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**RASCO MATERIALS, LLC**

## **Materials Handling Plan**

This Material Handling Plan (the Plan) is prepared with the intent to maintain proper documentation of all incoming and outgoing material and to ensure proper handling of material to avoid spillage of any petroleum contaminated soil (PCS) to the environment.

On-site storage of PCS involves consideration of location and quantity, both of which are limited by conditions contained in RASCO's Part 360 permit. It is the responsibility of the PCS Inbound and the EarthPave Outbound Coordinator to document all incoming PCS and outgoing EarthPave quantities and to know, at any point in time, how much material can be accepted and stored in the Processing Building A and the Storage Building B.

### **Material Acceptance**

Before incoming material is accepted, a generator profile certificate and a Pre-Qualification Waste Characterization Form (Appendix D) with accompanying laboratory data must be received in advance of the truck arrival. A Non-Hazardous Waste Manifest must accompany each truckload and will be checked for completeness. A RASCO supplied Non-Hazardous Waste Manifest, or an approved alternate, will be used to provide the necessary information. Material will be visually inspected for foreign material (see Section 2.4.2 of the Engineering Plan for a complete description of the acceptance protocols). In addition to the documentation (lab results for EPA Methods 8015, 8100, 8021, or 8260 as appropriate) which identifies the total petroleum hydrocarbon levels at the point of generation, RASCO may conduct random testing of individual PCS truckloads to further ensure quality control within the process. The portable test method for this additional quality control procedure is further described in the O&M Manual.

### **Material Handling**

The following measures will be taken to prevent release of any contaminants present in the PCS to the environment before and during the manufacturing operations and during the curing period:

1. Material will not be deposited on the land or outside of the processing building to prevent PCS or any leachate from entering surface or groundwater. This will be accomplished by storing and processing all PCS inside an enclosed structure with a concrete floor that does not contain any floor drains. This will eliminate the risk of any contaminant being

released to the environment. This will also prevent precipitation and stormwater runoff from coming in contact with the PCS;

2. Windowed areas in the storage building will be built up and/or covered with a heavy duty, clear, colorless poly-plastic to prevent rainwater from running or being blown inside the building and saturating the pile. This will eliminate the creation of leachate inside the building;
3. Roof holes will be repaired;
4. Tears and punctures of the poly-plastic will be fixed within 72 hours of the damage being noted on a Daily Inspection Report (Appendix D) and submitted to management;
5. Debris (i.e. foreign material) is frequently found mixed with the non-hazardous PCS when it is received from the generator. Such debris typically includes wood, plastics (including plastic truck bed liner), metals, etc. The debris will be hand-separated and removed from the PCS at various steps prior to processing. The recovered debris will be placed in a covered dumpster dedicated as waste debris. The debris-filled dumpster will be collected by a licensed hauler and disposed of at an approved regulated facility;
6. Confining all PCS and EarthPave materials within covered storage buildings greatly mitigates any release of dust to the environment. Front-end loaders will pick-up and deposit PCS in a controlled manner to minimize the creation of any dust;
7. Transporters (deliveries and final product transport) are requested to have their loads covered to prevent dust migration. Roadway dust will be controlled by the application of calcium chloride, a commonly used control measure, on an as needed basis;
8. Transport (internal) of material between buildings will be controlled to prevent the spillage of material on to the site roadways in the following manner:
  - a) Traffic will move at a speed not to exceed 5 miles per hour;
  - b) Material will only be transported by dump trucks;
  - c) Truck will be covered and not overloaded; and
  - d) Equipment decontamination. The decontamination area for the cleaning of the PCS handling equipment will be in the PCS unloading/storage area. Decontamination methods will include brushing off soil from the equipment onto the existing PCS stockpile. The equipment will be brushed free of soil at the end of each day during operation of the facility, after handling of PCS is completed for each project, and

anytime equipment is removed from the facility. Tires will be brushed to be free from PCS when leaving Building A and/or B.

9. On-site roadways will be passable and maintained in good condition at all times.
10. No salvaging will be permitted at the facility.

### **Foreign Material**

RASCO requests that, to the extent possible, prior to sending the PCS to RASCO's facility, all PCS generators remove foreign material such as C&D waste (plaster, wood, etc.) plastics, metals, and large rocks. Using its Incoming PCS Acceptance Criteria, RASCO notifies the generators in advance that debris must be kept to a minimum. All remaining debris will be separated from the PCS before processing. Quality control, including the elimination of foreign material, is a multiple step process which incorporates: minimizing acceptance of PCS containing excessive foreign material, hand removing material upon receipt in the processing building, and removal of the remaining foreign material before its enters the grizzly screen.

**Unauthorized Waste** - Control measures will be taken to ensure that only PCS that is authorized to be processed at this facility is accepted and any unauthorized waste or materials will be refused. Each shipment must be accompanied by a Non-Hazardous Waste Manifest which includes data from required soil tests described earlier in Section 2.4.1.2 of this report. Any soil not meeting the established acceptance criteria will be rejected. RASCO reserves the right to either reject loads that contain unacceptably high quantities of C&D debris or it may charge an additional tipping fee to account for additional work necessary to process such material.

Plastics, wood, etc. will be collected and stored in a dedicated container for removal by a licensed waste hauler.

### **Waste Handling During Facility Shutdown**

If a breakdown of PCS handling equipment occurs, the equipment will either be replaced with an equivalent apparatus or PCS acceptance will cease until the equipment is repaired and returned to service. If cold-mix asphalt production equipment breaks down, it will be repaired as quickly as possible. Acceptance of PCS will continue only until the 1,000 ton storage threshold is reached. If asphalt production equipment is not returned to service by the time this threshold is reached, no additional PCS will be accepted.

### **Product Which Fails Guidance Criteria**

Finished cold-mix asphalt product will be tested according to the procedures described in Section 2.4.1.4 of the Engineering Report. Any finished product that does not meet the TCLP criteria for protection of groundwater listed in the DEC STARS Memo #1 will be retested. If the TCLP criteria are not met, the failed PCS batch will either be reprocessed or disposed of as solid waste at an off-site regulated facility.

### **Fugitive Dust Control**

Minor amounts of fugitive dust may be generated on site during PCS unloading, as well as during the movement of the trucks and loaders themselves. Primary dust control is accomplished by having all unloading and processing operations take place inside a covered building. Controlled handling of PCS from the pile to the hopper further mitigates the creation of fugitive dust. Roadway dust will be controlled with applications of calcium chloride, a commonly used dust suppressant.

### **Training Procedures**

Training of PCS management staff will occur upon issuance of the facility's Part 360 permit, and once per year thereafter. Training will be provided for RASCO PCS management staff on the following topics: permit requirements and conditions, operating procedures, operation and maintenance plan procedures, records documentation, and emergency response. Training materials will be kept on file.

All personnel involved in the receipt and handling of PCS will be instructed as to the safe operation of material handling equipment (i.e., front-end loaders) and appropriate storage pile construction. They will also be instructed as to:

- a) the nature and characteristics of PCS along with its safe and environmentally appropriate handling;
- b) restrictions on the types of material accepted;
- c) the waste control and testing protocols established for the facility;
- d) recognition of incoming loads that may contain unauthorized waste. Such training will include discussions of unacceptable wastes and how to recognize and prevent unacceptable wastes from being accepted; and

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e) procedures involving equipment decontamination.

Training forms will be completed by each staff member who receives the PCS management training, and pertinent records will be kept for all employees.