

Spill Control Plan

June 6, 2022

Biosolids shall be trucked to the Saratoga Biochar Solutions, LLC, facility (“SBS Facility”) exclusively by Casella Organics. Casella Organics subcontracts individual haulers that must adhere to NYS DOT regulations and Casella Organic’s strict requirements and company policies. The SBS Facility’s Spill Control Plan is based on “Casella Organic’s Spill Control Plan for Casella Organic’s Subcontractors” which is attached hereto.

Casella’s Spill Control Plan shall be applicable to the biosolids that Casella Organic’s delivers as well as any Carbon Fertilizer™ that Casella Organics receives from the SBS Facility. Transported materials are limited to biosolids and Carbon Fertilizer™ only. Neither biosolids nor Carbon Fertilizer™ are hazardous materials, thus no HAZMAT response preparation is required.

In the event the SBS Facility utilizes other haulers to transport Carbon Fertilizer™ from the SBS Facility, the SBS Facility shall utilize the same training and reaction procedures outlined in Casella Organic’s Spill Control Plan. Notifications for any Carbon Fertilizer™ spills that occur shall be reported directly to the SBS Facility’s main phone line directly and subsequently reported by Casella to the NYS DEC, and by SBS to the Town of Moreau.

Responding to emergencies is a team effort that requires communication. In addition to Casella Organic’s personnel notifying the Generating Facility of the material spilled (Page 3. Section 8), the SBS Facility will also be notified in all cases of spills occurring off the SBS Facility’s premises of materials being transported to and from the SBS Facility by Casella Organics, or any subcontractor.

Any spills of biosolids or Carbon Fertilizer™ shall be reported on www.saratogabiochar.com to inform the community. Any spills of sulfuric acid, hydrated lime, or liquid nitrogen shall have specific spill control plans related to each material as required by permitting agencies. Any spills of sulfuric acid, hydrated lime, or liquid nitrogen shall also be reported on www.saratogabiochar.com.

The SBS Facility and Casella Organics mutually agree to adhere to the Spill Control Plan outlined in this document as well as the Casella Organic’s Spill Control Plan for Casella Organic’s Subcontractors attached hereto.

Responsible party:

Bryce Meeker, President
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SPILL CONTROL PLAN FOR CASELLA ORGANICS' SUBCONTRACTORS

PURPOSE: The purpose of this Spill Control Plan is to outline the procedures and training necessary to ensure adequate and efficient control, containment, and management of residual materials (e.g. biosolids, ash, short paper fiber, etc.) and equipment fluids (e.g. diesel fuel, oil, etc.) that may be accidentally released during loading, transport, and/or unloading of residuals being transported for Casella Organics.

TRAINING: All contracted transportation supervisors, drivers, and project managers involved in the transportation of residuals will receive initial training and annual refresher training in this Spill Control Plan. Training will cover all aspects of the Spill Control Plan as outlined below. **Subcontractors are responsible for providing and documenting this training and will provide to Casella Organics proof of training upon request.**

POLICY AND PROCEDURE: It is Casella Organics' policy that if an incident occurs that causes an unintentional release of residuals and/or equipment fluids during transportation, the procedures described below must be followed by its subcontractors.

RESIDUALS - SPILL CONTROL AND EMERGENCY RESPONSE

1. In the event of any accident or spill, first follow the written accident procedures, as applicable. The spill response must occur as soon as safely practical. The driver will determine the quantity of material released and decide whether simple shovel (SITUATION I) or material handling machinery, such as a front-end loader or backhoe, (SITUATION II) will be required to reload the material into a container. If, for example, the bulk transporter trailer tailgate is ajar causing a small quantity of material to be released, a shovel may be adequate to reload the product (SITUATION I). However, if the bulk transporter trailer is overturned, a front-end loader or similar equipment will be required to re-load the product into an empty replacement trailer (SITUATION II).
2. In all cases, the driver will immediately contact a supervisor or dispatcher about the spill and the circumstances of the incident and provide a telephone number or location where a return call may be made to provide further instructions or assistance in evaluating the specific action that should be taken. **Direct contact must be made. It is not acceptable to leave a voice message only.**
3. Immediately after making initial contact with a supervisor or dispatcher, the driver will follow the General Procedures for SITUATION I or SITUATION II as outlined below.

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4. The supervisor/dispatcher will immediately contact Casella Organics starting with the Primary Coordinator, and if that person is not available, the Secondary Coordinator, and down the list until direct contact is made. It is not acceptable to leave a voice message only.
5. The supervisor and Casella Organics will work in coordination to promptly call local emergency services (911) and notify them of the incident including the size, nature and location of the spill.

Casella Organics Primary Contacts:

<u>Logistics:</u>	Office	Cell	Home
Steve Perkins	(603) 290-5834	(603) 717-6790	
Rob Bowman (back up)	(207) 948-3071	(207) 249-8602	(207) 285-3878

Casella Organics Secondary Contacts:

<u>Compliance:</u>	Office	Cell	Home
Jeff McBurnie	(800) 933-6474	(207) 272-8395	
Mary Waring	(800) 933-6474	(207) 798-2064	(207) 725-5941

Division Managers:

<u>ME:</u>	Office	Cell	Home
John Leslie	(800) 287-9947	(207) 461-1000	(207) 825-8801

<u>NY, PA, VT, & DE:</u>	Office	Cell	Home
Jeff Brinck	(518) 383-0137	(518) 258-2763	

<u>NH, MA, CT, & RI:</u>	Office	Cell	Home
Mark Lyons	(603) 290-5824	(207) 303-2065	

<u>Director of Operations:</u>	Office	Cell	Home
Clark James	(207) 347-3606	(207) 205-0499	

6. The driver will provide local on-site emergency personnel including Local or State law enforcement officials and/or fire/rescue personnel with information about the material and other information as noted on the paperwork for that load (example: manifests).
7. The driver should be professional and polite in dealing with any reporters or media but should direct all inquiries to the Casella Organics contacts as noted in step 5 above. Keep in mind that there are no "off the record" comments in dealing with the media.
8. Casella Organics personnel will notify the Generating Facility in all cases of spills occurring off the Plant's premises.

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SITUATION I – DRIVER GENERAL PROCEDURES

- a. Prepare yourself with the necessary personal protective equipment.
- b. Unroll and spread a sheet of polyethylene (stowed in the tractor's storage compartment) on ground which is as level as possible next to the released product.
- c. Shovel the material onto the polyethylene sheet. Fold sheet around material and load it into the trailer.
- d. In case of rain or wind at the time of the occurrence, and if circumstances permit, use a polyethylene sheet to shield the product.
- e. When the rain and/or wind subside, complete steps (a), (b) and (c) above.
- f. Remove any soil that may have been in contact with the product and if space allows, place in trailer. If space in the trailer is not available, package in appropriate containers and make provisions for the filled containers to be properly handled and disposed.
- g. For those spills involving residuals which may contain pathogens (e.g. unstabilized biosolids*), paved surfaces should be treated with lime, a bleach/water solution, or other Casella Organics approved product after the spilled material has been removed.

SITUATION II – GENERAL PROCEDURES

- a. The agencies listed below will be notified by the Casella Organics' representative or the trucking supervisor as decided by Casella Organics, as appropriate for all accidents or incidents that involve transport vehicles that have been overturned or damaged to the extent that the load has been substantially released from the vehicle. The basic information regarding the incident will be reported to the specific jurisdictional agency in order that the agency may make its own independent evaluation of the situation. The agencies are as follows.

Notify Fire and Police
911

In Maine: Maine Dept. of Environmental Protection

1. (800) 482-0777, (207) 287-7688 - Augusta
2. (207) 624-7076 State police – Augusta RCC
3. (207) 624-4400 Maine Emergency Management Agency

In Massachusetts: Massachusetts Dept. of Environmental Protection.

1. (888) 304-1133 anywhere in the State
2. (508) 820-2259 State Police – Emergency Management Section

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In Connecticut: Connecticut Dept. of Energy & Environmental Protection

1. (860) 424-3338, (866)337-7745
2. (860) 685-8190 State Police
3. (860) 256-0800 Emergency Management

In Delaware: Delaware Dept. of Natural Resources & Environmental Control

1. (800) 662-8802 in-state, (302) 739-5072
2. (302) 739-5901 State Police
3. (877) 729-3362 Emergency Management Agency, in state

In New Hampshire: New Hampshire Dept. of Environmental Services

1. (603) 271-3899 M-F; (800) 346-4009
2. (603) 223-4381 evenings/weekends State Police

In New Jersey: New Jersey Dept. of Environmental Protection

1. (877) 927-6337 Bureau of Emergency Response
2. (609) 882-2000 State police

In New York: NYS Department of Environmental Conservation

1. (800) 457-7362 Statewide 24 hours
2. (800) 342-4357 State Police – Emergency
3. (518) 457-6811 State Police – Non-Emergency

In Pennsylvania: Pennsylvania Dept. of Environmental Protection

1. (800) 541-2050
2. (717) 783-5599 State Police – Non-Emergency

**In Rhode Island: Rhode Island Dept. of Environmental Management,
Office of Emergency Response**

1. (401) 222-1360 daytime
2. (401) 222-3070 24 hours
3. (401) 444-1000 State Police - HQ

**In Vermont: Vermont Agency of Natural Resources,
Dept. of Environmental Conservation**

1. (802) 828-1138 M-F 7:45 am -4:45 pm Waste Mgmt. Division
2. (800) 641-5005 24 Hour State Police Dispatch

In Canada: Environment Canada or Ministry of the Environment

1. (514) 283-2333, (866) 283-2333 Federal, Quebec
2. (416) 325-3000, (800) 268-6060 Ontario
3. (902) 426-6030, (800) 565-1633 New Brunswick
4. (866) 644-6826 Quebec Emergency Management Agency
5. (877) 314-3723 Ontario Emergency Management Agency
6. (800) 561-4034 New Brunswick Emergency Management Agency

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Should the incident occur in a jurisdiction not noted on this list, the Casella Organics representative or the trucking supervisor as decided by Casella Organics, will contact the State Police and the State Environmental Regulatory Authority that has jurisdiction to ensure that appropriate contact has been made.

- b. After the incident has been reported, the driver will secure the area to the extent practical (e.g. using safety triangles) to prevent passers-by from coming in contact with the spilled material. The driver will then unroll and spread a sheet of polyethylene (stowed in the tractor's storage compartment) over the entire quantity to prevent potential dissipation by wind or rain to the extent possible.
- c. If required, the transportation supervisor, in coordination with Casella Organics personnel and the appropriate regulatory and emergency response personnel, will contact and use an emergency spill response contractor such as Clean Harbors, Inc. or another suitable entity that can be on-site within two hours notification.
- d. Reloading of the spilled material will begin by folding the polyethylene sheet back far enough to expose a large enough portion of the product that will not hinder the loader's operation.
- e. Reloading of the spilled material will continue until no more may be reasonably recovered by the equipment. At this point, brooms and shovels should be used to reload the remaining portions of the product.
- f. Any soil that has been in contact with the product will be removed and, if space is available, loaded into the trailer. If space is not available in the trailer, the material will be placed in appropriate containers and provisions will be made to transport the filled containers to a suitable site as determined by the supervisor in coordination with Casella Organics management for proper handling and/or disposal.
- g. For those spills involving residuals which may contain pathogens (e.g. unstabilized biosolids*), paved surfaces should be treated with lime or a bleach/water solution, or other Casella Organics approved product after the spilled material has been removed.
- h. Some spilled materials may cause travel surfaces to become slippery. Treatment with sand and/or washing down the affected area may be advised.
- i. If the spill is on an unpaved area, excavate as much of the native material as necessary to remove biosolids and any potential leachate.
- j. Replace native materials with clean sand or loam as appropriate.

SAFETY PRECAUTIONS: Drivers should practice good personal industrial hygiene during the management and cleanup of any spill. Appropriate personal protective equipment, including protective clothing (e.g. uniform), safety glasses, and gloves should be used when handling any spilled residual.

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EQUIPMENT - SPILL CONTROL AND EMERGENCY RESPONSE

1. **In case of Small Spills & Leaks from Equipment** – For spills involving equipment fluids (e.g. diesel fuel, hydraulic fluid, etc.) for 10 gallons or less oil, or one gallon or less of fuel).
 - A. Shut down equipment.
 - B. Extinguish all smoking materials.
 - C. Put on appropriate personal protective equipment (gloves, safety glasses).
 - D. Identify the source of the leak or spill and shut off tank as quickly as possible.
 - E. Clean up the spilled material from around the equipment using spill kit.
 - F. Repair spill or leak source.
 - G. Notify the supervisor/dispatcher of spill or leak, **make direct contact**.
 - H. Remain in radio contact.
 - I. The supervisor/dispatcher will notify Casella Organics personnel in order of priority as outlined in the Residuals Spill Procedures.
 - J. Any spill reaching waters of the State or the land must be reported to the State regulatory agency within 2 hours of discovery.

2. **In case of Large Spills & Leaks from Equipment** – For spills involving equipment fluids (e.g. diesel fuel, hydraulic fluid, etc.) for greater than 10 gallons of oil or one-gallon fuel
 - A. Shut down equipment.
 - B. Extinguish all smoking materials.
 - C. Put on appropriate personal protective equipment (gloves, safety glasses).
 - D. Identify the source of the leak or spill and shut off tank as quickly as possible.
 - E. Dam up the material around the equipment & release areas using absorbent material, shovels, etc.
 - K. Notify your supervisor/dispatcher of the incident, **make direct contact**.
 - G. The supervisor/dispatcher will notify Casella Organics personnel in order of priority as outlined in the Residuals Spill Procedures.
 - H. The supervisor/dispatcher will coordinate with Casella Organics personnel to contact an appropriate contractor to assist with responding to the release.
 - I. The supervisor/dispatcher will coordinate with Casella Organics personnel to contact the Fire Department, and appropriate environmental regulatory agency(ies). Any spill reaching waters of the State or the land must be reported to the State regulatory agency within 2 hours of discovery.
 - J. Remain in radio contact.

SAFETY PRECAUTIONS: Drivers should practice good personal industrial hygiene during the management and cleanup of any spill. Appropriate personal protective equipment, including protective clothing (e.g. uniform), safety glasses, and gloves should be used when handling any spilled petroleum product.

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GENERAL ENVIRONMENTAL PRECAUTIONS

Rain and Waterway Considerations:

1. If heavy rain conditions exist, cover the released material with polyethylene sheeting and secure the edges to prevent the material from being washed away. Dike the potential run off area with earth and plastic sheeting to contain any material which could potentially be washed away.
2. If the material is in the proximity of a waterway, dike the area between the spilled product and the waterway with earth and plastic sheeting to secure that portion of the material next to the waterway before any other action is attempted.
3. If the material enters or may potentially enter into a waterway, dike or dam the material. Once the waterway has been protected, begin reloading the product.

Surface, Ground and Soil Consideration:

1. Some spilled materials may cause travel surfaces to become slippery. Treatment with sand and/or washing down the affected area may be advised.
2. During reloading, use sufficient polyethylene sheeting to protect the adjacent soil to the greatest extent possible.
3. Remove a sufficient quantity of surface soil to ensure that no product remains. This material may either be loaded into the transport trailer or other provisions for its transport and disposal will be made.

WRITTEN REPORTING: The transportation supervisor, with the assistance of the professional driver of the transport vehicle, in coordination with Casella Organics personnel will be responsible for completing a report that will:

- Document the incident including the location of the spill, the date and time of the spill, the weather conditions at the time of the spill, a description of how/why the spill occurred, the name of the driver and other individuals who were present, and actions taken to clean-up and remediate the site.
- Submit documentation as required to appropriate authorities and Casella Organics Management. This may include the State Environmental Regulatory Agency, State Police, and State Dept. of Transportation depending on whether the spill threatened to impact soil or water, occurred on a public roadway, and/or was the result of an accident.
- Prepare an action plan for completing site remediation and returning the spill site to its original condition or make the determination that no further action is required.

*Biosolids are the solid or semi-solid residue resulting from the treatment of wastewater. Biosolids contain nutrients such as nitrogen and phosphorus. In addition, unstabilized biosolids contain potential human pathogens and need to be handled with care to minimize potential impacts to human health and the environment.

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SPILL CONTROL CONTACTS

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STATE AGENCY AND ADDITIONAL EMERGENCY CONTACTS

Notify Fire and Police
911

In Maine: Maine Dept. of Environmental Protection

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5. (207) 624-7076 State police – Augusta RCC
6. (207) 624-4400 Maine Emergency Management Agency

In Massachusetts: Massachusetts Dept. of Environmental Protection.

3. (888) 304-1133 anywhere in the State
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In Delaware: Delaware Dept. of Natural Resources & Environmental Control

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5. (302) 739-5901 State Police
6. (877) 729-3362 Emergency Management Agency, in state

In New Hampshire: New Hampshire Dept. of Environmental Services

3. (603) 271-3899 M-F; (800) 346-4009
4. (603) 223-4381 evenings/weekends State Police

In New Jersey: New Jersey Dept. of Environmental Protection

3. (877) 927-6337 Bureau of Emergency Response
4. (609) 882-2000 State police

In New York: NYS Department of Environmental Conservation

4. (800) 457-7362 Statewide 24 hours
5. (800) 342-4357 State Police – Emergency
6. (518) 457-6811 State Police – Non-Emergency

In Pennsylvania: Pennsylvania Dept. of Environmental Protection

3. (800) 541-2050
4. (717) 783-5599 State Police – Non-Emergency

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6. (401) 444-1000 State Police - HQ

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9. (902) 426-6030, (800) 565-1633 New Brunswick
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