

September 20th, 2018

Roy W. Brower, Director
Solid Waste Information, Compliance, & Cleanup
Metro

I am reaching out to you with a matter of great importance. GSS Transfer would like to request a tonnage increase at our transfer station to 49,000 tons annually effective January 1st, 2019.

We are requesting 2 separate council action items:

1. Increase Facility Tonnage Authorization
2. Increase Facility wet tonnage allocation (under the non-systems license to Wasco)

The additional tons will primarily be generated in Gresham and East Multnomah County and will have several benefits for haulers and ratepayers due to the tip fee differential compared to other options.

First, the operational savings of truck costs and disposal fees of haulers that are driving loads to Vancouver or Metro South is significant. The reduced drive times will also decrease the environmental and traffic impact of the additional driving distance.

Second, the increased Community Enhancement Fee would be of great use to the City of Gresham and help GSS Transfer to reinvest in the community.

Lastly, the additional tons will increase GSS Transfer's ability to be a sustainable, locally owned business.

The immediate cost reductions can be forecasted for the 2019 rate review and will have significant benefit to ratepayers. We have one written (see attached) and one verbal commitment from other haulers to bring tons to our facility making the new tonnage cap easily attainable. The City of Gresham also supports our efforts to increase the tonnage at GSS Transfer.

We appreciate and understand the work Metro has done for the 2020 allocation methodology and that imposing changes before its inception may be challenging. But, I feel the benefits to East Multnomah County business and residents are far greater than the inconvenience. The change is consistent with the spirit of the proposed 2020 methodology.

Furthermore, if approved, we would like to have these additional tons fall under the 10% exempt NSL tonnage allocation to take the additional tons to the Wasco County Landfill.

If you have any questions regarding this matter, please contact me at (503) 209-3932.

Sincerely,

Matt Miller

A handwritten signature in black ink, appearing to read 'Matt Miller', with a long horizontal line extending to the right.

General Manager – GSS Transfer



Solid Waste Facility Franchise Application

Application packet for a new franchise,
franchise renewals, and change of authorization requests for:

- Transfer Station
- Food waste processing facility
- Disposal Site
- Energy recovery facility

Issued June 2016

Metro
600 NE Grand Ave.
Portland, OR 97232-2736
503-797-1835

Facility Franchise Application



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This packet contains an application for a Metro Solid Waste Facility Franchise. You may also want to review the relevant sections of the Metro Code. Metro Code Chapter 5.01 identifies which solid waste facilities and activities require a Metro franchise. You can access the Metro Code via the Metro web site at www.oregonmetro.gov/metro-code.

Generally, a solid waste facility within the Metro boundary may operate only if Metro authorizes it under a License or Franchise.

Metro staff will review an application for completeness within 15 business days of receipt and notify the applicant whether their application is deemed to be complete. If an application is incomplete, Metro will notify the applicant as to what additional information is required.

Application for a new Solid Waste Facility Franchise

An applicant seeking a new Metro Solid Waste Facility Franchise must first participate in a pre-application conference prior to submitting a final application form. The purpose of the pre-application conference is for Metro to obtain a description of the proposed solid waste facility and provide the applicant with information regarding the applicable requirements for the proposed operation. The conference also provides the applicant with an opportunity to discuss the application process and to identify any potential issues specific to its proposal. An applicant should prepare for the pre-application conference by reviewing the application forms and drafting answers before the conference. To schedule the pre-application conference, contact Metro's Solid Waste Compliance and Cleanup Division at 503-797-1835.

After completing the pre-application conference, an applicant seeking a new franchise must submit to Metro a completed *Solid Waste Facility Franchise Application* form and provide all additional information as required. Metro will generally approve or deny a new franchise within 120 days after Metro deems the application to be complete. The fee for filing a franchise application is \$500. See Metro Code Chapter 5.01 for more information regarding the issuance of franchises.

Renewal of an Existing Franchise

A franchisee seeking to renew an existing franchise without substantive changes to the current authorization must submit a completed *Solid Waste Facility Franchise Application* form and provide all additional information as required, unless Metro staff directs otherwise. A franchisee may submit a franchise renewal application not less than 120 days before the current franchise expires. If a franchisee fails to timely submit a renewal application, the franchisee's authority to operate may lapse. Additionally, the Chief Operating Officer is not obligated to renew a franchise earlier than the expiration date of the existing franchise even if the franchisee files a renewal application more than 120 days before the existing franchise expires. The fee for filing a franchise renewal application is \$500. See Metro Code Chapter 5.01 for more information regarding the renewal of franchises.

Change of Authorization to an Existing Franchise

A franchisee seeking a change in authorization of an existing franchise (other than a renewal) must submit to Metro a completed *Solid Waste Facility Franchise Application* form and provide all additional information as required unless Metro staff directs otherwise. The applicant cannot implement the requested change of authorization until Metro approves it in writing. The fee for filing a change of authorization application is \$100. See Metro Code Chapter 5.01 for more information regarding changes of authorization for franchises. Metro may require the applicant to apply for a new license if there is a significant change in the types of solid waste accepted or activities performed at a facility.

Transfer of Ownership or Control of an Existing Franchise

A franchisee seeking to transfer ownership or control of an existing franchise must submit to Metro a completed *Solid Waste Facility Franchise Application* form and provide all additional information as required unless Metro staff directs otherwise. The franchisee may not transfer ownership or control of an existing franchise until Metro approves it in writing. See Metro Code Chapter 5.01 for more information regarding transfer of ownership for franchises.

Facility Franchise Application



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INSTRUCTIONS

1. Complete Parts 1-3 of application.
2. Verify information is accurate and application is complete.
3. Sign page 17 of application.
4. Include application fee payment
5. Submit application and payment to:
Metro
Solid Waste Compliance and Cleanup
600 NE Grand Avenue
Portland, OR 97232-2736
Tel: (503) 797-1835
Fax: (503) 813-7544
SWCC@oregonmetro.gov

Metro use only

DATE RECEIVED:

SEP 21 '18 RCVD

DATE DEEMED COMPLETE BY METRO:

NOV 28 2018

PART 1 – Standard Franchise Application Information

1. Type of Application (please check one)	
<input type="checkbox"/>	New franchise Date of Pre-Application Conference: :
<input type="checkbox"/>	Renewal of an existing franchise Solid Waste Facility Franchise Number: _____
<input checked="" type="checkbox"/>	Change of authorization to an existing franchise (other than a renewal) Please describe the proposed change below in Section 3.
<input type="checkbox"/>	Transfer of ownership or control of an existing franchise

2. Type of facility (please check one)	
<input checked="" type="checkbox"/>	Transfer Station
<input type="checkbox"/>	Food Waste Processing Facility
<input type="checkbox"/>	Other (please specify):

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3. If seeking a change of authorization to an existing franchise, please explain the proposed change below (attach additional pages if necessary). Complete all remaining sections of this form as they pertain to the request.

GSS Transfer requests that our tonnage authorization for wet waste be increased to 49,000 tons per year. We have expanded our facility and equipment to easily accommodate the requested additional tons. As detailed in the 6/18/2018 Transfer Capacity report prepared by Bob Carn of J.R. Miller & Associates, our facility is now able to receive and transfer about 80,000 tons per year. In addition to the Transfer tipping floor bay expansion described in Bob Carn's report, we have added a new loader, excavator and yard tractor to enhance our loading capacity.

As further detailed in the attached letter, we also request that our wet waste tonnage allocation be increased to 49,000 tons per year for 2019.

4. Applicant (Franchisee)

Facility Name:	GSS Transfer, LLC.
Company Name:	GSS Transfer, LLC.
Street Address:	2131 NW Birdsdale Ave
City/State/Zip:	Gresham, OR 97030
Mailing Address:	PO Box 1560
City/State/Zip:	Gresham, OR 97030
Contact Person:	Matt Miller
Phone Number:	503-665-2424
Fax Number:	503-666-0917
E-mail Address:	matt@greshamsanitary.com

5. Franchisee's Owner or Parent Company (provide information for all owners)

Name:	Michael & Deborah Miller-Gresham Sanitary Service, Inc.
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Address:	PO Box 1560
City/State/Zip:	Gresham, OR 97030
Phone Number:	503-665-2424
E-mail Address:	matt@greshamsanitary.com

6. Site Operator (if different from Franchisee)

Company Name:	Same
Contact Person:	
Street Address:	
Mailing Address:	
City/State/Zip:	
Phone Number:	
Fax Number:	
E-mail Address:	

7. Site Description

Tax Lot(s): 1S3E05AD 01500, 01600, 01700 & 1S3E05DA 00100	Section: 5	Township: IS	Range: 3E
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8. Land Use

Present Land Use Zone:	Heavy Industrial	
Is proposed use permitted outright?	<input checked="" type="checkbox"/> Yes If yes, attach a copy of the <i>Land Use Compatibility Statement</i> (see Attachment E).	<input type="checkbox"/> No
Is a conditional use permit necessary for the facility?	<input type="checkbox"/> Yes If yes, attach a copy of the <i>Conditional Use Permit</i>	<input checked="" type="checkbox"/> No
Are there any land use issues presently pending with the site?	<input type="checkbox"/> Yes If yes, please explain the land use issues below.	<input checked="" type="checkbox"/> No

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Description of the pending land use issues identified above:		
Are any DEQ permits required?	<input checked="" type="checkbox"/> Yes If yes, please list all DEQ permits below and attach copies with this application (see Attachment G).	<input type="checkbox"/> No
Listing of all required DEQ permits:	DEQ Transfer Station Permit #1392. DEQ Storm Water Permit UIC#13410	
Are any other local permits required?	<input type="checkbox"/> Yes If yes, please list all other required permits below and attach copies with this application (see Attachment H).	<input checked="" type="checkbox"/> No
Listing of other required permits:		

9. Land Owner		
Is the applicant the sole owner of the property on which the facility is located?	<input checked="" type="checkbox"/> Yes Michael and Deborah Miller are primary shareholders and officers in both GSS Transfer and Gresham Sanitary Service.	<input type="checkbox"/> No If no, please complete this section and attach a completed <i>Property Use Consent Form</i> (see Attachment F).
Property Owner:	Michael and Deborah Miller	
Mailing Address:	PO Box 1560	
City/State/Zip:	Gresham, OR 97030	
Phone Number:	503-209-5233	

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10. Public/Commercial Operations

Will the facility be open to the public (i.e., non-commercial self-haul customers)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Will the facility be open to non-affiliated commercial solid waste collectors?	<input checked="" type="checkbox"/> Yes	No
Will the facility be open to solid waste collection companies that collect waste from outside the boundary of Metro?	<input checked="" type="checkbox"/> Yes	No

11. Operating Hours and Traffic Volume

	Public (non-commercial self-haul)	Commercial Affiliated	Commercial Non-Affiliated
Operating Hours	N/A	5AM to 4PM	5AM to 4PM
Estimated Vehicles Per Day	N/A	14	15

12. Inbound Waste by Generator

Identify the expected annual tonnage amount of waste that the facility will receive and recover from the following types of generators.

Generator	Tons Received	Tons Recovered	Tons Residual
Agricultural:	0	0	0
Commercial:	29,000	0	29,000
Industrial:	100	0	100
Residential:	19,900	0	19,900
TOTAL TONS:	49,000	0	49,000

Facility Franchise Application

13. Inbound Waste by Type

Identify the types of waste and annual tonnage amounts of each that the applicant expects to receive at the facility. Also, identify how the applicant will manage each waste stream and the expected tip fees that the applicant will post at the facility (attach additional pages if necessary).

Waste Type	Accepted at Facility	Expected Annual Tonnage Amount	Type of Activity to be Performed on Waste	Expected Tip Fee (per Ton)
Non-Putrescible Waste:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Putrescible Waste:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	49,000	Transfer	\$97.45
Source-Separated Recyclables:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Source-Separated Yard Debris:	Yes <input checked="" type="checkbox"/> No			
Source-Separated Food Waste mixed with Yard Debris:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Source-Separated Food Waste:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Source-Separated Wood:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Special Wastes:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Inerts (e.g., rock, concrete, etc.):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Petroleum Contaminated Soil:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

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Other Waste (please specify):	<input type="checkbox"/> Yes	<input type="checkbox"/> No			
Other Waste (please specify):	<input type="checkbox"/> Yes	<input type="checkbox"/> No			

14. Outbound Waste, Products, and By-Products

List the expected destination and amount of each type of outbound solid waste, products, or by-products that the applicant expects to transport from the facility (attach additional pages if necessary).

Destination Site (Name and address)	Waste /Product/By- Product Type	Expected Annual Tonnage	Purpose of Delivery*
Wasco County Landfill 2550 Steele Rd, The Dalles, OR 97058	Putrescible Waste:	49,000	Disposal
Coffin Butte Landfill 29175 Coffin Butte Rd, Corvallis, OR 97330	Putrescible Waste:	Unusual Circumstance or Emergency use only	Disposal

*For example: disposal, recovery, composting, beneficial use, etc

15. Subcontractors

Provide the name, address and function of all subcontractors involved in the facility operations:

NAME	ADDRESS	FUNCTION

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PART 2 – Standard Attachments to Franchise Application (Franchise application continued)

- Metro requires the following attachments (Attachments A – I) for new applications in order for Metro to deem a franchise application complete. The applicant must clearly label each attachment.
- Application submittals such as facility design, building plans, site plans and specifications must be prepared, as appropriate, by persons licensed in engineering, architecture, landscape design, traffic engineering, air quality control, and design of structures.
- An applicant seeking to renew an existing franchise without substantive changes to the current authorization may defer to previously submitted documents if Metro has the most current version of all attachments (Attachments A- I) on file, unless otherwise directed by Metro staff. The date of the document on file with Metro is required for each deferred attachment. To confirm that Metro has current documentation on file, please contact Metro's Solid Waste Compliance & Cleanup Division at (503) 797-1835 or via email at SWCC@oregonmetro.gov.

ATTACHMENT A: SITE PLAN

The applicant must submit a facility site plan that includes maps or drawings showing the location of the facility and the site layout according to scale using a scale no smaller than one inch being equivalent to 30 feet. Applicant must provide the location of the following items on the site plan:

- | | |
|-----|------------------------------------|
| (1) | Boundaries of the facility. N/A |
| (2) | Property boundaries, if different. |

Facility Franchise Application

- | | |
|------|---|
| (3) | All buildings on the property (existing and proposed) and other pertinent information with respect to the operation of the facility, to include: <ul style="list-style-type: none">a) scale and scale house location.b) fencing and gates. access roads..c) paved areas.d) vegetative buffer zones and berms .e) sorting line and other major materials recovery equipment.f) intake, processing, and product/by-product storage . |
| | g) All receiving, processing, reload and storage areas, as applicable, for solid waste, source-separated recyclable materials, yard debris, recovered materials, products/by-products, waste residuals, exterior stockpiles, hazardous waste, and other materials. |
| | h) All exterior material stockpile footprints, material types stored outside, and maximum height of each stockpile. |
| (4) | Water sources for fire suppression. |
| (5) | Load checking areas. |
| (6) | Storage areas for the temporary containment of prohibited waste that the facility inadvertently receives, while awaiting proper removal or disposal of the prohibited waste. The facility must cover and enclose the containment areas and construct them in a manner to prevent leaking and contamination. |
| (7) | Identification of on-site traffic flow patterns. |
| (8) | Facility signage. Facility signs must: <ul style="list-style-type: none">a) display all of the information required by Metrob) be posted at all public entrances to the facility; andc) conform with local government signage regulations |
| (9) | The location of all commercial and residential structures within a one mile radius of the composting facility, identified on a map or aerial photograph. (Compost facility only). |
| (10) | The prevailing wind direction, by season, identified on a map or aerial photograph. (Compost facility only).. |

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the Site Plan on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

ATTACHMENT B: FACILITY DESIGN PLAN The applicant must submit a facility design plan to address the following:

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- (1) An applicant seeking a franchise must submit a written descriptions of the following:
 - a) Facility overview.
 - b) Facility design and technology.
 - c) Buildings and major equipment (existing and proposed).
 - d) Construction timeline (as applicable)
 - e) Types of wastes to be processed.
 - f) Residuals management
- (2) A Compost/Anaerobic Digestion/Fermentation facility must submit a written description of the following: (in addition to the items listed above in Subsection 1)
 - a) Feedstock receiving procedures.
 - b) Feedstock pretreatment and contaminant removal procedures and equipment.
 - c) Processing: digestion process and methane recovery, fermentation or composting process.
 - d) Dewatering and liquids management (as applicable).
 - e) Digestate fiber management (as applicable).
 - f) Pathogen reduction / control procedures (as applicable).
 - g) Biogas storage, conditioning and power and/or fuel generation (as applicable).
 - h) Monitoring, quality control and testing procedures.
- (3) Dust, airborne debris and litter.
 - a) Submit a proposed design or existing design plan providing a roofed structure enclosed on at least three sides and an impervious surface (e.g. asphalt, concrete) for the tipping floor, processing (sorting) areas, storage areas and reloading areas.
 - **Compost facility only:** Also, provide locations for compost/curing piles/windrows, digestion, fermentation, aeration systems including bio-filters or enclosed structures to prevent odors from being detected offsite.
 - b) Describe control measures to prevent fugitive dust, airborne debris and litter. Describe how the facility design will provide for shrouding and dust prevention for the receiving area, processing area, storage area, reload area, and all waste processing equipment and all conveyor transfer points where dust is generated.
 - c) Describe any additional facility design measures and procedures for the control of odor, dust, windblown materials, airborne debris, litter and for the handling of the waste and waste by-products in the case of major processing facility breakdown.

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(4) Facility capacity.

- a) Provide engineering plans, reports and specifications to document that the size and configuration of the facility grounds, building and equipment, including the facility layout, drainage structures, building design, and major facility equipment, processing systems and storage areas are of sufficient capacity to accommodate seasonal throughput of all solid wastes and materials that will be delivered to and generated by the facility.
- b) Provide the estimated capacity (cubic yards and tons) of the facility storage area(s) for incoming solid waste waiting to be processed, the estimated capacity (cubic yards and tons) for storage of recovered materials, and the estimated capacity (cubic yards and tons) for storage of processing residual.

(5) Adequate vehicle accommodation.

Provide documentation to demonstrate that the facility will provide adequate on-site areas at the facility's entrance, scales, loading and unloading points and exit points to allow safe queuing off the public roads and right-of-way given the number and types of vehicles expected to use the facility during peak times.

(6) Water contaminated by solid waste and solid waste leachate.

Submit a DEQ (or equivalent) approved plan with pollution control measures to protect surface and ground waters, including runoff collection and discharge and equipment cleaning and washdown water.

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the Facility Design Plan on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

ATTACHMENT C: OPERATING PLAN

The applicant must submit a proposed facility operating plan for Metro review and approval. The applicant must amend the plan if subject to any additional elements required in the franchise - if one is approved and issued. The operating plan must include at a minimum, a detailed description of:

(1) Types of solid wastes the facility will accept.

(2) Methods that the facility will use to measure and keep records of incoming materials at the facility.

(3) A detailed description of how you will distinguish and manage loads of incoming materials.

Facility Franchise Application

- | | |
|-----|---|
| (4) | Procedures for inspecting loads including: <ul style="list-style-type: none">a) Procedures for inspecting incoming loads for the presence of prohibited or unauthorized wastes.
A set of objective criteria for accepting and rejecting loads.b) An asbestos testing protocol for all material that appears as if it may contain asbestos. |
| (5) | Procedures for processing and storage of loads including: <ul style="list-style-type: none">a) Processing of all authorized materials. Include separate descriptions for processing putrescible waste, non-putrescible waste, and source-separated materials – including any food waste and/or food waste mixed with yard debris. Include the material recovery methods and equipment to be used on site (e.g., pre-processing, sorting lines, hand picking, magnets, etc.)b) Reloading and transfer of authorized solid wastes.c) Managing stockpiles.d) Storing authorized materials.e) Minimizing storage times and avoiding delay in processing and managing of all authorized materials including recovered materials. |
| (6) | General markets for the materials recovered at the facility. |
| (7) | Procedures for rejecting, managing, reloading and transporting to appropriate facilities or disposal sites any prohibited or unauthorized wastes discovered at the facility including: <ul style="list-style-type: none">a) Hazardous wastes.b) Other prohibited materials (e.g., unauthorized waste, putrescible waste, special waste).c) Procedures and methods for notifying generators not to place hazardous wastes or other prohibited wastes in drop boxes or other collection containers destined for the facility. |

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(8) Procedures for rejecting or managing loads of food waste that are contaminated with plastic or other non-biodegradable wastes. The operating plan must describe procedures for rejecting, managing, reloading and transporting the following to appropriate facilities or disposal sites:

- a) Loads contaminated with plastics and other non-biodegradable waste.
- b) Processed material that due to concentrations of contaminants cannot be further processed or marketed and must be disposed.

(9) Procedures for odor prevention. The operating plan must establish procedures for preventing all objectionable odors for being detected off the premises of the facility including:

- a) A management plan that the facility will use to monitor and manage all objectionable odors of any derivation including malodorous loads delivered to the facility.
- b) Procedures for receiving and recording odor complaints, immediately investigating any odor complaints to determine the cause of odor emissions, and remedying promptly any odor problem at the facility.

(10) Procedures for emergencies. The operating plan must describe procedures that the facility will follow in case of fire or other emergency.

(11) Procedures for preventing and controlling nuisances, including noise, vectors, dust, litter, and odors. Including a description of how the facility will encourage delivery of waste in covered loads.

(12) Procedures for fire prevention, protection, and control measures used at the facility.

(13) Procedures for pathogen reduction and pathogen testing on end products and by-products (as applicable).

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the Operating Plan on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

Facility Franchise Application



ATTACHMENT D: INSURANCE

The applicant must submit proof of the following types of insurance, covering the applicant, its employees, and agents:

- (1) The most recently approved ISO (Insurance Services Office) Commercial General Liability policy, or its equivalent, written on an occurrence basis. The policy must include coverage for bodily injury, property damage, personal injury, death, contractual liability, premises and products/completed operations. All insurance coverage must be a minimum of \$1,000,000 per occurrence and \$1,000,000 aggregate. Certificate attached.
- (2) Automobile bodily injury and property damage liability insurance must be a minimum of \$1,000,000 per occurrence and \$1,000,000 aggregate. Certificate attached.
- (3) The insurance must name Metro, its elected officials, departments, employees, and agents as ADDITIONAL INSURED on the Commercial General Liability and automobile insurance policies. Certificate attached.
- (4) Certification of Workers' Compensation insurance including employer's liability. If the applicant or franchisee has no employees and will perform the work without the assistance of others, you may attach a certificate to that effect in lieu of the certificate showing current Workers' Compensation. GSS Transfer uses Gresham Sanitary Service employees for operations under a paymaster agreement. A certificate for Gresham Sanitary Service is attached.

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the Insurance on file with Metro dated 6/27/2018 is the most current and accurate version of this document.

ATTACHMENT E: LAND USE COMPATIBILITY STATEMENT (LUCS)

The applicant must submit the following information:

A copy of a completed Metro LUCS or DEQ LUCS. Metro LUCS is available at www.oregonmetro.gov/solidwasteforms.

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the LUCS on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

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ATTACHMENT F: PROPERTY USE CONSENT FORM

The applicant must submit the following information:

If required in Part 1, section 9, of this application. The Property Use Consent Form is available at www.oregonmetro.gov/solidwasteforms.

Not required. Michael and Deborah Miller own the property and are the primary shareholders and officers in both GSS Transfer and Gresham Sanitary Service.

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the Property Use Consent Form on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

ATTACHMENT G: DEQ PERMIT APPLICATIONS AND INFORMATION

The applicant must submit the following information:

A copy of all applications for necessary DEQ permits and any other information required by or submitted to DEQ, including closure plans, financial assurance for the costs of closure of the facility, and conditional use permit or land use compatibility statement, if applicable.

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, the DEQ permit or applications on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

ATTACHMENT H: OTHER REQUIRED PERMITS

The following information must be provided:

A copy of any required permit, license or franchise that a governing body or agency (whether federal, state, county, city or other) has granted or issued to the applicant (not including materials required by Attachment G). If the governing body or agency has not yet issued the required permit, license or franchise, the applicant must provide a copy of the application it submitted. Metro may also request copies of correspondence pertaining to any required permit, license or franchise.

No other permits, licenses or franchises are required for this facility.

FRANCHISE RENEWAL APPLICANTS ONLY:

☒ By checking this box, I certify that to the best of my knowledge, all other required permits on file with Metro dated 9/13/2016 are the most current and accurate version of these documents.

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ATTACHMENT I: CLOSURE PLAN AND FINANCIAL ASSURANCE

The applicant must submit the following information:

- (1) If DEQ requires a closure plan and financial assurance, the applicant must include copies of these documents with the application per Attachment G.
- (2) If DEQ does **not** require a closure plan for the facility, attach a closure document describing closure protocol and associated costs. Closure means those activities associated with restoring the site to its condition before the applicant engaged in the franchised activity. Closure may include, but is not limited to, removal of all on-site solid waste stockpiles accumulated after Metro issued a Metro Solid Waste Facility Franchise. The closure protocol is the written protocol that specifies the activities required to properly close the facility and cease further solid waste activities.
- (3) If DEQ does **not** require any financial assurance for the costs of closure of the facility, applicant must attach proof of financial assurance for the costs of closure of the facility. Cost of closure means the costs associated with restoring the site to its condition before the applicant engaged in the franchised activity.

These costs may include but are not limited to:
 - a) The cost to load and transport accumulated solid waste stockpiles to an authorized disposal site or recycling facility;
 - b) The cost to "tip" the waste at an authorized landfill or recycling facility; and
 - c) Other related costs such as additional disposal costs associated with restoring the site.Examples of acceptable forms of financial assurance include, but are not limited to, the following: surety bond, irrevocable letter of credit, closure insurance, escrow account.

If the DEQ does not issue a permit or require financial assurance, then Metro may waive the requirement for financial assurance if the applicant provides written documentation demonstrating that the cost to implement the closure plan will be less than \$10,000.

FRANCHISE RENEWAL APPLICANTS ONLY:

☐ By checking this box, I certify that to the best of my knowledge, the closure plan on file with Metro dated 9/13/2016 is the most current and accurate version of this document.

PART 3 – Standard Attachment to Franchise License Application (Franchise application continued)

Facility Franchise Application



Metro

600 NE Grand Ave.
Portland, OR 97232
503-797-1835

In accordance with Metro Code Chapter 5.01, Metro considers the following factors to determine whether to issue a solid waste facility franchise. To the extent known by the applicant, please provide any supplemental information about these factors that you want Metro to consider as part of the application.

- 1) Whether the proposed facility and activities will be consistent with the Regional Solid Waste Management Plan.
- 2) The effect that the proposed facility would have on the cost of solid waste disposal and recycling services for the citizens of the Metro region.
- 3) Whether the proposed facility would adversely affect the health, safety and welfare of Metro's residents.
- 4) Whether the proposed facility would adversely affect nearby residents, property owners or the existing character or expected future development of the surrounding neighborhood.
- 5) The compliance history of the applicant and whether the applicant will comply with all of the requirements and standards of Metro Code Chapter 5.01, and other applicable local, state, and federal laws rules, regulations, ordinances, orders, and permits pertaining in any manner to the proposed franchise.

PUBLIC NOTICE AND CONFIDENTIAL INFORMATION

This application and all of the supporting documentation for the proposed solid waste facility is subject to Metro's public notice procedures. Metro will notify and provide the public with an opportunity to review and comment on the proposed application. The public notice may include, but is not limited to, posting the complete application on Metro's website.

The applicant may identify as confidential any reports, books, records, maps, plans, income tax returns, financial statements, contracts and other similar written materials of the applicant that are directly related to the proposed application and that are submitted to or reviewed by Metro. The applicant must prominently mark any information that it claims confidential with the mark "CONFIDENTIAL" before submitting the information to Metro. Subject to the limitations and requirements of ORS Chapter 192 (public records law) and other applicable laws, Metro will treat as confidential any information so marked and will make a good faith effort to not disclose that information unless Metro's refusal to disclose the information would be contrary to applicable Oregon law.

Within five days of Metro's receipt of a request for disclosure of information identified by the applicant (or franchisee) as confidential, Metro will provide the applicant (or franchisee) written notice of the request. The applicant (or franchisee) will have three days within which time to respond in writing to the request before Metro determines, at its sole discretion, whether to disclose any

Facility Franchise Application



Metro

600 NE Grand Ave.
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requested information. The applicant (or franchisee) must pay any costs incurred by Metro as a result of Metro's efforts to remove or redact any confidential information from documents that Metro produces in response to a public records request. These conditions do not limit the use of any information submitted to or reviewed by Metro for regulatory purposes or in any enforcement proceeding. In addition, Metro may share any confidential information with representatives of other governmental agencies provided that, consistent with Oregon law, those representatives agree to continue to treat the information as confidential and make good faith efforts to not disclose the information.

APPLICANT CERTIFICATION:

An authorized agent of the applicant must sign this application. Metro will not accept an application without a signature.

I certify that the information contained in this application is true and correct to the best of my knowledge. I agree to notify Metro within 10 days of any change in the information submitted as a part of this application.

SIGNATURE OF AUTHORIZED AGENT

A handwritten signature in dark ink, appearing to read "Matt Miller", is written over a horizontal line.

TITLE General Manager

PRINT NAME Matt Miller

DATE 9/20/2018 PHONE 503-665-2424

EMAIL matt@greshamsanitary.com

M:\rem\regaff\confidential\ritterh\Applications\Franchise_Application_June2016

Jason Hudson <Jason.Hudson@wasteconnections.com>
To: "Matt Miller (matt@greshamsanitary.com)" <matt@greshamsanitary.com>
Cc: Josh Brown <Joshua.Brown@wasteconnections.com>

Mon, Jul 23, 2018 at 5:19 PM

Matt-

As we discussed over the past few weeks, Arrow Sanitary Service is very interested in delivering more municipal solid waste to Gresham Sanitary Service's transfer station located in Gresham, OR. We have received good service from your facility and your rate is very attractive compared to some of our other disposal options. In addition, Waste Connections values our good working relationship and sees the value of internalizing our volume into Wasco County Landfill. Ultimately, if we are able to delivery you more volume from the Eastside of our service area, including the City of Gresham, our rate payers will benefit through lower tip fees.

After careful consideration, we estimate that if GSS makes the discussed improvements to it's transfer station, that we could deliver up to 15,000 tons per year to the Gresham facility. Arrow Sanitary Service and Waste Connections are committed to working with you and Metro on this increased allocation. We feel that working with GSS is in the best interest of our customers.

Please let me know if you need further information or have any questions. We look forward to growing our business relationship, while at the same time providing value to our customers.

Sincerely,

Jason Hudson

Division Vice President

Waste Connections of Washington Inc.

12115 NE 99th St., Suite 1830

Vancouver, WA 98682

503.318.1572 (c)

360.944.2374 (w)



Waste Connections
of Washington Inc.



Report on Existing Transfer
Station Capacity and Proposed Revision

Prepared By
J.R. Miller & Associates



MAY 2018

TABLE OF CONTENTS

- 1.Existing Station Operations
 - 2.Estimating a Station's Capacity
 - 3.Proposed Revision to Existing Building
 - 4.Future Tonnage
 - 5.Possible Expansion- Planned and Future
 - 6.Summary
- Figure 1

1.0 Existing Station Operations

a. Site Visits and data collection

- i. On May 3rd, 2018, J.R. Miller & Associates (JRMA) visited the GSS transfer station site in Gresham, OR. On this visit, JRMA was given data for a six (6) month period from Nov 1, 2017, to April 25, 2018. The highlights of this data are as follows
 - The net tonnage received and transferred was slightly over 12,000 tons. This was in line with their permitted tonnage of 24,000 tons per year (TPY)
 - The average tonnage for incoming vehicles (5 packer trucks and 3 roll-off trucks) was 5.5 tons per vehicle
 - The average tonnage for outgoing transfer trailers was 29.8 tons per trailers.
 - The peak hours for incoming vehicles was 5am to 6am, 7am to 8am, and 11am to 12pm, resulting in nearly 40% of all incoming waste over a 12+ hour day. These peak hours are different than most Stations and results in the Station not receiving most of their wastes in the 8 am to 2 pm period when their equipment and manpower is readily available
- ii. As a result, on this May 3rd visit from 9:00am to 10:30am, JRMA did not see one incoming vehicle. That is, 1.5 hours when many stations are experiencing truck arrivals which GSS could handle.
- iii. On May 8th, JRMA once again visited the GSS site to observe the truck unloading process and the loading of the transfer trailer. During that time (8:00am to 8:45am), packer trucks and drop box trucks were received, their wastes unloaded onto the tipping floor and then loaded into the transfer trailers
- iv. As can be seen, the peak hours for receiving wastes at a transfer station are normally about 8:00am to 2:00pm on weekdays, however at the GSS station, these normal peak hours only represent about 50% of incoming loads.

- v. It was very obvious that the Station could receive and transfer more wastes on a daily basis if wastes were available anytime from 5:00 am up to 4:00pm.

b. Waste unloading and transfer trailer loading process

- i. Figure 1 illustrates the existing transfer station layout with a ramp down from the roadway to the transfer trailer level, and 2 ramps up to the tipping floor from the roadway. The existing top-load area at the east end of the bldg. is not in use at this time.
- ii. The truck receiving, unloading onto tipping floor, and transfer trailer loading procedure is as follows.
 - The trucks proceed from the scale system to the transfer bldg., reverse up the ramp into Bay 1, unload onto the tipping floor and exit the bldg. This process takes only about 5 to 6 minutes assuming there is no queuing of trucks (such queuing is a very seldom occurrence). The dozer then pushes the wastes from Bay into the transfer trailer which can be done in no more than 5 minutes (note: loads only avg 5.5 tons) and it is a large dozer.

c. Summary:

- This process is very basic and GSS has no problems in transferring 24,000 TPY.
However only 1 vehicle can be unloading at a time.
- The station could transfer more waste per day if required.

2.0 Estimating a Station's Capacity

When determining a Station's capacity, it is common to estimate what one(1) unloading stall can handle over a one hour period, that is VPH, and determine the number of unloading stalls you need to unload for your peak hour period. At present, the Station only has only one (1) unloading stall or space, so it has the following capacity. The following six (6) steps for a truck coming to unload has proven to be a successful approach to estimating the size required for a new station or the capacity of an existing station. It can also used to estimate the queuing length during peak hours if necessary.

1. Time to enter site and proceed to inbound scale
2. Time at inbound scale
3. Time from inbound scale to Transfer Bldg.
4. Time to maneuver into the stall and unload
5. Time to exit Transfer Bldg. and go to outbound scale
6. Time at outbound scale and exit the site

The existing Gresham Station has some features which reduces some of the times to estimate capacity. These are:

- A recent new inbound and outbound scale system that is in excellent condition and a “card system” which reduces the time at the scales.
- An excellent and experienced operations and maintenance staff that has been working at Gresham for many years.
- A site traffic circulation route such that the vehicle unloading and transfer operation is basically separated from other GSS site traffic and operations, but very close in proximity to each other

Based on these features, it is reasonable to estimate that criteria 1) thru 3) can be done in an average of 3 minutes and 5) and 6) can be done in an average of 3 minutes. However, criteria 4) will take an average of 6 minutes. These times are based on viewing the operation. The time to load the wastes from the tipping floor into the transfer trailer can be done while the truck is reversing up and into the stall. This results in a total time of 12 minutes or about 5 vehicles per hour (60/12). With only one stall and vehicles coming to the Station over an 8 to 9 hour day, the Station can receive and transfer 40 to 45 vehicles per day. However, some queuing may occur during a peak hour period. The Station does have some space for queuing. At the present time the Station is only receiving an average of 20 vehicles per day.

3.0 Proposed Revision to Existing Bldg.

GSS has started construction on a project to fill in the top loading bay and construct a floor at the tipping floor level, resulting in an addition of 500+ sq ft of tipping floor space. This revision is shown on Figure 1

With this addition, GSS will be able to utilize both Bays 1 and 2 because the dozer can occupy this new 500+ sq ft while trucks are unloading onto the tipping floor.

With this revision, GSS could almost double their present capacity and be capable of receiving, unloading and transferring up to approximately 45,000 TPY, or, if more wastes were available, be capable of receiving and transferring up to an average of 80,000 TPY. The only items where some additions would need to be made are:

- Even though it would be preferred to receive these additional wastes in the 8: am to 2: pm period, additional wastes could be handled from 5:00 am to 4:00 pm.
- Always maintain a back-up dozer to assist in peak loading times or when the main dozer is "down"
- Add one (1) personnel to remove the transfer trailer when loaded, and replace with an empty trailer utilizing GSS's "goat tractor"

4.0 Future Tonnage

As can be seen with the data provided, there are some definite actions which would need to change for GSS to receive and transfer more than 24,000TPY.

- Expand the existing tipping floor
- As noted earlier, if more wastes were available, they could be delivered anytime between 5:00 am up to 4:00 pm time period.
- We emphasized packer trucks because their payload is normally in the range of 7 tons which is greater than the 5.5 avg tonnage presently coming to the Station.
- An increase of about 20 packer trucks per day would allow GSS to receive and transfer up to 80,000 TPY.

5.0 Proposed Expansion-- Now and Future

There are definitely some expansion possibilities which, if done, would increase the ability to transfer significantly more tonnage on a daily basis. These possibilities are:

Alternative 1 – Revision to existing building, see figure 1. This is all that GSS is doing in the near future. However, there is space on the existing site to do a small addition or a full replacement if the wastes were available.

6.0 Summary

- The existing operations, even though the station is small in size and has peak delivery hours which are different than most stations, is very capable of transferring the permitted tonnage of 24,000 TPY.
- Even with the present operations, the Station is capable of receiving and transferring up to 45,000 TPY if more waste were available.
- The proposed revisions to the existing building, will result in the ability to receive and transfer about 80,000 TPY.
- GSS has a private transportation company who hauls their wastes to the Wasco landfill at a reasonable transportation cost and disposal fee which is beneficial to the City of Gresham and other surrounding communities.
- This Station has been in operation for well over 20 years and has developed very experienced and qualified personnel. Therefore, any additional wastes could be handled in a proper manner.

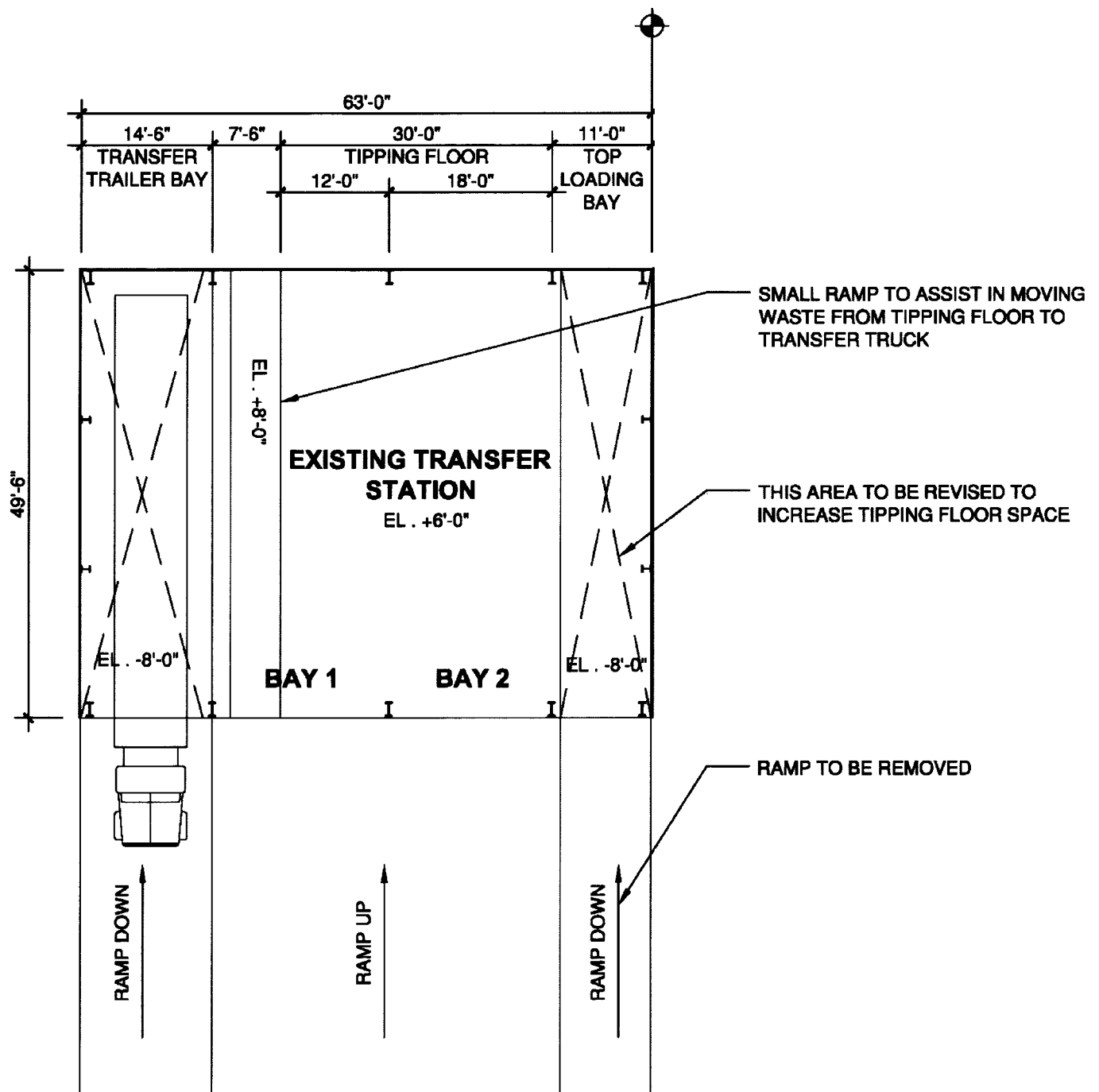


FIGURE 1
 ALTERNATE 1 -
 EXISTING TRANSFER BUILDING



Received
AP 12 2002
City of Gresham - Permit Services

SECTION 1 - TO BE COMPLETED BY APPLICANT (Continued)

Applicant Name: Gresham Sanitary Service

Project Name: Gresham Sanitary (no new development is proposed)

D. Check the type of DEQ permit(s) or approval(s) being applied for at this time.

<input type="checkbox"/> Air Notice of Construction	<input type="checkbox"/> Pollution Control Bond Request
<input type="checkbox"/> Air Discharge Permit (excludes portable facility permits)	<input type="checkbox"/> Hazardous Waste Treatment, Storage, or Disposal Permit
<input type="checkbox"/> Title V Air Permit	<input type="checkbox"/> Clean Water State Revolving Fund Loan Request
<input type="checkbox"/> Parking/Traffic Circulation Plan	<input type="checkbox"/> Wastewater/Sewer Construction Plan/Specifications (includes review of plan changes that require use of new land)
<input type="checkbox"/> Air Indirect Source Permit	<input type="checkbox"/> Water Quality NPDES Individual Permit
<input type="checkbox"/> Solid Waste Disposal Permit	<input type="checkbox"/> Water Quality WPCF Individual Permit (for onsite construction-installation permits use DEQ's Onsite LUCS form)
<input type="checkbox"/> Solid Waste Treatment Permit	<input type="checkbox"/> Water Quality NPDES Stormwater General Permit (1200-A, 1200-C, 1200-CA, 1200-COLS, and 1200-Z)
<input type="checkbox"/> Solid Waste Compost Registration or Permit	<input type="checkbox"/> Water Quality General Permit (all general permits, except 600, 700-PM, 1700-A, and 1700-B when they are mobile.)
<input type="checkbox"/> Solid Waste Letter Authorization Permit	<input type="checkbox"/> Water Quality 401 Certification for federal permit
<input type="checkbox"/> Solid Waste Material Recovery Facility Permit	
<input checked="" type="checkbox"/> Solid Waste Transfer Station Permit	
<input type="checkbox"/> Solid Waste Tire Storage Permit	

E. This application is for: ☐ permit renewal ☒ new permit ☐ permit modification ☐ other: _____

SECTION 2 - TO BE COMPLETED BY CITY OR COUNTY PLANNING OFFICIAL

Please Note: A LUCS approval cannot be accepted by DEQ until all local requirements have been met. Written findings of fact for all local decisions addressed under Item C below are required. Written findings for an activity or use addressed by the acknowledged comprehensive plan in accordance with OAR 660-031-0020 may simply reference the specific plan policies, criteria, or standards that were relied upon in rendering the decision and indicate why the decision is justified based on the plan policies, criteria, or standards.

A. The facility proposal is located: ☒ inside city limits ☐ inside UGB ☐ outside UGB

B. Name of the city or county that has land use jurisdiction (the legal entity responsible for land use decisions for the subject property or land use): CITY OF GRESHAM

C. Does the activity or use comply with all applicable local land use requirements (as required by OAR Chapter 660, Division 31)?

☒ YES, you must complete below or attach findings to support the affirmative compliance decision

i) Relevant specific plan policies, criteria, or standards: There is no main area. 4.012.H is the district. There was a DREN 06-260008 approved.

ii) Provide the reasons for the decision: no new proposed development. It's a 7200 modular building. 2/17/02

☐ NO, you must complete below or attach findings for noncompliance, and identify requirements the applicant must comply with before LUCS compatibility can be determined.

i) Relevant specific plan policies, criteria, or standards: _____

ii) Provide the reasons for the decision: _____

D. Planning Official Signature: [Signature] Title: Senior Planner
Print Name: Laura M. Givens Telephone No.: 503-688-2108 Date: 9/24/02

E. If necessary, depending upon city/county agreement on jurisdiction outside city limits but within UGB:
Planning Official Signature: _____ Title: _____
Print Name: _____ Telephone No.: _____ Date: _____

Department of Environmental Quality
LAND USE COMPATIBILITY STATEMENT (LUCS)

WHAT IS A LUCS? The Land Use Compatibility Statement is the process used by the DEQ to determine whether DEQ permits and other approvals affecting land use are consistent with local government comprehensive plans.

WHY IS A LUCS REQUIRED? Oregon law requires state agency activities that impact land use be consistent with local comprehensive plans. DEQ Oregon Administrative Rules (OAR) Chapter 340, Division 18 identifies agency activities or programs that significantly affect land use and must have a process for determining local plan consistency.

WHEN IS A LUCS REQUIRED? A LUCS is required for nearly all DEQ permits and certain approvals of plans or related activities that affect land use. These permits and activities are listed on p. 2 of this form. A single LUCS can be used if more than one DEQ permit/approval is being applied for concurrently.



State of Oregon
Department of
Environmental
Quality

A permit modification requires a LUCS when any of the following applies:

1. Physical expansion on the property or proposed use of additional land;
2. A significant increase in discharges to water;
3. A relocation of an outfall outside of the source property; or
4. Any physical change or change of operation of an air pollutant source that results in a net significant emission rate increase as defined in OAR 340-200-0020.

A permit renewal requires a LUCS if one has not previously been submitted, or if any of the above modification factors apply.

HOW TO COMPLETE A LUCS:

Step	Who Does It	What Happens
1	Applicant	Completes Section 1 of the LUCS and submits it to the appropriate city or county planning office.
2	City or County Planning Office	Completes Section 2 of the LUCS by determining if the activity or use meets all local planning requirements, and returns to the applicant the signed and dated LUCS form <u>with findings of fact for any local reviews or necessary planning approvals.</u>
3	Applicant	Includes the completed LUCS with <u>findings of fact</u> with the DEQ permit or approval submittal application to the DEQ.

WHERE TO GET HELP: For questions about the LUCS process, contact the DEQ staff responsible for processing the permit/approval. Headquarters and regional staff may be reached using DEQ's toll-free telephone number 1-800-452-4011. For general questions, please contact DEQ land use staff listed at: www.deq.state.or.us/pubs/permithandbook/lucs.htm.

CULTURAL RESOURCES PROTECTION LAWS: Applicants involved in ground-disturbing activities should be aware of federal and state cultural resources protection laws. ORS 358.920 prohibits the excavation, injury, destruction, or alteration of an archeological site or object, or removal of archeological objects from public and private lands without an archeological permit issued by the State Historic Preservation Office. 16 USC 470, Section 106, National Historic Preservation Act of 1966 requires a federal agency, prior to any undertaking, to take into account the effect of the undertaking that is included on or eligible for inclusion in the National Register. For further information, contact the State Historic Preservation Office at 503-378-4168, extension 232.

SECTION 1 - TO BE COMPLETED BY APPLICANT

A. Applicant Name: <u>Gresham Sanitary Service</u>	B. Project Name: <u>Gresham Sanitary Service</u>
Contact Name: <u>Larry Ford, Controller</u>	Physical Address: <u>2131 NW Birdside</u>
Mailing Address: <u>2131 NW Birdside</u>	City, State, Zip: <u>Gresham, OR 97030</u>
City, State, Zip: <u>Gresham, Oregon 97030</u>	Tax Lot No.: <u>1700</u>
Telephone: <u>503 665-2424</u>	Township: <u>1S</u> Range: <u>3E</u> Section: <u>0540</u>
Tax Account No.: _____	Latitude: <u>45.5123</u>
	Longitude: <u>-122.455</u>

For latitude/longitude, use the DEQ Location Finder at <http://deq12.deq.state.or.us/website/findloc>.

C. Describe the type of business or facility and services or products provided:

waste transfer/reload



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

10/17/2018

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Rose City Associates LLC 10011 SE Division St Suite 300 Portland OR 97266	CONTACT NAME: Kate Lackner PHONE (A/C, No, Ext): (503) 762-3470 FAX (A/C, No): (503) 760-4239 E-MAIL ADDRESS: kate@rosecityassociates.com
INSURED Gresham Sanitary Service Inc., M.A.E.M.E. Rental Inc, and GSS Transfer, LLC PO Box 1560 Gresham OR 97030	INSURER(S) AFFORDING COVERAGE INSURER A: West American Insurance Co INSURER B: Ohio Security Insurance Co INSURER C: Ohio Casualty Insurance Co INSURER D: Westchester Fire Ins Co. INSURER E: INSURER F:

COVERAGES

CERTIFICATE NUMBER: CL1862105671

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:	Y		BKW58670716	07/01/2018	07/01/2019	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000 MED EXP (Any one person) \$ 15,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 2,000,000
B	<input checked="" type="checkbox"/> AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY			BAS58670716	07/01/2018	07/01/2019	COMBINED SINGLE LIMIT (Ea accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
C	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> EXCESS LIAB DED: <input checked="" type="checkbox"/> RETENTION \$ 10,000 <input type="checkbox"/> CLAIMS-MADE			USO58670716	07/01/2018	07/01/2019	EACH OCCURRENCE \$ 4,000,000 AGGREGATE \$ 4,000,000 PER STATUTE <input type="checkbox"/> OTH-ER <input type="checkbox"/>
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input type="checkbox"/>	N/A				E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
D	Pollution Liability			G28166138002	09/23/2018	09/23/2019	Pollution Liability \$2,000,000 Transportation Pollution \$1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Commercial General Liability Extension CG 88 10 04 13; Business Auto Coverage Enhancement Endorsement CA 88 01 10.

METRO, its elected officials, departments, employees and agents are included as additional insureds as respects to liability arising out of ongoing operations performed for this additional insured.

CERTIFICATE HOLDER

CANCELLATION

Metro 600 NE Grand Ave Portland OR 97232	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS. AUTHORIZED REPRESENTATIVE
---	---

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Oregon

John A. Kitzhaber, MD, Governor

Department of Environmental Quality

Northwest Region Portland Office

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

(503) 229-5263

Fax: (503) 229-6945

TTY: (800) 736-2900

May 18, 2011

Mr. Larry Head
2131 NW Birdsdales Avenue
Gresham, Oregon 97030

Re: Underground Injection Control (UIC) registration for drywells at the Gresham Sanitary Service, 2131 NW Birdsdales Avenue, in Gresham, UIC #13410.

Dear Mr. Head:

Thank you for submitting registration information for the UIC systems (drywells) at your facility on NW Birdsdales Avenue in Gresham.

The following table shows your UIC identification number, combined with the injection system information you submitted. Generally, each facility is issued one UIC number; the various injection systems for that facility are then identified sequentially -1, -2, -3, etc. Please reference this number in future correspondence, and retain this letter, or a copy of it, on site, should your UIC systems be inspected.

<i>UIC #</i>	<i>Type Code</i>	<i>Status</i>	<i>Location</i>
13410-1	5D2	Existing drywell w/CB insert	N.-central part of site
13410-2	5D2	Existing drywell w/CB insert	Near SW corner of transfer station
13410-3	5D2	Existing drywell w/CB insert	Near W. edge of site
13410-4	5D2	Existing drywell w/CB insert	Near SE corner of site
13410-5	5D2	Existing drywell w/CB insert	Near SE corner of site

Please note that you are required to do the following:

- Update registration information whenever a change of ownership, change of land use, modification, abandonment or closure of your injection systems takes place. If ownership for your UIC systems changes, notify the next owner and DEQ about the registered injection systems.
- Maintain and operate the injection systems to protect groundwater resources. This includes following the maintenance schedule and providing employee education. Failure to do so could jeopardize authorization by rule status.
- In accordance with OAR 340-044-0018(3)(d)(B)(iii), your site is required to conduct stormwater sampling twice within the first year of implementing the monitoring plan, and annual sampling each year thereafter.
- This authorization is for storm water only. It does not include runoff or leakage from a dumpster, waste or material storage areas or from construction activities, wash water, process water, fueling areas or waste water discharges.

Mr. Larry Head
May 18, 2011
page 2

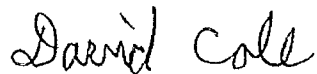
- Authorization by rule status will be revoked and a permit required if this site is found to be inside the delineated 2-year time of travel for a municipal well.

In the event a substance is spilled which may contaminate groundwater, contact the DEQ Northwest Region office (503-229-5263), and call Oregon Emergency Management at (503) 378-6377 or (800) 452-0311.

Based on the information you have sent to DEQ, your injection systems are authorized by rule under OAR 340-44. Please check with your local government to see if they have additional requirements.

If you have any questions about this letter, please contact me at (503) 229-6371, or toll free inside Oregon at 1-800-452-4011.

Sincerely,

A handwritten signature in cursive script that reads "David Cole".

David Cole, UIC Hydrogeologist
Water Quality Division

Cc: Rodney Weick, UIC Manager, DEQ - NWR
Lynne Kennedy, City of Gresham
Michael Poissant, JMP Engineering

OPERATING PLAN

GSS Transfer, LLC.

A partner company of Gresham Sanitary Service, Inc.



2131 NW Birdsdale Ave.

Gresham OR. 97030

Revised August 30, 2017

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GSS TRANSFER LLC. OPERATIONS PLAN

SECTION I -INTRODUCTION

GSS Transfer, LLC. is a partner company of Gresham Sanitary Service Inc. (GSS), who has operated a Transfer Station located at 2131 NW Birdsedale Avenue, Gresham, OR, since 1992. GSS Transfer and Gresham Sanitary Service, Inc. share common ownership. GSS has provided solid waste and recycling services since 1948 and is a locally owned and operated company.

GSS currently operates a solid waste Transfer Station under DEQ permit number 1392. The Transfer Station includes structures, equipment and operating personnel designated and trained to operate the facility. GSS Transfer's management team operates the facility to achieve maximum waste flow throughput efficiently and safely. Management focus will be placed on the following areas:

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

The Operations Plan serves a critical function in integrating structures, equipment, and the work force. The plan will be reviewed annually and updated as necessary.

A. PURPOSE OF THE OPERATIONS PLAN

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

1. Establish the practices and guidelines for the operation, use and maintenance of the facility in accordance with requirements of the Oregon Department of Environment Quality and METRO.
2. Acquaint operations and maintenance personnel with the facility's overall operations.
3. Describe individual job responsibilities for the operations and maintenance personnel.
4. 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 transferring 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 Solid Waste transfer.

SECTION II describes general facility operating requirements and procedures, for functions not directly related to Solid Waste transfer.

SECTION III contains a detailed description of each facility component related to Solid Waste transfer. Specific operation and control features are also described.

SECTION IV deals with equipment, facility maintenance, and inspections.

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, inclement 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 GSS Transfer's Management,

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

A.2 OVERVIEW OF FACILITY FUNCTION

GSS Transfer, LLC. is a registered company in the State of Oregon. GSS Transfer includes the transfer building, scale house, office, equipment, paving, and landscaping. GSS Transfer, LLC is authorized by the Oregon Department of Environmental Quality (DEQ) to accept residential, commercial, and industrial solid waste. No other wastes are accepted without written approval of Metro and/or DEQ. GSS Transfer 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 GSS Transfer facility is to receive and load Solid Waste into trailers for transfer to METRO and DEQ approved Transfer Stations or Landfills.

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, GSS Transfer shall contract such removal at the expense of the generator and/or hauler.

Public drop off is offered for Oregon E-Cycles materials and source separated cardboard and scrap metal. Public Solid Waste is not accepted. Our Shred NW division accepts documents and media for destruction in a shred plant, Medical Waste tubs and sharps containers are accepted on a drop off basis under Gresham Sanitary's Medical Waste operations. No other materials are accepted from the public. The Attachment A Site Plan details the drop off area location and overall layout of the facility.

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 located on 3.38 acres at 2131 NW Birdsdale Avenue, Gresham, OR, 97030.

The property is zoned as Heavy Industrial. Neighboring businesses directly adjacent to the site are: Moving & Storage, RV storage and Tri-Met light rail maintenance yard. The site is flat with no creeks, ditches or surface water flowing offsite.

The site has seven structures on it, a 48' by 70' Transfer building covering the tipping floor and loading bays, two office buildings, service shop building, fuel island, storage/shred building, truck wash, paved and landscaped areas. The site also contains a CNG fueling system. See Attachment A for details.

The general flow of Solid Waste truck traffic onto the site is directed to the southeast scale entrance gate. Public drop off, for the limited materials detailed in section A2, is just inside the northeast gate.

The site is secured by a six (6) foot fence around the site and gates restrict access during non-business hours.

Access to the site is via the northeast and southeast corner of the property from Birdsdale Avenue. All access roads are paved to deter mud, dust and traffic hazards while providing reasonable all-weather access. The facility is fenced and posted with "No Trespassing" signs.

Signage detailing unacceptable materials is posted at transfer facility entry points. The signs provide the following information:

- a. Name of Facility;
- b. Emergency phone number;
- c. Days and hours of operation;
- d. Authorized and prohibited waste;
- e. DEQ solid waste facility permit number;
- f. Facility address

B. ACCESS AND CIRCULATION/TRAFFIC CONTROLS

For Solid Waste traffic, the southeast facility entry gate provides two lanes; one across the truck scale and one bypass lane, for emergency equipment access. All traffic will exit via the north gate.

C. PARKING

Employee parking is provided south of the service shop building. Visitor parking is provided north of the office building with direct access from Birdsdale Avenue. This parking lot includes handicap parking.

D. STORM AND SANITARY DISPOSAL

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

1. SANITARY SEWER WATER

Sanitary sewer water which includes drainage from toilets and washbasins is discharged to the City of Gresham sanitary sewer system.

2. STORMWATER

Storm Drains from on-site pavement and roof areas. Surface water and ground water is protected by the use of separate drainage systems and the use of oil water separators. Stormwater runoff is controlled through a series of catch basins with filter liners and oil/water separators before it discharges into the Underground Injection System (UIC). After passing through the UIC system, the stormwater flows into the natural on-site drainage way. Facility grading prevents any surface stormwater from flowing off-site. This system has been approved by DEQ under Permit #13410 and all annual testing requirements have been met. The catch basins and oil/water separator are inspected and maintained on a routine basis.

3. WASTEWATER

Wastewater or solid waste leachate. The wastewater or solid waste leachate from the tipping floor and load out pit is first directed through an oil/water separator. It then flows to a weir system to remove any solids and sediment. The remaining liquid is collected and pumped into a holding tank. The contents of the wastewater holding tank are either collected by a licensed liquid waste processing company or sprayed on the solid waste hauled to landfill. The dry portions of the solid waste absorb the liquid.

The tipping floor and load out pit wastewater system is fully separated from stormwater. All equipment cleaning and wash-down is performed in our covered truck wash building. Wastewater from the truck wash building is directed through a weir system to remove solids and then into a coalescent vault that utilizes corrugated polypropylene plates and specific gravity by-pass chambers to separate any oil or grease. The output is directed into the sanitary sewer. The contents of the oil separation chamber are collected by a licensed liquid waste processing company. The truck wash is covered and the wastewater system is fully separated from stormwater

All Solid Waste is managed in the transfer building or stored in containers to prevent solid waste from coming in contact with stormwater.

Best Management Practices (BMPs) are in place to reduce pollutants. Our BMPs include frequent sweeping of impervious surfaces with our sweeper truck, spill prevention, and spill cleanup training, frequent storm drain monitoring to determine cleaning requirements and frequent pickup of litter or trash.

E. NUISANCE CONTROL

GSS Transfer 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. Occurrences of pests are

noted in the inspection log to aid in monitoring and control.

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

F. NOISE CONTROL

Noise is controlled through the proper use and maintenance of mufflers on trucks and equipment. Variable volume and noise reduction back-up alarms are used on all equipment and are monitored to ensure compliance with DOT, safety and noise requirements. Noise in the transfer area is controlled by the Transfer Station walls. Our last six replacement route trucks, as well as most future replacements, are powered by CNG engines. The CNG engines are much quieter than diesel and result in significant noise reductions during operations.

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 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. GSS Transfer operates its own sweeper truck to accommodate timely cleanup of litter. Loads are required to be covered. Uncovered loads will not be accepted. Wind is a big factor in East Multnomah County and every effort is made to control litter.

H. HOURS OF OPERATION

The facility is open to the public, for drop of the limited materials detailed in section A2, from 8:30 a.m. to 4 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 his/her designee 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

GSS Transfer 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.

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 IV. 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. Putrescible ("wet") Solid Waste.
2. Source separated materials such as glass, yard debris, scrap metal, and bulky waste from GSS route operations are consolidated in drop boxes for direct hauling to markets.

B.1 ACCEPTABLE WASTE

The Transfer Station currently accepts wet solid waste from Commercial Haulers only. No special waste or public waste is accepted. Since no material recovery occurs on site, loads containing only dry waste or construction waste are not accepted.

"Solid Waste" means all useless or discarded putrescible and non-putrescible materials, including, but not limited to, garbage, rubbish, refuse, ashes, paper and cardboard, useless or discarded commercial and industrial materials, discarded or abandoned vehicles parts, manure, vegetable or animal solid and semisolid materials, and dead animals.

B.2 UNACCEPTABLE WASTE

Unacceptable waste means:

1. Hazardous waste as defined in ORS 466.005;
2. Radioactive waste as defined in ORS 469.300;
3. Chemicals, liquids, batteries explosives, infectious materials, and other materials which may be hazardous or difficult to manage;
4. Bulky combustible material, vehicles, tires, sewage sludge's, septic tank pumpings, large home or industrial appliances, large dead animals;
5. Mixed solid waste from public self-haul;
6. Source separated recyclable materials, other than listed drop off materials;
7. Materials contaminated with or containing greater than one percent friable or non-friable asbestos;
8. Oil other than collected in source separated residential curbside programs;
9. Electronic waste disposal;

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 one scale and a scale house. Normal operation calls for the scale house to be open during all hours that material is being accepted. Inbound solid waste trucks are identified by a truck number. These truck 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 truck number is again keyed into the system and a tare weight is computed.

The computer automatically calculates the net weight by subtracting the tare weight from the gross weight. A weight ticket is then printed with the weight information, date and time of day. If, for some reason a truck 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 net weight for the transaction..

If the scales are bypassed, the driver 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.

C.2 SCALE HOUSE

The Scale House area consists of a scale computer terminal and ticket printer. This system stores all pertinent truck data and uses the data to calculate net weight and to print weight tickets.

C.3 ROUTE TRUCKS

After weighing in, route trucks will be directed to the transfer building for unloading. 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 of accepted source separated materials, as detailed in Section 1 (A.2), will be directed, by the GSS office staff, to a specific off-loading area just inside the north gate. No public self-haul solid waste is accepted. At the drop-off area, signage will direct incoming vehicles to appropriate locations depending on the nature of the materials. Vehicles which have deposited their materials will be directed to exit the facility. Scavenging is not permitted at the GSS Transfer facility.

C.5 LOAD CHECKING

GSS Transfer personnel screen all incoming waste materials, where possible in open drop boxes, prior to tipping. For compactor route trucks or drop box compactors, advance load screening isn't possible. For these loads, the contents are observed during or soon after tipping to detect any unacceptable waste that may have been tipped onto the transfer floor. Transfer management will be notified of any unacceptable wastes and management will coordinate safe containment, storage and disposal.

Unacceptable wastes are segregated for proper characterization and management. A log of such materials will be filled out for each incident. (See Appendix D for additional details.)

Any liquids or other unacceptable wastes are to be removed from the load prior to dumping if possible, and returned to the generator if it is possible to identify the source of the material.

Management will attempt to identify the source of the unacceptable materials and the generator will be called to remove them. If the owner of the unacceptable waste cannot be identified, GSS Transfer will be responsible for proper disposal of the waste, at its own expense.

Any materials suspected to contain friable or non-friable asbestos (ACM) will be thoroughly evaluated by GSS Transfer personnel. If suspect ACM is observed in waste on the floor, the equipment operator will immediately contact a supervisor after clearing people away from the area. The suspect ACM will be handled as detailed in appendix E.

Infectious wastes, other than source separated infectious material stored in our medical waste collection truck or temporarily staged in a locked secure storage area, are not accepted.

Explosives, including small arms ammunition are not accepted under any circumstances. Potentially hazardous wastes must be removed from the site within seven (7) days.

Generators are notified to not place hazardous or other prohibited waste in drop boxes or other collection containers by City of Gresham, Portland educational newsletters, and detailed messaging on every GSS billing statement.

If the incoming load was generated outside the Metro district, GSS Transfer personnel will confirm the source of the load with the driver. Outside Metro district loads will only be accepted from pre-authorized haulers.

C.6 FACILITY PROCESS FLOW

Attachment A illustrates the general flow of vehicles through the GSS Transfer property.

D. FACILITY TRANSFER OPERATIONS

Trucks entering the facility are directed to the Transfer Building after scaling in. The Transfer Building is 48' by 70' and is enclosed on three sides with a roof covering the tipping floor and trailer loading pits. The Transfer Station design uses an elevated tipping floor and trailer loading pits for top loading transfer trailers. Trucks first offload solid waste onto the tipping floor. A front end loader then pushes the solid waste into the transfer trailer via a loading ramp that extends out over the trailer. Finally, the solid waste in the transfer trailer is distributed and leveled using a Track Hoe.

D.1 USED OIL STORAGE

GSS Transfer has a 250 gallon used oil storage tank located under a roof and with secondary spill containment underneath. GSS Recycle trucks 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 GSS Transfer employees.

E. TRANSFER TRAILER PROCEDURES

Material is loaded into trailers for transportation to METRO and DEQ approved Transfer Stations or Landfills. Material will be shipped on a first loaded, first disposed basis to minimize storage time. Full trailers of outbound Solid Waste may be stored, for short periods of time, in a designated area located in the south west corner of the facility. Trailers are weighed on our scale after being loaded to ensure weight limit compliance. All transport vehicles and trailers are designed, maintained, and operated to prevent any leakage or spillage of materials or wastes while in transit.

E.1 MATERIAL HAULING AND TRUCKING

GSS Transfer utilizes its own rolling stock and subcontractors for hauling of source separated materials and Putrescible Solid Waste. A tractor is used to spot trailers.

E.2 TRAILER/SHIPPING CONTAINER PROCESSING

All trailers will be weighed entering and leaving the facility, to establish the net weight shipped. In the event a truck is overweight, GSS Transfer personnel 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 GSS Transfer facility will not knowingly handle waste types that are prohibited by federal, state or local regulations and policies. These wastes include:

1. Hazardous waste as defined in ORS 466.005;
2. Radioactive waste as defined in ORS 469.300;
3. Chemicals, liquids, Batteries explosives, infectious materials, and other materials which may be hazardous or difficult to manage;
4. Bulky combustible material, vehicles, tires, sewage sludge's, septic tank pumpings, large home or industrial appliances, and large dead animals;
5. Mixed solid waste from public self-haul;
6. Source Separated Recyclable Materials, other than listed drop off materials;
7. Materials contaminated with or containing greater than one percent Friable or Non-Friable Asbestos;
8. Oil other than collected in source separated residential curbside programs;
9. Electronic waste disposal.

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. Route drivers will usually inspect the visible portion of each cart or container for unacceptable waste during the dumping process. The Transfer Facility 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.

Control procedures inside the facility are as follows:

1. Material is visually inspected as it is being tipped. The inspection is done by GSS Transfer spotters or operators. Communication devices are provided to allow contact between the spotter/equipment operator, lead person or site supervisor 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 GSS Transfer, or others, reveals that any material which is delivered to the facility is unacceptable waste, GSS Transfer will, if possible, contact the generator to have it removed. If the generator refuses to remove the material, cannot safely remove the material, or cannot be identified, 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, GSS Transfer personnel will:
 - a. Contain and isolate the detected material;
 - b. If appropriate, notify the Facility 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 GSS Transfer's judgment, is incapable of complying with the requirements for unacceptable waste cleanup, GSS Transfer will arrange the unacceptable waste cleanup;
 - g. Fully document all costs for managing suspicious, hazardous and unacceptable wastes.

SECTION IV -EQUIPMENT AND FACILITY MAINTENANCE

A. GENERAL

To a great extent, a well operated Transfer Station 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 and maintained for the best results. In addition, most manuals describe standard repair procedures. 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 operations change.

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 a front end loader, track hoe, transfer trucks and trailers, truck scales, rolling stock, CNG fueling station, diesel fuel island, 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 GSS Transfer maintenance personnel with assistance, as required, from off-site contractors.

GSS Transfer 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 FACILITY INSPECTIONS

The Facility Manager or his/her designee conducts a daily site inspection, which covers all aspects of facility operations. If deficiencies are noted, corrective action is taken. Deficiencies which cannot be corrected within twenty-four (24) hours, or which have an impact on regulatory compliance, are documented, and monitored through an internal tracking system to ensure timely resolution.

In addition to daily site inspections, documented inspections by the Facility Manager or his/her designee occur at a minimum of once per month on days not specified in advance. An Inspection Report is used to assure all aspects of the facility are inspected. The date and time of the inspection, the inspector's printed and written name, all observations, and the date and nature of all corrective actions are included on the inspection log. The completed monthly inspection forms constitute the Inspection Log. They are kept in a binder at the facility for at least three (3) years. Environmental, safety or compliance issues noted on self-inspections are corrected as soon as is feasible, and the date and time of repair is noted.

B.4 MAINTENANCE SCHEDULES

All equipment is inspected daily and is documented on equipment inspection forms. 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 Shop Manager's approval.

GSS Transfer submits oil samples from each piece of equipment on a regular schedule, and on 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 and are maintained as required.

SCALES -The scales receive an annual inspection and certification by and inspector from the Oregon Department of Agriculture. A certificate of inspection and license are maintained in the scale house and in the office.

SECTION V -STAFFING: PERSONNEL, DUTIES AND WORK SCHEDULE

This section describes the GSS Transfer facility's personnel organization structure. Topics include:

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

A. GENERAL ORGANIZATION

GSS Transfer, and its parent company Gresham Sanitary Service, maintains a centralized management and administrative staff to handle the common needs of all of its facilities.

B. WORK SCHEDULES

Table 1 shows the GSS Transfer 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 lead person. Facility hours and employee shift schedules are subject to change based on customer and production requirements.

Table 1 GSS Transfer Facility Staffing

Management Positions	Staff Positions
Facility Manager	Lead person
Shop Manager	Equipment Operator/Spotter
	Equipment Maintenance
	Office Admin

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 Operator/Spotter
3. Office Admin
4. 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 Lead person.

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. Ensuring that proper operational practices are maintained and the site is operating in conformance with the engineering plans and applicable regulating requirements.
5. 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.
6. Provide training of Equipment Operators.
7. Implement and supervise safety policy; ensure that all necessary safety precautions are observed; coordinate safety meetings for employee groups
8. Receive and investigate any complaints and recommend remedial action as appropriate.
 - Lead tours of site for pre-arranged individuals or groups.
 - Ensure adequate site security.
 - Maintain health and safety and environmental compliance overall.

C.2 LEAD PERSON

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

C.3 EQUIPMENT OPERATORS/SPOTTERS

The Equipment Operator/Spotter is a combined position. When loads arrive at the facility they direct arriving vehicles into appropriate areas for scaling or unloading. They ensure the safe and efficient flow of private and commercial vehicles into and out of unloading areas.

The Equipment Operator/Spotter is responsible for visually inspecting solid waste 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.

Once the Equipment operator/Spotter has inspected the load, they will load the solid waste into transfer trailers. 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 Facility Manager. Equipment Operators run the front-end loaders, forklifts, track hoe, drop box trucks, sweeper, yard goat tractor, and other equipment that may be on site.

The responsibilities of the Equipment 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. Visually inspecting solid waste as it is being unloaded in the facility to identify any suspicious or unacceptable materials;
5. Clean up and grounds maintenance of the facilities;
6. Litter patrol;
7. Perform any other assigned duties designated by the Lead person or the Site Supervisor.

C.4 OFFICE ADMINISTRATOR

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

1. Posting of inbound and outbound scale tickets;
2. Prepare monthly, quarterly and annual reports as required;
3. Work with Company accounting personnel to prepare reports;
4. Perform reception and telephone operator functions;
5. Perform special studies as directed;
6. Procure necessary supplies and equipment for field and office functions;
7. Coordinate record keeping and data management of scale transaction records,
8. Perform other tasks that may be assigned.

C.5 SHOP MANAGER

This position has the lead responsibility for all maintenance of the GSS Transfer 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. Review routine preventive maintenance on all equipment;
4. Schedule and implement facility maintenance;
5. In the absence of the Facility Manager, function as the Site Supervisor.

C.6 EQUIPMENT MAINTENANCE PERSONNEL

Equipment Maintenance Personnel are responsible for maintaining the effective operation of all equipment. They are appropriately trained on the procedures, controls, and functions of the equipment used at the facility. They will diagnose and perform repairs on the facility and equipment as required. They will also be trained to perform the duties of the Equipment Operator/Spotter as required.

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 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
12402 SE Jennifer St, Clackamas, OR 97015
1-888-ER KLEEN

2. Spill Response Contractor-Hazardous Materials Spills

Safety Kleen
12402 SE Jennifer St, Clackamas, OR 97015
1-888-ER KLEEN

3. Spill Response Contractor-Oil Spills

Clean Harbors, Inc.
12402 SE Jennifer St, Clackamas, OR 97015
1-888-ER KLEEN

4. Pest Control Contractor

Interstate Pest Control, Inc.
211 SE Madison St, Suite 10 Portland OR, 97214
(503) 563-7321

5. Used Oil Contractor

American Petroleum Environmental Services
11535 N Force Ave. Portland, OR 97217
(503) 455-7780

6. Workplace Safety/Environmental Consultant

The Risk Management Group
11610 SW 116th Ave. Portland OR 97223
(503)709-7129

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 route trucks bringing materials to the facility, facility functions must continue as normal as possible under these circumstances.

B. INCLEMENT WEATHER

In the Portland area, potential types of inclement 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 loader or track hoe 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 until temporary rental equipment is obtained.

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

D. SITE ACCESS BLOCKAGE

If arterial access to the facility is denied because of an emergency, GSS Transfer will consult with the City of Gresham, Metro, DEQ and/or Multnomah County regarding an alternative transportation plan. If the blockage appears to be lengthy, trucks 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.

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.1 FACILITY INFORMATION

Name of Facility: GSS Transfer, LLC.

Type of Facility: Solid Waste Transfer Station

Mailing Address: PO Box 1560
Gresham, OR 97030

Site Address: 2131 NW Birdsedale Avenue,
Gresham, OR 97030

Name of contact person: Matt Miller

Phone number: (503) 665-2424

Fax number: (503) 666-0917

E-mail address: matt@gss-nw.com

Name and address of company owner or parent company:
Michael & Deborah Miller, Gresham Sanitary Service, Inc.
PO BOX 1560
Gresham, OR 97030

Phone number: (503) 665-2424

Fax number: (503) 666-0917

E-mail address: mike@gss-nw.com

A.2 APPLICABLE APPENDICES

A. Statement of Authorization for GSS Transfer Emergency Coordinators and Alternates

Name	Title	Address & Phone No.
Matt Miller	Facility Manager/ Environmental, Safety & Health (ES&H) Manager	PO Box 1560, Gresham, OR 97030. 503-209-3932
Tod Ronson	Operations Manager	PO Box 1560, Gresham, OR 97030. 503-209-0845
Tim Kasch	Shop Manager	PO Box 1560, Gresham, OR 97030. 503-209-6792
Larry Head	Controller	PO Box 1560, Gresham, OR 97030. 503-519-3346

A.3 EMERGENCY CALL LIST

<u>Emergency type</u>	<u>Service provider</u>	<u>Phone Number</u>
Injury	Legacy Mount Hood Medical Center	(503) 674-1122
Fire	Gresham Fire Department	911
Public & Life Safety	Gresham Fire Department	911
Clean-up	Clean Harbors, Inc.	(888) 375-5336
Spill Reporting	Oregon Emergency Response System	(800) 452-0311

B. PREPAREDNESS AND PREVENTION**B.1 DESIGN AND OPERATION**

The GSS Transfer facility has been designed and constructed in a manner that minimizes the potential for environmental exposures, fires, and explosions. Its features include concrete and 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. GSS Transfer 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 GSS Transfer 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 facility & 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 Section D. 9-11. The ES&H Manager/Alternate Emergency Coordinator will insure that fires, explosions and releases do not occur, recur, or spread;
 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 Section D. 9-11;
 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 facility 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 gates are kept closed when the facility is not receiving waste. Supervisors, maintenance personnel, and lead persons have keys to open all facility gates.

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

GSS Transfer 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. Landline Telephones;
2. Cellular Telephones;
3. Monitored alarm and fire system.

Cellular telephones are carried by most GSS Transfer operations staff. GSS Transfer administrative staff are also in telephone contact with facility personnel.

C.3 FIRE CONTROL EQUIPMENT

The fire control equipment at the facility includes portable fire extinguishers, fire hydrants, and fire hoses. The locations of the fire hoses and the fire extinguishers are shown in Attachment A. There is a fire hydrant at the East 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 (APW), ABC Dry Chemical (powder), Foam, Halon, or Purple K (Wet Chemical)
B	Flammable Liquids	Use ABC, BC, Halon or Purple K (Wet Chemical)
C	Electrical Fire	Use ABC or 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, booms and UIC grate blocks are kept at various locations in the facility, in large plastic cans or spill kits, 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 residential, commercial and industrial 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.

GSS Transfer 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 shop office 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 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 Section D.9 to D.11 and appendix E.

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 cell phone 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, DEQ or EPA, as appropriate

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 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 lead person or 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. Addendum 2 is a Hazardous Waste Assessment Guide 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 facility and corporate personnel as needed from the Authorized Emergency Coordinators List shown in Section VII, A.2;
2. Contact the external authorities from the Emergency Call List shown in Section VII, A.3 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 spills 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 implement the Major Emergency Procedures detailed in Table 6.

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 GSS Transfer 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.

GSS Transfer will use good faith efforts to identify persons who dump identified hazardous wastes. The "Equipment Operators/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 GSS Transfer 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. 9-11. 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. Check stock items in first aid and spill kits and replenish as needed.
3. 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 GSS Transfer 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 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 corporate Office and are stored in individual employee files. As an employee receives work related training, documentation of the training is placed in the individuals file. Training records are archived at the corporate office when an employee leaves GSS Transfer employment. Training records are retained, at a minimum, for as long as specified by the individual training requirements.

B.3 WASTE DISPOSAL RECORDS/REPORTS

Incoming Materials;

Drivers of vehicles entering the facility weigh the truck on our certified scale and fill out a scale ticket. The following information is listed on the incoming ticket:

1. Date and time;
2. Hauling Company, driver and truck number;
3. Type of material; Solid Waste or Yard Debris;
4. Source of load;
5. Area material collected. Inside or outside Metro District;
6. Gross, net and tare weight.

The inbound load transaction data will be entered into our billing and reporting system on a daily basis.

Outbound Materials:

Drivers of transfer trucks leaving the facility weigh the route truck and trailer on our certified scale and fill out a scale ticket. The following information is listed on the outbound ticket:

1. Date and time;
2. Hauling Company, driver and truck number;
3. Type of material; Solid Waste or Yard Debris;
4. Destination facility name;
5. Gross, net and tare weight.

The outbound load transaction data will also be entered into our billing and reporting system on a daily basis.

Reports will be submitted to DEQ or METRO as required by permit, regulatory requirements, franchise obligations and business objectives. The information recorded on incoming and outgoing loads is sufficient to generate the information needed to meet all reporting obligations as follows:

- List of incoming loads by material type, category and area;
- List of outgoing loads by material type, area and destination;
- Tonnage totals for incoming loads by material type, category and area;
- Tonnage totals for outgoing loads by material type, area and destination.

Monthly waste reporting is compiled by the corporate accounting department. GSS Transfer 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 GSS Transfer is kept at the Corporate Office. 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 Facility Manager 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 GSS Transfer Health and Safety Manual.

B.6 MONITORING AND REPORTING REQUIREMENTS

GSS Transfer is required to submit monitoring reports to Oregon DEQ and other agencies on a scheduled basis. GSS Transfer's annual Stormwater testing 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 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 GSS Transfer'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 GSS Transfer safety program includes:

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

In addition, GSS Transfer 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 (clothing must not be frayed or torn); and high top, steel toed work boots with nonskid soles. Gloves, safety glasses, hearing protection, safety vests (equipment operators/spotters only), and hard hats will be provided by GSS Transfer. Hearing protection is required in designated areas, and eye protection is required at all times in the Transfer building. Office employees are exempt from this requirement except when entering the loading areas. The above items are supplied by GSS Transfer and are mandatory wearing apparel. If an employee wears prescription eyeglasses, they must be of the safety-lens type. First aid kits are located in the Service building and are maintained as appropriate. Eyewash stations are located in the Service Building and Truck Wash.

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 GSS Transfer 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 spotters and loaders in proximity to the waste. Because potentially dangerous materials may be encountered in any waste handling system, GSS Transfer 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 and gloves. The facility will comply with all applicable federal OSHA requirements for work place health and safety standards and will be inspected by GSS Transfer safety officers for compliance. Emergency eyewash facilities 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 were posted at the entrance gate, or similar location, of the Transfer Station alerting all customers of the disposal ban. The sign(s) 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 were posted directing customers to the nearest e-waste drop off location for recycle or reuse. Signage indicates the location of the on-site facility for e-waste acceptance.

A.2 INSPECTION OF INCOMING LOADS

The designated employee (Lead Person) will:

1. Ask the driver 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 the 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 on-site 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 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 in a sealed 5gal bucket;
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 sealed bucket or plastic bag;
5. All loose glass will be removed from the broken CRT housing and the housing will be individually shrink wrapped;
6. 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;
7. 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 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.)
4. Handling incoming CEDs: Tell employees how to handle CEDs that are found for disposal by reading the "Management Practices" section. 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.

C. ACCEPTABLE E-WASTE

E-Waste is accepted on a drop off basis by our Gresham Sanitary Service division and is limited to computers, monitors, televisions, printers, keyboards and mice covered under the Oregon SCP E-Cycles program.

C. 1 UNACCEPTABLE WASTE

Items not covered under the Oregon SCP E-Cycles program are not accepted.

- CRTs with broken glass are not accepted.
- No recycling or processing is conducted on site.

C.2 E-WASTE RECEIVING

- All incoming Electronic Waste is screened by visual inspection. Only items covered under the Oregon SCP E-Cycles program are accepted.
- All loads containing prohibited wastes or unauthorized wastes will be rejected.

C.3 MATERIAL STORAGE AND PROCESSING

- All materials are stored under cover and are not exposed to stormwater, atmospheric conditions, floods, and unauthorized access.
- Personnel are trained in proper handling and protective measures to prevent inadvertent breakage

C.4 WASTE SORTING AND RECOVERY

No recycling or processing is conducted on site.

C.5 PROCEDURES FOR MEASURING QUANTITIES OF WASTE RECOVERED FOR MATERIAL RECOVERY SURVEYS AND/OR RECYCLING RATES

All loads shipped are recorded on a shipping log. The material weights provided by the Oregon E-Waste processors will be reported on our monthly recycling reports that are submitted to the City of Gresham. In addition the material weight will be reported on the annual DEQ Recycling Collector Survey.

C.6 DOWNSTREAM DUE DILIGENCE

Electronic waste will only be shipped to processors approved by the Oregon SCP E-Cycles program. The

Oregon SCP E-Cycles program processor guidelines ensure that waste receiving vendors will recycle, refurbish, reuse, or dispose materials in accordance with federal, state and local laws, transporting, shipping, and handling laws of recipient states and countries.

C.7 REPORTING REQUIREMENTS

The material weights provided by the Oregon SCP E-Cycles processors will be reported on our monthly recycling reports that are submitted to the City of Gresham and DEQ through the ReTrac reporting system.

C.8 SPECIAL WASTE MANAGEMENT PLAN

Our E-Waste special waste management plan is detailed in Section X (B)

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
- G. Closure Protocols
- H. Complaint Logging

A. LITTER CONTROL FOR WASTE-RELATED USES

A litter control program is maintained daily for all areas within the GSS Transfer 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 on Birdsdale Avenue is monitored daily and litter is picked up as incidences occur. Upon observation or notification of illegally dumped waste products near the site, the litter patrol immediately cleans up the identified area.

A warning is issued to all drivers coming into the GSS Transfer site that are not tied down or covered in order to minimize littering from the vehicle. The warning informs the driver that loads that are not tied down or covered will not be accepted.

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 regulatory requirements for waste-related vehicles.

B. DUST, MUD, VECTOR CONTROL

The dust and mud control is maintained by our company owned sweeper truck or a subcontractor. The sweeper truck has regular service days that cover all areas of the site. Since the travel areas are all asphalt, there is a minimal amount of problems that occur on site.

The facility is designed and operated to minimize dust. All access roads are paved to reduce dust. The facility design also minimizes dust generation by using a tipping floor rather than a pit design. Because materials fall only a short distance, dust generation is significantly reduced. Any loads containing excessive dust will be wet down to reduce dust emissions. Route drivers report to management any issues with dust or uncontained fines at the point of collection. Management will then contact the generator to discuss containment requirements.

Pest control is maintained by an outside firm which conducts regular service to the site on a Monthly 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.

C. ODOR CONTROL PLAN

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

1. The tipping floor is swept and washed as needed to control odors. Odors are further minimized by managing materials inside of buildings and containers, and removing loaded materials from the site frequently. Drivers are asked to deliver loads as soon after collection as possible;
2. The Equipment Operator/Spotter screens incoming loads for odor problems. Loads which contain a significant amount of decomposing material and may soon emit objectionable odors are given loading priority so that they can be quickly placed in a trailer, covered and transferred from the facility;
3. Loads are not to be stockpiled;
4. To minimize the potential for odors or pests at the transfer station, putrescible materials will generally be removed from the site within twenty-four (24) hours of being tipped. To the extent practical, containers of malodorous materials will be shipped on a first loaded, first disposed basis;
5. Odor complaint triggers immediate identification and containment procedure. If GSS Transfer 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. The Facility Manager will also notify the generator of the odoriferous material, if possible, and review requirements for hauling future material more frequently to reduce odors;
6. Litter control minimizes odor. The Company maintains a daily 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 on Birdsdale Avenue. where trucks drive to access the site. Upon observation or notification of illegally dumped waste products near the site, the litter patrol immediately cleans up the identified area. All materials are put into the waste stream at GSS Transfer.

D. UNACCEPTABLE WASTE EXCLUSION PLAN

The Transfer is designed to receive Putrescible ("wet") Solid Waste. This plan establishes procedures for managing wastes that are not suitable for transfer at the facility.

1. Purpose

The purpose of the Unacceptable Waste Exclusion Plan is threefold:

- To prevent unacceptable waste from entering the solid waste stream;
- To detect unacceptable waste that has entered the facility, and;
- To safely manage unacceptable waste that has been removed from the solid waste 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. GSS Transfer has implemented the following methods to prevent unacceptable waste from entering the facility:

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

3. Detection

If unacceptable waste is discovered in the solid waste, 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 transfer equipment operator/spotter, and other GSS staff who have occasion to view the waste stream.

GSS Transfer & Third Party Drivers

Drivers are the first line of defense for detecting and removing unacceptable waste from the waste stream. Prior to transporting a customer's material, 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.

Equipment operator/Spotter

An equipment operator/spotter will observe tipping operations at the facility. The equipment operator/spotter must have specified safety equipment readily available. As solid waste is dumped onto the tipping floor, the operator/spotter 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 Facility Manager will designate and train staff members who will be assigned as equipment operators/spotters. 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 transfer 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 GSS Transfer's 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 Spill Response Contractor 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 Spill Response Contractor. 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 Spill Response Contractor. 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 transfer 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 transfers loads having the following characteristics:

- The load contains Putrescible ("wet") Solid Waste"; which means all useless or discarded putrescible and non-putrescible materials, including, but not limited to, garbage, rubbish, refuse, ashes, paper and cardboard, useless or discarded commercial and industrial materials, discarded or abandoned vehicles parts, manure, vegetable or animal solid and semisolid materials and dead animals;
- 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 only dry non-putrescible dry waste or 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;
- 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 "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 materials contaminated with or containing greater than one percent friable or non-friable asbestos;
- Hazardous waste as defined in ORS 466.005;
- Radioactive waste as defined in ORS 469.300;
- Chemicals, liquids, Batteries, explosives, infectious materials, and other materials which may be

hazardous or difficult to manage;

- Bulky combustible material, vehicles, tires, sewage sludge's, septic tank pumpings, large home or industrial appliances, large dead animals;
- Mixed solid waste from public self-haul;
- Source separated recyclable materials;
- Oil other than collected in source separated residential curbside programs;
- Electronic waste disposal.

E. SPECIAL WASTE MANAGEMENT PROCEDURES

GSS Transfer 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, if possible, returned to the driver after they have disposed of their load. The driver will not be allowed to proceed to the tipping floor until unacceptable materials have been isolated from the waste load.

Solid Waste Containing Friable or Non-friable Asbestos

Asbestos Training is conducted in compliance with DEQ standards (See Addendum 1).

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

- The equipment operator will immediately clear people away from the area and notify a supervisor;
- The suspected material will be isolated (i.e. not handled/moved), water will be applied, and plastic will be applied over the suspect material;
- Obtain a representative sample (s) of the suspected ACM material and send it to a certified lab for testing.

If the material tests positive for asbestos content of greater than one percent, a licensed abatement contractor will be contracted to prepare and dispose of the ACM in accordance with state and federal regulations.

Infectious wastes,(other than those collected by Gresham Sanitary's Medical Waste service), and explosives, including small arms ammunition are not accepted under any circumstances.

F. 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. Training on spill prevention is provided to all operational employees. To contain any possible spills associated with daily truck maintenance, employees are only allowed to add motor, transmission, hydraulic or coolant to trucks in our truck wash or inside the shop building. 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, UIC grate blocks, 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.

G. CLOSURE PROTOCOL

In the event of a short-term cessation of operations (7 days to 30 days), management will contact all impacted customers and advise them of the approximate time the closure will be in effect. The gates will be closed and a sign will be posted on the gates advising of Temporary Closure. All outbound material will be transported as soon as is feasible. DEQ and METRO will be advised of the nature of the problem, the proposed resolution and the approximate time of reopening.

In the event of a long-term or permanent cessation of operations, management will immediately contact and meet with DEQ and Metro as early as it is known that there is a plan to cease operations. As the result of meetings with DEQ Metro, the best course of action possible will be decided which serves our company, DEQ, Metro, and the customer base. If at all possible, efforts will be made to secure alternative options for the customers in order to not cause any significant disruption of their business.

Once a decision is made to cease operations, as much as practicable, receipt of materials from non-critical customers will stop immediately. All remaining materials will be shipped on an expedited basis. The site will be left clean and all bills will be paid in full.

Upon full closure of the facility, the following tasks will be performed: Waste materials, estimated at less than 30 tons, will be removed from the facility for transport to METRO and DEQ approved Transfer Stations or Landfills.

1. The tipping floor and trailer loading area will be thoroughly swept and cleaned.
2. Debris will be removed from site drains, sumps and catch basins.
3. Litter around the facility will be removed.
4. The fence and gate will be left intact and the access gate will be locked.
5. All regulatory agencies will be notified as required by applicable law, regulations and permits.

Closure costs for the procedures detailed above are estimated at less than \$10,000. Since the closure costs are less than \$10,000, GSS Transfer requests that the financial assurance requirements be waived.

H. COMPLAINT LOGGING

In the event of a complaint, the Facility Manager shall immediately log the complaint to include the date, name of complainant, description of the complaint, and the action taken to resolve the complaint.

ADDENDUM 1

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

A. Initial Training – Two Hour Version

GSS Transfer, LLC. A division of Gresham Sanitary Service, Inc.
2131 N.W. Birdsedale
P.O. Box 1560, Gresham, OR 97030
503.665.2424 • Fax.503.666.0917
www.greshamsanitary.com



Date _____

Re: Asbestos Awareness Training

On _____, **GSS Transfer** 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: _____

B. Annual Refresher Training – No time requirement specified

GSS Transfer, LLC. A division of Gresham Sanitary Service, Inc.
2131 N.W. Birdsdales
P.O. Box 1560, Gresham, OR 97030
503.665.2424 • Fax.503.666.0917
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Date _____

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

Name	Date of Birth

Signed by: _____

Name: _____

Title: _____

ADDENDUM 2

A. Hazardous Waste Assessment Guide

B. Specific Chemical Measures

A. HAZARDOUS WASTE ASSESMENT GUIDE

D.E.C.I.D.E - When responding to spills

Two rules apply when responding to spills or hazardous materials discovered in the solid waste load. Work safely and don't make the spill worse than it already is. What actions you take will depend on the first analysis of the situation. Take nothing for granted and be ready for the worst. Assume that whatever can happen, will. Most importantly, don't jump into emergency response activities in haste without the proper personal protective equipment.

The first step is to evaluate the risk and start notification procedures. Risk assessment is a natural function you do every time that you cross the street or drive to work.

You study the situation and try to predict the various possibilities that may occur until the spill is cleaned up or the hazardous materials are removed from the solid waste load.

First, you must know the identity of the substance and the particular risks that are associated with it. The identity of the material should be on the container label or the packaging slip. Risk information on the substance can also be found on the label or in the Material Safety Data Sheet book located in the wall outside of the Shop Manager's office. The risk assessment must consider the danger of the material, integrity of the container, and the potential area of danger should the material escape.

A word that may help you manage a spill is L. Benner's D.E.C.I.D.E. system for managing hazardous materials incidents. D.E.C.I.D.E. is an acronym which stands for the following steps which provide a framework for making emergency decisions during an incident.

D - Detect hazardous materials presence.

E - Estimate likely harm without intervention.

C - Choose response objectives.

I - Identify action options.

D - Do best option.

E - Evaluate progress.

The integrity of the container can be determined by applying the second step of the D.E.C.I.D.E. process; namely, estimating the likely harm without intervention. This step involves determining the stresses applied to the container and what their effect will be on the container. These stresses may be in the form of thermal, mechanical, or chemical attack on the container. If the stress applied to the container exceeds the container's ability to dissipate the stress, the container breaches and the contents are released. (Benner, L. "D.E.C.I.D.E. in Hazardous Materials Emergencies," Fire Journal 7/75)

If, after analysis of the situation, the risk to perform a cleanup appears high, keep the situation under control, and have the experts come in to do the job. Avoid all unnecessary risk to GSS Transfer's employees. Spill cleanup firms are listed in Section V, E. and VII, A.3 of this plan. Should the decision be made to clean up the spill, proceed with caution.

With most spills, containment is the first response priority. In some cases, containment may be accomplished by forming a berm of absorbent material around the spill, turning the power off to a pump, or up-righting a drum or rolling it so the hole is on top. In other cases, the best response may be immediate evacuation of the area. Most of the chemicals or fuel can be absorbed with "kitty litter," diatomaceous earth. Caution employees not to track the substance around as it all has to be cleaned up.

Extinguish any sources of ignition in the area if the spill involves a flammable or combustible substance. When dealing with flammable or combustible materials, use non-sparking tools such as a plastic shovel. Surround spills with absorbent material and using a push-broom or squeegee, slowly move absorbent from the outside of the spill to the source as the material is absorbed. Remember that the resulting waste absorbent must be packaged and managed as hazardous waste if any of the components are hazardous by EPA or DEQ definition.

Diluted acids and bases can be neutralized. Do not try to neutralize undiluted or strong acids or bases as copious amounts of corrosive gas are produced. The corrosive gas is deadly and dangerous to the respiratory system, eyes, and skin. The gasses will corrode and destroy metal materials or machinery that come in contact with it.

B. SPECIFIC CHEMICAL MEASURES

Household Products contained solvents such as ACETONE & METHYL ETHYL KETONE

HEALTH HAZARD DATA

Inhalation: Exposure to vapors or mists may be moderately irritating to the respiratory tract. Symptoms of exposure may include: headache, dizziness, loss of coordination, drowsiness, and other symptoms related to central nervous system depression and a narcotic effect.

Eye contact: Exposure to vapors, mists or liquid may cause moderate eye irritation. Symptoms of exposure may include: watering, redness, and possible swelling. At high concentrations, exposure may cause corneal damage and visual impairment.

Skin contact: Exposure to vapors, mists or liquid may cause moderate skin irritation. Symptoms of exposure may include: redness, dry, cracked skin, and a burning sensation. Product may be absorbed through the skin in harmful amounts.

Ingestion: Aspiration hazard. This product can enter the lungs and cause severe damage during swallowing or vomiting. Symptoms of exposure may include: nausea, vomiting, lethargy and diarrhea. In extreme situations, ingestion may cause liver and kidney damage.

FIRE AND EXPLOSION DATA

Unusual fire and explosion hazards: These chemicals are extremely flammable. Vapors form explosive mixtures with air and are dangerous when exposed to heat, sparks, flame or oxidants. Handle as very flammable liquid. Use water spray to keep fire-exposed-tanks and containers cool. Do not enter the fire area without proper personal protective equipment including self-contained breathing apparatus.

**Household Products contained solvents such as
ACETONE & METHYL ETHYL KETONE, Continued**

SPILL OR LEAK PROCEDURES – (Always wear recommended personal protective equipment.)

Steps to be taken in case material is spilled or released: Eliminate all sources of ignition in the vicinity of the spill or released vapors. Isolate the spill area. Permit only trained personnel wearing full personal protective equipment to enter the spill area. Terminate the leak immediately, if possible. Collect the spill in a waste container for disposal. Then flush the spill area thoroughly with water; wash contaminated equipment thoroughly with water.

Management of Waste: Flushings and wash water must be contained and prevented from entering a waterway. Spills of acetone and MEK should be reported to federal, state and local environmental agencies, including the National Response Center (800-424-8802).

**Cleaning Products and Drain Cleaners containing
CAUSTIC SODA LIQUID 30% & 50%, LYER, SODIUM or POTASSIUM HYDROXIDE**

HEALTH HAZARD DATA

Inhalation: Inhalation of mists may be severely irritating or corrosive to the nose, mouth, throat and lung. Exposure may cause burns to the respiratory tract with the production of lung edema which can result in shortness of breath, sneezing, choking, chest pain and impairment of lung function. Inhalation of high concentrations may result in permanent lung damage.

Eye contact: Exposure to liquid or mists can cause severe irritation and/or burns, with symptoms of tearing, redness, swelling and pain. Corneal damage with impairment of vision may result from direct contact with liquid.

Skin contact: Exposure to liquid or mists can cause severe irritation and/or burns characterized by redness, swelling and scab formation. Prolonged skin exposure to liquid may cause destruction of the dermis with impairment of the skin to regenerate at site of contact. No published data indicates material is absorbed through the skin.

Ingestion: Ingestion can cause severe irritation and/or burns to the entire gastrointestinal tract, including the stomach and intestines, characterized by nausea, vomiting, diarrhea, abdominal pain, bleeding, and/or tissue ulceration.

SPILL OR LEAK PROCEDURES

Land spill: Wear recommended protective clothing. Dike the spill using soil, sand or a compatible commercial absorbent. Pick up bulk of liquid using pumps or vacuum truck or absorb liquid in sand or commercial absorbent. Place liquid in approved containers for recovery or disposal. Neutralize remaining traces of material with any diluted inorganic acid, such as hydrochloric, sulfuric, nitric, etc. The spill area should then be flushed with water, followed by a liberal covering of sodium bicarbonate. Collect rinsate and containerize for disposal. Prevent run-off from contaminating sewers, streams, or other bodies of water.

Water spill: This solution is heavier than water and is also completely soluble in water. Stop or divert water flow. Dike contaminated water and remove for disposal and/or treatment. Notify all downstream users of possible contamination.

LACQUER THINNERS & CLEANING SOLVENTS

HEALTH HAZARD DATA

Ingestion: Causes gastrointestinal distress. In the unlikely event of ingestion, call a physician immediately and have the names of ingredients available.

Inhalation: May cause nose and throat irritation. Repeated and prolonged overexposure to solvents may lead to permanent brain and nervous system damage. Eye watering, headaches, nausea, dizziness and loss of coordination are signs that solvent levels are too high. If affected by inhalation of vapor or spray mist, remove the person to fresh air. If breathing difficulty persists, or occurs later, consult a physician.

Skin or eye contact: May cause irritation or burning of the eyes. Repeated or prolonged liquid contact may cause skin irritation with discomfort and dermatitis. In case of eye contact, immediately flush with plenty of water for at least 15 minutes; call a physician. In case of skin contamination, wash with soap and water. If irritation occurs, contact a physician.

FIRE AND EXPLOSION DATA

Extinguishing media: Water spray, foam, carbon dioxide, dry chemical

Special firefighting procedures: Full protective equipment, including self-contained breathing apparatus, is recommended. Water from fog nozzles may be used to cool closed containers to prevent pressure build up.

Unusual fire and explosion hazards: When heated above the flash point, emits flammable vapors which, when mixed with air, can burn or be explosive. Fine mists or spray may be flammable at temperatures below the flash point.

SPILL OR LEAK PROCEDURES

Steps to be taken in case material is released or spilled: Ventilate area. Remove sources of ignition. Prevent skin contact and breathing of vapor. Wear a properly fitted vapor/particulate respirator (NIOSH/MSHA TC-23C). Confine and remove with inert absorbent.

Management of Waste: Do not allow material to contaminate ground water systems. Incinerate absorbed material in accordance with federal, state, and local requirements. Do not incinerate in closed containers.

PAINT THINNER

HEALTH HAZARD DATA

Ingestion: Gastrointestinal distress. In the unlikely event of ingestion, call a physician immediately, and have the names of ingredients available.

Inhalation: May cause nose and throat irritation. Repeated and prolonged overexposure to solvents may lead to permanent brain and nervous system damage. Eye watering, headaches, nausea, dizziness and loss of coordination are signs that solvent levels are too high. If affected by inhalation of vapor or spray mist, remove person to fresh air. If breathing difficulty persists, or occurs later, consult a physician.

Skin or eye contact: May cause irritation or burning of the eyes. Repeated or prolonged liquid contact may cause skin irritation with discomfort and dermatitis. In case of eye contact, immediately flush with plenty of water for at least 15 minutes; call a physician. In case of skin contact, wash with soap and water. If irritation occurs, consult a physician.

PAINT THINNER, Continued**FIRE AND EXPLOSION DATA**

Extinguishing media: Water spray, foam, carbon dioxide, dry chemical.

Special firefighting procedures: Full protective equipment, including self-contained breathing apparatus, is recommended. Water from fog nozzles may be used to cool closed containers to prevent possible pressure buildup.

Unusual fire & explosion hazards: When heated above the flash point, emits flammable vapors which, when mixed with air, can burn or be explosive. Fine mists or sprays may be flammable at temperatures below the flash point.

SPILL OR LEAK PROCEDURES

Steps to be taken in case material is released or spilled: Ventilate area. Remove sources of ignition. Prevent skin contact and breathing of vapor. Wear a properly fitted vapor/particulate respirator (NIOSH/MSHA TC-23C). Confine and remove with inert absorbent.

Management of Waste: Do not allow material to contaminate ground water systems. Incinerate absorbed material in accordance with federal, state, and local requirements. Do not incinerate in closed containers.

PHOSPHATE CLEANER**HEALTH HAZARD DATA**

Eyes: Sever irritant, cause's burns to eyes.

Skin: Causes severe irritation or possible burns to skin.

Inhalation: Breathing of vapors or mists could produce harmful effects to respiratory system.

Ingestion: Swallowing of this material might be harmful or fatal.

FIRE AND EXPLOSION DATA

Extinguishing media: Product is not combustible

Special firefighting procedures: When firefighting, wear full protective equipment including self-contained breathing apparatus.

Unusual fire and explosion hazards: May produce hazardous fumes or hazardous decomposition products. Contact with some soft metals like aluminum and zinc can generate flammable/explosive hydrogen gas. Extinguish all nearby sources of ignition since flammable hydrogen gas will be liberated from contact with some metals.

SPILL OR LEAK PROCEDURES

Steps to be taken in case material is released or spilled:

Small spill: Use an approved inert material to absorb spilled product or neutralize spill with small quantities of lime or sodium carbonate and flush to sewer.

PHOSPHATE CLEANER, Continued

Large spill: Contain spill immediately. Wearing recommended protective equipment, carefully add lime or sodium carbonate to neutralize acid. Neutralized spill may be flushed to sanitary sewer pending approval of local authorities. Keep un-neutralized spill out of sewers, storm drains or waterways.

Management of Waste: This product must be disposed of properly under federal/state regulations for industrial wastes. This product when spilled or disposed of is a non-hazardous waste as defined in RCRA regulations (40 CFR 261).

**Products Containing SODIUM HYPOCHLORITE
Such as Comet Cleanser, Bleach, and Swimming Pool Chemicals**

HEALTH HAZARD DATA

Inhalation: Strong irritant to tissue.

Skin or eye contact: May cause irritation or burning of the eyes. Exposure may cause moderate skin irritation. Symptoms of exposure may include redness and dry, cracked skin.

Ingestion: Toxic by ingestion.

FIRE AND EXPLOSION DATA

Unusual fire and explosion hazards: Fire risk in contact with organic materials.

SPILL OR LEAKED PROCEDURES

Steps to be taken in case material is spilled or released:

Small spill: A small spill can be rinsed into the drain which goes to the sanitary sewer.

Large spill: Clean up sills of liquid with an absorbent material and place in containers for disposal. Clean up solid spills by sweeping up spilled material and placing in containers for disposal.

Management of Waste: Waste material must be disposed of in accordance with federal, state, and local environmental regulations.

PESTICIDES AND HERBICIDES**HEALTH HAZARD DATA**

Health hazards vary as there are so many different products in this category.

SPILL OR LEAK PROCEDURES

Steps to be taken in case material is spilled or released: Since these products vary so much and the hazards can be very different depending on the particular product, it is best to treat them all as hazardous. Clean up spills of liquid with an absorbent material and place in containers for disposal.

Management of Waste: Waste material must be disposed of in accordance with federal, state, and local environmental regulations.