PROJECT OPERATIONS PLAN – APPENDIX B

TRANSPORTATION AND DISPOSAL PLAN FOR THE POWERHOUSE DECONSTRUCTION

PROJECT

HUDSON FALLS POWERHOUSE DECONSTRUCTION
HUDSON FALLS, WASHINGTON COUNTY, NY

CLIENT

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Original Submittal: September 29th, 2022
Revised Submittal: November 10th, 2022
Revised Submittal: November 16th, 2022
Revised Submittal: November 29th, 2022

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1.0 Introduction

Sessler has been authorized to perform the deconstruction and removal of the former powerhouse, and all waste generated from these activities will be disposed of at off-site Environmental Protection Agency – (EPA-) approved locations. This Transportation and Disposal (T&D) Plan applies to all wastes generated from the activities performed as a part of the deconstruction activities of the project. All wastes will be managed in compliance with the Powerhouse Deconstruction Design Report (RAD), Environmental Monitoring and Protection Measures Work Plan (EMPM Work Plan), and applicable federal and state regulations, including EPA's Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Off-Site Rule (OSR). This T&D Plan includes the identification of the proposed disposal facilities for all waste streams and include waste profile information, facility acceptance and analytical requirements for each waste stream, and estimated waste stream volumes, which will also be shown on the EPA's OSR form submitted for each waste stream. In addition, this T&D Plan will include the following information, which shall be provided to the EPA Project Coordinators prior to shipping any hazardous waste off the Site:

- The valid Resource Conservation and Recovery Act (RCRA) transporter and disposal identification numbers for each transporter and disposal company.
- The most recent six-month State or EPA regulatory inspection results of each disposal company.
- Documentation of the current permit status of proposed disposal facilities.
- The date of the most recent State or EPA regulatory inspection, and any special provisions or conditions attached to the RCRA disposal permits as a result of the most recent inspection.
- The names and addresses of all off-site waste treatment, storage, or disposal facilities selected to receive Waste Material from the Site. Notification (OSR form) will be given to EPA for approval at least 14 days prior to off-Site shipment of such wastes. Following the ultimate disposal of Waste Material, EPA will be provided with valid Certificates of Disposal from the disposal facilities used for all waste shipped off-Site. If off-site shipment of waste is anticipated past the 60-day EPA determination of facility CERCLA OSR compliance, the OSR form will be resubmitted at least 3 weeks prior to the determination expiration date.

After permitted disposal facilities have been identified, all wastes shall be properly manifested and shipped off-site via permitted transporters, and thereafter copies of all final signed manifests, bills of lading, and certificates of destruction or disposal will be provided to the EPA Project Coordinators as part of the final report.

Additionally, Arcadis (Tom Carey) will serve as the on-site point of contact regarding waste management (including tracking) for EPA.

This document establishes the framework to propagate programmatic strategies for managing waste from initial generation through final disposal. This plan addresses the following:

- Pollution prevention.
- Segregation.
- Waste minimization methods.
- Waste generation forecasts.
- Point of generation controls.
- Staging and storage requirements.
- Transportation and disposal requirements.

Sessler shall, in coordination with Arcadis, characterize waste in accordance with the applicable regulations, profile and procedure requirements, the EMPM Work Plan, and the applicable disposal facility Waste Acceptance Criteria (WAC).

Additional sampling and laboratory analysis will be performed as necessary when existing information (such as existing data) is inadequate to make an accurate waste determination. Sorting, segregation, and

decontamination techniques will be performed per the RAD, to the extent practical to minimize the amount of regulated waste, as defined by RCRA and Toxic Substances Control Act (TSCA), that would require regulated off-site transportation and disposal.

Three general waste types may be generated on this project: 1) building materials that are not contaminated; 2) building materials that may have been impacted by Hudson Falls Site contaminants (HF Contaminants) and 3) building materials that may have been contaminated as a result of historic Powerhouse operations (non-HF contaminants), as determined by sampling. Material management based on polychlorinated biphenyl (PCB) sampling is outlined below:

- Non-Contaminated Materials: Visibly clean building materials located above grade will be managed separately from building debris suspected to be contaminated. It is anticipated that in-situ sampling will be conducted for non-contaminated materials, to the extent possible. These materials will be stockpiled and sampled to confirm that disposal at the EPA-approved non-TSCA disposal facility is appropriate.
- Materials suspected to have been impacted by HF Contaminants: Materials suspected to be impacted by HF contaminants will be managed separately from the remaining building debris and the stockpiles sampled to assess potential impacts. As a conservative approach, HF Contaminated materials that contain polychlorinated biphenyls (PCBs) at or above 25 milligrams per kilogram (mg/kg) (rather than 50 mg/kg) will be identified for disposal at a TSCA-regulated waste disposal facility.
- Materials suspected to have been impacted by non-HF Contaminants: Materials suspected to be contaminated will be managed separately from the remaining building debris and the stockpiles sampled to assess potential impacts. Building materials from portions of the building that are suspected to be impacted by non-HF Contaminants that contain PCBs at or above 25 ppm will be identified for disposal at a TSCA-regulated waste disposal facility.

Based on sampling and analysis, if deconstruction debris and/or generated wash waters are determined to be TSCA regulated hazardous waste, the waste will be managed on-site by Sessler for the Respondents and disposed of at an EPA-approved facility for TSCA regulated hazardous waste. As noted previously in this section, Arcadis will serve as the on-site point of contact regarding waste management (including tracking) for EPA.

Refer to Sections 5.2 through 5.5, and 6.0 for additional information regarding waste characterization, segregation, and sampling.

2.0 Purpose and Scope

The purpose of this T&D Plan is to provide a systemic approach to the management of waste generated on the Hudson Falls Powerhouse Deconstruction Project that is designed to protect the health and safety of the worker, the public, and the environment. The T&D Plan provides an overall strategy for how waste management activities will be implemented for all primary and secondary wastes generated by the deconstruction of the former powerhouse. The T&D Plan will identify all types of solid and liquid waste streams expected to be generated, as well as the corresponding off-site disposal facilities needed to properly dispose of the waste. In addition, the T&D Plan describes the proper management of waste streams from generation to disposal, including characterization and segregation, to meet the applicable disposal facility WAC.

Additionally, the T&D Plan identifies the requirements for managing all building deconstruction debris and other materials that complies with regulatory requirements and minimizes comingling of debris with materials potentially impacted by Hudson Falls site contaminants (HF Contaminants) that may be regulated under TSCA. The plan identifies the compliance drivers (codes, standards, laws, and

regulations), organizational responsibilities, waste types, and specific elements that must be addressed during preplanning, generation, management, and off-site transportation and disposal.

3.0 Codes, Standards, Laws, and Regulations

Unless indicated otherwise, the following codes, standards, laws, and regulations establish the minimum requirements for waste management and transportation related activities:

- 29 CFR 1910, Occupational Safety and Health Standards
- 29 CFR 1926, Safety and Health Regulations for Construction
- 40 CFR 261.3, 264, 265, Resource Conservation and Recovery Act
- 40 CFR 761, Polychlorinated Biphenyls
- 40 CFR 300.440, Procedures for Planning and Implementing Off-Site Response Actions
    - Comprehensive Environmental Response, Compensation, and Liability Act Off-Site Rule
- 40 CFR Part 273, Standards for Universal Waste Management
- 15 U.S.C. 2601, Toxic Substances Control Act
- 49 CFR 171.8, Transportation, Definitions, and Abbreviations
- 6 NYCRR 360, Solid Waste Management Facilities General Requirements
- 6 NYCRR 364, Waste Transporter Permits
- 6 NYCRR 370, Hazardous Waste Management System
- 6 NYCRR 371, Identification and Listing of Hazardous Wastes
- 6 NYCRR 372, Hazardous Waste Manifest System and Related Standards for Generators, Transporters, and Facilities
- 6 NYCRR 373, Hazardous Waste Management Facilities
- 6 NYCRR 374, Management of Specific Hazardous Wastes
- 6 NYCRR 375, Environmental Remediation Programs
- 6 NYCRR 376, Land Disposal Restrictions

4.0 Responsibilities

The implementation of Sessler's T&D Plan will be the responsibility of all personnel performing work under this plan. Work procedures and processes are designated to minimize waste generation to the maximum extent practical. All Sessler team personnel and Sessler subcontractors are required to comply with this T&D Plan and other applicable Sessler and Client documents. Entity specific responsibilities are provided below:

- EPA – Lead regulatory agency
    - Provide project oversight and review CERCLA OSR compliance.
- New York State Department of Environmental Conservation (NYSDEC) – HF Plant State Superfund site regulator
    - Provide project oversight as needed, with a focus on activities that may lead to encountering HF Contaminants.
- Respondents (National Grid and General Electric [GE]) – Generator(s)
    - Act as Generator(s) for all wastes generated at the site. It is anticipated that National Grid will serve as the Generator for non-TSCA waste, and GE will serve as the Generator for TSCA characterized waste determined impacted by HF Contaminants.
        - As deconstruction progresses, if PCBs are found in building materials which are not in contact with the bedrock, Respondents will identify the appropriate generator for such material.
    - Review and sign waste manifests/bills of lading or authorize the Engineer to sign manifests (on National Grid's behalf).
    - Review hazardous waste manifests (if any) and other waste shipping documents prior to shipment to confirm accuracy and completeness.

- Arcadis – Engineer
  - Serve as the overall coordinator and main point of contact for EPA regarding management of site waste by Sessler.
  - Review and sign waste manifests/bills of lading (as an authorized agent for National Grid)
  - Maintain on-site project log containing manifests/bills of lading for wastes generated by deconstruction activities.
- Sessler – Contractor
  - Sampling and analysis of all deconstruction debris materials from the former Powerhouse to meet disposal facility and EPA requirements.
  - Segregating, sizing, and staging recyclable material and equipment for loading and transportation.
  - Segregating, handling, sizing, staging, managing and loading-out all materials for offsite transportation and disposal.
  - Creating waste profiles for non-TSCA waste.
- Waste Transporter
  - Transport wastes to EPA-approved disposal facilities in accordance with all Federal or State regulations.
  - Transport wastes in vehicles with current New York State (NYS) Waste Transporter Permits.
  - Driver to sign applicable manifest as Transporter prior to leaving site.
- Waste Disposal Facilities
  - Maintain OSR compliance.
  - Provide Sessler or Generator, depending on the waste stream being managed, copies of required facility records (i.e., inspections, permits, etc.).
  - Provide Sessler or Generator, depending on the waste stream being managed, with certificates of disposal, counter-manifests, and weight tickets. Sessler shall submit all documentation received to the Generator.

5.0 Waste Generation Planning and Forecasting

Waste forecasting is the process by which waste volume estimates are derived for each waste type to support the development of an anticipated shipment schedule and quantity to off-site disposal facilities. Waste forecasts will be developed to show anticipated waste generation rates by waste type throughout the entire project period and will be updated as needed.

Proper management of waste to minimize co-mingling of different waste streams will be a high priority during the project. Upon generation, Sessler will implement the following deconstruction debris management process.

- Collaborate with Arcadis to estimate initial waste volumes/weight in order to plan for adequate on-site support within the temporary upland material staging areas (MSAs) as well as to plan for the required number of samples to meet the disposal facility and EPA requirements.
- Segregation at the point of deconstruction to minimize cross contamination of anticipated waste streams. This segregation process will consider the technical design documents and available characterization data. In addition, visual observation of the building materials (prior to or during their removal) will be performed to identify areas that may be contaminated (e.g., presence of oil and/or staining). Such areas will be considered for separate staging and characterization, pending review and discussion with EPA.
- On-site consolidation at the area of initial loading as well as within the upland MSAs.
- Proper management of the MSAs by use of 10-mil fiber reinforced plastic sheeting and weighted down with sandbags in order to minimize the amount of precipitation accumulation within the waste stream piles.
- Non-TSCA waste shall be loaded out and transported to EPA-approved disposal facilities (manifests anticipated to be signed by Arcadis on behalf of National Grid as the Generator).

- TSCA regulated waste shall be loaded out and transported to EPA-approved disposal facilities.

5.1 Waste Generation Planning

Work will be planned, authorized, and accomplished under controlled conditions, using work plans, instructions, and procedures commensurate with the complexity and risk of the work. Processes important to waste disposition activities (e.g., characterization) shall have controls or verification steps identified as part of operating procedures. Controls will be established to ensure the traceability of the waste from the point of generation through final disposal by use of standard Non-Hazardous and/or Hazardous Uniform Waste Manifests (e.g., similar to EPA Form 8700-22, Rev. 12-17).

5.2 Anticipated Waste Streams

The following sections provide general descriptions of the waste streams that may be generated during the deconstruction activities.

5.2.1 Non-Friable ACM C&D Debris

Non-friable asbestos containing material (ACM) construction and demolition (C&D) debris is anticipated to be limited to roof flashing around parapet walls as well as applicable personal protective equipment (PPE) that will be utilized during the deconstruction process. The materials shall be removed in quantities and locations as identified in the asbestos survey. The non-friable ACM debris will be placed into regulated shipping containers (e.g., 30-cubic yard [cy] capacity roll-off containers) then transported off-site for direct delivery to an approved regulated NYSDEC Part 360 Landfill for disposal.

The non-friable ACM roof flashing material identified in the RAD will not require additional sampling since the sampling conducted by Arcadis satisfies the disposal facility's requirements. Based on the existing asbestos survey report and observations made during the deconstruction project to date, no other suspect ACM has been identified. The estimated quantity for non-friable ACM is 10-15 tons, depending on the amount of brick removed during abatement. Should additional suspect ACM be identified, samples of the suspect material will be collected and submitted for laboratory analysis. The material will then be handled based on the sample results. As an alternative, the material may be handled as if it is ACM without the collection of samples. Under this alternative approach, the material would be handled and disposed of consistent with the requirements of NYSDOL Code Rule 56.

5.2.2 Non-TSCA Materials

The majority of the former powerhouse structure extends above the surrounding grade and is not in direct physical contact with the bedrock or existing soils; as such, these materials are unlikely to have been historically impacted by HF Contaminants. Materials potentially impacted by HF Contaminants are depicted in the RAD. The materials not potentially impacted by HF Contaminants predominantly consist of above grade materials and are assumed likely to be non-TSCA, unless laboratory analytical data indicates otherwise or visible impacts that have not been tested are encountered. The Powerhouse structure is also not anticipated to have been contaminated by process-related activities. For these reasons and consistent with the RAD, the following portions of the structure will be considered non-TSCA materials, unless there is evidence of staining and/or sampling and analysis proves otherwise:

- Parapet walls and elevator (hoist) shaft walls.
- Concrete roof deck.
- Elevated first floor concrete slab up to +/- 1-feet (ft) from the existing contours of the north and south banks as well as eastern wall alignment.
- Eastern wall from the bottom of the eastern raceway gravity wall (located below existing grade) and above.
- Entire west wall including knee wall down to the top of the lower floor slab.
- Northern and southern walls up to from +/- 1 ft above existing grade, of which is irregular along north and south banks.

Sessler shall attempt to pre-sample (i.e., in-situ sample) the above grade, anticipated non-TSCA materials prior to the select demolition, of which shall be dependent on safe access. Should pre-sampling not be feasible, above grade materials will be removed and consolidated by Sessler in the upland non-TSCA MSA for further sampling and analysis to meet the end disposal facility requirements, or as required by EPA, as noted in Section 6.1.2. Additionally, Level D PPE that was utilized during the deconstruction process for this anticipated waste stream will be included within the waste stream. Refer to Sessler's Site Specific Health and Safety Plan (SSHASP) for additional PPE details.

If any above grade material shows evidence of staining, and if in-situ sampling is not feasible, it will be segregated in the TSCA MSA for further sampling (described below in Section 5.2.3). If in-situ sampling is feasible (discussed below in Section 6.1.1) deconstruction of the stained areas will not begin until review of the sampling results and the material is characterized.

The project anticipates approximately 600-cy (in-situ), which correlates to approximately 1,010-tons, of material to be removed, transported, and disposed of as non-TSCA regulated debris.

Refer to Attachment 1, Drawing 22-3100-23 for approximate portions of the structure to be considered above grade, non-TSCA materials.

5.2.3 TSCA Regulated Materials

As mentioned above in Section 1.0, as a conservative approach, the Project set a threshold of any material containing PCB concentrations greater than or equal to 25 mg/kg to be handled as TSCA regulated hazardous waste. Other chemicals of concern will be evaluated by Arcadis against RCRA requirements upon review of Sessler's analytical data. PCBs are the primary constituent of interest with respect to off-site disposal considering TSCA (40 CFR 760) and similar state regulations. Other constituents of interest (e.g., volatile organic compounds [VOCs], semi-volatile organic compounds [SVOCs], and inorganics) may be present as potentially hazardous waste by characteristic in the materials but are unlikely to prompt additional disposal requirements (beyond those required for PCBs) under RCRA (40 CFR 264) and similar state regulations. Ultimately, the sampling results will determine if the waste is handled as non-TSCA or TSCA.

Materials Potentially Impacted by non-HF Contaminants:
Should the results of Sessler's sampling and analysis of the materials not suspected to have come in contact with HF Contaminants, as described above in Section 5.2.2, prove to be hazardous as regulated by TSCA or RCRA, the material will be placed in the designated TSCA MSA (or other designated on-site MSA with concurrence from USEPA) and transported to the EPA-approved facility.

Should in-situ analyses confirm presence of TSCA regulated materials, assuming the contaminated area is contained within the limits of the observed staining, Sessler shall delineate the area with surveyor pink spray paint. The area will include the impacted area in its entirety, as well as material (i.e., brick or concrete) extending at least 1 ft outward from the visually impacted area. The limits of TSCA contaminated structure/building material may be expanded based on visual observation or sampling and the deconstruction progresses.

Materials Potentially Impacted by HF Contaminants:
PCB-containing dense non-aqueous phase liquid (DNAPL) is present within the bedrock near the former Powerhouse, as evidenced by the observation of DNAPL accumulations at existing recovery well RW-104 (located approximately 20 ft east of the structure) as well as in focused bedrock investigations performed in this area in 2021 by GE. As a result, below grade materials may be impacted by HF Contaminants.

Due to the current state of the Powerhouse, pre-deconstruction characterization of building materials at-

and below-grade has not been performed, and it will be assumed that the portions of the structure potentially impacted by HF Contaminants (as depicted in the RAD and consisting of below grade materials with the exception of the materials adjacent to the Eastern Raceway gravity wall) will be handled as potentially TSCA regulated material.

As outlined in the EMPM Work Plan, the above materials will be managed as a separate waste stream, including their removal and placement in a dedicated MSA. In-situ sampling (discussed under Section 6.1.1) is not anticipated for building materials suspected to be impacted by HF Contaminants unless in-situ sampling would be beneficial based on field conditions during deconstruction or as otherwise agreed to by EPA and the Respondents. Such materials will be placed on the potential TSCA MSA for waste characterization sampling. The EMPM Work Plan provides additional discussion regarding the means, methods, and related activities associated with the deconstruction of this portion of the building and the management of the deconstruction debris. Within the MSA, the materials will be subject to characterization to determine appropriate off-site disposal location(s). Because the lower building portions may be impacted by HF Contaminants present in the exterior portion of the building walls (i.e., in contact with bedrock and soils), potential impacts may not be visually observed from the interior of the building. Therefore, during the removal of these portions of the building, the condition of the debris will be closely monitored for indications of HF Contaminant impacts. If there is evidence of contaminated debris as the deconstruction activities advance, such materials will be managed separately and not combined with other debris potentially impacted with HF Contaminants to minimize the co-mingling with less-impacted materials from this area.

We anticipate approximately 340-cy (in-place), below grade debris from walls will be removed, managed, and disposed as TSCA-regulated debris (as appropriate based on sampling data).

Refer to Attachment 1, Drawing 22-3100-23 for approximate portions of the structure to be considered below grade, potential TSCA regulated materials.

5.2.4 Non-TSCA Soil

Sampling of the soil on the existing concrete “apron” connected to the former powerhouse identified low concentrations of PCBs at approximately 7 mg/kg of PCB’s (or approximately 7- parts per million [ppm] PCBs). These soils were removed during exploratory activities to allow Sessler to confirm the exact location and dimensions of the raceway wall in order to properly stage the cranes per Sessler’s NYS Professional Engineer’s (PE’s) stamped design.

Additionally, Sessler excavated a trench, approximately 8”x18”x34’ between the existing combined sewer overflow (CSO) and the crane staging area expose the CSO and eliminate the potential for CSO failure as a result of overburden pressure created by crane loading.

In addition, soils and bedrock that are removed adjacent to the structure (possibly for safety, access, or site restoration purposes) are also presumed to contain HF Contaminants unless pre-removal characterization data is available to demonstrate otherwise.

Finally, during the project, certain materials may be managed as potentially impacted by HF Contaminants based on monitoring, observations, or other considerations during the project.

Once the assumed non-TSCA soils are consolidated by Sessler in the upland MSAs, additional sampling and analysis will be performed by Sessler to meet the end disposal facility and EPA requirements as noted in Section 6.0. Additionally, Level D PPE that was utilized during the soil removal process for this anticipated waste stream will be included. Refer to Sessler’s SSHASP for additional details.

For ground intrusive work under Intrusive Work Permits #1 and #2 (Attachment A1 of the SCP), the Project anticipates generating approximately 35-cy of non-TSCA soil; and up to 200-cy for overall Project.

5.2.5 Equipment, Metals, and Other Recyclables

Sessler will recycle office trash to include, but not limited to paper, plastic, aluminum cans, printer cartridges, etc. These items will be placed in designated locations/containers located on the project site. When sufficient quantities have been collected, they will be transported to a local recycling agency.

All equipment, ferrous and non-ferrous metals will be visually inspected for staining or presence of oils. PCB wipe sampling shall be performed as needed based on visual inspection. Refer to **Section 6.2.5** for additional details on sampling.

All equipment, ferrous and non-ferrous materials shall be disposed at an EPA-approved facility.

The Site estimates a quantity of +/- 280-tons based on the following:

- Powerhouse Roof Steel Beams/Girders (11 beams at 50 feet each, encased in concrete; 1 girder 70 feet long).
- Powerhouse First Floor Steel Beams (7 beams at 50 feet each [spanning east-west]; 8 beams at 70 feet each [spanning north-south]; each is encased in concrete).
- Powerhouse Steel Columns (Main Floor to Ceiling) (2 elevator hoist columns at 60 feet each; 2 roof/first floor/traveling crane support columns at 60 feet each).
- Travelling Crane (2 girders each 25 feet long).
- Penstock Pipes (3 pipes each 8-foot diameter, each 60 feet long).
- Penstock Gates (3 each).
- Turbines (three 30-inch McCormick turbines, 400 revolutions per minute [rpm]).
- Governors (three total).
- Generators (three 750 kilowatt [kW], 6,600 volt).
- Pot Transformer (at least one based on September 2020 drone survey inside the lower level of the former Powerhouse, possibly two based on undated historical photographs following the end of hydroelectric operations, which show the same transformer observed in the drone survey and one other transformer).
- Switchgear (various).

The lid on one of the two transformers shown in the historical photographs is open and no oil is visible inside. The transformer with the open lid was observed in the drone video footage taken inside the lower level of the Powerhouse in September 2020 (but the lid was observed to be closed during the survey). The other transformer shown in the historical photographs was not observed in the September 2020 drone survey.

5.2.6 Non-TSCA Wastewater

Wastewater will be generated from the decontamination of equipment, wetting of debris piles, and rainwater falling on material staging areas and the equipment decontamination pad. As deconstruction of the Powerhouse progresses, Sessler shall keep building materials adequately wet and does not anticipate any significant accumulations of wastewater generated through dust suppression.

Sessler will perform additional sampling and analysis on the assumed non-hazardous, non-regulated wastewater in order to meet the end disposal facility requirements as noted in Section 6.3. Additionally, Refer to Sessler's SSHASP for additional details.

It is anticipated that up to approximately 21,000-gallons of non-TSCA regulated wastewater will be generated throughout the duration of the project.

5.2.7 TSCA/RCRA Regulated Wastewater

Should the results of Sessler's sampling and analysis of the assumed non-TSCA regulated wastewater

prove to be hazardous as regulated by TSCA or RCRA, Sessler will load such materials out to an EPA-approved facility.

Sessler does not anticipate any wastewater to be TSCA/RCRA regulated; however, the assumed non-TSCA wastewater 21,000-gallon storage tank will be sampled and analyzed to determine the waste stream.

5.2.8 Miscellaneous Waste Streams

Sessler shall also manage any encountered miscellaneous waste streams, such as used oils, motors/generators, and any potential universal wastes. With the use of appropriate PPE, Sessler, shall identify, assess, and remove any remaining universal waste, of which shall be placed in containers supplied by Sessler for regulated off-site transportation, disposal and/or recycling. Universal waste shall be defined and managed per 40 CFR Part 273, which, per EPA, are materials that are classified as hazardous wastes but are exempt from hazardous waste regulations provided, they are collected for recycling.

Removals will be performed in accordance with manufacturer's standard installation/removal procedures, or in a manner as to not damage the component(s). Any adjacent components that are observed to be impacted by leaks or release of universal waste must also be collected and appropriately packaged and/or cleaned.

Universal waste materials that Sessler may be required to remove include the following:

- Light Fixtures:
  - Fluorescent lighting.
  - Mercury bulbs.
  - Incandescent lighting.
  - High intensity discharge (HID) bulbs and high-pressure light bulbs.
- PCB containing light fixtures & ballasts.
- Switch components.
- Mercury containing equipment.
- Used or new thermostats.
- Batteries - Non-hazardous batteries that are not leaking and have been discharged of energy.

Department of Transportation (DOT) approved containers that are anticipated to be utilized are:

- Disposal bags, 6-mil thickness, leak-tight polyethylene bags.
- DOT hazardous waste disposal drums: 55-gallon open top steel drums.
- Cubic yard boxes with 6-mile polyethylene liner (as needed).
- Boxes for bulbs, various sizes (e.g., 4-ft, 8-ft, etc.).
- Wood pallets for batteries with plastic banding (do not shrink wrap).

All universal waste and miscellaneous hazardous materials waste removal work shall be in performed accordance with the following:

- Sessler shall initially label all containers with permanent marker with the words "Universal Waste", followed by as applicable, "batteries,", "lamps," "thermostats," "ballast," etc., prior to adding any universal waste to containers; as well as the date the universal waste was generated or the date that universal waste was FIRST placed in the container.
- Battery contacts will be sealed as to not come in contact with other connectors or metals.
- All containers on-site will remain closed at all times unless waste is being added or removed.
- All universal waste on-site will be shipped off-site to EPA approved facilities.
- Sessler will place appropriate sticker labels on each container and will label all containers during on-site storage. This includes labels on the matrix.

- Sessler will label containers with appropriate DOT labels prior to off-site transport.

5.3 On-Site Transportation

Sessler shall utilize a 25-ton capacity articulating end dump in order to transport all former powerhouse deconstructed materials, spill cleanup material, and PPE to the upland MSA(s) for further sampling and analysis and/or loadout processes.

Following on-site transportation of visually impacted, potentially TSCA material, the haul truck will be cleaned so that it is visibly clear of any debris and rinsed as needed prior to hauling non-TSCA material.

5.4 Waste Staging

All building deconstruction debris materials (except for non-friable ACM) shall be temporarily staged within the dedicated non-TSCA and potential TSCA MSAs within the upland work area.

Below grade materials in contact with bedrock/soil will be placed in the potential TSCA-impacted staging area and sampled to determine disposal. If PCB concentrations are greater than or equal to 25 ppm, the material will be disposed of as TSCA-regulated. The non-friable ACM will be placed into lined roll off containers in accordance with New York State Department of Labor (NYSDOL) Code Rule 56 Regulations.

Deconstructed materials shall be temporarily stored on-site pending final waste characterization and final determination of waste streams. The MSAs shall consist of the specified sand and aggregates, geotextiles, 40-mil textured high-density polyethylene (HDPE) liner, and a liquid collection sump, per Detail 3 in RAD Drawing G-502.

Potentially impacted construction wastewater will be collected and stored in an open top 21,000-gallon frac tank with secondary liner system until further sampling and analysis can determine the final waste stream. Sessler shall manage and track the approximate volume of water contained within the tank, and at approximately 1,500 gallons of accumulated construction water, Sessler will coordinate sampling and analysis (refer to Section 6.3 for additional information). Additionally, a secondary, smaller water storage tank (such as a 5,000-gallon poly tank) will be utilized to support the ongoing processing of construction water as needed in the event of nearing the capacity of the 21,000-gallon frac tank with anticipated future daily generation projections. This secondary tank would be utilized until the analytical data is received from the primary 21,000-gallon frac tank and the waste determination with subsequent offsite regulated transportation and disposal is completed. This will allow Sessler to not potentially cross contaminate the construction water within the primary 21,000-gallon frac tank.

Sessler has assumed the construction water and liquids to be non-TSCA until further analysis proves otherwise. Options for on-site water treatment may be implemented pending final determination of concentrations.

All work areas and material stockpiles shall be cleaned of loose/flying debris each day to the approval of the Client and EPA. To the extent practical, heavier debris shall be placed on less dense debris to eliminate the potential for flying debris and associated safety hazards.

All MSAs, as well as assumed and/or known impacted debris piles, shall be covered with 6-mil fire retardant plastic sheeting and weighted down with sandbags until waste characterization has been completed and material is loaded out. The plastic sheeting will be marked by spray paint to visually clarify the status of the debris pile:

- Blue: Samples have been taken and characterization is pending.
- Green: Pile has been sampled and waste has been characterized as non-TSCA regulated waste; material is ready for loadout.

- Red: Material has been sampled and has been characterized as TSCA regulated waste; material is ready for loadout.

5.5 Waste Minimization and Volume Reduction

During project planning, every effort will be made to minimize the amount of waste generated by the following means:

- Aggressively sort and segregate materials based on known or anticipated waste streams at the point of deconstruction.
- Perform segregation and consolidation processes outside of known or potential PCB contaminated areas of which may be TSCA regulated.
    - Materials shall be segregated at the point of deconstruction based on odors, photoionization detector (PID) readings (if odors are noted), and/or visible staining – materials will then be transported via haul truck to the respective MSAs.
- Decontaminate items to the greatest extent practical.

5.6 Waste Tracking

Waste movement from initial on-site generation to regulated offsite transportation and disposal will be tracked using an Excel spreadsheet. Uniform Hazardous or Non-Hazardous Waste Manifests for each load of regulated or non-regulated material leaving the site will be processed by Sessler and signed off by Arcadis on behalf of National Grid (Generator for Non-TSCA Materials) and GE (Generator for TSCA Regulated Materials). Bill of Ladings (BOLs) will be utilized for all steel and equipment recycling, which shall be coordinated and managed by National Grid.

Each manifest shall be documented in an on-site load tracking report, which will be correlated daily with Arcadis's tracking report. Final trucking and disposal tickets from the transportation vendor and disposal facility will be submitted to the Client as soon as it is received by Sessler – this may be one to two days after the load leaves the Site. Copies of the waste tracking summary and certificates of disposal will be provided to the EPA and respondents on a weekly basis.

Additionally, the tracking log will be maintained to document the following:

- Waste stream classification.
- Anticipated weight or volume.
- Waste Hauling Firm.
- Truck driver name and phone number.
- Truck Number and license plate number.
- Container type (i.e., dump trailer, dump truck, roll off, etc.).
- Trailer or Container Number, and license plate number.
- Time on-site.
- Time off-site.

6.0 Waste Stream Sampling and Characterization

All wastes streams will be managed on site by Sessler including the waste sampling, coordination with independent certified laboratory for analysis, and characterization to meet disposal facility WAC. Sessler shall discuss all waste sampling for each waste stream with Arcadis and EPA on-site representatives prior to sampling, and EPA shall be notified of planned waste sampling activities and be given the opportunity to be present for all sampling events.

The collection of samples for waste characterization will be consistent with requirements of the EMPM Work plan and proposed landfill WAC, as identified in the sampling matrix (see Drawing 22-3100-24), as well as in compliance with any direction of EPA site representatives and the Arcadis field team. All

sample retrieval will be documented, including the location of all sampling points. Waste characterization samples for disposal purposes will not require QA/QC sampling; however, if sampling is used to delineate material to be left on site, it will be completed in compliance with the GE QAPP.

Waste characterization sampling will be performed by qualified environmental staff (Sessler and/or Arcadis). Arcadis will oversee all sample collection. Collection of samples will be coordinated/scheduled with EPA and overseen by the on-site EPA representative unless otherwise agreed to by EPA. Sampling will be performed as required by EPA. Collected samples will be picked up either Monday, Wednesday, or Friday by Adirondack Environmental Services for delivery to their lab for analysis. All samples will be tracked with a Chain of Custody (COC) form provided by the laboratory documenting, at a minimum, sample identification numbers, dates, times, locations, and waste streams. The samples will be packaged and stored according to specifications provided by the analyzing laboratory.

All PCB and Toxicity Characteristic Leaching Procedure (TCLP) results will be submitted to Arcadis and provided to National Grid, GE and EPA to review. Unless analyses show elevated results above project and/or regulatory limits, review of individual VOCs and others will not be performed by GE prior to offsite transportation and disposal.

6.1 EMPM Sampling Requirements

Per the EMPM Work Plan, sampling and analysis for PCBs will be performed at an approximate minimum frequency of one sample per approximate 100-cy of material from debris. If sampling in-situ, the sampling frequency will be determined by total estimated in-place volume (Refer to 6.1 and see Drawings 22-3100-23 and 22-3100-24 for additional information). If in-situ sampling is not feasible, material will be stockpiled in approximate 100-cy piles within the upland MSAs for further sampling and analysis. In-situ sampling is not anticipated for building materials suspected to be impacted by HF Contaminants unless in-situ sampling would be beneficial based on field conditions during deconstruction or as otherwise agreed to by EPA and the Respondents. Such materials will be stockpiled in approximate 100-cy piles within the potential TSCA MSA for further sampling and analysis.

6.1.1 In-Situ Sampling

This subsection applies to building materials that are not anticipated to have been impacted by HF Contaminants as outlined in the RAD. In-situ sampling is not anticipated for building materials suspected to be impacted by HF Contaminants unless in-situ sampling would be beneficial based on field conditions during deconstruction or as otherwise agreed to by EPA and the Respondents. As deconstruction progresses and the stability of the building improves overall for safe access, Sessler shall implement in-situ sampling of building materials and equipment in order to expedite the removal and upland staging process (i.e., waste streams will be confirmed prior to removal and staging). In-situ sampling will be performed to the extent feasible, pending safe access, Arcadis and EPA approval.

Refer to Attachment 1, Drawing 22-3100-24 for a Waste Sampling Matrix. The Waste Sampling Matrix provides the anticipated quantity of samples based on the estimated volume of waste generated and does not account for additional sampling that would be needed if building materials are suspected to be contaminated (former electric component areas, PID hits, staining, etc.). As shown in the Waste Sampling Matrix, PCB composite samples will be collected to characterize PCBs and RCRA composite samples (TCLP analysis) will be collected to determine if the materials are RCRA Hazardous Waste. The PCB composite sampling will consist of surface samples (target of 1 cm, which is consistent with USEPA's – How to Test for PCBs and Characterize Suspect Materials guidance, last updated January 12, 2022), while the RCRA composite sampling will consist of deeper penetration cores. The results of the sampling will serve to characterize waste material generated during the removal action and support a decision regarding off-site transportation and disposal. The sampling of stained areas will serve to characterize only the stained area and not the rest of the building component and the results will be used to support a decision regarding the off-site disposition of the stained area. The sampling approach for the lower-level floor slab will incorporate sampling on the underside of the slab, which may have been in

contact with HF Contaminants (as required by EPA). It is anticipated that in-situ sampling will be performed for the lower-level interior walls to confirm that non-HF Contaminants are not present before the material is placed on the upland MSA where it may be difficult to distinguish between materials potentially impacted by HF vs. non-HF contaminants.

In-situ sampling may consist of the following:

- PCB Wipe sampling of structural steel and equipment.
- PCB grab or composite samples of concrete, brick and other accumulated debris
  - 1-inch diameter cores at 1 cm target depth.
- TCLP composite:
  - 5-6 grab samples of accumulated brick.
  - 1-inch diameter concrete cores from slabs.
- Miscellaneous accumulated debris: As needed, Sessler shall collect a composite grab sample of debris that has accumulated on either the elevated slab or the ground floor slab.
- Other sampling as required by EPA.

6.1.2 Debris Pile Sampling

This section applies to materials where in-situ material sampling is not feasible or those materials that may be impacted by HF Contaminants as outlined in the RAD. If in-situ sampling (on materials not suspected to be impacted by HF Contaminants) is not feasible and materials must be stockpiled in the upland MSAs prior to analysis, samples submitted for PCB laboratory analysis will be from locations that are biased toward visual observations of staining or other impacts, or otherwise representative of the 100-cy quantity as required by the EMPM Work Plan or as directed by EPA. TCLP and other hazardous property samples will occur at the frequency determined by the landfill as shown in Section 6.2.2 and 6.2.3.

Debris suspected to be impacted by HF Contaminants (as depicted in the RAD) will be sampled in the TSCA MSA in accordance with the EMPM. For completeness the anticipated number of samples anticipated to collected from these materials is included in the attached Waste Sampling Matrix.

The laboratory turnaround time will be determined in consideration of the overall project schedule and sequence. After samples are collected and submitted for analysis, the stockpiled materials will continue to be secured within the staging area to minimize migration due to wind or rainfall events. The materials will not be disturbed (i.e., materials will not be added to or removed from the characterized stockpile) until results are received and the appropriate disposition is determined.

6.2 Sampling Requirements

The following WAC are established for accepting non-TSCA regulated soil or construction/demolition debris.

6.2.1 Non-Friable ACM C&D to Seneca Meadows Landfill

The anticipated non-friable ACM C&D resulting from non-friable ACM removal of the existing parapet flashing is currently accepted by Seneca Meadows based on review of the existing asbestos survey. No further sampling is required.

6.2.2 Non-TSCA Regulated Soil to Seneca Meadows Landfill

For soil generated, sampling will be conducted for the following:

- TCLP VOC
- TCLP SVOC
- TCLP Metals

- TCLP Pesticides
- TCLP Herbicides
- Total PCBs
- Percent solids
- Reactivity
- pH
- Flashpoint
- Cyanides

Number of samples required – One time only approvals:

1 – 200 tons	One (1) sample required
201 – 500 tons	Two (2) samples required
501 – 1,000 tons	Three (3) samples required
1,001 – 2,000 tons	Four (4) samples required
Over 2,000 tons*	Determined by Seneca Meadows

**If quantity of waste is over 2,000 tons, a sampling plan will need to be submitted, where the frequency of additional sampling will be determined by Seneca Meadows. Assume 1 sample is required for every additional 1,000 tons of material.*

If PCB sample results are available, analysis of removed soil for PCBs may not be performed subject to approval by the disposal facility.

Because the EMPM Work Plan required sampling frequency exceeds Seneca Meadows' sampling requirements for PCBs, Sessler shall submit for approval a sampling plan prior to shipping any waste.

6.2.3 Non-TSCA Regulated Deconstruction Debris to Seneca Meadows Landfill

As described in Section 6.1, all construction debris will be sampled in accordance with the EMPM Work Plan, approved disposal facility requirements, and as required by EPA. Previously acquired TCLP data for the above-grade brick material will be supplied to the disposal facility. In addition to PCB characterization, representative samples of newly encountered waste streams (i.e., concrete) will be collected for TCLP analysis to determine if the materials are RCRA Hazardous Waste by characteristic, as required by the disposal facility.

Typical number of samples required by Seneca Meadows – One time only approvals:

1 – 200 tons	One (1) sample required
201 – 500 tons	Two (2) samples required
501 – 1,000 tons	Three (3) samples required
1,001 – 2,000 tons	Four (4) samples required
Over 2,000 tons*	Determined by Seneca Meadows

**If quantity of waste is over 2,000 tons, a sampling plan will need to be submitted to the Landfill, where the frequency of additional sampling will be determined by Seneca Meadows.*

6.2.4 TSCA Regulated Deconstruction Debris & Soil

TSCA regulated materials based on sampling conducted in accordance with EMPM Work Plan requirements (sampling for PCBs at every approximately 100-cy of estimated in place materials, or of material generated and stockpiled in upland MSAs) will be managed and disposed of at US Ecology's WAYNE DISPOSAL facility.

6.2.5 Steel and Equipment

Steel and equipment will be visually reviewed for staining as safe access is obtained. If visual inspection does not reveal any visible contamination, all equipment (i.e., penstock piping, turbines, etc.) and metal beams will be live-loaded into a roll-off container staged at the dedicated live-loading area. PCB wipe

sampling shall be performed as needed based on visual inspection, ideally in-situ. If in-situ wipe sampling is not feasible due to safety concerns, any potentially contaminated equipment or metal beams will be removed, transported, and staged within the potential TSCA MSA or other proposed lined area approved by EPA for wipe sampling. Equipment will be drained of internal equipment fluids such as oils, if present. The drained fluids will be containerized and sampled for PCBs and other known or suspect constituents. The results of the fluid sampling will also be used to aid in the decision making for final disposal and/or recycling of equipment.

6.3 Glens Falls WWTP Sampling Requirements

Sessler shall coordinate the sampling and analysis of the collected wastewater based on the disposal facility requirements of one sample per 21,000-gallon frac tank, or per frac tank sampling event if at a lower volume. The facility is anticipated to accept loads of construction water up to the volume within the primary frac tank at time of on-site sampling, of which is anticipated to be around 15,000-18,000 gallons within the primary 21,000-gallon capacity frac tank. As mentioned above, a secondary smaller construction water storage tank will be utilized as needed in order to maintain on-site construction water processing.

Maximum concentrations of discharge allowed into the Glens Falls wastewater treatment plan (WWTP) are as follows:

Constituent	**Limit milligrams per liter [mg/l]**
Antimony	10
Ammonia	40
Arsenic	0.25
Benzene	0.1
Boron	5.0
Cadmium	0.25
Calcium	500
Chloroform	1.0
Chromium, total	1.0
Copper	1.0
Cyanide, total	3.0
Ethylbenzene	0.1
Iron	5.0
Lead	2.66
Manganese	5.0
Mercury	0.001
Methylene Chloride	1.0
Naphthalene	1.0
Nickle	2.34
Oil and Grease	50
pH (range in Std Units)	6.0-9.0
Phenols	5.0
Silver	0.2
Toluene	0.1
1,1,1-Trichloroethane	1.0
Xylene	0.1
Zinc	1.5

6.4 ACV Enviro, LLC Sampling Requirements

ACV Enviro, LLC's acceptable limits for Lead Paint Chip disposal are as follows:

- pH 4-11
- No free liquids
- No organic underlying hazardous constituents (UHCs) or cyanides exceeding the Universal Treatment Standards (UTS) levels
- Heat of dilution <10 °C
- FP >140 °F
- Incidental debris only
- D004-D011 only
- Mercury must be <10 ppm (total); no free mercury
- Pb <1,000 ppm (TCLP) As, Se <7.0 ppm
- Waste must be compatible with stabilization reagents.

Lead paint chip debris will be treated as needed to meet land disposal restrictions and properly disposed of by Cycle Chem.

6.5 Personal Protective Equipment

Waste PPE generated by deconstruction activities (i.e., disposable protective coveralls, etc.) will be placed in plastic bags, marked and labeled, and then disposed of concurrently with the building debris and other wastes destined for an approved disposal facility as outlined above.

6.6 Sampling Waste

All investigation derived waste (IDW) generated from sampling activities will be considered contaminated and shall be treated accordingly until proven otherwise from analysis.

7.0 Off-Site Transportation

General requirements pertaining to packaging, transport, and disposal are outlined below. All deconstructed materials will be transported off-site for regulated disposal to an EPA-approved disposal facility. Sessler will ensure that all waste destined for off-site disposal will comply with the "off-site rule," which governs the disposal of waste within the CERCLA guidelines.

All loads being hauled off the site are to be loaded in the designated areas adjacent to the MSAs. Loadout areas will have poly laid at grade prior to loading out any material.

All truck loads leaving site will be visually inspected and free from loose material so as not to track dirt and/or debris onto site access roads or public roads. Sessler anticipates all waste hauling trucks to be equipped with automatic tarping systems. Trucks shall be tarped within the loading area immediately following loading and loose debris removal.

Trucks will pass through the equipment decontamination pad if necessary.

7.1 Non-TSCA Regulated Waste

For the purposes of this plan, non-TSCA regulated wastes are those that are not considered hazardous under federal or state regulation. This would include such items as paper, cardboard, wood debris, deconstruction material, construction material, and used PPE. These materials will be collected in roll-offs or live loaded into a trailer for disposal at and approved landfill as non-contaminated waste, pending characterization results.

In addition to the loading procedures outlined above in Section 7.0, if the temperature is at or below freezing, trucks will have a single layer of 6-mil poly placed on the floor of the trailer to prevent debris from freezing to the bottom of the trailer bed, which would delay unloading at the landfill.

7.2 TSCA Regulated Waste

Hazardous TSCA regulated waste is intended to be loaded from the designated MSAs within the regulated area of the Site. Hazardous waste to be shipped from the Site will be identified, packaged, and transported in accordance with all applicable rules and regulations.

In addition to the loading procedures outlined above in Section 7.0, trucks will be lined with a single layer of 6-mil poly prior to loading.

7.3 Non-TSCA Regulated Wastewater

Non-TSCA-regulated wastewater (i.e., construction water) will be pumped into tanker trucks for regulated off-site transportation and disposal. The tanker truck will either cam-lock connect to the port at the rear of the frac tank or extract the water from the open top.

7.4 Documentation

As mentioned in Section 5.6, Hazardous and/or Non-Hazardous Waste Manifests/Bills of Lading for each load of regulated material leaving the Site will be processed by Sessler and signed off by the Arcadis on behalf of the Generator (i.e., National Grid and/or GE, depending on waste stream). Once signed by the Generator, the truck driver will sign as the Transporter and submit the manifest to the landfill upon arrival to the facility. Copies of fully executed manifests shall be returned to Sessler for subsequent submission to Arcadis.

Each manifest shall be documented in an on-site load tracking report, which will be correlated daily with the Client's tracking report. Final tickets from the disposal facility will be submitted to the Client as soon as it is received by Sessler – depending on the disposal facility, this may be one to two days after the load leaves the Site. Copies of all manifests and certificates of destruction will be provided to the EPA and Respondents in the Final Report.

8.0 Waste Disposal Facilities

The following approved solid waste management facilities shall be utilized, pending EPA approval:

Non-Friable ACM C&D Debris

- Seneca Meadows Landfill
  1786 Salcman Rd.
  Waterloo, NY 13165
  Phone: 315-539-5624

Non-TSCA Regulated Soil

- Seneca Meadows Landfill
  1786 Salcman Rd.
  Waterloo, NY 13165
  Phone: 315-539-5624

Non-TSCA Regulated Deconstruction Debris

- Seneca Meadows Landfill
  1786 Salcman Rd.
  Waterloo, NY 13165
  Phone: 315-539-5624

TSCA Regulated Deconstruction Debris & Soil

- US Ecology's WAYNE DISPOSAL (MID 048 090 633)

49350 N Interstate 94 Service Dr.
Belleville, MI 48111
Phone: 734-697-2200

Non-TSCA Regulated Wastewater:

- City of Glens Falls WWTP
  2 Shermantown Road
  Glens Falls, NY 12801
  518-761-3815

Lead Paint Chips (Decharacterization & Disposal)

- ACV Enviro/Cycle Chem
  550 Industrial Ave.
  Lewisberry, PA 17339
  Phone: 717-938-4700

Equipment and Ferrous/Non-Ferrous Salvage

- To be determined

Universal Wastes

- To be determined

Please refer to **Attachment 2** for Disposal Facility Documentation, which shall include the following:

- Documentation of the current permit status
- The most recent State or EPA regulatory inspection results

9.0 Waste Transporters

Sessler shall utilize the following transporters to haul generated wastes from the Site:

Non-Friable ACM C&D Debris:

- Goulet Trucking, Inc. (roll-off containers)
  20 Industrial Drive West
  South Deerfield, MA 01373
  413-665-1327

Non-TSCA Regulated Soil:

- Goulet Trucking, Inc.
  20 Industrial Drive West
  South Deerfield, MA 01373
  413-665-1327

Non-TSCA Regulated Deconstruction Debris:

- Goulet Trucking, Inc.
  20 Industrial Drive West
  South Deerfield, MA 01373
  413-665-1327

Non-TSCA Regulated Wastewater:

- Stone Industries, LLC
  4305 NY-50
  Saratoga Springs, NY 12866

518-584-1048

TSCA Regulated Deconstruction Debris & Soil:

- US Ecology's WAYNE DISPOSAL (MID 048 090 633)
  49350 N Interstate 94 Service Dr.
  Belleville, MI 48111
  Phone: 734-697-2200

Non-TSCA Regulated Wastewater:

- To be Determined

Lead Paint Chips:

- ACV Enviro/Cycle Chem
  550 Industrial Ave.
  Lewisberry, PA 17339
  Phone: 717-938-4700

Equipment and Ferrous/Non-Ferrous Salvage

- To be Determined

Universal Wastes

- To be determined

Please note, material transporters may change pending availability at time of project.

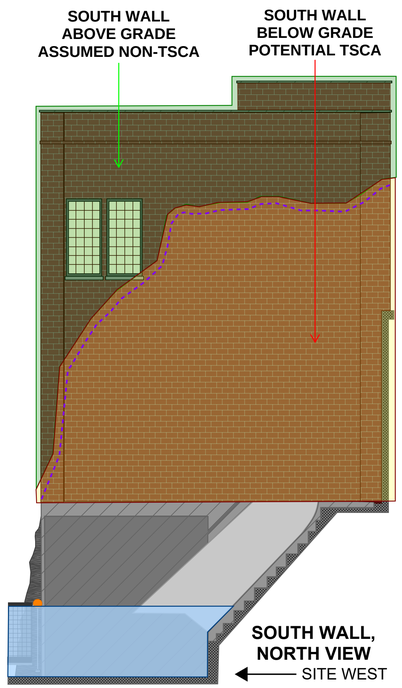
Please refer to **Attachment 3** for Transporter Documentation, which shall include the following:

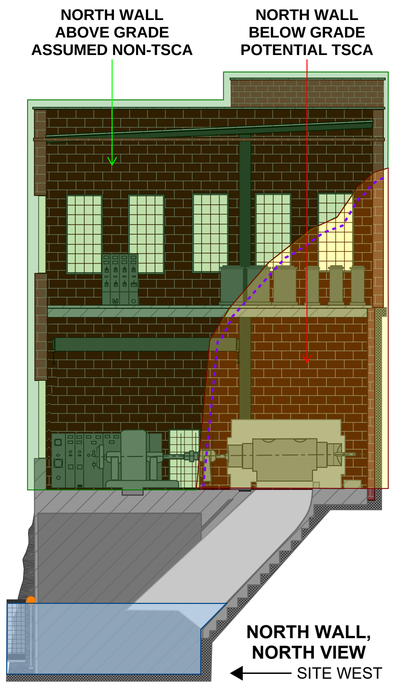
- Valid transporter permit

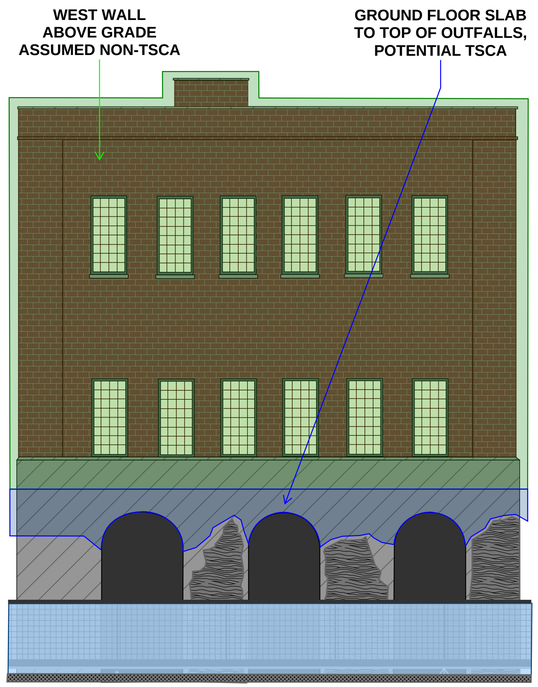
Attachment 1

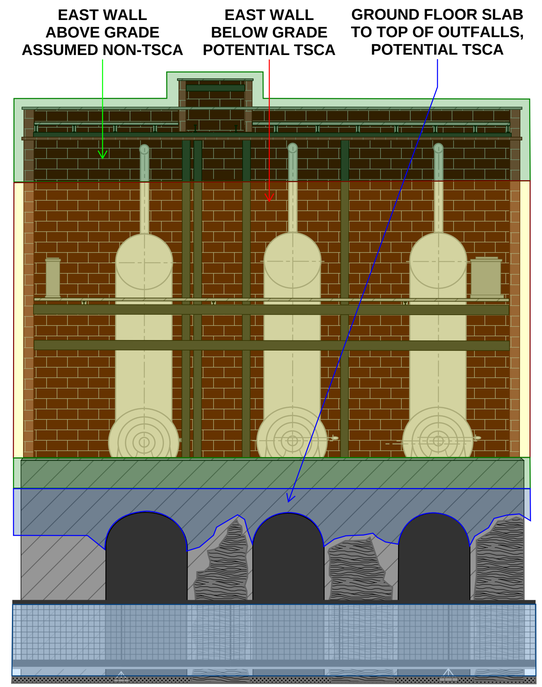
Drawings 22-3100-23 and 22-3100-24

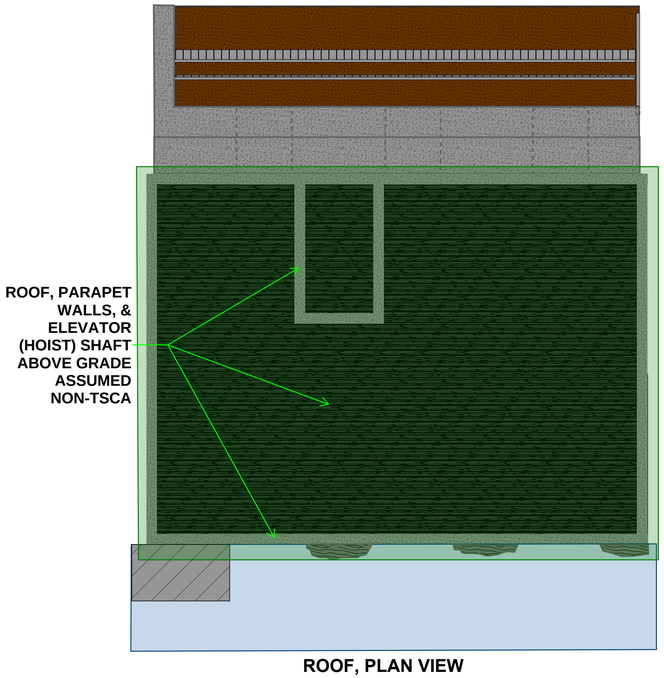
REFER TO SEPERATELY SUBMITTED SESSLER DOCUMENTS FOR ADDITIONAL DETAILS: SSHASP, SCP, POP, TRAFFIC CONTROL PLAN AND NYSPE STAMPED DESIGNS.

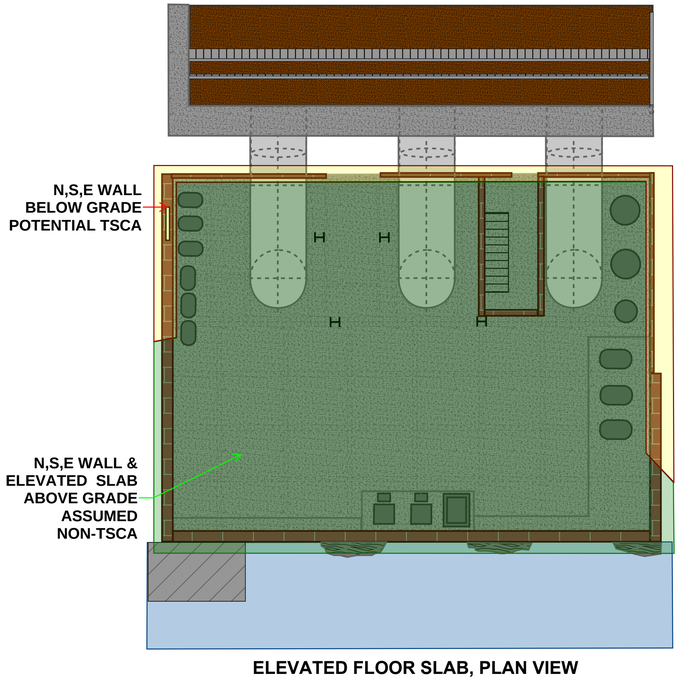


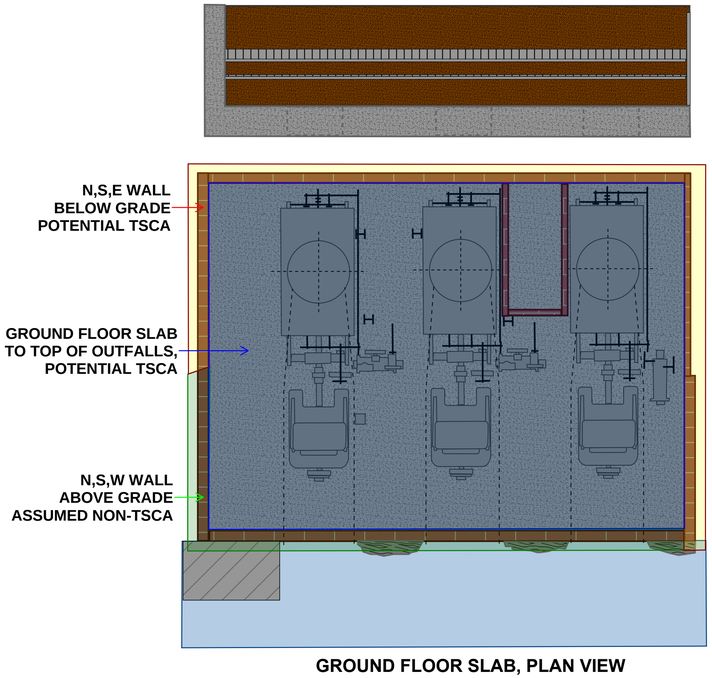












NOTES

- ABOVE GRADE, ASSUMED NON-TSCA (+/- 1-FT ABOVE EXISTING GRADE CONTOUR)
- BELOW GRADE, POTENTIAL TSCA (+/- 1-FT ABOVE EXISTING GRADE CONTOUR AND BELOW; MATERIALS IN CONTACT WITH BEDROCK/SOIL)
- CONCRETE SLAB IMMEDIATELY ABOVE PENSTOCKS TO BE REMOVED, POTENTIAL TSCA
- EXISTING GRADE CONTOUR

EQUIPMENT SUBMITTED FOR USE

LAST REVISED: 11/08/22

SESSLER WRECKING
1257 STATE RT 96N WATERLOO, NY 13165
PHONE: 1-800-833-3210
DEMO@SESSLERWRECKING.COM
WWW.SESSLERWRECKING.COM

PROJECT:
HUDSON FALLS POWERHOUSE DECONSTRUCTION

HUDSON FALLS, NY 12839

CONTRACTOR:

CLIENT:
NATIONAL GRID

DRAWING TITLE:
MATERIAL SEGREGATION PLAN FOR WASTE CHARACTERIZATION

SEAL & SIGNATURE

DATE:	OCTOBER 26, 2022
PROJECT NO:	22-3100
DRAWN BY:	AH
CHECKED BY:	CG
SCALE:	NOT TO SCALE
DRAWING NUMBER:	22-3100-23

REFER TO SEPERATELY SUBMITTED SESSLER DOCUMENTS FOR ADDITIONAL DETAILS: SSHASP, SCP, POP, T&D PLAN AND NYSPE STAMPED DESIGNS.

Waste Sampling Plan for Former Powerhouse Materials

Sessler Wrecking: National Grid Hudson Falls Former Powerhouse Deconstruction

Date: 11/22/22

Description	Building Component	Location of Building Component	Anticipated Waste Stream Designation	Characterization Approach	PCB Wipe Test, Each	PCB Composite Sample, Each	RCRA Composite Sample, Each	Estimated Volume, CY	Estimated Weight, Ton
Upper Level	Concrete Roof Deck	Above Grade	Non-TSCA	RCRA Characterization sampling of concrete from roof not required by disposal facility. PCB concrete core composite samples to be taken.	0	2	0	50	100
	Structural Steel (Encased & Upper Level Structural)	Above Grade	Non-TSCA	Visual review. If staining observed collect wipe samples for PCBs.	1	0	0	0	16
	Steel Penstock Piping	Above Grade	Non-TSCA	Visual review. If staining observed collect wipe samples for PCBs.	1	0	0	0	17
	Brick (N,S,E Walls +/- 1-ft from existing grade contour, includes elevator shaft above roof; includes entire upper level West wall)	Above Grade	Non-TSCA	Engineer previously collected 2 full-depth core samples from two separate locations during pre-design activities. 1 additional PCB composite sample needed. Additional RCRA sampling not required by disposal facility.	0	2 previously collected; 1 additional needed	2 previously collected	290	490
	Brick (N,S,E Walls +/- 1-ft from above existing grade contour and below)	Below Grade	TSCA	RCRA characterization as required by disposal facility. PCB samples collected from a minimum of 2 locations.	0	2	1	120	210
Elevated, Upper Level Floor Slab	Concrete Floor and Equipment Pads	Above Grade	Non-TSCA	RCRA characterization as required by disposal facility. PCB samples collected from a minimum of 2 locations.	0	2	1	90	130
	Structural Steel (Encased)	Above Grade	Non-TSCA	Visual review. If staining observed collect wipe samples for PCBs.	1	0	0	0	7
Lower Level	Structural Steel	Above Grade	Non-TSCA	Visual review. If staining observed collect wipe samples for PCBs.	1	0	0	0	23
	Equipment	Above Grade	Non-TSCA	Visual review. If staining observed collect wipe samples for PCBs.	10	0	0	0	200
	Penstock Piping	Above Grade	Non-TSCA	Visual review. If staining observed collect wipe samples for PCBs.	1	0	0	0	17
	Brick (N,S,E Walls +/- 1-ft from existing grade contour; entire W wall) above the top of the western concrete knee wall)	Above Grade	Non-TSCA	Material to be considered part of same waste stream as Upper Level, Above Grade Brick. No further RCRA sampling planned.	0	2	0	170	290
	Brick (N,S,E Walls +/- 1-ft from above existing grade contour and below) - Potential HF Contaminated material	Below Grade	TSCA	RCRA characterization as required by disposal facility and as outlined in the EMPM.	0	2	0	220	360
	Ground Level Concrete Slab and Foundation (potentially impacted by HF Contaminants)	Below Grade	TSCA	RCRA characterization as required by disposal facility. PCB samples collected from a minimum of 8 locations.	0	8	4	780	1100
				Totals	**15**	**19**	**6**	**1720**	**2960**
				Totals, Anticipated Non-TSCA C&D	0	15	1	1380	1010
				Totals, Anticipated TSCA C&D	0	4	5	340	1670
				Totals, Anticipated Steel & Equipment	15	0	0	0	280

Notes:

1. Refer to Sessler Drawing No. 22-3100-23 Material Segregation Plan for Waste Characterization for additional information.
2. All sampling will be performed in coordination with Arcadis and USEPA. Samples will be biased toward areas of visual impacts, and quantity of samples is subject to change pending extent of visual impacts observed in the field.
3. Above grade designates existing building materials that are not in contact with existing grade (i.e. soil and/or bedrock). Below grade shall mean existing building materials that are within +/- 1-ft of existing grade, of which are or may be in contact with existing site soils/bedrock.
4. RCRA characterization sampling will not include corrosivity for the above solid debris waste streams because the material is not aqueous.
5. PCB building samples will include samples biased toward visibly stained material (if present) to characterize those areas.
6. Additional samples may be needed, as required by EPA, for proper characterization, segregation and disposal. The sampling of materials suspected to be contaminated (e.g., staining, PID hits, odors) will be in addition to the anticipated sampling outlined in the matrix above.
7. The PCB composite samples will consist of surficial cores (target of 1 cm). The RCRA composite samples will consist of deeper penetration cores.

NOTES

EQUIPMENT SUBMITTED FOR USE

LAST REVISED: 11/29/22

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PHONE: 1-800-833-3210
DEMO@SESSLERWRECKING.COM
WWW.SESSLERWRECKING.COM

PROJECT:
HUDSON FALLS POWERHOUSE DECONSTRUCTION
HUDSON FALLS, NY 12839

CONTRACTOR:

CLIENT:
NATIONAL GRID

DRAWING TITLE:
SAMPLING REQUIREMENTS MATRIX

SEAL & SIGNATURE

DATE:	OCTOBER 28, 2022
PROJECT NO:	22-3100
DRAWN BY:	AH
CHECKED BY:	CG
SCALE:	NOT TO SCALE
DRAWING NUMBER:	22-3100-24

Attachment 2

Disposal Facility Documentation

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

DEC PERMIT NUMBER	PERMIT	EFFECTIVE DATE
8-4532-00023/00001	Under the Environmental Conservation Law (ECL)	Renewed and Modified October 31, 2017
FACILITY/PROGRAM NUMBER(S) 50S08		EXPIRATION DATE(S) December 31, 2025

TYPE OF PERMIT ☐ NEW X Renewal X Modification X Permit to Construct X Permit to Operate

D Article 15, Title 5: Protection of Waters

☐ Article 15, Title 15: Water Supply

☐ Article 15, Title 15: Water Transport

☐ Article 15, Title 15: Long Island Wells

☐ Article 15, Title 27: Wild, Scenic and Recreational Rivers

☐ 6NYCRR 608: Water Quality Certification

☐ Article 17, Titles 7, 8: SPDES

☐ Article 19: Air Pollution Control

☐ Article 23, Title 27: Mined Land Reclamation

☐ Article 24: Freshwater Wetlands

D Article 25: Tidal Wetlands

X Article 27, Title 7; 6NYCRR 360: Solid Waste Management

D Article 27, Title 9; 6NYCRR 373: Hazardous Waste Management

☐ Article 34: Coastal Erosion Management

☐ Articles 1, 3, 17, 19, 27, 37; NYCRR 380: Radiation Control

☐ Other:

PERMIT ISSUED TO			TELEPHONE NUMBER
Seneca Meadows, Inc.			(315) 539-5624
ADDRESS OF PERMITTEE			
1786 Salcman Road, Waterloo, NY 13165			
CONTACT PERSON FOR PERMITTED WORK			TELEPHONE NUMBER
Kyle Black			(315) 539-5624
NAME AND ADDRESS OF PROJECT/FACILITY			
Seneca Meadows Landfill, 1786 Salcman Road, Waterloo, NY 13165			
LOCATION OF PROJECT/FACILITY			
1786 Salcman Road, Waterloo, NY 13165			
COUNTY	TOWN	WATERCOURSE	**NYTM** COORDINATES
Seneca	Seneca Falls	Water Body: *NIA*	E:349200 N:4754700

DESCRIPTION OF AUTHORIZED ACTIVITY:

Construction and Operation of a Municipal Solid Waste Landfill with an approved design capacity of 6000 tons per day and a Waste Tire Processing Facility.

By acceptance or this permit. the pennittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations. the General Conditions specified **(see page 2)** and any Special Conditions included as part of this permit.

PERMIT ADMINISTRATOR:	ADDRESS
Scott E. Sheeley	6274 E. Avon-Lima Rd, Avon, NY 14414

AUTH ED SIGNATURE 2 - Sheeley

DATE {}(,7"Dl.!,e/<._ 3 f, 2 .:J f7

NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

6 NYCRR Part 360-2

SOLID WASTE MANAGEMENT FACILITY INSPECTION REPORT

(For use at Mixed Solid Waste Landfills, Industrial /Commercial Waste Monofills, or Ash Residue Monofills)

FACILITY NAME:	LOCATION:	FACILITY ID#:	DATE:	TIME:
Seneca Meadows	Seneca (C), Seneca Falls (T)	50 S 08	7-28-22	AM-PM

INSPECTOR'S NAME:	CODE:	REGION:	PERSONS INTERVIEWED & TITLES:
Anthony Black	M	8	SMI Staff

WEATHER CONDITIONS:	DEC PERMIT NUMBER:
Weather: Partly Cloudy, 85ºF, wind 5-20 mph W, ground surfaces: dry	8-4532-00023-00001-0

SHEET	CONTINUATION SHEET	PART(S) 360-
1 OF 2	(X) YES ( ) NO	None Attached

Violations of Part 360 are Subject to Applicable Civil, Administrative, and Criminal Sanctions Set Forth in ECL Article 71 and as Appropriate, the Clean Water and Air Acts. Additional Violations May be noted on Sheet one of this inspection report. Provide site sketches, clarification, supplemental information, locations of photographs or samples and/or locations of violations (uncorrected violations must be described in detail and located on a sketch.)

☒ PART 360 PERMIT ☐ ORDER ON CONSENT ☐ REGISTERED ☐ EXEMPT ☐ COMPLAINT ☐ CLOSED

C	NI	V	FACILITY MANAGEMENT
☒	☐	☐	1. Solid waste management facility is authorized and management occurs within approved area. 360-1.7(a) (1), (b); 360-1.8(h) (5)
			2. Incoming waste is monitored by a control program for unauthorized waste and solid waste material accepted are approved for management at the facility 360-1.14(e) (1)
☒	☐	☐	a. Hazardous/Low Level Radioactive Wastes 360-1.5(b), 360-2.17(m)
☒	☐	☐	b. Control Program. 360-1.14(e) (1)
☒	☐	☐	c. Department Approved Facility for Specific Wastes. 360-1.14(r)
☐	☒	☐	d. Bulk Liquids 360-2.17 (k)
☐	☒	☐	e. Whole Tires 360-2.17(v)
☐	☒	☐	f. Lead Acid Batteries 360-2.17 (w)
			3. Operator maintains and operates facility components and equipment in accordance with the permit and their intended use.
☒	☐	☐	a. Maintenance of Facility Components/Site Grading. 360-1.14(f) (1); 360-2.17 (h), (u)
☒	☐	☐	b. Adequate Equipment. 360-1.14(f) (2)
			4. Operational Records are available where required:
☐	☒	☐	a. Unauthorized Solid Waste Records. 360-1.14(l) (1)
☐	☒	☐	b. Self Inspection Records. 360-1.14(l) (2)
☒	☐	☐	c. Permit Application Records. 360-1.14(l) (3)
☐	☒	☐	d. Monitoring Records. 360-1.14(l) (4)
☐	☒	☐	e. Facility Operator Records. 360-1.14(u) (1)
☐	☒	☐	f. Fill Progression Records. 360-2.9 (e)
☐	☒	☐	g. Primary Leachate Collection and Removal System Logs 360-2.9(j) (3)
☐	☒	☐	h. Asbestos Waste Site Plan 360-2.17 (p) (2)
☐	☒	☐	i. Random waste collection vehicle inspection records 360-2.17(q)
			OPERATION CONTROL
☒	☐	☐	5. Solid waste, including blowing litter, is sufficiently confined and controlled. 360-1.14(j)
☒	☐	☐	6. Dust is effectively controlled so that it does not constitute a nuisance or hazard to health, safety, or property. 360-1.14(k)
☒	☐	☐	7. On-Site vector populations are prevented or controlled, and vector breeding areas are prevented 360-1.14(l)
☐	☒	☐	8. Odors are effectively controlled so that they do not constitute a nuisance. 360-1.14(m)
			WATER
☒	☐	☐	9. Solid waste is prevented from entering surface waters and/or groundwater. 360-1.14(b) (1)
☒	☐	☐	10. Leachate is minimized through drainage control or other means and is prevented from entering surface waters.360-1.14(b) (2); 360-2.17(g)
			ACCESS
☒	☐	☐	11. Access to the facility is strictly and continuously controlled by fencing, gates signs, natural barriers, or other suitable means.360-1.14(d)
☒	☐	☐	12. On-site roads are passable. 360-1.14(n); 360-2.17(s)
			WASTE HANDLING
☐	☒	☐	13. Solid Waste is spread in layers 2 feet or less in thickness, proper compaction is achieved with 3 passes of appropriately sized equipment and the working face area is the smallest practicable. 360-2.17(b) (1)
☐	☒	☐	14. Lift height does not exceed 10 feet, slope is at least 4 percent and no more than 33 percent, and wastes are placed and graded in accordance with fill progression plan 360-2.17(b) (2)
			15. Solid waste preparation measures and/or precautions are provided:
☐	☒	☐	a. Stabilized/dewatered sledges 360-2.17(n)
☐	☒	☐	b. Asbestos Waste 360-2.17 (p) (3)
☐	☒	☐	c. Tanks 360-2.17(r)
			COVER
☒	☐	☐	16. Daily cover material is suitable in quality, of proper compacted thickness, and is applied and maintained where and when required to control vectors, fires, odors, blowing litter, and scavenging 360-2.17 (c)
☐	☒	☐	17. Intermediate cover is suitable in quality, of proper compacted thickness, and is applied and maintained where and when required 360-2.17 (d)
☒	☐	☐	18. Final cover system material is suitable in quality, of proper compacted thickness, and is applied and maintained.360-2.17 (e)
			MONITORING
☒	☐	☐	19. Monitoring wells are intact. 360-2.17 (a); 360-2.11(a) (8) (v); (c) (1)
☒	☐	☐	20. Decomposition gasses are monitored and controlled 360-2.17(f); 360-8.3 (c)
			OTHER
			On Continuation Sheet identify any other violations

Anthony Black
Signature Anthony Black

I Hereby acknowledge receipt of the Facility Copy of this report

Signature not requested
Individual in responsible charge

AFB 7/28/22
Signature/Date

NEW YORK DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

6 NYCRR Part 360-2
SOLID WASTE MANAGEMENT FACILITY INSPECTION REPORT

(For use at Mixed Solid Waste Landfills, Industrial /Commercial Waste Monofills, or Ash Residue Monofills)

FACILITY NAME:	LOCATION:		FACILITY ID#:	DATE:	TIME:
Seneca Meadows	Seneca (C), Seneca Falls (T)		50 S 08	7-28-22	AM-PM
INSPECTOR'S NAME:	CODE:	REGION:	PERSONS INTERVIEWED & TITLES:		
Anthony Black	M	8	SMI Staff		
WEATHER CONDITIONS: Weather: Partly Cloudy, 85ºF, wind 5-20 mph W, ground surfaces: dry				DEC PERMIT NUMBER: 8-4532-00023-00001-0	
SHEET 2 OF 2	CONTINUATION SHEET ( ) YES (X) NO		PART(S) 360- None Attached		

Violations of Part 360 are Subject to Applicable Civil, Administrative, and Criminal Sanctions Set Forth in ECL Article 71 and as Appropriate, the Clean Water and Air Acts. Additional Violations May be noted on Sheet one of this inspection report. Provide site sketches, clarification, supplemental information, locations of photographs or samples and/or locations of violations (uncorrected violations must be described in detail and located on a sketch.)

☒ PART 360 PERMIT ☐ ORDER ON CONSENT ☐ REGISTERED ☐ EXEMPT ☐ COMPLAINT ☐ CLOSED

Item #6: One water truck was in operation during inspection.

Item #7: Site employed aerial vector control during waste placement using live birds and/or pyrotechnics.

Item #8: Conducted a perimeter road odor run at ~2:30 pm. Light MSW odor was encountered on Route 414 to the east of the ambulance building for ~200 feet. Light agricultural odor was encountered on Strong Road for ~500 feet. Light to light/medium MSW odor was encountered on Route 414 for ~1000 feet to the east of SMI. Odor control systems were in operation at time of inspection.

Item #12: Access and haul roads were in satisfactory condition at the time of inspection. Road grading was observed during the inspection.

Item #13: All waste observed on this day was disposed of in one working face. Four tippers, three dozers, and two compactors were witnessed operating in the center of Stage 5.

Item #17: Additional cover was observed being added to the inside slopes of Stages 3 and 5 and is expected to continue.

MISC: The leachate evaporator was in operation during the inspection.

Anthony Black
Signature Anthony Black

I Hereby acknowledge receipt of the Facility Copy of this report

Signature not requested
Individual in responsible charge

AFB 7/28/22
Signature/Date

Attachment 3

Transporter Documentation

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF MATERIALS MANAGEMENT

PART 364
WASTE TRANSPORTER PERMIT NO. MA-113

Pursuant to Article 27 ,Titles 3 and 15 of the Environmental Conservation Law and 6 NYCRR 364

PERMIT ISSUED TO:

GOULET TRUCKING, INC.
20 INDUSTRIAL DRIVE WEST
SOUTH DEERFIELD, MA 01373-0259

PERMIT TYPE:

☐ NEW
RENEWAL
☐ MODIFICATION
■

CONTACT NAME:	JEFFREY GOULET / CRYSTAL WILKINSON	EFFECTIVE DATE:	07/11/2022
COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY:

The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
Agri-Cycle of Washington County Inc	Buskirk , NY	Non-Hazardous Industrial/Commercial	
Albany (City) SWMF	Albany , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Allied Waste Niagara Falls Landfill	Niagara Falls , NY	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	
AMERICAN LANDFILL, INC.	WAYNESBURG , OH	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Ava Landfill	Boonville , NY	Non-Hazardous Industrial/Commercial	
Bath Sanitary Landfill	Bath , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
BAYSHORE RECYCLING	WOODBRIDGE , NJ	Non-Hazardous Industrial/Commercial	
Broome County Landfill	Binghamton , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil	

*** AUTHORIZED WASTE TYPES BY DESTINATION FACILITY LISTING (continued on next page) ***

NOTE: By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the Environmental Conservation Law, all applicable regulations, and the General Conditions printed on the back of this page.

ADDRESS:

New York State Department of Environmental Conservation
Division of Materials Management - Waste Transporter Program
625 Broadway, 9th Floor
Albany, NY 12233-7251

AUTHORIZED SIGNATURE: _____ Date: ____/____/____

WASTE TRANSPORTER PERMIT

GENERAL CONDITIONS

The permittee must:

1. Carry a copy of this waste transporter permit in each vehicle to transport waste. Failure to produce a copy of the permit upon request is a violation of the permit.

2. Display the full name of the transporter on both sides of each vehicle and display the waste transporter permit number on both sides and rear of each vehicle containing waste. The displayed name and permit number must be in characters at least three inches high and of a color that contrasts sharply with the background.

3. Transport waste only in authorized vehicles. An authorized vehicle is one that is listed on this permit.

4. Submit to the Department a modification application for additions/deletions to the authorized fleet of vehicles. The permittee must wait for a modified permit before operating the vehicles identified in the modification application.

5. Submit to the Department a modification application to add a new waste category or a new destination facility, or to change the current waste or destination facility category. The permittee must wait for a modified permit before transporting new waste types or transporting to new destination facilities.

6. Submit to the Department a modification application for change of address or company name.

7. Comply with requirements for placarding and packaging as set forth in New York State Transportation Law as well as any applicable federal rules and regulations.

8. Contain all wastes in the vehicle so there is no leaking, blowing, or other discharge of waste.

9. Use vehicles to transport only materials not intended for human or animal consumption unless the vehicle is properly cleaned.

10. Comply with requirements for manifesting hazardous waste, regulated medical waste, or low-level radioactive waste as set forth in the New York State Environmental Conservation Law and the implementing regulations. Transporters who provide a pre-printed manifest to a generator/shipper/ offeror of regulated waste shall ensure that all information is correct and clearly legible on all copies of the manifest.

11. Deliver waste only to transfer, storage treatment and disposal facilities authorized to accept such waste. Permittee must demonstrate that facilities are so authorized if requested to do so.

12. Maintain liability insurance as required by New York State Environmental Conservation Law.

13. Maintain records of the amount of each waste type transported to each destination facility on a calendar-year basis. The transporter is obligated to provide a report of this information to the Department at the time of permit renewal, or to any law enforcement officer, if requested to do so.

14. Pay regulatory fees on an annual basis. Non-payment may be cause for revocation or suspension of permit.

15. This permit is not transferrable. A change of ownership will invalidate this permit.

16. This permit does not relieve the permittee from the obligation to obtain any other approvals or permits, or from complying with any other applicable federal, state, or local requirement.

17. Renewal applications must be submitted no less than 30 days prior to the expiration date of the permit to:

New York State Department of Environmental Conservation
Division of Materials Management, Waste Transporter Program
625 Broadway, 9th Floor

Albany, NY 12233-7251

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF MATERIALS MANAGEMENT

PART 364
WASTE TRANSPORTER PERMIT NO. MA-113

Pursuant to Article 27 ,Titles 3 and 15 of the Environmental Conservation Law and 6 NYCRR 364

PERMIT ISSUED TO:

GOULET TRUCKING, INC.
20 INDUSTRIAL DRIVE WEST
SOUTH DEERFIELD, MA 01373-0259

PERMIT TYPE:

☐ NEW
RENEWAL
☐ MODIFICATION
■

CONTACT NAME:	JEFFREY GOULET / CRYSTAL WILKINSON	EFFECTIVE DATE:	07/11/2022
COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY: (Continued)
The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
Broome County Landfill	Binghamton , NY	Sludge from Sewage or Water Supply Treatment Plant	
Chaffee Landfill	Chaffee , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Waste Tires Sludge from Sewage or Water Supply Treatment Plant	
Chemung County Sanitary Landfill	Chemung , NY	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Chemung County Transfer Station	Elmira , NY	Asbestos	
CLEAN EARTH OF NORTH JERSEY	KEARNY , NJ	Hazardous Industrial/Commercial	
CLEAN EARTH OF SOUTHEAST PENNSYLVANIA	MORRISVILLE , PA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	
CLEAN HARBORS CLIVE, LLC	CLIVE , UT	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Hazardous Industrial/Commercial Universal Waste	
CLEAN HARBORS EL DORADO, LLC	EL DORADO , AR	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Hazardous Industrial/Commercial	
CLEAN HARBORS ENVIRONMENTAL	ARAGONITE , UT	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Hazardous Industrial/Commercial Universal Waste	
CLEAN HARBORS GRASSY MOUNTAIN, LLC	GRANTSVILLE , UT	Hazardous Industrial/Commercial	
CLEAN HARBORS LONE MOUNTAIN	WAYNOKA , OK	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Hazardous Industrial/Commercial	
CLEAN HARBORS OF CANADA	CORUNNA , ON	Hazardous Industrial/Commercial	
Clinton County Landfill	Morrisonville , NY	Non-Hazardous Industrial/Commercial Asbestos	

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
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TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY: (Continued)
The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
Clinton County Landfill	Morrisonville , NY	Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Colonie (T) SWMF	Colonie , NY	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Colonie RMW Transfer Station	Cohoes , NY	Asbestos	
Cortland County Landfill Westside Extension	McGraw , NY	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
COVANTA ENVIRONMENTAL SOLUTIONS	MYERSTOWN , PA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Hazardous Industrial/Commercial	
Covanta Niagara I, LLC	Niagara Falls , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil	
CWM CHEMICAL SERVICES LLC	MODEL CITY , NY	Hazardous Industrial/Commercial	
CWM EMELLE ALABAMA	EMELLE , AL	Hazardous Industrial/Commercial	
Delaware County SWMF	Walton , NY	Petroleum Contaminated Soil	
Dunn C&D LF	Rensselaer , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil	
ENGLOBE	TERREBONNE , QC	Hazardous Industrial/Commercial	
ENVIRITE OF PENNSYLVANIA	YORK , PA	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Hazardous Industrial/Commercial	
EQ DETROIT, INC (US ECOLOGY DETROIT SOUTH)	DETROIT , MI	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Hazardous Industrial/Commercial Universal Waste	
ESMI OF NEW HAMPSHIRE	LOUDON , NH	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
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TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY: (Continued)
The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
ESMI of New York	Fort Edward , NY	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	
Franklin County Regional Landfill	Constable , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Fulton County Landfill	Johnstown , NY	Non-Hazardous Industrial/Commercial Asbestos	
GLOBALCYCLE, INC.	E. TAUNTON , MA	Non-Hazardous Industrial/Commercial	
GRAND CENTRAL SANITARY LANDFILL	PEN ARGYL , PA	Non-Hazardous Industrial/Commercial	
Grasslands Composting Facility	Chateaugay , NY	Sludge from Sewage or Water Supply Treatment Plant	
Green Ridge RDF	Gansevoort , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
GREENTREE LANDFILL	KERSEY , PA	Non-Hazardous Industrial/Commercial	
GROWS LANDFILL NORTH (PA DEP 101680)	MORRISVILLE , PA	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil	
Hakes C&D Disposal Inc	Painted Post , NY	Asbestos	
High Acres Western Expansion Landfill	Fairport , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
Hyland Landfill	Angelica , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
KELLY RUN SANITATION Ind. Park)	ELIZABETH , PA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	

*** AUTHORIZED WASTE TYPES BY DESTINATION FACILITY LISTING (continued on next page) ***

		Petroleum Contaminated Soil
MBC Contractors Inc (Hudson River Views	Stony Point , NY	Non-Hazardous Industrial/Commercial
Ind. Park)		Petroleum Contaminated Soil

*** AUTHORIZED WASTE TYPES BY DESTINATION FACILITY LISTING (continued on next page) ***

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF MATERIALS MANAGEMENT

PART 364
WASTE TRANSPORTER PERMIT NO. MA-113

Pursuant to Article 27 ,Titles 3 and 15 of the Environmental Conservation Law and 6 NYCRR 364

PERMIT ISSUED TO:

GOULET TRUCKING, INC.
20 INDUSTRIAL DRIVE WEST
SOUTH DEERFIELD, MA 01373-0259

PERMIT TYPE:

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■

CONTACT NAME:	JEFFREY GOULET / CRYSTAL WILKINSON	EFFECTIVE DATE:	07/11/2022
COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY: (Continued)
The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
MICHIGAN DISPOSAL WASTE TREATMENT PLANT	BELLEVILLE , MI	Hazardous Industrial/Commercial	
Modern Landfill, Inc.	Model City , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
NAUGATUCK ENVIRONMENTAL TECHNOLOGIES	NAUGATUCK , CT	Sludge from Sewage or Water Supply Treatment Plant	
Ontario County Sanitary Landfill	Stanley , NY	Non-Hazardous Industrial/Commercial Asbestos Sludge from Sewage or Water Supply Treatment Plant	
RECUPERE SOL, INC.	SAINT AMBROISE , QC	Hazardous Industrial/Commercial	
REPUBLIC ENVIRONMENTAL SYSTEMS (PA) INC.	HATFIELD , PA	Asbestos Hazardous Industrial/Commercial	
Resoil	North Adams , MA	Petroleum Contaminated Soil	
SCHENECTADY (C) WPCP	SCHENECTADY , NY	Non-Residential Raw Sewage or Sewage-Contaminated Wastes	
Seneca Meadows LF	Waterloo , NY	Non-Hazardous Industrial/Commercial Asbestos Petroleum Contaminated Soil Waste Tires Sludge from Sewage or Water Supply Treatment Plant	
SHREWSBURY ASH LANDFILL	SHREWSBURY , MA	Non-Hazardous Industrial/Commercial	
SIGNATERRE ENVIRONMENTAL INC.	MASCHOCHE , QC	Hazardous Industrial/Commercial	
SOUTHBRIDGE RECYCLING AND DISPOSAL PARK	SOUTHBRIDGE , MA	Petroleum Contaminated Soil	
SOUTHERN ALLEGHENIES LANDFILL	DAVIDSVILLE , PA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	
SPECTRASERV, INC.	SOUTH KEARNY , NJ	Non-Hazardous Industrial/Commercial	
SPRINGFIELD - BONDI ISLAND LANDFIELD	AGAWAM , MA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Sludge from Sewage or Water Supply Treatment Plant	
STABLEX CANADA INC.	BLAINVILLE , QC	Hazardous Industrial/Commercial	
TRANS IND, INC.	CHESTER , VA	Non-Hazardous Industrial/Commercial Hazardous Industrial/Commercial	
TULLYTOWN LANDFILL (WASTE MANAGEMENT)	TULLYTOWN BURROUGH , PA	Asbestos	

*** AUTHORIZED WASTE TYPES BY DESTINATION FACILITY LISTING (continued on next page) ***

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF MATERIALS MANAGEMENT

PART 364
WASTE TRANSPORTER PERMIT NO. MA-113

Pursuant to Article 27 ,Titles 3 and 15 of the Environmental Conservation Law and 6 NYCRR 364

PERMIT ISSUED TO:

GOULET TRUCKING, INC.
20 INDUSTRIAL DRIVE WEST
SOUTH DEERFIELD, MA 01373-0259

PERMIT TYPE:

☐ NEW
RENEWAL
☐ MODIFICATION
■

CONTACT NAME:	JEFFREY GOULET / CRYSTAL WILKINSON	EFFECTIVE DATE:	07/11/2022
COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY DESTINATION FACILITY: (Continued)

The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
TULLYTOWN RESOURCE RECOVERY FACILITY (PA DEP 101494)	TULLYTOWN , PA	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil	
VEOLIA ES TECHNICAL SOLUTIONS, LLC	WEST CARROLLTON , OH	Non-Hazardous Industrial/Commercial Petroleum Contaminated Soil Hazardous Industrial/Commercial Universal Waste	
WAYNE DISPOSAL, INC	BELLEVILLE , MI	Asbestos Hazardous Industrial/Commercial	
Wheelabrator Hudson Falls	Hudson Falls , NY	Non-Hazardous Industrial/Commercial Waste Tires	

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COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED VEHICLES:
The Permittee is Authorized to Operate the Following Vehicles to Transport Waste:

(Vehicles enclosed in <>'s are authorized to haul Residential Raw Sewage and/or Septage only)

156 (One Hundred and Fifty Six) Permitted Vehicle(s)

MA 12L7	ME 271376C	ME 2826486	ME 2928068
MA 79408	ME 271377C	ME 2826487	ME 2928073
MA 88189	ME 271387C	ME 2826488	ME 2928074
MA 88578	ME 271389C	ME 2826489	ME 2938453
ME 2102716	ME 271392C	ME 2826490	ME 2938454
ME 222807A	ME 271399C	ME 2826491	ME 2938455
ME 2375169	ME 271400C	ME 2826497	ME 2938456
ME 2375177	ME 271401C	ME 2826498	ME 2940498
ME 2375349	ME 271402C	ME 2826499	ME 2941497
ME 2470222	ME 271406C	ME 2826500	ME 2943835
ME 2470372	ME 271407C	ME 2826501	ME 2949391
ME 2572604	ME 271409C	ME 2826504	ME 2951869
ME 2572605	ME 271410C	ME 2826505	ME 2951870
ME 2572606	ME 271411C	ME 2826506	ME 2953669
ME 2572607	ME 271412C	ME 2826507	ME 3046517
ME 2572608	ME 271413C	ME 2826508	ME 3046518
ME 2572609	ME 271414C	ME 2826509	ME 3217893
ME 2572610	ME 271416C	ME 2826512	ME 3319931
ME 2572611	ME 271417C	ME 2826515	ME 5028759
ME 2572616	ME 271418C	ME 2826516	ME 5028760
ME 2572617	ME 271419C	ME 2826517	ME 5102717
ME 2572618	ME 271421C	ME 2826518	End of List
ME 2572620	ME 271422C	ME 2826519	
ME 2572621	ME 271423C	ME 2826520	
ME 2572622	ME 271424C	ME 2826521	
ME 2572623	ME 271425C	ME 2826522	
ME 2572624	ME 271426C	ME 2826523	
ME 2576692	ME 271427C	ME 2826524	
ME 2576693	ME 271428C	ME 2826527	
ME 2577504	ME 271429C	ME 2829908	
ME 2577505	ME 271430C	ME 2829966	
ME 2577506	ME 271433C	ME 2829967	
ME 2577507	ME 271434C	ME 2830622	
ME 2577508	ME 271436C	ME 2830623	
ME 259460A	ME 271957F	ME 2831378	
ME 2649428	ME 272738F	ME 2840158	
ME 2649429	ME 272739F	ME 2846531	
ME 2649430	ME 274316F	ME 2846532	
ME 2649431	ME 274317F	ME 2846533	
ME 2649432	ME 274318F	ME 2846534	
ME 2649433	ME 274319F	ME 2855992	
ME 271370C	ME 277570D	ME 2913053	
ME 271372C	ME 279473C	ME 2918403	
ME 271373C	ME 2826484	ME 2918404	
ME 271374C	ME 2826485	ME 2918405	

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION

PART 381
WASTE TRANSPORTER PERMIT NO. MA-113

Pursuant to Article 27 ,Title 3 of the Environmental Conservation Law and 6 NYCRR 381

PERMIT ISSUED TO:

GOULET TRUCKING, INC.
20 INDUSTRIAL DRIVE WEST
SOUTH DEERFIELD, MA 01373-0259

PERMIT TYPE:

D NEW
D RENEWAL
■ **MODIFICATION**

CONTACT NAME:	JEFFREY GOULET/ CRYSTAL WILKINSON	EFFECTIVE DATE:	09/22/2022
COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED WASTE TYPES BY TREATMENT, STORAGE & DISPOSAL FACILITIES:

The Permittee is Authorized to Transport the Following Waste Type(s) to the Destination Facility listed :

Destination Facility	Location	Waste Type(s)	Note
STEELWAYS, INC.	NEWBURGH , NY	Low-Level Radioactive Waste (LLRW) Mixed Waste (LLRW mixed with Hazardous Waste)	

NOTE: By acceptance of this pem,it, the pem,ittee agrees that the pem,it is contingent upon strict compliance with the Environmental Conservation Law, all applicable regulations, and the General Conditions printed on the back of this page.

ADDRESS:

New York State Department of Environmental Conservation
Division of Materials Management
Radioactive Materials Management Section
625 Broadway, 9th Floor
Albany, NY 12233-7255

AUTHORIZED SIGNATURE: Laura Stevens Digitally signed by Laura Stevens Date: 2022.09.20 08:59:18 -04'00' Date:____/____/____

WASTE TRANSPORTER PERMIT

GENERAL CONDITIONS

The permittee must:

1. Carry a copy of this waste transporter permit in each vehicle used to transport waste. Failure to produce a copy of the permit upon request is a violation of the permit.

2. Display the full name of the transporter on both sides of each vehicle and display the waste transporter permit number on both sides and rear of each vehicle containing waste. The displayed name and permit number must be in characters at least three inches high and of a color that contrasts sharply with the background.

3. Transport waste only in authorized vehicles. An authorized vehicle is one that is listed on this permit.

4. Submit to the Department a modification application for additions/deletions to the authorized fleet of vehicles. The permittee must wait for a modified permit before operating the vehicles identified in the modification application.

5. Submit to the Department a modification application to add a new waste category or a new destination facility, or to change the current waste or destination facility category. The permittee must wait for a modified permit before transporting new waste types or transporting to new destination facilities.

6. Submit to the Department a modification application for any change to the permit.

7. Comply with requirements for placarding and packaging as set forth in New York State Transportation Law as well as any applicable federal rules and regulations.

8. Contain all wastes in the vehicle so there is no leaking, blowing, or other discharge of waste.

9. Use vehicles to transport only materials not intended for human or animal consumption unless the vehicle is properly cleaned.

10. Comply with requirements for manifesting hazardous waste, regulated medical waste, or low-level radioactive waste as set forth in the New York State Environmental Conservation Law and the implementing regulations. Transporters who provide a pre-printed manifest to a generator/shipper/ offeror of regulated waste shall ensure that all information is correct and clearly legible on all copies of the manifest.

11. Deliver waste only to transfer, storage, treatment and disposal facilities authorized to accept such waste. Permittee must demonstrate that facilities are so authorized if requested to do so.

12. Maintain liability insurance as required by New York State Environmental Conservation Law.

13. Maintain records of the amount of each waste type transported to each destination facility on a calendar - year basis. The transporter is obligated to provide a report of this information to the Department by March 1 of each year.

14. Pay regulatory fees on an annual basis. Non-payment may be cause for revocation or suspension of permit.

15. This permit is not transferrable. A change of ownership will invalidate this permit.

16. This permit does not relieve the permittee from the obligation to obtain any other approvals or permits, or from complying with any other applicable federal, state, or local requirement.

17. Renewal applications must be submitted no less than 30 days prior to the expiration date of the permit to:

New York State Department of Environmental Conservation
Division of Materials Management, Waste Transporter Program
625 Broadway, 9th Floor
Albany, NY 12233-7251

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL REMEDIATION

PART 381
WASTE TRANSPORTER PERMIT NO. MA-113

Pursuant to Article 27 ,Title 3 of the Environmental Conservation Law and 6 NYCRR 381

PERMIT ISSUED TO:

GOULET TRUCKING, INC.
20 INDUSTRIAL DRIVE WEST
SOUTH DEERFIELD, MA 01373-0259

PERMIT TYPE:

D NEW
D RENEWAL
■ MODIFICATION

CONTACT NAME:	JEFFREY GOULET/ CRYSTAL WILKINSON	EFFECTIVE DATE:	09/22/2022
COUNTY:	OUT OF STATE	EXPIRATION DATE:	**11/30/2022**
TELEPHONE NO:	(413)665-1329	US EPA ID NUMBER:	MAC300006038

AUTHORIZED VEHICLES:
The Permittee is Authorized to Operate the Following Vehicles to Transport Waste:

(Vehicles enclosed in <>'s are authorized to haul Residential Raw Sewage and/or Septage only)

152 (One Hundred and Fifty Two) Permitted Vehicle(s)

MA 12L7	ME 271389C	ME 2826489	ME 2941497
MA 1AA48R	ME 271392C	ME 2826490	ME 2943835
MA 79408	ME 271396C	ME 2826497	ME 2949391
MA88189	ME 271399C	ME 2826498	ME 2951869
MA88578	ME 271400C	ME 2826499	ME 2951870
ME 2102716	ME 271401C	ME 2826500	ME 2953669
ME 222807A	ME 271402C	ME 2826501	ME 3046517
ME 2353038	ME 271406C	ME 2826505	ME 3046518
ME 2375169	ME 271407C	ME 2826506	ME 3237888
ME 2375177	ME 271409C	ME 2826507	ME 5028759
ME 2375349	ME 271410C	ME 2826508	ME 5028760
ME 2470222	ME 271411C	ME 2826509	ME 5039704
ME 2470372	ME 271412C	ME 2826512	ME 5102717
ME 2572604	ME 271413C	ME 2826515	ME 5117157
ME 2572605	ME 271414C	ME 2826516	ME 5117158
ME 2572606	ME 271416C	ME 2826517	ME 5117159
ME 2572607	ME 271417C	ME 2826518	ME 5117160
ME 2572608	ME 271418C	ME 2826519	End of List
ME 2572609	ME 271419C	ME 2826520	
ME 2572610	ME 271421C	ME 2826521	
ME 2572611	ME 271422C	ME 2826522	
ME 2572616	ME 271423C	ME 2826523	
ME 2572617	ME 271424C	ME 2826524	
ME 2572618	ME 271425C	ME 2826527	
ME 2572620	ME 271427C	ME 2829908	
ME 2572621	ME 271428C	ME 2829966	
ME 2572622	ME 271429C	ME 2829967	
ME 2572623	ME 271430C	ME 2831378	
ME 2572624	ME 271433C	ME 2840158	
ME 2576692	ME 271434C	ME 2846531	
ME 2576693	ME 271436C	ME 2846532	
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ME 2649429	ME 272738F	ME 2846534	
ME 2649430	ME 272739F	ME 2855992	
ME 2649431	ME 274316F	ME 2918403	
ME 2649432	ME 274317F	ME 2918404	
ME 2649433	ME 274318F	ME 2918405	
ME271370C	ME 274319F	ME 2928068	
ME271372C	ME 277570D	ME 2928073	
ME 271373C	ME 279473C	ME 2928074	
ME271374C	ME 2826484	ME 2938453	
ME 271376C	ME 2826485	ME 2938454	
ME271377C	ME 2826486	ME 2938455	
ME271385C	ME 2826487	ME 2938456	
ME 271387C	ME 2826488	ME 2940498	