

K.B Recycling, Inc.



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Final Metro Approved Operations Plan

Submitted to



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SECTION I - INTRODUCTION

K.B. Recycling, Inc. is a material recovery and processing facility (MRPF). It includes structures, equipment and operating personnel designated and trained to operate the facility. K.B. Recycling, Inc.'s management team will operate the MRPF to achieve maximum waste flow throughput efficiently and safely. Clearly, flexibility will be the watch word of the operating philosophy of the KB team. Close, coordinated relationships will be developed and nurtured between all of the stakeholders at the MRPF. Particular management focus will be placed on the following areas:

- A safe and healthy working environment for employees and customers;
- Minimization of traffic queues at both public and commercial ingress/egress areas;

This particular recycling facility is distinguished from scrap recycling facilities and waste recycling facilities that accept a mixed waste stream of non-recyclable and recyclable wastes. Facilities included in this sub-sector would include facilities that receive source-separated, recyclable materials primarily from industrial and-residential sources. The recyclable materials in this sub-sector can be characterized as common consumer products such as paper, newspaper, cardboard, plastic containers, glass bottles, aluminum and tin cans. These facilities commonly accept a mix of recyclable materials and reject non-recyclable materials from the source.

K.B. Recycling receives residential, commercial and industrial recyclable dry waste materials, supplied by affiliated collection companies, other haulers, and source separated recyclables received from the public. This material may consist of mixed solid waste with a 25% or higher recyclable content, source separated recyclables and curbside collected recyclable materials.

Material received at K.B. Recycling is processed for recyclables with unrecoverable waste materials shipped to Metro other approved landfills.

The Operations Plan serves a critical function in integrating structures, equipment, and the work force. The Plan is expected to be revised as operational experience suggests better ways to utilize the facility and accomplish the required work.

A. PURPOSE OF THE OPERATIONS PLAN

The main body of this plan describes the general operating procedures for the MRPF facility. The purpose of the Plan is to:

1. Acquaint operations and maintenance personnel with the facility's overall capabilities.
2. Describe individual job responsibilities for the operations and maintenance personnel.
3. Provide personnel with the necessary instructions for proper operation and maintenance of the facility under both normal and unusual conditions.

The Plan is intended to be a guide for personnel who have some familiarity with the recycling and processing of solid waste materials. It should be emphasized, however, that the Plan cannot be substituted for experience, nor is it intended to cover all operational possibilities.

A.1 USER GUIDE

In order to best serve users of the Plan, it is recommended that all key facility personnel become familiar with the Plan's contents, format, and organization, as follows:

SECTION I is an introductory section. It describes the function and use of the Plan, and provides background information on the relationship of the facility to the overall material processing system.

SECTION II describes general facility operating requirements and procedures, for functions not directly related to waste processing, and recycling.

SECTION III contains a detailed description of each facility component related to material processing: Specific operation and control features are also described.

SECTION IV deals with equipment and its maintenance.

SECTION V describes the duties of personnel working at the facility. Work schedules, job training and a listing of the staffing structure are also discussed.

SECTION VI covers procedures to be followed under general contingency conditions of work stoppage, bad weather, and equipment failure.

SECTION VII covers procedures to be followed under emergency contingency conditions of fire, explosion, and suspicious/hazardous waste spills.

SECTION VIII describes the system of maintaining operation and equipment records and the reporting system that provides this information to K.B. Recycling's Corporate Office.

SECTION IX discusses safety policy and procedures to be followed at the facility.

A.2 OVERVIEW OF FACILITY FUNCTION

K.B. Recycling, Inc., is a registered company in the State of Oregon. K.B. Recycling includes the main processing building, scale house, office, equipment, paving and landscaping. K.B. Recycling holds a Solid Waste License issued by the Metropolitan Service District (Metro) and is authorized by the Oregon Department of Environmental Quality (DEQ) to accept commercial and industrial solid wastes, and source separated recyclable materials. No other wastes are accepted without written approval of Metro and/or the DEQ. K.B. Recycling is not permitted to accept prohibited or hazardous wastes, except for small amounts that may be incidental to the materials received and within state and federal parameters.

The principal function of the K.B. Recycling facility is to receive, process and/or separate recyclable materials and then transport them to other destinations for additional processing and/or disposal. The facility will receive loads with a high percentage of recyclable materials, source separated materials, and mixed waste.

Mixed dry waste containing recoverable quantities of recyclables will be floor sorted by trained employees. Recyclables are baled or otherwise prepared for shipment to market and non-recyclable

materials will be compacted or shipped loose to an approved solid waste disposal facility.

In the event any hazardous waste is discovered and the generator or hauler cannot be identified, the material will be removed from the facility by a licensed contractor and shipped directly to an authorized storage or disposal site. If the generator is identified, he or she will have the option of removing the material. If he or she does not choose to, or cannot remove the waste, K.B. Recycling shall contract such removal at the expense of the generator and/or hauler.

K.B. Recycling currently accepts mixed recyclables from residential and commercial collection programs, recyclable material from the public, mixed dry waste from commercial sources. Glass, plastic, newspaper, mixed paper, high grade paper, corrugated cardboard, wood, drywall, and non-ferrous metals are prepared and shipped off site. Non-recyclable waste material from the recycling process is shipped to a permitted disposal facility. The Site Plan shows details of location and layout of the facility, (Figure 1).

Figure 1- KB Recycling Site Plan 2017



SECTION II - GENERAL FACILITY OPERATING REQUIREMENTS

This section provides descriptions of general operating requirements and specific procedures necessary to meet those requirements apart from the solid waste handling functions of the facility. Waste handling operations are discussed in Section III.

A. SITE DEVELOPMENT AND STRUCTURES

The facility is composed of a 60,000 square foot, recovery building with areas designated for waste processing. It also includes an outside receiving, processing and storage area for public drop-off of recyclables, an office, a scale house with two scales, paved and landscaped areas. Figure 1 is the site plan as constructed.

The general flow of traffic onto the site is direct to designated drop-off areas. Curbside traffic and commercial traffic will be to the northern portion of the main building. Self-haul will be at the south side of the building. Public drop off is just inside the main gate toward the front of the building.

B. ACCESS AND CIRCULATION/TRAFFIC CONTROLS

The facility entry from Clackamas Street provides two lanes; one across the inbound eighty-foot (80') truck scale with corresponding scale house; and one bypass lane, for emergency equipment access. All traffic will exit via one of the two lanes; one across the outbound eighty-foot (80') scale, and the by-pass lane.

C. PARKING

Employee and visitor parking is provided along the east and north end of the site. This parking lot includes handicap parking.

D. STORM AND SANITARY DISPOSAL

The facility produces two different non-process wastewater streams which are handled as follows:

1. Sanitary sewer water, including drainage from inside the processing building, toilets, and washbasins, is discharged to the Clackamas County Service District No. 1 sanitary sewer system.
2. Storm Drains from on-site pavement and roof areas.

Clackamas County has determined that there are wetlands on the site. All of the identified wetlands have been designated low value (total social value score is 2.08). Because of their low value, the wetlands are not considered significant by the County and fill or removal in the wetlands does not require County permits. Jurisdiction over these wetlands falls under the authority of the Oregon Division of State Lands (DSL) and the U.S. Army Corps of Engineers (USACOE). DSL has declined to take jurisdiction over the wetlands due to their low quality and artificial nature. In order to accommodate economic use of the property, avoidance of wetlands impacts is not possible. Past uses of the property included placement of an asphalt layer that was subsequently buried by the

placement of various types of fill. The site was abandoned in the mid-1970's and since that time water has collected in depressional areas and wetland plants have colonized these areas. Seven wetlands were delineated within the parcel by the applicant. Total wetland acreage within the parcel is 0.96 acres.

Approximately 1 acre of combined emergent, scrub-shrub and forested wetland will be created in the southwestern corner of the site (see Mitigation Plan). This created wetland will replace the 0.96 acre of low quality/value impacted wetlands that are dispersed in seven (7) separate pods throughout the project site. Of this 0.96 acre, approximately 0.12 acre is within the area of the proposed 1 acre created wetland but is of such low quality that it will be excavated and incorporated into the proposed larger and higher quality PEMIPSS/PFO wetland system. In addition to providing wetland mitigation, this 1 acre facility will be engineered to act as the stormwater detention facility for the project site.

There are no ponds, lakes or streams on the project site. However, due to inadequate drainage conveyance infrastructure adjacent to and within the site, there is seasonal flooding in the immediate area. The most noticeable problem is standing water that collects four to five times a year in the area of southeast Clackamas Road between southeast 98th avenue and southeast Industrial Way. County public works personnel must regularly barricade Clackamas road as standing water depth typically reaches 12 inches. The cause of this problem appears to be the limited capacity of the ditch on the east side of the Southern Pacific railroad and north of highway 212, into which the area drains.

Correction of the drainage problems at the site called for regarding and installation of improved stormwater conveyance and water quality enhancement systems. The approved infrastructure improvements consist of the following elements:

1. Pretreatment biofiltration swales - Two (2) one hundred lineal foot sections have been constructed on the southern edge of Clackamas road. Both of these elements run parallel to Clackamas road and intercept stormwater runoff from the road surface and up-gradient development. These intercepted flows outfall to a stormwater sediment trapping manhole prior to being conveyed to the combination constructed wetland/stormwater detention facility located in the southwest corner of the project site.

One (1) two hundred lineal foot section has been constructed on the western edge of southeast 98th avenue effectively spanning the length of the eastern border of the project site. This facility will intercept stormwater runoff from 98th Avenue if required. As a condition of development, a half street improvement has been made to southeast 98th Avenue corresponding to the length of the property. Included in the street, and curb & gutter improvements, are catch basin and pipe improvements that connect to the County's public conveyance that is in place in 98th Avenue to the south of the project site. It is anticipated that the in-street drainage improvements will divert flows to the existing public drainage conveyance system.

One (1) two hundred fifty foot section has been constructed on the southern edge of the property running perpendicular to southeast 98th Avenue. This facility will intercept stormwater runoff from the parking lot on the project site. Flows that are intercepted by this facility will outfall to a water quality enhancing manhole (with sediment trapping features) prior to being conveyed to the combination constructed wetland/stormwater detention facility located in the southwest corner of the project site.

One (1) fifty lineal foot section has been constructed directly adjacent to the inlet of the combination constructed wetland/stormwater detention facility discussed above. This facility will intercept the pretreated flows from the three biofiltration swales itemized above along with flows conveyed from up-gradient development. Flows that outfall to this facility will be further detained and pretreated prior to outfalling to the constructed wetland/stormwater detention facility. A water quality enhancing manhole has been constructed on the outlet side of this facility. Flows passing through this structure will then outfall directly to the detention facility.

2. Stormwater pipe conveyance - In order to convey detained and pretreated stormwater from up-gradient development and from the two (2) 100 lineal foot biofiltration swales that have been constructed on the southern edge of Clackamas road, approximately 600 lineal feet of 30" concrete pipe was installed on the project site. As discussed above, flows from up-gradient development and the two Clackamas road swales will first enter a storm sediment trapping manhole. These flows will outfall from this structure directly into the 30" pipe. Once in the pipe, these flows will be conveyed to the southwest corner of the project site where they will converge with flows from the 250' swale that collects stormwater runoff from the project parking lot. This will be the terminus of the pipe conveyance. At the terminal end of the pipe, a second water quality enhancing manhole has been constructed (with sediment trapping features). All of the flows that enter this structure will outfall to the 50' biofiltration swale that is connected to the combination constructed wetland/stormwater detention facility.
3. Constructed wetland/stormwater detention facility - As discussed above, Approximately 1 acre of combined emergent, scrub-shrub and forested wetland has been created in the southwestern corner of the site. In addition to providing wetland mitigation, this 1 acre facility has been engineered to act as the stormwater detention facility for the project site. Pretreated stormwater will enter this engineered facility at an inlet elevation of approximately 103.5' (at the northeast corner), and will outfall from the facility at an outlet elevation of approximately 102.5' (at the southwest corner).

Once the treated stormwater leaves the project site (i.e., from the outlet of the constructed wetland/stormwater detention facility) it will flow into the existing ditch on the east side of the Southern Pacific Railroad track. This ditch has been improved by K.B. Recycling to accommodate 25-year future conditions design flows (calculated at 18cfs at peak). This ditch follows the railroad track south where it eventually outflows to the confluence of the Cow Creek drainage.

E. NUISANCE CONTROL

K.B. Recycling has contracted with a pest control specialist to inspect the facility and place vector control devices throughout the facility, on a monthly basis. If, in the course of normal operations, insects, birds, rodents, or other animals become a nuisance or health and safety hazard, the facility will increase the means of vector control, and take such action as required to minimize such nuisances.

Neither odor nor odor control have been issues of concern at K.B. Recycling. The facility follows procedures identified in the K.B. Recycling Odor Control Plan, to minimize and control odors at the facility .

F. NOISE CONTROL

If noise complaints are received, the Facility Manager will conduct an investigation and develop a mitigation plan, if necessary.

G. LITTER CONTROL

The facility is surrounded by fencing or shrubbery that serves as a means to limit litter from leaving the site. On-site litter control is performed by facility personnel on a daily basis. Regular inspections are performed with particular attention to windblown material near perimeter areas. Litter is to be collected and disposed of daily.

H. HOURS OF OPERATION

The facility is open to the public for waste receipt from 8:00 a.m. to 3:30 p.m. on weekdays, except on New Year's Day and Christmas Day, at which time the facility is closed. The facility may operate Thanksgiving Day, at reduced hours. Facility hours are subject to change.

I. FACILITY TOURS

Local enforcement or regulatory agency personnel may visit the facility from time to time to monitor facility operation and procedures. All visiting personnel will be escorted by the Facility Manager, Site Supervisor, or Corporate Environmental Compliance Manager during these visits and will be registered at the office.

Other visitors wishing to tour the facility are requested to do so by appointment only. Those without prior appointment may be allowed to visit without an appointment by authority of the Facility Manager. All visitors are required to register at the office. Visitors are not allowed to take photographs without prior permission.

J. LANDSCAPE AND GROUNDS

K.B. Recycling will maintain site landscaping with its own personnel, and as required, contract with outside landscape contractors to ensure all landscape areas remain healthy and attractive for the future.

SECTION III - WASTE HANDLING OPERATIONS

A. GENERAL

This section describes the operation and control of each component in the facility that is directly related to solid waste handling. More detailed information about specific pieces of equipment can be found in the appropriate manufacturer's manual. Maintenance schedules and procedures are briefly addressed in Section W. Detailed maintenance information is contained in the individual equipment operation and maintenance manual(s).

B. THE WASTE STREAM

The following two categories of waste are expected to arrive at the facility:

1. Source Separated Recyclable Material
2. Industrial and Commercial Mixed Dry Waste

B.1 ACCEPTABLE WASTE

Acceptable waste means any and all recoverable commercial and industrial solid waste.

B.2 UNACCEPTABLE WASTE

Unacceptable waste means:

1. Hazardous waste as defined in ORS 466.005.

B.3 Chemicals, liquids, explosives, infectious materials and other materials which may be hazardous or difficult to **manage**.

2. Bulky combustible material, car bodies, dead animals, tires, sewage sludge's, septic tank pumpings or hospital wastes,
3. Mixed solid waste from the public.
4. Putrescible (wet) waste.

In general, unacceptable waste means liquids, hazardous waste, radioactive materials, explosives, pathological or infectious waste, oversize items, bulk loads of tires, or any materials that would likely pose a threat to health or safety, or that might cause damage or adversely affect facility operation, and other material specifically prohibited by state or federal statute(s).

C. MATERIAL RECEIVING

C.1 INCOMING MATERIAL

The facility is equipped with two scales and a scale house. Normal operation calls for the scale house to be open during all hours that material is being accepted. Customers will be charged on the basis of weight. Customers with a K. B. charge account are identified by an account number. These account numbers are keyed into the computerized weighing system, which registers the vehicle's gross weight and then stores the information for later use. When the vehicle is empty on the outbound scale, the account number is again keyed into the system and a tare weight is computed.

The computer automatically calculates the net weight and fee by subtracting the tare weight from the gross weight and multiplying it by the tonnage rate. A weight ticket is then printed with the weight information, date, time of day and total fee. If, for some reason, an account customer does not weigh empty, they will be contacted and requested to come back to establish an empty weight. This tare weight is then used to determine a net weight and, thus, a tip fee for the transaction. In the event someone jumps the scale or avoids being weighed out, a charge for that load will be based on the gross weight.

In general, small loads (less than 800 pounds), arriving at the facility in cars, pick-up trucks or cars/pick-ups with trailers are charged based on a minimum fee. K.B. Recycling will post a standard fee for different types of loads based upon the minimum. The Cashier will enter the material type in the computer and a ticket will be automatically generated indicating the total charge, or payout, to the customer.

Weight-based customers paying by cash or check are weighed into the system. At the time the customer is on the inbound scale, a gross weight is captured and a deposit amount is received by the Cashier. The deposit amount is an estimate of the actual disposal fee. After off-loading, this customer is directed to the scale to obtain a tare weight and settle payment before exiting. If, for some reason, a cash customer does not weigh out, the gross weight is assumed to be the net weight. This weight is then entered into the computer and a ticket is printed as if the transaction were complete.

If the scales are bypassed by a licensed hauler they will be called to come back and be weighed to establish a tare weight, unless a tare weight has previously been recorded for that vehicle. The driver will be notified of this as he/she enters the facility.

If a load contains unacceptable waste the vehicle operator or owner will be directed to remove the material from the Facility. If the truck delivering the unacceptable waste has off-loaded and has left the facility, K.B. Recycling will contact the person who delivered the unacceptable materials, to remove them. If the owner of the unacceptable waste cannot be identified, K.B. Recycling will be responsible for proper disposal of the waste, at its own expense.

At the scale house, loads with recyclable materials will be directed to the appropriate off-loading area.

C.2 SCALE HOUSE

The Scale house area consists of a computer terminal, phone and an attendant building. The building has a work area and locking storage area. The scale is attached to the computer network through digital indicators. The PC scale software program is loaded on the network and can be used to communicate information to the Corporate office. This program stores all pertinent customer data and uses the data to calculate net weight, tipping fee, and to print weight tickets.

C.3 COMMERCIAL HAULERS

Commercial haulers and all large trucks will be directed to the processing building or the specific commercial off-loading area. Activity at these areas will be controlled by a designated spotter or operator working in that respective area.

C.4 SELF-HAULERS (PUBLIC)

Self-haulers will be directed, by the scale operator, to a specific off-loading area. At the Recycling drop-off area, signage will direct incoming vehicles to appropriate locations depending on the nature of the recyclable materials. Vehicles which have deposited their entire load of recyclable materials will be directed to exit the facility. Scavenging is not permitted at the K.B. Recycling facility.

C.5 LOAD CHECKING

A Spotter/Recycle Technician observes the unloading of all material. If suspicious and/or hazardous wastes are identified they will be returned to the hauler.

C.6 FACILITY PROCESS FLOW

Figure 1 illustrates the general flow of vehicles through the K.B. Recycling property.

D. FACILITY FLOOR OPERATIONS

Material entering the facility is directed to one of the following areas:

1. OCC tipping area (clean)
2. Mixed fiber area
3. Tin, aluminum, glass, and plastics (tag) area
4. Public recycling area
5. Mixed dry waste tipping area

D.1 MIXED COMMINGLED CURBSIDE LINE

This line is used in order to high grade the quality of fiber by removing undesirable materials. Mixed waste paper is loaded onto a ground level conveyor, with a skid steer loader. The cardboard is removed mechanically with an OCC separator. Pickers are used to clean up any remaining

undesirable materials. The remaining mixed waste flows off the line to a trailer where it is shipped offsite to a broker or mill.

D.2 MIXED COMMINGLED CURBSIDE LINE

The curbside line is used to separate #8 ONP from the other commingled curbside materials using disc screen technology. Material is fed onto an incline conveyor and up to an OCC disc screen separator where OCC is extracted from the ONP, MWP, plastics, glass (if any), tin and aluminum. This material is fed to the main ONP Disc Screen which separates ONP from MWP, TIN, PLASTICS, GLASS (if any) and ALUMINUM. Here, mechanical magnets separate TIN and manual sorting by product type occurs for the remaining materials. Finally, the sorted material is baled for shipment to both domestic and foreign markets. ONP is directed to an AMFAB compactor for final compaction and shipment.

D.3 BALER

The baler is fed by the baler infeed conveyor. The infeed conveyor receives material from the mixed waste paper processing line, directly: from two tipping floor areas. The baler is operated manually from the control panel located near the infeed hopper of the machine. The baler will continue to cycle taking successively shorter strokes as the bale is built. When the bale reaches maximum size the baler automatically ejects and wire straps the bale. The baler returns to its starting point and begins another bale. Due to the different characteristics and densities of materials, an operator usually monitors this procedure.

D.4 COMPACTOR

The compactor is fed by the number one reject line. All activation of the compactor is done manually by the operator. After activation the compactor automatically compacts the reject material. After the ram has retracted, the operator will again activate the conveyor and repeat the procedure until a bale is completed. The cycles are continued until the unit has reached its predetermined weight. At that time, the load is ready for extrusion into a trailer or shipping container. The operator will shut down the compactor feeding operation and eject the compacted bale into the trailer or shipping container. The compactor produces a bale weighing from 7 to 25 tons. One bale is loaded into each trailer or shipping container.

D.5 CONSTRUCTION & DEMOLITION (C & D) WASTE LOADING

The waste loads after floor sorting of C & D materials are loaded into trailers inside the southern end of the building for transportation to an approved landfill site.

D.6 MISCELLANEOUS MATERIALS HANDLING

K.B. Recycling receives various materials delivered in bulk. Drop boxes, bins or concrete bunkers for storage of recyclables are provided. Drop boxes, bins or concrete bunkers typically store steel, or TAG materials.

K.B. Recycling also maintains a public recyclable drop-off area. The area provides for full service recyclables collection and is located just inside the main gate at the facility.

D.7 USED OIL STORAGE

K.B. Recycling has a 500 gallon used oil storage tank with a roof and a secondary spill containment pan underneath. Commercial haulers bring in used oil in small curbside containers (2 gallons or less). After weighing in at scales they proceed to oil storage tank, drain oil into tank and dispose of empty containers in garbage bins beside oil tank. This tank will be emptied on a regular basis. Surrounding area will be regularly cleaned and maintained by K.B. Recycling employees.

E. TRAILER/SHIPPING CONTAINER PROCEDURES

Full containers or trailers with outbound recyclable materials may be stored in the area east of the entry gate.

Putrescible materials are shipped to a Metro approved transfer site within 24 hours of receipt.

E.1 MATERIAL HAULING AND TRUCKING

K.B. Recycling utilizes its own rolling stock and subcontractors for hauling of process recyclables, reject materials, mixed paper, and various other materials. Loading operations generally take place in their respective areas where forklifts load trucks from ground level or the loading dock. A tractor is used to spot trailers.

E.2 TRAILER/SHIPPING CONTAINER PROCESSING

All trailers and shipping containers will be weighed entering and leaving the facility, to establish the net weight shipped. In the event a truck is overweight, the Cashier will notify the truck driver and the truck will be required to re-enter the facility and have the load adjusted.

F. CONTROL OF WASTE MATERIALS

The K.B. Recycling facility will not knowingly handle waste types that are prohibited by federal, state or local regulations and policies. These wastes include:

1. Hazardous wastes as defined in ORS 466.005.
2. Chemicals, liquids, explosives, infectious materials and other materials which may be hazardous or difficult to manage.
3. Bulky combustible material, car bodies, dead animals, tires, sewage sludge's, septic tank pumpings or hospital wastes.
4. Mixed solid wastes from the public.

The control of waste types is carried out at the facility in several ways. The first responsibility for controlling prohibited waste lies with the generator. This control is initiated through education and is the responsibility of the area collectors and Clackamas, Multnomah, and Washington County governments, and the Oregon DEQ. The second line of control is through inspection by the collector and transporter. The spotter visually inspects all loads and denies the off-loading of prohibited waste types. If unacceptable waste is detected, it will be logged on the Unacceptable Waste Log, giving the item numbers, date discovered, description of material and generator, if known. This is especially important with regard to self-haul material, which can be highly variable.

Spotters and/or operators give a final inspection after the load is unloaded in its respective area. When the spotter rejects a load, they will contact the cashier who will provide to the individual: a list of possible disposal options; and/or the phone number of Metro; where disposal information can be obtained for materials not allowed at the facility.

Control procedures inside the facility are as follows:

1. 1. Material is visually inspected as it is being tipped. The inspection is done by K.B. Recycling spotters or operators. Communication devices are provided to allow contact between the spotter, equipment operator, leadperson or site supervisor, cashier and the office.
2. Spotters, lead persons and the site supervisors are trained to spot suspicious waste, unacceptable waste, and special waste. They are knowledgeable about the identifiable characteristics of these types of wastes and the distinctive markings on containers.
3. Any suspicious waste delivered to the facility will be managed in accordance with all applicable laws and regulations. Suspicious wastes are materials that may be prohibited and the lack of information associated with the waste does not designate it as acceptable.
4. If any inspection or testing performed by K.B. Recycling, or others, reveals that any material which is delivered to the facility is unacceptable waste, K.B. Recycling will contact the hauler to have it removed. If the hauler refuses to remove the material then a qualified firm will be contracted to perform the unacceptable waste cleanup in accordance with applicable law.
5. When it is detected that unacceptable or hazardous waste has been unloaded at the facility, K.B. Recycling will:
 - a. Contain and isolate the K.B. Recycling material.
 - b. If appropriate, notify the company Environmental Compliance Manager who will contact Metro, DEQ or EPA, as appropriate.
 - c. Use good faith efforts to identify the person or persons who delivered the waste. The efforts will use methods that are generally accepted as sufficient to prove responsibility for disposal.
 - d. Preserve and protect the evidence that may assist in proving ownership of, or responsibility for, the unacceptable waste.
 - e. Arrange such cleanup, or require the person(s) who delivered the waste to perform the unacceptable waste cleanup, immediately, in a manner that minimizes contamination of the facility and acceptable waste, minimizes the risk of damage to persons or the environment, and is in accordance with state and federal regulations.
 - f. If the responsible person is unknown or, in K.B. Recycling's judgment, is incapable of complying with the requirements for unacceptable waste cleanup, K.B. Recycling will arrange the unacceptable waste cleanup.
 - g. Fully document all costs for managing suspicious, hazardous and unacceptable wastes.

SECTION IV - EQUIPMENT AND EQUIPMENT MAINTENANCE

A. GENERAL

To a great extent, a well operated materials recovery center depends on a good preventive maintenance program. Except for specific repairs, all maintenance is preventive maintenance. The preventive maintenance program outlined in this section has the following objectives:

1. Ensure maximum safety for all individuals
2. Ensure reliability of operation
3. Minimize or eliminate adverse effects on the surrounding community
4. Protect the Company's investment in the facility
5. Ensure that all supplies, materials and equipment remain available to continue effective facility operation

A complete set of equipment operation, maintenance, and repair instructions are provided in specific equipment manuals. These instructions consist primarily of manuals provided by the manufacturers and describe in detail how a piece of equipment is to be operated, lubricated, and maintained for the best results. In addition, most manuals describe such repair procedures as changing belts, seals, etc. These references must be used, since in many cases warranties will be voided unless manufacturer's procedures are followed.

The equipment operation and maintenance manuals will be updated with maintenance procedures specific to the facility as these are identified through operating experience.

B. MAINTENANCE

B.1 MAINTENANCE RECORDS

Records of service, maintenance, and repair are to be maintained in order to develop historical data (vital for planning purposes) and to provide proper documentation for warranty purposes. The Maintenance Department maintains equipment service, maintenance, and repair records on file.

B.2 EQUIPMENT/GROUNDS MAINTENANCE

Major equipment on the site includes recycling processing sort line, compactor, baler, infeed conveyors, truck scales, rolling stock, environmental controls, and miscellaneous electrical equipment. Inspection and/or maintenance schedules for this equipment and for the-facility bounds are provided in the following subsection. Specific maintenance requirements for equipment are listed in their manual and have been incorporated into the routine equipment inspection program.

All equipment when received from a manufacturer or sales agent is checked for its specifications and operation prior to its use at the facility. No equipment will be used until formally accepted and inspected when received from the manufacturer or sales agent. All equipment will be maintained by K.B. Recycling maintenance personnel with assistance, as required, from off-site contractors.

K.B. Recycling has developed preventive maintenance procedures for the equipment. Daily cleaning of the facility grounds is considered a maintenance function. Additional maintenance schedules will be developed as required.

B.3 MAINTENANCE SCHEDULES

All equipment is inspected daily and is documented on equipment inspection forms. Baler inspection utilizes the manufacturers' Daily Service Record form. The company maintains weekly, monthly, and annual maintenance records. In addition, the company has its drivers complete Daily Vehicle Inspection and Vehicle Condition Reports.

Service and maintenance for all equipment, excluding scales, is recorded on the service record forms. A detail of equipment maintenance, beyond servicing, is recorded on a maintenance work order forms. All equipment maintenance beyond routine servicing requires the Facility Manager's approval.

K.B. Recycling submits oil samples from each equipment oil change to a qualified lab for wear analysis testing. Wear analysis reports are maintained in the equipment files. The following equipment and areas have specific inspections and maintenance items developed for them. Items are recorded on the service record forms, and the maintenance work order forms.

STORM/SEWAGE, ROOF DRAINS, BUILDINGS AND GROUNDS - The storm, sewage and roof drains receive periodic inspections as specified in the K.B. Recycling NPDES permit. Maintenance items are documented on a Purchase Order Requisition form, Appendix 3-J. A copy of storm, sewage, roof drains, buildings and grounds maintenance repair items is kept at K.B Recycling's corporate office.

SCALES - The scales receive an annual inspection by a certified contractor. A certificate of inspection is maintained in the scale house and in the office.

BALER - The baler has specific daily and yearly inspections and servicing patterns. Inspection items are detailed in baler inspection forms. Maintenance items are recorded on baler maintenance forms.

SORT LINE - The sort line has specific daily and weekly inspections and maintenance patterns. Inspection items are detailed in sort line inspection forms. Maintenance items are recorded on the inspection and service order forms.

COMPACTOR - The compactor has daily, weekly, monthly and annual inspections and maintenance patterns. Inspection items are detailed in the detailed daily inspection forms. Maintenance items are detailed on the compactor maintenance forms.

SECTION V - STAFFING: PERSONNEL, DUTIES AND WORK SCHEDULE

This section describes the K.B. Recycling facility's personnel organization structure. Topics include:

1. Work schedules
2. Descriptions of personnel duties
3. Training program
4. Subcontractors

A. GENERAL ORGANIZATION

K.B. Recycling maintains a centralized management and administrative staff to handle the common needs of all of its facilities. In addition, each facility has its own management and technical staff, most of whom are assigned to that facility only.

B. WORK SCHEDULES

Table I shows the K.B. Recycling facility staffing. The facility operates with one primary shift. The day begins at 6:00 a.m. The facility will be opened at 5:30 a.m. by the site supervisor or leadperson. Facility hours and employee shift schedules are subject to change based on customer and production requirements.

Table 1 K.B. Recycling Material Recovery and Processing Facility Staffing

Management Positions	Staff Positions
Facility Manager	Lead person
Site Supervisor	Spotter
Office Admin	Equipment Operator
	Baler Operator
	Sort Line Operator
	Laborers
	Scale House Operator

Note: Positions in BOLD FACE can also be designated as a Facility Manager at any time the regular Facility Manager is not on-site. At those times, the Facility Manager will have overall responsibility for facility operations. A Facility Manager will be on-site during all operating hours.

At all times, the facility is under the direct control of supervisory personnel with full authority to make operating decisions. Maintenance and key operating personnel are on-site as required to accommodate the work needs and are on-call when the facility is closed. Cross training provides for position replacement when individuals are sick or on vacation. At a minimum, staffing is maintained at the facility during primary delivery hours as follows:

1. A Site Supervisor.
2. Equipment Operators, which includes the baler, and sort line operators, in sufficient number to operate equipment at the facility.
3. Spotters in sufficient number to assist in the control of traffic, unloading of material, control of debris, maintenance of the site, recovery of recyclable materials.
4. Scale House Operator sufficient to handle the flow of waste and number of users.
5. Leadpersons and Laborers in sufficient number to process the waste received.
6. Additional personnel as required based on seasonal fluctuations and weekend versus weekday operations.

Workers may be rotated among several positions throughout the work schedule, as directed by the Operations Supervisor.

C. DESCRIPTIONS OF PERSONNEL DUTIES

Descriptions of duties and required qualifications of facility personnel are provided below:

C.1 FACILITY MANAGER

This position is responsible for the coordination and integration of all activity on the site. The Facility Manager's responsibilities include, but are not limited to:

1. Oversee the general operation of the site.
2. Formulate and develop rules, regulations, work methods, and procedures; monitor and review work activities and performance.
3. Coordinate expenditures for day-to-day operations and, if necessary, supervise the preparation of projected facility improvements.
4. Receive and investigate complaints of citizens and recommend remedial action as appropriate.
 5. Lead tours of site for pre-arranged individuals or groups.
 6. Ensure adequate site security.
 7. Maintain health and safety and environmental compliance overall.

C.2 SITE SUPERVISOR

The Site Supervisor is responsible for planning and directing the work of a group of Equipment Operators, spotters and laborers involved in the processing of waste received at the facility. Work involves planning and scheduling employees and equipment in order to ensure full coverage;

developing new and improved methods of handling, recycling, and compacting acceptable wastes, and; providing technical, as well as functional assistance and guidance to subordinates. When the Facility Manager is not on-site, the Site Supervisor also performs the function of Facility Manager with responsibility for the operation of the overall facility.

The Site Supervisor's responsibilities include, but are not limited to:

1. Plan and direct the work activities of a group of subordinates; provide assistance and guidance for difficult or unusual problems; monitor work progress to ensure compliance with operating policies.
2. Develop and implement modifications and revisions in existing operating procedures; initiate improvements in areas of greatest need.
3. Implement and supervise safety policy; ensure that all necessary safety precautions are observed; coordinate safety meetings for employee groups.
4. Provide training of Equipment Operators.

C.3 LEADPERSON

The Leadperson directly supervises Equipment Operators, Spotters, Laborers, Scale House Operators and others as required. The Leadperson is a working position in designated areas responsible for ongoing supervision, and direction of the area's workers. The Leadperson insures safety, quality, and performance standards are being met and provides training as required. The Leadperson may assist the Site Supervisor or Facility Manager in scheduling workers and other tasks that may be delegated. In the absence of both the Facility Manager and the Site Supervisor, a Leadperson may be designated to function as the Site Supervisor.

C.4 SPOTTERS

The Spotter's primary duty is to direct arriving vehicles into appropriate areas for unloading. They ensure the safe and efficient flow of private and commercial vehicles into and out of unloading areas.

Spotters are responsible for visually inspecting waste and recyclables as it is being unloaded in the facility. They look for any suspicious or unacceptable materials, and use good faith efforts to identify the person or persons who delivered the material. They may respond to minor incident containment or cleanups and will call the designated Emergency Coordinator in the event of any major incidents. They will receive initial training in safety and hazardous waste identification and handling procedures.

The Spotter inspects each load of material received to ensure the material quality.

C.5 EQUIPMENT OPERATORS I & II AND SORT LINE OPERATORS

These positions are responsible for the safe and efficient operation of heavy or specialized equipment with complex controls that require considerable manipulative skills. Duties include manual tasks associated with equipment operation assignments. Assignments involve a varying degree of responsibility for the safe operation of the equipment and the safety of others working with the equipment. Training for the equipment is provided to Operators by the appropriate

Supervisor. A list of operators certified to operate equipment is maintained by the Site Supervisor. Equipment Operators, Balers and Sort Line Operators run the front-end loaders, forklifts, skid steer, drop box trucks, the baler, sort line, compactor, wood chipper, yard goat, and other equipment that may be on site.

The responsibilities of the Equipment Operators, Balers, and Sort Line Operators include, but are not limited to:

1. Daily pre- and post- operating inspections on each piece of equipment operated.
2. Operation of equipment in a safe and efficient manner, complying with all company and manufacturers' procedures, exercising appropriate care and judgment.
3. Insure regularly scheduled preventive maintenance of equipment.
4. Perform any other assigned duties designated by the Leadperson or the Site Supervisor.

C.6 LABORER

This position is responsible for the separation and processing of recyclable materials received at the facility. The Laborer will be trained to identify and distinguish between types of materials, including metals and plastics that must be handled separately for effective marketing to recycling markets.

The responsibilities of the Laborer include, but are not limited to:

1. Segregate and remove recyclable materials and reject materials from designated waste loads on the transfer floor or from the various conveyors and picking lines utilized in material processing.
2. Assist the general public in identifying materials and designating the proper bins for disposal.
3. Assist in maintaining adequate storage capacity in bulk receiving areas and in public drop-off bins.
4. Assist in cleaning and maintaining the facility.
5. Provide manual support for the recyclable sorting processes.
6. Insure that the quality of recyclable materials is maintained at a minimum standard, prior to being directed to its designated area.
7. Clean facility and equipment and perform litter patrol functions.
8. Perform other facility functions as directed by supervisors.

C.7 OFFICE ADMINISTRATOR

This position involves varied administrative work, supporting the Facility Manager and Site Supervisor as required. The responsibilities of this position include, but are not limited to:

1. Prepare monthly, quarterly and annual reports as required.
2. Work with Company accounting personnel to prepare on-site records for central processing.
3. Perform reception and telephone operator functions.

4. Perform special studies as directed.
5. Procure necessary supplies and equipment for field and office functions.
6. Coordinate record keeping and data management with scale house personnel.
7. Provide backup to scale operator/cashier functions.
8. Perform other tasks that may be assigned.

C.8 SCALE HOUSE OPERATOR

This position is responsible for the operation of the scale house, the processing of vehicles through the entry scale house area, the charging and collection of material fees and directing customers to appropriate areas of the facility.

The Scale House Operator is required to have knowledge of the computer and records system as well as the ability to identify material types, including recoverable materials. This position will also be the primary point of contact with the general public and will require good public relations skills.

Specific responsibilities of the Scale House Operator include, but are not limited to:

1. Opening and closing the material receiving/records system on a daily basis.
2. Operating the scale and managing the flow of receipts and records required between the facility and the waste hauling trucks.
3. Receiving the general public as they enter the facility and making judgments as required about incoming material to determine fees.
4. Managing cash transactions; maintaining proper records and receipts to ensure that cash received is fully accounted for.

C.9 FACILITY MAINTENCE PERSONNEL

This position has the lead responsibility for all maintenance of the K.B. Recycling site.

Specific responsibilities include, but are not limited to:

1. Develop, implement and track a preventive maintenance program for all facility equipment and structures.
2. Acquire and maintain appropriate tooling and repair equipment to adequately service the facility and its equipment.
3. Diagnose and recommend needed repair of facility and equipment as required.
4. Review routine preventive maintenance on all equipment.
5. Schedule and implement facility maintenance.

D. OPERATIONS TRAINING PROGRAM

All personnel are required to participate in an on-going training program with an emphasis on safety and loss prevention, employee morale, productivity and customer satisfaction. All personnel are given an orientation program upon hiring after which they then participate in the on-going training programs for all personnel.

This program is designed to educate employees about the overall functioning of the facility, their particular responsibilities, hazards associated with facility operation functions, and methods to minimize such hazards. This program also educates employees about the existence and location of safety equipment, personal protective gear, emergency directories, and the response procedures to follow in the event of an emergency.

As required, selected employees will receive specialized training, off-site, directly related to their individual work responsibilities and hazardous materials.

E. SUBCONTRACTORS

The following subcontractors are involved in the listed activities:

1. Household Hazardous Waste -Disposal & Transportation
Safety Kleen
16540 S.E. 130th Avenue
Clackamas. OR 97015
(503) 655-3068
2. Spill Response Contractor-Hazardous Materials Spills
Safety Kleen
16540 SE 130th Avenue
Clackamas, OR 97015
(503) 655-3068
3. Spill Response Contractor-Oil Spills
Clean Harbors, Inc.
14434 SE Industrial Way
Clackamas, OR 97015
(503) 785-0404
4. Pest Control Contractor
Paramount Pest Control, Inc.
PO Box 13386
Portland, OR 97213
(503) 288-7375
5. Noise Consultant
Daly, Standlee & Associates
11855 SW Ridgecrest Drive #201
Beaverton, OR 970705
(503) 646-4420

6. Used Oil Contractor

Thermo Fluids, Inc.
12533 SE Carpenter Dr.
Clackamas, OR 97015
(503) 788-4612

SECTION VI - GENERAL CONTINGENCY PLAN

A. INTRODUCTION

This section provides information on procedures to be followed in the event of certain unusual occurrences. Because the facility is a vital link in the operation schedule of contract haulers bringing materials to the facility, facility functions must continue as normal as possible under these circumstances.

B. BAD WEATHER

In the Portland area, potential types of bad weather that could affect operations include:

1. "Black ice" or freezing rain
2. Excessive rain or snow
3. Excessive wind

These conditions could cause some or all material deliveries to stop, and could also prevent the transfer of waste from the facility. The number of staff available could also be limited because of travel conditions. The Facility Manager or his/her designate would assess the situation, and staff assignments would be adjusted accordingly. It is likely that material volumes would increase in the period following such weather. Special arrangements, including extended working hours, may be necessary in such cases.

C. EQUIPMENT FAILURE

The compactor, baler and conveyor units are the only pieces of equipment that if broken or unusable, for any reason, might potentially interrupt the flow of material. However, if such an event were to occur for an extended period, material deliveries could be rerouted to an alternate facility. Materials already received could be loaded into open top trailer/trucks and shipped to directly to the disposal facility.

All other equipment is mobile equipment and can be easily and quickly replaced with other equipment on-site or from other KB facilities.

D. SITE ACCESS BLOCKAGE

If arterial access to the facility is denied because of an emergency, K.B. Recycling will consult with Metro and/or Clackamas County regarding an alternative transportation plan. If the blockage appears to be lengthy, haulers may be diverted to an alternate facility. Material at the facility may be held in containers, trailers or on the floor of the facility until conditions allow shipment.

E. CLOSURE PROTOCOLS

This section of the Operating Plan addresses the protocols for closure and restoration of the site in the event of a cessation of operations as provided in Metro Code Section 5.01.060 (c) (3). The closure protocols in this Plan establish procedures for the following circumstances:

A.1 SHORT TERM CLOSURE

In the event of a short term closure where the duration of the closure is more than seven (7) consecutive days but less than thirty (30) consecutive days.

From time to time, the facility may be shut down for routine maintenance, equipment upgrades, and other planned plant turnaround activities. For planned short term shutdowns, all regulators, customers, employees, and interested parties will be notified at least thirty (30) days in advance of the pending planned short term shut down date. In addition to identifying the date of the planned shutdown, all notified parties will be noticed of the planned restart date of the facility.

In the event of an unplanned or emergency shutdown or closure of the facility, management will notify regulators of the event and the circumstance that caused the event within two (2) business day of the occurrence of the event. Customers, employees, and related stakeholders will be kept apprised of the circumstances of the unplanned shutdown, and the plan for getting the facility back up and running.

A.2 LONG TERM CLOSURE

In the event of a long term closure where the duration of the closure is thirty (30) consecutive days or more in length.

The long term closure protocol for the K.B. Recycling facility will consists of three procedural steps. The first consists of formal notification to regulators, customers, employees, and other stakeholders of the intent to close the facility. At least thirty (30) days prior to any intention to close the facility, management will contact affected parties, and advise them in writing of the pending intention of closure. The principal contacts list is as follows:

State and local governments:

- Oregon DEQ – Solid Waste Division (DEQ solid waste permit no. 480)
- Oregon DEQ – Water Quality Division (industrial stormwater 1200-Z permit)
- Metro – Solid Waste Compliance and Cleanup Division (License no. L-007-12)
- Clackamas County – Department of Transportation and Development (Conditional Use Permit no. Z0174-96-C)
- Clackamas County – Water Environment Services
- Clackamas County – Garbage and Recycling

Customers, employees, and other stakeholders:

- Customers – all active customers at the time of closure plus inactive customers dating back one (1) year from the proposed date of closure
- Employees – all full and part time employees at the time of notice to close
- Stakeholders – as identified at the time of notice to close

The second step in the long term closure process will be to remove and safely dispose/sell materials that are in inventory at the time of closure. The principal function of the K.B. facility is to receive, process and/or separate recyclable materials and then transport them to other destinations for additional processing and/or disposal. The facility only receives loads with a high percentage of recyclable materials, source separated materials, and mixed waste. The disposition plan for materials on-site at the time of closure is as follows:

- Mixed dry waste on the tipping floor at the time of closure will be loaded into 20 yard drop boxes and transported to a Metro designated facility for transfer and disposal. The maximum anticipated amount of unprocessed mixed dry waste on the floor is one hundred (100) cubic yards. An example of such a facility would be the Metro South transfer station in Oregon City.
- In the event any hazardous waste is discovered and the generator or hauler cannot be identified, the material will be removed from the facility by a licensed contractor and shipped directly to an authorized storage or disposal site. If the generator is identified, he or she will have the option of removing the material. If he or she does not choose to, or cannot remove the waste, K.B. Recycling shall contract such removal at the expense of the generator and/or hauler.
- Principal Recyclables - Glass, plastic, newspaper, mixed paper, high grade paper, corrugated cardboard, wood, drywall, and non-ferrous metals in inventory at the time of closure will be prepared for transport and shipped off site to customers. Transport of these materials can be facilitated by K.B. Recycling trucks, customers' rolling stock, or common carrier.

The final step in the long term closure process will be to secure the facility. Since the land and buildings are owned by the Applicant (i.e., the Kahut family), it is anticipated that the assets will be retained by the family. The entire perimeter of the property is fenced with a locking gate at the entry point on SE Clackamas Road. Also, the site is fully developed, and paved. In terms of future land uses for the site, Subsection 602.05B11 of the Clackamas County Zoning and Development Ordinance (ZDO) permits consideration of recycling centers and transfer stations subject to the Clackamas County Comprehensive Plan Section 819 as a Conditional Use. The subject facility is operating under a valid Clackamas County Conditional Use Permit (Z0174-96-C). This means once the current facility is closed, the conforming conditional use of the facility could again be a recycling facility or transfer station. No material restoration to a pre-existing condition will be required.

SECTION VII - CONTINGENCY PLAN A. PURPOSE AND SCOPE

The purpose and scope of this Contingency plan is to provide guidance to insure personnel safety and to minimize hazards to human health and the environment. This plan is intended to meet applicable state and federal requirements.

A. CRITICAL PERSONNEL CONTACTS

A.3 FACILITY INFORMATION

Name of Facility:K.B. Recycling, Inc.
 Type of Facility: Commercial Solid Waste
 Location & Mailing Address9602 SE Clackamas Road
 Clackamas, OR 97015
 Name of contact person:Andy Kahut
 Phone number:(503) 659-7004
 Fax number(503) 659-2107
 E-mail address: akahut@kahutwasteservices.com
 Name and address of company owner or parent company:Kahut Investment Holdings, LLC
 PO BOX 550
Canby, OR 97013
 Phone number:(503) 266-7903
 Fax number:(503) 263-6477 E-mail address
 E-mail address fred@kahutwasteservices.com

A.4 APPLICABLE APPENDICES

A. Statement of Authorization for K.B. Recycling Emergency Coordinators and Alternates

Name	Title	Address & Phone No.
Kahut Investment Holdings, LLC	Owner	P.O. 550, Canby, OR 97013 (503) 266-3900
Andy Kahut	General Manager	P.O. 550, Canby, OR 97013 (503) 266-3900
Ray Kahut	Plant Manager	P.O. 550, Canby, OR 97013 (503) 266-3900

A.5 Emergency Call list

<u>Emergency type</u>	<u>Service provider</u>	<u>Phone Number</u>
Injury	Willamette Falls Hospital	(503) 657-6702
Fire	CCFD #1	911
Public & Life Safety	CCFD #1	911
Clean-up	Clean Harbors, Inc.	503-785-0404
Spill Reporting	Oregon Emergency Response System	800-452-0311

B. PREPAREDNESS AND PREVENTION

B.1 DESIGN AND OPERATION

The K.B. Recycling facility has been designed and constructed in a manner that minimizes the potential for environmental exposures, fires, and explosions. Its features include paved material handling areas and appropriate containers for material staging. The facility is inspected regularly and cleaned daily.

Operational procedures, plans, and equipment that further reduce potential environmental exposures include the personnel training program, inspections, reporting procedures, and this Contingency Plan.

B.2 EMERGENCY COORDINATOR AND RESPONSE TEAM

The Environmental, Safety & Health (ES&H) Manager is responsible for handling situations at the facility that require implementation of the contingency plan. The ES&H Manager will assume responsibility for all emergencies and response measures relating to hazardous waste and will report to management regarding spills and emergencies. The ES&H Manager will form an Emergency Response Team. K.B. Recycling will maintain a Statement of Authorization for each member of the Emergency Response Team.

The ES&H Manager alternates are familiar with all aspects of the contingency plan, and they retain copies of it in their offices. Additional copies are maintained at the facility for inspection. Either the primary or the alternate ES&H Manager is at the facility at all times or can reach the facility quickly. Members of the facility's emergency response team may also be needed to assist the ES&H Manager in the event of an incident. Their specific duties are described in the operations personnel training plan maintained by the facility (Section V). The ES&H Manager has the authority to commit whatever K.B. Recycling resources are needed to carry out the contingency plan.

General Procedure for Emergencies

In the event of an imminent or actual emergency situation, the following steps will be taken:

1. Contact the ES&H Manager or alternate.
2. The ES&H Manager/Alternate Emergency Coordinator will activate internal facility alarms or communication systems to notify all facility personnel.
3. If there has been a release of hazardous materials, the ES&H Manager/Alternate Emergency Coordinator will identify and determine the extent of the release.
4. If the ES&H Manager/Alternate Emergency Coordinator determines that there has been a release which could threaten human health or plant & equipment, he will notify the appropriate local agencies (police, fire, and/or hospital)
5. The release will be controlled and contained as described below in "Specific Instructions for Chemical Spills".
6. The ES&H Manager/Alternate Emergency Coordinator will insure that fires, explosions and releases do not occur, recur, or spread.

7. The released material will be properly treated and cleaned up as described below in "Specific Instructions for Chemical Spills".
8. If evacuation of the facility is necessary, steps will be carried out.
9. The ES&H Manager/Alternate Emergency Coordinator will insure that no waste that may be compatible with the released materials is treated, stored, or disposed of until clean-up procedures are completed.
10. After the emergency, the ES&H Manager/Alternate Emergency Coordinator will insure that all emergency equipment is cleaned, and fit for use before operations are resumed.

B.3 ARRANGEMENTS WITH LOCAL RESPONDERS

In an emergency to which plant personnel cannot adequately respond, the services of the designated spill response contractor, local fire department, police, or hospital may be required. Coordination arrangements have been made with the agencies and organizations included in the information listed above.

B.4 PERSONNEL TRAINING

The ES&H Manager and alternates, as well as members of the emergency response team, complete a program of classroom instruction and/or on-the-job training that includes implementing the contingency plan. Other key employees who work with suspicious or hazardous materials also receive training, at least annually.

The personnel training program includes the following:

1. Orientation for new employees on the facility's safety program and contingency plans, as well as basic personal safety instruction.
2. Regularly scheduled safety meetings.
3. First aid instruction for selected staff members.
4. Specific instruction for all personnel regarding the hazards associated with chemicals used at the facility and the location of information concerning each (in compliance with federal hazard communication standards).
5. Fire prevention and firefighting instruction.
6. Instruction for all personnel on how to detect suspicious and hazardous materials before and after it is unloaded and how to identify the person(s) who disposed of the materials.
7. Instruction concerning detailed procedures to effectively respond to emergency situations and implement the contingency plan.
8. Routine inspection and testing program for all safety- and emergency- related equipment and protective devices (the results of which will be discussed at the safety meetings). This is part of the facility maintenance procedures (see Section IV).
9. Thorough investigation of all accidents to ascertain their cause and to devise methods to prevent them from recurring.
10. Issuance of an employee safety manual to each department for use in training sessions and for

personal reference.

11. Posting of safety bulletins or posters concerning accidents, hazards, or hazardous conditions occurring elsewhere in the industry.
12. Routine walk-through inspections conducted by Company personnel through all areas of the facility, seeking out potential or current safety hazards, including permanent equipment and building features.
13. Maintenance of a training log indicating date of training and employee's name.
14. Observation of all applicable Occupational Safety and Health Administration (OSHA) standards.

Annual training review for all employees. Training review includes discussion of pertinent hazards at each department.

B.5 SECURITY

The facility has established security measures to prevent entry of unauthorized persons. Access to the site is controlled by perimeter fencing and gates across the entrances. The front gate is kept closed when the facility is not receiving waste. The rear gate is kept locked at all times, except for emergencies. Supervisors, maintenance personnel and lead persons have keys to open all facility gates. K.B. Recycling also utilizes a company to maintain security during off-hours.

C. EMERGENCY EQUIPMENT

C.1 EXTERNAL COMMUNICATION SYSTEM

In a major emergency, any situation that endangers life and/or property, or is a threat to adjoining properties, the Site Manager will call, or designate someone to call, the proper authorities and corporate management. All telephones at the facility have the capability of off-site calling.

C.2 ALARM SYSTEMS AND INTERNAL COMMUNICATIONS

K.B. Recycling has developed a communication and alarm system capable of initiating the emergency response procedures and of enabling rapid evacuation of affected areas. The internal communication and alarm system consist of:

1. Telephones
2. Two-way radios
3. Gas detection system using lights and sirens

Two-way radios are carried by most K.B. Recycling operations staff. Scale house and the K.B. Recycling receptionist are also in radio contact with facility floor personnel.

C.3 FIRE CONTROL EQUIPMENT

The building has a complete sprinkler system, which is automatically activated by heat sensors. The fire control equipment at the facility includes sprinkler system, portable fire extinguishers, fire hydrants and fire hoses. The locations of the fire hoses and the fire extinguishers are shown in Figure 1. There are two hydrants, one is located at the northwest end of the building and the second is at the southeast end of the property. Portable fire extinguishers are used to control small fires, and all employees are trained in their proper use. Fires are classified in three categories and each type of fire can be controlled by certain types of extinguishers as shown in Table 2. All of the facility's fire extinguishers are rated to handle A, B, and C classes of fire extinguishers.

Table 2 Fire Extinguisher Use

Class of Fire	Type of Fire	Extinguisher
A	Combustible fire	Use water, ABC, Halon, or
B	Flammable liquids	Use ABC, BC, Halon, or Purple K
C	Electrical fire	Use ABC, BC

D. SPILL AND EMERGENCY RESPONSE PROCEDURES

Whenever there is an actual or imminent emergency, the procedures listed in this section shall be implemented.

D.1 SPILL RESPONSE EQUIPMENT

Absorbent material is kept at various locations in the facility, in large plastic cans, so that personnel can respond to hazardous material and petroleum releases, until appropriate cleanup measures are implemented.

D.2 DESCRIPTION OF WASTES PRESENT

The facility receives solid wastes from commercial, industrial and source separated recyclable material sources. Materials that fit the definition of hazardous wastes under 40 CFR 261 may be unintentionally included along with other, non-hazardous wastes. Discovery of suspicious or hazardous wastes from these sources is the primary focus of this contingency plan.

K.B. Recycling also stores certain materials, designated by DOT or OSHA as hazardous, for use in maintenance activities. Hazardous materials stored and used on-site are accompanied by Material Safety Data Sheets (MSDS). MSDS are available in the break room for review by personnel. Employees have been informed of the contents and location of the MSDS as part of their training.

D.3 DEFINITION OF MINOR AND MAJOR EMERGENCIES

The appropriate response action for any given spill or emergency depends on the material released, the amount of material, and where the release occurs. The following is the general definition of a minor emergency and the general definition of a major emergency.

Minor Emergency Definition:

1. Any situation that could possibly endanger personnel or damage property in a given process or area but that can be controlled with available facility portable emergency equipment and/or facilities and staff.
2. Adjacent areas and neighboring properties are not endangered, full mobilization of the facility is not required, although outside help may be called in as backup.
3. Any situation where the specific hazards of the spilled or released waste are compatible with other nearby materials and/or do not constitute a potential threat to human health or the environment.

Major Emergency Definition:

1. Any situation that could endanger personnel and/or property that is also a threat to neighboring areas or the community surrounding the facility.
2. Outside help must be secured and the facility mobilized to control the emergency.
3. Any situation where the specific hazards of the spilled or released waste are deemed to be incompatible with nearby materials and/or constitute a potential threat to human health or the environment.

D.4 D.4 PLAN IMPLEMENTATION

The activities involved in implementing the contingency plan and the sequence in which they are implemented are listed and then described below. The Site Manager is responsible for implementing the following activities:

1. Briefly assess the situation to determine whether a total or partial facility evacuation is necessary (i.e. decide whether circumstances constitute a minor or major emergency).
2. Assess potential hazards to human health or the environment presented by the release.

3. Assess the source, extent and nature of the material involved in the release.
4. Activate alarm, if necessary.
5. Initiate partial or total facility evacuation, if necessary.
6. Isolate the spill with absorbent material, if necessary.
7. If a major emergency has occurred, including a reportable spill, telephone OERS and the spill response contractor. If a minor emergency has occurred and outside help is needed, telephone spill response contractor.
8. Implement notification procedures (Corporate Management and/or Metro, DEQ, or EPA). The spill response contractor will implement control and cleanup procedures as required.

A detailed spill response, and asbestos identification plan is explained in addendum F.

D.5 EVACUATION PLAN

In case of fire, explosion or other emergency requiring evacuation of the entire facility, supervisors and operators will be notified by two-way radio to activate the evacuation plan.

Upon receiving notification, employees of the affected area are instructed to take all precautions for their own safety and to do as the Site Manager directs. Any individual who enters the affected area must be properly equipped and follow company procedures regarding personnel safety during emergencies.

Employees will evacuate the facility via the nearest accessible exit. The evacuation route each employee takes to the facility gates will depend on where the person is located at the time of the emergency. All personnel will gather at the front gate for a head count.

The Site Manager is responsible for determining that all facility employees and visitors have been evacuated. This will be accomplished for workers by taking a head count. All visitors are under escort at all times and are to be evacuated by facility employees. Spotters will be responsible for getting both public and private haulers out of the building. Evacuation drills will be conducted periodically to ensure smooth operation of the plan. If evacuation is necessary, the Site Manager will notify the Corporate office, which will then notify Metro.

Note: All non-employees will be escorted to the front gate and will not re-enter the facility until the Site Manager authorizes re-entry.

D.6 D.6 INITIAL ASSESSMENT AND EVALUATION

The first response procedure is to assess and evaluate the release. The Site Manager will visually assess the emergency situation and contact available witnesses to the release to determine whether facility evacuation is necessary. If the Site Manager determines that the situation endangers (or is likely to endanger) the safety of facility personnel, the Site Manager will begin an evacuation of the area immediately affected by the release, or an evacuation of the entire facility. This decision will be made based on the initial assessment of the extent of the danger presented by the emergency. During those times when the primary Site Manager is not at the facility, the operations supervisor will immediately contact the primary Site Manager, describe the emergency, and follow the Site Manager's oral orders until he or she arrives at the facility or until the primary Site Manager

can delegate authority to an alternate.

D.7 IDENTIFICATION OF MATERIALS

The Site Manager will assess the source, extent, and nature of the materials involved in the release. This information is intended only to assist the spill response contractor in characterizing the nature of the release. The Site Manager will accomplish this by visually inspecting the situation and by talking with any witnesses to the release.

If there are no eyewitnesses to the incident, the Site Manager will use the following information to identify the hazardous materials:

1. **Type of Waste:** The spotter who directs unloading of waste has a good knowledge of typical load contents or who delivered the material. The spotter may also have information about the contents of the waste load.
2. **Location of the Incident:** The location of the incident will give an indication of the waste that might have been released.
3. **Container Involved:** The number and type of containers involved in a spill will provide an indication of the amount of waste that has been released.
4. **Container Labels:** All hazardous materials packaging should be labeled. The label will help identify the type of waste in the event of a release. Deposited wastes will be examined for containers showing evidence of leakage. If the generator is known, have a MSDS faxed to the facility, the MSDS may identify the type of waste.
5. **Other Information:** Visual observations of the labels and existing chemical analyses of wastes will be used to determine potential identity and risks of the release. If the identity of the material released cannot be accessed through these means, the Site Manager will consult the spill response contractor.
6. **Initial Response Sampling and Analysis:** All response sampling and analysis will be conducted by the spill response contractor. He or she will perform any further activity necessary to stabilize cleanup and decontaminate the area.

D.8 ASSESSMENT AND OFF-SITE NOTIFICATION

After tentatively identifying the material that has been released, the Site Manager will assess possible hazards to human health or the environment that may result. Appendix 4-C is a Field Assessment Checklist to assist in the evaluation and record keeping of the incident. This will be done by reviewing MSD sheets for materials potentially encountered at the facility and evaluating the available information about the materials involved and the quantity and location of the release.

If the Site Manager determines that the facility has had a release, fire, or explosion that could threaten human health or the environment and cannot be controlled with available facility response equipment, or that requires evacuation of the immediate facility vicinity, the Site Manager or the alternate present at the site, will immediately initiate the following notification procedures:

1. Contact plant and corporate personnel as needed from the Emergency Phone Number List shown in Appendix 4-8.
2. Contact the external authorities shown in Appendix 4-8 at the direction of the Environmental

Compliance Manager or Operations/Safety Manager.

3. Provide the following information to authorities, if available.

- Name and telephone number of caller and name and address of facility
- Time and type of incident
- Name and estimated quantity of materials involved and extent of injuries
- Possible hazards to human health or the environment outside the facility
- Steps taken to contain or clean up hazardous material.
- Agencies that have been notified

Releases of more than a specified amount of hazardous substances listed in 40 CFR 302.4 (referred to as a Reportable Quantity) must be reported to the National Response Center. This applies to releases of substance beyond secondary containment provisions at the facility where the substance enters soil, surface water, or air. Any spill meeting the Reportable Quantity Requirements of OAR 340-142-0050 are to be reported immediately to the Oregon Emergency Management Division's Oregon Emergency Response System (OERS) by calling 1-800-452-0311.

D.9 CONTROL PROCEDURES

Once the materials involved in a release have been tentatively identified, control procedures described below will be implemented and the appropriate agencies will be notified. The control procedures involve physically controlling the spread of a spill or release and cleaning up the spill or release residue.

The control procedures implemented will depend on the type of release (such as spill of solids, liquid or gas) and the magnitude of the problem presented by the release (minor or major emergency). Table 5 lists the general control procedures that may be implemented in a minor emergency. These procedures will not require implementation of the contingency plan.

Table 5 Minor Emergency Procedures (Contingency Plan Not Activated)

1. Maximize the safety of all employees and visitors in the area. Prevent inadvertent access into the release area by using traffic control devices or by staffing the location with an employee.
2. Implement partial facility evacuation, if necessary.
3. Call spill response contractor to perform assessment and cleanup.
4. Clean up spills in accordance with accepted procedures. This is the responsibility of the spill response contractor.
5. Notify corporate management and the agencies as in D.8, as appropriate.
6. Transport containers to appropriate disposal area or remove from site as appropriate. If the release is considered a major emergency, the Site Manager is contacted. The Site Manager will

Table 6 below lists the control procedures that may be implemented in the event of a major emergency. The contingency plan will be implemented in the event of a major emergency. Major emergency steps listed below may occur concurrently to each other.

Table 6 Major Emergency Procedures (Contingency Plan Activated)

1. Maximize safety of all employees and visitors to the area. Prevent inadvertent access into the release area by using traffic control devices or by staffing the location with an employee.
2. Implement partial or full facility evacuation, if necessary.
3. Call spill response contractor to perform assessment and cleanup.
4. Stop container leak at source, if possible. (This should only be attempted with proper PPE and adequate equipment for the spilled material).
5. Contain spilled material. Use absorbent material to contain spilled liquids if there is a risk that the liquid will spread.
6. Notify corporate management and the agencies in D.8, as appropriate.
7. Clean up spill in accordance with accepted procedures. This is the responsibility of the spill response contractor.

D.10 LEAKAGE AND SPILLS OF HAZARDOUS OR SUSPICIOUS WASTES

Contingency plans have been developed to respond to releases from leaking containers of hazardous or suspicious wastes. In the event of a spill or leak of suspicious waste from a container, a K.B. Recycling responder will assess the situation and, if appropriate, isolate the material and contain the area. The remaining liquid will be transferred to an approved drum and any spilled liquid will be absorbed with an absorbent. The spill response contractor will perform this work.

K.B. Recycling will use good faith efforts to identify persons who dump identified hazardous wastes. The "Spotters" working on the tipping floor will be trained to identify suspicious wastes through knowledge of distinctive markings on containers. Methods and documentation used will be sufficient to prove who is responsible for disposing of these wastes. The cleanup and documentation will be performed in a manner that minimizes contamination of the facility and of acceptable waste, minimizes risk of damage to persons or the environment, and is in accordance with state and federal regulations.

In the event of a minor or major emergency, DEQ and/or Metro will be notified by K.B. Recycling as soon as practicable, but within twenty-four (24) hours.

D.11 DECONTAMINATION ACTIVITIES FOLLOWING CONTROL OF INCIDENT

Following control and initial cleanup of the release, the spill response contractor will initiate post-emergency cleanup and decontamination activities, if necessary. Depending on the magnitude of the incident (e.g. extent of damage, contamination, or release) and the type of waste involved, cleanup activities may vary widely. The spill response contractor will make a case-by-case determination of activities in consultation with the site manager. In general this determination will be based on the following methodology:

1. Initial sampling and analysis. Following initial stabilization of the emergency situation (e.g. temporary berming), the spill response contractor will determine whether sufficient information is available to determine an appropriate method of cleanup and subsequent decontamination. If insufficient information is available, the spill response contractor will sample and analyze spill residues to generate sufficient information to make this determination.

Before sampling, the spill response contractor will consult with corporate management and guidance documents, if needed, to determine the appropriate sampling (including personnel protective equipment, sampling methods, and sample containers) and analysis protocols.

2. Initial decontamination. Following assessment of the chemical nature of the residues, the spill response contractor will determine appropriate decontamination methods, including the types of cleaning solutions and equipment required, methods of cleaning, and residue collection and management.
3. Follow-up sampling and analysis. Before completing the cleanup and decontamination activities, the spill response contractor may conduct additional sampling and analysis to determine the effectiveness of the cleanup operation. Procedures will be similar to those previously noted. If analysis shows that further cleanup is needed, these activities will also be conducted.
4. Final decontamination activities. Following determination by the spill response contractor that

decontamination and cleanup are complete, the spill response contractor will instruct cleanup personnel to decontaminate reusable or salvageable response equipment. Contaminated items not suitable for reuse (e.g., disposal clothing) will be discarded along with the spill residue, or in separate containers, as appropriate.

D.12 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

During an emergency, the Site Manager or his/her designate, will undertake reasonable measures necessary to minimize the potential for a secondary fire, explosion or release. The following procedures will be carried out:

1. Access to the affected area will be controlled to reduce the possibility of spilled material spreading to other areas.
2. Containers, valves, pipes, and transfer vehicles in the affected area will be inspected for other potential for releases. Valves will be closed to reduce the potential for additional releases.
3. The affected area will be inspected to determine whether gas or heat buildup is occurring and whether this could lead to a fire or explosion. If so, fuel valves will be closed and electrical power which does not hamper firefighting equipment will be shut off.
4. Waste materials will be isolated to reduce the possibility for contact with any potentially incompatible materials.

If there is a risk of fire, any containers of ignitable materials that may be stored nearby will be removed from the area or have water sprayed on them.

D.13 STORAGE AND DISPOSAL OF RELEASED MATERIAL

Wastes that are involved in an unplanned release will be cleaned up as described earlier in D.11. Following control of the release, drums containing spill residue, contaminated soils, absorbent, contaminated clothing, and decontamination equipment and residues will be labeled and removed to an appropriate storage/disposal facility by a licensed contractor.

By using test data and referring to chemical compatibility information, the spill response contractor will determine the appropriate method and location for storage.

D.14 INCOMPATIBLE WASTES

Incompatible wastes (hazardous materials, liquids, etc.) will be removed from the waste stream, segregated into appropriate categories, and staged for pickup and disposal by the spill response contractor or the generator.

D.15 POST -EMERGENCY EQUIPMENT MAINTENANCE

The Site Manager is responsible for overseeing the post emergency equipment inspection. The specific details of the inspection plan depend on the type and extent of the emergency. Following is a list of typical inspection procedures:

1. Replace fire extinguisher(s) used during the emergency.

2. Visually inspect and roll up fire hose(s).
3. Check stock items in first aid kits and replenish as needed.
4. Conduct general housekeeping inspection of production areas affected by the emergency, including but not limited to electrical and hydraulic systems, ventilation equipment and mobile equipment.

Management will assess each post-emergency situation and develop an appropriate inspection schedule to implement corrective actions.

D.16 AMENDMENTS TO THE PLAN

The Contingency Plan will be reviewed annually and revised as necessary. The plan will be revised if:

1. Applicable regulations change or the facility permit is revised.
2. The facility changes in design, construction, operation, or maintenance; if other circumstances develop that substantially increase or decrease the potential for releases of hazardous waste or hazardous waste constituents; or if changes occur in the response necessary in any emergency.
3. The list of Emergency coordinators change.
4. The Emergency Phone Numbers List changes.
5. The list of emergency equipment changes substantially.

SECTION VIII - REPORTING PROCEDURES AND COORDINATION

A. GENERAL

The K.B. Recycling facility uses a reporting system that allows both internal functioning and a flow of required information to Corporate Headquarters, DEQ and Metro. The reporting system has been designed to integrate smoothly with the daily work routines of staff members with reporting functions. This section contains a description of the facility reporting and information system.

With the exception of required reporting and operational data, all personnel and operational files are kept by the personnel department at the Corporate Office.

B. REPORTS/RECORDS

A monthly facility report is generated which summarizes all daily and weekly tonnage, maintenance, safety and health, and operational data for each month.

B.1 PERSONNEL RECORDS

Complete detailed personnel records are maintained at the Corporate Office.

B.2 TRAINING RECORDS

Employee training records are kept in the K.B. Recycling office and are stored in individual employee files. As an employee receives work related training, documentation of the training is placed in his/her file. Training records are archived at the Corporate office when an employee leaves K.B. Recycling employment. Training records are retained, at a minimum, for as long as specified by the individual training requirements.

B.3 WASTE DISPOSAL RECORDS/REPORTS

Tonnage of material received at the facility is recorded automatically by a computerized system installed in the scale house. The readout from the scale is automatically recorded and stored by computer. Tonnage and yardage records are summarized daily and entered into files which are stored on diskettes kept in the administrative building office.

Monthly waste reporting is compiled by the Corporate accounting group. K.B. Recycling personnel assist Corporate accounting personnel, if necessary, in report completion. Monthly tonnage reports are submitted to Metro and/or DEQ by Corporate Accounting.

B.4 EQUIPMENT/MAINTENANCE REPORTS

Operator reports are reviewed by the maintenance department on a daily basis. Repair logs are periodically reviewed by both maintenance and management to be sure schedules are in order and maintenance items are not above normal. Mileage and/or hours of operation for each piece of mobile equipment used at the facility are recorded then compiled in a monthly report. These reports are used to review equipment needs, identify under-used equipment and develop equipment

replacement and maintenance schedules. The equipment mileage and hours records and equipment lists are kept in the Corporate Office.

A comprehensive list of equipment owned or leased by K.B. Recycling, Inc. is kept at the facility. This list includes a description, the license number, and the serial number of each piece of equipment in use. The list is updated as new equipment is acquired and old equipment is removed from operation.

Maintenance records are maintained by maintenance personnel under the direction of the Facility Manager. For more detail on equipment and maintenance reports see Section IV, of this manual.

B.5 PERSONAL INJURY ACCIDENTS

In the event of a personal injury accident, the Operations Supervisor or other senior individual assumes immediate responsibility at the scene. He/she seeks assistance from other employees, designates someone to make necessary calls and administers first aid. The victim should not be moved if there is a possibility of broken bones or severe injury.

Accident response and reporting procedures are outlined in Section IX, of this manual, and in the K.B. Recycling Health and Safety Manual.

B.6 MONITORING AND REPORTING REQUIREMENTS

K.B. Recycling is required to submit monitoring reports to Oregon DEQ and other State agencies on a scheduled basis. K.B. Recycling's annual NPDES report is compiled by the Facility Manager and submitted to DEQ. Annual recycling and monthly volume reports are compiled by Corporate Accounting and submitted to Metro and/or the DEQ as scheduled. The State of Oregon Fire Marshal report is completed and submitted annually to the State Fire Marshal, by Management.

SECTION IX - SAFETY PLAN

It is K.B. Recycling's policy to provide a safe work place for all employees. The solid waste industry need not be any more dangerous than any other industry consisting of manual labor jobs. Avoiding accidents requires a thorough knowledge of safe procedures and the observation of these safety procedures through good common sense. It is everyone's responsibility to know these procedures and to follow them. Starting the first day on the job, new employees must learn the safety procedures immediately and thoroughly. Violations of safety rules and regulations will not be tolerated, and failure to comply with these rules will result in disciplinary actions. It is the supervisor's responsibility to see that all employees are properly trained in the use of safety procedures. When supervisors enforce the safety rules and the employees follow them, on-the-job injuries will be kept to a minimum.

A. SAFETY PROGRAM

The K.B. Recycling safety program includes:

1. Risk management/loss control
2. Claims reporting
3. Physician/clinic procedures
4. Hazard communication-right to know

In addition, K.B. Recycling maintains OSHA record keeping requirements for documentation and reporting. These program elements provide a safe work place, and remain in compliance with regulatory health and safety requirements.

B. GENERAL PRECAUTIONS AND PROCEDURES

All employees must wear work clothing that offers protection from possible injuries and lost-time accidents: full-length trousers; coveralls (clothing must not be frayed or torn); and high top, steel toed work boots with nonskid soles. Gloves, safety glasses, hearing protection, safety vests (spotters only), dust masks, and hard hats will be provided by K.B. Recycling. Dust masks that cover the nose and mouth are to be worn in areas where dust has been shown to be a problem. Hearing protection is required in designated areas, and eye protection is required at all times in the main receiving and recycling building. Scale house attendants and office employees are exempt from this requirement except when entering the processing areas. The above items are supplied by K.B. Recycling and are mandatory wearing apparel. If an employee wears prescription eyeglasses, they must be of the safety-lens type.

Employees must know the locations of fire extinguishers and other types of firefighting equipment.

Employees must know proper procedures to be used in the event of oil, gas, or chemical spills; these procedures are addressed in Section VII.

Employees must be aware of the various hazardous materials designations and symbols that are used on containers for use or transportation. Employees must be familiar with procedures to follow if they should come into contact (either physically or visually) with these types of chemicals -

whom to contact, and what precautions to take until a supervisor or a person of authority arrives. The employee who makes the discovery is in charge until he or she is relieved by a supervisor, Corporate Operations, the spill response contractor, police, fire department, or a responsible regulatory agent.

Three rules should be applied when evaluating possible emergency response actions:

1. Do not do anything that would make the damage or cleanup extensive unless it is absolutely necessary to protect human health or life. This also means weighing general environmental damage against limited property damage.
2. Do not assign an employee to take an action unless he or she is properly trained and has the necessary protective equipment. To do otherwise could result in serious injury to your fellow employee. This rule can be violated voluntarily in order to protect a human life.
3. Do only what you have been trained to do.

All workers must work safely and efficiently; they must remember that excessive speed in the work area is unsafe to all employees, co-workers, and the public.

No employee is to operate any equipment unless properly trained, and then only after receiving the supervisor's permission.

Selected employees are required to have a valid First Aid card in their possession. At least one employee trained in first aid will be on site during working hours.

B.1 SAFETY TRAINING PROGRAM

This section describes the safety training program in use at the facility. See Section V for a description of the general operations training program.

Every K.B. Recycling employee is adequately trained to perform his or her job safely and efficiently. The in-house training program incorporates specific requirements for the facility, and may also include OSHA requirements. For example, the development of an accident prevention program is included in the training program. The accident prevention program includes periodic site staff safety meetings to discuss safety issues, review any hazards identified during site inspections, and evaluate corrective measures for any unsafe condition. The meetings are tailored to the particular operation and attendance is mandatory. An in-house training program will contain the following:

1. All training required by OSHA.
2. Training for employees in the use and location of safety equipment at the site.
3. Training for employees in the emergency response and contingency plan procedures.

In addition to the usual hazards present in an industrial work place, the waste handling system places checkers and loaders in proximity to the waste. Because potentially dangerous materials may be encountered in any waste handling system, K.B. Recycling includes a safety and training program for all such workers. The program defines hazardous waste and other potential hazards. It covers the characteristics of hazardous material - ignitable, corrosive, reactive, and toxic. The program explains methods for identifying, recognizing, and responding in the event that these materials are encountered. A safety officer conducts the training and is available to answer

questions.

In addition, Material Safety Data Sheets (MSDS) are available for hazardous materials stored on-site. The hazardous properties of these materials and the type of precaution to use when handling the material are listed in the MSDS. All employees are informed of the location of MSDS and their function as a part of the employee right-to-know program. This information is provided at the initial training session and is reinforced at safety meetings.

Some employees may wear personal protective equipment that includes but is not limited to: hearing protection, protective eye wear, dust masks, rubber aprons, and gloves. The facility will comply with all applicable federal OSHA requirements for work place health and safety standards and will be inspected by K.B. Recycling and Corporate safety officers for compliance. Emergency eyewash facilities and a decontamination shower will also be located in work areas.

SECTION X – E-WASTE DISPOSAL BAN

Oregon's 2007 Electronics Recycling Law prohibits any person from disposing of computers, monitors and televisions (collectively known as "covered electronic devices" or CEDs) after January 1, 2010. It also prohibits solid waste disposal facility operators from knowingly accepting these devices for disposal after that date, and requires disposal site operators to implement a program to prevent acceptance of these devices for disposal. The following elements make up the program for this company's disposal site.

A. GATE OPERATIONS

The following measures will be taken to discourage delivery of CEDs to the facility for disposal and to identify CEDs that arrive for disposal.

A.1 Signage & Notification

Prior to January 1, 2010, signs will be posted at the entrance, or similar location, of the transfer station alerting all customers of the impending disposal ban. Signs will include the January 1, 2010 effective date of the ban. By January 1, 2010, sign(s) will be posted at the entrance, or a similar location, of the transfer station alerting all customers of the disposal ban and/or modifications will be made to existing signs for already existing banned items. The sign(s) will indicate that the following CEDs are prohibited from disposal:

1. A computer monitor of any type having a viewable area greater than four inches measured diagonally;
2. A desktop computer or portable computer; or
3. A television of any type having a viewable area greater than four inches measure diagonally.

By January 1, 2010, signs will be posted directing customers to the nearest e-waste drop off location for recycle or reuse. Signage will indicate the location of the on-site facility or the address of the closest off-site location.

A.2 Inspection of Incoming Loads

The designated employee (Lead Person) will:

1. Ask the customer if there are any prohibited materials, including CEDs, in the load;
2. Enumerate the entire list of excluded materials for anyone appearing to be unsure or careless in responding;
3. Observe the load for indications of prohibited wastes; and
4. Notify an equipment operator or other designated employee if suspicious of customer or load.

If e-waste is found in a load destined for disposal, the following measures will be implemented to determine where the e-waste originated:

1. Question the driver about the material, if available, and direct the driver to the nearest e-waste drop off location for recycle or reuse.

2. If customer is not available but source of e-waste can be determined, contact customer if there are repeated violations to inform the customer of the disposal ban in order to prevent e-waste in future loads.
3. If no ownership can be established, segregate the waste and haul to the designated e-waste drop off location for recycle or reuse.

B. MANAGEMENT PRACTICES

The following procedures will be taken for safely managing CEDs received for disposal.

B.1 WHOLE OR INTACT CEDs

Whole or intact CEDs found for disposal will be safely removed and transported, where practical, to the on-site or off-site designated e-waste location and placed in sturdy, secure containers such as Gaylords or on pallets which will be periodically reloaded into trucks for transport to recycling facilities. The Gaylord containers and pallets will be secured to minimize damage during shipping. Containers which include any Cathode Ray Tubes (CRTs) not destined for reuse will be labeled (“CRTs for recycling”), stored and shipped according to the CRT regulations. A whole or intact CED destined for disposal will not be removed from the disposal site if the safety of any transfer station employee is jeopardized, as determined by the on-site supervisor.

B.2 BROKEN CATHODE RAY TUBES

When broken CEDs or CRTs are found for disposal the following procedures will be implemented. Broken CRTs: A CRT is broken if the glass is broken or the vacuum seal has been released. These should be managed as used, broken CRTs and, if possible, the following procedures should be taken.

1. Segregate and remove the waste in a safe manner. For example, clean up of broken CRTs at transfer stations or material recovery facilities includes:
2. Using appropriate protective equipment to protect personnel, carefully scoop up the material using stiff paper and place into glass jar with a metal lid or in a double sealed plastic bag.
3. Use sticky tape, such as duct tape, to pick up any remaining small glass fragments and powder.
4. Wipe the area clean with damp paper towels or disposable wet wipes. Place towels in the glass jar or plastic bag.
5. Store and prepare for shipment by placing CRTs in suitable containers to prevent release of hazardous constituents and label the container with the words “Broken CRTs for Recycling,” as required by the CRT regulation.
6. Ship in accordance with CRT regulations.

Broken CEDs (i.e. computer towers and other non-CRTs): the CED will be safely removed, where feasible, and placed in the designated on-site or off-site e-waste location for recycling or reuse.

Severely Damaged CEDs: A CED is too severely damaged to be reused or recycled when either 1) it cannot be identified as a CED, 2) the CED is no longer “whole or intact”, or 3) removal of the CED for reuse or recycling places the safety of the customer or transfer station employee at

risk. Severely damaged CEDs will be disposed of in a way that poses the least amount of risk to the transfer station customers and its employees.

B.3 TRAINING

The following is a description of the training program for employees who will/may come in contact with CEDs in the employee's normal course of operations. This training will be conducted with such employees annually and at the hiring of such employees.

1. **Recordkeeping:** Provide each employee with a copy of the "E-Waste Disposal Ban" Section of the Operations Plan. Have employees read, sign, and date a copy of the "E-Waste Disposal Ban" Section of the Operations at the end of employee training.
2. **Identification of CEDs:** Show employees, either with a picture or visual, a whole desktop, portable computer, television, and monitor, both flat-screen and cathode ray tube (CRT), with a viewable area greater than four inches measure diagonally.
3. **Inspection of Incoming Loads:** Tell employees what questions to ask of customers with incoming loads (refer them to the "Gate Operations" section of addendum).
4. **Handling incoming CEDs:** Tell employees how to handle CEDs that are found for disposal by reading the "Management Practices" section of this addendum and answering any questions employees may have about the procedures.
5. **Cleaning Up Broken CEDs:** Show employees how to properly clean up broken CEDs, as outlined in the "Management Practices" section of the operations plan.

APPENDIX

- A. Litter control for waste-related uses
- B. Dust, Mud, Vector Control
- C. Odor Control Plan
- D. Unacceptable Waste Exclusion Plan
- E. Special Waste Management Procedures Plan
- F. Spill Response Plan

Litter Control for Waste-Related Uses

A two-man litter control program is maintained daily for all areas within the K.B. Recycling site. Litter control is constantly monitored with areas being addressed as incidences occur. Regular routes covering the perimeter of the site are maintained daily. The immediate area from Clackamas Street out to 98th Avenue is monitored daily and litter and fresh waste are picked up as incidences occur. Upon observation or notification of illegally dumped waste products (dry waste) near the K.B. Recycling site, the litter patrol is sent out to clean up the identified area. All materials are put into the waste stream at K.B. Recycling.

A tag is issued to all non-commercial vehicles coming into the K.B. Recycling site that are not tied down or covered in order to minimize littering from the vehicle. The tag asks them to please tie down or cover their loads in the future to help control litter on our roadways.

All commercial vehicles coming into the site are either covered with tarps or completely enclosed in order to minimize any discharge of material. This meets the Clackamas County requirements for waste-related vehicles.

Dust, Mud, Vector Control

The dust and mud control is maintained by an outside sweeping company which has regular service days. The service days are Monday through Friday and cover all areas of the site. Since the area is all asphalt, there is a minimal amount of problems that occur on site.

Pest control is maintained by an outside firm which conducts regular service to the site on a quarterly basis. If any unusual situations occur, the Pest Control Company can respond on a daily or weekly basis if needed. Minimal problems have been noted in the past for this site. Mosquito abatement is handled by the same firm which will respond as needed. Checks are done in the spring for any potential problems.

Odor Control Plan

While neither odor nor odor control has been an issue of concern at K.B. Recycling facilities, the Company will abide by the following procedures for minimizing and controlling odors at the facility:

1. Putrescible waste transferred to Metro facilities. All Putrescible waste must be sent to a Metro approved landfill or disposal site, therefore, K.B. Recycling does not receive such waste intentionally. In the unlikely event that the K.B. Recycling facility receives a load containing a significant amount of decomposing material that may soon emit objectionable odors, the Company will immediately place such a load in a covered container and transfer it to one of the Metro approved facilities handling Putrescible waste. The Company will make no effort toward material recovery as to such a load.
2. Odor complaint triggers immediate identification and containment procedure. If K.B. Recycling receives an odor complaint, the company will log it in the complaint log. The site manager or his or her designee will attempt to determine what waste materials were

received during the period of the complaint by reviewing the scale tickets. If the scale tickets identify nothing unusual, then the site manager will interview the spotters to determine if they identified anything out of the ordinary. If the site manager identifies an offending load that is still on-site, the Company will load it into a trailer or container and ship it off-site for disposal. Results of all such searches, whether or not they produce a positive identification, will be noted in the complaint log.

3. No yard debris allowed. The conditional use permit for this facility specifically prohibits the Company from accepting yard debris. Spotters will be trained to reject any loads that contain yard debris. If any incidental yard debris is received at the facility, it will be reloaded into drop boxes and taken to a DEQ approved yard debris handling or composting facility.
4. Litter control minimizes odor. The Company maintains a daily two-person litter control program for all areas on the site. The entire facility and surrounding areas are constantly monitored for the presence of litter. Particular attention is given to the area from Clackamas Street to 98th Avenue, where trucks drive to access the site. Upon observation or notification of illegally dumped dry waste products near the site, the litter patrol immediately cleans up the identified area. All materials are put into the waste stream at K.B. Recycling.

The Company issues a tag to all non-commercial vehicles coming into the site that are not tied down or covered in order to minimize littering from the vehicle. The tag asks these non-commercial customers to tie down or cover their loads in the future to help control litter on our roadways. All commercial vehicles coming into the site are either covered with tarps or completely enclosed in order to minimize any discharge of material. This meets the Clackamas County requirements for waste related vehicles.

Unacceptable Waste Exclusion Plan

The MRPF is designed to process source separated recyclables, construction and demolition debris and other dry non- Putrescible waste, and inert materials. This plan establishes procedures for managing wastes that are not suitable for processing at the facility.

1. Purpose

The purpose of the Unacceptable Waste Exclusion Plan is threefold:

- To prevent unacceptable waste from entering the recyclable stream,
- To detect unacceptable waste that has entered the facility, and
- To safely manage unacceptable waste that has been removed from the recyclable stream.

Unacceptable waste includes all hazardous waste, unapproved or improperly handled special waste, untreated infectious waste, liquid waste, tires, and any other waste not authorized for disposal by those governmental entities having jurisdiction.

2. Prevention

The most effective way to eliminate unacceptable waste from the facility is to prevent its initial entry. K.B. Recycling has implemented the following methods to prevent unacceptable waste from entering the facility:

- A. Customer Survey and Education
- B. Special Waste Program
- C. Signs
- D. Inspection of Loads
- E. Spotter

3. Detection

If unacceptable waste is discovered in the recyclable, efforts are made to remove that waste as soon as possible. Early detection increases the likelihood of identifying the waste generator. Unacceptable waste detection will be performed by collection vehicle drivers, the MRF spotter, and other K.B. Recycling staff who have occasion to view the recyclable stream.

K.B. Recycling & Third Party Drivers

Drivers are the first line of defense for detecting and removing unacceptable waste from the recyclable stream. Prior to transporting a customer's material, roll-off drivers will usually inspect the visible portion of each load for unacceptable waste. If the driver suspects that a load might contain unacceptable waste, he or she should immediately contact dispatch for instructions.

Spotter/Sorter

A spotter/sorter will observe tipping operations at the MRF. The spotter/sorter must have specified safety equipment readily available. As waste from commercial and industrial sources is dumped onto the tipping floor, the spotter/sorter will carefully scrutinize the material for unacceptable waste that may be contained in the load. Suspected unacceptable waste will be handled by the procedures identified in Section 4.

The MRPF Facility Manager will designate and train staff members who will be assigned as spotters/sorters. The training will include detection, recognition, identification, and handling of suspected unacceptable and hazardous waste. The training will also include use of protective clothing and equipment.

Personnel

All other MRPF personnel will receive annual training in the recognition of unacceptable waste. As these personnel perform their daily tasks, they should watch for unacceptable waste and notify the spotter or their supervisor if they suspect a waste is unacceptable.

4. Managing Unacceptable Wastes

There are two possible scenarios for the management of unacceptable waste:

Scenario 1 -Generator Known:

If the generator or hauler can be identified, they will be directed to safely load and remove the unacceptable material, so it can be managed properly. Generators will be directed to Oregon Department of Environmental Quality or Metro, as appropriate, for assistance in finding appropriate handling or disposal of their wastes.

Scenario 2 -Generator Unknown:

In spite of K.B. Recycling prevention and detection programs, a situation may occur in which unacceptable waste is discovered and the generator cannot be identified. In this case, the waste will be identified, if possible, and the risks associated with handling and storage will be taken into account. If the material is known or suspected to be hazardous, the following procedures will be followed:

The Facility Manager will contact the company Environmental, Health & Safety Manager at 503-659-7004 for assistance with waste characterization and designation, and to determine if there are any dangers inherent in moving and storing the waste. The Facility Manager will seek a Special Waste Decision from the Environmental, Health & Safety Manager. The decision will designate the waste and provide handling and disposal conditions.

If the suspect waste is determined to be a regulated dangerous waste, a licensed hazardous waste service provider will be contacted to arrange for recycling or disposal.

If the unacceptable waste is determined to be a non-regulated waste, it will be disposed of as municipal solid waste.

A. Handling

Unacceptable wastes will be handled in a manner appropriate to the risks of handling and/or storing the material. This will be determined on a case-by-case basis in consultation with the Facility Manager and the Environmental, Health & Safety Manager. A licensed hazardous waste service provider will be contacted to handle wastes which require use of HAZMAT techniques.

B. Storage

The designated unacceptable waste storage area is an area where suspected hazardous waste can be isolated and protected from the environment. In addition, the storage area will meet the following criteria: The storage area can be properly secured when an authorized attendant is not present.

C. Disposal

The unacceptable waste will be designated to determine whether it is a hazardous or non-hazardous waste.

5. Recordkeeping

When an unacceptable waste is isolated from the waste stream, the waste container will be assigned a unique identifying number and the following information will be recorded in material recycling facility's Unacceptable Waste Log:

(1) the truck number; (2) the date the waste was discovered; and (3) a description of the waste (include hazard, volume, and anything written on the container). The final disposition and date of disposition must also be recorded.

6. Criteria for Accepting or Rejecting Loads This facility accepts and processes loads having the following characteristics:

- Dry nonputrescible construction and demolition (C&D) waste. C&D waste means solid waste resulting from the construction, repair, or demolition of buildings, roads and other structures, and debris from the clearing of land. Such waste typically consists of materials including concrete, bricks, bituminous concrete, asphalt paving, untreated or chemically treated wood, glass, masonry, roofing, siding, plaster; and soils, rock, stumps, boulders, brush and other similar material.
- Source separated recyclables that are collected via the Portland area curbside recycling programs and commercial recycling programs.
- Clean fill. Clean fill means material consisting of soil, rock, concrete, brick, building block, tile or asphalt paving, which do not contain contaminants which could adversely impact the waters of the State or public health.
- No other wastes shall be accepted unless specifically authorized in writing by all regulatory authorities with jurisdiction.

This facility rejects any load if:

- The load contains hazardous waste, which includes the following:

(a) Discarded, useless or unwanted materials or residues resulting from any substances or combination of substances intended for the purpose of defoliating plants or for the preventing, destroying, repelling or mitigating of insects, fungi, weeds, rodents or predatory animals, including but not limited to defoliants, desiccants, fungicides, herbicides, insecticides, nematocides and rodenticides.

(b) Residues resulting from any process of industry, manufacturing, trade or business or government or from the development or recovery of any natural resources, if such residues have been classified as hazardous by any government authority with jurisdiction.

- The load contains "Industrial Solid Waste", which means solid waste generated by manufacturing or industrial processes. Such waste may include, but is not limited to, waste resulting from the following processes: Electric power generation; fertilizer/agricultural chemicals; food and related products/by-products; inorganic chemicals; iron and steel manufacturing; leather and leather products; nonferrous metals manufacturing/foundries; organic chemicals; plastics and resins manufacturing; pulp and paper industry; rubber and miscellaneous plastic products; stone, glass; clay and concrete products; textile manufacturing; transportation equipment; water treatment; and timber products manufacturing. This term does not include construction/demolition waste; municipal solid waste from manufacturing or industrial facilities such as office or "lunch room" waste; or packaging materials for products delivered to the generator.
- The load contains "Commercial Solid Waste", which means solid waste generated by

stores, offices, including manufacturing and industry offices, restaurants, warehouses, schools, colleges, universities, hospitals, and other nonmanufacturing entities.

- The load contains "Domestic Solid Waste", which includes, but is not limited to, residential (including single and multiple residences), commercial and institutional wastes. This restriction does not include dry, nonputrescible building demolition or construction wastes.
- The load contains "Putrescible Waste", which means solid waste containing organic material that can be rapidly decomposed by microorganisms, and which may give rise to foul smelling, offensive products during such decomposition or which is capable of attracting or providing food for birds and potential disease vectors such as rodents and flies.
- The load contains "Cleanup Materials Contaminated by Hazardous Substances", which means contaminated materials from the cleanup of releases of hazardous substances into the environment, and which are not hazardous wastes as defined above.
- The load contains asbestos-containing materials.

Special Waste Management Procedures

KB screens all incoming waste materials to detect any unacceptable waste that may have been tipped onto the transfer floor and to safely manage those unacceptable wastes that have been detected at the facility. Unacceptable wastes are segregated for proper characterization and management. A log of such materials will be filled out for each incident.

Any liquids or other unacceptable wastes are to be removed from the load prior to dumping, and returned to the customer after they have disposed of their load. The customer will not be allowed to proceed to the tipping floor until unacceptable materials have been isolated from the waste load.

Solid Waste Containing Friable Asbestos

Asbestos Training is conducted in compliance with DEQ standards (See Addendum 1). Friable asbestos shall be isolated from the general waste and returned to the customer. If the quantity is sufficient that separation may cause fugitive dust, the entire load shall be rejected, and the customer directed to arrange for disposal at an approved landfill. If asbestos is observed in waste on the floor, the spotter will immediately contact a supervisor after clearing people away from the area. Wind patterns will be noted when directing traffic away from the area making sure that people are positioned upwind from the material in question. A qualified contractor will be engaged to remove this material for proper disposal.

Solid Waste Containing Non-friable Asbestos

When a load is dumped on the floor and the operators identify suspected non-friable ACM in a waste load, the following procedures will be followed:

- The suspected material will be isolated, taking care not to disturb or cause deprecation to the material by minimizing the mechanical handling;
- Wet the material with water to prevent fiber emissions;
- As soon as possible load material directly into trailer;
- Immediately cover suspected material with solid waste to prevent escape of emissions and dust;
- Notify disposal site of trailer containing suspected non-friable ACM prior to shipping the load.

Infectious wastes and explosives, including small arms ammunition are not accepted under any circumstances.

Spill Management Plan

Leaks and spills at the transfer station are most likely to be caused by defective or broken equipment hoses or vehicle collisions. The substances most likely to be released include: hydraulic fluid, diesel fuel, and motor oil or radiator fluid. The preventive maintenance program for equipment helps minimize potential releases or spills.

If a spill or leak occurs, efforts will be taken to prevent the released substance from entering the sewer and storm water collection points. All employees will be trained in spill response activities. The facility will be equipped with spill response equipment including: containment booms, absorbent pads and granular floor sweep. Contaminated absorbent materials and collected residual product will be handled and disposed of in compliance with permit conditions and applicable laws and regulations.

If a reportable spill occurs then the Oregon Emergency response System (OERS)

Will be notified at 1-800-452-0311. A reportable spill includes:

- Any amount of oil to waters of the state;

- Oil spills on land in excess of 42 gallons;
- Hazardous materials that are equal to, or greater than, the quantity listed in the Code of Federal regulations, 40 CFR Part 302(List of Hazardous Substances and Reportable Quantities), and amendments adopted before July 1, 2002.

When the spill is reported the following information will be provided:

- Type of oil or hazardous material
- Quantity
- Location of spill (land or water)
- Names and phone numbers

ADDENDUM 1

- A. Initial asbestos training form
- B. Annual asbestos training form

K.B. Recycling, Inc.
PO BOX 550
Canby, OR 97013

Initial Training – Two Hour Version

Date

Re: Asbestos Awareness Training

On **DATE**, **K.B. Recycling, Inc.** provided a two-hour initial training session on asbestos awareness, including screening Oregon Refuse and Recycling Association’s PowerPoint presentation, “Asbestos Awareness.”

The training included discussion of the health effects of friable asbestos, recognition of asbestos-containing materials and presumed asbestos-containing materials and the proper response to discovering friable asbestos and any friable asbestos fiber release episode.

The following individuals attended the Asbestos Awareness Training class held at **LOCATION OF TRAINING**:

Name

Date of Birth

Signed by:

Name:

Title:

Annual Refresher Training – No time requirement specified

K.B. Recycling, Inc.

PO BOX 550

Canby, OR 97013

Date

Re: Asbestos Awareness Training

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Title: