NEW ENGLAND WASTE SERVICES OF VERMONT, INC.

OPERATING LANDFILL

21 Landfill Lane
Coventry, Vermont

APPLICATION FOR FACILITY RE-CERTIFICATION

August 8, 2014

Prepared By:

New England Waste Services of Vermont, Inc.
Permits, Compliance & Engineering
220 Avenue B
Williston, Vermont 05495

New England Waste Services, Inc.

220 Avenue B
Williston, VT 05495
(802) 651 - 5454

August 4, 2014

Mr. Jeff Bourdeau
State of Vermont Agency of Natural Resources
Waste Management and Protection Division
Certification and Compliance Section
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704

Re: New England Waste Services of Vermont, Inc, (NEWSVT)
Landfill – Coventry, Vermont
Solid Waste Management Facility Identification Number OL510
Application for Vermont Solid Waste Management Facility Re- Certification

Dear Mr. Bourdeau:

NEWSVT (New England Waste Services of Vermont, Inc. writes to provide a Facility Re-Certification application for our operating landfill in accordance with Condition #14 of the existing Facility Certification.

Consistent with VTANR Rule 6-303(c), NEWSVT is requesting a 10 year Certification. The completed Business Disclosure and Personal History Disclosure Forms are provided separately and we are requesting that they also be utilized for the CV Landfill, Inc., Bristol Waste Management, Inc. and Newbury Waste Management, Inc. Certification Applications.

To help ensure that this application is complete, we have listed the appropriate response to the procedures under the applicable Rules as listed below.

§6-304 Application for Certification:

(a) *Any person required to obtain certification under §6-303 shall fully complete, sign and submit an application along with the appropriate fee, to the Secretary.*

This application has been signed in the appropriate locations on the form provided by the Agency of Natural Resources Waste Management & Prevention Division (Agency).

(b) *An application submitted by a corporation shall be signed by a principal executive officer of at least the level of vice-president or a duly authorized representative who is responsible for the operation of the facility. An application submitted by a partnership of a sole proprietorship shall be signed by a general partner or proprietor. An application submitted by a municipality, state or other pubic entity shall be signed by a principal executive officer, ranking elected official or other duly authorized employee.*

This application has been signed by duly authorized representative of NEWSVT.

(c) The Secretary shall not begin the processing of a certification until the applicant has fully complied with the application requirements, as identified by the Secretary, for the specific type of facility involved, including submittal of appropriate fees.

NEWSVT believes this submittal fully complies with the application requirements to make a final determination.

(d) The completion of the application shall be accomplished under the direction of a professional engineer licensed in the State of Vermont, unless this requirement is specifically waived by the Secretary for that application. The engineer shall make appropriate use of other disciplines to assure compliance with all applicable standards contained or referenced in these rules. The engineer shall certify that to the best of his or her information, knowledge and belief the applicant is in compliance with such standards. If the Secretary waives the requirement that the completion of the application is accomplished under the direction of an engineer, then the applicant is required to certify that the application is in compliance with such standards.

NEWSVT requests that this requirement be waived at this time. The facility is existing and no substantial changes to any engineering aspects are proposed in this application. NEWSVT believes that this application is in compliance with the State of Vermont Solid Waste Rules.

(e) Each application for certification shall be accompanied by a form provided for this purpose by the Secretary and the application shall include, at a minimum, the following information:

(1) siting, design and operations information sufficient to show compliance with Subchapters 5, 6 and 7, of these rules; or, in the case of Storage, Transfer and Recycling Facilities, with Subchapters 5 and 12;

Subchapter 5

6-502 Prohibited Areas – The facility is not located in any prohibited area as defined by 6-502 that has not already received a variance for such activity.

6-503(b) General Performance Standard (listed 6-503(b);

(1) that the isolation distance from the high seasonal water table, bedrock, and waters are sufficient to assure that an emission or discharge from the facility will meet all applicable environmental quality and public health standards and rules;

There are no changes proposed to this Recertification Application with respect to isolation distances that were approved in 2004 for Phase IV.

(2) that the isolation distances to public and private drinking water sources is sufficient to assure that an emission or discharge from the facility will not adversely affect drinking water;

There are no changes proposed to this Recertification Application with respect to isolation distances that were approved in 2004 for Phase IV.

(3) that the isolation distances from property lines, or any of the following not owned by the applicant: residences, schools, day care facilities, hospitals, and nursing homes, are sufficient to assure that the facility will not:

(A) result in objectionable odors off site of the facility;

There are no changes proposed to this Recertification Application with respect to isolation distances as it relates to the potential odors. There are no changes proposed other than the deployment of an interim synthetic cover material which could help with controlling any possible fugitive emission that might result in off site odor.

(B) result in an unreasonable visual impact off site of the of the facility;

There are no changes proposed to this Recertification Application with respect to isolation distances as it relates to the physical appearance of the facility.

(C) unreasonably increase the level of noise detectable off site of the facile; or

There are no changes proposed to this Recertification Application with respect to isolation distances as it relates to the level of possible noise sources.

(C) otherwise adversely affect public health.

There are no changes proposed to this Recertification Application that would otherwise adversely affect public health.

(4) That the minimum isolation distances for the facility or activity listed in Table A are met, or sufficiently increased, to make the demonstration under subdivisions (1), (2), and (3) of this subsection. Any facility, which is not listed in Table A, shall have an isolation distance to property lines of at least 50 feet.

Minimum Vertical Separation from Seasonal High Seasonal Water Table; See response to 6-503(B)(1) above.

Minimum Vertical Separation from Bedrock; See response to 6-503(B)(1) above.

Minimum Distance to Waters from the waste management boundary; There is no horizontal expansion proposed with the Re Certification Application, therefore this distance is not applicable at this time.

Minimum Distance from waste management boundary to drinking water source not owned by the applicant; There is no horizontal expansion proposed with the Recertification Application, therefore this distance is not applicable at this time.

Minimum Distance to property line from waste management boundary; There is no horizontal expansion proposed with the Recertification Application, therefore this distance is not applicable at this time.

Minimum Distance from waste management boundary to residences, schools, daycare facilities, hospitals, and nursing homes, not owned by the applicant; There is no horizontal expansion proposed with the Recertification Application, therefore this distance is not applicable at this time.

(5) That the facility is not located in areas that have serious development limitations, such as highly erodible soils, steep slopes, or do not have the physical capability to support the facility; There is no horizontal expansion proposed with the Recertification Application, therefore this requirement is not applicable at this time. However, this facility is not located on highly erodible soils, steep slopes and not in an area where the topography, hydrogelogically and geologically cannot support the facility.

(6) That the facility is accessible from a state or federal highway or a Class III or better town highway; and The facility is accessible from a State Highway vie VT Rout 5 and Airport Roads located in Coventry, Vermont.

(7) Discrete disposal facilities which may attract birds located within 10,000 feet of a runway used by turbo jet aircraft, or 5,000 feet of a runway used only by piston-type aircraft, shall not pose a bird hazard to aircraft. While the facility is located

within 5,000 feet of a piston-type airport runway, the existing United States Department of Agriculture Bird Management Program establishes a condition through its implementation reduces the risk of a bird hazard to aircraft.

Subchapter 6

With respect to Subchapter 6, our Operating Certification #OL510 Finding R of the 9th Amended Certification and the Compliance Monitoring Work Plan as prepared by Waite-Heindel Environmental Management, NEWSVT is in the process of compiling data to demonstrate compliance with the Groundwater Protection Rule and Strategy, as required in Finding R.

Subchapter 7

With respect to Subchapter 7, please refer to the attached proposed Facility Management Plan.

(2)(A) the name, mailing address, and phone number of the facility, and the name, signature, mailing address, and phone number of the owner of the facility, the operator of the facility, and the owner of the land on which the facility is located.

Please see the attached the Facility Recertification Application Form as well as the attached revised Facility Management Plan; both documents contain the required information.

(2)(B) If the operator is a different person than the owner of the land on which the facility is to be located, or is otherwise unable to demonstrate an unencumbered right to possession of the land, the owner of the land must sign the application for certification as a co-applicant and agree to be bound by the terms of the certification, except that this is not required for diffuse disposal facilities;

The operator and Owner are the same.

(3) the name, mailing address, and phone number(s) of the primary and any secondary contact persons;

The completed Facility Recertification Application Form has the required information.

(4) the name, signature, mailing address and phone number of the person preparing the application;

John Gay, E.I.
Permits, Compliance, and Engineering
New England Waste Services of Vermont, Inc.
220 Avenue B
Williston, Vermont 05495

802.651-5454

(5) *the type of solid waste management facility including all operational units;*

The facility is an existing Discrete Disposal Facility as outlined within Section 6-201 of the Vermont Solid Waste Management Rules.

(6) *the location of the facility, using the Vermont plane coordination system on the appropriate Vermont orthophoto tax map or through the use of a ground position system. The application shall also include a description of the limits on its horizontal and vertical development of the facility;*

The completed Facility Recertification Application Form has the required information.

(7) *a description of the proposed operation and future development of the facility in accordance with the engineering plans;*

The operation of the facility would remain unchanged as a solid waste disposal facility for non hazardous solid waste. Phase IV of the facility has sufficient capacity for the duration of the requested 10 year certification period. NEWSVT may request amendment for a future horizontal expansion within the 10 year certification period to provide continuous disposal capacity.

(8) *the amounts and types of materials to be managed at the facility;*

The proposed Facility Management Plan has the required information.

(9) *information sufficient, as defined by the Secretary pursuant to 10 V.S.A. Chapter 48, to show that the property on which the facility is located is classified as a Class III or Class IV ground water area;*

This is consistent with the existing certification. In addition, the required information has been submitted previously as part of the re-certification application.

(10) *evidence of compliance with the financial responsibility and capability requirements of Subchapter 9 of these rules or a plan for achieving compliance with these requirements prior to the issuance of a draft certification;*

The facility has an existing Financial Assurance Mechanism in the form of a Standby Trust Agreement with Keybank National Association.

(11) *unless otherwise exempt under Subchapter 10 of these rules, a closure and post-closure plan along with cost estimates, as defined in Subchapter 10;*

Proposed Closure and Post Closure Plans along with the associated cost estimates are provided with the Recertification Application.

(12) evidence of fee simple title in or an unencumbered right to possession of the property to be used for the facility, except this is not required for diffuse disposal facilities;

The Property Deed is unchanged and is on file with the Agency.

(13) evidence that the application complies with the planning requirements of 10 V.S.A. §6605(c). Such evidence may consist of a written supporting statement from the appropriate municipality, solid waste management district, solid waste alliance or regional planning commission that identifies the relevant part(s) of the plan(s). This evidence is not required in the case of a sludge or septage land application project;

This facility requires a Vermont Solid Waste Operator Certification and thus a Categorical Certification is not required.

(14) evidence of compliance with the disclosure requirements of the waste management personnel background review, pursuant to 10 V.S.A. 6605f;

The Business Disclosure and Personal History Disclosure Forms will be submitted separately.

(15) in the case where a municipal sold waste discrete disposal facility is proposed to be located within a 5 mile radius of an airport runway serving piston-driven or turbojet aircraft, evidence that the applicant has notified the Federal Aviation Administration (FAA) and the affected airport; and

The required information was previously submitted as part of the re-certification application.

(16) a list of the names and mailing addresses of persons and entities that have received notice and a copy of the certification application in accordance with 10 V.S.A. §6605(f).

This application will be hand delivered to the Town of Coventry and District 7 Environmental Commission on the same date it is hand delivered to the Agency provided all offices are open or on the next business day that the office is open.

(f) When a solid waste management facility includes more than one operational unit, such as multiple sites used for the land application of septage or sludge, the information required for the certification application shall be provided for all involved units.

The operational units include the discrete disposal facility and a residential drop off. Both operations are described in the proposed Facility Management Plan.

(g) Applicants shall keep records of all data used to complete applications and supplemental information submitted to the Secretary for a period of at least six (6) years from the date on which the application is signed, unless otherwise authorized by the Secretary.

NEWSVT will continue to keep records as required and continue to comply with this requirement.

(h)(1) Except as provided in §6-306(c), each application shall include a plan for effective public notice of the application. Such plan shall include provisions for a notice of the application to the general public by advertisement in at least two newspapers of general circulation in the area of the proposed facility, one of which shall be a regional weekly newspaper if one is available. The applicant shall provide the Secretary with a list of the names and mailing addresses of persons and entities that are to receive the public notice prior to distribution. The plan shall include provisions for sending notices of the application to:

A proposed Plan for Public Notice is included with the Recertification Application.

(A) the legislative body of the municipality in which the facility is proposed to be or is located, to any adjacent Vermont municipality if the facility is proposed to be or is located on a boundary, to the appropriate solid waste management district, and to the legislative bodies of all municipalities that will be served by the facility; for diffuse disposal facilities, public notice need only be sent to the municipality in which the facility is proposed to be or is located, and to any adjacent Vermont municipality if the facility is proposed to be or is located on a boundary;

(B) (i) For all facilities except those specified in Subsections (ii), (iii) and (iv) below, all residences and landowners within a one-half mile radius of the property boundary of the facility or the nearest one hundred (100) residences and landowners, whichever is the lesser number;

(ii) For diffuse disposal facilities, all residences and landowners within five hundred (500) feet of the proposed diffuse disposal area, and to all adjoining residences and landowners;

(iii) For sludge and septage storage and treatment facilities which are located at a wastewater treatment plant, except for those facilities treating the material to achieve PFRP (process to further reduce pathogens), all adjoining residences and landowners within one thousand (1000) feet of the facility; and

(iv) For all facilities, except diffuse disposal facilities, whose applications are determined to be minor by the Secretary, all adjoining residences and landowners.

(C) any other state agency or subdivision thereof that has issued or may be required to issue a permit for the facility; and

(D) the regional planning commission and the solid waste district or municipal alliance serving the City where the facility is located.

A proposed Plan for Public Notice is included with the Recertification Application.

(2) Except in the case of public notices of minor applications, the Secretary may reduce, for good cause shown, the requirements of subsection (h)(1)(B) of this Section if he or she finds that fewer notifications will still provide an effective notice of the application.

This is not applicable to this application.

(3) The public notice shall give general background information on the application (e.g. facility type, location, materials to be managed) and set forth the process for review of the application including opportunities for public participation. The notice shall be prepared and distributed by the applicant, but shall be approved by the Secretary prior to distribution.

A proposed Plan for Public Notice is included with the Recertification Application.

(4) The notice must also include the Agency's address.

A proposed Plan for Public Notice is included with the Recertification Application.

(5) For the purposes of this section, the term "adjoining residences and landowners" shall include those residences and landowners residing on land adjacent to the facility applied for, notwithstanding the presence of a road, railroad, other right of way or a watercourse located on the boundary of the parcel of land on which the facility is located.

A proposed Plan for Public Notice is included with the Recertification Application.

§6-308 Recertification:

(a) A facility may be recertified upon following all application requirements according to the provisions of the latest certification and these rules.

The application package submitted has been prepared in accordance with the Vermont Solid Waste Rules.

(b) Notwithstanding subsection (a) above, a person may apply for re-certification of a facility in accordance with the following:

(1) Upon review of the information currently on file with the Agency, the person shall identify in writing what information required under §6-304 of these rules is on file in the Agency and will not be resubmitted because there has been no change since the last certification application; and

Information already on file with the Agency that we are requesting be utilized has been identified within the body of this correspondence.

(2) *The person submits all documentation reflecting a change in the design, management or operation of the facility, including but not limited to information that must be updated according to §§6-304(e)(6), (10), (11), and (14) of these rules.*

The application package contains updated information for the above referenced Sections.

If you have any questions or concerns, please contact me at 802.236.5973.

Sincerely,

NEW ENGLAND WASTE SERVICES OF VERMONT, INC.

J. Gay

John Gay. E.I.
Permitting, Compliance, and Engineering

c. Town of Coventry
District #7 Environmental Board
Lenny Wing, NEWSVT

New England Waste Services of Vermont, Inc.,
Operating Landfill
Facility Recertification Index

Application Form

Agency of Natural Resources

Department of Environmental Conservation

Waste Management & Prevention Division

1 National Life Drive, Davis 1

Montpelier, VT 05620-3704

Telephone: (802) 828-1138

FACILITY RECERTIFICATION

APPLICATION FORM

1. Facility, Facility Owner, Operator, and Contact Person Information

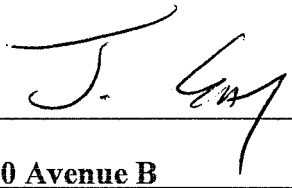
A. Facility Name: **New England Waste Services of Vermont, Inc**

Facility Address: **21 Landfill Lane**

Coventry, Vermont 05825

Telephone: **(802) 334-8300**

B. Facility Owner: **New England Waste Services of Vermont, Inc**

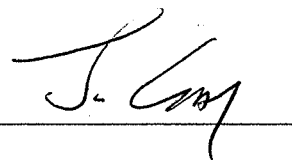
Signature: 

Mailing Address: **220 Avenue B**

Williston, VT 05495

Telephone: **(802) 651-5454**

C. Facility Operator: **New England Waste Services of Vermont, Inc**

Signature: 

Facility Address: **21 Landfill Lane**

Coventry, Vermont 05825

Telephone: **(802) 334-8300**

D. Primary Contact Person: **John Gay**

Mailing Address: **220 Avenue B**

Williston, VT 05495

Telephone: **(802) 651-5454**

E. Secondary Contact Person (optional): **Leonard Wing**

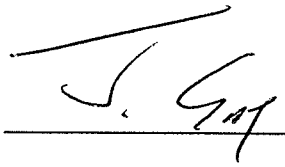
Mailing Address: **21 Landfill Lane**

Coventry, Vermont 05825

Telephone: **(802) 793-3141**

2. Person who prepared the application

Name: **John Gay**

Signature: 

Mailing Address: **220 Avenue B**

Williston, VT 05495

Telephone: **(802) 651-5454**

3. Landownership

a) If you own the property on which the facility is located, indicate the Book and Page where the deed is recorded: Book_____ Page _____. Attach a copy of the deed to the application. A copy of the deed was submitted with the previous application for certification ___X___. (Please check)

A copy of the property deed is enclosed in Section 3 of the application. There are no changes to date.

b) If the landowner has granted to you an unencumbered right to possession of the property to be used for the facility, attach a statement from the landowner. A statement from the

landowner was submitted with the previous application for certification. N/A (please check)

c) If you lease the property to be used for the facility, the landowner must sign below.

Landowner: _____

Signature: _____

Mailing Address: _____

Telephone: _____

4. Recertification

List the information required under 6-304 of the Rules that will not be re-submitted because there has been no change since the last certification application.

1) Copies of Property Deeds, as there has been no changes since the last certification.
2) Siting Criteria Information, as there has been no change since the last certification.

5. Facility Location

Please specify the latitude and longitude for the facility using a Global Position System (GPS) receiver. Alternatively, you may attach a copy of the appropriate Vermont orthophoto tax map with the location of the facility clearly and accurately marked.

(GPS) Latitude **54.39** and Longitude **72.12.32** .

6. List the Operational Units at this facility.

Include all solid waste activities that are anticipated at this facility over the term of certification.

Continued operation of Solid Waste Disposal Facility (Landfill)

Residential drop-off for solid waste and recyclable materials

Staging area for approved HHW Events with CEG collection

Post closure maintenance/monitoring of closed landfill (aka ~ Areas A & B)

7. Days and Hours of Facility Operation

Days: **See Facility Management Plan** Hours: _____

8. Types and Amount of Materials Handled at the Facility

A. Materials to be Transferred for Disposal or Incineration

1. Growth Capacity. This is the amount of solid waste which the facility can technically manage, on an annual basis, over the term of certification. List the amounts in tons. For tires list the number of tires. For Asbestos list the amount in cubic yards.

Material Type	Annual Amount Accepted	Maximum Amount Accepted per day	Maximum Amount Stored on Site
Household/commercial garbage	**600,000 tons***	**not applicable**	**not applicable**
C & D wastes	***included**	**not applicable**	**not applicable**
Bulky Waste, e.g. Furniture	***included**	**not applicable**	**not applicable**
Tires	**not applicable**	**not applicable**	**not applicable**
Asbestos	***included**	**not applicable**	**not applicable**
Untreated wood	***included**	**not applicable**	**not applicable**
Bricks/Mortar/Concrete	***included**	**not applicable**	**not applicable**
HHW/CEG	**not applicable**	**not applicable**	**not applicable**

2. Operating Capacity. List the amounts in tons. For tires list the number of tires. For Asbestos list the amount in cubic yards.

Material Type	Annual Amount Accepted	Maximum Amount Accepted per day	Maximum Amount Stored on Site
Household/commercial garbage	**250,000 tons***	**5,000 tons***	**not applicable**
C & D wastes	***included**	***included**	**not applicable**

Bulky Waste, e.g. Furniture	***included**	***included**	**not applicable**
Tires	**25 tons**	***included**	**800 units**
Asbestos	***included**	***included**	**not applicable**
Untreated wood	***included**	***included**	**not applicable**
Bricks/Mortar/Concrete	***included**	***included**	**not applicable**
HHW/CEG	**not applicable**	**not applicable**	**not applicable**

*** Household/Commercial garbage includes MSW, C&D, bulky waste and sludges.**

B. Recyclable Material to be Accepted

There will be no limit on the amount of recyclables collected at this facility.

9. Notifications

A. Conditionally Exempt Generator (CEG) Regulated Waste Notification

1. CEG Regulated Waste will be accepted at this facility. I have filed a Notification of Regulated Waste Activity Form on **3/24/2009**. (Indicate the date filed)
2. I have filed an up-dated Notification of Regulated Waste Activity Form due to changes in waste type, waste amount, or owner or facility contact information on _. (Indicate the date filed)

B. Used Oil Collection Facility Notification

Used Oil will be accepted at this facility. I have filed a Notification of Regulated Waste Activity Form on

11-21-00 (Indicate the date filed)

10. Liquid Collection and Treatment

Leachate will be disposed in the **See Facility Management Plan** Wastewater Treatment Facility located in ___(City/Town), _ (State). For facilities located in Vermont, I have contacted the Wastewater Management Division concerning the need for a permit or other authorization needed on _____. (Indicate date)

11. Application Fee Submitted with the Application

$ **187,500 (250,000*0.75) annually b 4/1.**

12. Certification of Compliance with the Rules

All applications must be prepared under the direction of a professional engineer licensed in the State of Vermont. The engineer must certify that the application is in compliance with all applicable standards contained or referenced in the Rules. The Secretary may waive this requirement upon request by the applicant. The waiver request must be included as an attachment with this application. If a P.E. waiver is requested, the applicant must certify that the application is in compliance with all applicable standards or referenced in the Rules.

A. Professional Engineer Certification

"To the best of my information, knowledge, and belief, the Phase IV Recertification Drawings prepared by SHA (consisting of 12 Sheets and a Cover Page dated March 2009) included with this application are in compliance with all applicable standards contained or referenced in the Vermont Solid Waste Management Rules (eff. 1/12/2006)."

Engineer Signature: _____ License No. _____ Date: _____

B. Applicant Certification

To the best of my information, knowledge, and belief this application is in compliance with all applicable standards contained or referenced in the Vermont Solid Waste Management Rules (eff. 1/15/99).

Applicant Signature: _____ Date: 8/1/14

13. Application Documents

The following documents and information must be submitted with this form as part of the application:

Included N/A

☐ ☒ Property deed: Copy attached or if submitted with a previous application so indicated on his form.

☐ ☒ Unencumbered Right to Possession of Property: A statement from the landowner conveying to you an unencumbered right to possession of the property to be used for the facility or if submitted with a previous application so indicated on this form.

- ☐ ☒ Completed Categorical Certification Application Forms for Recycling, Composting or Disposal Operational Units as appropriate
- ☐ ☒ Description of Exempt Composting Activity, if appropriate
- ☐ ☒ Orthophoto Tax Map: If appropriate, a copy which clearly shows the property to be used for the facility
- ☐ ☒ Application Fee $ **187,500 (250,000*0.75) annually b 4/1.**
- ☒ ☐ P.E. Waiver: If appropriate, a request for a waiver from the requirement for a P.E. to prepare the application
- ☒ ☐ Plan for Public Notice of the Application
- ☒ ☐ Notice to Municipality: Information which demonstrates compliance with the requirements of 10 V.S.A. §6605(f)
- ☒ ☐ Planning Requirements: Information which demonstrates compliance with the planning requirements of 10 V.S.A. §6605(c)
- ☐ ☒ Siting Requirements: Information which demonstrates compliance with the siting requirements of Subchapter 5 of the Rules
- ☒ ☐ Facility Management Plan which complies with the requirements of §6-1202 of the Rules
- ☒ ☐ P.E. Waiver: If appropriate, a request for a waiver from the requirement for a P.E. to prepare the facility management plan
- ☒ ☐ Facility site and engineering plans
- ☒ ☐ Facility closure plan and closure cost estimates
- ☒ ☐ Plan for financial responsibility or financial capability

Planning Unit Conformance

VIII. SOLID WASTE MANAGEMENT

Municipal Solid Waste Plans

Vermont statute [24 V.S.A. subsection 2202(a)] requires that all municipalities, either individually, or through a solid waste management district or inter-municipal association, adopt a Solid Waste Implementation Plan (SWIP) that conforms with the State Solid Waste Management Plan (2001 Plan Update). The Waste Management Division of the Agency of Natural Resources offers a Guidance Document/Template that is intended to help towns, districts, and associations to assemble a plan. The Guidance Document may be requested from the Waste Management Division by calling (802) 241-3888, or may be downloaded from the Agency's website: http://www.anr.state.vt.us/dec/wmd.htm.

Although mandated solid waste plans mean that municipalities still have the primary statutory responsibilities for solid waste management, the private sector has increasingly taken on a majority of collection, transport, processing, and disposal services required in the state. The State Solid Waste Management Plan holds the Agency of Natural Resources, municipalities, and the private sector responsible for maintaining environmental protection and economic competitiveness. Each should also initiate and play a role in educating the public about waste reduction.

Solid waste services are provided for 34 towns by the Northeast Kingdom Waste Management District (NEKWMD). Walden and Hardwick are part of the Central Vermont Solid Waste Management District, while Craftsbury is a member of the Lamoille Regional Solid Waste Management District. Seventeen towns have approved their own individual plans for solid waste, and are not members of a Waste Management District (See Map 9, page 56).

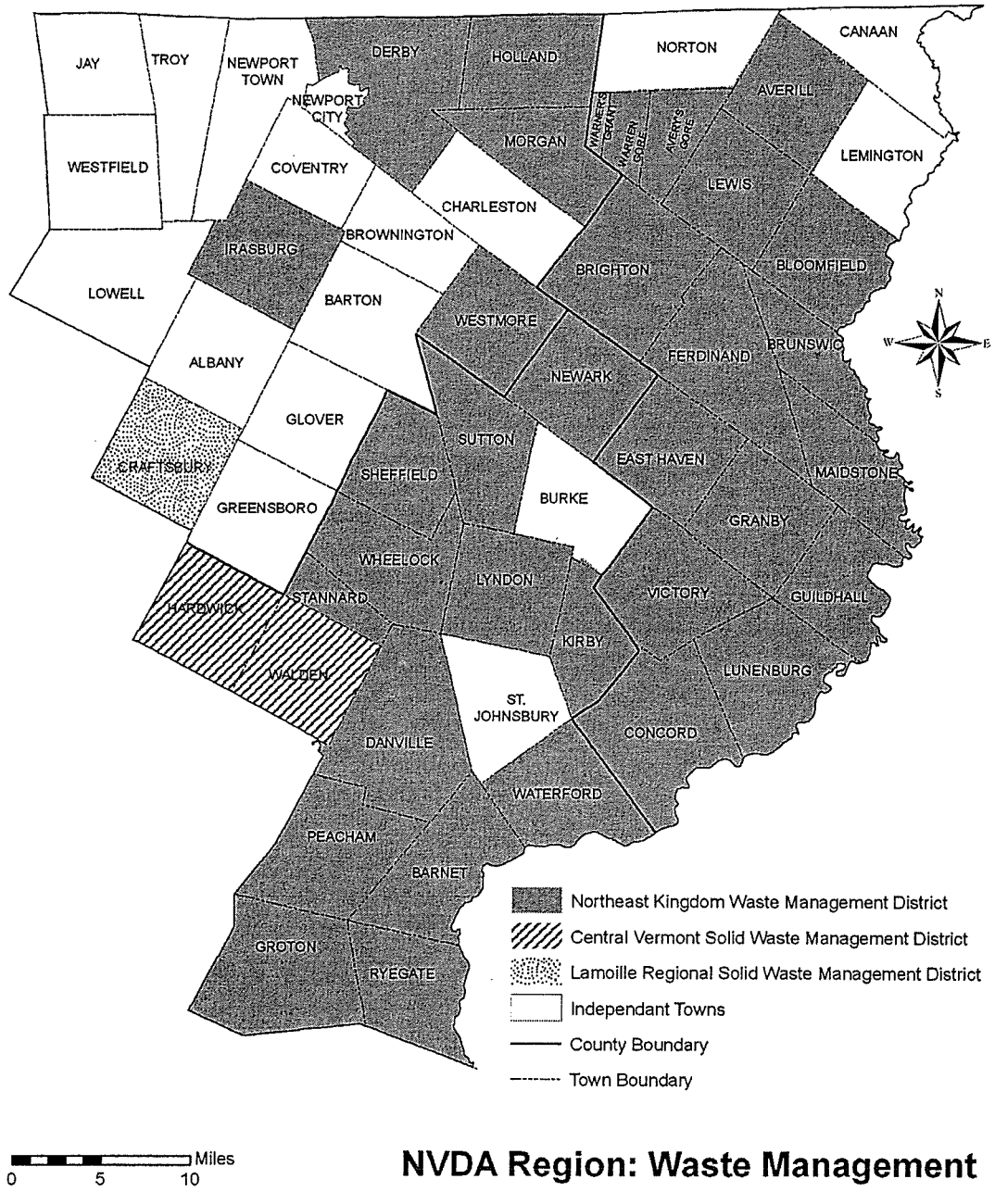
Landfills

As of 2004, the only permitted landfill within the region is located in Coventry. This is a lined facility, privately owned and operated by Waste USA, a subsidiary of New England Waste Services of Vermont. Waste USA estimates that approximately one-half of the solid waste generated in Vermont goes to the landfill in Coventry. This makes the region a net importer of municipal solid waste. The useful life of the Coventry landfill (in its present configuration) at its current rate of fill (240,000 tons per year) is approximately five to seven years. Waste USA is presently in the process of permitting for another cell. They also expect the Coventry landfill to remain in operation for another 20 years. In addition to the landfill services that Waste USA provides, they also provide recycling services (including tires and metals), composting, and have plans for a generating facility that will convert methane gas into electricity.

Act 78, sometimes referred to as the Solid Waste Act, challenged Vermont communities to develop management plans to increase source and waste reduction, reuse, recycling, and decrease the disposal of solid wastes. The highest priority was placed on source and waste reduction, something that has not been successful. The Act did result in the closure of a number of older, unlined landfills and requires greater planning by local officials when siting new facilities. Landfills in Lyndon, Concord, Waterford, and Brighton were closed prior to

1989 and are exempt from post closure monitoring requirements. Landfills in Barnet, Morgan, and Westmore were closed after 1989 and are subject to the post closure monitoring requirements.

MAP 9:



Some former waste disposal sites within the region also remain on the federal EPA's list of Superfund sites. These include: Darling Hill Dump (Lyndonville), Derby Line Dump, Fairbanks Morse Foundry (St. Johnsbury), Nadeau Landfill (Coventry), Parker Sanitary Landfill (Lyndon), and St. Johnsbury Dump. These sites require continued monitoring as existing or potential sources of groundwater pollution.

Transfer Stations and Recycling

There are several waste transfer stations and recycling collection centers within the region. Waste transfer stations allow municipal wastes to be collected locally for transport to the regional landfills. Local transfer stations that collect recyclables help to reduce the amount of waste going to the regional landfill, thus lengthening its useful life. This is important because the siting of new landfills can certainly be quite controversial. Recycling has become more important to many communities and lets individuals play a direct role in protecting the environment.

To a large degree, waste collection (and handling) services within the region are carried out by private sector companies. This is in line with a nationwide trend and aids in reducing the amount of municipal funds required for solid waste management. The Northeast Kingdom Waste Management District requires that all waste haulers conducting business in the District first register, and then report to the district on a monthly basis.

The Northeast Kingdom Waste Management District has a variety of recycling and composting programs, to carry on the function of the former NEK Recycling Cooperative. Recyclables within the NEK Waste Management District are collected at the various transfer stations and transferred to the Lyndonville facility for processing and bundling. They are then sold to brokers who ship the recyclables to their end destinations for final processing (usually in ME, CT, or Canada).

Hazardous and Radioactive Wastes

The sub-categories of hazardous wastes include Household Hazardous Wastes, Industrial Wastes, and Radioactive Wastes (low-level and high-level). Household Hazardous Wastes (HHW) are the most prevalent of all hazardous wastes generated within the region. Despite their availability and relative ease-of-use for residential and commercial sources, the toxins in many of these products can pose serious health and environmental hazards (oil, batteries, cleaning solvents, insecticides, fluorescent bulbs, etc.). Therefore, the proper disposal of wastes, empty containers, and the unused portions of products is essential. The Northeast Kingdom Waste Management District periodically collects HHW for shipping and disposal. Some towns also have oil and battery collection facilities.

Low-level radioactive wastes are generated within the region. Typically, low-level wastes come from hospitals, medical, and research institutions. Low-level radioactive wastes generated in Vermont are disposed of in Texas under a radioactive waste disposal compact. High-level radioactive wastes are not directly generated in the Northeast Kingdom. As consumers of nuclear power, the region is partially responsible for wastes generated through the Vermont

Yankee nuclear plant in southern Vermont. However, until a decision is made regarding a future long-term storage facility in Nevada, the high-level wastes will remain on-site.

Solid Waste Management Initiatives

- Unit based pricing (for non-recyclables). The pay per bag (or, pay as you throw) system is an effective way to reduce the amount of waste generated and increase the amount of waste recycled. The built-in economic incentive allows customers to pay less as they dispose of less.
- Reuse/Recycling Programs. These have proven to be economically successful and popular in most communities. Establishing re-use zones at local transfer stations (residents drop of unwanted usable items and others can take them for reuse) has worked in some areas. Some communities continue to charge fees for resident to recycle. Recycling fees may actually be a disincentive for getting residents to recycle.
- Grants for education. Education grants are available to establish curriculum guides for waste management and recycling education, and to promote in-school recycling and composting.

VIII. SOLID WASTE MANAGEMENT GOALS

- Municipal and regional solid waste disposal systems should be cost-effective, environmentally sound, and promote reduction, reuse, and recycling.
- Hazardous wastes should be disposed of at secure, environmentally sound disposal sites.

STRATEGIES

- Promote recycling, re-use, and waste reduction efforts throughout the region.
- Support public education to promote proper waste disposal efforts.
- Assist municipalities to adopt illegal dumping and burning ordinances.
- Encourage communities to meet the waste management and recycling goals established by the Northeast Kingdom Waste Management District and municipal waste management plans.
- Encourage communities to create or expand local recycling facilities.
- Encourage communities to eliminate or clean up illegal dump sites and Brownfields in the region.

TOWN OF COVENTRY

MUNICIPAL PLAN

ADOPTED BY THE

TOWN OF COVENTRY

BOARD OF SELECTMEN

ON JULY 8, 2013

This copy of the Coventry Town Plan
was adopted by the Coventry Selectboard.

b. Water and Sewer

With the exception of Coventry Village, residents of Coventry do not connect to community water system. Most of the homes, farms, and businesses in the community develop their own water supplies, using surface, or artesian wells. Most of the homes and businesses located in Coventry Village are serviced by a system owned and maintained by the Coventry Fire District. This system includes: a gravel packed well, a pump rated at 65 gpm, a chemical/control room; a 100,000 gallon concrete storage reservoir; and a number of 2", 4" and 6" transmission lines and distribution mains. The system serves homes along Town roads 7, 36, and 54. Due in part to scattered development trends and the adverse economic impact, Coventry has no current plans to develop a town wide water system. This water system must be monitored to insure that it is being properly maintained and, when necessary, major improvements are implemented. Doing so will insure the quality of the water being distributed to the homes in the Village and project the health of the Village's residents. A wellhead protection plan(s) for the community water supply and reservoir are recommended.

Coventry does not provide a public sewage system. Almost all homes, farms and businesses located in the town, are dependent on septic systems for sewage disposal. The town relies on VT Dept. of Environmental Conservation for enforcement of on-site septic systems and potable water supplies in the community, and the illegal dumping of sewage into rivers and streams. . Coventry has no current plans to develop a town wide sewer system

c. Solid Waste Disposal

The Town of Coventry is the host town to a regional disposal facility that is owned and operated by New England Waste Services of Vermont, Inc. The landfill is located on Airport Road just north of the Newport State Airport. The current landfill operating area is a state-of-the-art double lined landfill with leachate collection. The site is permitted and regulated as a solid waste facility by the Vermont Agency of Natural Resources. This site was the only privately owned landfill facility in operation in northern Vermont when the Coventry Selectmen adopted a 20-year Solid Waste Implementation Plan in 1992.

The Plan establishes Coventry as the host town for a certified landfill facility operated by New England Waste Services of Vermont, Inc. Coventry has entered into a Host Community Agreement with the landfill where the Town receives a fee for each ton of waste disposed at the facility. This offers Coventry's residents several benefits for material disposal. These "tipping fees" are currently providing the Town with sufficient revenues to cover Town operating expenses, thus alleviating the need for a municipal property tax.

B. Facilities

a. School

In 1995 the Town of Coventry completed a new school building to replace the two overcrowded buildings located next to the Community Center. The design capacity of the current building is 180 to 200 students and the enrollment during the 2009 - 2010 school year was 117.

Plan For Public Notice

NOTICE OF RE-CERTIFICATION APPLICATION
New England Waste Services of Vermont, Inc. operating landfill

TO: Property Owners adjacent to the New England Waste Services of Vermont, Inc. Operating Landfill, Municipalities, and Permitting Agencies

FROM: New England Waste Services of Vermont, Inc. operating landfill

DATE: June 15, 2014

SUBJECT: Re-Certification Application (Application)

New England Waste Services of Vermont, Inc. is seeking a Re-Certification of our operating landfill located at 21 Landfill Lane in Coventry, Vermont. Under Vermont law, notice of the Application must be given to adjacent property owners of the facility, municipalities, and permitting agencies. The notice as it will appear in the September XX, 2014 editions of the Newport Daily Express and the Courier is re4ferenced below:

NOTICE OF RE-CERTIFICATION APPLICATION

Vermont Agency of Natural Resources
Department of Environmental Conservation
Waste Management & Prevention Program

NOTICE OF RE-CERTIFICATION APPLICATION
New England Waste Services of Vermont, Inc.

Public Notice is hereby provided that the Waste Management & Prevention Program (WMP) of the Agency of Natural Resources has received an administratively complete Re-Certification Application (Application) from New England Waste Services of Vermont, Inc. for continued operation of a solid waste disposal facility located at 21 Landfill lane in Coventry, Vermont. The WMP has prepared a Draft Certification based on the documents provided by NEWSVT for the Re-Certification Application.

This Notice of Application has a public comment period lasting fourteen (14) days from the date of the latest newspaper publication. Based on this duration and the publication dates, the public comment period ends on _____. At the conclusion of the comment period a final Certification will be issued without convening a public informational meeting; unless a written request for said meeting and extension of the public comment period, signed by 25 residents of the municipality wherein the facility is located, is received by the Secretary within the 14 day public comment period.

The Application is available for review at the Coventry Town Clerk's Office and at the WMP office at 1 National Life Drive – Davis 1, Montpelier, Vermont, between 8:00 a.m. and 4:30 p.m., Monday through Friday.

Comments regarding the application and written requests to be placed on the mailing list should be directed to:

Jeff Bourdeau (jeff.bourdeau@state.vt.us)
Waste Management & Prevention Program
1 National Life Drive – Davis 1
Montpelier, Vermont 05620-3704
Phone: (802) 522-0131

NOTICE OF RE-CERTIFICATION APPLICATION

Vermont Agency of Natural Resources
Department of Environmental Conservation
Waste Management & Prevention Program

NOTICE OF RE-CERTIFICATION APPLICATION
New England Waste Services of Vermont, Inc.

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Jeff Bourdeau (jeff.bourdeau@state.vt.us)
Waste Management & Prevention Program
1 National Life Drive – Davis 1
Montpelier, Vermont 05620-3704
Phone: (802) 522-0131

CERTIFICATE OF SERVICE

New England Waste Services of Vermont, Inc. sent a copy of the attached Public Notice Correspondence, via United States Mail, postage prepaid to the following:

Deane Mosher Jr.
Charles Mosher
112 Elm Street
Madison, Wisconsin 53726

John V. & Ann G. Watson
518 Lawson Ridge
Newport, Vermont 05855

Dale & Brenda Perron
428 Lawson Ridge
Newport, Vermont 05855

Eve Mishou
417 Lawson Ridge
Newport, Vermont 05855

Robert & Valerie Gosselin
223 Lawson Ridge Road
Newport, Vermont 05855

Wendell & Nancy Lawson
605 Alderbrook Road
Newport, Vermont 05855

David & Janice Urie
38 Maple Ridge
Newport, Vermont 05855

Linda Gosselin
Danny J. Gosselin, Sr.
Edward Gosselin
262 Lawson Ridge Road
Newport, Vermont 05855

Tammy Dodge-Jacobs
P.O. Box 458
Derby, Vermont 05829

Karen & Thomas Ulrich
203 Maple Ridge
Newport, Vermont 05855

Michael Rushford
Patricia Lynch
146 Maple Ridge
Newport, Vermont 05855

Kathy Cota
27 Lawson Ridge
Newport, Vermont 05855

Bruce & Lora Chesney
232 Maple Ridge
Newport, Vermont 05855

Lorna Young
William Sanville
853 Alderbrook Road
Newport, Vermont 05855

Lincoln W. & Jo-Ann A. Brooks
194 Main Street Suite C
Newport, Vermont 05855

Barry & Anita Allen
Wesley & Schuyler Allen
267 Maple Ridge
Newport, Vermont 05855

Alta Brooks
Corey Brooks
P. O. Box 102
Newport, Vermont 05855

Andre Laramee
471 Maple Ridge
Newport, Vermont 05855

Gerald & Linda St. Sauveur
Gina & Jodi St. Sauveur
500 Maple Ridge
Newport, Vermont 05855

Donald Bennett
Laurie Desautels
389 Spencer Hill
Newport, Vermont 05855

Thomas & Wilma Boulanger
1115 Alderbrook Road
Newport, Vermont 05855

Seth & Rachel DiSanto
579 Maple Ridge
Newport, Vermont 05855

Edward & Gertrude Darby
617 Maple Ridge
Newport, Vermont 05855

CERTIFICATE OF SERVICE

New England Waste Services of Vermont, Inc. sent a copy of the attached Public Notice Correspondence, via United States Mail, postage prepaid to the following:

Ross & Louise Larivee
678 Maple Ridge
Newport, Vermont 05855

Marcel & Mary Maclure
1301 Alderbrook Road
Newport, Vermont 05855

James & Sarah Moulton
P.O. Box 431
Newport, Vermont 05855

William Sanville
Lorna Young
190 Alderbrook Road
Newport, Vermont 05855

Ransom & Doris Mead
P.O. Box 202
Newport Center, Vermont 05857-0202

Mitchell & Edith Durocher
1381 Alderbrook Road
Newport, Vermont 05855

Brian & Brenda Kuper
830 Maple Ridge
Newport, Vermont 05855

Joseph & Rosemarie Roy
723 Maple Ridge
Newport, Vermont 05855

Karin I. Musso
P.O. Box 542
Newport, Vermont 05855

Matthew G. Curran
825 Maple Ridge
Newport, Vermont 05855

Hazen & Alice Wright
919 Maple Ridge
Newport, Vermont 05855

Aaron & Bobbi-Jo Waterman
1589 Nelson Hill Road
Derby, Vermont 05829

Keith & Marvelene Richards
1060 Maple Ridge
Newport, Vermont 05855

Lynn & Robert Fortunati
1071 Maple Ridge
Newport, Vermont 05855

Stephen & Roberta Hurd
1162 Maple Ridge
Newport, Vermont 05855

Corey & Rene Fortin
1179 Maple Ridge
Newport, Vermont 05855

State of Vermont
c/o Dept. of Fish & Wildlife
1 National Life Drive, Davis 2
Montpelier, Vermont 05620-3702

Jacques & Madeline Dalpe
592 West Street
Derby, Vermont 05829

Raymond Rodrique
48 Natural Hill
Newport, Vermont 05855

Rosalind Landers
15 N. Desmond Drive
E. Wakefield, New Hampshire 03830

Pike Industries Inc.
Attn: James Manley
249 Granger Road
Barre, Vermont 05441

John Wheeler
Eileen Catalano
155 Natural Hill
Newport, Vermont 05855

Irene & Clifford Messier
223 Nadeau Park Road
Newport, Vermont 05855

Lyle & Amy Gray
554 Nadeau Park Road
Newport, Vermont 05855

CERTIFICATE OF SERVICE

New England Waste Services of Vermont, Inc. sent a copy of the attached Public Notice Correspondence, via United States Mail, postage prepaid to the following:

Larry Bowman
35 Natural Hill
Newport, Vermont 05855

Neal & Tammy Horgan
413 Nadeau Park Road
Newport, Vermont 05855

Charles & Myrna Nadeau
153 Nadeau Park Road
Newport, Vermont 05855

Daniel Introcaso
P.O. Box 109
Coventry, Vermont 05825

Paul Introcaso
P.O. Box 109
Coventry, Vermont 05825

City of Newport
222 Main Street
Newport, Vermont 05855

Charles & Virginia Drown
P.O. Box 38
Newport Center, Vermont 05857

Bruce Hamilton
386 Hancock Hill
Newport, Vermont 05855

State of Vermont
c/o Newport Airport
2628 Airport Road
Newport, Vermont 05855

Ann & Joseph Cote
2614 Airport Road
Newport, Vermont 05855

James Cobb
Mary Kay Fletcher
380 Heermanville Road
Irasburg, Vermont 05845

Neighborhood Equities, LLC
3112 Airport Road
Newport, Vermont 05855

Daniel Gauvin
2260 Airport Road
Newport, Vermont 05855

Dan & Kim Wood
194 Laramee Road
Newport, Vermont 05855

Daniel & Elisabeth Parker Prue
427 Laramee Road
Newport, Vermont 05855

Colin & Yvette Parker
108 Billings Point Road
Newport, Vermont 05855

Leslie Joseph
P.O. Box 332
Newport, Vermont 05855

David & Lynda Mosher et al.
4 Green Mountain Drive
St. Albans, Vermont 05478

Keith Parker
108 Billings Point Road
Newport, Vermont 05855

Jesse Diner
Adele Stone
10762 Hawkins Vista Street
Plantation, Florida 33324

David LaFluer
P.O. Box 84
Lyndon, Vermont 05849

Jared & Sharon W. Gonyaw
179 Northern Avenue
Newport, Vermont 05855

Bernie Jr. & Claudette Gonyaw
442 Billings Point
Newport, Vermont 05855

Trevor & Corrie Poor
22 Myers Court
S. Burlington, Vermont 05403-6409

CERTIFICATE OF SERVICE

New England Waste Services of Vermont, Inc. sent a copy of the attached Public Notice Correspondence, via United States Mail, postage prepaid to the following:

John & Ann Parker
11 Hamilton Drive
Kerhonkson, New York 12446

James & Marguerite Coffey
P.O. Box 343
New Ipswich, New Hampshire 03071

Ronald & Faye Demski
2 New Road
Avon, Connecticut 06001-3107

K. Colin & J. Leslie Parker
Helen Parker Callen
260 Billings Point
Newport, Vermont 05855

James & Theresa Gamache
6 Alder Lane
Burlington, Vermont 05401

Charles Nadeau
153 Nadeau Park Road
Newport, Vermont 05855

James Morse
P.O. Box 903
Derby, Vermont 05829

Scott & Melissa Souliere
72 Hunt Hill Road
Brownington, Vermont 05860

Northeast Vermont Sheet Metal
33 Airport Road
Newport, Vermont 05855

Daniel & Alicia Larose
1349 Coventry Street
Newport, Vermont 05855

Town of Coventry
P.O. Box 104
Coventry, Vermont 05825

Northeastern Vermont Development Assoc.
P.O. Box 630
St. Johnsbury, Vermont 05819

District #7 Environmental Commission
1229 Portland Street, Suite 201
St. Johnsbury, Vermont 05819-2209

Dated:

_____

John Gay, E.I
Engineer
New England Waste Services of Vermont, Inc.
220 Avenue B
Williston, VT 05495

NOTIFICATION LIST
Re-Certification Application
New England Waste Services of Vermont, Inc.
Coventry, Vermont

Landowners							
Property Owner ID Number	Parcel ID Number	Name #1	Name #2	Address	City	State	Zip Code
1	138018	Deane Mosher Jr.	Charles Mosher	112 Elm Street	Madison	WI	53726
2	0570518	John V. & Ann G. Watson		518 Lawson Ridge	Newport	VT	05855
3	0570428	Dale & Brenda Perron		428 Lawson Ridge	Newport	VT	05855
4	0570417	Eve Mishou		417 Lawson Ridge	Newport	VT	05855
5	0570223	Robert & Valerie Gosselin		223 Lawson Ridge Road	Newport	VT	05855
6	0040605	Wendell & Nancy Lawson		605 Alderbrook Road	Newport	VT	05855
7	0580038	David & Janice Urie		38 Maple Ridge	Newport	VT	05855
8	0570304	Linda Gosselin	Danny J. Gosselin, Sr./Edward Gosselin	262 Lawson Ridge	Newport	VT	05855
9	0580057	Tammy Dodge-Jacobs		P.O. Box 458	Derby	VT	05829
10	0580203	Karen & Thomas Ulrich		203 Maple Ridge	Newport	VT	05855
11	0580146	Michael Rushford	Patricia Lynch	146 Maple Ridge	Newport	VT	05855
12	0570027	Kathy Cota		27 Lawson Ridge	Newport	VT	05855
13	0580232	Bruce & Lora Chesney		232 Maple Ridge	Newport	VT	05855
14	0040853	Lorna Young	William Sanville	853 Alderbrook Road	Newport	VT	05855
15	0580396	Lincoln W. & Jo-Ann A. Brooks		194 Main Street Suite C	Newport	VT	05855
16	0580267	Barry & Anita Allen	Wesley & Schuyler Allen	267 Maple Ridge	Newport	VT	05855
17	0580397	Alta Brooks	Corey Brooks	P. O. Box 102	Newport	VT	05855
18	0580471	Andre Laramee		471 Maple Ridge	Newport	VT	05855
19	0580500	Gerald & Linda St. Sauveur	Gina & Jodi St. Sauveur	500 Maple Ridge	Newport	VT	05855
20	0041015	Donald Bennett	Laurie Desautels	389 Spencer Hill	Newport	VT	05855
21	0041115	Thomas & Wilma Boulanger		1115 Alderbrook Road	Newport	VT	05855
22	0580533	Seth & Rachel DiSanto		579 Maple Ridge	Newport	VT	05855
23	0580617	Edward & Gertrude Darby		617 Maple Ridge	Newport	VT	05855
24	0580678	Ross & Louise Larivee		678 Maple Ridge	Newport	VT	05855
25	0041301	Marcel & Mary Maclure		1301 Alderbrook Road	Newport	VT	05855
26	0041177	James & Sarah Moulton		P.O. Box 431	Newport	VT	05855
27	0041158	William Sanville	Lorna Young	190 Alderbrook Road	Newport	VT	05855
28	0041295	Ransom & Doris Mead		P.O. Box 202	Newport Center	VT	05857-0202
29	0041381	Mitchell & Edith Durocher		1381 Alderbrook Road	Newport	VT	05855
30	0580830	Brian & Brenda Kuper		830 Maple Ridge	Newport	VT	05855
31	0580723	Joseph & Rosemarie Roy		723 Maple Ridge	Newport	VT	05855
32	0580763	Karin I. Musso		P.O. Box 542	Newport	VT	05855
33	0580825	Matthew G. Curran		825 Maple Ridge	Newport	VT	05855
34	0580919	Hazen & Alice Wright		919 Maple Ridge	Newport	VT	05855
35	0580993	Aaron & Bobbi-Jo Waterman		1589 Nelson Hill Road	Derby	VT	05829
36	0581060	Keith & Marvelene Richards		1060 Maple Ridge	Newport	VT	05855

NOTIF[illegible]ION LIST
Re-Certification Application
New England Waste Services of Vermont, Inc.
Coventry, Vermont

Landowners							
Property Owner ID Number	Parcel ID Number	Name #1	Name #2	Address	City	State	Zip Code
37	0581071	Lynn & Robert Fortunati		1071 Maple Ridge	Newport	VT	05855
38	0581162	Stephen & Roberta Hurd		1162 Maple Ridge	Newport	VT	05855
39	0581165	Corey & Rene Fortin		1179 Maple Ridge	Newport	VT	05855
40	6000200	State of Vermont	c/o Dept. of Fish & Wildlife	1 National Life Drive, Davis 2	Montpelier	VT	05620-3702
41	5003371	Jacques & Madeline Dalpe		592 West Street	Derby	VT	05829
42	3040048	Raymond Rodrique		48 Natural Hill	Newport	VT	05855
43	3040261	Rosalind Landers		15 N. Desmond Drive	East Wakefield	NH	03830
44	0042001	Pike Industries Inc.	Attn: James Manley	249 Granger Road	Barre	VT	05441
45	3040155	John Wheeler	Eileen Catalano	155 Natural Hill	Newport	VT	05855
46	3040097	Irene & Clifford Messier		223 Nadeau Park Road	Newport	VT	05855
47	0150554	Lyle & Amy Gray		554 Nadeau Park Road	Newport	VT	05855
48	3040035	Larry Bowman		35 Natural Hill	Newport	VT	05855
49	0150413	Neal & Tammy Horgan		413 Nadeau Park Road	Newport	VT	05855
50	0150153	Charles & Myrna Nadeau		153 Nadeau Park Road	Newport	VT	05855
51	0150498	Charles & Myrna Nadeau		153 Nadeau Park Road	Newport	VT	05855
52	5002871	Daniel Introcaso		P.O. Box 109	Coventry	VT	05825
53	0150450	Paul Introcaso		P.O. Box 109	Coventry	VT	05825
54	0150452	City of Newport		222 Main Street	Newport	VT	05855
55	1401906	Charles & Virginia Drown		P.O. Box 38	Newport Center	VT	05857
56	5002397	Bruce Hamilton		386 Hancock Hill	Newport	VT	05855
57	0170001	State of Vermont	c/o Newport Airport	2628 Airport Road	Newport	VT	05855
58	0022614	Ann & Joseph Cote		2614 Airport Road	Newport	VT	05855
59	0022719	James Cobb	Mary Kay Fletcher	380 Heermanville Road	Irasburg	VT	05845
60	0270213	Neighborhood Equities, LLC		3112 Airport Road	Newport	VT	05855
61	0022486	Daniel Gauvin		2260 Airport Road	Newport	VT	05855
62	0180194	Dan & Kim Wood		194 Laramee Road	Newport	VT	05855
63	0180300	Daniel & Elisabeth Parker Prue		427 Laramee Road	Newport	VT	05855
64	0180400	Colin & Yvette Parker		108 Billings Point Road	Newport	VT	05855
65	0021407	Leslie Joseph		P.O. Box 332	Newport	VT	05855
66	149008	David & Lynda Mosher et al.		4 Green Mountain Drive	St. Albans	VT	05478
67	0100143	Colin & Yvette Parker		108 Billings Point Road	Newport	VT	05855
68	146003	Keith Parker		108 Billings Point Road	Newport	VT	05855
69	146002	Jesse Diner	Adele Stone	10762 Hawkins Vista Street	Plantation	FL	33324
70	144007	David LaFluer		P.O. Box 84	Lyndon	VT	05849
71	144006	Jared & Sharon W. Gonyaw		179 Northern Avenue	Newport	VT	05855
72	144005	Bernie & Claudette Gonyaw Jr.		442 Billings Point	Newport	VT	05855

NOTIFICATION LIST
Re-Certification Application
New England Waste Services of Vermont, Inc.
Coventry, Vermont

Landowners							
Property Owner ID Number	Parcel ID Number	Name #1	Name #2	Address	City	State	Zip Code
73	144004	Trevor & Corrie Poor		22 Myers CT	South Burlington	VT	05403-6409
74	144003	John & Ann Parker		11 Hamilton Drive	Kerhonkson	NY	12446
75	144002	James & Marguerite Coffey		P.O. Box 343	New Ipswich	NH	03071
76	144001	Ronald & Faye Demski		2 New Road	Avon	CT	06001-3107
77	146001	K. Colin & J. Leslie Parker	Helen Parker Callen	260 Billings Point	Newport	VT	05855
78	6000400	State of Vermont	c/o Dept. of Fish & Wildlife	1 National Life Drive, Davis 2	Montpelier	VT	05620-3702
79	0020534	James & Theresa Gamache		6 Alder Lane	Burlington	VT	05401
80	6000300	State of Vermont	c/o Dept. of Fish & Wildlife	1 National Life Drive, Davis 2	Montpelier	VT	05620-3702
81	5004602	Charles Nadeau		153 Nadeau Park Road	Newport	VT	05855
82	5004851	Charles & Myrna Nadeau		153 Nadeau Park Road	Newport	VT	05855
83	5004856	James Morse		P.O. Box 903	Derby	VT	05829
84	0020082	Scott & Melissa Souliere		72 Hunt Hill Road	Brownington	VT	05860
85	0020174	Charles Nadeau		153 Nadeau Park Road	Newport	VT	05855
86	144009	State of Vermont	c/o Dept. of Fish & Wildlife	1 National Life Drive, Davis 2	Montpelier	VT	05620-3702
87	145001	Northeast Vermont Sheet Metal		33 Airport Road	Newport	VT	05855
88	138001	Daniel & Alicia Larose		1349 Coventry Street	Newport	VT	05855

Municipalities and Other Agencies				
Name	Address	City	State	Zip Code
Town of Coventry	P.O. Box 104	Coventry	VT	05825
Northeastern Vermont Development Association	P.O. Box 630	Saint Johnsbury	VT	05819
District #7 Environmental Commission	1229 Portland Street, Suite 201	Saint Johnsbury	VT	05819-2209

Facility Management Plan

NEW ENGLAND WASTE SERVICES OF VERMONT, INC

LANDFILL FACILITY

21 Landfill Lane
Coventry, Vermont 05825

FACILITY MANAGEMENT PLAN

August 4, 2014

Prepared By:

New England Waste Services of Vermont, Inc.
Permits, Compliance & Engineering
220 Avenue B
Williston, Vermont 05456

FACILITY MANAGEMENT PLAN

INDEX

EXHIBITS

FACILITY MANAGEMENT PLAN

This Facility Management Plan provides information for site staff to become familiar with to properly manage the NEWSVT (New England Waste Services of Vermont, Inc.) lined landfill facility located at 21 Landfill Lane in Coventry, Vermont. The facility is owned and operated by NEWSVT whose parent company is Casella Waste Systems, Inc. located at 25 Greens Hill Lane, Rutland, Vermont, 05701.

1.0 FACILITY IDENTIFICATION, SERVICE AREA, AND ANTICIPATED SITE LIFE

The NEWSVT lined landfill is located at 21 Landfill Lane in the Town of Coventry, Vermont.

The Facility mailing address is:

New England Waste Services of Vermont, Inc.
P.O. Box 348
Newport, VT 05855
Phone: (802) 334-8300 – Fax: (802) 334-2476

The Facility physical address is:

New England Waste Services of Vermont, Inc.
21 Landfill Lane
Coventry, VT 05825

The current disposal is designed and constructed in accordance with the Vermont Agency of Natural Resources, Solid Waste Management Division Rules (eff; March 15, 2012).

2.0 ACCEPTABLE & UNACCEPTABLE WASTE TYPES

2.1 ACCEPTABLE MATERIALS AND ANTICIPATED TONNAGE

Recyclable materials and solid wastes which may be accepted at the facility (*landfill or the residential recycling drop-off station*) may include:

- Solid Waste for disposal – Municipal solid waste generated by residents. Non hazardous, solid waste from commercial, mining, agricultural or industrial sources.

- Zero Sort® recycling at drop off - Includes #1-7 plastics, cardboard, boxboard, paper, newspaper, magazines, paper bags, paper back books, glass bottles & jars all colors, aluminum cans, metal cans, empty aerosol cans.

- White goods at drop off or removed from waste stream - Include discarded stoves, washers, dryers, refrigerators, microwave ovens, dishwashers. White good appliances are prohibited from disposal in the landfill.

- Scrap Metal at drop off or removed from the waste stream – Discarded metal objects.

- Tires at drop off or removed from the waste stream.

- Non-Friable Asbestos for disposal - Handling requirements for Non-Friable Asbestos waste are presented in Exhibit A.

- Wastewater treatment plant sludge for disposal – Must be non hazardous and consist of at least 12 percent solids and pass the Paint Filter Test may be accepted (Paint Filter Tests are not required for sludge with percent solids of greater than 20 percent).

- Special solid wastes for disposal which are not hazardous have been approved by NEWSVT through its Special Waste approval program.

- Treated containerized medical waste for disposal - That has received a "Certification of Treatment". The landfill must receive prior notification and agreed upon a delivery date with the client. The "Certification of Treatment" shall accompany the load and the load shall be placed and covered immediately in the landfill.

- Organic Waste materials at drop off

These wastes may be accepted at a rate not to exceed 5,000 tons per day. The waste is also restricted to an annual acceptance of 250,000 tons per year, however, with an approved administrative amendment to the operating certification the facility could accept up to 600,000 tons per year.

2.2 UNACCEPTABLE WASTES

Unacceptable wastes include but are not limited to the following:

- Those wastes prohibited by local, state (6-701(g)), and federal law;

- VTANR Non-Implemented Waste;

- Hazardous wastes (as defined by the federal and Vermont Hazardous Waste Rules);

- Regulated (untreated) Medical Waste unless specifically approved by the SWMP;

- Landfill Banned Items consistent with 10 V.S.A. 6621a including;
  - ✓ Lead Acid Batteries,
  - ✓ Waste Oil,
  - ✓ White Goods,
  - ✓ Tires,
  - ✓ Paint (Water and Oil Base), Paint Thinner, Paint remover, Stains and Varnishes – Note: Water based paint solidified in a container one gallon or less is acceptable for disposal),
  - ✓ Nickel Cadmium Batteries, small sealed lead acid batteries, non consumer mercuric oxide batteries,
  - ✓ Labeled mercury-added consumer products,
  - ✓ Electronic Wastes
  - ✓ Fluorescent Light Bulbs
  - ✓ Food scrap for large producers (> 104 tons/year – or 2 tons/week) if no outlet exists within 20 miles of source.

- Liquid wastes (that is waste containing free liquids as defined by Method 9095 (Paint Filter Liquids Test as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" [EPA Pub. No. SW-846]);

- Contained gaseous wastes;

- Non-approved special wastes;

- Source separated marketable recyclables;

- Waste containerized liquids (with the exception of household soda, beer, coffee, etc);

- Empty liquid waste containers greater than 30 gallons unless they are cleaned prior to disposal;

- Friable Asbestos (greater than 10 yards without prior approval);

- Yard waste at the working face area (yard waste is accepted at the residential drop off area).

As indicated above, regulated hazardous waste will not be accepted at the facility. NEWSVT hosts two household hazardous waste and Conditionally Exempt Small Quantity Generator drop-off days for area towns and area businesses respectively.

3.0 ROUTINE OPERATIONS

3.1 HOURS OF OPERATION

The Facility may accept waste (Gate Hours) for disposal from 6:00 a.m. to 5:00 p.m. Monday through Friday, 6:30 a.m. to 4:00 p.m. on Saturday. The facility may be closed on Sundays and holidays. The facility may modify the gate days/hours of operation at its discretion as long as it is within the days times referenced above.

Routine landfill operational tasks such as inspections, meetings, maintenance, repairs, monitoring, sampling, and the application of daily cover may be conducted between the hours of 5:00 a.m. and 6:00 p.m., Monday to Saturday.

During special events, the facility operating hours may be unlimited with prior written approval from the Vermont Agency of Natural Resources.

3.2 ACCESS CONTROL

Access to the facility will be restricted by gates located along any access on Airport Road. Natural barriers preclude access along the south, west and north sides of the property. A sign or signs will be posted at the scale entrance area indicating:

1. The facility name;
2. The name, address, and telephone number of the permittee;
3. The hours of operation;
4. A list of Prohibited wastes.

The main entrance gate will be closed after the posted gate hours. An automated gate allows vehicles from inside the facility to exit the facility beyond gate hours.

3.3 TRAFFIC PATTERNS

Once into the site, waste hauling vehicles proceed along the landfill roadways until they arrive at the entrance point to the actual disposal area of the landfill.

As development proceeds, signs may be placed along the access road to indicate where hauling vehicles should travel.

Trucks entering the site in the early a.m. hours and prior to the landfill officially being open for the day may enter the facility and park where they will wait for the facility to open. Scale attendants either in direct discussions with haulers or through two-way radio's will communicate with the drivers.

3.4 METHOD FOR TRACKING WASTE QUANTITIES (SCALE TICKETS)

All waste hauling vehicles entering the site are weighed on a certified scale. All drivers are required to sign a statement indicating that no hazardous wastes are present on their truck. Empty waste hauling vehicles check out at the scale house prior to exiting the site and a scale receipt may be given to the driver.

Scale tickets for all loads delivered to the site include: town of origin, state of origin, name of hauler, quantity, and type of waste delivery. Scale tickets will be maintained on site for five years.

3.5 MBI HAULING AND TIPPING OPERATIONS

MBI hauling vehicles require special handling at the landfill because the body of the truck has no mechanism to eject the load. To unload the trailers are tipped off of a hydraulic platform. Once onto the landfill site, MBI vehicles proceed to the de-tarping station. Once the tarp is removed, the truck will then proceed to the working face area to unload. MBI vehicles then back onto the primary tipper and the waste is tipped. After unloading, the MBI vehicles will exit the facility utilizing a predetermined tare weight. A secondary tipper is on standby at the site if the primary tipper malfunctions.

3.6 PHASED DEVELOPMENT

One of the main objectives of the design and development of the disposal facility is to maximize the landfill capacity in the allowable footprint while conforming to regulatory requirements.

Once permitted, the factors on where and how landfill cells are constructed include: capacity needs, development cost, and construction timeframe.

To utilize capacity reestablished by waste settlement, exposed geosynthetic caps may be installed as an interim condition in areas that have been filled to at or near final grade and are not adjacent to future landfill expansion. When the desired settlement is achieved, the interim cap may be removed so that active landfilling operations can reoccur in the cell. This process may be repeated until the rate of settlement no longer justifies the reinstallation of an interim cap. At that time, a final cap will be installed in accordance with the SWMP approved final cap design.

3.7 STORM WATER MANAGEMENT

Stormwater management practices will be conducted in accordance with the Multi-Sector General Stormwater Permit, Construction General Permit and the Stormwater Discharge Permit.

Temporary rain covers (tarps, synthetic membranes, etc.) used to divert clean run-off from within the lined area may be utilized when appropriate. Any stormwater run-off diverted beyond the lined footprint of the landfill will be managed by the existing stormwater management system around the landfill (detention ponds, rip-rap swales, stone check dams, grass lined swales, etc.).

3.8 FILLING PROCEDURES

The filling procedures described below will be typically followed during disposal of solid waste. Special handling procedures may be necessary during the disposal of certain special wastes.

INITIAL LIFTS OVER THE LINER - To limit the potential for damage to the liner system by landfill equipment or bulky wastes an initial **five-foot lift** of select refuse will be placed over the sand drainage layer. Care will be taken during the initial five-foot lift placement to remove items from the waste stream that could be pushed through the sand and into the liner system and a spotter may be present during placement of the initial five-foot lift and will remove any unacceptable items. The second lift of refuse above the fluff lift will be kept back a minimum of five feet from the top outer edge of the fluff lift so inspection can confirm that potentially damaging objects have been removed.

TYPICAL LIFTS - Following placement of the initial lift, fill placement will proceed in successive compacted layers. It is noted that actual day-to-day operations are left to the discretion of the Site or General Manager.

3.9 DAILY, INTERMEDIATE COVER & ROAD BASE MATERIALS

Daily cover consisting of six inches of soil or an approved ADC (alternate daily cover) material will be applied to the working face at the conclusion of each working day. ADC may consist of geotextile, tarps, or spray-on foams and have been used successfully at landfill sites throughout the country. ADC will be used only after gaining approval from the SWMP.

Twelve inches of intermediate cover soil will be applied in areas where active filling will not occur for a period of twelve months or more. Intermediate cover soil will be seeded and mulched as soon as practical.

Ground, chipped and crushed wood, processed glass and discarded asphalt, brick and concrete can be used as beneficial use road bed material at this facility. Processing of any of the discarded material shall take place within the landfill footprint and not on areas that have received the final landfill cap. A copy of the current ADC & BUD materials can be found in Exhibit B.

3.10 WINTER OPERATIONS

Snow will be plowed using conventional plowing methods. Roadways will be sanded or salted accordingly to make access safe. The landfill management reserves the right to close the landfill in severe weather elements.

3.11 PERSONNEL AND EQUIPMENT

The following table will be used as a guideline:	Operations at 1,500 tons per day (avg.)	Operations at 2,500 tons per day (avg.)	Operations at 3,500 tons per day (avg.)	Operations at 5,000 tons per day (avg.)
On Site Staffing				
General Manager	1	1	1	1
Operations Supervisor	1	1	1	1
Environmental Technician	1	1	1	1
Mechanic	1	1	2	3
Heavy Equipment Operator	5	6	7	8
Scale Operator	1	1	2	2
Laborer	1	1	2	3
On Site Equipment				
Front-end Loader	1	1	1	2
Articulated Pay Hauler	2	3	3	4
Waste Compactor	2	2	3	4
Excavator	2	2	2	2
Dozer	3	3	3	4
Site Truck (1 Ton)	1	1	2	2
Water Truck	1	1	1	1
Bobcat	1	1	1	1
Fuel Truck	1	1	1	1

Note: Each number represented in the "On Site Staffing" section reflects the number of personnel that would be on site each operating day; unless otherwise noted. The "On Site Equipment" section represents the amount of equipment expected to be necessary to manage the respective tonnage each day.

Other Key personnel are as follows:

Region Engineer - 1-(802) 236-5973
Region Safety Manager: 1- (207) 862-4200

NEWSVT will provide training to employees that is necessary to educate the person to properly perform the duties of his/her position.
At least one person on site will have OSHA 40-hour Hazardous Waste Operations and Emergency Response training.
Equipment maintenance, or replacement is a common occurrence and back up equipment is always available if necessary. Routine equipment maintenance will be performed as necessary to keep the equipment in good operating condition.

3.12 ACCIDENT PREVENTION AND SAFETY

NEWSVT has a safety and accident prevention program. As part of this program, employees will be trained in proper operating and emergency procedures. Telephone and radio communication and first aid equipment is provided at on-site facilities as well as on-site equipment. Regular safety meetings will be held at the facility.

3.13 BIRD CONTROL

NEWSVT contracts with the United States Department of Agriculture (USDA) to reduce the bird population at and around the facility. Please refer to Exhibit C for a copy of the Bird Control Plan. Four to five days a week (or as necessary) a member of the USDA is on site and performs dispersal techniques such as shot crackers and whistlers (bottle-rockets), depredation, inflatable predators. NEWSVT staff performs the above referenced techniques when and if the USDA is not on site.

3.14 ODOR CONTROL

The application of daily cover in conjunction with the existing active gas management should provide effective odor control. Waste arriving at the site with abnormal indication of odors will be placed and covered immediately. Currently, the facility actively extracts from drilled wells, horizontal wells and hybrid vertical/horizontal wells, leachate cleanout pipes and sideriser pump casing piping. These collection devices are continuously installed at the site when necessary.

Odor control will also be a consideration during waste inspections to be conducted at the site. If waste streams are identified with unacceptably high odors, the generator will be informed and required to take the necessary measures to reduce the odor.

3.15 DUST CONTROL

Dust control procedures will include proper maintenance of vegetated areas, gravel and paved service roads. This maintenance will include reseeding areas where lack of vegetating is causing dust.

Dust will be controlled on the access road by the application of water and/or calcium chloride. Road sweeping may also be performed to reduce fugitive dust.

3.16 WIND-BLOWN LITTER

Blowing litter will be minimized by limiting the active working face and using daily cover over the active fill areas. Litter fence has been installed in areas where necessary. Other methods, such as the utilization of litter pickers and portable fencing, will be employed as required to contain loose paper and other wind-blown litter during the fill operations.

At the discretion of the landfill management, the landfill may close on days with extremely high winds. In those cases, the SWMP would be notified.

The facility currently collects litter along both sides of Airport Road from the Laramee Road to the intersection of Airport Road and Route 5. Litter collection also occurs one mile south and one mile north on Route 5 from the intersection of Airport Road. For safety reasons, litter collection will occur as weather conditions allow.

All refuse hauling trucks are required to have their loads securely tarped or use closed containers/truck bodies. The site manager will be responsible to assure litter control efforts are sufficient.

3.17 VECTOR CONTROL

Mammals or insects carrying potential pathogens from within the landfill to a place outside the landfill (Vectors) are controlled by the use approved daily covers to minimize or eliminate such concern.

If at any time any mammal or insect is determined to be carrying potential pathogens from within the landfill to a place outside the landfill, control techniques will be employed. This could be the installation of fencing, scare tactics, enclosed bait stations in the case of mammals and the services of a professional exterminator in the case of insects.

The USDA also assists the site with vector control techniques.

4.0 WASTE INSPECTION

Waste Inspection is intended to ensure that to the extent practicable only acceptable wastes are disposed at this facility.

Random load inspections will occur on a weekly basis to monitor for unauthorized waste (see Exhibit D for random load inspection forms). In addition, compactor operators routinely visually observe the waste as the vehicles discharge their load onto the working face. As refuse is spread at the working face, operators observe for unacceptable materials.

Once vehicles are in the disposal area a waste hauler is selected at random and is generally directed to the edge of the current disposal area. The waste is off loaded and observed by the inspector as it is in the unloading process and again after it has completely emptied from the truck body. The inspectors shall not handle any waste and shall observe the contents and complete the random load inspection form. The procedure outlined below shall be followed if a prohibited waste is found in the load.

When an unacceptable waste stream is discovered, the procedure outlined below will be followed:

1. An unacceptable waste which is deposited on the working face and which does not appear to be an immediate threat to health or safety will be isolated. The customer will be identified, and the customer will asked to remove the waste.

   If a customer or hauler cannot be identified, NEWSVT personnel will collect and store items within a mobile storage bin placed in the lined footprint. This bin will serve as a point to consolidate un-acceptable wastes that have been collected from within the lined landfill. The bin will be taken periodically to the locations where items are collected for temporary storage, placed into the appropriate container. The empty bin would then go back into the lined landfill.
2. In the event a waste disposed on the working face is believed to present an immediate threat to health and safety (e.g., reactive chemicals, ruptured drums containing liquids), it will be left in place undisturbed. The State of Vermont "Hazardous Substance Spill" or "Emergency Management Office" will be contacted at ***1-(800)-641-5005*** and ***1-(800)-347-0488*** respectively.

5.0 LEACHATE MANAGEMENT

The leachate collection systems consist of double liner systems with primary leachate and secondary detection collection systems. The leachate collection pumping and handling systems were designed so that head buildup over the liner floor is less than one foot under routine operating conditions. In the event of rainfall generated from a twenty five year, twenty four hour storm event, the facility has up to 5 days to restore the build up over the liner to one foot or less.

5.1 PUMPING/REMOVAL SCHEDULE

Leachate and leak detection liquids will be automatically pumped from collection sumps. The primary pump controls will activate the pump when leachate has reached a level approximately corresponding to the primary HDPE base liner elevation adjacent to the sump or less. Liquid will be pumped from the secondary collection sumps when the liquid level is at an elevation corresponding to the secondary liner grade adjacent to the sump. Primary leachate and secondary detection liquids will be pumped directly from the sumps up sideslope riser pipes through a HDPE force main to the side slope riser buildings. Primary leachate and secondary detection liquids are metered and can be sampled in these buildings that also serve as a point for pump access and replacement. The leachate then continues out of the building through dual contained HDPE pipes to double-walled storage tanks.

In the event that storage tanks are full, the controls will automatically shut off the pumps and an alarm indication is sent to the landfill office at the site during normal business hours and to an answering service after normal hours. The answering service has a list of contacts to call so that someone will respond to address the situation at the site.

Leachate is then hauled to one of the permitted facilities listed below:

FACILITY
Montpelier, Vermont WWTF
Essex Junction, Vermont WWTF
City of Barre, Vermont WWTF
Burlington North, Vermont WWTF
Concord, New Hampshire WWTF
Plattsburgh, New York WPCP
City of Newport, Vermont WWTF

5.2 UNDER GROUND LEACHATE STORAGE TANKS (UST'S)

Any underground double walled leachate storage tanks will be tested on a monthly basis. The tanks will be tested by dropping a dipstick into the tank interstitial monitor portal or monitor a vacuum pressure gauge to confirm that the interstitial space is dry (see Exhibit E for a copy of the inspection form). The table below illustrates the number of UST's at the site:

UST Tank Size	Date Installed	Location	Date of Interstitial Inspection
20,000	Fall 2001	West of the Phase III Cell 2 sideslope riser building	Year of 2011

If a tank is inspected and liquid is detected within the monitoring portal, a sample will be drawn and field tested for Temperature, pH, Specific Conductivity and for visual appearance. If it can be reasonably assumed from these measurements that the liquid is leachate then the leachate will be removed immediately to a tanker truck or adjacent storage tank. All pumps contributing leachate to the tank shall be shut off and a contractor shall be hired to

inspect the inside of the tank and shall be done as quickly as practical. Any repairs will be completed and a static water test will be performed before the tank is put back into use.
If a tank is inspected and liquid within the monitoring portal does not appear to resemble leachate and/or match the level within the tank then the liquid will be removed using a hand held suction/siphon device. The tank interstitial space will then be monitored daily; if the level does not rise a test applying 2 pounds per square inch of vacuum will be performed to confirm the integrity of the outer tank and will then be placed back into service if the test passes. If the vacuum test fails, the tank will be exposed or removed for repairs.
Any UST must be visually inspected every 10 years to check the condition of the coating material. If defective, repairs will be made.

5.3 ABOVE GROUND LEACHATE STORAGE TANKS (AST'S)

On-site AST's (above ground leachate storage tanks) shall be inspected at least once monthly from the outside of the tank. If a leak is found, any tank volume would be reduced to below the leak level and the manufacturer would be called for immediate repairs. The site currently has one 480,000 gallon AST that was installed in 2005.
In order to prevent leachate being stored on the liner, the level of leachate inside the tank shall be kept at or below 67% of its capacity. If the level is above 67% for 3 consecutive days, the Vermont Agency of Natural Resources will be notified within 24 hours. A concentrated effort to reduce the level to below 67% storage capacity will be made. Leachate will be taken to one or more of the approved Wastewater Treatment Facilities listed in Section 5.1 of this document.

5.4 LEACHATE CONTINGENCY CONSIDERATIONS

If a leak occurred inside a side slope riser building, secondary containment is provided by a sealed concrete floor with a twelve inch curbing. A building flood switch is located inside the building and monitors the floor for accumulation of leachate which could result from a leak in a pipe; this switch would turn off all contributing pumps to the building. In most cases spare pumps and certain types of valves and fittings are available at the site for replacement. Otherwise, replacement parts are typically twenty four to forty eight hours from delivery.
In the event of an extended power outage an end-suction centrifugal pump may be used to remove the leachate off the liner in Phases I and II. In Phase III and IV, a generator can be utilized to provide interim power to operate the pumps.

Secondary Detection System 20 g/a/d Exceedance

The Secondary Detection Systems at this facility are measured each day for flow rates. The following table outlines the actions to be taken if rates reach certain levels within any individual cell:

g/a/d (Gallons per Acre per Day)	ACTION
0 – 20	Monitor Daily
20 – 100	Inspect the non conforming cell for signs of stormwater infiltration particularly around the perimeter of the cell, develop a graphical representation of rainfall versus flowrates for the 30 days prior to the exceedance and until the rates fall to below action levels. Sample both the Primary and Secondary Systems for: Field (pH, Temperature and Specific Conductance); Laboratory Analysis for (COD, BOD, Total Sodium, Total Chloride, Arsenic, Cadmium, Chromium, Copper, Iron, Lead, Manganese, Mercury, Nickel, Zinc VOC's (EPA 8260) and SVOC's (EPA 8270). Submit Report the SWMP summarizing the above referenced findings.
> 100	Notify the SWMP within 48 Hours. Perform all the tasks in the 20 - 100 g/a/d cell above. Submit a preliminary assessment within 14 days. If no reasonable explanation can be determined, present a Remedial Action Plan the SWMP for consideration within 30 days of the initial notification.

5.5 RECORD KEEPING AND MONITORING

The facility will maintain records for each load of leachate shipped, identifying the quantity of leachate shipped, the date shipped, and the name of the wastewater treatment facility receiving the leachate.

Facility permits, construction as-built drawings, inspection reports and this Facility Management Plan will be kept at the site. Some compliance functions and recordkeeping are managed off site.

6.0 RESIDENTIAL DROP-OFF

Areas will be designated on-site for collection of metals, white goods, waste oil, and tires. NiCad batteries will be stored in one of two plastic tubs located under cover.

NEWSVT will provide roll-offs at the facility for recycling and solid waste.

Items collected in the recycling containers will be trucked to off-site recycling centers. White goods (with certified CFC removal labels confirming that all CFC's have been removed from the unit) and scrap metals will be collected in a roll-off container. Whenever a container is full, it will be transported off-site for recycling.

Tires will be placed into 3 to 4 roll-off boxes then relocated into a transfer trailer for transportation off site.

Leaf, Yard and Woody waste will be accepted at the drop off site and either composted or used as BUD road bed.

7.0 FACILITY MAINTENANCE, INSPECTION, AND MONITORING

Service roads will be graded or swept when necessary and maintained in a serviceable condition at all times. The scales, scale house and office, and the maintenance building will be maintained as required.

A Facility Inspection Form (see Exhibit F) will be completed once a week. For items that are identified as requiring attention, inspectors will complete the section available on the inspection form for comments and/or proposed action. All outstanding items will be resolved as soon as practicable.

Upon completion of the inspection, the landfill operations manager will review the report as necessary or as soon as practicable.

Any Solid Waste Certification non-compliant situation shall be reported by NEWSVT staff consistent with:

SWMR-6-703(b) – "The operator shall submit a report to the Secretary within five (5) working days of the receipt of any information indicating non-compliance with any term or condition of certification or other operating authority.", and

SWMR-6-703(c) – "Any discharge or emission from a facility which poses a threat to public health and safety, a threat to the environment or the creation of the nuisance must be reported within twenty-four (24) hours to the State of Vermont Department of Environmental Conservation, the local health officer, and the selectpersons of the affected municipalities. A written report shall be submitted to the parties to whom the event was reported within seven (7) days of the discharge or emission. The report shall identify the discharge or emission that occurred, the type, quantity, and quality of waste, and the actions taken to correct the problem.

8.0 UNDERDRAINS

There are four underdrain discharge location points. One each for Phases I-IV, these underdrains are designed to allow free gravity flow discharge unless conditions detailed below in the Underdrain Contingency section are experienced. Each underdrain will be sampled within the first full business week of each month and each sample will be analyzed for Temperature, Specific Conductance, pH, and estimated flow volume.

Each underdrain outlet may be cleaned annually.

8.1 UNDERDRAIN CONTINGENCY

Purpose: This contingency plan presents the steps that would be taken if the Vermont Water Quality Standards are exceeded at any of the underdrain discharge points at the NEWSVT landfill facility in Coventry, Vermont.

Monthly field measurements: During the first business week of each month, NEWSVT personnel measure four parameters (pH, electrical conductivity, temperature, and flow rate) and make visual observations at each underdrain discharge point.

Semi-Annual laboratory analyses: During May and October of each year, water samples are

collected from each underdrain discharge point. Field measurements of pH, electrical conductivity and temperature are performed, and lab analyses are performed for numerous inorganic parameters and volatile organic parameters. These results are reported to ANR within 60 days of sampling.

Contingency Plan Triggers: The actions described below would begin if one or both of the following trigger values are exceeded in the monthly field parameter measurements, in any one of the four underdrain discharges:

1. Electrical conductivity: exceeds 2,000 micro-mhos;
2. pH: less than 6.0 standard pH units (s.u.), or greater than 9.5 s.u.

Actions to be taken if a trigger is met:

A. NEWSVT personnel will immediately (before the close of the same working day) notify qualified water quality professionals.

B. Within two working days, a qualified representative will collect a second round of field measurements with different field equipment, to check the initial measurements.

C. During the time as the step above, the same qualified water quality professionals will measure the same field parameters at the surface water station down-gradient of the triggering underdrain (SW-7 or SW-8), and at the Black River upstream and downstream stations (SW-1 and SW-2).

6. In this same two-day time period, NEWSVT personnel will confirm the proper functioning of the leachate pumping mechanisms, and review the generation rates of the secondary leachate collection systems.

7. By the end of the working day in which the second round of field measurements are taken, NEWSVT will report the results of Steps #2, #3 and #4 to the Solid Waste Division of ANR, and to the qualified water quality professionals.

Actions to be taken if the second round of field measurements confirms that a trigger has been met:

A. Before the end of the day in which notification is made in Step #5 above, NEWSVT will cap the discharge pipe and pump the groundwater from within the pipe to a double walled leachate holding tank or a leachate tanker. The discharge pipe will have a provision to allow a flange to be bolted onto the pipe and seal its discharge and have a provision to pump the liquid. This would divert its discharge from the Black River wetland complex to containment for eventual transportation to a wastewater treatment facility;

B. NEWSVT will continue with field measurements once a week, beginning one week after the second round of field measurements, until results have dropped below trigger values, or until resolution has been achieved. Measurements will be taken from the triggering underdrain, and in the surface water station down-gradient of the triggering underdrain (SW-7 or SW-8), and at the Black River upstream and downstream stations (SW-1 and SW-2). NEWSVT will report these field results to ANR and a qualified water quality professional by the end of the same day as the measurements.

C. A qualified water quality professional will collect samples from the triggering underdrain, from SW-7 or SW-8 (whichever is down-gradient), and from both

Black River stations (SW-1 and SW-2), and will promptly deliver the samples to a qualified laboratory for the full suite of analyses that are listed for surface water locations in the current Solid Waste Certification. Laboratory results will be reported to ANR as soon as they are available.

D. NEWSVT will not allow the triggering underdrain to discharge to the ground surface or Black River wetland until permission is granted by ANR. If it is determined that an underdrain discharge can not be allowed to discharge to the Black River wetland complex, it will become a component of the leachate collection system and any discharge pumped and stored into a leachate holding tank and ultimately taken to a permitted wastewater treatment facility.

9.0 LANDFILL GAS TO ENERGY FACILITY (LFGTE)

The facility includes a LFGTE facility that collects, treats and utilizes landfill gas as a fuel to power large internal combustion engines that in turn power generators that produce sufficient energy to support sustainable renewable energy to the electrical distribution system.

The facility actively extracts landfill gas from drilled wells, horizontal wells and hybrid vertical/horizontal wells, leachate cleanout pipes and sideriser pump casing piping from across the landfill. These collection devices are continuously installed at the site when necessary.

The actual combustion devices in the control system are:

- A LFGTE facility with Internal Combustion Caterpillar G3520C Series Engines with 1,600 kW generator units; and
- A 75 million British thermal unit per hour (Btu/hr) John Zink Company, LLC utility flare.
- A 77.8 million British thermal unit per hour (Btu/hr) Parnel Biogas utility flare.

The electricity generated by the LFGTE facility is delivered to the Vermont Electric Power Company (VELCO) grid for distribution to utility customers.

The utility flare is intended for use when the landfill gas (LFG) collection rate exceeds the available engine combustion capacity or when the LFGTE facility is not operating. The control system is configured so that LFG can be combusted in the LFGTE facility, by the flare, or by both simultaneously.

9.1 GAS MONITORING AND CONTROL

NEWSVT or the LFGTE operators adjust the individual wellheads to optimize odor control, gas migration prevention, and gas well production. The wellheads are also carefully monitored to prevent fires from occurring internally within the landfill. The wellfield is monitored as needed and generally once per month.

Monitoring for fugitive landfill gas is conducted monthly at the landfill property line at four gas probe locations; GP-1, GP-2, GP-3, and GP-4 (see attached Environmental Monitoring Point Location Plan, Exhibit H). A portable landfill gas meter is used to monitor for methane, oxygen, and hydrogen sulfide at these locations.

If at any time the concentration of explosive gas exceeds twenty five percent of the lower explosive limits in the landfill perimeter gas probes or facility structures, the landfill operator will:

1. Immediately take all steps necessary to ensure protection of human health and safety.
2. Within 24 hours of detection notify the Solid Waste Management Division (802-241-3444, 8:00 a.m. - 4:30 p.m., M-F), or the Hazardous Materials Emergency Hotline (1-800-641-5005), and in the instance of off-site migration, the affected property owner as well;
3. Within thirty (30) days of detection, submit a remedial action plan for the gas releases to the Agency for approval; and
4. Implement the approved plan in accordance with a compliance schedule established by the Agency.

A handheld explosive gas meter is used to check facility structures once a week.

10.0 GROUNDWATER MONITORING

Permanent groundwater monitoring wells have been installed to monitor groundwater quality at the site. Monitoring wells are provided with a protective casing and a locking cap. Sampling and analyses of groundwater will be performed in accordance with the solid waste certification issued by the SWMP.

11.0 RECORD KEEPING

The following records will be kept at the facility:

- Facility Design Report and Plans (as submitted to the SWMP for Certification);
- Construction as-built drawings;
- This Facility Management Plan;
- Permit Binder;
- Special Waste approvals;
- Asbestos receipts,
- Complaint log,
- Treated Regulated Medical Waste Certifications,
- A daily record will be maintained at the scale house of types of wastes received, weight and hauler identification,
- Leachate loads are weighed and recorded for all outbound loads

12.0 CONTINGENCIES & EMERGENCY PROCEDURES

12.1 SEVERE STORM

In the event of a severe storm, operations staff will evaluate and determine early closure of the facility is warranted.

12.2 FIRE PREVENTION

Fire protection controls on site consist of cover soils and fire extinguishers maintained in the equipment. The Newport Fire Department is located within three miles from the landfill and will be contacted in the event of a fire at the facility.
A representative from The City of Newport Fire Department conducts annual site visits.
Any hot load will be directed to a safe area of the landfill to be monitored.

12.3 POST EARTHQUAKE INSPECTIONS

Should an earthquake occur of sufficient magnitude to potentially cause damage to the leachate collection and storage system, a post earthquake inspection of the system will be performed.
The inspection will include confirming the integrity of the following:

1. The leachate pumps, controls, level indicators, alarms, and discharge piping.
2. The leachate pipe connections, particularly the pipe connections in the side riser building.
3. The leachate storage tank and its visible connections. The tank secondary containment system will be checked by a low pressure air test for underground tanks and by a visual inspection for above ground tanks.
4. The secondary detection system flows will be monitored every twelve hours for a three day period following the earthquake.
5. Any cells with exposed liner will be visually inspected.

12.4 CONTINGENCY TRANSFER STATION

Should the landfill be closed prematurely and unexpectedly, a temporary transfer station will be constructed. The transfer station will consist of an area within the landfill constructed such that waste can be deposited and re-loaded into transfer trailers.

EXHIBIT A

FRIABLE and NON-FRIABLE ASBESTOS WASTE HANDLING PLAN

This plan describes procedures to be implemented for disposal of asbestos containing materials (ACM) at the NEWSVT landfill facility.

Haulers are required to notify the site at least 24 hours in advance of arrival at the facility of their desire to dispose of ACM to inform the facility of the anticipated volume of material proposed to be disposed. This notification will allow facility operating personnel the opportunity to determine that the required paperwork is complete and approved.

Upon entering the site, the hauler is to inform the scale house attendant that the load is asbestos containing material, identify its origin and sign the **FRIABLE and NON-FRIABLE ASBESTOS HANDLING FORM (attached).** The scale house attendant or designated landfill representative will confirm the load and verify that approvals to accept the material are in place prior to acceptance of the material. ACM will be accepted in un-compacted hauling and contained in appropriate sealed bags and labeled asbestos waste containing containers.

Upon arrival at the working face, the hauler will be directed to a selected disposal area. NEWSVT personnel will have a designated area or an excavation prepared to accommodate 100 percent of the volume of ACM. 12" of municipal solid waste or 6" of soil cover will be used to cover the ACM.

The equipment operator will mist the load with water when the temperature is above 40 degrees and observe the load as it is discharged. The operator will remain upwind of the disposal location. The operator will assure that other haul vehicles are kept away from the area until the load is buried.

Tipping of the ACM will be done with care to reduce the potential for puncturing a container. The dumped load will not be compacted, but instead will be covered immediately from the up-wind side with refuse or soil. Daily cover will be placed over the load prior to passing over it with compaction equipment.

The disposal location of asbestos-containing loads must be approximated horizontally and vertically by a pin being placed on a grid map in the landfill office where the load is referenced and an elevation is assumed.

Disposal will not take place within 15 feet of final contour elevations.

NEWSVT

FRIABLE and NON-FRIABLE ASBESTOS HANDLING FORM

1. The asbestos waste hauling container must be visibly labeled with the following description;

"CAUTION
CONTAINS ASBESTOS
AVOID OPENING OR BREAKING SEALED BAGS WITHIN -
BREATHING ASBESTOS IS HARMFUL TO YOUR HEALTH"

2. If a load arrives at the facility without the proper labeling reject the load and provide the hauler with a copy of this form.

3. The asbestos waste must be double bagged or wrapped with 6 mil. Polyethylene bags or; the container must be lined with a double layer of 6 mil. Polyethylene.

4. The load must be misted with water or covered with snow prior to unloading.

5. The double lined asbestos waste bags shall be placed in the lined landfill and within an excavation that will accommodate 100 percent of the volume of asbestos a minimum 12" layer of municipal solid waste and at the end of the day 6" of earthen soil cover. No mounding of the waste is allowed, i.e. the waste must be completely buried within the general waste mass.

6. The asbestos waste material shall be covered immediately with 6" of earthen daily cover or with garbage.

7. If the scale attendants have any questions or concerns with a particular load please call the Landfill General Manager. If any of the above individuals can not be reached and questions or concerns are not addressed, reject the load.

I have read and understand this form; the asbestos waste containing load that I am transporting is consistent with these guidelines.

_____Signature

_____Hauling Company

_____Date

NEWSVT Acknowledgement:_____ Date:_____

EXHIBIT B

NEWSVT List of Approved Alternate Daily Cover Materials and Beneficial Use Determinations

ADC Material	Date Approved
OMYA Tailings	January 2102
Lincoln, NH WWTF Lagoon Sludge	
Husky IM Water Jet Abrasives	June 6, 2002
Car Wash Grit and Street Sweepings	May 2, 2002
ERRCO C&D Fines	October 10, 2000
Soil from Sewer Repair	June 30, 2000
Owens Residence PCS	March 24, 2000
Brooks Pharmacy PCS, Lyndon, VT	February 8 2000
Clay and Wood Fiber/Paper Mill Sludge	November 9, 1998
Sludge 1 part / Soil 5 parts	June 5, 2008
Vermont Castings Foundry Sand	August 6, 1997
Posi-Shell	April 14, 1997
BUD Material	**Date Approved**
OMYA Ceramic Lining Road Base	
Crushed Glass Road Base	March 23, 2001
Sawdust Road Base	November 20, 2000
Ground C&D Road Base	November 14, 1995

EXHIBIT C

BIRD CONTROL PLAN

1.0 INTRODUCTION

This plan has been prepared to describe the procedures to be followed to control the number of birds at the NEWSVT facility so that operations at the facility do not result in an increase in the number of birds, particularly the presence of gulls, visiting the site. This plan identifies personnel responsible to implement the plan, describes the bird control measures and presents the monitoring program to be used to evaluate the effectiveness of the mitigation measures. This plan has been prepared with assistance from Dr. David Capen, Associate Professor of Wildlife Biology; School of Natural Resources, at the University of Vermont. Dr. Capen is familiar with the NEWSVT site having directed the bird monitoring efforts at the facility since 1992.

2.0 OBJECTIVE

The objective of this plan is to prevent birds from foraging at the landfill, thereby controlling the number of birds in the vicinity of the landfill to the population normally sustained in the area. Specifically, the objective is to control the number of gulls and other birds so that they don't exceed the numbers that were present at the site in 1992-1993 when baseline data on the number of birds were first recorded. This objective recognizes that peak numbers of gulls in the fall may reach 400 to 500, but that the vicinity of the Newport State Airport, located about 1 mile to the south of the landfill, is an attractive location for gulls and other birds even without the presence of the landfill. If gulls are prevented from using the landfill for feeding, loafing or resting, the facility cannot be presumed to be creating a situation leading to an increase in the gull population in the vicinity.

3.0 PERSONNEL AND RESPONSIBILITIES

Implementation of this plan will involve a variety of personnel including the Landfill Manager, a Bird Control Officer and other members of landfill staff. A consultant (Dr. Capen at this time) will be retained to conduct the monitoring to evaluate the effectiveness of the measures employed. In addition, all landfill staff will be familiar with the goals and methods presented in this plan. Staff will be made aware that nothing but maximum effectiveness of the bird control measures is acceptable. Specific responsibilities of persons responsible for implementation of this plan are described below.

3.1 Landfill Manager

The Landfill Manager has ultimate responsibility for implementation of the plan. The Manager will meet with staff regularly, periodically review procedures, communicate regularly with corporate environmental engineering staff and coordinate with the consultant as required.

3.2 Bird Control Officer

The Bird Control Officer will be a designated landfill staff member who will devote his/her time on an as needed basis to bird control efforts. If necessary, a staff member whose sole responsibility will be bird control will be hired. The Bird Control Officer or a designated alternate will be on site at all times when the facility is open. The Bird Control Officer should be reachable at all times by radio. Specific duties of the Bird Control Officer include:

- Assuring that equipment is in good working order and that adequate supplies are on site;
- Being responsible for the habitat management and bird dispersal methods being implemented;
- Recording data on bird control efforts and bird responses; and
- Communicating with the Landfill Manager and corporate engineering staff on a routine basis.

3.3 Consultant

Dr. David Capen of the University of Vermont has played an integral part with the development of the existing facility monitoring plan and has been monitoring the site since 1992. NEWSVT will continue to utilize Dr. Capen as the sites consultant. The program in part consists of monitoring the number of birds seen in the vicinity of the landfill, around the airport runways and in fields adjacent to the airport. In addition, the Consultant will be responsible to:

- Provide advice to the Bird Control Officer regarding the implementation of this Plan;
- Evaluate the overall effectiveness of the bird control measures; and
- Make recommendations to modify the Plan as necessary.

4.0 OVERALL BIRD MANAGEMENT STRATEGY

The overall bird management strategy will include a coordinated effort involving habitat management, dispersal techniques, exclusion techniques, and if

necessary, lethal methods. The goal of the coordinated effort is to disrupt the daily pattern of feeding and loafing at the facility. These elements are discussed below.

4.1 Habitat Management

Habitat management is the primary effort in bird control. The effectiveness of the dispersal techniques discussed in Section 4.2 is limited by the attractiveness of the site to birds. All birds found at landfills, but especially gulls, prefer to loaf and wait for fresh waste to be dumped in level open areas where they have unrestricted visibility. Other conditions which attract birds include sources of drinking/bathing water and relatively large open areas devoid of vegetation or with mowed vegetation which provide a secure area for the birds to rest. Effective habitat management will involve:

- Limiting the active area where refuse is deposited to the degree practical;

- Applying adequate daily cover to bury the waste rendering the food source inaccessible to the birds. There is sufficient soil on site for use as daily/intermediate cover. A responsibility of the Bird Control Officer will be to inspect the working face to see that the area is limited and that adequate cover material has been applied;

- Allowing vegetation to become established and maintained at a height of 10 to 12 inches or more over as much of the site as practical to limit areas birds find attractive for loafing. Mowed areas should be limited with mowing of open grassy areas taking place once a year, in the spring when the grass will recover quickly; and

- Assuring that the sedimentation ponds drain as designed after each rainfall event to limit the area of on site surface water where birds could drink or bathe.

Note that the Vermont Agency of Transportation (VAOT) routinely leases the property surrounding the airport to local farmers who uses it for growing corn or hay. Such practices attract birds to feed in these fields whenever there are such activities such as plowing, mowing, or spreading manure. The best management of these fields to discourage gulls would be to encourage the growth of tall grasses or low shrubs. The Landfill Manager will attempt to work with the VAOT to encourage a change in the management of these fields to reduce the potential bird hazard the current use of these fields poses.

4.2 Dispersal Techniques

Dispersal techniques are also a critical element of bird control. The objective of the dispersal techniques is to prevent birds which may still be attracted to the site from landing. Dispersal techniques must be varied so that the birds do not become used to the method being employed so that it loses effectiveness. Techniques which will be used include the use of scare devices, human patrols, gull distress tapes and a scarecrow of a dead gull. These are discussed below.

4.2.1 Scare Devices

Scare devices include shotcrackers or whistlers which are non-lethal noise producing projectiles fired from a gun. Some have a time delay which allows them to travel nearer the gulls before exploding while others whistle as the projectile passes through the air. The Bird Control Officer will maintain a supply of at least three different types of shotcrackers/whistlers on site.

The noise producing projectiles should be used by the Bird Control Officer during daylight hours. The projectiles will be fired when the birds are on the ground or attempting to land. The type of projectile used should be varied so that the birds do not become habituated to the particular device and it loses effectiveness.

4.2.2 Human Patrols

The Bird Control Officer is responsible to patrol the site to observe the effectiveness of the habitat management techniques and to disperse birds. At least two patrols should be conducted each day the landfill is operating, one in the morning and the second in the afternoon. The afternoon patrol should generally be completed at the end of the day to observe that cover soils are placed over the waste and that bird control measures are being effectively employed. Other patrols should be performed as necessary to deter birds from the site. The Bird Control Officer will complete a form documenting observations made on the patrol such as the number of birds noted, the methods used to deter the birds, such as number of projectiles fired, and the response of the birds to the dispersal technique. Improvements to the Habitat Management program or the need for exclusion techniques (discussed in Section 4.3) should be identified during the patrols. The daily patrol records will be maintained at the facility to document the day to day bird control efforts. These observations will supplement observations by the Consultant.

4.2.3 Gull Distress Tapes and Scarecrows

In addition to the use of projectiles, recordings of distressed gulls are available. These will be played from time to time and used in conjunction with shotcrackers and a scarecrow of a dead gull placed in areas where they are visible to birds attempting to land. As with other methods, the tapes should not be played continually and the scarecrows should be moved frequently to maintain their effectiveness.

4.3 Shooting

Lethal methods such as shooting can be employed as permitted by the U. S. Fish and Wildlife Department. This method would not be used as a means of control but would be used to prevent gulls from becoming habituated to other methods such as shotcrackers.

5.0 MONITORING AND REPORTING

The facility will continue a program of monitoring the numbers of birds that are seen in the vicinity of the landfill, around airport runways, and in fields adjacent to the airport. The monitoring program will be conducted under the direction of the Consultant. Monitoring efforts will document and record the following:

- Numbers and species of birds throughout the year near the active landfill and other sites on the NEWSVT property;
- Numbers and species of birds throughout the year in the vicinity of the Newport State Airport and in agricultural fields adjacent to the airport;
- Presence of nesting colonies of gulls on Lake Memphremagog, if they occur;
- Quantitative observations of the potential hazard that gulls and other birds present to aircraft in the area of the landfill and the airport;
- Subjective observations of interchange by gulls and other birds between that landfill site, the airport, and fields near the airport.

Observations will be taken for 15-minute periods, 4-hour sessions, rotating from site to site. Sites will include the active cell of the landfill, the airport, and a third location that varies with season and weather conditions. Sometimes the third site will be a position midway between the airport and landfill, sometimes the fields around the airport, and sometimes sites on NEWSVT property away from the active landfill cell. During summer and early fall months, when gulls are migrating and blackbirds are most numerous, 32 hours of observations will be conducted each month on at least six different days; from two to six visits will be made during other months. Four-hour observation periods will rotate throughout

daylight hours, and include sampling times when the landfill is open as well as times when there is no activity at the landfill.

During May, an aerial survey of the Lake Memphremagog region will be conducted to determine if gulls have begun to nest in the vicinity. At present, there are no nesting colonies.

Monitoring reports will include summaries of bird control activities carried out by the Bird Control Officer so that the effectiveness of control activities can be evaluated and related to numbers of birds observed at different times of the year. The Consultant will prepare quarterly reports that summarize monitoring results and bird control activities for the past quarter. At the end of each calendar year, a summary report for the year will be prepared, and trends in bird numbers will be compared to previous years.

EXHIBIT D

NEW ENGLAND WASTE SERVICES OF VERMONT, INC. LANDFILL

RANDOM LOAD INSPECTION

INSPECTOR/S:_____AFFILIATION:_____

_____ _____

_____ _____

Date _____ Time_____ Hauler ID _____

Ticket # _____ Origin of Waste_____

MSW +/-_____% C&D +/-_____% OTHER +/-_____%

Description of load:

_____

_____

_____

_____

The following table outlines items that are banned, prohibited or unauthorized from the landfill. Upon inspection of the active area please utilize the following table to note materials encountered that are banned, prohibited or unauthorized from the landfill.

MATERIALS PROHIBITED BY VERMONT STATE STATUTE:			
	ITEM OBSERVED	*ITEM REMOVED*	*COMMENTS / HOW WAS WASTE MATERIAL HANDLED?*
Electronic Waste; computer parts, tv's, anything with circuit board, etc			
Waste Oil			
Nicad Batteries			
Labeled mercury-added consumer products			
Non-consumer mercuric oxide batteries			
Lead acid batteries			
oil base paint, paint thinner, paint remover, varnish, stains (except solidified latex paint)			
Tires *(max 3000)*			
White goods *(containerize)*			
Refrigerants collected by qualified person prior to further treatment?			
PROHIBITED BY VTANR SOLID WASTE MANAGEMENT PROCEDURE:			
Liquid Waste (except household)			

Untreated, unincinerated infectious waste			
PROHIBITED BY SOLID WASTE CERTIFICATION OR FACILITY MANAGEMENT PLAN:			
Non-Implemented Waste or Non-Processed Waste			
Contained gaseous wastes Cylinders			
Anti-Freeze containers with quantifiable residual material within.			
Herbicides or Pesticides containers with quantifiable residual material within.			
Computer Components			
Yard Waste			

EXHIBIT E

NEW ENGLAND WASTE SERVICES OF VERMONT, INC. LANDFILL
UST / AST MONTHLY TANK INSPECTION FORM

Name of Inspector(s):_____

Year (Circle one): 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018

Month (Circle one): January February March April May June July August September October November December

Day (Circle one): 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

Landfill Leachate Tanks	UST INTERSTITIAL TANK TEST		AST VISUAL INSPECTION LEAKS: YES or NO
	DIPSTICK WET	DIPSTICK DRY	
PHASE III (TANK 3) UST 20,000 Gallon Double Walled			
CONSOLIDATED AST 550,000 Gallon			

NOTES:

EXHIBIT F

NEWSVT LANDFILL
ROUTINE INSPECTION CHECKLIST

INSPECTORS: DATE:

WEATHER: Today:

Yesterday:

Reason for Inspection (CIRCLE):

Routine Emergency Other

	YES	NO	NA	COMMENTS/ ACTION ITEMS
1. Is the working face limited to as small an area as practical?				
2. Is the waste being spread in two foot layers and adequately compacted?				
3. Have six inches of compacted daily cover material (or approved ADC) been placed over the entire working face?				
4. Have 12 inches of compacted intermediate cover been placed over areas filled to final grade or which will not receive additional fill for 4 months or more? Should this lift be seeded?				
5. Are there any areas completed which require intermediate cover and seeding?				
6. Is the lift graded properly to promote runoff?				
7. Is the lift at the proper height? (8 to 10 ft. normally)				
8. Are all surface water diversion ditches in place and free of sediment or debris?				
9. Are there any blown papers or debris which should be picked up?				

10. Is the landfill access road well graded and/or plowed?

11. Is the access road to the working face in good condition?

12. Have daily records of leachate, waste quantities and quality, cover material, and other applicable measurements been noted?

13. Is there evidence of leachate breakouts?

14. Do the sedimentation basins need to be cleaned?

15. Are there eroded areas that need attention?

16. Is the litter fence properly located & functioning?

17. Are the blower and flare functioning consistently and as expected?

18. Are there odors evident?

19. Are dust control measures needed?

ADDITIONAL COMMENTS:

SIGNATURE

DATE

Copy to Company Compliance and Permitting Office

Closure Plan

CLOSURE PLAN

NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
LANDFILL ACILITY ~ COVENTRY, VERMONT

Re- Certification June 2014

INTRODUCTION

This Closure Plan describes the steps to be undertaken to close the NEWSVT (New England Waste Services of Vermont, Inc.) landfill. This plan has been prepared to address the requirements of Section 6-1002(b) 1-7 of the Vermont Solid Waste Management Rules. Design Plans referenced in this Closure Plan were prepared by SHA (Sanborn, Head & Associates, Inc.).

Phased closure could occur where sections of the landfill are final capped or partially capped. Partial capping would include the installation of the final capping Geomembrane and have it exposed for a period of years. The remaining cover soils would be placed once all settlement is achieved. Final capping would consider the construction of the full closure design system.

1. Description of Steps Necessary to Fully Close the Facility

Closure would involve notifying the public of closure and posting that date. Upon approval from the Solid Waste Management Program, certain wastes might be accepted to achieve a final grade in the landfill to meet the minimum closure requirements. Otherwise, waste will not be accepted after the planned date of cessation of operations.

Landfill gas and leachate from the landfill will require management throughout the closure period.

Residual wastes or recycling that have accumulated on-site such as white goods, tires, and recyclables will be transported to an appropriate disposal/recycling facility in accordance with the provisions of the Facility Management Plan.

Equipment will be sold or relocated to another facility. Leachate pumps and other necessary equipment will remain on-site and maintained during the post-closure period.

A construction bid package will be prepared and distributed to contractors for bidding. The selected general contractor will be issue a notice to proceed and will begin final closure over the remaining areas of the landfill requiring closure.

Once completed, the general contractor will restore and stabilize all areas.

A final Certification Report will be filed with the Agency.

3. Listing of Labor, Materials, and Testing Necessary to Close the Facility

Closure construction will involve grading landfill slopes; install remaining gas wells and wellheads, gas valves, and related gas system piping that is not already in place; and constructing the cap system. Details depicting the cap section are provided on Plan Sheet 28 of SHA's June 2003 design plans.

Material - The cap section above intermediate cover will consist of the following:

- 6 inches of Screened Bedding Soil (placed directly over the 12" Intermediate cover layer and directly beneath the 40 mil. LLDPE Cap Liner;
- Textured geomembrane consisting of 40-mil linear low density polyethylene (LLDPE);
- Drainage geocomposite;
- 12 inches of granular soil cover; and
- 8 inches of common on site material, and
- 4 inches vegetative layer suitable to support vegetative growth.

Labor - Labor required to complete the closure tasks listed above will include:

- Vertical landfill gas well rig operator and laborer
- General Contractor Site Superintendant
- General Contractor Lead Foreman
- General Contractor Equipment operators to operate all necessary heavy equipment
- General Contractor Laborers
- General Contractor Surveyor/Layout Person
- Liner Installation Technicians
- Liner Installation Heavy equipment Operators
- Liner Installation Laborers
- Liner Installer QA/QC Technician
- Consulting Firm Project Manager
- Consulting Firm Field Inspector

Testing – Construction Quality Assurance and Quality Control will be the responsibility of the Consulting Firm who will ensure that closure construction is performed in accordance with the Agency approved Closure Construction Design Plans and Construction Specifications; This oversight will include but not limited to; approving site subgrade for liner placement, geosynthetics installation, soil collection for laboratory testing, pipe installation, stormwater management installation features, hydroseeding and stabilization.

Prior to installation of the geosynthetics, conformance testing will be performed on samples of the geosynthetic materials delivered to the site to document conformance with the specifications. During installation of geosynthetics, a construction quality assurance consultant will be on site to monitor membrane installation and to observe destructive and non-destructive testing of seams and repairs to the membrane.

4. Anticipated Date of Closure

Based on 600,000 tons per year and through full development of Phases I-IV, the facility would be at capacity in 2023. Closure construction would occur the following year.

5. Schedule for Final Closure

Closure construction will involve the following items of work and estimated time frames.

Work Item	Time Frame (weeks)
Install gas extraction wells	1
Install gas header pipe	2
Fine grade intermediate cover	1
Placement of 6" screened bedding soil	1
Installation of geomembrane (40-mil textured LLDPE)	2
Placement of drainage composite	2
Placement of 12" granular soil cover	2
Placement of 12" vegetative cover (8" of common borrow, 4" of topsoil)	2
Hydroseeding & Restoration	3

6. Cost Estimate for Closure

A cost estimate can be found on page 4 of this document. This estimate is based upon worst case cost scenario between the date of this Closure Plan and 2024.

7. Description of Methods for Compliance with Closure Requirements

NEWSVT will assure compliance with the closure requirements by retaining third party quality assurance consultants to monitor construction and document that the construction was completed in accordance with the approved plans and specifications.

8. Any Remedial Action Prior to Closure, if required by the Secretary

It is not anticipated that remedial action will be required at a lined facility operated in accordance with the requirements of the Facility Management Plan and Solid Waste Management Rules. However, in the unlikely event remedial measures are necessary, they will be implemented as required by the Secretary.

9. Worst Case Closure Scenario

The scenario where the highest cost would be expected to close the facility would be after the construction of Phase IV Cell 4A. A large area to the east of Cell 4A would need to be filled with approximately 795,113 cubic yards of on-site soil to elevate the area sufficient enough for stormwater and snowmelt to gravity drain away from the landfill. The attached "worst case" closure cost estimate reflects this scenario and is detailed on page 4 of this document.

NEW ENGLAND WASTE SERVICES OF VERMONT, INC. (2014)
PHASE I - IV LINED LANDFILL CELLS & RECYCLING DROP-OFF FACILITY
"WORST CASE" CLOSURE COST ESTIMATE FOR PHASE I-III, PHASE IV CELLS 1, 2A, 3A , 2B, 3B , 2C, 3C, AND 4A

71.3 Acres

NO.	ITEM	QUANTITY	UNITS	UNIT COST	ORIGINAL COST	ADJUSTED COST with Completed Cap Sections (11.3 Acres)
1	Engineering Design and Bid Phase Services	1	LS	53,058.82	53,058.82	53,058.82
2	Mobilization/Demobilization	1	LS	87,547.05	87,547.05	87,547.05
3	Gas Extraction Well	3,421	VF	90.21	308,608.41	308,608.41
4	Header Piping	2,776	LF	37.15	103,128.40	103,128.40
5	Lateral Piping	6,914	LF	26.53	183,428.42	183,428.42
6	Control Valves	4	EA	1,591.76	6,367.04	6,367.04
7	Well Heads	30	EA	1,273.41	38,202.30	38,202.30
8	Condensate Traps	0	EA	10,611.76	0.00	0.00
9	Temporary Cap Removal	225,189	SF	0.21	47,289.69	47,289.69
10	6" Screened Bedding Soil (Placed over 12" Intermediate Cover Layer)	57,515	CY	6.90	396,853.50	333,960.00
11	40-mil Textured LLDPE	3,105,828	SF	0.52	1,615,030.56	1,359,072.00
12	Drainage Composite	3,105,828	SF	0.62	1,925,613.36	1,620,432.00
13	12" Granular Soil Cover	115,031	CY	10.61	1,220,478.91	1,027,048.00
14	12" Vegetative Cover (8" of Common Borrow, 4" of Topsoil. Fertilized & Seeded)	115,031	CY	3.72	427,915.32	360,096.00
15	Fill to Achieve Proper Run Off	795,125	CY	1.07	850,783.75	850,783.75
16	Cap Access Road and Riprap Swale	2,000	LF	53.06	106,120.00	106,120.00
17	Cap Access Road (no Riprap Swale)	1,245	LF	31.84	39,640.80	39,640.80
18	Gabion Lined Swales	1,205	LF	47.76	57,550.80	57,550.80
19	Seed and Mulch	71	Acres	1,273.41	90,412.11	90,412.11
20	Erosion Control	1	LS	53,058.82	53,058.82	53,058.82
21	Soil Testing	1	LS	26,529.41	26,529.41	26,529.41
22	Geomembrane Construction Quality Assurance	1	LS	63,670.58	63,670.58	63,670.58
23	Resident Engineering	1	LS	212,235.27	212,235.27	212,235.27
24	Leachate Collection & Treatment During 8 Month	1,422,000	Gallon	0.10	142,200.00	142,200.00
25	Landfill Grading	1	LS	4,244.71	4,244.71	4,244.71
26	Leachate Pump Replacement	1	LS	2,122.35	2,122.35	2,122.35
27	Utility Flare Maintenance in event that Gas To Energy Plant closes	1	LS	1,591.76	1,591.76	1,591.76
28	Vector/Litter Control	1	LS	2,865.18	2,865.18	2,865.18
29	*Recycling Drop-Off area Closure "Worst Case"*					
	A. Transportation & Processing of Recylable Goods	1	LS	636.71	636.71	636.71
	B. Transportation & Disposal of Bagged Trash (Roll-Off Container)	9	Ton	84.89	764.01	764.01
	C. Transportation & Disposal of Metals Roll-Off	1	LS	424.47	424.47	424.47
	D. Disposal of remaining used oil	1	LS	212.24	212.24	212.24
	E. Transportation & Disposal of Tires	800	EA	5.31	4,248.00	4,248.00
	F. Wet Cell & Lead Acid Battery Transportation & Disposal	1	LS	212.24	212.24	212.24
	G. Transportation & Disposal of C&D Pad Materials	2,000	CY	21.22	42,440.00	42,440.00
	H. Transportation & Disposal of Clean C&D	800	CY	10.61	8,488.00	8,488.00
	I. White Good Transportation & Disposal	1	LS	424.47	424.47	424.47
	J. Restoration	1	LS	1,061.18	1,061.18	1,061.18
	(Contingency 10%)					724,017.50
					CLOSURE TOTAL:	$7,964,192.49

Post Closure Plan

2014 POST-CLOSURE PLAN

NEW ENGLAND WASTE SERVICES OF VERMONT, INC. LANDFILL COVENTRY, VERMONT

INTRODUCTION

This Post-Closure Plan identifies the activities to be accomplished after full closure of the NEWSVT (New England Waste Services of Vermont, Inc.) landfill. This Plan has been prepared to specifically address the relevant requirements of 6-1003 (c) 1-4 of the Vermont Solid Waste Management Rules and the "Procedure Addressing Closure and Post Closure Care Requirements at Municipal Solid Waste Landfills." Design drawings referenced in the Post-Closure Plan were prepared by Sanborn, Head & Associates, Inc. (SHA) under the cover sheet "Phase IV Design, New England Waste Services of Vermont, Inc., Coventry, Vermont" and dated January 2003.

1.0 Post-Closure Monitoring

Following closure construction, post-closure monitoring will be performed. The purpose of post-closure monitoring is to observe that the physical integrity of the site is maintained, leachate is pumped and properly disposed, and to perform routine groundwater and landfill gas destruction. Facility systems will be inspected no less than twice each year. The report following each inspection will be submitted to the Solid Waste Management Program (SWMP). Access to the property will be maintained via the main gate to permit post-closure monitoring. An inspection checklist to be used during the post-closure inspection is attached.

Post-Closure monitoring will involve:

- Inspection of the storm water management system, including culverts, swales, and the detention ponds;
- Inspection of landfill cap for evidence of settlement or damage due to erosion;
- Inspection of the leachate collection system appurtenances to see that they are operating properly. This inspection will include, but not be limited to, collection risers, cleanouts, side riser buildings, random inspection of trends in sump levels and pump operations, storage tanks and pumps.
- Groundwater quality monitoring in accordance with State requirements.
- Perimeter landfill gas monitoring at the monitoring probes and permanent devices in accordance with the protocols identified in the Facility Management Plan; and
- Inspection of the landfill gas collection and control system.

2.0 Post-Closure Maintenance

Those items observed to be malfunctioning or damaged noted during monitoring will be repaired in a timely manner; to maintain the integrity of the closed landfill.

Stormwater detention ponds will be cleaned if necessary. Culverts will be checked to see that they are clear and flow impeding sediments that have accumulated in swales will be removed.

Throughout the post-closure period, the leachate pumping system will be maintained. The quantities of leachate removed from both the primary above ground holding tank and each secondary collection system will be recorded. An increase in the rate of leachate removed from the facility would be investigated.

Groundwater monitoring wells will be checked during each sampling round. Damage to a well or its protective casing will be repaired to facilitate continued usage of the well.

The landfill gas collection and control system will be maintained. System components will be repaired as necessary and the blower and flare will be serviced in accordance with the manufacturer's requirements. The landfill gas to energy plant will continue to operate and generate power as long as landfill gas is sufficient to sustain the proper operation of the engines. At such time that the landfill gas to energy plant must stop operating the back up flare would be utilized to destruct the gas.

The surface of the landfill will be monitored for settlement. Benchmarks and control points have been established at the site to provide survey control for topographic surveys of the final cap following closure. The primary concern with settlement is potential damage to the cap or ponding on the geomembrane surface. Differential settlement large enough to result in those conditions will be evident during routine monitoring. Repairs will be undertaken as necessary to assure the cap is graded to promote runoff. The landfill will be mowed as required to prevent trees and shrubs from growing on the capped facility.

3.0 Contact Person

The name, address and phone number of the individual or office to contact about the facility during post-closure period will be provided to the SWMP upon closure and updated as appropriate due to staffing changes, etc.

4.0 Post-Closure Cost Estimate

A post-closure estimate to complete the maintenance and monitoring identified in this plan is on page four of four of this document. The unit costs for the estimate were provided by NEWSVT based on their experience monitoring and maintaining both active and closed landfills. The estimate presents costs in 2014 dollars for a 30-year period of post-closure care.

The post-closure cost estimate reflects reduced costs for maintenance of the cap and site as vegetation becomes established and the slopes stabilize and a reduction in the frequency of groundwater monitoring and/or the parameters for which monitoring is performed. A present value summary of the post-closure costs is provided with the estimate.

NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
POST CLOSURE COST ESTIMATE (PHASES I - III and Phase IV Cells 1, 2A, 2B, 2C, 3A, 3B & 3C) - updated 2014

ITEM	ANNUAL COST YEARS 1-5		ANNUAL COST YEARS 6-10		ANNUAL COST YEARS 11-30	
1. WATER QUALITY (FIELD SERVICES, ANALYTICAL & REPORT) 4 Underdrains, 27 GW Wells, 8 Surface points, 7 Primary Leachate @ $755.00 per location per event.	$69,460.00		$69,460.00		$34,730.00	
2. ENGINEERING INSPECTIONS AND REPORTING REQUIREMENTS	$1,983.90		$994.50		$994.50	
3. SEMI-ANNUAL POST CLOSURE INSPECTIONS	$720.12		$362.10		$362.10	
4. POST CLOSURE MAINTENANCE	$17,569.50		$17,569.50		$17,569.50	
5. GAS AND LEACHATE SYSTEMS MAINTENANCE	$4,800.12		$2,402.10		$1,601.40	
6. LEACHATE COLLECTION AND TREATMENT	$52,453.50		$22,287.00		$13,867.38	
7. 1 YEARS INFLATION @ 2.5%	$3,674.68		$2,826.88		$1,728.12	
TOTAL	$150,661.82		$115,902.08		$70,853.00	
					Present Value Post-Closure Cost:	**$2,137,749.79**

Post Closure Year (Based on 600,000 tons per year)	Calendar Year	Annual Cost (from table above)	Annual Present Value (years 1 - 5)	Annual Present Value (years 6 - 10)	Annual Present Value (years 11 - 30)	**Depreciating Account Balance**
Year 1	2024	$150,661.82	$147,166.61			$1,990,583.18
Year 2	2025	$150,661.82	$143,752.49			$1,846,830.69
Year 3	2026	$150,661.82	$140,417.57			$1,706,413.11
Year 4	2027	$150,661.82	$137,160.02			$1,569,253.09
Year 5	2028	$150,661.82	$133,978.04			$1,435,275.05
Year 6	2029	$115,902.08		$100,676.41		$1,334,598.63
Year 7	2030	$115,902.08		$98,340.82		$1,236,257.81
Year 8	2031	$115,902.08		$96,059.41		$1,140,198.40
Year 9	2032	$115,902.08		$93,830.92		$1,046,367.48
Year 10	2033	$115,902.08		$91,654.14		$954,713.34
Year 11	2034	$70,853.00			$54,729.97	$899,983.37
Year 12	2035	$70,853.00			$53,460.29	$846,523.09
Year 13	2036	$70,853.00			$52,220.06	$794,303.03
Year 14	2037	$70,853.00			$51,008.60	$743,294.42
Year 15	2038	$70,853.00			$49,825.26	$693,469.17
Year 16	2039	$70,853.00			$48,669.36	$644,799.81
Year 17	2040	$70,853.00			$47,540.28	$597,259.53
Year 18	2041	$70,853.00			$46,437.39	$550,822.15
Year 19	2042	$70,853.00			$45,360.09	$505,462.06
Year 20	2043	$70,853.00			$44,307.78	$461,154.28
Year 21	2044	$70,853.00			$43,279.88	$417,874.40
Year 22	2045	$70,853.00			$42,275.83	$375,598.57
Year 23	2046	$70,853.00			$41,295.07	$334,303.50
Year 24	2047	$70,853.00			$40,337.07	$293,966.44
Year 25	2048	$70,853.00			$39,401.28	$254,565.15
Year 26	2049	$70,853.00			$38,487.21	$216,077.94
Year 27	2050	$70,853.00			$37,594.35	$178,483.59
Year 28	2051	$70,853.00			$36,722.20	$141,761.40
Year 29	2052	$70,853.00			$35,870.28	$105,891.12
Year 30	2053	$70,853.00			$35,038.12	$70,853.00

*Annual present value cost calculated by multiplying the annual post closure cost by a discount factor (DF) calculated as follows: Df = (1 + ir - j - ir*j) ^-t (Assuming Annual interest rate of 5%; 2.5% inflation).

Property Deed

WARRANTY DEED

KNOW ALL MEN BY THESE PRESENTS THAT Waste U.S.A Inc., a Vermont Corporation with a principal place of business in the Town of Coventry, County of Orleans and State of Vermont, Grantor in consideration of One or More Dollars paid to its satisfaction by New England Waste Services of Vermont, Inc., a Vermont Corporation with a principal place of business at Rutland, County of Rutland and State of Vermont, Grantee, by these presents do freely GIVE, GRANT, SELL, CONVEY, and CONFIRM unto the said Grantee, New England Waste Services of Vermont, Inc., and its successors and assigns forever, a certain piece of land in the Town of Coventry, County of Orleans and State of Vermont, described as follows, viz:

Being all of the lands described in Exhibit A attached hereto and incorporated into the terms of this Deed by reference.

Excepting and reserving unto the Grantor all air space superjacent to the landfill footprint for which governmental permits have been or will be obtained above the conveyed premises. Grantor retains the sole lawful and present possession of the said retained superjacent airspace and it retains the sole rights, power and authority to lease it.

Cont on pg 342.

Grantor gives and grants to Grantee, a perpetual right in, over, across, and upon the retained airspace volume for reasonable access for the operation of its solid waste management facility and for the maintenance, construction, repair, reconstruction, relocation, renewal, alteration, removal, and inspection of improvements necessary for Grantee's operation of its solid waste management facility.

TO HAVE AND TO HOLD SAID GRANTED PREMISES, with all the privileges and appurtenances thereof, to the said Grantee, New England Waste Services of Vermont, Inc., and it successors and assigns, to its and their own use and behoof forever; and said Grantor, Waste U.S.A., Inc., or its successors and assigns to covenant with the said Grantee, Waste U.S.A., Inc., and its successors and assigns until the unsealing of these presents that it is the sole owner of the premises and has good right and title to convey the same in manner aforesaid and that they are free from every encumbrance except as aforesaid, and it hereby engages to warrant and defend the same against all lawful claims whatsoever, except as aforesaid.

IN WITNESS WHEREOF, a duly authorized officer of Grantor hereunto sets his hand and seal this 25th day of January, 1995

WASTE U.S.A., Inc.

Catherine Kork by: _____
Witness Duly Authorized Officer

STATE OF VERMONT
~~Washington~~ ~~CHITTENDEN~~ COUNTY, SS:

At ~~Burlington~~ Montpelier, Vermont this 25th day of January, 1995, Jean-Pierre Parcourt duly authorized agent of Waste U.S.A. Inc., personally ~~appeared~~ and acknowledged this instrument by him sealed and subscribed to be his free act and deed and the free act and deed of Waste U.S.A. Inc.

Before me Catherine Kork
Notary Public

Commission Expires: 2.10.95

EXHIBIT A

PARCEL 1:

Being a parcel of land consisting of 276 acres, more or less, and being all and the same lands and premises conveyed to Waste U.S.A., Inc. by Warranty Deed of Charles H. Nadeau and Myrna R. Nadeau dated October 24, 1989, of record in Volume 29 at Page 193 of the Coventry Land Records.

PARCEL 2:

Being a parcel of land consisting of 41 acres, more or less, and being all and the same lands and premises conveyed to Waste U.S.A., Inc. by Warranty Deed of Leslie J. Joseph dated May 22, 1992, of record in Volume 31 at Page 101 of the Coventry Land Records.

PARCEL 3:

Being a parcel of land consisting of 114.8 acres, more or less, and being all and the same lands and premises conveyed to Waste U.S.A., Inc. by Warranty Deed of Leslie J. Joseph dated May 22, 1992, of record in Volume 31 at Page 99 of the Coventry Land Records.

PARCEL 4:

Being Lots 1, 2, 3, 4 and 5, and being all and the same lands and premises conveyed to Waste U.S.A., Inc. by Warranty Deeds of Charles H. Nadeau and Myrna R. Nadeau dated October 24, 1989, of record in Volume 29 at Pages 195 through 202 of the Coventry Land Records **EXCEPT** a parcel of land containing 8.9 acres, more or less, conveyed by Waste U.S.A, Inc. to Leslie J. Joseph dated October 1, 1993, of record in Volume 31 at Page 509 of the Coventry Land Records.

PARCEL 5:

Being all and the same lands and premises conveyed to Waste U.S.A., Inc. by Warranty Deed of Therese B. Gervais dated January 24, 1995, of record in Volume 32 at Page 340-341 of the Coventry Land Records. Also being all and the same lands and premises conveyed to Therese B. Gervais by Warranty Deed of Mary Lou Duff dated November 2, 1993, of record in Volume 31 at Page 499 of the

COVENTRY CLERK'S OFFICE
RECEIVED & RECORDED
Jan 26 1995 1:32 P.M.
BOOK 32 PAGE 341-342
ATTEST: Peggy J. Kinsley
TOWN CLERK

VERMONT PROPERTY TRANS
32 V.S.A. CHAP. 231
- ACKNOWLEDGEM
RETURN RECEIVE
(INCLUDING CERTIFICATES AND, IF F
250 DISCLOSURE STATEMENT) A
Retur
Sign
Date
1-25-95

Current Certification

VERMONT
ENVIRONMENTAL CONSERVATION

Vermont Agency of Natural Resources
Department of Environmental Conservation
Solid Waste Management Program

SOLID WASTE MANAGEMENT FACILITY

OWNER/OPERATOR:	New England Waste Services of Vermont, Inc. 25 Greens Hill Lane Rutland, VT 05702
SOLID WASTE IDENTIFICATION NUMBER:	OL510
ANR PROJECT IDENTIFICATION NUMBER:	SJ91-0001
LOCATION:	21 Landfill Lane, Coventry, Vermont
LANDOWNER:	New England Waste Services of Vermont, Inc

PURPOSE AND DESCRIPTION:

Continued construction and operation of Cells 1, 2, and 3 in Phase IV and new construction and operation of Cell 4 of Phase IV. Continued operation of Phase III and closure operations of Phases I and II. Continued operation of other non-disposal solid waste management components including: the residential drop-off for solid waste and recyclable materials; collection of used motor oil; collection and storage of leaf and yard waste; collection and storage of waste tires; and a staging area for approved Household Hazardous Waste and Conditionally Exempt Generator Hazardous Waste collection events. Post-closure maintenance and monitoring of closed, unlined landfill areas A and B.

APPLICATION REVIEW:

The application for re-certification was received by the Solid Waste Management Program (Program) on March 17, 2009. It was reviewed in accordance with the Waste Management Act, 10 V.S.A. §6601 et seq., with the Solid Waste Management Rules, (eff. June 12, 2006) (Rules), and applicable Solid Waste Management Procedures (Procedures). The application is on file in the office of the Program in Waterbury, Vermont and at the Town Clerk's office in the Town of Coventry.

CERTIFICATION PERIOD: October 18, 2010 to March 31, 2015

FINDINGS

a. The existing facility consists of the operating solid waste management components listed in the Purpose and Description on Page 1.

b. On October 5th, 2004, the Agency issued a certification to New England Waste Services of Vermont, Inc. (NEWSVT) that authorized the operation of the existing facility.

c. On March 17, 2009, the Agency received an application for re-certification from NEWSVT that requests the construction and operation of cells 1, 2, and 3 of the Phase IV expansion to the landfill and re-certification for continued operation of the existing facility. The existing facility together with the construction and operation of Phase IV are hereinafter referred to as the (Facility).

d. The Facility is located west of Airport Road in Coventry Vermont at 72°13′ 32″ West Longitude and 44°54′ 37″ North Latitude.

e. A copy of the complete application for re-certification was provided to the Town of Coventry on March 17, 2009, in compliance with 10 V.S.A.§ 6605(f).

f. On March 26, 2009, the Agency determined that the Application was administratively complete and that the application was both timely and sufficient. Under the provisions of 3 V.S.A. § 814, the certification dated October 5th 2005 did not expire until the Agency makes a final determination on the application for re-certification.

g. Pursuant to the requirements of § 6-305(a)(2) of the Rules, NEWSVT implemented the Notice of Application Plan and published a notice of application in the *Newport Daily Express* and *The Chronicle* on April 7th and April 9th 2009 respectively.

h. Pursuant to 10 V.S.A. § 6605(c), the Secretary finds that the Facility is included in the Town of Coventry Solid Waste Implementation Plan, approved by the Department on September 12, 2008. The Secretary also finds that the Facility is in conformance with both the Northeastern Vermont Development Association Regional Plan and the Town of Coventry Municipal Plan, adopted pursuant to the requirements of 24 V.S.A. Chapter 117.

i. Based on an evaluation of the information submitted by NEWSVT, the Secretary has not found that:

   1) NEWSVT, Inc. or any person required to be listed on the disclosure statement pursuant to 10 V.S.A. § 6605f(b)(1), have been convicted of any of the disqualifying offenses set forth in that subdivision within the ten (10) years preceding the date of application; nor that

2) NEWSVT, Inc. or any person required to be listed on the disclosure statement pursuant to 10 V.S.A. § 6605f(b)(1) have committed more than one (1) violation of environmental statutes, rules, orders, certifications or permits issued by any jurisdiction, which have the potential to significantly harm the public health, public safety or the environment, giving due consideration to the size and scope of the applicant's business operations.

j. Based on the information in the application and Facility operation and performance, the Program has determined that the Facility is capable of operating at a maximum operating capacity of up to 370,000 total tons of solid waste per year and up to 2,500 total tons of solid waste per day. NEWSVT submitted an application fee of $187,500 that corresponds to an operating capacity of 250,000 total tons of solid waste per year. Phases III, and IV will be certified at the maximum operating capacity of 370,000 tons per year and 2,500 tons per day However, the operating capacity at the time this certification is issued is limited to 250,000 tons per year and 2,500 tons per day until the additional application fees are submitted and written authorization issued.

k. NEWSVT submitted Closure and Post-Closure plans for the Facility in accordance with Subchapter 10 of the Rules. The Closure and Post-Closure plans for the Facility are in conformance with the requirements of the Rules and applicable Solid Waste Management Procedures.

l. NEWSVT established Surety Bond # 850688 in the amount of $6,090,131.51 for closure of the Facility and Surety Bond # 850689 in the amount of $2,099,226.35 for post closure of the Facility. The Evergreen National Indemnity Company is the Surety for both Bonds. These Surety Bonds are in conformance with Subchapter 9 of the Rules.

m. A detailed summary of the re-certification applications' conformance with the requirements of applicable Rules and Procedures is in the Fact Sheet.

n. NEWSVT has a contract with Washington Electric Co-op (WEC) to allow WEC to use the landfill gas generated at the NEWSVT as a fuel to produce electricity. The electrical generation power plant consists of a building located at the northeast corner of Phase I that contains engines, turbines or the equivalent to convert landfill gas to energy. Electrical generation is an alternative to combustion of the methane and other landfill gas via a flare system. NEWSVT is ultimately responsible for managing the landfill gas collection system and for the proper destruction of landfill gas.

o. On June 10, 2010 the application was determined to be technically complete and that it conforms to the Rules and other applicable statutory and regulatory requirements.

p. On July 26, 2010, the Program published a notice for a public information meeting and a public comment period to accept public comment on the Draft Certification and Fact Sheet. A public information meeting was held on August 11, 2010 at 7:00 PM to accept public Comment. The public comment period ended on August 27, 2010. Several comments were received and are addressed in the Responsiveness Summary.

10 V.S.A. § 1390(5) FINDINGS OF FACT

q. The proposed facility is located in an area that has been designated as Class III groundwater pursuant to 10 V.S.A. § 1394(b) and EPR Chapter 12 § 12-401(1). The permissible uses of groundwater in a Class III designated area are established in 10 V.S.A. § 1394(a) and general industrial and commercial uses are permissible uses of groundwater pursuant to that section. The proposed facility is classified as an industrial use and the Secretary finds the activity certified herein to be consistent with the groundwater classification.

r. The Secretary has established the property line as the point of compliance for the proposed facility pursuant to EPR Chapter 12 § 12-801. Based on the application for certification, the proposed design of the facility, the nature of the waste being disposed of and the comprehensive testing which has taken place at the site, the Secretary has determined that the facility as proposed will not cause an exceedence of any standard at the point of compliance.

s. Based on the findings contained in q. and r. the Secretary concludes that the requirement of 10 V.S.A. § 1390(5) has been satisfied provided that the Permittee complies with the conditions contained within the Section of this certification entitled "*Releases, Corrective Action, and Continuing Obligations pursuant to 10 V.S.A. § 1390(5).*"

CONDITIONS AND REQUIREMENTS FOR CONSTRUCTION AND OPERATION

1. The Permittee shall construct, develop, and operate the Facility in accordance with the terms of this Certification and with the applicable provisions of State law, including the Rules. Compliance with this certification does not relieve the Permittee from complying with all applicable local, State, and Federal laws.

2. The following documents submitted as part of the application are hereby incorporated by reference in this certification:

   - *NEW ENGLAND WASTE SERVICES OF VERMONT, INC, Landfill Facility, Recertification Application, March 16, 2009* Prepared by New England Waste Services of Vermont Inc.

- *Facility Management Plan* (FMP), original document dated March 16, 2009, prepared by NEWSVT and final revisions September 24, 2010;

- *Letter to the Program from NEWSVT dated June 8, 2010.* Letter includes updated closure and post closure cost estimates.

Additions or alterations to these documents, including but not limited to construction change orders, must be approved by the Agency prior to implementation. Material or substantial additions or alterations which justify the application of conditions different or absent from the Certification are cause for modification or amendment of this Certification.

3. If at any time during the term of this certification the Secretary finds there is no approved solid waste implementation plan for the area in which this facility is located, or that the solid waste implementation plan for the area in which this facility is located no longer includes this facility, this certification will be subject to revocation or suspension under §6-307 of the Rules.

4. The Permittee shall not dispose of any solid waste into any new cell until the registered professional engineer in charge submits a written certification to the Program that the cell was constructed in accordance with the approved plans, specifications, approved change orders, and requirements of this Certification and the Rules.

5. The Permittee shall notify the Program in writing prior to disposing of any solid waste into any new cell.

6. The Permittee shall install markers indicating the limit of waste containment. The limit of waste markers shall remain until the landfill slopes have reached final slope elevation.

7. The Permittee shall maintain an approved financial responsibility instrument pursuant to Subchapters 9 and 10 of the Rules; with § II(A) of the *Procedure Addressing Closure Cost Estimates for Solid Waste Landfills*; and, with § II(C) of the *Procedure Addressing Post-Closure Care and Post-Closure Certification of Solid Waste Landfills,* both dated February 8, 1999.

8. The Permittee shall maintain a valid pretreatment discharge permit from the VTANR Wastewater Management Division for leachate managed in Vermont If managed out of the State of Vermont, leachate disposal must take place at a permitted wastewater treatment facility.

9. The Permittee shall have access to weather monitoring station within 3 miles of the facility. The weather station shall give live data as well as two weeks of history data. Data shall include wind speed and direction, temperature and precipitation at minimum.

10. On or before **April 1, 2011** and annually each certification year, the Permittee shall remit to the Program the annual application fee equal to the annual operating capacity in accordance with 3 V.S.A. § 2822. If the Permittee does not remit the required annual application fee, this certification will be subject to revocation or suspension under §6-307 of the Rules.

11. On or before **February 1, 2012**, and **February 1, 2014**, the Permittee shall review the approved closure and post-closure care plans and the closure and post-closure cost estimates and shall submit to the Program written documentation that provides the information required by § 6-1006(a)-(c) of the Rules, consisting of either:

    a. a report that certifies that the closure and post-closure plans are consistent with current operations and regulations and either provides revised closure and post-closure cost estimates or indicates that there have been no changes to the closure and post-closure cost estimates; or

    b. an application for modification or amendment of this Certification due to substantive changes to the closure or to the post-closure plan.

12. On or before **February 1, 2011** and annually thereafter, the Permittee shall adjust the closure and post-closure cost estimates for inflation in accordance with § II (A) of the *Procedure Addressing Closure Cost Estimates for Solid Waste Landfills* and with § II(C) of the *Procedure Addressing Post-Closure Care and Post-Closure Certification of Solid Waste Landfills*, both dated February 8, 1999.

13. The Permittee shall retain a registered engineer to perform an annual inspection of the landfill during the **month of May** each Certification year. At a minimum, the engineer shall evaluate the actual landfill development and the daily operations for conformance with the FMP and the requirements of the Rules, this certification and applicable Solid Waste Management Procedures. The engineer shall inspect and evaluate the integrity of the final cover system for those portions of the landfill that have been previously closed. The Permittee shall notify the Program concerning any non-compliance with this certification or any emission or discharge noted by the engineer and take corrective action in accordance with § 6-703 of the Rules. The engineer shall develop any recommendations necessary for improving the management of the landfill. In consultation with the Program, the Permittee shall implement those recommendations approved by the Program.

RE-CERTIFICATION

14. On or before **September 1, 2014**, the Permittee shall apply for re-certification of the Facility, or submit a schedule for implementation of the closure plan.

MATERIALS AND SITE MANAGEMENT, NON DISPOSAL COMPONENT MANAGEMENT

Materials Management

15. The Facility is certified for a maximum allowable capacity of 2,500 tons of solid waste per day and 370,000 tons of solid waste per year for disposal. The operating capacity at the time this certification is issued is set at 2,500 tons of solid waste per day and 250,000 tons of solid waste per year. The yearly tonnage acceptance calculation shall begin on **April 1** and end on **March 31** each certification year. Upon written request and submittal of the appropriate additional application fees by the Permittee, the Program may authorize increases in the annual operating capacity up to 370,000 tons of solid waste per year. Such increases may be authorized by written approval by the secretary and not by a permit amendment.

16. Any request to increase the annual operating capacity in an amount that exceeds the maximum allowable annual capacity of 370,000 tons of solid waste per year or the maximum allowable daily capacity over 2,500 tons of solid waste per day will require the Permittee to apply for an amendment to the Certification pursuant to §6-305 of the Rules.

17. Acceptable wastes for disposal in the landfill are limited to municipal solid waste, construction and demolition debris (C&D), de-watered sludge or biosolids, approved uniform solid waste, and any other non-hazardous waste which is not prohibited by Conditions 18, 19 and 22

18. The disposal of regulated hazardous waste is prohibited. Hazardous waste determinations are conducted pursuant to Subchapter 2 of Vermont's Hazardous Waste Management Regulations. It is the responsibility of the Permittee to ensure that all wastes disposed of are non-hazardous.

19. The facility shall ensure that all wastes prohibited for disposal pursuant to 10 V.S.A. § 6621a are not disposed of at the facility.

20. For the purposes of this certification the following definitions shall apply:

    a. "Implemented Waste" means all solid waste which originates from a municipality which manages waste in accordance with a solid waste implementation plan approved by the Secretary;

    b. "Non-Implemented Waste" means all solid waste which originates from a municipality that does not have a solid waste implementation plan approved by the Secretary; and

c. "Approved Uniform Solid Waste" means solid waste which has been determined in writing by the Secretary to be uniform and does not contain yard waste, marketable recyclable materials, hazardous waste as defined by State and/or Federal regulation.

d. "Approved Processed Construction and Demolition Debris" is waste that meets the requirements of Condition 21 and 22.

21. The Permittee may accept the residual from processed construction and demolition debris with the prior written approval of the Secretary when the processing takes place in a municipality without an approved solid waste implementation plan. In making this request, the following information shall be provided: The location of the facility processing the construction and demolition debris; a copy of any solid waste facility permit that the processing facility holds; a narrative description of the processing that takes place at the facility, including specific information on how marketable recyclables, hazardous wastes, including waste from households and conditionally exempt generators, and yard wastes are removed; a certification that the process residual is solely construction and demolition debris and the process residual contains no municipal solid waste; and a certification that marketable recyclables, hazardous wastes, and yard wastes have been removed from the processing residual.

22. The Permittee shall not accept for disposal at the Facility "Non-Implemented Waste". The Permittee may accept "Approved Uniform Solid Waste" and "Approved Processed Construction and Demolition Waste" only in accordance with the standards set forth in the Secretary's written approval for that waste.

23. The Permittee shall post clearly visible and easily read signs at the facility, providing notice of the prohibition of the disposal and combustion of mercury-added products and provide customers information about collection programs and facilities that are permitted to accept mercury-added products.

24. The Permittee shall not dispose recyclable materials previously source separated by the hauler or the commercial or residential customer.

25. The Permittee shall ensure that all solid waste disposed in landfill complies with the liquid waste disposal limits included in the Agency's *Procedure Addressing Liquid Waste Disposal Restrictions in Municipal Solid Waste Landfills*, dated February 8, 1999 (Liquid Waste Procedure).

26. The Permittee shall conduct random inspections of incoming loads of solid waste and manage wastes removed in accordance with Section 4.0 of the FMP.

<u>Site Management</u>

27. The Permittee may accept solid waste between the hours of 6:30 am to 4:00 pm Monday through Friday, and between the hours of 6:30 am to 11:30 am on Saturdays. All other

routine landfill operations, such as inspections, maintenance, repairs, monitoring and application of daily cover will be conducted between the hours of 5:00 am and 6:00 pm Monday through Saturday. The Facility's operational hours for accepting solid waste and other routine landfill operations may be expanded without amendment to this Certification upon written approval from the Secretary upon a showing of need. Such a showing shall include special events such as Green-Up day, a natural disaster, or other unforeseen circumstances that are outside of the control of the Permittee.

28. The depth of leachate shall not exceed twelve (12) inches at any location on the primary liner, except following a 25-year/24 hour or greater storm event. Following such an emergency, leachate may be stored on the liner for a maximum of five (5) days. Leachate collection tanks shall be managed in accordance with Sections 5.1, 5.2 and 5.3 of the FMP.

29. The Permittee shall comply with the run-on and run-off control system requirements included in the Agency's *Procedure Addressing Requirements For Run-On/Run-Off Control Systems for Municipal Solid Waste Landfills*, dated June 9, 1994.

30. The Permittee shall operate the landfill with personnel and equipment identified in Section 3.11 of the FMP.

31. The Permittee shall cover all exposed waste at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires and odors, to prevent blowing litter and to discourage scavenging by animals. When earthen material is used it shall be a minimum thickness of six (6) inches. Upon written request, the Secretary may grant the Permittee approval in writing for the use of an alternative daily cover material, in accordance with the Agency's *Procedure for Approval of Alternative Daily Cover at Solid Waste Facilities*, dated February 8, 1999.

32. The Permittee shall inspect for and collect litter at and around the Facility daily. The Permittee shall collect litter along both sides of Route 5 one mile north and south of the Airport Road intersection. The Permittee shall also collect litter on Airport Road between the Route 5 intersection and Laramee Road on a weekly basis.

33. The Permittee shall require that all waste hauling vehicles leaving the Facility are properly cleaned to prevent off-site litter.

34. In the event any of the monitoring wells established as part of the approved water quality monitoring program are destroyed or rendered unusable, the Permittee shall replace those monitoring well(s) in accordance with the Agency's *Procedure Addressing Ground Water Quality Monitoring and Responses When A Ground Water Standard is Reached or Exceeded at Municipal Solid Waste Landfills*, dated February 8, 1999 (Ground Water Procedure).

35. In the event of an unplanned temporary shut down of the Facility, the Permittee may construct and operate the contingency transfer station as described in Section 12 of the FMP.

36. Electric generation operations shall not interfere with landfill construction, operation, closure and post closure. Any landfill gas that is not used or otherwise destroyed in the production of electricity must be destroyed using a flare or equivalent. The Permittee is ultimately responsible for managing the landfill gas collection system and for the proper destruction of landfill gas.

37. The Permittee shall operate and maintain a video camera that monitors the active landfill operation. The camera shall operate 24 hrs per day. Upon request of ANR staff, a copy of the previous 2 weeks video shall be available within 24 hours.

38. No liner or synthetic material construction shall take place if snowpack has been established without prior approval from the Secretary.

Drop-off and Storage Components

39. All solid waste and recyclable materials collected at the drop-off shall be managed in accordance with Section 6.0 of the FMP.

40. No more than four roll-off boxes of tires shall be stored at the Facility at any time.

41. All used motor oil collected at the Facility shall be managed in accordance with Subchapter 8 of the Vermont Hazardous Waste Management Regulations.

MONITORING REQUIREMENTS

42. The Permittee shall maintain records of all monitoring data required by Conditions 43 through 49 at the landfill office and make them available for State Inspection.

43. The Permittee shall record leachate flow from the primary and secondary leachate collection systems to the leachate storage tanks during each working day. Records shall be made separately for Phases I, II, III and IV. In addition, the Permittee shall record the quantity of leachate removed from the leachate storage tanks. For each load of leachate shipped, the Permittee shall record the quantity of leachate, the date shipped, and the identity of the wastewater treatment facility receiving the shipment.

44. Explosive gas monitoring shall be performed monthly for the detection of off-site migration of methane and weekly for the detection of methane in Facility structures and other buildings on the Facility site in accordance with the Agency's *Procedure Addressing Explosive Gas Control at Municipal Solid Waste Landfills*, dated June 9, 1994 (Explosive Gas Control Procedure). If methane levels exceed 25% of the lower explosive limit (LEL) in Facility structures or other buildings on site or if the LEL is exceeded on the Facility site or at the property boundary, the Permittee shall take immediate action in accordance with the requirements of the Explosive Gas Control Procedure.

45. During the first week of each month, the Permittee shall collect field measurements for temperature, pH and specific conductance from the underdrain system outlets for Phases I, II, III, and IV. Field measurements shall be performed at the underdrain discharges as shown on approved Environmental Monitoring Plan, Sheet 36 of 36 of the Design Drawings. Estimated discharge in gallons per day shall be determined from each underdrain discharge point.

46. During the months of May and October of each certification year, the Permittee shall retain a qualified professional to perform groundwater quality monitoring. Sampling locations shall include the groundwater monitoring wells described in Section 2.1 of the Monitoring Program and shown on the Environmental Monitoring Plan, Sheet 36 of 36 of the Design Drawings. All groundwater samples shall be collected and analyzed in accordance with § III C of the Agency's Ground Water Procedure. In addition, the Permittee shall analyze all monitoring well samples for dissolved iron and manganese. Antimony, barium, beryllium, cobalt, selenium, silver, thallium or vanadium may be deleted from the ground water monitoring program if the Permittee makes the demonstration contained in Appendix C of the Ground Water Procedure and has received written approval from the Secretary.

47. During the months of May and October of each certification year, the Permittee shall retain a qualified professional to perform surface water monitoring and underdrain monitoring. Sampling locations shall include the surface water and underdrain monitoring locations described in Section 2.2 of the Monitoring Program and shown on the Environmental Monitoring Plan, Sheet 36 of 36 of the Design Drawings. The following laboratory analyses shall be performed on all surface water and underdrain outlet water samples:

- Chemical Oxygen Demand;
- Biological Oxygen Demand;
- Total Sodium, Total Chloride,
- Hardness expressed as mg/l $CaCO_3$;
- The following total metals: Arsenic, Cadmium, Chromium, Copper, Iron, Lead, Manganese, Mercury, Nickel, and Zinc;
- Volatile Organic Compounds utilizing EPA Method 8260; and,
- Semi-Volatile Organic Compounds utilizing EPA Method 8270.

Field tests for temperature, pH, and specific conductance shall be performed on samples from each sample location.

48. During the months of May and October of each certification year, the Permittee shall retain a qualified professional to perform leachate monitoring. Monitoring shall be performed by collecting a grab sample consisting of leachate collected from the primary leachate collection system separately for Phases I, II, III and IV. In addition if the average daily secondary detection system flow exceeds 20 gallons per acre per day in any of the secondary detection systems, a grab sample of liquid shall be collected from that secondary detection system. The following laboratory analyses shall be performed on all primary and secondary samples:

- Chemical Oxygen Demand;
- Biological Oxygen Demand;
- Total Sodium, Total Chloride,
- The following total metals: Arsenic, Cadmium, Chromium, Copper, Iron, Lead, Manganese, Mercury, Nickel, and Zinc;
- Volatile Organic Compounds utilizing EPA Method 8260; and,
- Semi-Volatile Organic Compounds utilizing EPA Method 8270.

Field tests for temperature, pH, and specific conductance shall be performed on samples from each sample location.

49. The Permittee shall continue with the monitoring program to assess the effectiveness of bird management as described in Sections 3.13 and Exhibit D of the FMP. In addition, the monitoring program shall include the following:

a. a detailed quantitative observation of towering (circling) gulls and crows above the active landfill and a determination if the towering gulls cross air traffic flight patterns; and,

b. an analysis by the Bird Management Consultants to determine if the location and operation of the Facility is increasing the likelihood of bird/aircraft collisions over what would exist with only closed and capped landfills at the site.

REPORTING REQUIREMENTS

50. On or before **June 30** each Certification year, the Permittee shall submit to the Program a copy of the engineer's written evaluation, any recommendations for improving the management of the landfill and a schedule for implementation of the recommendations pursuant to Condition 13.

51. On or before **February 1** each Certification year, the Permittee shall submit the adjusted closure and post-closure cost estimates for inflation pursuant to Condition 12.

52. On or before the 15th day of each month, the Permittee shall submit the following data to the Program:

a. records of daily leachate flows required by Condition 43;

b. records of the quantity of leachate pumped, quantity of leachate shipped and the name of the facility receiving the leachate for the previous month as required by Condition 43; and

c. field measurements for temperature, pH, specific conductance, and discharge volume from the underdrain system as required by Condition 45.

53. On or before **January 31, April 30, July 31, and October 31**, of each Certification year, the Permittee shall submit a quarterly report to the Program, on forms provided by the Program for (a) through (c) and on forms approved by the Program for (d) and (e). Quarterly reports shall be true, accurate and complete. The reports shall contain the following information:

a. the quantity and quality of wastes by type, managed by the Facility;

b. the sources, by municipality, of all solid wastes delivered to the Facility;

c. the quantity, type and source of wastes used for alternative cover during the calendar quarter;

d. records of monthly and weekly gas monitoring results required by Condition 44; and,

e. a written evaluation of the effectiveness of the bird management program required by Condition 49.

54. On or before **March 31** each Certification year, for each municipality disposing waste at the landfill, the Permittee shall submit to the Program a written certification that (a) hazardous wastes and recyclables are removed from the waste stream according to the approved plan, or (b) that the facilities, programs and ordinance required under Condition 20(a) were complied with for the previous year.

55. Within 60 days after the dates of sampling required by Conditions 46, 47, and 48 of this Certification, the Permittee shall:

a. For all groundwater samples, submit to the Program current and historic groundwater quality results, statistical evaluation, and narrative assessment in accordance with § III(E) of the Ground Water Procedure;

If the report and statistical evaluation concludes in a preliminary finding that parameters in ground water exceed any standard at a point of standards application, the Secretary may initiate a response in accordance with § III(F) of the Ground Water Procedure;

b. For all leachate samples, submit to the Program current and historic leachate quality results, tabulated by sampling location through time. Include in the tabulated data the Maximum Concentration of Contaminants for the Characteristic of Toxicity in the Vermont Hazardous Waste Management Regulations; and,

c. For all surface water and underdrain samples, submit to the Program current and historic surface water quality results and compare the results with the Vermont Water Quality Standards.

56. The Permittee shall submit the data and evaluations required in Condition 55 above to the Gouvernement du Quebec Ministere de l'Environnement, Direction regionale de l'Estrie, 770 Goretti St., Sherbrooke, Quebec J1E 3H4, to MRC Memphremagog, 455 rue MacDonald, bureau 200, Magog, Quebec J1X 1M2 and Ville de Sherbrooke 555, rue des Grandes-Fourches Sud, bloc B; C.P. 610, Sherbrooke QC J1H 5H9 Criteria for Major vs. Minor on or before January 31, each year for the results obtained from the preceding year.

RELEASES, CORRECTIVE ACTION, AND CONTINUING OBLIGATIONS PURSUANT TO 10 V.S.A. § 1390(5)

57. The Permittee shall take all reasonable steps to ensure that the activities taking place at the facility do not result in a discharge, emission, or release of a waste material into the environment.

58. In accordance with §6-703 of the Rules, the operator shall submit a report to the Agency within five working days of the receipt of any information indicating non-compliance with any term or condition of Certification. Any discharge, emission, or release which poses a threat to public health and safety, a threat to the environment or the creation of a nuisance must be reported within 24 hours to the Agency, and the local health officer. A written report shall be submitted to the same parties within seven days of the discharge, emission, or release. The report shall identify the discharge, emission, or release that occurred, the type, quantity, and quality of waste, and the actions taken to correct the problem.

59. In the event of noncompliance with the permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

60. In the event the Secretary determines that a review of water quality data or a discharge, emission, or release from the facility, indicates an undue adverse impact on ground water, surface water, or drinking water quality from the Facility, the Secretary shall review the information and make a determination as to whether corrective action is required. If the Secretary determines that the information is inadequate, the Secretary shall require the Permittee to:

a. increase the frequency of water quality sampling and analyses, or increase the number of parameters tested for;

b. establish additional sampling locations and/or install additional monitoring wells; or

c. conduct all studies necessary to determine the source and extent of contamination.

61. In the event that the Secretary determines that corrective action is necessary to prevent or remedy damage to the public health and safety or to the environment, or to correct a violation of environmental standards, the Secretary shall require corrective action and a demonstration of financial responsibility for corrective action, in accordance with the Agency procedure entitled *Procedure Addressing Corrective Action and Financial Responsibility for Corrective Action at Solid Waste Landfills*, adopted February 8, 1999.

CLOSURE AND POST-CLOSURE REQUIREMENTS

62. The Permittee shall submit to the Program a notice of closure thirty days after the date the final volume of waste is received. Closure of any portion of Phases I, II, III and IV shall occur as described in the *Closure Section* of the Certification Application, Section 3.5 of the FMP, as described in Section 5.0 of the Design Report and as shown on Sheets 28 and Sheets 30 through 35 of the Design Drawings.

63. No later than ninety (90) days after completion of the closure system for any portion of Phases I, II, III and IV, the Permittee shall submit certification of closure to the Department, pursuant to Section 6-1002(i) of the Rules. This certification shall include a complete set of "record" engineering plans documentation of results of all material and quality assurance/quality control testing performed with respect to closure of the Facility, and documentation of any new or abandoned ground water monitoring wells and surface water sampling locations.

64. Post closure maintenance and monitoring of the Facility shall occur in accordance with the *Post Closure Section* of the Certification Application.

65. The Permittee shall retain a registered engineer to perform an annual evaluation of the landfill during the month of May each Certification year. The engineer shall inspect and evaluate the integrity of the final cover system, gas collection system, and the leachate collection system for conformance with the Post Closure Plan and the requirements of the Rules, this certification and applicable Solid Waste Management Procedures. The Permittee shall notify the Program concerning any non-compliance with this certification or any emission or discharge noted by the engineer and shall take corrective action in accordance with § 6-703 of the Rules. The engineer shall develop any recommendations necessary for improving post closure care of the landfill. By **June 30** each Certification year, the Permittee shall submit to the Program a copy of the engineer's evaluation, any recommendations for improving the post closure care of the landfill and a schedule for implementation of the recommendations. In consultation with the Program, the Permittee shall implement the recommendations approved by the Program.

GENERAL CONDITIONS

66. Permittee shall at all times properly operate and maintain all facilities which are installed or used by Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

67. This permit may be modified, suspended, or revoked for cause. The filing of a request by Permittee for a permit modification, or revocation, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

68. Permittee shall furnish to the Secretary, within a reasonable time, any relevant information which the Secretary may request to determine whether cause exists for modifying, suspending or revoking this permit, or to determine compliance with this permit. Permittee shall also furnish to the Secretary, upon request, copies of records required to be kept by this permit.

69. Permittee shall allow the Secretary, or an authorized representative, upon the presentation of credentials to:

    a. Enter at reasonable times the facility or where records must be kept under the conditions of this permit;

    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

    c. Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under this permit; and

    d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance any substances or parameters at any location.

70. This Certification does not convey any property rights of any sort or any exclusive privilege, nor does it authorize any injury to private property or any invasion of personal rights.

71. This Certification is not alienable, transferable, or assignable.

72. This Certification supersedes any certifications issued previously under 10 V.S.A. §6605 to the Permittee for the Facility.

73. The provisions of this certification are severable, and if any provision of this certification, or the application of any provision of this certification to any circumstance is held invalid, such a determination shall not have any effect on the validity of the remainder of the certification, or on the application of the provision to other circumstances.

74. The Permittee shall maintain compliance with the solid waste management rules and 10 V.S.A. Chapter 159 as amended. The permittee shall modify the certification if a change in the law results in conflict between the permit and newly adopted legal requirement.

Appeal Rights:

Pursuant to 10 V.S.A. Chapter 220, any appeal of this decision must be filed with the clerk of the Environmental Court within 30 days of the date of the decision. The appellant must attach to the Notice of Appeal the entry fee of $225.00 payable to the State of Vermont.

The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Court; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal.

The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings.

The Secretary's issuance of this Certification for the operation of this Solid Waste Management Facility relies upon the data and other information supplied by the Permittee, the hired professional consultants and other experts who have participated in the preparation of the Application. If any information provided to the Agency is found to be false or misleading, this Certification may be subject to revocation or suspension under § 6-307 of the Rules.

The Program makes no assurances that the system certified herein will meet the performance objectives of the operator and no warranties or guarantees are given or implied.

Program staff reviewed the Application and find it to conform with the Vermont Solid Waste Management Rules. It is recommended that the foregoing findings be made and this Certification be issued for the operation of the Solid Waste Management Facility described herein.

I do affirmatively make the findings as recommended by the staff of the Program and approve the issuance of this Certification.

Dated this 18th day of October, 2010 at Waterbury, Vermont.

Justin G. Johnson, Commissioner
Department of Environmental Conservation

By: _____
George Desch, Director
Waste Management Division

Appendix A – NEWSVT Landfill Operating Capacity, Material Acceptance and Storage Limitations

Material Type	Amount Stored On-site	Amount Accepted per Day (tons)	Annual Amounts Accepted (tons)
Wastes for Disposal			
Solid Waste C&D Clean	2000 cy 800cy	2,500	250,000
Tires	20 tons		
Materials Accepted For Recycling			
Fibers and Containers	1 ton	---	---
Appliances, Scrap Metals	1 rolloff	---	---
Lead acid batteries	1 pallet	---	---
Universal waste		---	---
Food Waste		---	---
Electronics		---	---
Stumps/Inert Waste Collection			
Bagged Trash	9 tons		
Untreated Wood		---	---
Leaf and Yard Waste		---	---
HHW and CEG Collection			
HHW/CEG	2 tons	---	---

Engineering Drawings

Financial Assurance

#1927560

STANDBY TRUST AGREEMENT

Standby Trust Agreement, (the "Agreement,") amended as of NOVEMBER 26, 2013 by and between New England Waste Services of Vermont, Inc. ("NEWSVT"), a Vermont corporation, with a place of business at 25 Greens Hill Lane, Rutland, Vermont (the "Grantor"), and KeyBank National Association, a national bank, the "Trustee".

Whereas, the Agency of Natural Resources, "ANR", an agency of the State of Vermont, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a solid waste disposal facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility.

Whereas, the Grantor has elected to satisfy its obligation to provide such financial assurance for the facilities identified herein, by obtaining a Performance Bond and establishing a Standby Trust Agreement, both for the benefit of the State of Vermont.

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee.

Now, therefore, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in the Agreement:

A. The term "Grantor" means the owner or the operator who enters into the Agreement and any successors or assigns of the Grantor,

B. The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.

C. The term "Secretary" means the Secretary of the Vermont Agency of Natural Resources or his/her designee.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facility (the "Facility"), that NEWSVT operates as a double lined landfill on its land and premises located at Airport Road in the Town of Coventry (the "Coventry Landfill"). Current estimates for the cost of the Closure Work total **$6,090,131.50** and Post-Closure Work total **$2,099,226.35.** The cost of the Closure and Post-Closure Work may be revised from time to time as necessary to more accurately reflect actual anticipated costs.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a standby trust fund, (the "Fund"), for the benefit of the State of Vermont. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund will be established by the Trustee. The amount guaranteed under the Performance Bond shall be deposited in the Fund in the event payment is triggered and funds are received by the Trustee. Prior to an event triggering payment, the original Performance Bond will be held by the ANR. A copy of the performance Bond is attached on Attachment B. All deposits

subsequently transferred to the Trustee are referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by the ANR.

Section 4. Payment for Closure and Post-Closure Care. The Trustee shall make payments from the Fund only as the Secretary shall, in his/her sole discretion, direct in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the Secretary from the Fund for closure and post-closure expenditures in such amounts as the Secretary directs in writing. In addition, the Trustee shall refund to the Grantor such amounts as the Secretary specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the Fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

A. Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80A-2(A), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State Government;

B. The Trustee is authorized to hold cash awaiting investment or distribution un-invested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

A. To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions hereof, to be commingled with the assets of other trusts participating therein; and

B. To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 *et seq.*, including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretion conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

A. To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;

B. To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;

C. To register any securities held in the Fund in its own name or in the name of a nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve Bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

D. To deposit any cash in the Fund in interest-bearing accounts maintained or saving certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and

E. To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other reasonable expenses incurred by the Trustee in connection with the administration of the Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper changes and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund; furnish to the Grantor and to the Secretary a statement confirming the value of the Trust. Any securities in the Fund shall be valued at

market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the Secretary, shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the Secretary, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated by the Grantor on the attached Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the Secretary to the Trustee shall be in writing, signed by the Secretary, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or ANR hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from Grantor and/or ANR, except as provided herein. All orders, requests, and instructions are to be sent to the following addresses:

To the ANR: Agency of Natural Resources
Certification & Compliance Section
Solid Waste Management Division
103 South Main St.
Waterbury, VT 05671-0407

To the Grantor: New England Waste Services of Vermont, Inc.
25 Greens Hill Lane
Rutland, VT 05701

To the Trustee: KeyBank National Association
127 Public Square
Mail Code: OH-01-27-0713
Cleveland, OH 44114

Section 15. Notice of Nonpayment. The Trustee shall notify the Grantor and the Secretary, by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the payment period is completed, the Trustee shall not be required to send a notice of nonpayment.

Section 16. Amendment of Agreement. This Agreement may be amended by an instrument in writing by the Grantor, the Trustee, and the Secretary, or by the Trustee and the Secretary if the Grantor ceases to exist and has no successors or assigns.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the Secretary, or by the Trustee and the Secretary, if the Grantor ceases to exist and has no successors or assigns. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the Secretary issued in accordance with this Agreement. The Trustee shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

Section 19. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the State of Vermont.

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each section of this Agreement shall not affect the interpretation of the legal efficacy of this Agreement.

In Witness Whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written:

By Grantor:

NEW ENGLAND WASTE SERVICES OF VERMONT, INC.

Attest Notary

[Seal]

Signature

President + Secretary
Title

By Trustee:

KEYBANK NATIONAL ASSOCIATION

Attest Notary

[Seal]

Signature

Vice President
Title

NOTARIAL SEAL
STATE OF OHIO

ANN MOLSKI
Notary Public, State of Ohio
My Commission Expires
May 8, 2015

ATTACHMENT B

Copy of the Performance Bond Attached

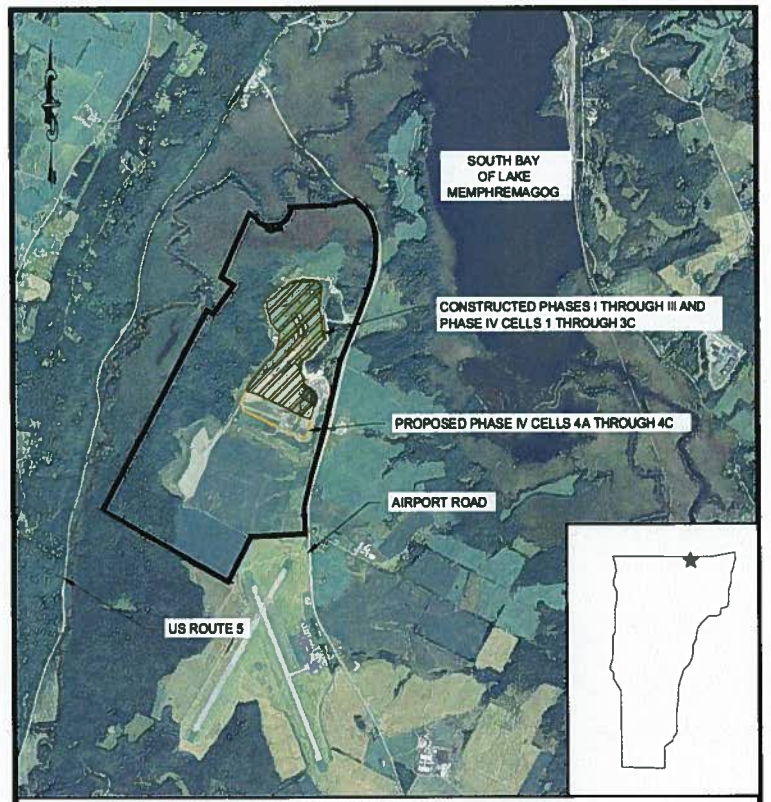
EXHIBIT A.

Designated Persons Empowered by Grantor to give Instructions to the Trustee As Specified in Section 14.

Company and Personal Background Disclosures (provided separately)

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.

COVENTRY, VERMONT
JULY 2014



FROM: THE VERMONT CENTER FOR GEOGRAPHIC INFORMATION- NEWPORT, VERMONT (2011)

LOCUS PLAN

SCALE: 1"=2000'

SHEET INDEX

PREPARED FOR:

NEW ENGLAND WASTE SERVICES OF VERMONT, INC.

NEWSVT

COVENTRY, VERMONT

PREPARED BY:

SANBORN HEAD

2 SOUTH MAIN STREET, SUITE 2, RANDOLPH, VERMONT
(802) 728-2000 FAX (802) 728-9500

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM THE FOLLOWING SURVEY DATA MERGED BY SANBORN, HEAD & ASSOCIATES, INC. (SANBORN HEAD):

   A. TOPOGRAPHY PREPARED USING AERIAL PHOTOGRAMMETRIC TECHNIQUES FOR NEWSVT BY EASTERN TOPOGRAPHICS (ET) OF WOLFEBORO, NEW HAMPSHIRE. TOPOGRAPHY WAS DEVELOPED BASED ON AERIAL PHOTOGRAPHS DATED 10/09/13, 10/8/12, 10/28/11, 10/28/10, 10/19/09, 11/05/08, 11/11/07 AND 11/12/05 AND PROVIDED TO SANBORN HEAD IN DIGITAL FORMAT AT AN ORIGINAL SCALE OF 1" = 40'.

   B. TOPOGRAPHY TO THE EAST OF AIRPORT ROAD WAS PREPARED USING AERIAL PHOTOGRAMMETRIC TECHNIQUES FOR NEWSVT BY ET. TOPOGRAPHY WAS DEVELOPED BASED ON AERIAL PHOTOGRAPHS DATED 05/04/02 AND PROVIDED TO SANBORN HEAD IN DIGITAL FORMAT AT AN ORIGINAL SCALE OF 1" = 40'.

2. THE VERTICAL DATUM IS BASED ON THE NAVD OF 1988 AND THE HORIZONTAL DATUM IS BASED ON THE VERMONT STATE PLANE COORDINATE SYSTEM. THE APPROXIMATE GLOBAL COORDINATES FOR THE SITE ARE: LONGITUDE - W72°14', LATITUDE - N44°54'.

3. WETLANDS SHOWN TO THE NORTH AND WEST OF THE EXISTING LANDFILLS AND TO THE EAST OF THE LFGTE AREA WERE DELINEATED BY ARROWWOOD ENVIRONMENTAL (AE) OF HUNTINGTON, VERMONT IN MAY 2004 AND SURVEYED BY BLAIS SURVEYING COMPANY (BSC), OF NEWPORT, VERMONT. WETLAND INFORMATION WAS PROVIDED TO SANBORN HEAD BY BSC IN DIGITAL FORMAT ON JUNE 10, 2004. ADDITIONAL WETLAND INFORMATION WAS TAKEN FROM THE PHASE IV DESIGN DRAWINGS DATED JUNE 2003 AND PREPARED BY SANBORN HEAD.

4. THE WETLAND DELINEATION WAS FIELD REVIEWED BY AE ON JUNE 8, 2009 WITH THE RESULTANT CHANGE IN THE DELINEATION IN THE BOUNDARY IMMEDIATELY NORTH OF THE WEST DETENTION BASIN. THE BOUNDARY CHANGE WAS SURVEYED BY AE VIA SUBMETER GPS. THE WETLAND DELINEATION BOUNDARY PRESENTED IN THIS AREA HAS BEEN FIELD VERIFIED FOR ACCURACY BY AE AS OF JUNE 8, 2009.

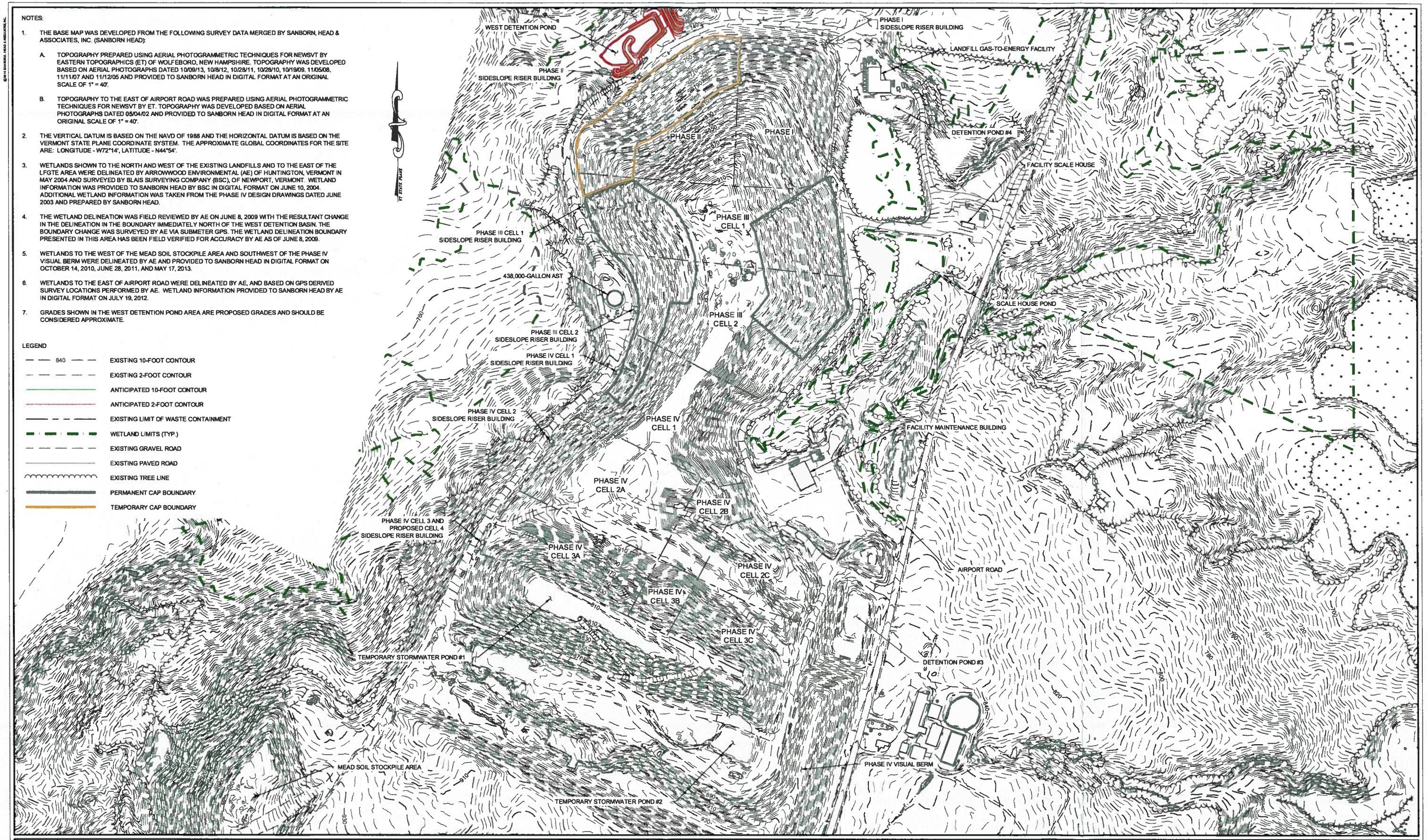
5. WETLANDS TO THE WEST OF THE MEAD SOIL STOCKPILE AREA AND SOUTHWEST OF THE PHASE IV VISUAL BERM WERE DELINEATED BY AE AND PROVIDED TO SANBORN HEAD IN DIGITAL FORMAT ON OCTOBER 14, 2010, JUNE 28, 2011, AND MAY 17, 2013.

6. WETLANDS TO THE EAST OF AIRPORT ROAD WERE DELINEATED BY AE, AND BASED ON GPS DERIVED SURVEY LOCATIONS PERFORMED BY AE. WETLAND INFORMATION PROVIDED TO SANBORN HEAD BY AE IN DIGITAL FORMAT ON JULY 19, 2012.

7. GRADES SHOWN IN THE WEST DETENTION POND AREA ARE PROPOSED GRADES AND SHOULD BE CONSIDERED APPROXIMATE.

LEGEND

- EXISTING 10-FOOT CONTOUR
- EXISTING 2-FOOT CONTOUR
- ANTICIPATED 10-FOOT CONTOUR
- ANTICIPATED 2-FOOT CONTOUR
- EXISTING LIMIT OF WASTE CONTAINMENT
- WETLAND LIMITS (TYP.)
- EXISTING GRAVEL ROAD
- EXISTING PAVED ROAD
- EXISTING TREE LINE
- PERMANENT CAP BOUNDARY
- TEMPORARY CAP BOUNDARY



SANBORN HEAD

GRAPHICAL SCALE
200' 100' 0 200' 400'

NO.	DATE	DESCRIPTION	BY

DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

PROJECT NUMBER: 1166.08

EXISTING CONDITIONS PLAN

SHEET NUMBER: 1 OF 7

NOTES:

1. SEE SHEET 1 FOR ADDITIONAL NOTES AND LEGEND INFORMATION.

LEGEND

- 840 — EXISTING 10-FOOT CONTOUR
- EXISTING 2-FOOT CONTOUR
- 780 — PROPOSED 10-FOOT CONTOUR
- PROPOSED 2-FOOT CONTOUR
- EXISTING LIMIT OF WASTE CONTAINMENT
- WETLAND LIMITS (TYP.)
- EXISTING GRAVEL ROAD
- EXISTING PAVED ROAD
- EXISTING TREE LINE
- PROPOSED EDGE OF GRAVEL ROAD
- PROPOSED LIMIT OF WASTE CONTAINMENT
- PLCP — PROPOSED PRIMARY LEACHATE COLLECTION PIPE
- PS — PROPOSED PRIMARY AND SECONDARY LEACHATE COLLECTION PIPE
- PSCO — PROPOSED PRIMARY AND SECONDARY LEACHATE CLEANOUT PIPE
- EXISTING RIPRAP LINED SWALE
- PROPOSED RIPRAP LINED SWALE

PHASE IV CELL 2 SIDESLOPE RISER BUILDING
PHASE IV CELL 1
PHASE IV CELL 2A
FACILITY MAINTENANCE BUILDING
PHASE IV CELLS 3 AND 4 SIDESLOPE RISER BUILDING
PHASE IV CELL 2B
PROPOSED RIPRAP LINED SWALE
PHASE IV CELL 3A
PHASE IV CELL 2C
PHASE IV CELL 3B
AIRPORT ROAD
DETENTION POND #3
PROPOSED PHASE IV CELL 4A
PHASE IV CELL 3C
PROPOSED TEMPORARY STORMWATER POND
PHASE IV VISUAL BERM
PROPOSED CULVERT
PROPOSED RIPRAP LINED SWALE

SANBORN HEAD

GRAPHICAL SCALE
100' 50' 0 100' 200'

NO.	DATE	DESCRIPTION	BY

DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

PROJECT NUMBER: 1166.08

LANDFILL SEQUENCING PLAN CELL 4A

SHEET NUMBER: 2 OF 7

NOTES:

1. SEE SHEET 1 FOR ADDITIONAL NOTES AND LEGEND INFORMATION.

LEGEND

- 840 — EXISTING 10-FOOT CONTOUR
- EXISTING 2-FOOT CONTOUR
- 780 — PROPOSED 10-FOOT CONTOUR
- PROPOSED 2-FOOT CONTOUR
- EXISTING LIMIT OF WASTE CONTAINMENT
- WETLAND LIMITS (TYP.)
- EXISTING GRAVEL ROAD
- EXISTING PAVED ROAD
- EXISTING TREE LINE
- PROPOSED EDGE OF GRAVEL ROAD
- PROPOSED LIMIT OF WASTE CONTAINMENT
- PLCP — PROPOSED PRIMARY LEACHATE COLLECTION PIPE
- CO — PROPOSED PRIMARY LEACHATE CLEANOUT PIPE
- PS — PROPOSED PRIMARY AND SECONDARY LEACHATE COLLECTION PIPE
- PSCO — PROPOSED PRIMARY AND SECONDARY LEACHATE CLEANOUT PIPE
- EXISTING RIPRAP LINED SWALE
- PROPOSED RIPRAP LINED SWALE
- PREVIOUSLY CONSTRUCTED CELL

PHASE IV CELLS 3 AND 4 SIDESLOPE RISER BUILDING
PHASE IV CELL 2A
PHASE IV CELL 2B
PHASE IV CELL 3A
PHASE IV CELL 2C
PHASE IV CELL 3B
PHASE IV CELL 4A
PHASE IV CELL 3C
DETENTION POND #3
PROPOSED RIPRAP LINED SWALE
PROPOSED RIPRAP LINED SWALE
PROPOSED PHASE IV CELL 4B
3/6
3/7
PROPOSED CULVERTS
PHASE IV VISUAL BERM
PROPOSED RIPRAP LINED SWALE
PROPOSED DETENTION POND #1 FOREBAY
AIRPORT ROAD
PROPOSED DETENTION POND #1 GRADING MODIFICATIONS

SANBORN HEAD

GRAPHICAL SCALE
100' 50' 0 100' 200'

NO.	DATE	DESCRIPTION	BY

DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

LANDFILL SEQUENCING PLAN
CELL 4B

PROJECT NUMBER: 1166.08

SHEET NUMBER: 3 OF 7

PHASE IV CELLS 3 AND 4 SIDESLOPE RISER BUILDING

PHASE IV CELL 2A

PHASE IV CELL 2B

PHASE IV CELL 3A

PHASE IV CELL 2C

PHASE IV CELL 3B

PHASE IV CELL 3C

PHASE IV CELL 4A

PHASE IV CELL 4B

PROPOSED PHASE IV CELL 4C

PROPOSED RIPRAP LINED SWALE

PROPOSED GRASS LINED SWALE

PHASE IV PERIMETER ACCESS ROAD

PHASE IV VISUAL BERM

DETENTION POND #1

DETENTION POND #3

LIMIT OF COMPACTION

AIRPORT ROAD

NOTES:

1. SEE SHEET 1 FOR ADDITIONAL NOTES AND LEGEND INFORMATION.

LEGEND

- 840 — EXISTING 10-FOOT CONTOUR
- EXISTING 2-FOOT CONTOUR
- 780 — PROPOSED 10-FOOT CONTOUR
- PROPOSED 2-FOOT CONTOUR
- EXISTING LIMIT OF WASTE CONTAINMENT
- WETLAND LIMITS (TYP.)
- EXISTING GRAVEL ROAD
- EXISTING PAVED ROAD
- EXISTING TREE LINE
- PROPOSED LIMIT OF WASTE CONTAINMENT
- PROPOSED LIMIT OF COMPACTION
- PLCP — PROPOSED PRIMARY LEACHATE COLLECTION PIPE
- CO — PROPOSED PRIMARY LEACHATE CLEANOUT PIPE
- PS — PROPOSED PRIMARY AND SECONDARY LEACHATE COLLECTION PIPE
- PSCO — PROPOSED PRIMARY AND SECONDARY LEACHATE CLEANOUT PIPE
- EXISTING RIPRAP LINED SWALE
- PROPOSED RIPRAP LINED SWALE
- PROPOSED GRASS LINED SWALE
- PREVIOUSLY CONSTRUCTED CELL

SANBORN HEAD

GRAPHICAL SCALE
100' 50' 0 100' 200'

NO.	DATE	DESCRIPTION	BY

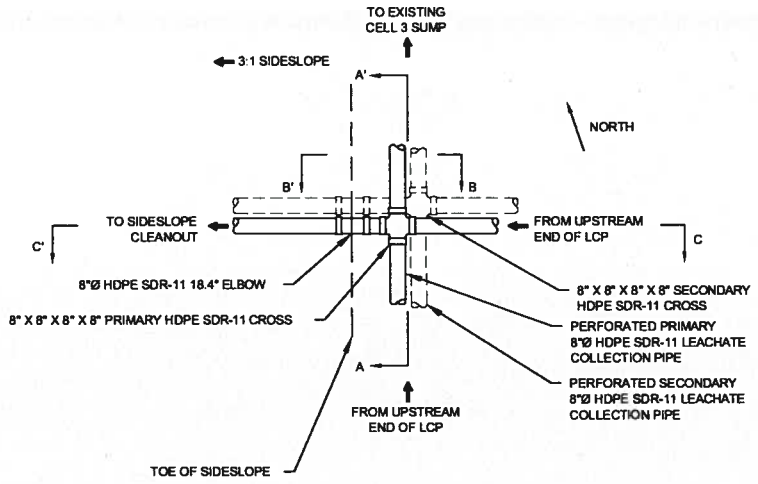
DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

LANDFILL SEQUENCING PLAN
CELL 4C

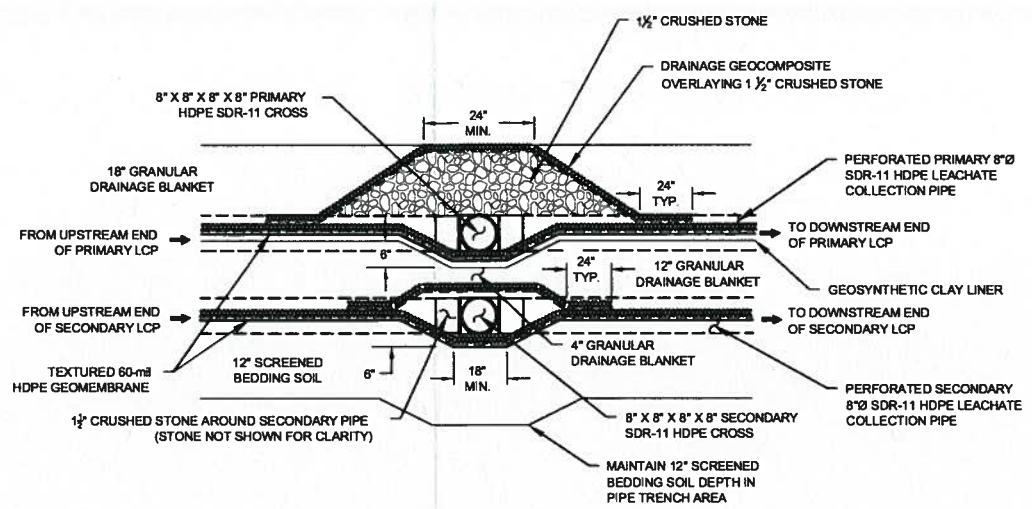
PROJECT NUMBER: 1166.08

SHEET NUMBER: 4 OF 7

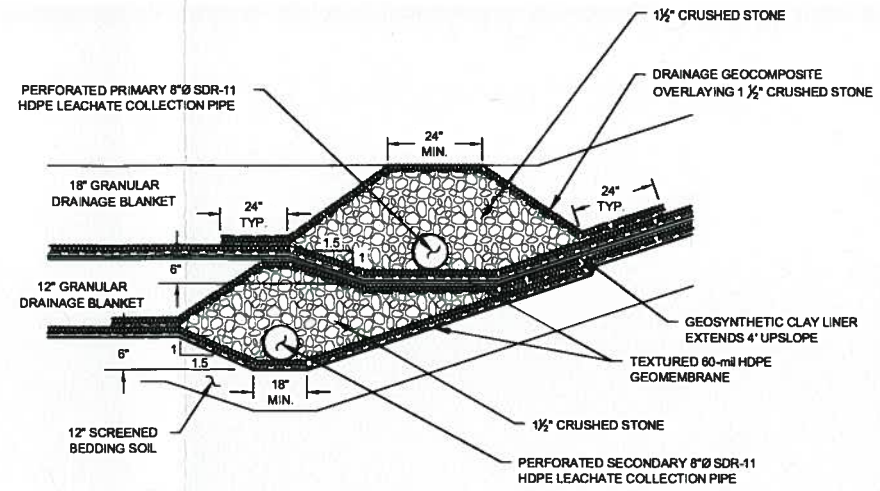


1 LEACHATE COLLECTION PIPE CROSS DETAIL

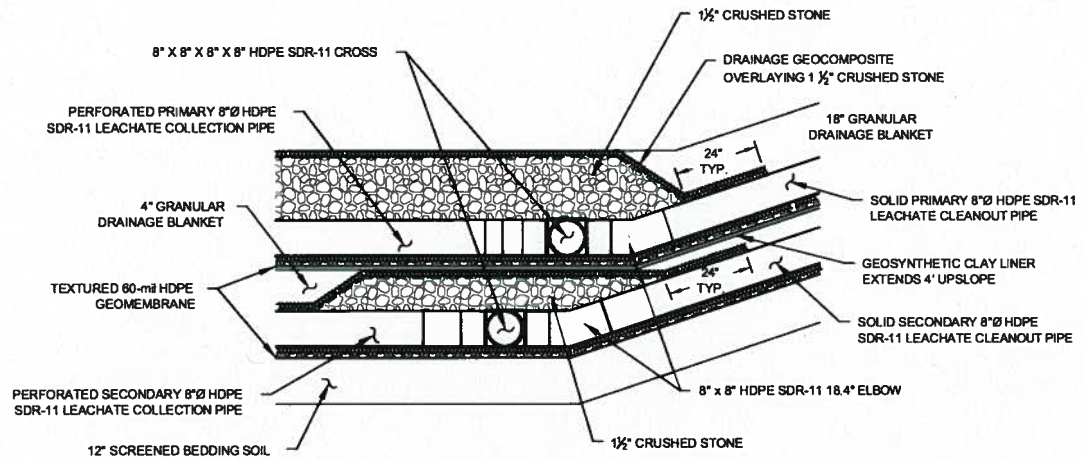
NOT TO SCALE



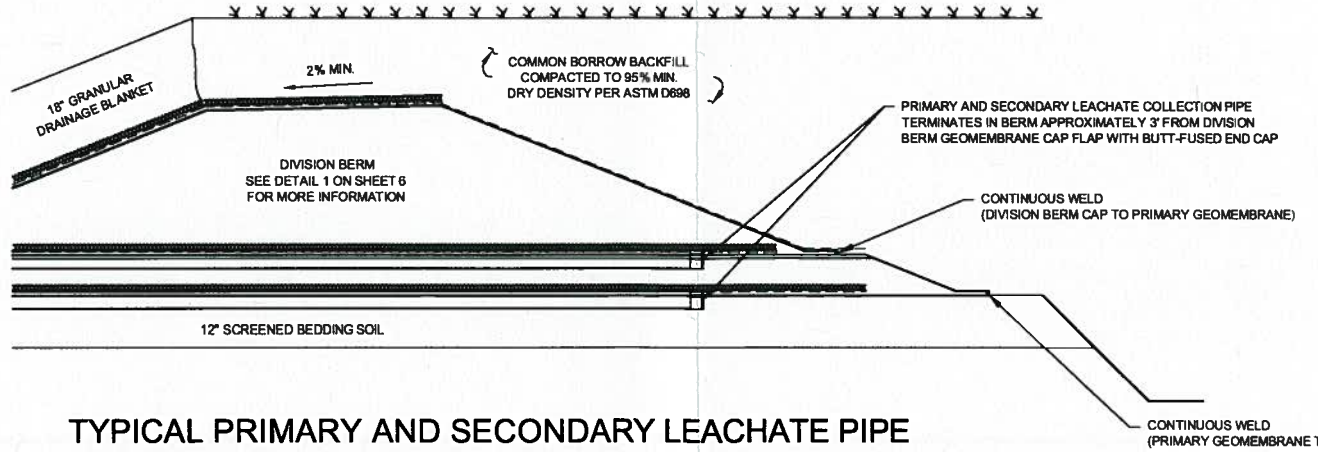
SECTION A-A'



SECTION B-B'



SECTION C-C'



2 TYPICAL PRIMARY AND SECONDARY LEACHATE PIPE TERMINATION LOCATION DETAIL

NOT TO SCALE

SANBORN HEAD

GRAPHICAL SCALE AS NOTED

NO.	DATE	DESCRIPTION	BY

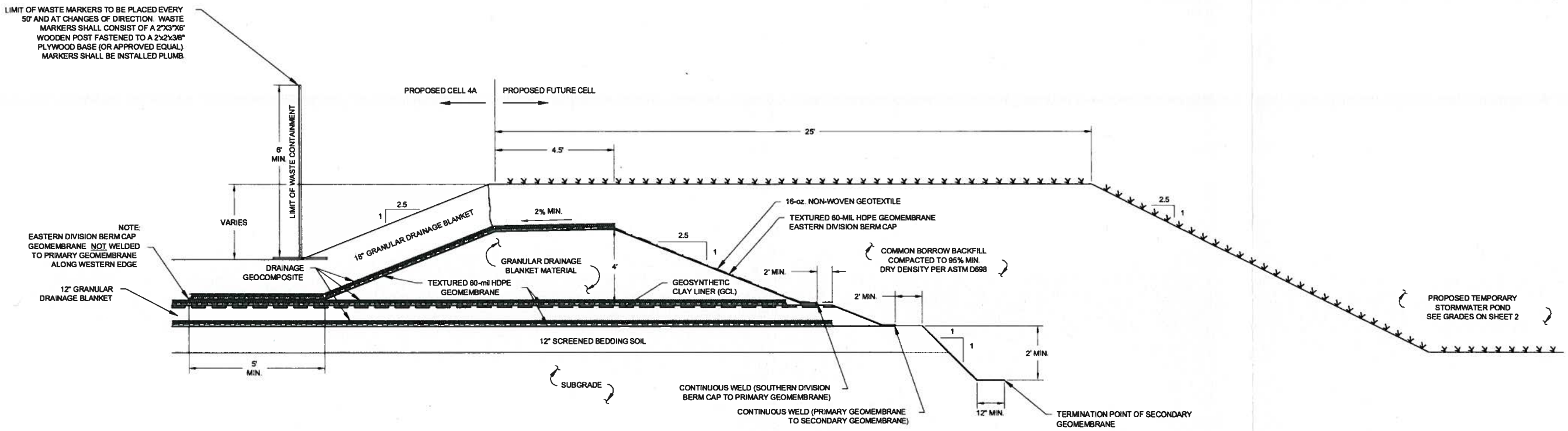
DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

LEACHATE COLLECTION PIPING DETAILS

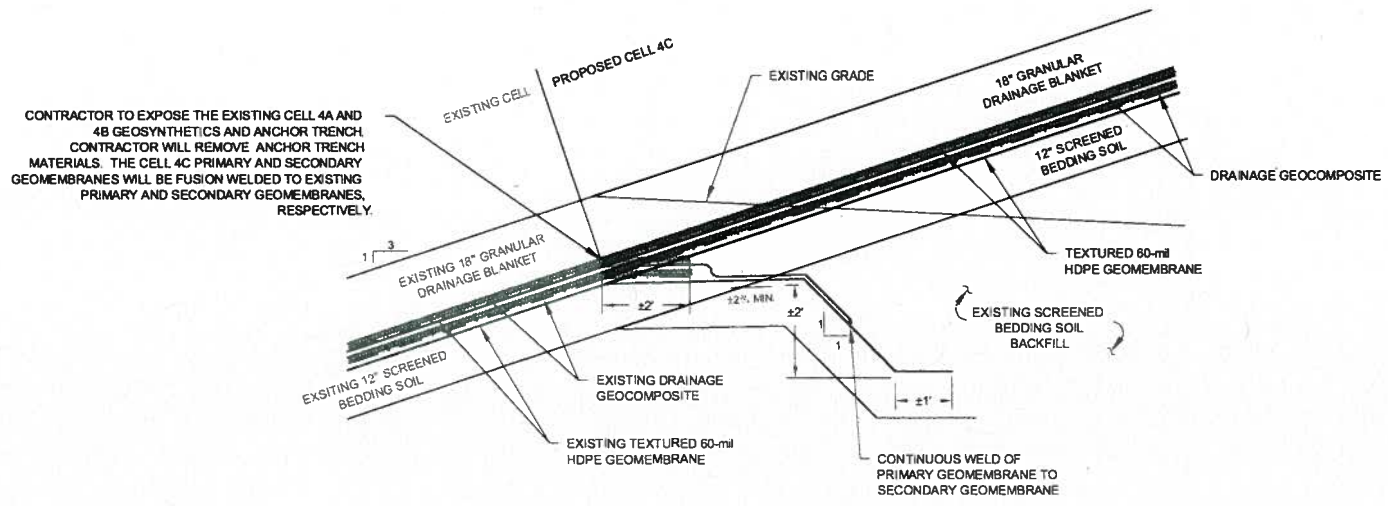
PROJECT NUMBER: 1166.08

SHEET NUMBER: 5 OF 7



1 CELL 4A EASTERN DIVISION BERM DETAIL

NOT TO SCALE

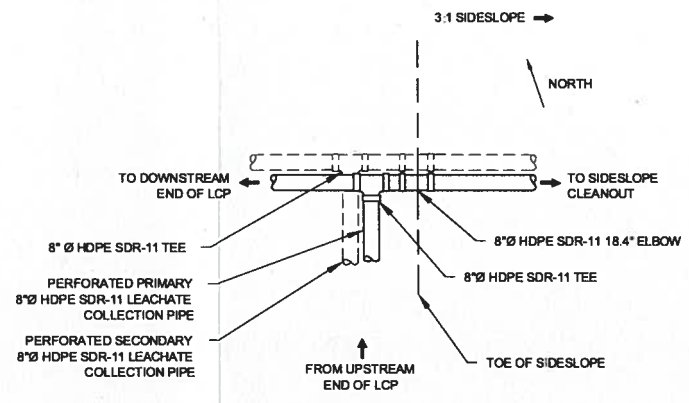


NOTE:

1. SUBGRADE COMPACTED TO AT LEAST 95% MAXIMUM DRY DENSITY PER ASTM D698 WITHIN LIMIT OF COMPACTION. SEE SHEET 4 FOR LIMIT OF COMPACTION.

2 CELL 4C LINER SYSTEM EXTENSION DETAIL

NOT TO SCALE



3 LEACHATE COLLECTION PIPE CONNECTION DETAIL

NOT TO SCALE

SANBORN HEAD

SCALE AS INDICATED

NO.	DATE	DESCRIPTION	BY

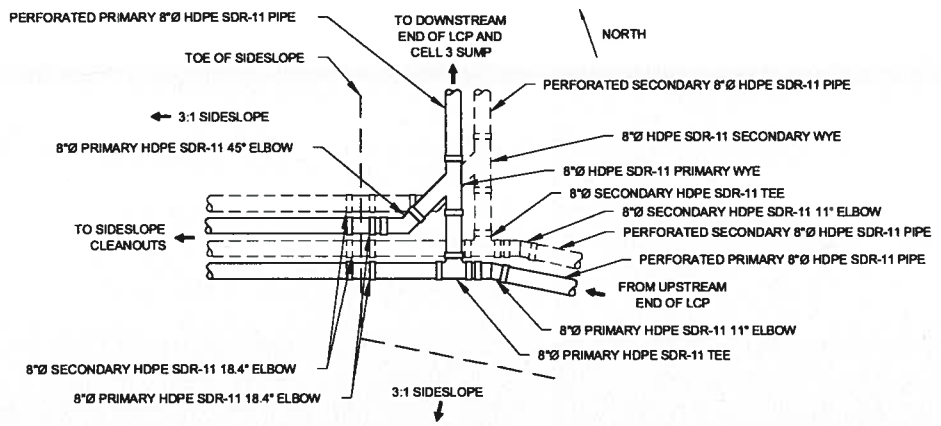
DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

PROJECT NUMBER: 1166.08

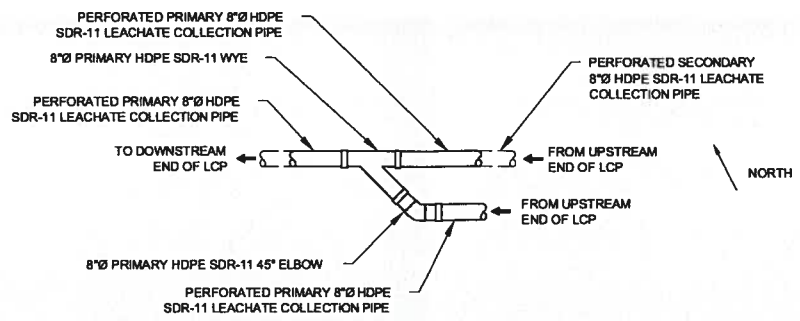
LEACHATE COLLECTION SYSTEM DETAILS

SHEET NUMBER: 6 OF 7



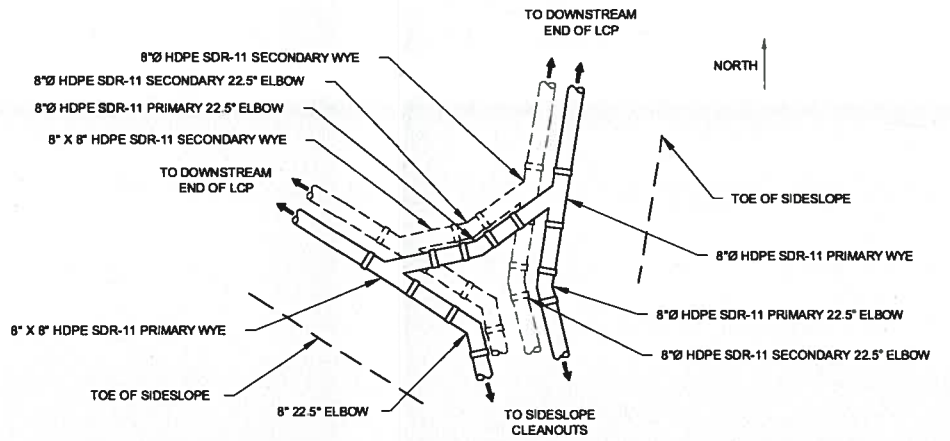
1 PRIMARY AND SECONDARY SOUTHWEST CORNER DETAIL

NOT TO SCALE



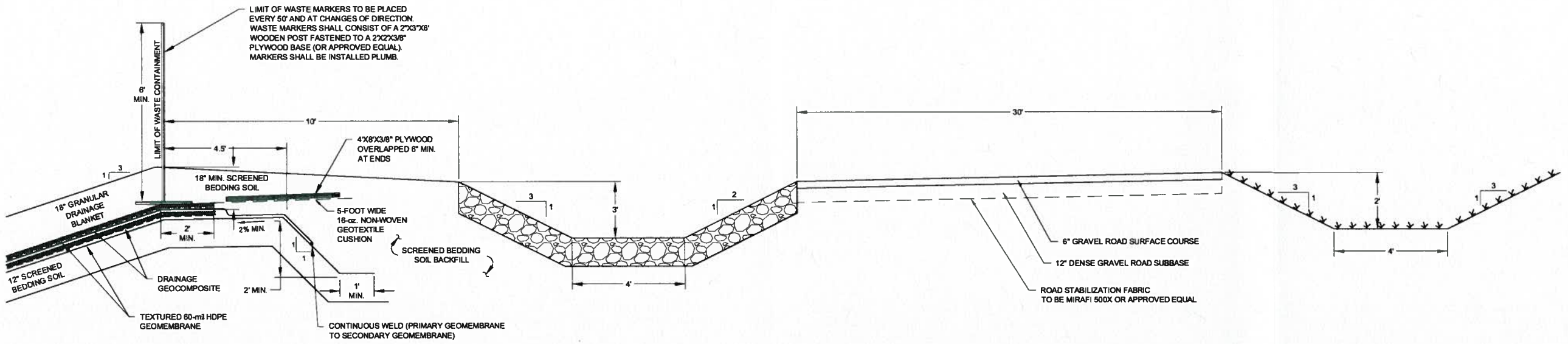
2 PRIMARY AND SECONDARY NORTHERN CONNECTION DETAIL

NOT TO SCALE



3 PRIMARY AND SECONDARY SOUTHEAST CORNER DETAIL

NOT TO SCALE



NOTE:

1. SUBGRADE COMPACTED TO AT LEAST 95% MAXIMUM DRY DENSITY PER ASTM D698 WITHIN LIMIT OF COMPACTION. SEE SHEET 4 FOR LIMIT OF COMPACTION.

4 TYPICAL PERIMETER SWALE AND ACCESS ROAD DETAIL

NOT TO SCALE

SANBORN HEAD

SCALE AS INDICATED

NO.	DATE	DESCRIPTION	BY

DRAWN BY: M. HILDENBRAND
DESIGNED BY: M. HILDENBRAND
REVIEWED BY: R. SHILLABER/B. BEAUDOIN
PROJECT MGR: T. PETIT
PIC: B. BEAUDOIN
DATE: JULY 2014

FACILITY RECERTIFICATION
NEW ENGLAND WASTE SERVICES OF VERMONT, INC.
COVENTRY, VERMONT

LEACHATE COLLECTION SYSTEM AND PERIMETER ACCESS ROAD DETAILS

PROJECT NUMBER: 1166.08

SHEET NUMBER: 7 OF 7