

EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) is submitted by Abington Transfer Station, LLC (ATS) for the proposed construction and operation of 1) a solid waste transfer station on a 6.9 acre parcel located at 1477 Bedford Street in Abington, Massachusetts (the ATS parcel) and 2) a solid waste vehicle and equipment storage and light maintenance facility located on a 24 acre abutting parcel owned by Brendan Realty Trust (the BRT parcel).

A 4.4 acre section of the ATS parcel has received site assignment under the Massachusetts Department of Environmental Protection (DEP) Solid Waste Site Assignment Regulations, 310 CMR 16 by both DEP and the Town of Abington Board of Health, as required. It is currently occupied by a 7,750 sf building designed for solid waste operations and associated vehicle maintenance. The 2.5 acre balance of the ATS parcel is not and will not be site assigned since it will not be used for handling solid waste as defined under the DEP regulations. It is being transferred to the ATS parcel from the abutting BRT parcel to provide increased environmental mitigation measures, including increasing the size of the originally approved storm water management system.

Since the abutting BRT parcel will be used for storage and light maintenance of solid waste hauling equipment only and will not be used for the handling of solid waste as defined under the DEP regulations, no solid waste site assignment or permit is required or will be requested. This parcel is the site of an old drive-in cinema which has been abandoned for well over 20 years. Site preparation is currently underway on the BRT parcel for the construction of the vehicle and equipment storage and light maintenance facility.

The 4.4 acres of the 6.9 acre ATS property have been site assigned to process 1,800 tons per day (tpd) of solid waste. Based upon the DEP Solid Waste Master Plan, it is assumed that the ATS solid waste stream will be made up of 1,200 tpd of municipal solid waste (MSW) and 600 tpd of construction and demolition material (C&D). The MSW will include about 100 tpd of mixed recyclable material (plastic, glass containers, metal cans and paper products).

The waste will be delivered in packer and roll-off trucks and other medium-sized vehicles. The MSW will be immediately placed in open top trailer trucks for transport to solid waste incinerators or landfills. C&D material will be handled initially by sorting out large items of wood, metal or other materials. These sorted materials will be placed in roll-off containers for recycling at processing facilities. The remainder of the C&D materials will be placed in open top trailers for transport to C&D material handling facilities or to landfills. The presorted recyclables will be placed in separate containers for each material type and then transported to recycling facilities for subsequent processing.

All waste handling operations will be conducted within the enlarged, specially designed building to insure that potential environmental impacts from operations are reduced to the minimum. Surface water and groundwater protection systems will be constructed and maintained in accordance with DEP Best Management Practices. Any water from the packer and roll off trucks that reaches the

floor inside the building will be collected in a closed drainage system and will not discharge to groundwater or surface waters. In addition to complying with the rigorous solid waste permitting process, the Facility will be required to obtain and comply with numerous other state and local permits.

ATS is proposing the 1,800 tons per day (tpd) capacity of the solid waste transfer and recycling Facility because of the demand for this size and type of facility in the South Shore area. There are currently very few municipal or commercial landfills that remain open within the service area (Eastern Massachusetts) of the Facility. Since DEP cannot permit additional disposal capacity, many municipal and commercial solid waste generators and haulers have to travel great distances to disposal facilities or recycled material users, many of which are located out of state. Even if the DEP were to lift its moratorium on permitting new or expanded solid waste disposal facilities to meet the anticipated shortfall that the DEP's Master Plan identifies for the year 2000, it will take several years for those facilities to be permitted and operational, assuming any can be permitted. Significant growth is anticipated in the area of the proposed Facility, such as the proposed mixed use development of the South Weymouth Naval Air Station which is within one half mile of the ATS site. With the uncertainty of future regional disposal capacity in a growing area of the state, a transfer station of sufficient capacity will be an important component in the region's economy and infrastructure and necessary to insure long term environmental protection.

While an 1,800 ton per day solid waste transfer station has a relatively high permitted capacity, the proposed ATS transfer station will **not** be the largest solid waste management facility in New England, as has been stated by others, nor will it be the largest facility in eastern Massachusetts. There are at least seven solid waste management facilities, excluding landfills, in eastern Massachusetts that are in effect permitted at 1,500 tons per day or more.

ECONOMIC BENEFITS

The Abington Transfer Station will provide a significant increase in revenue to the Town of Abington. This increased revenue will come from two conditions that were negotiated by the Abington Board of Health when it issued the ATS Site Assignment in April 1999.

Unlike commercial landfills and combustion facilities, solid waste handling facilities are not required to and usually do not pay a host community fee. ATS, however, agreed to the Board of Health condition that it pay a sliding fee, based on actual daily tonnage handled by the Facility. In accordance with Condition No. 1 of the Site Assignment, ATS will pay the Town of Abington \$1.10 per ton of materials that is received by the Facility where the total tons per day is up to a total of 799 tons. If the daily total volume of waste received at the facility is between 800 and 1,199 tons, then ATS will pay the Town \$1.20 for each ton. If the daily total tonnage is between 1,200 and 1,800 tons, ATS will pay \$1.40 for each ton received that day. Within Condition No. 1 there is an escalator clause for the fee rates, based on the percentage increase in the Boston Consumer Price Index. Between March 1990 and March 2000 this Index increased by approximately 34% or at an average annual rate of about 3.4%. Condition No. 1 also stipulates that this fee "shall be in lieu of all new

taxes, fees, charges or assessments . . . except for real estate taxes imposed solely upon the land on which the facility is located.” This essentially means that the ATS site will pay property taxes on the current assessed value of the land, and not on any improvements to the building or equipment that is used at the Facility.

The second revenue source was also negotiated with the Abington Board of Health and is guaranteed by Condition No. 7 of the ATS Site Assignment. In this Condition the Board of Health has required ATS to offer the Town the lowest current price charged by ATS with a further discount of 20%. According to the DEP’s 1997 Solid Waste Master Plan, the Town of Abington produces approximately 6,800 tons per year (tpy) of solid waste. At a 20% reduction from what is currently a very competitive handling and disposal fee of \$75.00 per ton, the Town will save \$15.00 per ton of solid waste. This results in a savings of approximately \$102,000 per year (6,800 tpy X \$15.00/ton), but may in fact produce a significantly greater savings. Under the Town of Abington’s current contract to collect, haul and dispose of residential solid waste, the cost is going to increase to \$123.60 per ton by July 2000. Assuming, conservatively, that the Town costs for curbside collection, transportation to the ATS facility, and the ATS charges for transportation and disposal at the 20% discount rate will be about \$90.00 per ton, the Town will save approximately \$33.60 per ton (\$123.60 - \$90.00 per ton) or about \$228,480 per year (\$33.60 per ton X 6,800 tpy).

If the ATS Facility operates at its permitted capacity of 1,800 tons per day for 300 days per year (six days per week, minus holidays), the Town of Abington would realize an increase in revenue of approximately \$984,000 for the first year of operations and approximately \$1,242,000 for the eleventh year (after the ten years) of operations. However, it is not likely that the ATS facility will operate at or near the 1,800 tons per day capacity, except for a few days per year. It is more likely that a high average for waste handling at the ATS facility will be about 1,200 tons per day and a low average will be about 900 tons per day. At these average waste receiving rates, the Town will realize respective annual increased revenues of between \$732,000 and \$552,000 for the first year of operation, and between \$904,000 and \$663,000 for the eleventh year of operations.

ENVIRONMENTAL IMPACTS

As with any industrial activity, a solid waste handling operation has the potential for adverse environmental impacts, as materials are brought to and transferred from the site, and processed at the site. However, adequate and appropriate design and operating procedures can substantially mitigate, if not eliminate entirely, these impacts. Current regulatory requirements, best engineering judgment, and good business practices will result in a solid waste management facility at the ATS parcel and a vehicle maintenance and storage facility at the BRT parcel that are environmentally sound.

The Secretary of Environmental Affairs’ January 7, 2000 Certificate identified the issues that were to be studied in this EIR (i.e. the Scope). These issues are summarized as follows:

- DEP Permitting Process - Facility Design and Operation,
- Traffic,

- Drainage,
- Noise,
- Nuisance Conditions of Odor, Vermin and Litter and
- Mitigation.

This executive Summary is intended to provide a comprehensive synopsis of the facility description, environmental assessment and proposed mitigation measures set forth in the full EIR.

FACILITIES DESIGN

ABINGTON TRANSFER STATION (ATS) DESIGN

Improvements to be made to the existing structure will include the construction of a 32,000 square foot, four bay building addition for the solid waste transfer station and recycling facility tipping floor and trailer loading areas. Site improvements will include the installation of a chain link fence around the entire operation, the addition of multiple truck scales to be used for weighing incoming and outgoing loads, site grading, paving, and extensive stormwater controls. Utility improvements will include extensions and increased capacity of electric and water services, a floor drainage collection system which will discharge to the public sewer system, and an underdrain system which will control groundwater elevations in the area of the transfer station structure in order to satisfy regulatory design criteria.

Solid Waste Recycling and Transfer Station Facility

A single clear-span, 32,000 square foot, metal-frame building expansion will enclose the Facility. The clear span ceiling height will be approximately 26 feet within the building. The proposed building expansion will connect to the east wall of the existing vehicle maintenance building. The transfer station building will be equipped with roll-up doors on four bays along the north side of the building, where transfer trailer trucks will enter and receive waste from the tipping floor. The tipping floor entrances and exits along the south side of the proposed building, which are for the trucks that are bringing waste to the transfer station, will also have roll-up doors.

The building is designed with four waste handling bays with a continuous tipping floor for dumping and handling the waste. The tipping floor of the facility will be of reinforced concrete and will have floor drains that will collect incidental drippings from the trucks or waste that is brought into the building and floor wash water. These floor drains will discharge to a contained system which will not discharge to surface waters or the environment. Fifteen foot (15') high concrete push walls will be constructed between each of the tipping floor area bays and partially in front of the transfer trailer bays.

Lighting of the working area will be provided by translucent panels in the roof and lights suspended from the ceiling and mounted on the walls. Heat and smoke sensors and other equipment that may

be required by the appropriate building code will be provided. The tipping floor area will not be heated. Man doors will be provided for access by authorized personnel. Fire protection will be provided by hydrants located on the public water system on Route 18, by fire extinguishers that are to be provided throughout the Facility, and by a small diameter yard hydrant system located in the proposed building.

Vehicle Scales

Three vehicle scales will be installed on the property. The three scales are intended to facilitate the flow of traffic for the 1,800 tons per day capacity.

Roadway Improvements

The existing driveway to Route 18 will be abandoned. A new entrance of the driveway will be created just north of the approximate middle of the Route 18 frontage. The width will be 40 feet with a dividing island and exit radii will be increased to fifty feet (50'), in accordance with MHD requirements. In response to requests made by MHD and the Towns of Abington and Weymouth during previous MEPA review, ATS is proposing to widen the north and southbound lanes of Route 18 along and to a few hundred feet north and south of the Site, as acceleration/de-acceleration/passing lanes. Adequate parking will be provided for 25 employee and visitor automobiles. During operating hours there is sufficient area to park 5 transfer trailers and 20 roll-off containers, with out interference to operations, on ATS property. During non-operating hours there will be additional area to store 20 transfer trailers or 40 roll-off containers within the building.

Stormwater Management

The ATS site's stormwater management system will be improved by adding new drainage structures (catch basins, pipes and manholes), and constructing sedimentation/detention basins which will provide Best Management Practices (BMP) for stormwater treatment and control. Catch basins in the yard area of the site will be constructed with deep sumps and hooded outlets to provide oil/gas separation. Trench drains will be constructed along the outside entrance to the transfer trailer bays. Roof drains from the proposed building will be provided with direct connections to the storm system. The existing drainage system along Route 18 will not be significantly changed, nor will the runoff characteristics from this area significantly change since there will be relatively minor alterations to impervious area.

The proposed stormwater collection system will discharge to a three stage sedimentation basin system that will be constructed at the eastern limit of the site. The three stage basin system will consist of two structural components; the first stage and structural component will be a sediment forebay to remove a majority of sediment; the second structural component will include the second stage permanent wet pond and third stage extended detention pond. The system will ultimately discharge to the wetlands along the eastern edge of the site. The sedimentation pond system will serve two purposes: 1) to control post-development stormwater run-off rates to below pre-development rates

(quantity), and 2) to capture sediment in the stormwater collected through the drainage system (quality).

Building and Groundwater Drains

Grading and strategic placement of floor drains, as shown in the design plans, eliminate the possibility of liquids from the waste handling areas discharging to the environment. This design, using conventional engineering applications, provides complete assurance of the elimination of potential discharges of contaminated materials to groundwater or surface water. Liquids that may collect on the tipping floor and in the trailer bay areas will be collected in a series of floor drains, which are basically catch basins. The water collected in the floor drain system will flow by gravity through a system of pipes and manholes to a pump station located in the approximate northeast corner of the site. The pump station will discharge the collected floor drain water through a force main to the site's sanitary sewer service connection, for discharge to the public sewer.

In order to comply with DEP's Site Assignment Regulation Site Suitability Criteria (310 CMR 16.40) requirements for a two foot vertical separation between high groundwater and the area where waste handling is to occur, an underdrain system is proposed which will lower the groundwater table.

Utilities

The existing electric power system will be upgraded to accommodate the requirements of the planned improvements, if needed. High intensity lighting will be provided, both inside and outside the proposed building for security and operational purposes.

Water for domestic uses and fire and dust suppression will be provided to the facility by the municipal water distribution system. Frost-proof yard hydrants will be provided in the waste handling area of the facility.

Sanitary wastewater will be handled by the use of the existing service connection to the public sewer that is located along Bedford Street (Route 18).

Air Quality Controls

The primary and most effective air quality control will be the construction of the transfer station's structural building and the conduct of all solid waste handling operations within that structure. The conduct of waste handling operations within the enclosing structure will sufficiently reduce the dispersion of potential adverse impacts associated with air quality, such as dust, odors and noise, to a point where no detectable impact to receptors will occur.

In addition to the primary air quality control of conducting all solid waste operations inside the transfer station building there are other controls that will be used to reduce adverse impacts to air quality. Dust will be controlled by the application of water to a waste load that is dusty. Yard

hydrants are being provided in the transfer station building for this purpose. The hoses will also be used to wash down the tipping floor periodically to reduce dust generation. Additional controls for odor will be provided by the spot application of odor suppressants. There are several commercially available products that can be applied to wastes by portable, containerized application systems or by fixed nozzle systems. ATS has also developed contingency plans for additional air quality controls. A high rate ventilation and dust removal system can be retrofit into the transfer station structure.

BRENDAN REALTY TRUST (BRT)

Improvements to be made to the BRT parcel, the site of the former Abington Drive-In Theater, will be to construct a facility for the operation of a vehicle storage and light maintenance facility for a solid waste hauling company. There will be no solid waste handling operations conducted on the BRT parcel, thus there are no solid waste permits required for this property. There are no MEPA thresholds that have been identified for the project proposed on the BRT parcel.

The site is being developed consistent with the plan approved by the Abington Conservation Commission in their Order of Conditions issued in the Spring of 1999. A pre-engineered building, between 16,000 and 20,000 square feet will be constructed, which will include between 1,000 and 2,000 square feet of administrative office space. Impervious site improvements (building and pavement) will cover an approximate area of 2.25 acres. A significant portion of this area was previously paved for the former use as a Drive-In Theater. The site will be serviced by public water from Adam Street (Route 58) and public sewer by an on-site pump station and a force main across ATS property to the existing sewer line on Bedford Street (Route 18).

FACILITIES OPERATIONS

Many of the specific operations and maintenance practices have already been developed for the ATS and BRT facilities since these projects have been in the permitting approval process for a long time. Previous permitting activities have resulted in the establishment of performance standards and a demonstration that those standards will be achieved. Previous regulatory approvals that have been obtained by ATS are MEPA certification, a positive Site Suitability Report from DEP, a Site Assignment from the Abington Board of Health, a draft Authorization to Construct (Permit) from DEP and an Order of Conditions from the Abington Conservation Commission. BRT has an Order of Conditions from the Abington Conservation Commission.

ABINGTON TRANSFER STATION

The following general operational requirements apply to recycling and waste handling operations, as outlined in 310 CMR 19.000, DEP's Solid Waste Management Regulations.

Compliance and Inspection Plan (310 CMR 19.030 (3)(c)4.e.)

To ensure that the operation of the facility is in compliance with its permit and all applicable regulations, a compliance and inspection program will be implemented at the Facility. Essentially,

the inspection program will be performed on a continuous basis by the full time staff, under the direction of the Facility Manager. In addition to the operator-performed inspections, an independent engineer, familiar with solid waste handling operations, will perform regularly scheduled bi-monthly inspections of the Facility. The engineer will prepare a report of each inspection, which will be submitted to the Town of Abington Board of Health and the DEP. In addition to the operator's inspections, the Abington Board of Health and DEP have unrestricted access to the facility during normal working hours, to conduct independent inspections of the operations. DEP regularly inspects all solid waste handling facilities that are under its jurisdiction and may conduct enforcement actions as a result of these inspection programs. The Abington Board of Health has similar enforcement powers over solid waste management facilities.

Equipment (310 CMR 19.205)

Movement and consolidation of solid wastes will be accomplished using front end loaders and, probably, a grapple loader as well. The equipment will be used for pulling wood, metals and recyclables from the C&D material loads. Loading and compaction of the transfer trailers will be accomplished using the front-end loaders. Roll-off containers will be provided on the tipping floor to store materials sorted out of the deposited waste loads.

Weighing Facility (310 CMR 19.206)

Three vehicle scales will be installed on the ATS site. The scale instruments and indicator for the incoming loads will be located in a scale house that is to be between the two scales. The instruments for the out-going scales (on north side of building) will also be in the scale house. Direct communication between the scale house and the vehicles on the out-going scale will be by intercom and possibly by video camera. The scales will be used to account for all waste material and recyclables handled by the facility.

Fire Protection (310 CMR 19.207)

Primary fire protection for the facility is provided by a fire hydrant, connected to the municipal water distribution system, located approximately 600 feet north of the site at the Weymouth town line. The fire protection system will be supplemented with frost-proof yard hydrants located inside the waste handling building. Heat and smoke detectors will be installed in the structures, in accordance with Building Code requirements. Equipment operating on the tipping floor will also be equipped with fire extinguishers.

Facility Access (310 CMR 19.208)

Based upon ATS's most recent discussions with the MHD, the primary access to the transfer station will be the modified driveway opening on Route 18. All vehicles will use this driveway to enter the facility. Vehicles using the facility will also use this driveway as an exit. The revised access to the facility will be a divided, 40 foot wide drive that is to be located approximately 140 feet north of the existing access driveway, which is to be abandoned. Additionally, ATS has recommended and is working with the MHD to provide widening of both the north and southbound lanes of Route 18 along the site's road frontage and for several hundred feet to the north and south of the Facility. A locking gate will be provided to restrict access to the site during non-operational hours.

Recently the MHD unveiled plans for access improvements that are associated with the redevelopment of the South Weymouth Naval Air Station. These plans, as they have been initially presented, include the widening of Route 18 to a minimum of four lanes, from south of the ATS facility to the Route 3 interchange and the construction of a direct access road from Route 3 to Route 18 at the northern property line of the ATS property. These proposed highway improvements are in the initial planning stages and must endure significant review before they can be finalized. Whatever the detailed layout of these improvements are, they will significantly, if not completely, mitigate impacts of increased traffic generation from the transfer station to Route 3.

Unloading Refuse (310 CMR 19.209)

All refuse will be unloaded inside the transfer station building, under the supervision of the facility personnel. The requirement that all solid waste handling operations are to be within the closed structure, is the primary mitigation measure for any potential impacts that may be associated with those operations.

Wind-Blown Litter Control (310 CMR 19.210)

All vehicles transporting loads of solid wastes or recyclables to and from the transfer station will be required to be covered to prevent incidental litter. This is a state law and is subject to enforcement by any state or local police department, as a traffic violation. All solid waste handling and transfer operations will be conducted within the building. The building is the primary mitigation measure which will drastically reduce the potential for wind blown litter. Additionally, facility personnel will routinely police the premises, adjoining properties, and Route 18 for any litter that may result from ATS operations.

Screen and Fencing (310 CMR 19.211)

Fencing will be provided around the entire ATS operations area. There will be a gate for the fence, at each of the access ways to the transfer station. There will also be tree plantings along the front (Route 18) side of the property to screen the operations from public view. The final location of plantings will be dependent on the final site access alignment.

Open Burning (310 CMR 19.212)

No open burning will be allowed on the grounds of the transfer station.

Special Wastes (310 CMR 19.213)

The transfer station is designed to handle municipal solid waste (MSW), commercial waste, construction and demolition (C&D) waste and recyclable materials. No special wastes, as defined in 310 CMR 19.061, will be accepted unless expressly authorized by the DEP and the Town of Abington Board of Health.

Bulky Wastes (310 CMR 19.214)

The Facility will not accept bulky wastes which cannot be readily handled or reduced in size using the facility's equipment in its usual manner. The Facility will, however, accept waste wood and metal, as well as other C&D waste from which recyclables can be extracted.

Recycling Operations (310 CMR 19.215)

Recycling operations will be performed in accordance with subsequent sections.

Dust Control (310 CMR 19.216)

Dust will be minimized by conducting all waste handling operations inside the proposed transfer station building; constructing pavement within the area of operations, and constructing a storm water collection system. Conducting solid waste handling operations inside the proposed building is the primary mitigation measure for dust and several other potential impacts. The structure will cut off a means of impact migration or dispersion by limiting exposure of the impacts to the natural elements. The site driveways and yard areas will be swept on a routine basis. The tipping floor of the transfer station will be swept and hosed down on a regular basis, to remove accumulated dirt and dust. Dust from recycling and waste handling operations within the building will be suppressed by applying small amounts of water from the yard hydrants to dry or dusty loads.

Insect and Rodent Control (310 CMR 19.217)

At the close of each operating day, all refuse will be removed from the tipping floor and loaded into the appropriate transfer trailers. Partially full trailers will remain in the building overnight. The tipping floor will be swept clean. No refuse will be left on the tipping floor overnight. The tipping floor will be washed regularly, as conditions warrant, to prevent the development of conditions conducive to the presence of rodents, insects, or other vermin. The transfer station will be regularly inspected by a person experienced in the control and extermination of insects and rodents. If applications of pesticides and rodenticides are necessary, this will be carried out by a licensed exterminator. ATS will engage the services of an exterminator to conduct monthly extermination services.

Accident Prevention and Safety (310 CMR 19.218)

All personnel employed to perform work associated with the operation of the ATS facility will be experienced in waste handling and will be aware of the operational procedures necessary to prevent accidents. No persons other than the equipment operators, spotters (inspectors) and the Facility Manager will be allowed on the tipping floor at any time.

Supervision of Operations (310 CMR 19.219)

Operations will be carried out under the overall supervision and direction of the Facility Manager or other representatives of ATS. A copy of the approved Facility Operations Plan, and a copy of 310 CMR 19.000, Part III: Transfer Station Design and Operation Standards, will be kept on site and accessible at all times.

Operational Records and General Administration (301 CMR 19.220)

The Operator will be responsible for running the Facility in compliance with Section 150A of Chapter 111 of the Massachusetts General Laws and all other applicable laws, rules, regulations and ordinances of the Commonwealth, the Town of Abington, and any other authority having jurisdiction.

Emergency Plan (310 CMR 19.221)

In the event of a breakdown of the Facility equipment resulting in the inability of the Operator to effectively transfer refuse, temporary replacement equipment will be provided under contract with a local equipment supplier or contractor. If, for some unforeseen reason, the facility is unable to operate normally, it will be closed and incoming vehicles will proceed directly to disposal facilities.

Employee Training

ATS will provide informational training for all employees on the newest disposal restrictions as well as refresher training on existing restrictions.

Enforcement Provisions

Periodic inspections of the ATS Facility will be made by representatives of the DEP, the Abington Board of Health, and other regulatory agencies. Written notice of any deficiencies and recommendations may be provided by the inspecting agency to the Operator, who will then have the responsibility to correct any deficiencies in order to ensure continued operation in compliance with all applicable laws, rules, regulations and ordinances.

Hours of Operation

The proposed facility will operate (i.e., accept in-coming waste) six days per week (Monday through Saturday), from 6:00 a.m. to 6:00 p.m. Clean up operations will be conducted after the scheduled operating hours each day.

Waste Control Plan

All communities and private waste haulers using the transfer station will be informed of the limitations on acceptable waste. All waste categorized as hazardous, whether in solid, liquid or gaseous form, is explicitly prohibited from the transfer station. In addition, special waste listed at 310 CMR 19.061 will not be handled at the station.

Waste materials subject to controls under 310 CMR 19.017 may require special handling due to restrictions on disposal and transfer for disposal, and are to be considered unacceptable for waste transfer to landfills or combustion facilities. However, as most of these materials are part of the usual municipal solid waste stream, ATS will likely be faced with handling these materials in the incoming waste loads. Recent (October 1999) changes to the DEP's Solid Waste Management Regulations at 310 CMR 19.017 include transfer stations as being responsible for the enforcement of waste controls, thus ATS must comply with the regulations.

All facility personnel will be trained to recognize and handle unacceptable waste. It will primarily be the responsibility of the hauler to remove any unacceptable materials (including hazardous materials) from the Facility. To ensure that unacceptable materials are not accepted, the waste loads will be inspected at several points.