

# Contingency Plan

## Seneca Meadows Solid Waste Management Facility

6NYCRR Part 360 Landfill

November 2016

**Prepared for:**

Seneca Meadows, Inc.  
1786 Salcman Road  
Waterloo, New York 13165

## REPORT CERTIFICATION

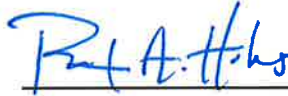
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### Contingency Plan

### Seneca Meadows Solid Waste Management Facility Waterloo, New York

The material and data in this report were prepared under the supervision and direction of the undersigned.

Cornerstone Engineering and Land Surveying, PLLC



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## TABLE OF CONTENTS

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<b>REPORT CERTIFICATION .....</b>	<b>II</b>
<b>LIST OF TABLES, FIGURES AND DRAWINGS .....</b>	<b>V</b>
<b>1 INTRODUCTION.....</b>	<b>1</b>
<b>2 CONSTRUCTION CONTINGENCY PLAN .....</b>	<b>3</b>
2.1 WORK DELAYS.....	3
2.1.1 INCLEMENT WEATHER.....	3
2.1.2 DAMAGED MATERIALS AND EQUIPMENT .....	3
2.2 UNAVAILABILITY OF MATERIALS/SUBCONTRACTORS.....	4
2.3 ON-SITE PERSONNEL INJURY .....	5
2.3.1 MINOR INJURY .....	5
2.3.2 INTERMEDIATE PERSONNEL INJURY .....	5
2.3.3 SERIOUS INJURY .....	6
2.3.4 ACCIDENT REVIEW.....	6
2.4 EXCESSIVE DUST.....	6
2.5 EXCESSIVE NOISE .....	7
2.6 EQUIPMENT BREAKDOWN/UNAVAILABILITY .....	7
2.7 UNUSUAL TRAFFIC CONDITIONS.....	7
2.8 UNCONTROLLED STORMWATER RUNOFF .....	8
<b>3 OPERATIONAL CONTINGENCY PLANS .....</b>	<b>9</b>
3.1 PERSONNEL AND USER SAFETY .....	9
3.2 EXCESSIVE DUST.....	10
3.3 LITTER .....	11
3.4 PRESENCE OF ODOR.....	11
3.5 NOISE .....	12
3.6 IDENTIFICATION OF VECTORS.....	13
3.7 EQUIPMENT BREAKDOWN/UNAVAILABILITY .....	13
3.8 UNUSUAL TRAFFIC CONDITIONS.....	14
3.9 GAS COLLECTION AND CONTROL SYSTEM.....	14
3.10 FIRE 15	
3.10.1 BUILDING AND EQUIPMENT .....	15
3.10.2 LANDFILL FIRE.....	16
3.11 DETECTION OF EXPLOSIVE LANDFILL GAS.....	17

3.11.1	SOIL GAS PROBES.....	17
3.11.2	STRUCTURES .....	18
3.11.3	REPORTING.....	18
3.12	EVACUATION PLAN .....	18
3.13	LEACHATE COLLECTION AND STORAGE CONTINGENCY PLANS .....	19
3.13.1	INOPERABLE LEACHATE PUMPS .....	19
3.13.2	LOSS OF ELECTRICAL POWER TO LEACHATE MANAGEMENT SYSTEM .....	19
3.13.3	LEACHATE TANKER SPILL OR LEAKAGE .....	20
3.13.4	LEACHATE CONVEYANCE PIPE LEAKAGE .....	20
3.13.5	STORAGE TANK LEAKAGE.....	21
3.13.6	UNAVAILABILITY OF APPROVED LEACHATE TREATMENT FACILITY .....	21
3.13.7	LOCATION AND DESCRIPTION OF ALARMS.....	22
3.14	SITE-WIDE LOSS OF POWER .....	22
3.15	RECEIPT OF UNAUTHORIZED WASTE .....	23
3.16	RELEASE OF TOXIC OR HAZARDOUS MATERIALS.....	24
3.17	PRIMARY LINER LEAKAGE .....	25
3.18	GROUNDWATER AND SURFACE WATER CONTAMINATION .....	27
3.18.1	GROUNDWATER CONTAMINATION.....	27
3.18.2	SURFACE WATER CONTAMINATION.....	28
	<b>LIMITATIONS.....</b>	<b>30</b>
	<b>TABLES .....</b>	<b>31</b>
	<b>FIGURES.....</b>	<b>32</b>

## List of Tables, Figures and Drawings

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### Tables

- 3-1 Seneca Meadows, Inc. Landfill Emergency Telephone Numbers
- 3-2 Seneca Meadows, Inc. Landfill Safety Equipment Available to Personnel

### Figures

- 2-1 Accident Report Form

# 1 INTRODUCTION

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Seneca Meadows, Inc. (SMI) currently owns and operates a New York State permitted Part 360 solid waste land disposal facility, (Permit 8-4532-00023/00001-0 SWMF 50S08) in the Town of Seneca Falls, Seneca County, New York.

The current landfill and approved liner construction areas would be situated on approximately 2,400 acres of SMI property holdings. These property holdings are located near the intersection of Salcman Road and Route 414, approximately 3.5 miles south of the New York State Thruway (Exit 41) and one mile north of the Route 414 intersection with U.S. Routes 5 and 20. Within these property holdings, the area occupied by landfill operations totals approximately 600 acres, including the existing landfill areas; existing and proposed stormwater management facilities; the leachate management facility; tire recycling facility; citizens drop-off and yard waste areas; and miscellaneous supporting facilities such as the office, access roads, and scales. The total landfill footprint, including existing and proposed areas is approximately 400 acres. Waste disposal operations are limited to the area zoned M-2 (industrial) within the Town of Seneca Falls. SMI maintains a gas flare system on the east side of Route 414, and the flare system occupies approximately two acres.

This Contingency Plan outlines contingency procedures that will be implemented for the continued operation of the landfill. This Contingency Plan specifically addresses the requirements set forth by 6 NYCRR Part 360; Solid Waste Management Facilities, Section 2.10. The actions described herein will be taken in the event that unexpected and unforeseen events, accidents or breakdowns occur at the SMI Landfill.

More specifically, this Contingency Plan addresses actions and responses to construction related contingencies, including:

- Unexpected, weather-related delays;
- Damaged materials and/or equipment;
- Unavailability of approved construction materials and/or subcontractors;
- Personnel injury;
- Excessive dust;
- Excessive noise;
- Equipment breakdown or unavailability;
- Unusual traffic conditions; and
- Uncontrolled releases of run-off.

In addition, this Plan address operational contingencies, including:

- Injuries sustained by landfill personnel and users;
- Fires;
- Detection of landfill gas;
- Dust;
- Litter;
- Noise;
- Odors;
- Equipment breakdown and unusual traffic conditions;
- Vectors;
- Receipt of waste not authorized to be disposed of at the facility;
- Release of hazardous or toxic materials;
- Groundwater or surface water contamination;
- Flow in the secondary leachate collection and removal system above the action leakage rate;
- The leachate storage tanks being at or above capacity, and tank spills or leaks;  
and
- Unavailability of an approved leachate treatment facility.

Additional information regarding the facility operations is presented in companion operational documents submitted as part of the original permit application.

## 2 CONSTRUCTION CONTINGENCY PLAN

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The following sections comprise the Construction Contingency Plan and will be included, where appropriate, in construction contract documents and specifications.

### 2.1 Work Delays

During the excavation and liner construction phases potential work delays may occur due to inclement weather, inoperable equipment or damaged construction materials.

#### 2.1.1 Inclement Weather

Work delays due to inclement weather could potentially affect the quality of work, construction schedules, and the coordination of subcontractors whose efforts are dependent on other phases of work. Heavy rains, winds and storms may also cause damage to site work that has already been completed and negatively impact phased construction schedules that may require re-working, re-grading, repairing, or draining water from excavated areas. To keep the projects on schedule, additional manpower will be hired, extra equipment will be leased and additional subcontractors may be retained. Additional laborers may be acquired on a temporary basis from local employment agencies. In the event that additional heavy equipment is required (graders, dozers, high-capacity pumps, etc.) local equipment companies or contractors may be contacted contingent upon construction-specific equipment needs.

Work delays due to inclement weather are not anticipated to have an impact on the overall construction schedule due to the availability of numerous equipment vendors, readily available labor supply and contingency subcontractors.

#### 2.1.2 Damaged Materials and Equipment

Construction contracts will include construction specifications, including the construction CQA/CQC Plan and will require the construction contractor to supply construction materials that are free from defects and are not damaged prior to use or installation. In addition to materials specifications listed in the Engineering Report and subsequent cell construction documents, material manufacturers will submit test results and analytical data (where appropriate) as well as material storage, handling, and installation information. The CQA/CQC Plan and Specifications specify the frequency and procedures to be followed in field inspections and tests of materials prior to their use to demonstrate that they are free of defects and not damaged.

Material found to be damaged or unfit for use and installation will be removed, replaced or repaired. Incidents will be documented where construction materials have been found to be unfit for use or installation. Replacement construction materials or the use of those which have been repaired will also be documented to confirm adherence to the



specifications outlined in the CQA/CQC Plan, construction specifications, or Engineering Report.

Construction specifications also include required specialty equipment such as geomembrane seam welders and destructive and non-destructive testing apparatus. Specialty equipment specifications provided in bid documents will establish the types and specifications of equipment to be used in the construction of various components of the landfill. The construction contractor will, therefore, be required to submit a list of equipment proposed for use during the construction of the landfill. The equipment list will include specialty equipment and testing apparatus as well as more commonly used heavy equipment. The construction contractor will be responsible for providing equipment used for construction in proper working order and maintained according to equipment manufacturers' specifications.

In the event that materials or equipment used for landfill construction are found to be damaged, materials will either be returned to the vendor for replacement or purchased from another supplier. Depending on the nature of damage sustained by equipment, repairs will be made by the on-site equipment mechanic. Larger repair jobs (i.e., engine re-bore) will be contracted to a local heavy equipment repair garage. Equipment that is unavailable due to damage will be temporarily replaced by a leased substitute having comparable or greater capability. Delays due to damaged equipment will be minimized by both on-site repair services and replacement availability through local heavy equipment vendors.

## **2.2 Unavailability of Materials/Subcontractors**

Materials proposed for use in the construction of the landfill are generally standard components/media available through a variety of local dealers and manufacturers. Various materials used for the construction of the landfill include, for example, earthwork fill material, liners, geotextiles, leachate conveyance pipe, flow control and metering devices, etc. In the event that a pre-fabricated specific component or design structure is not available, it will be custom made for the appropriate use for which it is intended.

In the event that the aforementioned local material suppliers and subcontractors are unavailable, the geographical scope will be enlarged to solicit material suppliers and subcontractors from cities such as Buffalo, Binghamton, Albany in New York, Newark, New Jersey and Scranton, Pennsylvania. If the expanded scope of materials and equipment suppliers proves unsuccessful, construction efforts will be redirected, as applicable, until the appropriate materials or equipment have been secured for on-site use. Revisions to construction schedules will be made accordingly where appropriate.

## 2.3 On-Site Personnel Injury

During construction the onsite managers (General Manager and Landfill Operations Manager) will enforce the use of protective apparel including, but not limited to, reflective clothing, hard hats, safety glasses, and appropriate footwear. Upon being hired at SMI, new employees will receive a copy of the SMI Health and Safety Plan and Personal Protective Equipment sign off as well as Landfill Safety Procedures sign offs. Contingent upon the nature of the construction project, dust masks and respirators will also be available for on-site personnel. Every effort will be made to follow safe practices that prevent on-site personnel from getting injured. First aid kits are located in the main office, equipment maintenance shop, select on-site pickup trucks and in one of the compactors at the working face. Regardless of the severity, incidents resulting in personnel injury will be documented. An accident report can be seen in Figure 2-1.

### 2.3.1 Minor Injury

Minor injuries sustained by landfill employees such as insect stings, minor cuts and abrasions, as well as minor burns will be treated by an SMI employee having successfully completed a first aid training program. For liability purposes, material and equipment suppliers as well as other site visitors will not be given first aid treatment. The visitor will instead be directed to receive medical attention from their physician, hospital or local health clinic in proximity to their residence, or if they do not reside locally will be given the names and locations of local health care facilities which can assist them, at their choice.

### 2.3.2 Intermediate Personnel Injury

Intermediate personnel injuries consist of incidents resulting in, for example, minor burns, punctures and sprains where the victim is not incapacitated as a result. Employees sustaining such injuries will be administered first aid at the site by a trained employee only. SMI's staff includes personnel trained in first aid, CPR, and AED use. The injured employee will then report to or be taken to the SMI occupational physician. Contingent upon the nature of the injury, the employee may elect to visit their personal doctor, or may be transported to an urgent care center in Seneca Falls or Geneva or the hospital emergency room at Geneva General Hospital, located at 196 North Street in Geneva, New York for examination and treatment. Regardless of the nature of the injury, an accident report form will be completed and filed by either the Landfill General Manager or Operations Manager.

Unless it is deemed absolutely necessary, again for liability purposes, on-site visitors sustaining injuries that are not incapacitating will not be given first aid at the site. Personal information about the victim will be collected for the purposes of completing the accident report form and the visitor will be instructed to receive primary care from their physician or hospital. Depending on the nature of the injury, they may be transported to the hospital emergency room at Geneva General Hospital, located at 196 North Street in Geneva, New York for examination and treatment.

### **2.3.3 Serious Injury**

In the event of a serious injury to an employee or visitor, first aid will be administered to the degree only in which further harm to the accident victim is prevented. First aid will be rendered only by individuals who have had proper first aid training. Seneca County 911 will be called immediately and the North Seneca Ambulance Service is currently located adjacent to the landfill facility. An employee will be dispatched to direct the ambulance to the scene. The telephone number of the ambulance service is posted conspicuously near telephones at the landfill. Unless the location poses an immediate further threat to the life of the injured party, those having been seriously injured will not be moved until trained emergency medical technicians arrive.

### **2.3.4 Accident Review**

The General Manager or Operations Manager will undertake an investigation of the accident and occurrences leading to the accident. This investigation will commence as soon as possible after the accident and witnesses and people involved will be interviewed. The cause of the accident will be determined upon review of data collected during the investigation and if warranted, corrective measures will be implemented to help prevent future like occurrences. The Health and Safety Office will also contact the Regional Health and Safety Manager.

The exact corrective measures implemented will be appropriate to the nature of the incident. Corrective measures may take the form of equipment repair or replacement, the installation of additional safety equipment, a revision of the procedures unique to the project, or meeting with the contractor and/or subcontractors to further emphasize and instruct employees on safe operating procedures and work habits. If it has been determined that the reasons for the accident were related to unsafe employee work habits, the General Manager or Operations Manager will convene a meeting with site employees to discuss the accident and the corrective measures that will be effected to prevent a recurrence and to instruct and remind employees of proper safety procedures. The General Manager or Operations Manager will follow up as a check that recommended corrective measures have been implemented and proper safety precautions are being taken.

## **2.4 Excessive Dust**

Earthwork construction activities can result in the generation of dust due to heavy equipment traffic. On-site water trucks are used to dampen roads, earthen surfaces and construction routes to control dust generated due to equipment traffic or windy conditions. Water is drawn from former borrow pit locations and SMI's existing and proposed stormwater retention ponds.

In addition to water trucks, vehicle speed limits are posted as needed to reduce speed and, therefore, fugitive particulate emissions. Most permanent roads have also been paved in an

effort to reduce dust, and these paved surfaces are routinely cleaned to remove dirt and debris before it can become airborne. In addition, SMI utilizes a street sweeper along paved roads to minimize generation of dust, and if construction vehicles are entering and exiting the site, they will use the wheel wash facility, as is further described in Section 3.2.

## **2.5 Excessive Noise**

Heavy equipment operating at the landfill will produce noise. Operating hours are set forth in the Operations and Maintenance Plan. In addition, construction activities will generally be confined to a regular workday. Construction activities will be carried out with the intent of minimizing noise. Internal combustion powered equipment used for construction and operation of the landfill and associated facilities will be equipped with mufflers.

If noise levels beyond the property line become excessive, SMI will determine the source and implement corrective measures. Corrective measures may take the form of muffler and exhaust system repairs or replacement, as well as other required mechanical work. Additional corrective measures that may be taken include revised work schedules and the use of fewer or smaller, quieter equipment. Ultimately, if these measures fail to resolve the noise issue, the use of a temporary noise barrier may be assessed.

## **2.6 Equipment Breakdown/Unavailability**

As previously discussed in Section 2.1 of this Contingency Plan, depending on the nature of equipment repairs required, most repair work will be made by the on-site equipment mechanics. Larger repair jobs; i.e., engine re-bore, will be contracted to local heavy-equipment repair garages. Equipment that is unavailable due to breakdown will be temporarily replaced by a leased substitute having comparable or greater capability from a local firm. In the event that the equipment requiring temporary replacement due to repair down time is unavailable from the above listed sources, additional vendors in the region will be contacted for availability and rental information. In the event that this course of action proves unsuccessful, the geographical scope will be broadened to include a vendor search and equipment availability status from vendors located in areas such as Albany, Binghamton, and Buffalo, New York.

## **2.7 Unusual Traffic Conditions**

Unusual traffic conditions may conceivably be caused by the combined waste disposal traffic entering the landfill and traffic entering the facility for the purposes of delivering construction supplies and earth hauling/excavation vehicles. To prevent traffic congestion from occurring, landfill construction vehicular routes will be established to minimize interference with vehicles entering the facility for waste disposal. These routes will be clearly marked to direct appropriate vehicles and equipment to either the active working face or landfill construction sites.

The queuing area for the landfill is approximately 1,000 feet long and nearly 100' wide. In the event that traffic congestion occurs, this queuing area is available to both stage vehicles and segregate traffic flow. Temporary access routes may be established off of the entrance road for equipment and materials delivery arriving at the construction site(s). A flagman may be dispatched to control and direct traffic flow away from the entrance off of Route 414 and to queuing areas or construction access routes. Waste hauling vehicles must proceed to the scalehouse before entering the facility and their route will be maintained.

## **2.8 Uncontrolled Stormwater Runoff**

Throughout construction of the landfill areas, the site will be graded to control erosion while directing stormwater to detention/sediment basins as shown on the drainage engineering drawings, Sheets D-1 through D-21 and the current site SWPPP. During construction, stormwater routed to the detention/sediment basins will be batch discharged, following confirmation that discharge water quality criteria have been met. Construction stormwater practices will also be in accordance with a Stormwater Pollution Prevention Plan (SWPPP) prepared pursuant to the SPDES general permit for industrial activity. During construction of the landfill cells, accumulations of stormwater will be pumped from excavated areas to the detention/sediment basins. Channels will be excavated to convey stormwater from the construction area to the stormwater detention/sediment basin or an appropriate sump location thereby preventing uncontrolled releases of stormwater to Black Brook or the Seneca-Cayuga Canal. Channels leading to the detention/sediment basin will be fitted with sedimentation control features as required by the current SWPPP. The use of silt fence sediment barriers, for example, will minimize sediment loading to the basins. The detention/sediment basins are sized to accommodate the stormwater runoff, from the maximum operational/construction area.

### 3 OPERATIONAL CONTINGENCY PLANS

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The following sections describe measures that will be taken in response to unforeseen incidents which may occur once landfill construction has been completed and the landfill is accepting waste on a regular basis.

The General Manager and Operations Manager are responsible for administering the Contingency Plan and will coordinate response efforts and reaching the appropriate emergency agency. Two-way radio communications are afforded at the main office, scale house, and equipment maintenance shop for the purpose of summoning assistance. Landfill vehicles are equipped with a transceiver and portable units are also given to personnel for the purposes of maintaining continual contact in the field. After being notified that a contingency situation exists, the SMI Manager, or a designee, will immediately contact the appropriate response agency, if applicable, and coordinate response efforts. Emergency telephone numbers will be posted conspicuously in close proximity to telephones and are shown on Table 3-1. Immediate on-site notification will be made with the use of the two-way radio communication system.

Other in-house documents utilized at the site include an evacuation plan; SMI's One Plan, which includes spill prevention, control and countermeasures (SPCC); and fire prevention plan. In addition to these collective contingency plans, measures are outlined in the Environmental Monitoring Plan (EMP) that are to be followed in the event of the identification of a significant increase in the change to existing water quality and a protocol to be followed in the event of an exceedance of the allowable leakage rate for the primary landfill liner. In adhering to the aforementioned programs, SMI anticipates minimizing the risks to the environment and on-site personnel as well as those who utilize the facility for disposal.

The facility also maintains a Start-up, Shutdown and Malfunction (SSM) Plan for the gas collection system in accordance with 40 CFR Part 63, Subpart AAAA. The SSM Plan describes in detail:

- Procedures for operating and maintaining the landfill gas collection and control equipment during start-up, shutdown and malfunction events; and
- A program to adequately provide corrective actions to repair the malfunctioning equipment as soon as practicable and to minimize excess emissions of hazardous air pollutants.

Details of the Gas Collection and Control System (GCCS) Plan are contained therein.

#### 3.1 Personnel and User Safety

During operation, personnel are potentially exposed to different various risks than during construction of the landfills. Response procedures for on-site personnel injury during

landfill operation are identical to those during construction of the landfills, whether minor, intermediate, or serious. Responses to these levels of injury severity are described in Section 2.0 of this Contingency Plan. An accident review discussed in Section 2.0 of this Contingency Plan will also be conducted after the occurrence of incidents leading to personnel injury during operation of the landfills.

Through the use of training, educations, signs and other operational controls and equipment, both landfill personnel and facility users are afforded safeguards against injury, accidents and vehicular damage. In-place operational controls aimed at providing both users and personnel with safeguards include: posted speed limits on access roads and facility entrance, a convenience drop-off area to minimize traffic and prevent congestion at the working face, the adherence to established excavation and trenching procedures (including the entry to confined spaces), a hazard communication program for materials used at the facility as well as the use of good engineering practices. Typical safety equipment available to personnel for monitoring and maintenance activities is presented in Table 3-2. Operational practices are described in more detail in the Operations and Maintenance Plan.

### **3.2 Excessive Dust**

Landfill operational activities and routine truck traffic normally result in the generation of some dust. Water trucks are used to dampen road surfaces and construction routes to prevent excessive dust due to equipment traffic or windy conditions. On-site water truck(s) are used to dampen road surfaces and equipment routes. Water is drawn from former borrow pit locations and SMI's stormwater retention ponds.

If the dust is generated due to a specific construction project, work procedures will be reviewed and adjusted to mitigate its generation. These procedures might include: additional water trucks, scheduling of work around periods prone to produce excessive dust (hot and dry), modifying work procedures or travel routes. Soil piles may be vegetated to reduce the potential for wind disturbance.

Most permanent road surfaces have been paved to reduce dust including those receiving the most traffic. Road sweeping machine(s) are used to clean the paved roads to remove dirt and debris before it can be disturbed. In addition, a wheel washing facility is in use for haul vehicles that exit the site, to remove soil adhering to vehicle tires and under-carriage so that dust on paved roads will be further reduced. Depending upon the road and weather conditions, trucks exiting the site use the wheel washing facility prior to crossing the outbound scale.

Excessive dust can also result from some waste placement operations. Some more dust-prone waste materials such as foundry sand may become windborne and cause localized, temporary dusty conditions. Such wastes may be sprayed or dampened before arrival at the landfill if appropriate. As a secondary recourse to minimize their escape, the dust-

prone waste would be deposited in a trench excavated from the existing waste mass and covered as soon as practicable.

### 3.3 Litter

The presence of litter will be controlled with the use of an untarping area utilized by incoming waste hauling vehicles in the queuing area. Additionally, after a vehicle has deposited waste at the working face, it is the responsibility of the driver to ensure that the vehicle has been swept out and loose debris has been removed. The generation of litter caused by waste hauling vehicles is not anticipated to pose problems at the facility. In the event that litter has become windborne due to improper practices, a crew will be dispatched immediately to the scene to collect and remove debris. If the waste hauler is still present or known to be the cause, he/she will be apprised of the matter.

Litter that escapes from the working face of a fill area will be controlled by litter fences and netting. Smaller, temporary snow fencing and portable screens will be placed around the fill areas and moved or modified to maintain performance with given changes in filling operations or wind direction and velocity. A crew has been assigned the task of collecting windblown litter at the working face fences, as well as along major routes in close proximity used to gain access to the facility. The labor effort will be increased to expedite such clean up operations, if needed based upon the degree of litter experienced.

If landfill personnel observe a waste hauling vehicle untarping prematurely the driver will be informed immediately of the infraction, given a warning and the waste hauling company representative will be contacted and apprised of the incident. SMI will not accept waste loads from vehicles that arrive at the landfill without being properly tarped or covered.

### 3.4 Presence of Odor

Municipal solid wastes, sludges and constituents within landfill gas are believed to comprise the main source of odor at landfills. To address odor issues at SMI, a comprehensive odor control plan has been prepared and implemented as part of the see Operations and Maintenance (O&M) Plan for the site. Daily cover material is applied to the compacted waste to minimize the potential for odor problems. In the event that odors are detected off-site, or deemed by the NYSDEC on-site monitor or Operations Manager to be problematic, a number of actions may be taken. At the onset, it should be verified that the landfill is in fact causing the odor problem. Nearby industries or wastewater treatment plants, for example, may be causing or contributing to the odors. If sand or processed construction and demolition debris is used for daily cover, a less porous or thicker cover may be used. If a change in daily cover does not minimize odors to the extent acceptable, additional measures will be utilized, such as adding granular neutralizer.

Additional odor controlling measures would potentially include an inspection of the landfill to determine if gases are emanating from a point source. Alternate waste filling



strategies may be employed including the immediate placement of cover soils after waste deposition or avoidance of segregated trenches for materials such as sludge. Another course of action that may be taken in the event that an identifiable waste mass is causing odors would be the application of lime or lime supplemented cover material or the application of odor masking agents. If a point source is identified, the area in the vicinity of the point source will be rehabilitated or additional clay cover placed. Intermediate cover will be placed in areas where waste filling will not occur for a prolonged period to minimize gas emissions. Gas extraction wells and horizontal well heads will also be inspected to determine if there is a leak from the well itself, or from the seal placed in the final cover. Leaks discovered in the gas collection system will be repaired.

One of the key aspects of odor management is the proactive installation and operation of the landfill gas collection and control system. Applicable regulations (at 40 CFR 60.753) require that gas collection be installed in waste that has been in place for 5 or more years in active areas of the landfill or 2 years in areas that are closed or at final grade. SMI uses this as the maximum duration that waste can be in place before gas is actively collected. SMI typically installs collection components as waste is being placed so that gas is generally being collected from waste that has been in place for 12-18 months. This is the point at which sufficient methane and landfill gas is generally being generated that can cause gas-related odors, although this can be influenced by several factors.

As noted in the Comprehensive Odor Control Plan, SMI also operates an odor neutralization system on a routine basis. In response to odor contingency events, the odor neutralization system operation may also be modified, for example, by changing scent ratios, adding more system coverage, or moving the location of the misting system.

As described in detail in the Comprehensive Odor Control Plan, SMI also maintains a 24-hour complaint line and prepares a log of complaint calls and uses checklists to aid in the evaluation and response to complaints.

Leachate stored on site and contained in transportation vehicles comprises a secondary potential odor source. The leachate storage tanks may be aerated and will be opened annually to be drained and cleaned. Necessary repairs to the tanks will be done at this time. The leachate tank and transportation vehicles will be sealed to prevent odors from emanating.

### **3.5 Noise**

As described in Section 2.5, heavy equipment operating at the landfill will produce noise. Operating hours are set forth in the Operations and Maintenance Plan and operational activities will generally be confined to a regular workday. Operations will be carried out with the intent of minimizing noise to the applicable levels set forth by 6 NYCRR Part 360-1.14(p). Internal combustion powered equipment used for operation of the landfill and associated facilities will be equipped with mufflers. In addition, the landfill operational

procedures include the construction of perimeter operational berms behind which continued waste placement occurs, to shield the operations from the site boundaries and reduce, among other things, noise levels. In addition, access roads have been preferentially located to minimize the proximity of landfill traffic to the property line, as the vehicles are climbing roadways to disposal areas.

If noise levels beyond the property line exceed the applicable, aforementioned regulatory levels, SMI will determine the source and implement corrective measures. Corrective measures may take the form of muffler and exhaust system repairs or replacement, as well as other required mechanical work. Additional corrective measures that may be taken include use of series muffler systems and revised work schedules and/or a temporary noise barrier.

### **3.6 Identification of Vectors**

The application of daily cover comprises the primary safeguard against vector problems. Historically, SMI has not experienced persistent vector problems as compacted wastes and cover soils restrict access to the waste.

In the event that consistent identification of insects or rodents arises, a vector population control program will be initiated. The services of a licensed pest control specialist will be enlisted. The exact nature of the program will be dependent upon the area affected as well as the vector population. The vendor selected will abide by the requirements of the New York State Department of Health and the New York State Department of Environmental Conservation.

### **3.7 Equipment Breakdown/Unavailability**

As seen in Section 4.0 of the Operations and Maintenance Plan, SMI will have a sufficient equipment source available for landfill operations in the event that one specific piece of equipment breaks down. In the event that one specific piece of equipment breaks down or becomes unavailable for another reason (i.e., scheduled maintenance), it will be replaced by another of comparable capability obtained from available on-site equipment. Available substitute equipment includes not only that used for waste placement, but also ancillary equipment such as leachate pumps and gas blowers used to convey landfill gas to the energy recovery facility. As previously discussed in Section 2.6 of this Contingency Plan, depending on the nature of the repairs required, most repair work will be made by the on-site equipment mechanics. Larger repair jobs (i.e., engine re-bore) will be contracted to local heavy-equipment repair garages. Equipment that is unavailable due to breakdown will be temporarily replaced by a leased or rental substitute having comparable or greater capability.

In the event that the equipment requiring temporary replacement due to repair down time is unavailable from the previously listed sources, additional vendors in the region will be

contacted for availability and rental information. In the event that this course of action proves unsuccessful, the geographical scope will be broadened to include a vendor search and equipment availability status from vendors located in such areas as Albany, Binghamton, and Buffalo, New York.

### 3.8 Unusual Traffic Conditions

Potential causes for vehicular backlogs include, for example, inclement weather conditions and malfunctioning scale equipment. Sufficient queuing area is available along the new access road, as previously described in Section 2.7. In the event that traffic builds up prior to passing across the scales, vehicles will line up in the queuing area, and there will be ample capacity to avoid queuing off of SMI property. In cases where inclement weather is significantly affecting the acceptance of waste thereby causing unusual traffic conditions, operations may be temporarily suspended and haulers who have not yet departed will be notified of the temporary closure and anticipated re-opening of the facility. In cases where scale equipment is malfunctioning, repairs will be initiated immediately by calling an appropriate scale repair company.

SMI has three weight scales operating on site, which can be used interchangeably for incoming and outgoing traffic. In addition, depending upon needs and the nature of the equipment failure and expected down time, a portable scale may also be rented for interim use.

### 3.9 Gas Collection and Control System

The gas collection and control system (GCCS) is designed with certain contingencies that include:

- It can be expanded, as necessary, to control landfill gas if certain areas of the landfill require more control than anticipated;
- The system is generally modular in design such that individual components can be removed and repaired or replaced, as-needed; and
- Gas headers, horizontal and vertical collectors are equipped with valves that can increase or decrease vacuum to the collectors based on specific site conditions.

These design and operational parameters are included in the GCCS Plan for the site. Still, it is understood that malfunctions can occur. The SSM Plan for the gas collection and control system is developed to minimize air emissions during routine and non-routine operation of the following equipment:

- Gas wells and horizontal collectors
- Landfill gas moving equipment (blowers)
- Lateral and header extraction piping

- Temperature monitoring and recording equipment
- Flow monitoring and recording equipment
- Enclosed Flares

The plan details specific reporting (including appropriate notifications to the NYSDEC) and corrective measures to be implemented during a malfunction. Further, if the plan fails to adequately address a malfunction event, it must be modified within 45 days to include procedures to address possible similar events in the future.

Should the gas collection system be down for an extended period of time, valves in the system contributing to venting of gas to the atmosphere are to be closed within 1 hour. The gas movement system is designed with multiple blowers such that four are typically are operating continuously with a two additional units as a back-up for maintenance or in the event of a malfunction. While the blowers are run by a redundant, automated process logic control (PLC) system, and variable frequency drives on the blowers with redundant automation, the system can also be fully operated in manual mode. The PLC system also has redundant uninterruptible power supplies (UPS) in the event of short-term power interruption.

The current Title V permit for the facility requires that SMI provide a generator for back-up power in the event that a flare outage, caused by loss of off-site power, is greater than 2 days duration. If projected downtime is more than 10 days, the landfill must make arrangements to provide temporary “candlestick” flares.

### 3.10 Fire

In the event of a fire, every attempt will be made to minimize personal injury, property damage and traffic congestion so operations may resume once the fire has been extinguished. Fire extinguishers are to be mounted within easy reach on landfill vehicles and are to be accessible at various locations in on-site structures.

#### 3.10.1 Building and Equipment

Buildings will be constructed in accordance with national, state and local fire codes and ordinances. On-site, portable equipment that can be used for extinguishing and containing small fires in buildings includes portable fire extinguishers, water trucks, or the hydroseeder. Portable extinguishers will be appropriately mounted in buildings and on-site equipment. Training in the use of on-site fire fighting equipment will be provided to SMI employees. While small fires can be extinguished by SMI personnel, at the first indication the fire is getting out of control and cannot be adequately handled with the use of on-site equipment, the Waterloo Fire Department will be called. Fire department and other emergency agency phone numbers will be conspicuously posted by telephones at SMI.

### 3.10.2 Landfill Fire

As part of incoming waste load screening practices, waste loads will be observed for indications that the load is smoldering to minimize the potential for a hot load being deposited at the active working face. In the event that a hot load is identified at the working face, the Operations Manager will immediately direct personnel and waste haulers away from the area. Using two-way radio communications equipment, the Operations Manager will then instruct equipment operators at the working face to push cover soils over the affected area, and divert additional cover material arriving at the site up to the working face. The Operations Manager will notify the Engineering Department of the incident and magnitude of the fire. Based on these observations, the decision will be made to handle the fire internally or if a telephone call to 911 should be made. The Scale Operator will close the scale preventing waste vehicles from proceeding to the landfill. As long as it is deemed safe, cover soils will be pushed up to and over the fire to the extent that personnel safety is not compromised. Upon the arrival of fire crews, landfill operators will subscribe to the crew leader's instructions. After it has been determined that the fire has been extinguished, the area will be regraded and the resumption of normal landfill activities can take place.

The risk of fire in a landfill is generally low; however, it is something that is planned for. SMI has excellent on-site resources that would be drawn from in the event a fire did occur. On-site resources include:

- Highly trained and experienced staff who are Hazardous Waste Operations, 40-hour trained;
- Many of SMI's full and seasonal staff have "fire" training through local volunteer fire departments;
- Three water trucks;
- Approximately 500 gallons of "cold fire" suppressant;
- Available construction equipment with experienced operators;
- Nearby soils that can be imported quickly to smother a fire; and
- SCBAs for emergency response.

At the Seneca Meadows facility, there are about eight potential sources of fire. They include:

- Landfill Gas: There is the potential for heat to be generated as the breakdown of waste material occurs in the landfill.
- Hot Load: There is the potential for waste loaded into vehicles for transport to the landfill to smolder and generate heat. This can be the result of many factors.

SMI's experienced waste placement staff is trained to monitor waste as it comes off the vehicles for such occurrences.

- Chemical Reaction: While the waste streams that come to the facility are closely monitored, there is still the potential for fire to occur due to chemical reaction. SMI has an experienced first response team that is called upon in the event of such incidents.
- Equipment Failures: The majority of SMI's on-site equipment is designed with fire suppressant systems. There is still the possibility for an equipment failure to result in a fire. SMI has an experienced first response team that is called upon in the event of such incidents.
- Electrical Fire: The landfill site is electrically powered from the on-site landfill gas to the energy facility. The infrastructure is in place to deliver electricity around most of the site. With power distribution of this scale, there is the potential for an electrical fire to occur. To better manage the risk of electrical fire, SMI conducts regular maintenance on the power infrastructure. Vegetation around the power lines is trimmed regularly.
- Tire Fire: SMI operates a waste tire shredder, and shredded tires are used at the facility in construction. SMI shreds approximately two million tires per year. This activity presents the potential for fire to occur. To minimize this risk, great care is taken with the management of the tire facility. Shredded tires are stored in windrows and are constructed specifically to monitor for heat and to allow for access in the event a fire occurs. Also, the tire facility houses a stockpile of "cold-fire" fire suppressant needed to extinguish a "tire-fire."
- Weather Related: The threat for fire related to the weather in Upstate New York is lightning. To manage this risk, the buildings and stationary equipment; i.e., flare, are grounded.

## 3.11 Detection of Explosive Landfill Gas

### 3.11.1 Soil Gas Probes

Soil gas probes are to be located around the landfill footprint for the purposes of monitoring the potential lateral, subsurface migration of landfill gas. Due to the low permeability of native soils, and the construction and operation of a gas recovery and extraction system, gas migration has historically never been discovered at Seneca Meadows. Soil gas monitoring procedures for explosive gas at the Seneca Meadows facility are described in the Gas Monitoring and Emission Control Plan, included as an appendix to the O&M Plan.

In the event that landfill gases are detected at greater than 25% of the LEL at the soil probe locations, additional gas monitoring points will be installed adjacent to the point of detection in order to identify the nature and extent of gas migration. SMI engineering

personnel will be notified to review the results of the soil gas monitoring to assess the need for further investigation and monitoring. Where appropriate, additional monitoring of these points will be undertaken daily to aid in the identification of the source or direction the gas is traveling, and will also serve as re-verification that a migratory pathway does indeed exist. Additional soil probes may also be installed in the direction of the landfill to help determine the potential migratory pathway that the gas is following. Specific response actions may be recommended.

### **3.11.2 Structures**

In the event that landfill gas levels are detected in excess of 25% of the LEL in on-site or off-site structures, contingency measures will be taken. Soil probes will be installed between the structure and the landfill and surface monitoring will occur to identify gas migration pathways. To alleviate the potential for explosive conditions within the structure, venting mechanisms may be installed to promote constant air exchange or the structure will be sealed and connected to the site-wide landfill gas collection system.

### **3.11.3 Reporting**

The NYSDEC will be notified in accordance with the program identified in the current Gas Monitoring and Emission Control Plan for the site of the detection of methane at greater than 25% LEL (steady state). A report will be submitted documenting the gas levels detected, the exact locations of the detection(s), and a description of the steps that were taken to protect personnel safety.

Within 45 days of documented, steady-state LEL readings in excess of 25%, SMI will submit a plan to the NYSDEC outlining the implementation of a remediation plan. The plan will include a schedule for the implementation of the specified remedial effort which will commence within 60 days of the reading of steady-state gas levels greater than 25% LEL. The plan will also address the nature and the extent of the problem as well as a detailed description of the proposed remedy.

## **3.12 Evacuation Plan**

In an emergency situation and time permitting, the onsite landfill managers are responsible for determining when an evacuation is required. The managers are also responsible for implementing the evacuation of personnel from the facility. Immediate or imminent dangers requiring evacuation from the facility include:

- An explosion or threat of explosion that cannot be averted (including bomb threats);
- A generalized fire or threat of generalized fire that cannot be averted; and,
- A major spill or leak that cannot be contained and threatens human welfare.

In the event that evacuation is required the following procedures will be undertaken, time permitting:

- Facility personnel will be notified using either the two-way radio communications system or telephone paging system as appropriate;
- Landfill equipment is to be shut down;
- Visitors to the site will be notified by landfill personnel and instructed to leave the site in an orderly manner;
- Facility and office personnel will meet at the main office - this will allow for a 'head count' of missing personnel;
- Once assembled at the main office, personnel will be directed as to the need to leave the site or dismissed when it is deemed appropriate and personnel services are not required; and
- NYSDEC and NYSDOH personnel will be contacted and the status of the situation/potential risks involved will be relayed.

### **3.13 Leachate Collection and Storage Contingency Plans**

As described in the Engineering Report, leachate will be collected automatically from each leachate well at the existing landfill and from the existing and proposed sump locations using electrically controlled pumps. The pumps convey leachate into a force main which then empties into a leachate storage tank. Contingency plans as they relate primarily to the leachate collection, storage and conveyance systems include plans that will be followed in the event that leachate pumps become inoperable, the collection, conveyance and storage systems experience a loss of electrical power, the storage tank attains maximum capacity, a tanker spill or leak occurs, and the primary leachate treatment facility becomes unavailable.

#### **3.13.1 Inoperable Leachate Pumps**

Seneca Meadows will maintain an appropriate inventory of replacement parts and pumps based on equipment reliability and accessibility. In the event of a leachate pump failure, a mechanic will repair or replace the inoperable pump. When an irreparable pump is replaced, a new pump will be purchased to maintain contingency availability.

#### **3.13.2 Loss of Electrical Power to Leachate Management System**

In the event of a power failure affecting local NYSEG service, a fuel driven electrical generator will be used to supply electricity to the leachate management facility. In the event that power from one source is lost, it will be replaced as soon as practicable to ensure that flow monitors, pumps, level alarms and pump controllers are operational. Interruptions to the provision of electricity are generally short-lived and not anticipated to



adversely affect the leachate management system. In the event of a power outage, back-up generators may be obtained for interim use. Leachate Storage Facility at Approved Capacity

An overflow protection system exists in the 500,000 gallon leachate storage and 100,000 gallon concentrate storage tanks consisting of a level sensor, high level alarm, and automatic shutoff. When the available on-site storage is at a level that triggers the sensor alarms, a procedure to closely monitor leachate flow rates and tank volume will be implemented. This procedure will consist of determining the total volume of leachate pumped in and out of the tank during the previous 48 and 72 hour periods and making necessary adjustments in the collecting and trucking for the immediate 24-hour period. Monitoring the daily change in capacity and rate of increase will allow Seneca Meadows ample time to schedule more trucks or to implement an alternative leachate management strategy. The Landfill Operations Manager will be responsible for determining when more trucks will be required for delivering leachate to available wastewater treatment plants or the Village of Seneca Falls Wastewater Treatment Plant via direct sewer connection.

In the event that more trucks are required for the removal of leachate, the local haulers will be contacted and additional tanker trucks will be utilized to assist SMI in collecting and delivering the leachate to the aforementioned treatment facilities.

### **3.13.3 Leachate Tanker Spill or Leakage**

In the event that a leachate transfer vehicle develops a leak, the contents of the truck will be emptied into a second leachate transfer vehicle or leachate holding tank. In the event that SMI's trucks are temporarily out of service, a local hauler will be contacted and additional tanker trucks will be utilized to assist SMI in collecting and delivering leachate to approved treatment facilities.

Liquid suspected of originating from the leachate transfer vehicle will be cleaned up as soon as practicable. Absorbent pads, blankets and booms will be used where appropriate and surficial soils will be scraped from the affected area and replaced with clean soils obtained from a local borrow pit. Affected soils and clean-up materials will be placed into a roll-off container and sampled for hazardous waste characteristics, as appropriate. Upon review of the analytical data, if applicable, a determination will be made as to the final disposition.

### **3.13.4 Leachate Conveyance Pipe Leakage**

As discussed in the Engineering Report, the site-wide leachate conveyance system will consist of single wall leachate conveyance pipe within the landfill footprint and dual containment leachate conveyance pipe outside the landfill footprint to properly detect and contain leakage. Leak detection risers and manholes will be located along the dual containment conveyance pipe and provide the means for conducting visual inspections at regular intervals.

If a significant quantity of liquid is observed in the leak detection risers or manholes during regular inspection then the section of pipe in question will be closed until an evaluation can be made as to the significance and possible location of the leak. Manholes and sideriser stations will be equipped with the proper valves and riser pipes to allow leachate to be pumped by SMI's leachate vacuum pump truck without compromising the collection ability of the system.

The liquid will be pumped out and sampled to determine if there are leachate constituents present. The leak detection riser will then be visually inspected over a seven-day period to quantify liquid collected. If the liquid is determined to be leachate then the section of pipe in question will be evaluated to best determine where the leak is occurring and potential corrective actions before repairs are made.

### **3.13.5 Storage Tank Leakage**

Leak detection risers and visual inspection provide the means of identifying a leak from the leachate storage tanks. In the event that a leak is discovered at either the 500,000 gallon leachate storage tank or the 100,000 gallon leachate concentrate tank, the tank will be drained with the use of additional sub-contracted licensed haulers. Of note, the tank(s) have secondary containment equal to or greater than 110 percent of the tank storage capacity. Tanker trucks will be utilized to assist SMI in collecting and delivering the leachate to a permitted wastewater treatment facility or the Village of Seneca Falls Wastewater Treatment Plant via sewer connection. Flow to the tank will be shut off and redirected to a combination of smaller, temporary storage tanks and leachate transfer vehicles while requisite repairs are made, or transfer will be made to the second tank which will be available in the future, as piping will be in place to convey flow to either leachate tank.

### **3.13.6 Unavailability of Approved Leachate Treatment Facility**

Seneca Meadows currently holds agreements with the Village of Seneca Falls Wastewater Treatment Plant (sewer connection) and several other POTWs to accept leachate and leachate concentrate from the facility. SMI has arranged disposal agreements with multiple facilities to provide both routine and contingency disposal capacity that is greater than expected leachate generation rates. In the unlikely event that a single facility is unable to fulfill treatment needs, the multiple agreements that are in place allow SMI to meet the leachate disposal needs for the facility. New uses or treatments, including those previously mentioned, will be investigated by SMI and undertaken with the concurrence of the NYSDEC.

### 3.13.7 Location and Description of Alarms

Collection of leachate will be automated and directed by programmable logic controlled (PLC) electric pumps, level switches and high level alarms. These controls will be located at the following locations:

- Existing leachate wells;
- Relocated A/B drain and SM-11 drain sumps;
- Primary and secondary leachate collection sumps in sideriser buildings;
- Condensate tank locations;
- Storage tanks; and,
- Leachate loadout facility sump.

High level alarms at sumps and wells will be connected to control panels and warning lights at each pumping location and the operator control station in the leachate transfer building. These alarms will indicate a possible problem with the pump which will be removed and tested as soon as practicable. The pump will be replaced or repaired if it is determined that it is not operating properly. If it is determined that there is no problem with the pump, the high level alarm will be tested and replaced or repaired where appropriate. Periodic monitoring will be performed to check that both the pump and high level alarm are functioning properly.

The leachate storage tanks will be equipped with an overflow prevention system consisting of a high level alarm connected to a computer that will automatically dial a pre-established paging system to inform the Landfill Operations Manager that the tanks have reached the prescribed level equal to 75 percent capacity. This high level alarm will also be connected to the control panel in the leachate transfer building and the computer will automatically shut off flow to the tank. Flow to the tank will be stopped through the automatic activation of an actuated valve.

### 3.14 Site-Wide Loss of Power

In the event of a power failure affecting the NYSEG service, gasoline or diesel fuel driven electrical generators will be leased and used to supply electricity to the leachate management system, the shop facility and the scale facility. In the event that power from one source is lost, it will be replaced as soon as practicable so that flow monitors, pumps, and pump controllers are operational.

Facility personnel will be directed to respond manually to electrically-dependant facility operations affected by the loss of power and not replaced by back-up generators. Operations that may be temporarily replaced manually include for example, record-

keeping and documentation activities. Other activities may also be temporarily halted in the event of a loss of power to the site.

If the loss of power to the site is not restored within 24 hours, facility management will ascertain the ability of the facility to operate safely and efficiently and make a determination as to whether the facility should be temporarily closed until power is restored.

### 3.15 Receipt of Unauthorized Waste

There are several categories of waste that are not acceptable at the Seneca Meadows facility:

- Hazardous Waste - Wastes defined as hazardous and subject to regulation under 6 NYCRR Part 371. These types of waste include "listed wastes" as well as other materials which can generally be characterized as having one or more of the following properties: ignitability or flashpoint less than 60°C, reactivity (sulfide greater than 500 ppm, cyanide greater than 250 ppm) PCB's of more than 50 ppm, and pH less than 2 or greater than 12.5 SU, and using the Toxicity Characteristic Leaching Procedure (TCLP) test method 1311, the extract from a representative sample of the waste contains the contaminants listed in Table 1 of 40 CFR 261.24 equal to or greater than the value listed in that Table. Industrial wastes are approved on a case by case basis using laboratory analytical information for the aforementioned characteristics as well as a suite of other parameters defined by the NYSDEC "STARS" program for contaminated soils, and 40 CFR Section 261.
- Radioactive Waste - Those radioactive materials which are source, special nuclear or by-product material as defined by the Atomic Energy Act of 1954 and subsequent amendments, and which are regulated under NYCRR Parts 380, 382 and 383. The site operates a radiation detection device at the scalehouse and has a radioactive materials action plan that is implemented if needed. The action plan has been made part of the OMM plan for the site.
- Infectious Waste - As regulated under 6 NYCRR Part 360-10.0. Sharps, liquids and related medical waste not autoclaved are not permitted to be disposed of at the landfill. Sharps must be rendered unrecognizable by grinding, pulverizing or other method prior to acceptance for disposal.
- Sludges - Sewage sludge with a solids content of less than 20% is not accepted.
- Tires - Whole truck and car tires are prohibited from disposal at the landfill.
- Free-Running Liquids - No free-running liquids will be disposed at the Landfill.
- Containers - Intact steel or plastic drums having greater than a 10 gallon capacity that has not had its ends removed or has not been shredded. Containers that have held hazardous waste and are not empty according to 6 NYCRR Part

371.1(f) are also prohibited from disposal. Containers with 5 to 10 gallons capacity will not be accepted for disposal unless the containers have been crushed, compacted or rendered incapable of holding liquid. Small quantities of dry wastes may be containerized for disposal.

- Permitted Haulers - Waste delivered to the facility by haulers not possessing a valid Part 364 waste transport permit will be denied access for disposal.

Should an unacceptable waste load be encountered at the weigh station via insufficient paperwork or visual observation, the vehicle will be denied entry to the landfill.

### **3.16 Release of Toxic or Hazardous Materials**

The previous subsection regarding unauthorized wastes precludes the disposal of hazardous waste at SMI; despite in-place controls, anyone seeing the disposal of potentially toxic or hazardous materials will observe the following rules:

- Report the incident to immediate supervisor;
- Avoid exposure to suspect waste or substance;
- Observe where material was disposed, by hauler, vehicle;
- Note approximate quantity disposed;
- Note appearance and odor of substance;
- Ask hauler about origin of suspect load; and
- Isolate the approximate area of the suspected load.

The employee seeing the infraction occurring will contact the Operations Manager using the two-way radio communications equipment and proceed to the vehicle. The employee will then ask the driver to remain parked while noting vehicle, hauler, and waste load information.

Upon arrival at the tipping area, the Operations Manager will direct the working face staff to temporarily re-locate the active working face to isolate the area. The Operations Manager will record the incident in the daily field log and record information regarding the vehicle, name of hauler, license plate number, SMI waste approval number, Part 364 hauler permit number (including date of expiration) origin of waste, waste description, quantity and whether the waste was loose, containerized, or bagged. Photographs of the material may also be taken to fully document the incident.

Once the material has been safely isolated, the NYSDEC will be notified. Discussions of interim storage arrangements and removal and disposal of the material will occur at this time. In the absence of a hauler, the waste will be loaded into an appropriately sized roll-off container, tarped, and taken to an area for safe storage. If the material is immediately identified as having toxic and/or hazardous characteristics, its immediate disposition will

be arranged according to NYSDEC protocol in conformance with 6 NYCRR Part 373. SMI has contract laboratories available to characterize unknown waste materials for proper handling and disposition, if needed.

In addition to the measures outlined regarding potential toxic or hazardous waste material releases, SMI has prepared an Integrated Contingency Plan (One-Plan). Materials which are stored on-site in quantities large enough to cause potential harm to both personnel and the environment include leachate, landfill gas condensate and petroleum products. Releases of other materials stored in small quantities and routinely used by maintenance personnel includes for example, brake fluid, cleaners, paint thinner etc. These items are secured in metal cabinets and are more readily cleaned up if spilled than the bulk storage of liquid. A multi-purpose spill cleanup kit will be available to equipment maintenance shop personnel for small spills and leaks. If small spills or leaks occur in the equipment maintenance shop, they will be addressed as follows:

- Stop leak and contain spill;
- Clean up spill using appropriate absorbent pads, socks, booms while wearing personal protective gear such as glasses, gloves, etc.; and
- Properly dispose of spill cleanup media.

The cleanup of leachate, landfill gas condensate or petroleum products stored in bulk will be addressed in a similar manner as the cleanup of smaller spills with the exception that absorbent materials used will have greater absorbent capacities and that heavy equipment may also be used to remove potentially contaminated surficial soils. Detailed cleanup procedures for larger spills will be in accordance with the SMI One-Plan.

### **3.17 Primary Liner Leakage**

Secondary containment sumps will draw liquid between the landfill liner and porewater drain to monitor system integrity and discern potential leakage through the primary liner. Liquid collected in the secondary sump will be independently metered at the sideriser station before being combined with flow from the primary leachate collection sump. Based on the specific liner design employed for the cells, and as discussed in the Engineering Report, the initial observed leakage rate will be dependent on flow from three potential sources of water:

- Liner leakage;
- Construction water; and
- Runoff from upgradient areas during liner tie-in.

Construction water is essentially free moisture present within the sand associated with the “as delivered” moisture and direct infiltration of precipitation and/or runoff during sand

placement (and prior to the placement of overlying primary liner). Construction water can contribute significant short term flow quantities to the secondary system.

Runoff from upgradient areas is associated with precipitation that flows into the secondary sand from upgradient areas. This will occur during the tie-in between liner systems from different stages of construction. These tie-ins will require that portions of the liner system be opened up to allow seaming between new and existing secondary/primary liner as well as tie-in of associated leachate collection layers. During these tie-ins, a short-term increase in the apparent leakage rate will generally be observed. These short-term spikes are associated with the inflow of surface water runoff directly into exposed portions of the secondary collection system. Although efforts are made to reduce this infiltration, there are periods when this condition is unavoidable. During these short-term spikes, the liquid removed from the secondary collection system will be monitored on an increased basis (typically daily or every other day) so that short-term increases can be easily tracked against precipitation events. Based on the proposed secondary collection system design, it is anticipated that most of the water that flows into the secondary collection system during tie-in activities will be drained from the sand/geocomposite drainage layer system relatively quickly so that the observed spikes would cease shortly after the liner system tie-in is complete. During liner construction, the observed leakage rate is discussed in weekly construction meetings so that involved parties, including NYSDEC, are informed of the status regarding the observed leakage. Once the liner system tie-in is complete, the leakage rate evaluation is continued so that at least 30 days of data is obtained that demonstrate the leakage rate for the liner system is, or exhibits evidence that it will be, below 20 gallons per acre per day (gpad). In addition to the liner leakage evaluation, a leak detection survey is performed on the liner system to identify potential geomembrane defects. This leak detection survey provides additional assurance regarding the performance of the liner system.

Typically, the initial rate of removal from the secondary collection system, after construction water has been accounted for and the liner system sealed, is well below 20 gpad once the certification report is submitted. However, based upon specific conditions, the short-term construction water flow rate may normally exceed 20 gpad. This condition would not be considered to be a long-term condition and would be evaluated and assessed as part of the certification process.

Once the liner system has been certified and waste placement commences, SMI will record the 30-day average flow rate in the secondary system on a monthly basis. As stated above, during initial waste filling in a given phase, it is possible that the flow rate from the secondary system may exceed 20 gpad for the short term, and these values would be reported to the Department, accompanied by an evaluation of the source of the liquid. Once it has been determined that contributing sources such as construction water have been drained from the system, a 20 gpad action level will be established. Should the steady state rate of flow from the secondary system exceed 20 gpad, SMI will implement the following response protocol.

Within seven days, SMI will notify the NYSDEC in writing of the determination of the leakage rate exceedance as well as other preliminary information available regarding historical performance and gallons removed.

Within 14 days of the determination, SMI will submit in writing to the NYSDEC, a preliminary written assessment of the flow rate. This submission may also include short-term actions that have been either planned or taken to mitigate the leakage.

Within 30 days of the determination, SMI will submit in writing to the NYSDEC a report which may indicate the potential cause(s) for the leakage, the results of applicable investigations undertaken (to the extent practicable) ascertaining the location, size and cause for the leak, a discussion reviewing whether or not waste receipt is to be curtailed or stopped, a discussion as to whether or not waste should be removed from the cell for potential repairs and/or investigations and remedial efforts and if applicable, a detailed approach to further investigating, remediating and/or mitigating the leakage.

On a monthly basis after the thirty-day submission and as long as the secondary system is exhibiting a leakage rate above 20 gallons per acre/day, SMI will continue to submit to the NYSDEC a report outlining the results of remedial efforts undertaken and a detailed approach of remedial efforts that may be planned to mitigate the leakage rate.

### **3.18 Groundwater and Surface Water Contamination**

Landfill liner design and construction as discussed in the Engineering Report and CQA/CQC Plan, the aforementioned leachate management contingencies and the Environmental Monitoring Plans culminate in a comprehensive strategy to prevent contamination of both surface water and groundwater at the facility. Regardless of in-place controls and engineered design features aimed at preventing the contamination of waters, the following subsections describe contingency responses to both surface water and groundwater contamination.

#### **3.18.1 Groundwater Contamination**

A comprehensive discussion of what constitutes a significant increase in the change to existing water quality is contained within the Environmental Monitoring Plan (EMP). A comprehensive groundwater monitoring well array at the Landfill will allow for early on-site detection of potential groundwater contamination. This early detection will allow for the institution of corrective measures.

The EMP describes methods used to monitor changes in groundwater quality, as well as the timing and sequence of responses to discernable changes in water quality. In the event that a significant increase is exhibited by the data and its statistical processing, the NYSDEC will be notified. Contingent upon the nature of the contamination, SMI will implement one or a combination of the following response measures:



- Develop and submit an assessment of corrective measures pursuant to 6 NYCRR Part 360-2.20;
- Install additional monitoring wells to characterize the nature and extent of the groundwater contamination;
- Collect and analyze groundwater samples with greater frequency and for a potentially larger suite of parameters; and
- Lower liquid level sensors for pumps in the vicinity of the contamination to increase leachate removal.

In addition, SMI will advise the local government officials and potentially affected property owners of the notification provided to the NYSDEC, if there is evidence that the groundwater contamination has the potential to leave SMI property.

### **3.18.2 Surface Water Contamination**

As seen in the Engineering Report, the facility will incorporate design features and operating protocol aimed at preventing the surface waters of Black Brook or the Seneca-Cayuga Canal from being impacted by facility operations. Stormwater that comes into contact with waste or daily cover is treated as leachate. Stormwater runoff that does not contact waste (intermediate and final cover areas) will be conveyed from landfill slopes using drainage swales and downchutes to perimeter drainage channels that empty into stormwater detention/sediment basins. SMI currently holds SPDES Multi Sector General Permit (MSGP) for Discharges from Industrial Activities, No. NYR00A672 authorizing controlled discharges of stormwater into Black Brook or the Seneca Cayuga Canal. Prior to discharge from the site, SMI will arrange for the collection and analysis of stormwater pursuant to the procedures identified in the EMP.

An additional design feature incorporates dual containment on leachate conveyance pipelines having the capability for leak detection monitoring to help ensure system integrity. Additional measures provided to prevent surface water contamination include facility controls such as posted speed limits, leachate collection high-level alarms and sedimentation controls in stormwater conveyance channels (e.g., check dams).

In the event that surface water contamination is detected, SMI will immediately implement response measures which would potentially include the following:

- Re-analysis of surface water to verify laboratory results;
- Follow-up sampling in accordance with the MSGP as applicable
- Discontinuance of stormwater discharge events that may be the cause of the surface water contamination;
- Site reconnaissance to investigate and determine the causes(s) for the contamination;

- Characterization of the extent and nature of the contamination; and
- Removal of contaminated water and/or sediment using spill response equipment consisting of absorbent pads and booms and other required equipment.

Within seven days of confirmed facility-related impact to surface waters, notify the NYSDEC and provide copies of data confirming contamination, as well as interim measures that have been taken and long-term measures that are proposed to mitigate and/or prevent further contamination.

## LIMITATIONS

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The work product included in the attached was undertaken in full conformity with generally accepted professional consulting principles and practices and to the fullest extent as allowed by law we expressly disclaim all warranties, express or implied, including warranties of merchantability or fitness for a particular purpose. The work product was completed in full conformity with the contract with our client and this document is solely for the use and reliance of our client (unless previously agreed upon that a third party could rely on the work product) and any reliance on this work product by an unapproved outside party is at such party's risk.

The work product herein (including opinions, conclusions, suggestions, etc.) was prepared based on the situations and circumstances as found at the time, location, scope and goal of our performance and thus should be relied upon and used by our client recognizing these considerations and limitations. Cornerstone shall not be liable for the consequences of any change in environmental standards, practices, or regulations following the completion of our work and there is no warrant to the veracity of information provided by third parties, or the partial utilization of this work product.

# TABLES

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**TABLE 3-1**  
**SENECA MEADOWS, INC. LANDFILL**  
**EMERGENCY TELEPHONE NUMBERS**

Fire Department	
Seneca Falls	(911) (315) 568-2796
Waterloo District	(911) (315) 539-2161
Police Department	
Waterloo Police	(911) (315) 539-2022
State Police	(911) (315) 539-3976
Seneca County Sheriff	(911) (315) 220-3250
Ambulance Service	
North Seneca	(911) (315) 539-5001
Medical Services	
Lifecare Medical Associates, PC	(315) 539-9229
Geneva Urgent Care	(315) 781-2000
Hospital Emergency Room	
Geneva General Hospital	(315) 787-4000
NY Regional Poison Control Center	(800) 222-1222 (315) 464-5424
Chemical Emergency Advice	(800) 424-9300
NYSDEC	
Regional Office	(585) 226-2466
Spill Reporting	(800) 457-7362
EPA National Response Center	(800) 424-8802
RCRA Hotline	(800) 424-9346
UFPO (Dig Safety New York)	(800) 962-7962
Buckeye Petroleum Pipeline	(800) 331-4115
AT&T	(315) 696-8926

**TABLE 3-2**

**SENECA MEADOWS, INC. LANDFILL**

**SAFETY EQUIPMENT AVAILABLE TO PERSONNEL**

Personnel Safety Equipment:

- Hard hats
- Safety glasses
- High visibility vests
- Steel toe boots
- Splash protection (e.g., Tyvek)
- Gloves
- Hearing protection
- Respirators
- MSA SCBA
- Safety Harnesses and Fall Arrestors

Monitoring Equipment:

- GEM 2000 Plus LanTech Multi-Gas Meter
- GEM 2000 LanTech Multi-Gas Meter
- Mini RAE 2000 PID
- Mini RAE 3000 PID
- MultiRae Lite Multi-Gas Meter
- V-RAE Multi-Gas Meter
- PhotoVac FID
- Radiation detector
- Explosive Gas Meters – (See V-Rae and MultiRae Lite, above)
- Compound specific gas detector (colorimetric) tubes
- Automated External Defibrillator
- Solinst Water Meters

Other Equipment:

- Fire extinguishers
- Flashlights
- Portable generators
- Safety shower
- Caution barricades
- Portable pumps and hoses
- Two-way radios

# FIGURES

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# VEHICLE / PROPERTY ACCIDENT REPORT

WASTE CONNECTIONS INC.  
Connect with the Future®

Reported to ESIS  ESIS CLAIM # \_\_\_\_\_

TYPE OF ACCIDENT (COMPLETE BOXES):	<input type="checkbox"/> AUTOMOBILE LIABILITY	<input type="checkbox"/> DAMAGE TO WCI PROPERTY/THEFT	<input type="checkbox"/> DAMAGE TO WCI VEHICLES	<input type="checkbox"/> GENERAL LIABILITY
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WCI District #: 

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District Name: \_\_\_\_\_

Vehicle Accident No.:

										Unique Identifier (A,B,C, etc)
Year			Month		Day		(Use Date of Loss)			

Time am/pm	Location of Incident	Claimant Name			
City/State		Street Address			
WCI Vehicle Year/Make/Type/VIN		City/State/Zip			
Employee Name		Telephone: Work		Home:	
Home Phone	Was Employee Injured? Yes <input type="checkbox"/> No <input type="checkbox"/>	Vehicle Year	Vehicle Make	License Plate #	
Employee Supervisor	Supervisor Phone Number	Insurance Company			
Date Form Completed _____/_____/_____	Person Completing Form	Passenger Name(s)			
Name of Witness(es)		Street Address(es)			
Address		City/State/Zip			
Work Phone _____ Home Phone _____		Telephone: Work		Home:	
Were Photos Taken? Yes <input type="checkbox"/> No <input type="checkbox"/> If Not, Why Not? _____		Registered Owner of Claimant Vehicle			
Reported To Police? Yes <input type="checkbox"/> No <input type="checkbox"/> Report # _____		Street Address			
Which Agency _____		City/State/Zip			
Citation Issued? Yes <input type="checkbox"/> No <input type="checkbox"/> Citation # _____		Telephone: Work		Home:	
WCI Investigator _____ Phone # _____		Any Third Party Claimant Injuries? Yes <input type="checkbox"/> No <input type="checkbox"/>			

**DESCRIPTION OF ACCIDENT –**  
Auto Liability: Include area of damage to the vehicle / General Liability: Include area of damage to property

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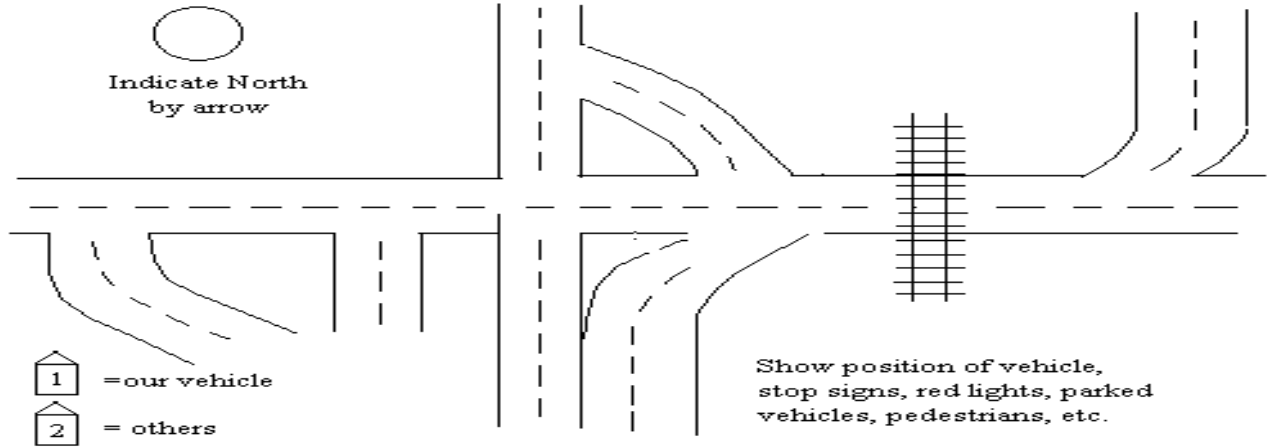
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### Diagram of Incident



<b>LENGTH OF SERVICE</b>  <div style="display: flex; justify-content: space-around;"> <div style="border: 1px solid black; width: 30px; height: 30px;"></div> <div style="border: 1px solid black; width: 30px; height: 30px;"></div> </div> <p style="text-align: center;">Months                  Years 00 - No Employee Involved/Unknown</p>	<b>LOCATION</b>  <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div> <p>1 Residential Area 2 Commercial Area 3 Highway/Expressway 4 Landfill 5 WCI Property</p>	<b>PREVENTABLE BY WCI EMPLOYEE INVOLVED</b>  <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div> <p>1 Yes 2 No 3 Alleged 4 Waiting for Review 5 Probably Did Not Do/ Paid for Bus. Reasons 6 No Employees Involved/Unknown</p>	<b>TIME OF DAY</b>  <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div> <p>1 6-9 AM 2 9-12 Noon 3 12-3 PM 4 3-6 PM 5 6-9 PM 6 9-12 Midnight 7 12-3 AM 8 3-6 AM 9 Cumulative/Progressive 00 Unknown</p>
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<b>LIGHT</b>  <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div> <p>1 Daylight 2 Dawn/Dusk 3 Dark – No Light 4 Dark – Artificial Light 5 Not Applicable/ Unknown</p>	<b>WEATHER</b>  <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div> <p>1 Clear 2 Raining 3 Snowing 4 Sleet 5 Fog/Smog 6 Other _____ 7 Not Applicable/Unknown</p>	<b>VEHICLE TYPE</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">                 1 REL 2 FEL 3 Side Loader 4 Roll-Off 5 Container Delivery 6 Satellite Collection 7 Tractor/Trailer 8 Sweeper 9 Tanker 10 Vacuum Truck             </td> <td style="width: 50%; border: none;">                 11 Landfill Equipment 12 Heavy Equipment 13 Pickup Truck 14 Light Truck 15 Automobile 16 Other (Specify) 17 Power Pull Truck 18 Toilet Service Truck 19 Flat bed 1 ton 20 Flat bed 3 ton 21 Not Applicable             </td> </tr> </table> <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div>	1 REL 2 FEL 3 Side Loader 4 Roll-Off 5 Container Delivery 6 Satellite Collection 7 Tractor/Trailer 8 Sweeper 9 Tanker 10 Vacuum Truck	11 Landfill Equipment 12 Heavy Equipment 13 Pickup Truck 14 Light Truck 15 Automobile 16 Other (Specify) 17 Power Pull Truck 18 Toilet Service Truck 19 Flat bed 1 ton 20 Flat bed 3 ton 21 Not Applicable
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<b>ACCIDENT TYPE</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">                 1 Head On 2 Turning Accident 3 Sideswipe – WCI Hit Other 4 Sideswipe – Other Hit WCI 5 Rear-End – WCI Hit Other 6 Rear-End – Other Hit WCI 7 Hit Overhead Object 8 Hit Stationary Object 9 Hit Parked Vehicle 10 Backing 11 Right Angle 12 Towing/Pushing 13 Intersection             </td> <td style="width: 50%; border: none;">                 14 Object Fell/Flew From Truck 15 Hit Pedestrian 16 Chemical/Material Spill 17 Ran Off Road 18 Jackknife 19 Rollover 20 WCI/WCI Vehicle Collision 21 Hit/Damage to Curb, Parking Lot, etc. 22 Damage to Lawn/Water Pipe/Sprinkler 23 Roll Away Vehicle 24 Other _____             </td> </tr> </table> <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div>	1 Head On 2 Turning Accident 3 Sideswipe – WCI Hit Other 4 Sideswipe – Other Hit WCI 5 Rear-End – WCI Hit Other 6 Rear-End – Other Hit WCI 7 Hit Overhead Object 8 Hit Stationary Object 9 Hit Parked Vehicle 10 Backing 11 Right Angle 12 Towing/Pushing 13 Intersection	14 Object Fell/Flew From Truck 15 Hit Pedestrian 16 Chemical/Material Spill 17 Ran Off Road 18 Jackknife 19 Rollover 20 WCI/WCI Vehicle Collision 21 Hit/Damage to Curb, Parking Lot, etc. 22 Damage to Lawn/Water Pipe/Sprinkler 23 Roll Away Vehicle 24 Other _____	<b>ACCIDENT CAUSE/WCI VEHICLE</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">                 1 Fell Asleep at Wheel 2 Failure to Check Mirror 3 Following Too Close 4 Failure to Signal Intentions 5 Speed Too Fast for Conditions 6 Disregard Traffic Sign/Signal 7 Improper Passing 8 Improper Turning 9 Improper Backing 10 Improper Traffic Lane 11 Improper Parking 12 Did Not Look Left/Right/Left 13 Left Forks/Lids, Rails/Box Up             </td> <td style="width: 50%; border: none;">                 14 Misjudged Clearance 15 Failure to Secure Load 16 Unsafe Loading/Unloading 17 Mechanical Problem 18 Tire Blowout 19 Failure to Lockout/Tagout 20 Other – description: _____             </td> </tr> </table> <div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div>	1 Fell Asleep at Wheel 2 Failure to Check Mirror 3 Following Too Close 4 Failure to Signal Intentions 5 Speed Too Fast for Conditions 6 Disregard Traffic Sign/Signal 7 Improper Passing 8 Improper Turning 9 Improper Backing 10 Improper Traffic Lane 11 Improper Parking 12 Did Not Look Left/Right/Left 13 Left Forks/Lids, Rails/Box Up	14 Misjudged Clearance 15 Failure to Secure Load 16 Unsafe Loading/Unloading 17 Mechanical Problem 18 Tire Blowout 19 Failure to Lockout/Tagout 20 Other – description: _____
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<b>GENERAL LIABILITY</b> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">                 1 Claimant Slipped/Fell on WCI Property 2 Claimant Slipped/Fell on Trash 3 Container/Compactor Injured Claimant 4 Claimant Injured in Container/Truck 5 Oil/Hoist Oil Leak or Spray 6 Container Damaged Property             </td> <td style="width: 50%; border: none;">                 7 Object Flew From Highway 8 WCI Equipment or Unlicensed Vehicle Damaged Claimant's Property/Person 9 Damage Done to Property Over a Period of Time 10 Damage or Injury Caused by WCI Product 11 Other _____             </td> </tr> </table>	1 Claimant Slipped/Fell on WCI Property 2 Claimant Slipped/Fell on Trash 3 Container/Compactor Injured Claimant 4 Claimant Injured in Container/Truck 5 Oil/Hoist Oil Leak or Spray 6 Container Damaged Property	7 Object Flew From Highway 8 WCI Equipment or Unlicensed Vehicle Damaged Claimant's Property/Person 9 Damage Done to Property Over a Period of Time 10 Damage or Injury Caused by WCI Product 11 Other _____	<div style="border: 1px solid black; width: 40px; height: 30px; margin: 0 auto;"></div>
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