

BROOKFIELD RESOURCE MANAGEMENT COMPANY, INC.

HEALTH & SAFETY PLAN

TOWN OF WAYWAYANDA, ORANGE
COUNTY, NY RECYCLING FACILITY

PRELIMINARY DRAFT

6/13/2011

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1.0 HAZARD COMMUNICATION

1.0 Workplace Chemical List

1. Brookfield will maintain a list of hazardous chemicals normally present in the workplace in excess of 55 gallons (or 500 pounds). This workplace chemical list will be developed for each workplace location where such quantities of hazardous chemicals are used or stored and will be available for review by employees and their designated representatives.
2. The Operations Manager (or their designee) will be responsible for reviewing and updating the workplace chemical list as necessary, but at least by December 31st of each year.
3. The workplace chemical list will be maintained for at least 30 years.
4. Further information on chemicals listed on the workplace chemical list can be obtained by referring to the Material Safety Data Sheet (MSDS) located in each workplace where these chemicals are used or stored.

1.1 Material Safety Data Sheets

1. Brookfield will maintain a current and appropriate MSDS for each chemical purchased.
2. Incoming MSDSs will be reviewed for new and significant health/safety information and that information is passed on to affected employees.
3. Hazardous chemicals received without an MSDS are withheld from use until a current MSDS is obtained.
4. Missing MSDSs will be requested from an appropriate source (chemical manufacturer, supplier, or electronic database) within 30 days from receipt of the chemical.
5. Affected employees will be notified of any alternative system (such as electronic databases) being used in lieu of hard copy MSDSs.
6. Emergency responders are provided MSDSs as soon as practical upon request. Copies of MSDS will be maintained in the scale house for responders entering the site.
7. MSDS files for the facility will be kept in the administrative office in the logistics building and will be readily available to all employees and their representatives.

1.2 Chemical Container Labels

1. All containers of hazardous chemicals stored will be appropriately labeled.
2. All primary containers will be clearly labeled to include:
 - a. The identity of the chemical as it appears on the MSDS;
 - b. The appropriate hazard warnings; and
 - c. The name and address of the manufacturer.
3. All secondary containers of hazardous chemicals will be clearly labeled to include:
 - a. The identity of the chemical as it appears on the MSDS; and

- b. The appropriate hazard warnings.
-
- 4. A description of alternative labeling systems, if needed, will be provided to employees.
 - 5. Brookfield will rely on the chemical manufacturers or distributors to provide labels which meet the above requirements for primary containers of all hazardous chemicals purchased, and will re-label containers only when the label is illegible or otherwise does not meet requirements.

1.3 Hazard Communication Training

- 1. Brookfield will provide training to all employees who routinely use or handle hazardous chemicals in their workplace.
- 2. Human Resources (or their designee) will be responsible for providing training that includes, but is not limited to:
 - a. The contents and procedures of this Health & Safety Plan;
 - b. Emergency Response Planning;
 - c. The use of information provided on the MSDS and chemical container labels;
 - d. The location of hazardous chemicals in the work area;
 - e. The physical effects of exposure;
 - f. Use of personal protective equipment (PPE);
 - g. Safe handling of hazardous chemicals;
 - h. First aid treatment for exposure; and
 - i. Safety instruction on clean-up and disposal.
- 3. Required training records will be maintained that include:
 - a. The date of training;
 - b. List of employees;
 - c. Subjects covered; and
 - d. Name of instructor(s).
- 4. All covered employees will be incorporated into the training program.
- 5. Employees will be provided information concerning hazardous chemicals to which they may be exposed during non-routine tasks.
- 6. New employees will be trained prior to being required to use or handle a hazardous chemical.
- 7. The need for refresher training will be assessed.

1.4 Personal Protective Equipment

- 1. Brookfield will identify, through job hazard assessment, the PPE required for each employee.
- 2. Brookfield will provide PPE to all employees who use or handle hazardous chemicals or who perform work functions identified as requiring PPE.

3. Brookfield will provide training to employees for PPE for eyes, face, head and extremities, protective clothing, respiratory devices (if required), and protective shields and barriers as part of the Hazard Communication training.

2.0 FACILITY OPERATIONS

2.1 General

1. In all areas of buildings involving material loading, unloading or processing of materials, appropriate ventilation will be maintained.
2. Brookfield will maintain an Emergency Response Plan that includes procedures for response to fires, weather emergencies, and evacuation.
3. Brookfield will ensure the proper cleaning, inspecting and maintenance of the buildings and plant systems and will train competent maintenance personnel.
4. Brookfield will establish a program of periodic and regular inspection to identify conditions which may affect safe operations.
5. Signs will be placed conspicuously in hazard areas to communicate to employees the nature and degree of potential hazards in such a manner that they are not obscured by or subject to wear from moving parts.
6. Audible and visual start-up alarms will be provided for each automated processing system that will signal for 5 seconds, and there will be a delay of 20 seconds after the starting control is activated and the main motor(s) can be started.
7. Brookfield will require that contractors provide employees that are adequately trained for the scope of work assigned in the facility, taking into account the notifications provided by Brookfield regarding the work environment.

2.2 Entrance and Access

1. The main entrance/exit roads will be all weather in design and construction. Site roads will be designed and constructed to minimize interference with site drainage requirements. All roadways will be maintained in good working condition to ensure safe travel for customers and facility vehicles.
2. The entrance gate will have prominent signage displaying:
 - a. Facility site/name;
 - b. Site telephone number (24 hours);
 - c. Site operating hours;
 - d. Types of wastes accepted/prohibited;
 - e. Speed limit; and
 - f. No Smoking.
3. Policies and site-specific information, as applicable, will be posted at the scale house and communicated or distributed to anyone who uses the facility.
4. Brookfield will ensure smooth and efficient traffic flow that will be structured to accommodate peak unloading times. Employees will be trained in traffic rules and will be expected to set an example by complying with them.

5. Traffic control signs will be placed liberally on all roadways to avoid confusion by the customer. Areas designated for drivers to un-tarp/de-rig will be clearly marked.
6. All visitors will be required to check in at the scale house of logistics building and sign a visitors log. The log will contain at a minimum:
 - a. Date;
 - b. Persons name;
 - c. Company/organization they represent;
 - d. Telephone number;
 - e. Purpose of visit/individual visiting; and
 - f. Arrival/departure time.
7. Visitors will not be allowed access to processing areas without company personnel accompanying them.
8. Depending on the amount of traffic, use of spotters or traffic control personnel may be necessary to promote safe and orderly traffic flow in and out of buildings and processing areas. If spotters or traffic control personnel are used, they will be trained and provided appropriate PPE according to their job assignments.
9. An audible or visual warning signal will be provided on all mobile equipment owned, operated and maintained by the facility.
10. Operators of mobile equipment should be aware of the presence of other employees working adjacent to the area of operation and should avoid operations which may create a hazard to those affected employees.
11. Stop signs will be placed at the exit or just before entering any public roadway.

2.3 Material Handling

1. The design, operation supervision of tipping floors will take into account:
 - a. The vehicle traffic flow, entry and exit routes for traffic to and from the tipping area;
 - b. The volume of material to be loaded and handled in the tipping area;
 - c. The maneuvering requirements of mobile equipment;
 - d. The presence of personnel in the area; and
 - e. Personnel access and other factors in the facility which may present potential traffic related; and Material handling hazards.
 2. Minimum required spacing recommendations are as follows:
 - a. Full eject vehicle – 10 feet;
 - b. Rear dump – 15 feet;
 - c. End dump – length of trailer plus 10 feet; and
 - d. H.E. trailer – 15 feet.
 3. Only one person from a vehicle is allowed on the tipping floor.
 4. An adequate paved surface is provided for vehicles as they approach the tipping areas. Consideration will be given to the following whenever possible:
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- a. Vehicles should approach the tipping areas from the left (drivers) side, allowing the driver to have a clearer view of any vehicles already unloading and allowing better view of any spotter;
 - b. Provide an area 200 – 300 feet from any tipping areas for vehicles to park while un-tarping/de-rigging; and
 - c. Require vehicles to exit any tipping areas to the right (their left), avoiding conflict with incoming vehicles.
5. If it becomes necessary to “hold” traffic until an area is clear, drivers will be kept behind a stop line until signaled by facility personnel.
6. Pickups, cars and trailers will be directed to a separate area for unloading. These vehicles are generally unloaded by hand and should not be allowed to block areas accessed by larger trucks. It will be priority to provide operators of private vehicles clear instructors upon checking in at the facility.
7. Information regarding safety-related practices in unloading areas, such as PPE, will be provided to the facility by means of signs. Signs will be located so as to be clearly visible prior to entering the unloading area.
8. The layout of material storage areas will take into account the maneuvering characteristics of mobile equipment used to move material, including dimensions of the load (e.g., bales of fiber or end-of-life vehicles) to be handled.
9. The layout of material storage areas will provide access routes for employees, which provide at least 4 feet of separation from normal operating areas for mobile equipment. Such access routes should be maintained so as to be free of obstructions and provide a clearly defined path to exits.
10. Bales in a stack will be of consistent material composition and shape. Bales will be contained by straps, ties or similar devices in sufficient number for the type of material as well as the size and shape of the bale.
11. Bales stored in tiers will be stacked, blocked, interlocked or limited in height so that they are stable and secure against sliding or collapse. Straight stacks (one bale placed directly on top of another) will be limited to four (4) high. Any stacks higher will be offset in a stair-stepped fashion or arranged in an interlocking pattern beginning with the fifth layer or lower, or the stack will be contained by supplemental restraint devices or structures.
12. Loose, incomplete, or out-of-shape bales will not be stacked or used to support other bales.
13. Bales in stacks will be visually inspected each day for stability of the stack and condition of the bales. Immediate action will be taken to correct an unstable condition, such as identifying or removing bales that are not structurally sound.
14. Installation and operation of all processing equipment will be according to manufacturers recommended procedures and in conformance with applicable local, state and federal codes and ordinances.
15. Personnel are prohibited from riding on conveyors.

16. Guards will be provided to contain materials at the maximum design capacities of the conveyor by means of side skirts on all elevated or slant plane conveyors, to prevent overflow of materials at transition points or transfer points, and to prevent materials from overhead conveyors from falling onto work areas.
17. Machine guarding will be provided according to manufacturer's recommendations and applicable regulations.
18. End-of-life vehicles will not be stacked at an unsafe height.
19. Employees should not climb or lean on unstable surfaces, such as stacked metal or machinery. The additional weight or movement of a person climbing could cause the surface to collapse or the employee to fall. Employees should also not add additional materials or weight to already unstable areas by stacking materials. Any materials that are found to be stored unsafely should be moved carefully using proper machinery.

3.0 TRAINING

The following training may be required based on planned facility operations and will be provided to employees, as appropriate and required. In addition, additional training may be required and provided on an as-needed basis.

3.1 Powered Industrial Truck Operator Training

1. Providing specific training required by 29 CFR 1910.178 for employees authorized to operate powered industrial trucks (including fork lifts).

3.2 Walking-Working Surfaces

1. Employees will receive training in walking and working surfaces encountered at the facility.

3.3 Energy Control (Lockout/Tagout)

1. Brookfield will provide training to affected employees to ensure that the purpose and function of the energy control program are understood by the employees and that the appropriate knowledge and skills regarding energy controls are acquired by the employees where unexpected energizing or start-up of the machinery or equipment or release of stored energy could cause injury.

3.4 Confined Space

1. Brookfield will provide training to employees to ensure that employees are protected from the hazards of entry into permit-required confined spaces found in the workplace, if required.

3.5 Hearing Conservation

1. Brookfield will provide awareness training to employees regarding the hazards or risks that may be encountered from exposure to high noise levels and basic hearing conservation, if required.

3.6 Material Processing Equipment

1. Brookfield will provide training to employees engaged in the operation, cleaning, maintenance, service, or repair of material processing equipment to ensure that they are thoroughly familiar with and competent to operate and maintain the processing equipment to minimize the possibility of personal injury.

3.7 Electrical Safety Practices

1. Brookfield will provide training on electrical safety requirements necessary for the practical safeguarding of employees who face the risk of electrical shock that is not reduced to safe levels, or other injury resulting from direct or indirect electrical contacts in the workplace, as required.

3.8 Stormwater Pollution Prevention

1. Stormwater pollution prevention training will be provided in accordance with requirements of the General Permit and Stormwater Pollution Prevention Plan.

3.9 Specific Training

1. Other specific training may be provided for, but not limited to, the following:
 - a. Use of flammable or ignitable materials;
 - b. Spill Prevention, Control and Countermeasure
 - c. Safeguards, tools and PPE;
 - d. Working with ladders;
 - e. Conductive materials and apparel;
 - f. Cleanliness and housekeeping;
 - g. Portable electrical equipment inspection, handling and use;
 - h. Manufacturer's guidelines (equipment specific).

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**OPERATIONS &
MAINTENANCE PLAN**

**TOWN OF WAYWAYANDA, ORANGE
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INTRODUCTION AND POLICY

Brookfield Resource Management Company (Brookfield) has prepared this Operation & Maintenance Plan (O&M Plan) for its recycling facility located on Dolsontown Road in the Town of Waywayanda, Orange County, New York to establish responsible practices for the handling of scrap metals and other materials destined for recovery. The O&M Plan contains daily operating procedures and best management practices is intended to ensure that the facility operates in a manner that satisfies all laws, rules and regulations, and that employees are acquainted with their individual responsibilities.

Brookfield's Policy for operating recycling facilities consists of the following general principles:

1. Brookfield recognizes that each recycling service, activity and product we provide has a potential impact on the environment and the local community. Our objective is to minimize the environmental impacts and where practicable provide environmental benefit through sound operating procedures and best management practices identified both by regulation and voluntarily for our industry.
2. Brookfield recognizes that recycling facilities processing vehicles, scrap metals, fiber, plastics, cardboard, paper, and other recyclable material play a valuable role in society by recycling materials that can't be used in their present form. In the process, however, wastes may be generated that must be managed and disposed in an environmentally-responsible manner.
3. Brookfield will manage non-recyclable materials in a manner that prevents release to the environment, and direct them to properly-equipped energy recovery and/or disposal facilities in conformity with local solid waste regulations.
4. Brookfield will identify and comply with the environmental, health and safety legal requirements applicable to its operations and will maintain all required federal, state and local permits and approvals for its facilities.
5. Brookfield will identify risks associated with its on-site operations, and manage the hazards and minimize the releases it identifies using an appropriate combination of strategies.

1.0 GENERAL FACILITY INFORMATION

1.1 Facility Description and Materials Managed

The Brookfield Middletown facility (facility) is a vertically-integrated recycling facility located on Dolsontown Road in Middletown, Orange County, New York. Operations include the collection, reduction, separation, processing and shipment of scrap metals, plastics, paper/cardboard, and other recyclables. The facility operates as a Recyclables Handling and Recovery Facility, a Vehicle Dismantler, and a Scrap Metal Processor. Recyclable materials, typically in the form of end-of-life durable goods, are purchased from a broad spectrum of clients including scrap metal processors, automobile salvage companies, carting companies and contractors, and municipalities as well as individuals. The facility does not accept or handle municipal solid waste, hazardous waste, medical waste, or municipal stream recyclables such as cans and bottles.

The facility is comprised of an office building, scale house facility, fluids recovery area, a truck and equipment maintenance building, a covered recyclables pre-processing building, a non-ferrous metal and recyclables receiving facility, recyclables processing and packaging equipment, and a building devoted to separating non-ferrous metals and non-recyclable materials. All material processing areas are on concrete.

Materials managed at the facility include:

- Source-separated and comingled scrap steel, aluminum and copper;
- Obsolete vehicles and other end-of-life durable goods;
- Scrap wire;
- Obsolete appliances and scrap metal from municipalities and individuals; plastics and glass; and
- Cardboard/fibrous material.

The majority of the materials received at the facility will require minimal processing. Source-separated materials, such as copper piping, will cut to size if necessary, then baled or boxed and shipped. Large structural steel beams will be manually cut or sheared to a size suitable for the end user in preparation for shipment. Scrap wire will be stripped of insulation, cut to length, and packed for shipment.

Bulky inbound materials that contain an array of metals and/or other materials, such as end-of-life vehicles and appliances, will be reduced in size through a shredding process and then separated into distinct classes of recyclable materials including steel, copper, and aluminum. Fluids/refrigerants are recovered prior to processing and reused on site or recycled.

Cardboard and fibrous materials are delivered by carting companies and processed through a baler that compresses and binds the material for efficient transportation to markets.

All non-recyclable residues (NR) will be characterized, stored, and disposed according to applicable solid waste regulations.

2.0 ROUTINE OPERATION AND MAINTENANCE PRACTICES

2.1 Operating Procedures and Best Management Practices

2.1.1 Stormwater Pollution Prevention

1. The facility has been designed to control the quantity and quality of stormwater runoff. Process areas at the facility are paved and runoff is directed to a sediment forebay and detention basin. The first flush of stormwater is directed to the City of Middleton publically-owned treatment works (POTW) to enhance treatment prior to discharge. Material storage and process will be designed to minimize contact with stormwater runoff.
2. The facility operates under Standard Industrial Classification 5093 (Scrap and Waste Materials) and is subject to State Pollutant Discharge Elimination System (SPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, Permit No. GP-0-06-002. Accordingly, a Storm Water Pollution Prevention Plan (SWPPP) will be implemented at the facility. The facility will comply with the best management practices in Subparts M and N – Scrap Recycling and Waste Recycling to minimize impacts to storm water runoff from the facility through implementation of the SWPPP. This includes water quality sampling during storm events to evaluate effectiveness of structural controls and best management practices.

2.1.2 Recyclable Fluids Recovery

1. Elevated racks and vacuum system are used for extraction of vehicle fluids. All fluid draining, removal, and collection activities will be conducted on paved surfaces that allows protection of soil and groundwater. Paved surfaces are cleaned daily, or more frequently if spillage occurs, using absorbent materials that are collected and properly disposed.
2. Spill response kits are maintained at fluid recovery and storage areas at the facility.
3. All fluids shall be completely drained, removed, collected and stored for appropriate use or disposal. Fluids shall not be intentionally released to the ground or surface water.
4. End-of-life vehicles arriving at the facility are inspected upon arrival for leaking fluids and unauthorized waste. Leaks will be remedied or contained with drip pans to avoid releases to the environment and minimize the use of absorbents. Vehicles are stored only on impermeable surfaces.
5. Prior to vehicle crushing or shredding, and as soon as practicable upon entering the facility, the following potential environmental contaminants shall be drained, removed, deployed, collected and/or stored, as appropriate and in accordance with best management practices:
 - a. Fluids including engine oil, transmission oil, transaxle fluid, front and rear axle fluid, brake fluid, power steering fluid, coolant, and fuel;
 - b. Lead acid batteries;

- c. Small PCB capacitors, mercury switches, or other mercury-containing devices;
 - d. Refrigerants used in automobile air conditioning systems; and
 - e. Air bags (deployed or removed).
6. Employees will inspect under the hood and in the trunk for the possibility of a mercury switch that controls a courtesy lamp. If found, care will be taken not to break the devices upon removal. Mercury switches will be placed in a sealed container and marked “Mercury Switches for Recycling”. Mercury switches will be sent to a licensed recycler that recovers mercury.
 7. Deployed airbags may remain in vehicles. Un-deployed airbags must be deployed according to manufacturers’ instructions or removed and stored for reuse or proper disposal.
 8. Air conditioning units will be checked and refrigerants removed from all vehicles that enter the facility using United States Environmental Protection Agency (USEPA) approved recovery equipment. Refrigerant will be stored in a tank meeting federal Department of Transportation (DOT) or Underwriters Laboratories (UL) standards and sold only to certified reclaiming facilities or CFC collectors.
 9. Brookfield employees managing used refrigerant processes will be certified refrigerant technicians.
 10. Recovered fluids are pumped directly to discreet aboveground storage tanks equipped with secondary containment appropriate for the material stored. If this is not possible for any reason, fluids will be contained in an appropriate container for the specific fluid and closed. The containers will be in good condition and marked clearly and legibly as to their contents. Containers will be stored within secondary containment on paved surfaces.
 11. Lead acid batteries will not be stored on the ground. Batteries will be stored under cover that severely restricts water from coming into contact with batteries. Leaking batteries shall be stored in a leak-proof container separately from intact batteries (see Universal Waste Management).
 12. Small PCB capacitors, mercury switches, and other mercury-containing devices shall be stored in an appropriately labeled container for recycling and disposal.
 13. ASR generated by the material shredding process will be managed in a safe, timely and ecological manner. ASR will be collected and stored in a manner that will minimize contact with storm water. ASR will be temporarily stored in an approved containment area on site and prepared for shipping. ASR will be recycled whenever technologically feasible, and will be periodically characterized for proper management and disposal according to applicable federal, state or local solid waste regulations.

2.1.3 Universal Waste

1. All universal waste batteries will be stored inside the building in a manner that will minimize breakage and prevent releases of hazardous materials to the environment.

2. Universal waste batteries are not to be disassembled at the facility. However, the following activities may be performed as long as the casing of each individual battery cell is not breached and remains intact and closed:
 - a. Sorting batteries by type;
 - b. Mixing battery types in one container;
 - c. Discharging batteries so as to remove the electric charge;
 - d. Regenerating used batteries;
 - e. Disassembling batteries or battery packs into individual batteries or cells;
 - f. Removing batteries from consumer products.
3. Any solid waste generated as a result of these activities will be managed in compliance with applicable federal, state or local solid waste regulations.
4. Any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions will be put in a container.
5. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
6. A container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"
7. Universal waste batteries will be accumulated for no longer than 90 days from the date the batteries are received and Brookfield will be able to demonstrate the length of time that the universal waste has been accumulated.
8. All releases of universal wastes and other residues from universal wastes must be immediately cleaned up and contained. Brookfield will determine whether any material resulting from the release is hazardous waste, and if so, will manage the hazardous waste in compliance with all applicable requirements.
9. Universal waste will not be sent or taken to a place other than another universal waste handler or a destination facility.
10. The facility will keep a record of each shipment of universal waste sent from the handler to other facilities. The record may take the form of a log, invoice, manifest, bill of lading or other shipping document. The record for each shipment of universal waste sent must include the following information:
 - a. The name and address of the universal waste handler, destination facility, or foreign destination to whom the universal waste was sent;
 - b. The quantity of each type of universal waste sent (e.g., batteries, pesticides, thermostats);
 - c. The date the shipment of universal waste left the facility.

2.1.4 General Facility Operations

1. The facility will comply with all requirements of 15 NYCRR 81 – Procedures Relating to Vehicle Dismantlers and Other Persons Engaged in the Transfer of Junk and Salvage Vehicles, and will be registered with the New York State Department of Motor Vehicles.
2. The facility will maintain and comply with the manufacturer’s recommended operations manual for the shredder equipment that includes, but is not limited to, operational practices for start-up, shutdown, normal operation, and emergency conditions.
3. Upon the receipt of an end-of-life vehicle, the date that it is received will be recorded and maintained on site. All loads are to be inspected according to the Brookfield Resource Management Inbound Materials Inspection Protocol.
4. No more than 1,000 waste tires off vehicles will be stored at the facility at any one time.
5. Brookfield will ensure the safe storage of vehicles at the facility, including the minimal stacking of automobiles.
6. Access to and use of the facility will be continuously controlled by fencing, gates, signs or natural barriers. All visitors will be required to stop at the scale house and sign in and out on a visitors log. The checker, scale person, or office receptionist should verify proper access to everyone seeking entry to the site.

2.1.5 Reporting

1. Brookfield will keep a record of the name, address and identification number of the party from whom vehicles and major component parts were acquired, together with either a description or number of such vehicles and parts or the weight of the acquisition in accordance with 15 NYCRR 81 requirements.
2. An annual report shall be submitted to the NYSDEC by March 1, including, but not limited to, the following:
 - a. The number of end of life vehicles received at the facility;
 - b. The number of end of life vehicles crushed and removed from the facility;
 - c. The number of end of life vehicles stored at the facility at the end of the reporting year;
 - d. The approximate area at the facility used for storage of end of life vehicles;
 - e. The quantities of waste vehicle fluids extracted from end of life vehicles received and their disposition, including the quantity sold, used on-site, stored on-site, and disposed; and
 - f. The number and if applicable nature of any violation of all applicable rules and regulations of the state.

2.2 Maintenance Procedures

1. All equipment will be maintained in good working order consistent with industry standards and practices for similar facilities. Manufacturers recommended maintenance

schedules will be maintained for all equipment. Records will be maintained of inspection results.

2. Bales of recyclables in stacks shall be visually inspected daily for stability of the stack and condition of the bales. Immediate action shall be taken to correct an unstable condition, such as identifying and removing bales that are not structurally sound.
3. Vegetation will be controlled to prevent encroachment into fire access lanes or driveways at the facility and to decrease the potential of fire.
4. Periodic inspections and maintenance of mobile equipment will be conducted to assure that required safety devices are properly functioning and to remove equipment from service until safety related deficiencies are repaired or corrected.
5. Fire extinguishers will be visually inspected monthly and undergo annual maintenance. All fire extinguishers will remain fully charged or removed from service and immediately replaced.
6. Regular facility inspections will be performed in accordance with the procedures contained in the SWPPP. If during a facility inspection, a best management practice is found to not be performing effectively, maintenance must occur before the next anticipated storm event, or as necessary to maintain the best management practice. If maintenance before the next anticipated storm event is not possible, maintenance should be scheduled and accomplished as soon as practicable. Routine inspections are generally conducted after rain events (e.g., typically those greater than 1 inch of rainfall), during stormwater sampling events, and annually. Inspection information is recorded on the Facility Inspection and Maintenance Forms in the SWPPP.
7. Prevention of pests will be the primary strategy to hinder their establishment and reduce the need for pesticide use. During regular facility inspection, pest sites will be identified and monitored for required action by pest control contractor(s). Management strategies will be selected after consideration of all available options, including structural, nonchemical, and biological measures. Chemical measures will be used only as a last resort when other methods fail.

3.0 EMERGENCY RESPONSE

3.1 Emergency Telephone Numbers

Table 1 Emergency Contact Numbers

Fire/Police/Medical Emergency	911
Ambulance	(845)343-1212 (Mobile Life Support)
Hospital Orange Regional Medical Center 60 Prospect Ave Middletown, NY	(845)343-2424
National Poison Control	(800)222-1212
NYSDEC (Petroleum Spills)	(800)457-7362
National Response Center	(800)424-8802

3.2 Spill Response

Several individuals and organizations must be contacted in the event of a spill of hazardous materials at the facility. The Brookfield Operations Manager is responsible for ensuring that all required discharge notifications have been made. All discharges must be reported to the Operations Manager.

All petroleum spills that occur within New York State must be reported to the NYSDEC Spill Hotline (1-800-457-7362) within two (2) hours of discovery, except spills which meet **all of the following criteria:**

1. The quantity is known to be less than 5 gallons; and
2. The spill is contained and under the control of the spiller; and
3. The spill has not and will not reach the State's water or any land; and
4. The spill is cleaned up within 2 hours of discovery.

A spill is considered to have not impacted land if it occurs on a paved surface such as asphalt or concrete. A spill on grass or in a soil or gravel parking lot is considered to have impacted land and is reportable.

For any discharge that reaches navigable waters, or threatens to reach navigable waters, *immediate* notification must be made to the National Response Center Hotline (800-424-8802) and to the USEPA. A written notification will be made to USEPA for any single discharge of oil to a navigable waters or adjoining shoreline waterway of more than 1,000 gallons, or for two discharges of 1 bbl (42 gallons) of oil to a waterway in any 12-month period. This written notification must be made within 60 days of the qualifying discharge, and a copy will be sent to the NYSDEC, which is the state agency in charge of oil pollution control activities.

The following is a summary of actions that must be taken in the event of a discharge. It summarizes the distribution of responsibilities among individuals and describes procedures to follow in the event of a discharge.

1. Facility personnel must shut off all ignition sources in the area of the release to prevent fire and/or electrocution, including welding/cutting equipment, pump motors and electrical circuits.
2. Facility personnel should determine the source of the discharge, and if safe to do so, immediately shut off the source of the discharge.
3. If safe to do so, facility personnel must use resources available at the facility to stop the spilled material from spreading. Measures that may be implemented, depending on the location and size of the discharge, include placing sorbent material or other barriers in the path of the discharge (e.g., absorbent socks and wipes). Facility personnel are authorized to clean up incidental spills only, defined as less than 10-gallons in size.
4. In the event of a significant discharge (>10 gallons), field personnel must immediately deploy the spill response materials and contact the Brookfield Operations Manager, who may obtain assistance from authorized company contractors and direct the response and cleanup activities.

3.3 Fire/Medical Emergency

1. In case of a fire or medical emergencies, employees should contact the Operations Manager by radio as soon as possible. The Operations Manager will make a telephone call to 911.
2. If the Operations Manager can't be reached immediately, employees should call 911. State your name, your location, and the nature of the call. Speak slowly and clearly. Wait for the dispatcher to hang up first. On occasion the dispatcher may need additional information or may provide you with additional instructions. Make this call from a safe location.
3. If an employee discovers a fire in its incipient stages and feels comfortable extinguishing the fire, the employee may react according to their training using portable fire extinguishers.
4. In the event facility evacuation is necessary, employees will be notified. All employees will meet at the Evacuation Rally Point at the entrance to the facility scale on Dolsontown Road.
5. Portable fire extinguishers are available in all buildings and can be used for small fires. However, an immediate readiness to evacuate is essential. Never enter a room that is smoke filled.
6. Before opening doors check to ensure it is not hot to the touch. If hot do not open. If warm open slowly to check room / hallway conditions.
7. It may be necessary verbally announce the alarm, if people are still in the building. This should be done while exiting the building.

8. Persons discovering an unknown **fire, smoky condition, or explosion** should contact the Operations Manager/call 911.

3.4 Adverse Weather

1. Severe weather can adversely affect the operation of the facility. Facility management will routinely monitor weather forecasts in order to ensure the facility is prepared for and able to respond to projected weather conditions and make informed decisions about whether to close the facility or temporarily cease operations.
2. If impending severe weather warrants closure of the facility, employees will be notified by their supervisor and released from work.
3. In the event of sudden severe weather events, employees will be notified and instructed to shelter in-place inside the logistics building at the facility until the threat has diminished.