban Compliance Responsibilities

G. Mello Transfer Station will provide written waste ban compliance responsibilities for specific employees at the facility including the scale house attendant, transfer station attendant and operators.

• Identifying Waste Ban Materials

Review and provide list of waste ban materials and required action levels.

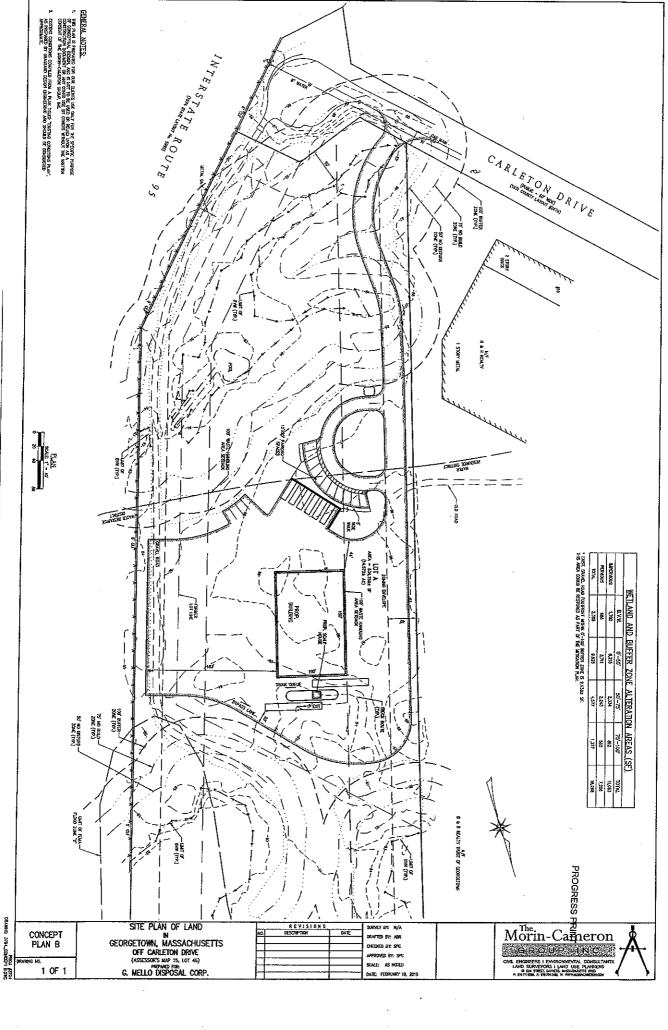
• Response Actions

Provide operators and attendants information on materials to be sorted and removed from the waste and recyclable material storage locations along with reporting and recordkeeping procedures.

Failed Load Letters

Review letters for haulers and generators. Detail responsibilities for determining failed loads as well as identify personnel responsible for preparation and transmittal of notification letters.







Bird Control Plan

PROPOSED BIRD CONTROL PLAN TRANSFER STATION FACILITY CARLETON DRIVE GEORGETOWN, MASSACHUSETTS

Prepared For:

G. Mello Disposal Corp. 95 Tenney Street Georgetown, Massachusetts 01833

Prepared By:



9F Presidential Way Woburn, MA 01801

February 6, 2019

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SECTION 1

INTRODUCTION

1.1 GENERAL

This Plan has been prepared to describe the procedures to be followed to control birds at the G. Mello Tranfer Station located at Carleton Dive, Georgetown, Massachusetts (Facility) in order that operation does not result in an increase in the number of birds, particularly the presence of gulls, visiting the site. The plan has been developed in compliance with the Department of Environmental Protection's (DEP's) Manual for Gull Control at Massachusetts Landfills. A copy of DEP's manual is presented in Appendix A.

1.2 <u>SITE DESCRIPTION</u>

The project site is located in the southeastern portion of the Town. The site is depicted as Lot No. 46 on the Town of Georgetown Assessor's Map No. 15. The owner of record is the East West Realty Trust, 6 Norino Way, Georgetown, MA 01833. Access to the site is via a paved access road extending from Carleton Drive to the Facility site. The site consists of parcel of land totaling approximately 14.6 acres of land occupied by undeveloped woodland areas and wetlands. The site is generally bound northerly by residential properties, easterly by Interstate 95, westerly by Lot No. 68 on the Town of Georgetown Assessor's Map No. 15 owned by B&R Realty Trust, Barry & John Enos Trustees, P.O. Box 183, Georgetown, MA 01833 and southerly by Carleton Drive. Figure No. 1, Locus Plan, presents the location of the Facility within the Town.

SECTION 2

BIRD MANAGEMENT PROGRAM

2.1 GENERAL

The overall bird management program will include a coordinated effort involving habitat management, dispersal techniques and exclusion techniques. The goal of the coordinated effort is to disrupt the daily pattern of feeding and loafing at the Facility.

2.2 HABITAT MANAGEMENT

Habitat management is the primary effort in bird control. The effectiveness of the dispersal techniques, discussed in Section 2.3, is limited by the attractiveness of the site to birds. All birds found at transfer stations, but especially gulls, prefer to loaf and wait for fresh waste to be dumped in level open areas where they have unrestricted visibility. Other conditions which attract birds include sources of drinking/bathing water and relatively large open areas devoid of vegetation or with mowed vegetation which provide a secure area for the birds to rest. Effective habitat management will involve:

- · Limiting access to solid waste placed onto the tipping floor;
- Maintaining the site in a clean and orderly manner. A responsibility of the Bird Control Officer will be to inspect the site to see that the property is being properly maintained;
- Limiting the ponding of water on paved surfaces on the site; and,
- Limiting the time solid waste is located on the tipping floor area of the building.

2.3 DISPERSAL TECHNIQUES

Dispersal techniques are also a critical element of bird control. The objective of the dispersal techniques is to prevent birds which may still be attracted to the site from landing. Dispersal techniques must be varied so that the birds do not become used to the method being employed so that it loses effectiveness. Techniques which will be used include the use of scare devices, human patrols, gull distress tapes and a scarecrow of a dead gull. These are discussed below.

2.3.1 Scare Devices

Scare devices include shotcrackers or whistlers, which are nonlethal, noise producing projectiles fired from a gun. Some have a time delay which allows them to travel nearer the gulls before exploding while others whistle as the projectile passes through the air. The Bird Control Officer will maintain a supply of shotcrackers/whistlers on-site.

The noise producing projectiles should be used by the Bird Control Officer during daylight hours. The projectiles will be fired when the birds are on the ground or attempting to land. The type of projectile used should be varied so that the birds do not become habituated to the particular device and it loses effectiveness.

2.3.2 Human Patrols

The Bird Control Officer is responsible to patrol the site to observe the effectiveness of the bird management techniques and to disperse birds. At least two patrols should be conducted each day the Facility is operating, one in the morning and the second in the afternoon. The afternoon patrol should generally be completed at the end of the day to observe that all solid waste is stored within the building and that bird control measures are being effectively employed. Other patrols should be performed, as necessary, to deter birds from the site. The Bird Control Officer will complete a form documenting observations made on the patrol such as the number of birds noted, the methods used to deter the birds, such as number of projectiles fired, and the response of the birds to the dispersal technique. Improvements to the Habitat Management program or the need for exclusion techniques should be identified during the patrols. The daily patrol records will be maintained at the Facility to document the day-to-day bird control efforts.

2.3.3 Gull Distress Tapes and Scarecrows

In addition to the use of projectiles, recordings of distressed gulls may be used at the site. These can be played from time to time and used in conjunction with shotcrackers and a scarecrow of a dead gull placed in areas where they are visible to birds attempting to land. As with other methods, the tapes should not be played continually and the scarecrows should be moved frequently to maintain their effectiveness.

SECTION 3

PERSONNEL AND RESPONSIBILITIES

3.1 GENERAL

Implementation of this plan will involve a variety of personnel including the Site Supervisor, a Bird Control Officer and other members of the Facility staff. As needed, a consultant will be retained to conduct the monitoring to evaluate the effectiveness of the measures employed. In addition, all staff will be familiar with the goals and methods presented in this plan. Staff will be made aware that nothing but maximum effectiveness of the bird control measures is acceptable. Specific responsibilities of persons responsible for implementation of this Plan are described below.

3.2 MANAGER

The Manager has ultimate responsibility for implementation of the Plan. The Manager will meet with staff regularly, periodically review procedures, communicate regularly with employees and coordinate with consultants as required.

3.3 BIRD CONTROL OFFICER

The Bird Control Officer will be a designated staff member who will devote his/her time on an as-needed basis to bird control efforts. The Bird Control Officer, or a designated alternate, will be on-site at all times when the Facility is open. The Bird Control Officer should be reachable at all times by radio. Specific duties of the Bird Control Officer include:

- Assuring that equipment is in good working order and that adequate supplies are on-site;
- Recording data on bird control efforts and bird responses;
- Being responsible for the habitat management and bird dispersal methods being implemented; and.
- Communicating with the Site Supervisor and corporate engineering staff on a routine basis.

3.4 CONSULTANT

Should the need arise, an independent consultant, such as a wildlife biologist, will be retained. The Consultant will conduct a program of monitoring the number of birds seen in the vicinity of the transfer station. In addition, the Consultant will be responsible to:

- Provide advice to the Bird Control Officer regarding the implementation of this Plan;
- Evaluate the overall effectiveness of the bird control measures; and,
- Make recommendations to modify the Plan as necessary.

SECTION 4

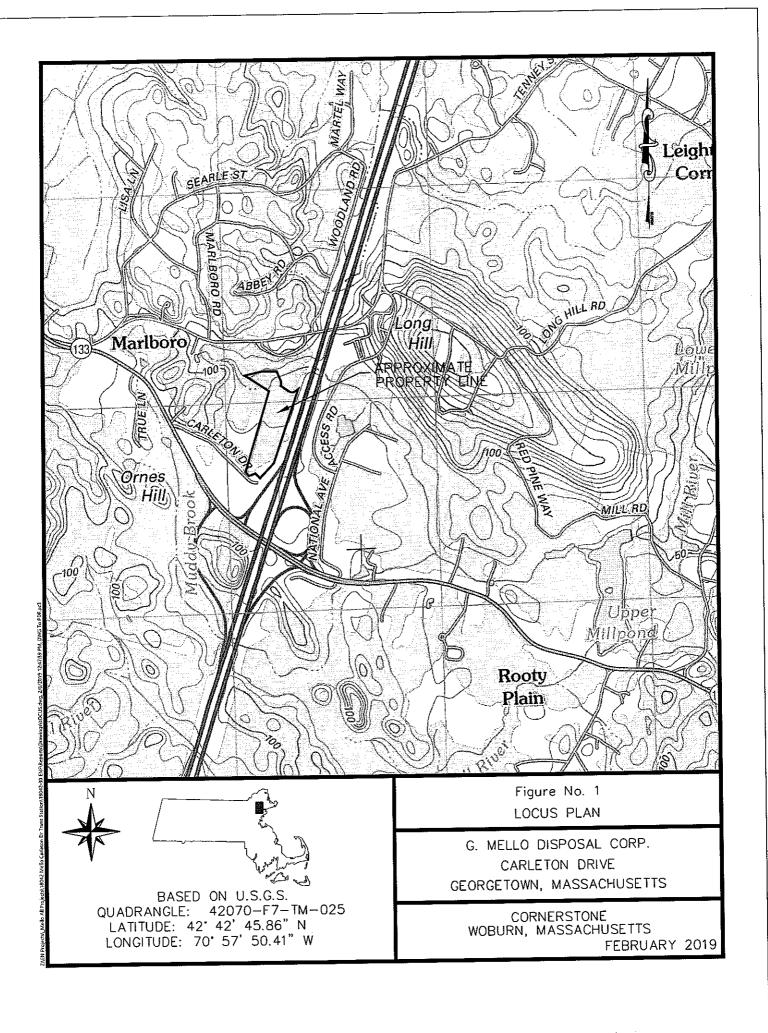
MONITORING AND REPORTING

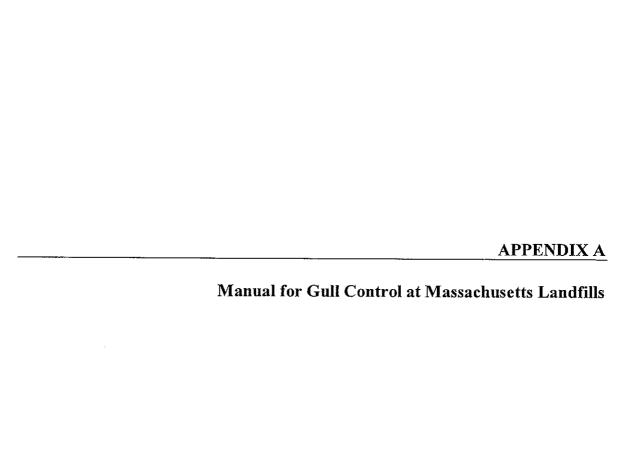
4.1 GENERAL

The Facility will implement a program of monitoring the numbers of birds that are observed at and in the vicinity of the transfer station. The monitoring program will be conducted under the direction of the Facility's Bird Control Officer. Monitoring efforts will document and record the following:

- Numbers and species of birds observed in the vicinity of adjacent properties;
- Presence of nesting colonies of gulls, if they occur; and,
- Quantitative observations of the potential hazard that gulls and other birds present to aircraft in the area.

Monitoring reports will include summaries of bird control activities carried out by the Bird Control Officer so that the effectiveness of control activities can be evaluated and related to numbers of birds observed at different times of the year. Monitoring data will be recorded on the form presented in Appendix B.





MANUAL FOR GULL CONTROL

AT

MASSACHUSETTS LANDFILLS

JOINTLY DEVELOPED BY:

Metropolitan District Commission,
Division of Watershed Management
Massachusetts Department of Environmental Protection,
Bureau of Waste Prevention
Massachusetts Division of Fisheries & Wildlife
USDA APHIS Wildlife Services

May 1998

MANUAL FOR GULL CONTROL AT MASSACHUSETTS LANDFILLS

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MANUAL FOR GULL CONTROL AT MASSACHUSETTS LANDFILLS

I. INTRODUCTION

In recent years, large numbers of gulls leave coastal zones and use inland portions of Massachusetts during fall and winter months. The combination of large inland water bodies for night roosting, plus abundant and concentrated food supplies at local landfills, have created very favorable conditions for the survival of these species.

The resulting high concentrations of gulls at inland sites have resulted in a number of public health, safety or nuisance problems. These include risks of bird strikes around airports, contamination of public water supplies and possible disease transmission. A wide variety of methods have been used in an attempt to control the impacts of gulls, and some efforts have successfully reduced localized problems. For example, gull harassment programs at several area landfills have reduced the threat of bird strikes at Westover Airbase in Chicopee; daily harassment efforts at Quabbin and Wachusett reservoirs have substantially reduced water quality problems associated with night roosting gulls.

However, the long-term solution to gull problems will require a coordinated effort on the part of various governmental agencies and private parties to control not only roosting behavior, but also gull access to major food supplies at landfills and other locations. Otherwise, individual gull control efforts will only have the effect of moving the gulls, and the problems, to other locations.

This manual discusses the problems associated with fall and winter concentrations of gulls in Massachusetts, and outlines a program and methods to control gull feeding at municipal solid waste landfills. Much of the information used in this manual came from the scientific literature, the experiences and observations of staff from the Metropolitan District Commission/Division of Watershed Management (MDC/DWM), the Massachusetts Division of Fisheries & Wildlife (MDFW), and the USDA/APHIS/Wildlife Services office in Amherst. Additional information was taken from a Fugro-McClelland report prepared for Resource Control, Inc. (Fugro-McClelland (East). 1993 (draft). "An Appraisal of Potential Gull Problems Associated with a Proposed Landfill in Clinton, Massachusetts And Practical Solutions"). Paul Lyons (MDC) was the primary author of this manual. In addition, Paul Emond (DEP), Brad Blodget (MDFW), Laura Henze (USDA APHIS), John Scannell (MDC), Pat Austin (MDC) and Dan Clark (MDC) played significant roles in its development.

II. BACKGROUND

A. Gull Species of Concern

Two species of gulls are typically associated with landfills and water supply reservoirs in this region: Herring Gulls (*Larus argentatus*) and Great Black-backed Gulls (*Larus marinus*). Ringbilled Gulls (*Larus delawarensis*) also use landfills, but not to the extent that the other two species do. The herring gull is the common gull of the Northeast - a large bird with a white head and underparts, and gray wings with black tips when in adult plumage. Herring gull young of the year have a generally brown appearance, acquiring progressively more white plumage with each successive molt as they mature.

Herring gulls breed in the northern latitudes of both the New and Old Worlds. In New England, breeding colonies are found from Maine to Connecticut. Herring gulls nest almost exclusively on coastal islands. The only known inland colony of herring gulls in Massachusetts was located on an island in the Wachusett Reservoir in central Massachusetts. The herring gull is migratory and nests from April through September. The main food items of herring gulls have been reported as garbage, sewage, fishery wastes and various mussels and crabs.

Great black-backed gulls have a similar natural history to herring gulls, and are also similar in appearance, except for their larger size and the characteristic black back in adults. Relatively uncommon in Massachusetts until the 1960's, the black-back population has increased dramatically in the past few decades. Although they tend to be less associated with human activities than herring gulls, black-backs are still commonly observed at landfills and readily intermix with herring gulls.

Ring-billed gulls look similar to herring gulls, but are smaller with yellowish rather than pinkish feet and a black stripe around the bill. These gulls are found more extensively in the interior United States than in New England. Although they are sometimes observed at landfills, ring-billed gulls are more frequently found at shopping malls, near fast-food restaurants, or feeding on worms and insects in open fields or agricultural areas.

Gulls have caused or exacerbated a number of different ecological problems, which seem to stem primarily from the tremendous recovery and expansion of the gull population in this century. This has been a world-wide phenomenon, which began in the late 19th century after the gull populations had been decimated by those who took the eggs and chicks for consumption, and killed adults for their plumage. Bird protection laws were passed, and between 1900 and 1960, herring gulls expanded from a few birds nesting in Maine to thousands nesting as far south as North Carolina. At the present time, herring gull and ring-billed gull populations appear to have stabilized, or are declining, but great black-backed gull populations continue to increase and expand their range.

B. Gulls and Water Supplies

Gull roosting and loafing on water supply reservoirs can lead to contamination of those water supplies, and such problems have been experienced by water supply managers in various parts of the state. These impacts can be particularly problematic at smaller reservoirs that do not have the dilution potential to deal with the contamination associated with hundreds or thousands of roosting gulls, which often use these smaller reservoirs as loafing areas during daylight hours. Larger reservoirs in Massachusetts (e.g., Quabbin and Wachusett) are also affected however, since these water bodies (along with the Connecticut River) appear to be the primary night roost locations for gulls in the state.

With new federal and state drinking water regulations currently in effect, increased concern and attention have been focused on gull impacts and control in recent years. These efforts have mainly involved gull harassment, with the goal of eliminating gulls altogether from smaller water bodies, or moving the roosting birds far enough away from water intakes to allow natural settling and dilution of the contaminants on larger reservoirs. On Quabbin and Wachusett reservoirs, intensive gull control efforts have been underway for several years, and have produced very positive results.

The most common problem associated with gull roosting on water supply reservoirs has been contamination with fecal bacteria. However, another concern is the transmission of human pathogens such as *Salmonella*, which gulls have been known to carry. Further, gulls may also serve as mechanical vectors of disease organisms that are picked up on their feet and/or feathers at landfills or sewage treatment plants. Even in the absence of such disease transmission however, fecal coliform contamination alone can render reservoir water legally unfit to drink and mandate costly water treatment measures.

The greatest use of inland reservoirs by gulls generally occurs in fall and winter with populations increasing steadily from the end of the breeding season through ice-up. However, midwinter use is highly variable; inclement weather generally increases gull use of inland reservoirs, and ice-up restricts their use. In Massachusetts, the Quabbin and Wachusett reservoirs, along with the Connecticut River, represent the largest inland fresh water sources, and all three are used by roosting gulls.

Diurnal activity patterns of gulls using night roost reservoirs are regular and predictable. Most birds leave the reservoirs shortly after dawn and disperse widely in search of food. Landfills, shopping centers, fish processing plants, and sewage outfalls are primary feeding areas. Although not well-documented, it is likely that gulls will travel up to 50 miles from roosting sites to some food sources.

During the day, gulls use various sites as "loafing areas" when they are not feeding. These areas often include roofs of buildings, watertowers, open fields, ponds, lakes and reservoirs, usually in close proximity to feeding areas. For water supply managers with reservoirs close to landfills, this behavior can be of particular concern, since the gulls generally spend most of the day at the reservoir - loafing, washing and defecating - leaving only occasionally and for relatively short periods of time to feed at the landfill.

In general, few gulls remain on roosting reservoirs during the day, unless landfills are operating in close proximity. When flying to and from the reservoirs, the gulls use established flight paths, which generally correspond to the most direct routes to local landfills. Upon returning to the reservoirs, small groups often land in staging areas and then coalesce into a single larger flock in the main roosting area at dusk. The roosting areas are in the same general location of the reservoir on most nights.

C. Gulls and Landfills

Gulls are attracted to landfills and other refuse disposal sites due to the abundance of edible waste they supply. In fact, many authors attribute the dramatic worldwide increase in gulls - and in particular herring gulls, great black-backed gulls, and ring-billed gulls in North America - to the abundant year round supply of high quality food which became available at landfills during the past century.

Once they arrive at a landfill (usually close to daybreak), gulls may land nearby, or continue to soar above the site as high as 3000 feet. This behavior creates additional concerns when airfields are located nearby. Accordingly, many commercial and military airports conduct active gull harassment or control to minimize risks of bird strikes with their planes.

Although they usually spend most of the daylight hours in the vicinity of landfills or other feeding areas, gulls may spend relatively little time actually feeding. When pressed, gulls can consume their whole daily food intake in only 15 minutes. This is a very important factor to consider when planning gull control activities - i.e., there can be no lapses in the harassment program that would allow the gulls to feed even for a short time.

The number of gulls utilizing a given landfill depends on a number of factors including the weather, season, landfill size, location and management (including gull harassment) practices, and type of refuse present. Gull use is generally highest from September to March, during the period not devoted to nesting. However, within these general trends, daily gull use is still highly variable.

III. OVERVIEW OF GULL CONTROL METHODS

Gull control methods can be categorized into one of two groups: 1) direct or active methods, which either decrease the population through the destruction of eggs or killing of birds, or which actively disperse birds from an area; and 2) indirect or passive methods which alter habitat to make it less attractive to the birds.

Population reduction methods are usually impractical at landfills or roosting sites, due to the inherent difficulty in killing enough birds to substantially reduce their numbers. This method has been used successfully at nesting sites however, where the gulls' strong attachment to the nest helps overcome their otherwise wary nature.

Numerous methods have been developed to harass or disperse gulls from areas where they are not wanted. These include human presence, pyrotechnics, recorded distress calls, propane cannons, visual frightening devices, and trained dogs. In general, methods utilizing human presence tend to be more effective but also more expensive.

Mechanical or stationary devices may work initially, but they generally lose effectiveness as the birds become accustomed to their presence and/or operation. The use of trained dogs has been very effective in reducing Canada goose numbers at golf courses and other problem areas, and may hold some promise for some landfill operations.

Indirect/passive methods (habitat management) are aimed at eliminating or making unavailable one or more of the five basic gull survival requirements: nesting areas, secure night-time roosting areas, feeding areas, loafing areas, and drinking water sources.

Nesting areas and night-time roosts are seldom if ever present at landfills. Access to feeding areas may be controlled by minimizing the area of the active cell surface area, covering the landfill food source, and denying access to the working face by overhead lines or other methods. Night time dumping is another option, since gulls do not feed at night. Loafing areas may be eliminated by

removing surface waters at landfills. Seeding, planting or letting all grassy areas grow may also help since gulls avoid tall grass or shrubby areas that prevent them from seeing their surroundings.

Gulls are wary and adaptable animals, and an effective control program generally needs to be both varied and unpredictable. Thus, a combination of options is often used, along with a degree of irregularity in when, where and how they're applied.

IV. GULL CONTROL PROGRAM FOR LANDFILLS

A. General

This section provides a blueprint for implementing an effective gull control program at landfills. However, inherent in this proposal is the recognition that gull problems are regional concerns, not local ones, and that gull control operations at an individual landfill must be part of a larger regional effort to be truly successful. Thus, a concerted and coordinated effort by various state, federal and private agencies and parties is needed.

The goal of this coordinated effort should be to disrupt the daily patterns of gull feeding and roosting so as to bring about a major change in their behavior patterns in the region. On an individual landfill level, this will require that gulls are completely prevented from feeding at that site. It's crucial to understand that nothing but 100% effectiveness is acceptable. If gulls are precluded from feeding for most of the day, except during a brief period during the machine operator's lunch break or for 20 minutes after the landfill closes, then the whole effort was for naught. Remember, when pressured, gulls can meet their total daily food intake requirements in less than 15 minutes, even though they may spend the whole day at or near the landfill.

It's also important to understand that intensive gull control may only be necessary for a short time period, just until the birds get the message that they cannot feed at that site. Experiences at other landfills suggest that this learning occurs in as little as two days. Thus, although continued vigilance and control measures are still periodically needed afterwards, the intensive gull control period may be very short. Again, this all hinges on the initial effort being close to 100% effective.

B. Program Components

Effective gull control programs usually employ a variety of methods to prevent acclimation by the birds. Thus, the following techniques should be viewed as a "pool" of potential options for dealing with gulls. At any one time, only one or a couple of the harassment methods might be needed, although the others should be readily available if and when needed.

In general, a landfill gull control program should include: 1) habitat alterations (indirect methods) to make the area less desirable to gulls; 2) a variety of harassment and lethal control methods (direct methods) designed to make it unsafe or undesirable for gulls to feed at the site; and 3) accurate monitoring and record-keeping of control measures used and gull responses. Each of these components will be discussed further in the following sections. Local animal damage control professionals (see resource list at the end of this manual) can assist landfill operators in selecting the methods that best fit the specific characteristics of a site. In addition, proper permits should be obtained so that the landfill operators can legally implement the full range of gull control options.

1. Habitat Alteration

As described earlier, habitat alteration involves eliminating or restricting access to any of the basic survival requirements of gulls. At landfills, this can often be accomplished by minimizing the surface area of the active landfill face, providing good daily coverage of refuse, managing nearby vegetation, eliminating local surface water sources. In some cases, it may be necessary to restrict access to refuse with overhead wires or other physical barriers.

- a) Minimize Surface Area of Active Face The landfill should be designed and operated so as to minimize the surface area where refuse is deposited. This will decrease the site's attractiveness to gulls, and facilitate the spatial concentration of active gull control efforts, making them easier to perform and more cost-effective.
- b) Daily Coverage Conventionally, landfill coverage is accomplished with soil materials. State regulations mandate complete coverage of the refuse at least once per day (at the end of the day), and when soil materials are used, the coverage must be at least six inches deep. Regular coverage of refuse throughout the day is desirable since it minimizes the availability of food for the gulls. In most cases, good coverage of refuse is the only means of preventing gull feeding during times when the landfill is closed. In practice however, complete coverage of refuse is difficult to achieve, although it should still be a goal of landfill operations. In situations where it is determined that conventional coverage methods are not preventing gulls from gaining access to refuse after hours, alternative coverage methods (e.g., tightly-woven plastic mesh) that can be pulled or rolled out over the active cell should be considered.
- c) Vegetation Management Gulls prefer, and are attracted to large open areas that are either devoid of vegetation (e.g., paved areas, gravel areas, exposed soil areas, open water areas), or have closely mown vegetation (lawns, agricultural fields). These areas provide ideal gull loafing habitat, and any that exist on the site should be eliminated or minimized. Grassy areas should not be mowed. All areas of exposed soil (except active cells, roads, and other necessary openings) on the landfill property which are presently devoid of vegetation (less than 25 percent plant cover) should be hydro-seeded or cultivated with an appropriate mixture of seed, fertilizer and mulch. The particular species of plant is not important, however, it should be a fast-growing species which grows rank (dense) and tall (>10 in.), grows on sterile soils with little cultivation, and has stout stems that resist lodging (laying down under rain, snow, wind). Cinquefoil (Potentilla spp.) has been suggested in the literature as suitable, however, quackgrass (Agropyron repens), reed canary grass (Phalaris arundinacea), or other species recommended by the Natural Resource Conservation Service for this purpose and in these soils can be used. The resultant vegetation should be allowed to grow, and be maintained at a height of at least ten inches where possible. The goal is to have the site's vegetation tall and dense. One cutting per year will usually be adequate to prevent the growth of woody vegetation. This cutting should be done in late April or early May (i.e., prior to grassland bird nesting seasons) so that the vegetation is rank and at least ten inches tall for the fall and winter months.

As the landfill operations progress, all areas that are recently filled and covered, and expected to remain inactive for a least one month, should be planted and

treated as described above. Efforts should be made to maintain as much of the landfill property as possible with vegetation at least ten inches tall and preferably twenty or more inches.

- d) Surface Water Elimination Every attempt should be made to avoid, minimize and/or eliminate non-jurisdictional and non-required surface waters on the landfill site, including ponds, borrow pits and puddle areas. Most such surface waters are attractive to gulls as drinking and loafing sites. Grading activities conducted during landfill operations should be done in a manner to avoid the creation of surface water bodies.
- e) Physical Barriers Several means of physically excluding gulls from refuse areas have been used, including wire grids and metal buildings constructed over the dumping area. These tend to be expensive and/or labor intensive however. Wire grids, consisting of a single series of parallel lines, but more commonly two series of parallel lines erected at right angles to each other to form a mesh or grid pattern, can be erected above the active cell of the landfill. This method has been effectively used to exclude larger gull species from landfills, reservoirs and fish hatcheries. Grid spacing of 20 feet or less is generally effective on the three problem gull species found in this region. Either monofilament plastic line, or stainless steel wires can be used.

2. Harassment Methods

The above habitat modification methods can substantially reduce the attractiveness of a landfill to gulls. However, since the primary value of most landfills to gulls is as a food supply, it is likely that some gulls will still be present, even after habitat modification methods have been employed. The combination of habitat modification with active and diligent harassment of gulls can effectively eliminate gulls from landfills however. Following are some of the more effective harassment methods.

- a) Human Presence Although various artificial or mechanical methods have been developed to influence gull behavior, the tendency for gulls to acclimate to them precludes their use as the main means of landfill gull control. Thus, human presence, at least on a periodic basis, is very important in this program. Once a control program is underway, human presence alone is often enough to move gulls from an area. When combined with other methods, such as pyrotechnics, human presence is even more effective. The goal of this phase of the program is for the gulls to associate the sight of landfill staff with danger. To achieve this, it's important to make each encounter with landfill staff unpleasant, or better yet dangerous, for the gulls. This can be accomplished with the use of pyrotechnics, firearms, or other methods described below.
- b) Pyrotechnics A mainstay of most gull harassment programs is some form of pyrotechnic use. Shellcrackers, "screamers" and "bangers" are most commonly used. These devices are essentially fire-crackers that are projected into the middle of a flock of gulls. Shell crackers are fired from 12 gauge shotguns, which for safety purposes should be single-barreled, breech-loading guns with an open choke (modified or improved cylinder). Screamers and bangers are smaller diameter projectiles which are fired from commercially available .22 caliber starter or blank

pistols. It has been found that screamers are particularly effective on gulls. Judicious and varied use of several different kinds of pyrotechnics is important, to prevent acclimation by the gulls. A list of suppliers of pyrotechnic devices appears at the end of this document. [Note that the use of certain pyrotechnic devices in Massachusetts requires the possession of a Firearms Identification (FID) Card or a License to Carry Firearms.]

In most situations, the combination of human presence and pyrotechnics will be enough to prevent gulls from landing and feeding. These two methods should form the foundation of the gull harassment program. However, various other methods are also available to supplement these methods.

- c) Gull Distress Calls Cassette tapes of recorded gull distress calls are sometimes used to elicit a sense of alarm or a flight response in gulls. The effectiveness of distress or alarm calls can be further enhanced by displaying a dead or decoy gull in a dying or distressed posture while playing the tape. Reactions to distress calls tend to be species-specific (i.e., to elicit the desired response in herring gulls, you need to use herring gull distress calls, etc.), and sometimes result in curiosity instead of flight responses in the target birds. In the latter case, shellcrackers or screamers can be used to achieve the desired effect.
- d) Propane Cannons These devices, which produce loud explosions at regular, pre-set intervals are often used in bird control, although their regularity often leads to acclimation, and thus reduced effectiveness. Again, they can be useful in combination with other methods.
- e) Visual Frightening Devices These objects, including balloons with painted "eyes", flags and human or raptor effigies, are meant to provide gull control during times of no human presence. They may be effective in some situations, but seldom when used alone.
- f) Trained Dogs While no information was found in the literature on the use of trained dogs to deter gull use of landfills, the technique still holds promise. Dogs have been used on occasion to scare problem birds from agricultural areas and airfields, and are currently used at a number of golf courses and corporate headquarters for controlling Canada geese. While still unproven as a control method for gulls at landfills, this method could prove to be very effective and inexpensive, and is worth pursuing if opportunities present themselves.

3. Lethal Methods

It is occasionally necessary to reinforce harassment with the actual killing or poisoning of one or more birds. Such activities do require a federal depredation permit, co-signed by the state Division of Fisheries & Wildlife. Depredation permits are issued by the U.S. Fish & Wildlife Service (USFWS); applications are available from the USDA Wildlife Services office (413 253-2403) or the USFWS Hadley office (413 253-8643).

Permit applications should be submitted well in advance of the anticipated start date of the gull control program. Two to three months lead time should be adequate.

- a) Shooting While pyrotechnics are often effective in dispersing gulls, the birds sometimes acclimate to their use if no harm ever befalls them. Thus, it is sometimes necessary to supplement or reinforce pyrotechnic use with live shells that kill one or more gulls. For maximum effect and impact, shooting should be done when and where other gulls can witness the action. Considerable care should obviously be taken to avoid shooting of non-target species, and in residential areas. To avoid such problems, lethal methods should only be considered or used when other methods are becoming ineffective.
- b) Toxicants Aversive conditioning of gulls has sometimes been achieved with the use of chemical frightening agents such as Avitrol. In Massachusetts, this is the only toxicant registered by both the USEPA and the Massachusetts Pesticide Bureau for use at landfills. When applied correctly, only a small percentage of the target population is affected (usually less than 1%), but the rest of the birds are frightened away from the site. The chemical is completely metabolized in the birds that ingest it, thus there is no risk of secondary poisoning of nontarget species. Where gull activity is heavy, Avitrol may have to be re-applied several times a year to maintain adequate control. As with other bird control methods, Avitrol is most effective when used as part of an integrated program with other bird control methods. Avitrol is a restricted-use pesticide and may only be applied by licensed applicators. Both state and federal wildlife control permits are required. Further, since some members of the public may be opposed to the use of toxicants, discretion should be used with this product.

C. Program Monitoring and Modification

A monitoring program is essential for documenting the effectiveness of the gull control program, as well as for determining if and when modifications in the program are needed. Further, some record-keeping is required as a condition of the issuance of depredation permits. At a minimum, daily records should be kept on gull numbers, harassment activities (methods used, number of shots fired, etc.), responses of gulls to control activities, and number of gulls shot. Field data forms (an example of one is attached) should be used for recording this information, and completed forms should be collected and filed on a daily basis. Such records represent very important information that allows for continuous evaluation of the effectiveness of various control methods, as well as the overall success of the gull control program.

V. SUMMARY

Inland concentration of herring, great black-backed and ring-billed gulls in Massachusetts constitutes a serious threat to drinking water supplies, air traffic safety, and public health and welfare in general. Effective control of gulls requires a concerted effort on the part of state and federal agencies, water supply managers and landfill owners and operators.

Control of gulls at landfills should involve a combination of habitat modification and active harassment, with the goal of achieving 100% effectiveness in preventing gull feeding and loafing on site. Specific gull control programs should be developed for each landfill operation, and be geared specifically to the particular situation and layout of that landfill. Assistance in developing these plans is readily available through several state and/or federal agencies. All landfill staff should be

familiar with the goals and methods of the plan, which should include both habitat modification and active harassment techniques.

Habitat modification options include minimizing the surface area of the active landfill face, complete daily coverage of refuse, managing vegetation to create an inhospitable environment for gulls, eliminating water sources, and using physical barriers such as overhead wires to restrict gull access to food supplies. Harassment methods include human presence, use of pyrotechnics, gull distress call tapes, propane cannons, visual frightening devices and trained dogs. Lethal measures such as shooting or toxicants may occasionally be needed to reinforce harassment methods

Habitat modification works in conjunction with harassment techniques, and is intended to make the general area less attractive to gulls. Eliminating large open areas with no or low vegetation, along with good coverage of refuse and eliminating on-site water sources should accomplish this.

Gulls are very adaptable, and can acclimate quickly to any harassment method that poses no obvious threat of physical harm to them. Thus, it's important that gull control programs use a variety of methods and have the ability to switch quickly among them. In general, a diligent human presence, combined with the use of several pyrotechnic options and an occasional reinforcement with lethal methods (such as shooting) should be very effective. The use of trained dogs also holds potential.

In many cases, dramatic changes in gull behavior patterns can be brought about in only a few days if the harassment effort is diligent. In such cases, the gulls often leave the area altogether, at least temporarily, thus greatly reducing the amount of effort needed on subsequent days. However, as long as putrescible waste is available at the landfill, gulls will periodically visit the site and attempt to feed; thus, constant vigilance is required indefinitely to assure long-term success.

It is important that the gull control program remain adaptable and responsive to changes in gull populations, landfill operations, and concerns of the public and public agencies. This requires good record-keeping and communication. A close working relationship and open dialogue should be maintained with DEP, USDA APHIS Wildlife Services program and the MDFW. Private consultants are also available to train personnel, implement control programs, and/or conduct monitoring. MDC Division of Watershed Management staff are also available to share their knowledge and experiences with landfill gull control. These agencies, companies and individuals represent a wealth of information and experience on gull control methods and programs, and are ready and willing to consult with landfill operators on the development of effective programs.

RESOURCE LIST

I. TECHNICAL ASSISTANCE

Assistance with setting up and conducting gull control programs is available through several sources. For assistance with:

...control techniques, sources of supplies, permit applications, contact:

USDA APHIS Wildlife Services office 463 West Street Amherst, MA 01002 (413) 253-2403

(contacts: Laura Henze; Jennifer Lynch; Don Wilda)

...gull behavior, control program design, contact:

Brad Blodget, State Ornithologist Massachusetts Division of Fisheries & Wildlife One Rabbit Hill Rd. Westboro, MA 01081 (508) 792-7270

In addition, staff from the Metropolitan District Commission, Division of Watershed Management have been conducting gull control operations at MDC reservoirs and local landfills for several years. The following people can provide information and suggestions based on those experiences:

Dan Clark	John Scannell	Paul Lyons
Wildlife Biologist	Environmental Engineer	Wildlife Biologist
(508) 792-7423 ext. 215	(508) 365-5292	(413) 323-8998

II. EQUIPMENT SUPPLIERS

A. Pyrotechnic devices:

The Bullseye Gunshop 1081 Huntindon Ave. Waterbury, CT 06704 (203) 755-1055 Colonial Fireworks 5956 Ivanhoe Ipsilanti, MI 48197 (313) 482-3272

Pyrotechnic devices (cont.)

Margo Supplies Ltd. Site 20, Box 11, RR #6 Calgary, Alberta, Canada

T2M 4L5 (403) 285-9731

O.C. Ag. Supply 1328 Allec St. Anaheim, CA 92805 (714) 991-0960

Stoneco Inc. P.O. Box 187 Dacono, CO 80514 (303) 833-2376

Wald & Co. 208 Broadway Kansas City, MO 64105 (816) 842-9299 [rope firecrackers]

JPF Distributors 9 Union Square - Suite 184 Southbury, CT 06488 1-800-582-8843 New Jersey Fireworks Co. Box 118 Vineland NJ 08360 (609) 692-8030

Reed-Joseph Internat'l Co. P.O. Box 894

Greenville, MS 38702 (800) 647-5554

[rope firecräckers]

[carry bombs, screamers, bangers]

Sutton Ag Ent. 1081 Harkins Rd. Salinas CA 93901 (408) 422-9693

[shellcrackers, whistlers]

Western Fireworks Co, 2542 SE 13th Ave. Canby, OR 97013 (503) 266-7770

TAPCO Inc. P.O. Box 818 Smyrna, GA 30081

(800) 359-6195

[12-gauge bombs, mini-grenades]

B. Visual Bird Repellents:

The Huge Co. 7625 Page Blvd. St. Louis, MO 63133 (800) 325-3371

Pete Konzak Box 20 Minnewaukan, ND 58351

(701)473-5646 [jump-up scarecrow] Kite City 1201 Front St.

Old Sacramento, CA 95814

[hawk kite]

Mellingers

2310 W. South Range Rd. N. Lima, OH 44452 (800) 321-7444 [scarecrow]

Visual Bird Repellents (con't)

Orchard Equipt. & Supply P.O. Box 540 Conway, MA 01341 (413) 369-4335

[balloons, flash tape]

Sutton Ag. Ent. 746 Vertin Ave. Salinas, CA 93901 (408) 422-9693 [kites]

Tri Lite Inc.

1335 West Randolph Chicago, IL 60610 (312) 226-7778 [flashing lights] Wildlife Mngmnt. Supplies

640 Starkweather Plymouth, MI 48170 (800) 451-6544

[balloons]

C. Electronic or Recorded Sound Repellents:

Weitech, Inc.

P.O. Box 1659 310 Barclay Way Sisters, OR 97759 (800) 343-2659 Bird Busters

1083 Thomas Jefferson St., N.W.

Washington, D.C. 20007

(800) NO-BIRDS

Johny Stewart Box 7594 Waco, TX 76710

Waco, TX 76710 (800) 537-0652

Sutton Ag. Enterprises, Inc.

746 Vertin Ave. Salinas, CA 93901 (408) 422-9693

Reed-Joseph Internat'l

232 Main Street

P.O. Box 894 Greenville, MS 38702 (800) 647-5554 Signal Education Aids

2314 Broadway

Denyer, CO 80205 (303) 295-0479

Wildlife Control Margo Supplies Ltd. Site 20, Box 11 RR #6 Calgary, Alberta, Canada T2M 4L5 (403) 285-9731

III. SAMPLE FIELD DATA FORM

The form on the following page can be used to record daily gull observations, and to document the use and effectiveness of gull control activities.

gulmafnl.598

FIELD DATA FORM - GULL CONTROL PROGRAM

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Bird Control Summary Log

BIRD CONTROL SUMMARY LOG G. Mello Disposal Corporation Carleton Drive Georgetown, Massachusetts

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Emergency Response Plan

PROPOSED EMERGENCY RESPONSE PLAN PROPOSED G. MELLO DISPOSAL CORP. TRANSFER STATION FACILITY CARLETON DRIVE GEORGETOWN, MASSACHUSETTS

Prepared for:

G. Mello Disposal Corp. 95 Tenney Street Georgetown, Massachusetts 01833

Prepared by:



9F Presidential Way Woburn, MA 01801

February 6, 2019

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SECTION 1

INTRODUCTION

1.1 PURPOSE

The purpose of this Emergency Response Plan (ERP) is to describe measures to be implemented at the G. Mello Disposal Corp. Transfer Station to prevent oil or hazardous material discharges from occurring, and to prepare G. Mello Disposal Corp. to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge. This ERP Plan is used as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

SECTION 2

GENERAL FACILITY INFORMATION

2.1 FACILITY DESCRIPTION (40 CFR 112.7(A)(3))

Name: G. Mello Disposal Corp. Proposed Transfer Station Expansion

Georgetown, Massachusetts 01833

Carleton Drive

Type: Solid Waste Transfer Station

Owner/Operator: G. Mello Disposal Corp.

> 95 Tenney Street Georgetown, Massachusetts 01833

978-352-8581

Primary contact: Jason Mello, General Manager

978-352-8581

2.1.1 Location and Activities

Address:

The project site is located in the southeastern portion of the Town. The site is depicted as Lot No. 46 on the Town of Georgetown Assessor's Map No. 15. The owner of record is the East West Realty Trust, 6 Norino Way, Georgetown, MA 01833. The site consists of a parcel of land totaling approximately 14.6 acres of land consisting of previously disturbed areas, by undeveloped woodland areas and wetlands. The site is generally bound northerly by residential properties, easterly by Interstate 95, westerly a commercial and industrial property and southerly by Carleton Drive. Figure No. 1, Locus Plan, presents the location of the Facility within the Town.

SECTION 3

DISCHARGE RESPONSE

The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by State and possibly federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

- Eliminate potential spark sources;
- If possible and safe to do so, identify and shut down source of the discharge to stop the flow;
- Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
- Plug drain pipes downgradient from the spill to contain spilled material;
- Contact the Facility Response Coordinator or his alternate;
- · Contact regulatory authorities and the response organization; and,
- Collect and dispose of recovered products according to regulation.

For the purpose of establishing appropriate response procedures, this ERP Plan classifies discharges as either "minor" or "major," depending on the volume and characteristics of the material released. Table No. 1 presents a list of Emergency Contacts. The list should be posted at prominent locations throughout the Facility.

If material is released outside the containment areas, it is critical that the material is accurately identified and appropriate control measures are taken in the safest possible manner. Consult the MSDSs file in the Facility office.

TABLE No. 1: Emergency Contacts

Designated person responsible for emergency response activities:

Facility Response Coordinator – Jason Mello, General Manager 978-352-8581

EMERGENCY TELEPHONE NUMBERS:

Town of Georgetown Fire Department 978-352-5757 or 911

Town of Georgetown Highway Department 978-352-5704 or 911

Town of Georgetown Water & Sewer Department 978-352-5750 or 911

Massachusetts State Police (Station A-2, SP Newbury) 978-462-7478

MassDEP Emergency Response Center 888-304-1133

MassDEP Oil Remediation and Compliance Bureau 888-304-1133

National Response Center (U.S. Coast Guard) 800-424-8802

MassDEP 617-292-5500

USEPA, Region 1 617-223-7265

Local Hospital:

Anna Jaques Hospital, 25 Highland Avenue Newburyport, MA 01950 978.465.4427 or **911**

Poison Control Center 800.682.9211

Emergency Response Contractor:

CYN Environmental Services, Inc. 800-242-5818
CHEMTREC Emergency 800-262-8200
New England Disposal Technologies, Inc. 800-698-1865

3.1 RESPONSE TO A MINOR DISCHARGE

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- The quantity of product discharged is small (e.g., may involve less than 10 gallons of oil or gasoline);
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source;
- Discharged material is not likely to reach water;
- There is little risk to human health or safety; and,
- There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by G. Mello Disposal Corp. personnel. The following guidelines apply:

- Immediately notify the Facility Response Coordinator;
- Under the direction of the Facility Response Coordinator, contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers:
- Inspect stormwater management system catch basins, manholes and Stormceptor units to insure they are free of debris and/or contaminants;
- Cleaning of the Stormceptor units shall be completed in accordance with the manufacturer's recommendations. Refer to Owner's Manual presented in the Inspection and Maintenance Plan;
- The Facility Response Coordinator will complete the Discharge Notification Form presented in Appendix A; and,
- If the discharge involves more than 10 gallons of gasoline or diesel fuel, the Facility Response Coordinator will notify the MassDEP Emergency Response Center at 888.304.1133.

3.2 RESPONSE TO A MAJOR DISCHARGE

A "major" discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- · The discharged material enters water;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or,
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

- All workers must immediately evacuate the discharge site via the designated exit routes and move
 to the designated staging areas at a safe distance from the discharge. Exit routes are included on
 the facility diagram and posted in the maintenance building, in the office building, and on the
 outside wall of the outside shed that contains the spill response equipment;
- If the Facility Response Coordinator is not present at the facility, the senior on- site person notifies the Facility Response Coordinator of the discharge and has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge. If a discharge reaches a sanitary sewer, the publicly owned treatment works (POTW) will be notified immediately.

- The Facility Response Coordinator (or senior on-site person) must call for medical assistance if workers are injured;
- The Facility Response Coordinator (or senior on-site person) must notify the Fire Department or Police Department;
- The Facility Response Coordinator (or senior on-site person) must call the spill response and cleanup contractors listed in the Emergency Contacts list presented at the front of this Plan:
- The Facility Response Coordinator (or senior on-site person) must immediately contact the MassDEP Emergency Response Center (888.304.1133) and the National Response Center (888-424-8802);
- The Facility Response Coordinator (or senior on-site person) must record the call on the Discharge Notification Form in Appendix A;
- The Facility Response Coordinator (or senior on-site person) coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary; and
- The Facility Response Coordinator (or senior onsite person) shall inspect all components of the stormwater management system including manholes, catchbasins and Stormceptor units to insure that they are free of debris and contaminants and are functioning properly; and
- Cleaning of the Stormceptor units shall be performed in accordance with the manufacturer's recommendations. Refer to the Owner's Manual presented in the Inspection and Maintenance Plan.

If the Facility Response Coordinator is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

3.3 WASTE DISPOSAL

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The Facility Response Coordinator will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler within two weeks. Wastes resulting from a major discharge response will be removed and disposed of by a cleanup contractor.

3.4 <u>DISCHARGE NOTIFICATION</u>

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24-hours a day.

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Location of the incident:
- Source and cause of the release or discharge;
- Types of material(s) released or discharged;
- · Quantity of materials released or discharged;
- Danger or threat posed by the release or discharge:
- Number and types of injuries (if any);
- Media affected or threatened by the discharge (i.e., water, land, air);
- · Weather conditions at the incident location; and,
- Any other information that may help emergency personnel respond to the incident.

Contact information for reporting a discharge to the appropriate authorities is listed on the Emergency Contacts sheet at the front of this Plan and is also posted in prominent locations throughout the facility.

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to the EPA Regional Administrator and the appropriate State agency in charge of oil pollution control activities whenever the facility discharges (as defined in 40 CFR 112.1(b)) more than 1,000 gallons of oil in a single event, or discharges (as defined in 40 CFR 112.1(b)) more than 42 gallons of oil in each of two discharge incidents within a 12-month period. The following information must be submitted to the EPA Regional Administrator and to MassDEP within 60 days:

- · Name of the facility;
- Name of the owner/operator;
- · Location of the facility;
- · Maximum storage or handling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- · Additional preventive measures taken or contemplated to minimize possibility of recurrence, and,
- Other pertinent information requested by the Regional Administrator.

An Agency Notification Standard Report Form and Discharge Notification Form for submitting discharge information to the EPA Regional Administrator and to MassDEP is attached.

3.5 <u>CLEANUP CONTRACTORS AND EQUIPMENT SUPPLIERS</u>

Contact information for specialized spill response and cleanup contractors are provided in Table No. 1. These contractors have the necessary equipment to respond to a discharge of oil at Building Expansion.

APPENDIX A

Discharge Notification Form and Agency Notification Standard Report

Discharge Notification Form

Part A: Discharge Information	
General information when reporting a spill to outside author Name: G. Mello Disposal Corp. Transfer Station Facility Address: 46 Carleton Georgetown, MA 01833 Telephone: 978-352-8581 Owner/Operator: G. Mello Disposal Corp. 95 Tenney Street Primary Contact: Jason Mello, General Manager Work: 978-352-8581	
Type of oil:	Discharge Date and Time:
Quantity released:	Discovery Date and Time:
Quantity released to a water body:	Discharge Duration:
Location/Source:	
Affected media: air water soil storm water sewer/POTW	
dike/berm/oil-water separator other:	
Notification person:	Telephone contact: Business: 24-hr:
Nature of discharges, environmental/health effects, and damage	ges: Injuries, fatalities or evacuation required?

Part B: Notification Checklist	
Date and time Na	ame of person receiving call
Discharge in any amount	
Jason Mello, Facility Response Coord	linator/General Manager 978-352-8581
Discharge in amount exceeding 25 g	gallons
Local Fire Department 978-352-5757	or 911
MassDEP Hazardous Materials and W	/aste Spills 888-304-1133
Discharge in any amount and affect	ing (or threatening to affect) a water body
Local Fire Department 978-352-5757 Town of Georgetown Highway Depar Town of Georgetown Water & Sewer	tment 978-352-5704 or 911
MassDEP Hazardous Materials and W	Vaste Spills 888-304-1133
National Response Center 800-424-88	302
CYN Environmental Services, Inc.	800-242-5818
CHEMTREC Emergency New England Disposal Technologies,	800-262-8200 Inc. 800-698-1865

Agency Notification Standard Report

Information contained in this report, and any supporting documentation, must be submitted to the EPA Region 1 Regional Administrator, and to MassDEP, within 60 days of the qualifying discharge incident.

Facility:	G. Mello Disposal Corp. Transfer Station
Owner/operator:	G. Mello Disposal Corp. 95 Tenney Street Georgetown, MA 01833
Name of person filing report:	
Location:	46 Carleton Drive Georgetown, MA 01833
Maximum storage capacity:	
Daily throughput:	
Nature of qualifying incident(s):	
☐ Discharge to navigable waters or adjoining shorelin☐ Second discharge exceeding 42 gallons within a 12	e-month period.
Description of facility (attach maps, flow diagrams, an	d topographical maps):

Cause of the discharge(s), including a failure analysis of the system and subsystems in which the failure occurred:
Corrective actions and countermeasures taken, including a description of equipment repairs and
replacements:
Additional preventive measures taken or contemplated to minimize possibility of recurrence:
Other pertinent information
Const portunent million mation.
Other pertinent information:

APPENDIX B

Emergency Contacts and Hospital Directions

EMERGENCY CONTACTS

Designated person responsible for emergency response:

Jason Mello, Facility Response Coordinator/	978-352-8581
General Manager	

Agency or Firm	Telephone Number
Town of Georgetown Fire Department Emergency	978-352-5757 911
Town of Georgetown Highway Department Emergency	978-352-5704 911
Town of Georgetown Water & Sewer Department	978-352-5750
Massachusetts State Police Station A-2, SP Newbury	978-462-7478
MassDEP Emergency Response Center	888-304-1133
National Response Center (U.S. Coast Guard)	800-424-8802
MassDEP Oil Remediation and Compliance Bureau	888-304-1133
MassDEP	617-292-5500
U.S. EPA Region I	617-223-7265
Regional Center for Poison Control and Prevention	800-222-1222

Local Hospital:

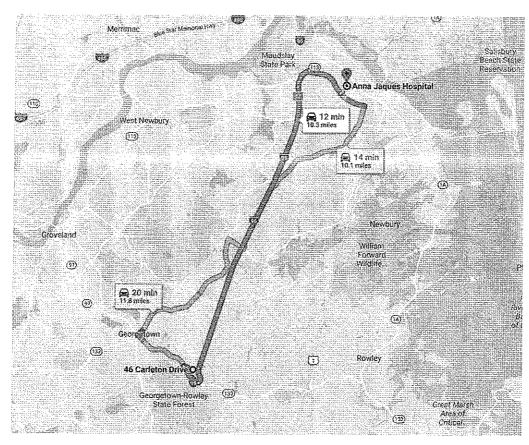
Anna Jaques Hospital 25 Highland Avenue Newburyport, MA 01950 978-463-1000 or 911

Emergency Response Contractor:

CYN Environmental Services, Inc.	800-242-5818
CHEMTREC Emergency	800-262-8200
New England Disposal Technologies, Inc.	800-698-1865

HOSPITAL DIRECTIONS

Anna Jaques Hospital, (978) 463-1000



From: 46 Carleton Dr, Georgetown, MA 01833 To: 25 Highland Ave, Newburyport, MA 01950 Distance: 10.3 miles Time: 13 Minutes

1.	Head northwest on Carleton Dr toward MA-133 W	0.2 mi
2.	Turn left onto MA-133 E	0.6 mi
3.	Turn left to merge onto I-95 N toward Salisbury/Portsmouth NH	0.4 mi
4.	Merge onto I-95 N	7.4 mi
5.	Take exit 57 for MA-113 toward W Newbury/Newburyport	0.2 mi
6.	Turn right onto MA-113 E/Storey Ave (signs for Newburyport/Newbury)	0.3 mi
7.	Turn right onto Low St	1.1 mi
8.	Turn left onto Wallace Bashaw Junior Way	341 ft
De.	stination will be on the left.	