

**LANCASTER COUNTY  
SOLID WASTE MANAGEMENT AUTHORITY**

***TRANSPORTATION COMPLIANCE PLAN***

**August 2017**

# LCSWMA TRANSPORTATION COMPLIANCE PLAN

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# LCSWMA TRANSPORTATION COMPLIANCE PLAN

## A. BACKGROUND

In order to fulfill its part in achieving DEP's desire to improve waste transportation safety and compliance with waste hauling regulations, the Lancaster County Solid Waste Management Authority (LCSWMA) developed a **Transportation Compliance Plan** for use at its four waste processing or disposal facilities. These facilities are the Lancaster County Waste-to-Energy Facility, the Frey Farm Landfill, the Transfer Station, and the Susquehanna Resource Management Complex. The specifics of this plan are discussed below.

## B. TRANSPORTATION COMPLIANCE PLAN

### B.1 Transportation Compliance Manager

The Authority will designate the LCSWMA Safety Manager to serve as the Transportation Compliance Manager. This person will oversee and manage the various compliance activities required by the Authority's Transportation Compliance Plan, such that the Plan can achieve its objective, which is to improve waste transportation safety and compliance with waste hauling regulations when delivering waste to processing or disposal facilities within the state. The Transportation Compliance Manager will also be responsible for coordinating the semi-annual regulatory safety inspections discussed below in Section B.6. These inspections will be a cooperative effort between the Authority and representatives from PennDOT, the PSP, and police departments from the respective host municipalities.

### B.2 Facility Daily and Quarterly Environmental Compliance Checks

Applicable vehicles are all vehicles licensed by LCSWMA whose business is to provide waste collection and transportation services. These vehicles will be checked on a daily basis to ensure that they meet applicable regulatory requirements. Additionally, vehicles will be subject to more rigorous inspections at intervals deemed appropriate by LCSWMA at all Authority facilities.

#### B.2.1.A Weighmaster Compliance Checks/Overweight Vehicle Compliance

The initial compliance checks that waste transporters will be subject to will be done by the LCSWMA Facility Weighmaster. The Weighmaster will be monitoring transporters for two primary things: vehicle registration with PADEP WTSP and vehicle weight.

Vehicles that deliver waste to a LCSWMA facility to be processed must weigh in and unload their contents prior to exiting the site. A weight ticket containing pertinent load information is given to each driver before he/she leaves. If the load is overweight, it will be indicated on a copy of the weight ticket as **“OVERWEIGHT”**. Also, the Weighmaster fills out the **LCSWMA Overweight Record Form** (see Appendix A), entering information such as the date and time of delivery, gross weight of vehicle, generator and transporter name, phone number and address, transaction number, and license number and state.

At the end of each day in which an overweight load is weighed in, the Weighmaster sends a copy of the **LCSWMA Overweight Record Form** to the Transportation Compliance Manager for review. The Transportation Compliance Manager will enter the pertinent information into the transportation compliance database. This database, which is discussed in Section C, will be used to track transporter regulatory compliance. The **LCSWMA Overweight Record Forms** and the DEP-required **Daily Operational Record** will be kept on file at each LCSWMA facility and will be made available for DEP review upon request.

### **LCSWMA OVERWEIGHT VEHICLE PENALTIES**

- 1.) As required by Pennsylvania Code Title 25 273.31 LCSWMA will record weights and registration information on each vehicle arriving at LCSWMA Facilities that exceed 73,280 lbs. GVW and 80,000 GVW for combination vehicles.
- 2.) When a vehicle exceeds its GVW limit by between 500 lbs. and 2,000 lbs. the owner of the vehicle will be contacted regarding the weight violation (email or mail).
- 3.) Vehicles that exceed GVW by >2,000 lbs. to 3,500 lbs. will be required to incur a time penalty delay of 30 minutes.
- 4.) Vehicles that exceed GVW by >3,500 lbs. to 5,000 lbs. will be required to incur a time penalty delay of 45 minutes.
- 5.) Vehicles that exceed GVW by > 5,000 lbs. to 6,500 lbs. will be required to incur a time penalty delay of 1 hour.
- 6.) Vehicles that exceed GVW by > 6,500 lbs. will incur a time penalty of 75 minutes with LCSWMA reserving the right to suspend facility usage by the offending party.

#### **B.2.1.B Designated Haul Route Compliance**

The LCSWMA Safety Manager along with LCSWMA Facility Compliance Officers and Labor staff will conduct weekly visual observation of traffic on restricted roads within the Township for waste hauling traffic (Letort Rd., Blue Rock Rd. and Anchor Rd.) and complete an observation form (see attached) documenting the date and time the inspection was completed along with any offending vehicle information. Written notice of the infraction will be provided to the operator of the vehicle. A second offense by the same vehicle operator will result in a 30 minute

delay time penalty and forwarding of information to the Manor Township police. A third offense will result in a one week ban of the vehicle operator from the landfill. A fourth offense will result in a one year ban of the vehicle operator from the landfill.

### **B.2.1.C Haul Route Speed Compliance**

The LCSWMA Safety Manager along with LCSWMA Facility Compliance Officers and Labor staff will conduct weekly speed checks utilizing a LCSWMA owned radar gun. Staff will conduct speed checks for a minimum of 2 hours per day along designated waste hauling routes, this interval may be reduced if automated traffic monitoring systems are applied (driver in cab systems and or speed photo image recording monitoring systems). The date, time, and location of the speed checks will be documented (see attached form) along with the pertinent information for any violators (truck #, license # and driver name). Written notice of the speeding infraction will be provided to the vehicle owner. A second (2<sup>nd</sup>) infraction by the same vehicle operator will result in a thirty (30) minute delay time penalty. A third (3<sup>rd</sup>) infraction will result in a forty-five (45) minute delay time penalty. Any further infractions will result in a one (1) hour penalty and the option by LCSWMA to suspend the vehicle operator from LCSWMA Facilities.

### **B.2.2 Facility Compliance Officer Environmental Checks**

The second compliance check will be done by Authority compliance officers. These environmental checks will be done on a daily basis. Compliance officers at each LCSWMA facility will inspect delivery vehicles at random to ensure that: (1) they are not leaking; (2) they have the proper signage; and (3) they are tarped and adequately secured. The following specifies the DEP requirements for proper vehicle signage and load securement:

- The vehicle must have a clearly visible sign (or signs) in lettering at least **six inches in height**. The sign must include the following information:
  - Name and business address (city/state/zip) of the vehicle owner
  - Type of waste being transported (municipal or residual)
- The waste must be completely covered or enclosed during transportation and parking. If a tarp is used, it must be free of holes and securely fastened to prevent leakage, spillage, dusting, or littering during waste transport.

The compliance officers will note any discrepancies they observe, based on the above criteria, and relay this information, by radio, to the Weighmaster. The Weighmaster will enter these discrepancies on the ***LCSWMA Truck Log Sheet*** (Standard Operating Procedure OPS-0011 / SRMC-0012; see Appendix A). These

forms will also be kept on file at each LCSWMA facility and be available for review by DEP upon request.

- Vehicles not in compliance within one (1) week will be turned away until they comply with requirements.

### **B.3 Tracking Compliance Violations**

As discussed above, the Weighmaster will keep track of the transporter compliance violations he observes, as well as those radioed to him by the compliance officers, on the **LCSWMA Transporter Inspection Form**. This form will be sent to the Transportation Compliance Manager for review at the end of each day in which a violation is observed. The Transportation Compliance Manager will also be responsible for entering the relevant compliance information into the database and communicating infractions to the transporter.

### **B.4 Assessment of Compliance**

The transportation compliance database will be checked on a periodic basis to determine each transporter's record of compliance with the waste transportation regulations. At year end, the records for each Hauler in the database will be tabulated and a compliance rate calculated. This information will be forwarded to waste haulers for their internal review.

### **B.5 Periodic Program Review**

The Transportation Compliance Group will be responsible for reviewing the Plan annually or as needed throughout the year.

The following LCSWMA personnel will be on the Transportation Compliance Group: the Chief Operating Officer; the Safety Manager; and the Facility Directors from the Transfer Station, the Waste-to-Energy Facility, the Susquehanna Resource Management Complex, and the Frey Farm Landfill.

## **B.6 Regulatory Safety Inspections**

In order to further detect and correct safety violations, efforts will be made by LCSWMA to coordinate semi-annual regulatory safety inspections at all Authority facilities. These inspections will be coordinated with the Pennsylvania State Police, and the police department of the host municipality for the LCSWMA facility selected for the inspection.

The inspections that will be done at this time will include items discussed in Sections B.2.1 and B.2.2, and will also include additional checks to verify that the following items are in the vehicle:

- A fully-charged fire extinguisher with an Underwriter's Laboratories (UL) rating of 5 B:C or better, or two fully-charged fire extinguishers, each with a UL rating of 4 B:C or better.
- A municipal or residual waste transporter's daily operational record.
- For residual waste transporters, a copy of a contingency plan, as well as protective clothing, equipment, and first-aid supplies for use in emergencies.
- For transporters of liquid wastes, absorbent mats and/or materials to absorb liquids in the event of a spill or leak.

The Transportation Compliance Manager will coordinate the semi-annual safety inspections with the various regulatory and law enforcement agencies. The findings of the semi-annual safety inspections will be tracked using the transportation compliance database.

## C. TRANSPORTATION COMPLIANCE DATABASE

The transportation compliance database will be used to track and monitor transporter compliance with the waste transportation regulations. The database will contain information taken from the **LCSWMA Overweight Record Form** and from the **LCSWMA Transporter Inspection Form**. The Transportation Compliance Manager will be responsible for having this information entered into the database following periodic and semi-annual inspections.

The database contains the following information:

### ***Load information:***

LCSWMA Facility  
Truck Permit No. / Truck No.  
Box/Container No.  
Transaction No. / Date  
Transporter Name / Address / Phone / License Number / State  
Vehicle Weight  
Material Type / G-Code / H-Code

### ***Violation Type:***

Overweight Vehicle Violations  
Load Violation (leaking; not secured)  
Tarp Violation (no tarp; holes in tarp; tarp not securely fastened)  
Sign Violation (no sign on vehicle; lettering not 6"; no waste type on sign)  
Fire Extinguisher Violation (no extinguisher; extinguisher not charged)  
No Transporter's Daily Operational Record  
No Contingency Plan / Spill Kit (for residual waste transporters only)  
No copy of a Residual Waste Transportation PPC Plan  
Speeding Violations  
Designated Haul Route Violations



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- ***Facility Haul Route Speed Limit/Safety Zone Map***
- ***Driver Packet Designated / Restricted Haul Routes Map Manor Township***







**MONITORING AND REPORTING; PADEP  
TRANSPORTATION COMPLIANCE PLAN**

Approval:	Chief Operating Officer _____	Original Issue Date:	January 1, 2007 _____	No.	OPS-0011 / SRMC-0012 _____
Owner:	Safety Manager _____	Revision Date:	May 3, 2011 _____	Page:	2 of 2

**TRUCK LOG SHEET**

**A. GENERAL INFORMATION:**

Transaction Number: \_\_\_\_\_ Date: \_\_\_\_\_

Generator Name and G-Code: \_\_\_\_\_ LCSWMA Facility: \_\_\_\_\_

**B. TRANSPORTER INFORMATION:**

LCSWMA License Number: \_\_\_\_\_

1. Truck Number: \_\_\_\_\_

2. Container/Trailer Number: \_\_\_\_\_

Transporter Company Name: \_\_\_\_\_

**C. VIOLATIONS:**

1. Overweight: \_\_\_\_\_ 8. Sign lettering not 6 in. high: \_\_\_\_\_

2. Leaking load: \_\_\_\_\_ 9. No sign designating waste: \_\_\_\_\_

3. Unsecured load: \_\_\_\_\_ 10. No fire extinguisher: \_\_\_\_\_

4. No tarp: \_\_\_\_\_ 11. Discharged fire extinguisher: \_\_\_\_\_

5. Holes in tarp: \_\_\_\_\_ 12. No Contingency Plan: \_\_\_\_\_

6. No sign: \_\_\_\_\_ 13. No Safety Chains: \_\_\_\_\_

7. Tarp not securely fastened: \_\_\_\_\_ 14. Charge: YES  NO

Comments: \_\_\_\_\_  
\_\_\_\_\_

Observer's Signature: \_\_\_\_\_

Description of Revision(s):	12/8/08- added C.14. to Truck Log Sheet; 8/24/10 – rev. job titles; 5/3/11 - added
Generator name;	_____



**Covanta Lancaster, Inc.**  
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1911 River Road  
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October 23, 2006

To: Gary Forster/Bill Trovinger  
From: Jim Klecko  
Subject: Covanta Safety Procedure #32

Attached is a slightly revised copy of Covanta's Safety Procedure #32. Please review and incorporate into LCSWMA's safety program.

Cc: File

*Thank  
JK*

LANCASTER

(A Covanta Energy Facility)

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Issued by: John M. Klett  
John Klett, SVP, Operations

August 1, 2006  
Date

Acknowledged by: J. Chlebo  
Facility Manager

10/23/06  
Date

Revision Date: August 1, 2006  
Revision No. 7

**1.0 Purpose**

- 1.1 To notify personnel on the tipping floor about the hazards, such as slipping and tripping conditions, sharps/penetrating objects, falling objects in the pit area, airborne particulate, dust and fumes, fire potential, hazardous materials, noise, and moving vehicles/traffic, so they can work in a safe and efficient manner.
- 1.2 To protect the physical plant and equipment from damage resulting from accidents on the tipping floor.
- 1.3 To standardize procedures and personal protective equipment requirements for working on the tipping floor.
- 1.4 To ensure that the tipping floor operators are made aware of all pedestrian traffic and work that is performed on the floor
- 1.5 To ensure the safe removal of unacceptable/hazardous waste found in the delivered waste.
- 1.6 To ensure that all practices are in compliance with all applicable regulations:
  - 1.6.1 Code of Federal Regulations (CFR), including:
    - 1.3.1.1 29 CFR 1910.23, Guardrails and Toe boards;
    - 1.3.1.2. 29 CFR 1910.28, Harnesses/Lifelines;
    - 1.3.1.3. 29 CFR 1910.178, Powered Industrial Trucks;
    - 1.3.1.4. 29 CFR 1926.602, Material Handling Equipment; and
    - 1.3.1.5. General Duty Clause, Section 5(a)(1) of the OSHA Act.
  - 1.6.2 Any state/local regulations.

**2.0 Scope**

- 2.1 This Procedure applies to the area defined by the tipping floor building enclosure at all Covanta facilities including the pit.
- 2.2 This Procedure applies to all CE employees.
- 2.3 This Procedure also applies to all non-CE employees and visitors present on the tipping floor, temporary laborers, tipping floor inspectors (who are often non-CE employees), janitorial staff, contractors, tour groups and all other non-CE employees. *Appendix A* is a Fact Sheet intended for haulers (drivers and their assistants).

**3.0 Responsibilities**

- 3.1 Refer to CE S.P. No. 1A, Responsibilities Document for responsibilities related to CE employees.
- 3.2 This Procedure requires that all employers of personnel with job responsibilities on CE tipping floors (including employers of haulers, temporary laborers, non-CE tipping floor inspectors, visitors, janitorial staff, contractors and all other non-CE personnel) are responsible for notifying and instructing their employees to recognize and avoid tipping floor hazards, so as not to expose their employees to these hazards.



- 3.2.1 This notification shall be repeated by the employer at the frequency necessary to control, and correct when necessary, their employees' compliance with their instructions.
- 3.2.2 Employers shall also ensure that their employees neither create tipping floor hazards nor expose CE employees to hazards as a result of their conduct.
- 3.2.3 The content of S.P. No. 32 provides CE's minimum requirements, to which employers should add their additional requirements. Employers shall be responsible and shall have the authority to ensure their employees' conduct on CE tipping floors is in compliance with these Procedures as well as the procedures of the employer.
- 3.2.4 Whenever CE management is notified of non-CE employee infractions of this Procedure, they will notify the responsible employer using the documentation contained in Appendix B.

#### 4.0 Personal Protective Equipment

- 4.1 Personal protective equipment required at all times for CE employees shall include:
  - 4.1.1 Hard hat;
  - 4.1.2 Safety glasses;
  - 4.1.3 Acceptable sturdy work boots in good condition. Canvas shoes, sneakers and sandals, or shoes with badly worn or thin soles are not acceptable;
  - 4.1.4 Hearing protection, per Safety Procedure No. 12;
  - 4.1.5 Long sleeved shirts and long pants serve as a barrier for an accidental spray of liquids and for hot surfaces.
  - 4.1.6 Reflective vests or clothing with reflective material sewn in or "bright" fluorescent shirts (i.e orange, green or yellow) must be worn by all CE employees while on the tipping floor. The "bright" fluorescent sections on the uniform shirt/jacket must be visible from 360°. Employee vests, if worn for this purpose, shall be of Class 2 to ensure 360° of reflective coverage.
  - 4.1.7 Work gloves must be worn when handling waste material.
  - 4.1.8 Harness and lifeline when working outside a tipping floor vehicle within 6 feet of curb in front of the edge of the pit; and
- 4.2 Half face respirators equipped with a minimum of an N95 Particulate Filters shall be made available to employees upon request or as needed.
- 4.3 Covanta requires that non-CE (contract) employees also wear the personal protective equipment listed in 4.1.1 - 4.1.5 above. Additionally, non-CE employees must always use a harness and lifeline when working outside a tipping floor vehicle within 6 feet of the curb in front of the edge of the pit.
- 4.4 It is highly suggested that haulers follow the same requirements listed above with a minimum of hard-soled shoes, long pants and shirts.

#### 5.0 Communication – Floor Access

- 5.1 Communication between all personnel entering the floor is of the utmost importance. Anyone wanting to enter the floor must obtain permission from the floor attendant/loader operator.

- 5.1.1 Before entering the tipping floor, you must wear a reflective safety vest (or equivalent) and in some cases a strobe light.
- 5.1.2 Anyone who will be on the floor for an extended period of time will need to have a radio or be with someone who does.
- 5.1.3 Contractors or maintenance working on the tipping floor must have clearance from the shift Supervisor and must set up barricades to establish a safe zone for working within.
  - 5.1.3.1 The loader operator will be notified of the type and location of work to be performed before starting the work.
  - 5.1.3.2 The area where the work will be performed will be isolated with safety tape, barrels, or other equivalent high visibility markers.
- 5.1.4 When escorting visitors onto the tipping floor, the CE escort is to notify the loader operator of the size, location and intentions of the group.
- 5.1.5 Housekeepers must not be allowed to walk across the floor to empty their carts. They should contact a loader operator for them to dump into the loader bucket. This can be performed (in most cases) just inside the entrance door away from traffic.
- 5.1.6 The front-end loader operator shall not operate within 10-feet of any delivery vehicle.
- 5.1.7 Loaders shall be equipped with working back-up alarms capable of being heard during high traffic/noise periods.

#### 6.0 Visual and Physical Guidelines

- 6.1 Anyone moving closer than 6 feet from the curb shall be required to wear a harness and lifeline secured to a suitable anchor and shall be required to communicate the plan for this movement in advance to the appropriate CE employee (such as the mobile equipment operator, crane operator, or shift supervisor) to ensure the necessary PPE is available and also to ensure that the 6-foot leading area zone is free of congestion.
- 6.2 Each facility must put a system in place to ensure that the drivers are aware of their proximity to the pit. These may include: Painting lines on the walls (16-foot vertical red line and diagonal stripes 6 feet from the curb and a yellow line painted 10 feet from the curb), installing a wind chime system or by placing physical boundaries (55 gallon drums, PVC barrels or other suitable demarcation painted bright orange) on the floor.

Anyone moving in front of these barrels or other demarcation closer than 6 feet from the curb shall be required to wear a harness and lifeline secured to a suitable anchor (see above).

- 6.3 Each facility must also have the necessary equipment available to perform emergency rescues in case someone was to fall into the pit.
  - 6.3.1 The rescue equipment must be stored in a way that it is easily accessible and available at all times.
  - 6.3.2 The equipment must be inspected on a routine basis.
  - 6.3.3 The employees performing the rescue must be trained and familiar with the equipment to be used.

#### 7.0 Tipping Floor General Integrity

- 7.1 Lighting on the tipping floor shall be adequate and maintained for all activities.
- 7.2 Pictorial and bilingual signs shall be used where appropriate.

- 5.1.1 Before entering the tipping floor, you must wear a reflective safety vest (or equivalent) and in some cases a strobe light.
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  - 6.3.2 The equipment must be inspected on a routine basis.
  - 6.3.3 The employees performing the rescue must be trained and familiar with the equipment to be used.

**7.0 Tipping Floor General Integrity**

- 7.1 Lighting on the tipping floor shall be adequate and maintained for all activities.
- 7.2 Pictorial and bilingual signs shall be used where appropriate.

- 7.3 The tipping floor surface shall be maintained as necessary to minimize slippery conditions on the floor.
- 7.4 The tipping floor shall be inspected daily.

**8.0 Tipping Floor Procedures**

- 8.1 A fact sheet of hauler rules is provided in *Appendix A*.
- 8.2 All personnel on the tipping floor shall be particularly alert to the potential hazards and shall exercise caution and good judgment. No one shall be permitted to make unauthorized movements around the tipping floor.
- 8.3 All trucks, loaders and forklifts are required to have their headlights on when they are on the floor.
- 8.4 Vehicles shall not be left unattended.
- 8.5 The crane operator shall not move the grapple in the bay while vehicles are discharging.
- 8.6 Daily inspections must be conducted on mobile equipment and logged noting any deficiencies. Repairs must be immediately made to any safety-related deficiencies (back-up alarms in particular). Mobile equipment must be removed from service until repairs are completed.
- 8.7 No one shall walk within six feet of the curb in front of the refuse storage pit. A harness and lifeline shall be worn for work that must be performed within the 6 foot boundary (e.g., to perform repair work on curbs). See *Section 5*.
- 8.8 Sweeping closer than 6 feet shall be done from inside a mechanical sweeper.
- 8.9 Spillage on the floor shall be pushed into the pit by the front end loader operator as soon as practicable.
- 8.10 Hand sweeping that must be performed shall be done using a long handled broom from outside the 6 foot boundary.
- 8.11 No employee is to stand behind the vehicle to attempt to loosen the load. This applies to frozen loads and anytime (e.g., vehicles opening from the back, such as rear packer vehicles).
- 8.12 Employees shall not allow trucks to exit the tipping floor until the tailgate has been closed and latched.
- 8.13 When required, the facility tipping floor inspector (who is often not a CE employee) will direct haulers to discharge directly onto the tipping floor, ensuring that they do not exit the vehicle unless 6 feet or more from the curb along the open pit and always staying within close proximity of the perimeter of their vehicle.
- 8.14 Facility management shall initiate notification of infraction proceedings upon observance or a report of infractions of these Procedures.
- 8.15 Likewise, CE employees on the tipping floor who observe non-compliance with these Procedures should notify their supervisor.
- 8.16 These Procedures shall also be periodically reinforced with client representatives who should in turn, provide these Procedures to haulers with whom they contract.

**9.0 Materials in the Waste Stream**

9.1 Acceptable Waste

9.1.1 Acceptable waste is defined by state regulations and the facility's operating permit.

9.2 Hazardous Waste

9.2.1 When a hazardous material is suspected in the waste stream, the facility management should be alerted immediately. Refer to *Safety Procedure No. 32A, "Identifying and Handling Hazardous Substances in the Waste Stream"*.

9.3 Medical and/or Secured Waste

9.3.1 Facilities that accept medical waste and/or secured waste shall handle the material according to the facility medical waste/secured waste operating procedures.

9.3.2 Facilities that do not accept medical waste and/or secured waste and suspect that such material is in the waste stream shall alert the facility management immediately and shall refer to *Safety Procedure No. 32A, "Identifying and Handling Hazardous Substances in the Waste Stream"*.

9.4 Radioactive Waste Detection/Response

9.4.1 Radioactive waste is not acceptable.

9.4.2 Each facility will have a response plan in place for unacceptable waste found on site.

**10.0 Training**

10.1 All CE employees shall be trained on this Procedure. Retraining shall be performed as required.

10.2 Ensure OSHA 29 CFR 1910.178 training requirements are met by all mobile equipment operators.

10.3 Review requirements for access/control of tipping floor.

10.4 Review actions to be taken in case of a fire on the floor or in the refuse pit.

10.5 Review actions to be taken in case of medical emergencies on the tipping floor.

10.6 Review railcar unloading procedures – if applicable.

10.7 Discuss maintenance requirements for tipping floor mobile equipment (including back-up alarms).

10.8 Review *Safety Procedure No. 24 "Fall Protection Systems"*. Address wearing of harnesses and lifelines when working around falling hazards (including the tipping floor pit falling hazard) and the requirements for their proper use. Discuss the means to be used to tie off personnel who must perform work closer than 6 feet from the curb along the edge of the pit.

10.9 Discuss the use of long-handled brooms when manual sweeping must be performed to ensure that employees do not cross the 6 foot boundary.

- 10.10 Train employees to notify either the Shift Supervisor or Facility Manager when infractions of *S.P. No. 32* are observed. Written notification of the infraction should be recorded and directed to the employer responsible for correcting the infraction. The form in *Appendix B* should be used for this purpose.
- 10.11 Review the facility tipping floor procedures for handling of medical and secured wastes if applicable.
- 10.12 Provide this Procedure to employers whose employees work on CE tipping floors so they can inform their employees of these Procedures. Periodically distribute *Appendix A* at the end of this Procedure to all haulers.

Covanta Energy, Inc.

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Safety Procedure No. 32  
Tipping Floor Safety Procedure

Letter To Haulers (Driver and Their Assistants)  
Regarding Tipping Floor Safety, S.P. No. 32

*Company Division or Department Name*  
*A Covanta Energy Company*  
*Street Address*  
*City, State, Zip --or-- City, Country, Postal Code*  
*Telephone #: Phone*  
*Facsimile #: Fax*

**DATE:**

**TO:** (All Haulers (Drivers and Their Assistants))

**FROM:** (Facility Manager/Business Manager)

**RE:** Tipping Floor Safety

As waste management professionals, you know better than anyone that the tipping floor of a waste-to-energy facility is a busy and challenging place to work. That is why we have procedures in place to help reduce or eliminate hazards to the greatest extent possible - for your safety as well as the safety of everyone involved on our tipping floors.

The following Fact Sheet is being issued as a reminder of how important those safety procedures are for you and everyone working at the facility. Please read them. Remember: safety is everyone's business.

attachment



**HEALTH AND SAFETY FACT SHEET**

**Tipping Floor Safety Procedures for Haulers (Drivers and Their Assistants)**

**Please Follow These Requirements for Everyone's Safety!**

1. Watch for tipping floor hazards. Exercise caution and good judgement.
2. Do not possess, consume or be under the influence of drugs or alcohol. Do not smoke.
3. Do not urinate on CE tipping floors or facility grounds.
4. Do not ride on the back of a vehicle or walk along a vehicle when the vehicle is moving. Do not ride or be near the rear of a vehicle when the truck is dumping its load.
5. Follow directions given by the facility employees (such as which tipping bay to use when dumping your load). Also follow all procedures required by your employer.
6. Observe posted speed limits. Stop at all stop signs. Follow flow of traffic signs. Drivers are obligated to remove disabled trucks from the facility. CE reserves the right to tow a disabled vehicle from the main traffic flow.
7. Do not leave your vehicle unattended. Do not bump vehicles or roll into or over the pit curbs. Also, verify that the crane grapple is clear of the area in front of the tipping bay before backing into the bay to dump your load.
8. Secure containers so leaking or spilling won't happen.
9. Do not walk within six feet of the pit.
10. When traveling with an assistant, only one of you should exit from the vehicle at a time. When out of the vehicle, stay within close proximity of your truck at all times.
11. If you have to release your tailgate or equipment, stop so the back of the truck is 10 feet from the edge of the pit. After stopping no less than 10 feet, get out to release your gate or equipment, then reenter the vehicle - don't stand behind the back of an opened tailgate. Back the vehicle up to the pit. After dumping, drive forward so the back of the truck is lined up with the 10-foot line. Get out of the truck to re-latch it. Get back into the truck. Drive the truck away from the tipping bay location. Your assistant should be with the truck at all times.
12. Don't jog the vehicle back and forth to jar the load loose when the truck is packed too tightly. Don't stand behind the vehicle to attempt to loosen the load.
13. CE employees are not permitted to help you release or free-up your load.
14. You may be asked to dump directly onto the tipping floor by the facility inspector. If so, be sure not to exit the vehicle unless 6 feet or more from the curb along the open pit. Always stay within close proximity of your truck.
15. Facility management will notify your employer if you do not follow these Procedures.
16. Covanta employees are required to wear a hard hat, safety glasses, acceptable sturdy footwear in good condition (canvas shoes, sneakers and sandals, or shoes with badly worn or thin soles are not acceptable), hearing protection, and a reflective vest or equivalently bright uniform. For your safety, Covanta recommends you also wear this personal protective equipment. Additionally, you must always use a harness and lifeline when working outside a tipping floor vehicle within 6 feet of the curb in front of the edge of the pit.
17. No one shall ever crawl underneath a truck and/or trailer or inside the hydraulic ram compartment on packer trucks, while on the tipping floor.
18. If your truck has developed an operational malfunction and is unable to perform the unloading function, unless authorized by the Facility Manager or his designee, no attempts should be made to make repairs on the tipping floor. The Covanta Equipment Operator or Tipping Floor Attendant should be notified who will contact the Facility Manager/designee.



Notification of Tipping Floor Procedure Infractions

To: \_\_\_\_\_  
*Responsible Employer* *Address*

From: \_\_\_\_\_  
*(CE)* *Date*

Non-compliance of Covanta S.P. No. 32, Tipping Floor Procedures, and/or federal, state or local regulations has been called to our attention. As a condition of the contract agreements and associated regulations, you are required to maintain a safe work environment and to prevent unsafe actions of employees.

**This Is A Violation Of:**

- Health/safety policies
- Contract policies/procedures
- Federal requirements
- State requirements
- Local requirements
- Other \_\_\_\_\_

**Describe the violation(s) in detail (attach additional pages, if needed):** \_\_\_\_\_  
\_\_\_\_\_

**Describe the corrective action to be taken:**

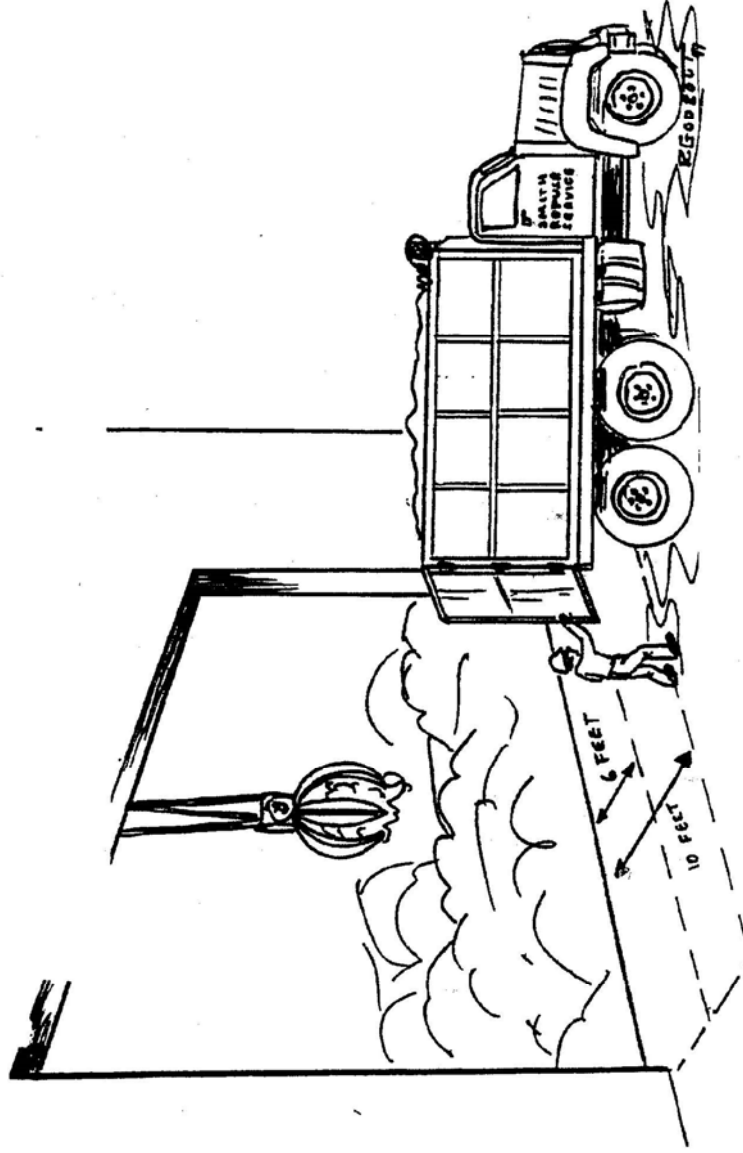
- Cease operations (s) until corrected
- Initiate and complete corrective action by \_\_\_\_\_
- Warn/instruct employees
- Take appropriate disciplinary action
- Change procedures/work methods
- Other \_\_\_\_\_

**Complete the following and return to the Shift Supervisor:**

Action Taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
*Signature/Position* *Date*

**COMPLY WITH COVANTA SAFETY PROCEDURE NO. 32!**



**MINIMIZE YOUR FALLING HAZARD -**

**STAY BACK FROM THE PIT AT LEAST SIX FEET**

## **LCSWMA Driver Packet**

### **Speeding**

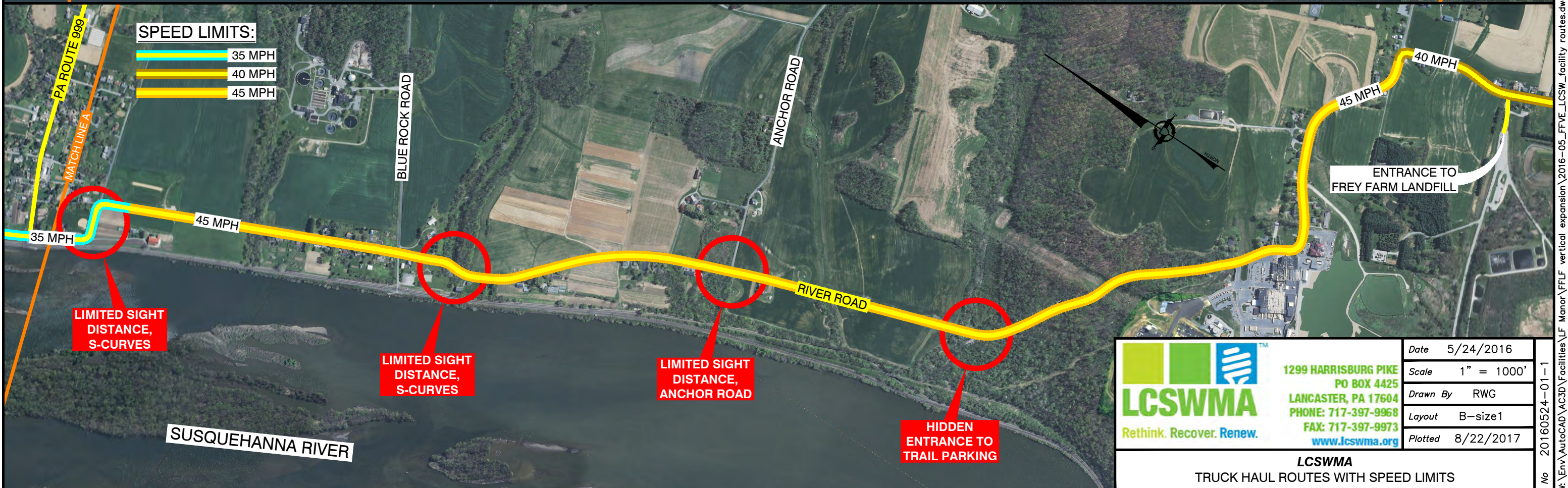
1. First speeding infraction along haul routes written notice of any provided to the owner and operator of the vehicle.
2. Second speeding offense by the same vehicle operator will result in a thirty (30) minute delay time penalty, and forwarding of information to the Manor Township police.
3. Third speeding offense will result in a one (1) week ban of the vehicle operator from the landfill.
4. Fourth speeding offense will result in a one (1) year ban of the vehicle operator from the landfill.

### **Violation of haul routes**

1. First designated haul route violation notification will be provided to the vehicle owner.
2. Second designated haul route violation by the same vehicle operator will result in a thirty (30) minute delay time penalty and forwarding of information to the Manor Township Police.
3. Third designated haul route violation will result in a one (1) week ban of the vehicle operator from the landfill.
4. A fourth designated haul route violation offense will result in a one (1) year ban of the vehicle operator from the landfill.

**TRANSFER STATION**  
**TIPPING FLOOR SAFETY and OPERATING RULES**

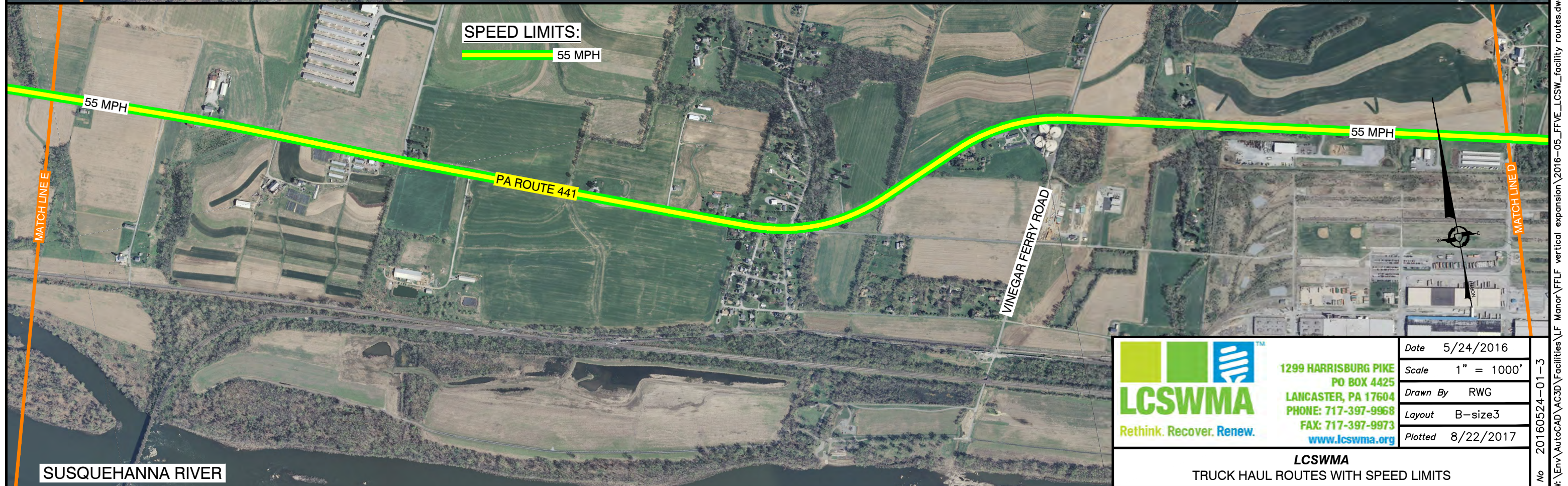
1. Drivers must maintain 14 ft. of space between unloading vehicles.
2. All Waste Hauler employees must wear a fluorescent colored garment (shirt, vest, or jacket) when on the Tipping Floor.
3. Driver / Helper: DO NOT cross beyond the yellow line marked on the side walls.
4. Driver / Helper: Stay within 6 ft. of your vehicle at all times.
5. Be aware of heavy equipment and truck traffic at all times.
6. Driver: Please unload and exit the tipping floor as quickly as possible.
7. Smoking is prohibited on LCSWMA property.
8. No scavenging of material on the Tipping Floor.
9. Children and pets must remain in vehicles at all times.
10. Fluorescent colored clothing is required at ALL times on the Tipping Floor.



 <b>LCSWMA</b> Rethink. Recover. Renew. <a href="http://www.lcswma.org">www.lcswma.org</a>	1299 HARRISBURG PIKE PO BOX 4425 LANCASTER, PA 17604 PHONE: 717-397-9968 FAX: 717-397-9973 <a href="http://www.lcswma.org">www.lcswma.org</a>	Date 5/24/2016 Scale 1" = 1000' Drawn By RWG Layout B-size1 Plotted 8/22/2017
	<b>LCSWMA</b> TRUCK HAUL ROUTES WITH SPEED LIMITS	
	No 20160524-01-1	
	w: \Env\AutocAD\AC3D\Facilities\LF Manor\FFLF vertical expansion\2016-05_FFVE_LCSW_facility_routes.dwg	



 <b>LCSWMA</b> Rethink. Recover. Renew. <a href="http://www.lcswma.org">www.lcswma.org</a>	1299 HARRISBURG PIKE PO BOX 4425 LANCASTER, PA 17604 PHONE: 717-397-9968 FAX: 717-397-9973 <a href="http://www.lcswma.org">www.lcswma.org</a>	Date 5/24/2016 Scale 1" = 1000' Drawn By RWG Layout B-size2 Plotted 8/22/2017
	<b>LCSWMA</b> TRUCK HAUL ROUTES WITH SPEED LIMITS	



**LCSWMA**  
Rethink. Recover. Renew.

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PHONE: 717-397-9968  
FAX: 717-397-9973  
[www.lcswma.org](http://www.lcswma.org)

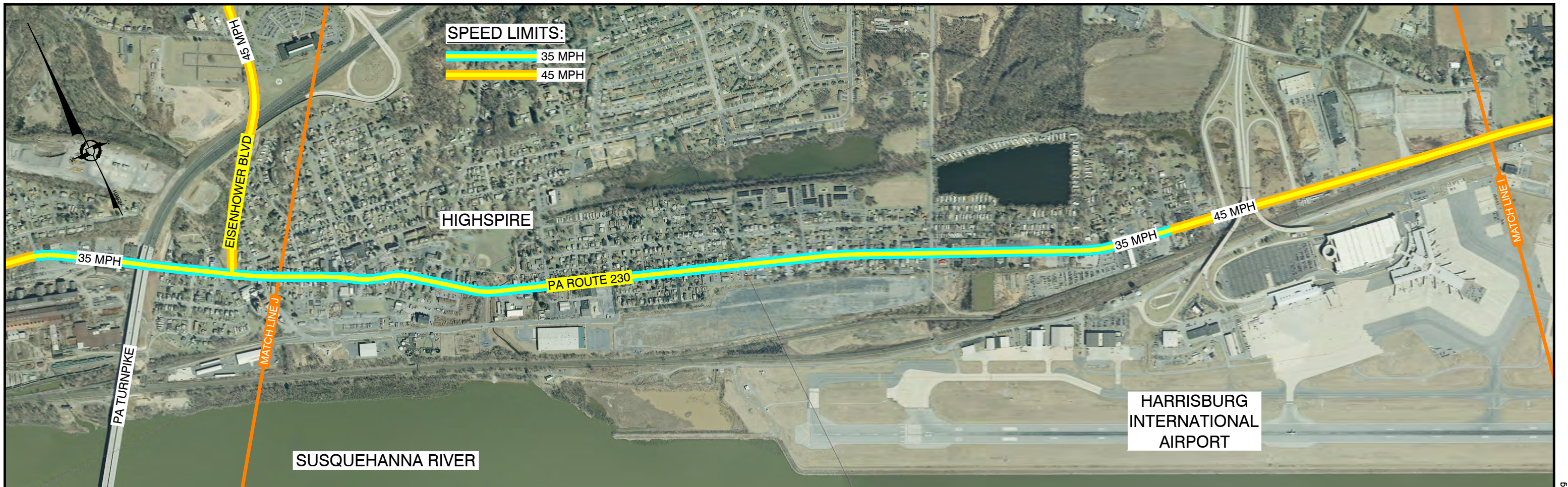
Date	5/24/2016
Scale	1" = 1000'
Drawn By	RWG
Layout	B-size3
Plotted	8/22/2017

**LCSWMA**  
TRUCK HAUL ROUTES WITH SPEED LIMITS



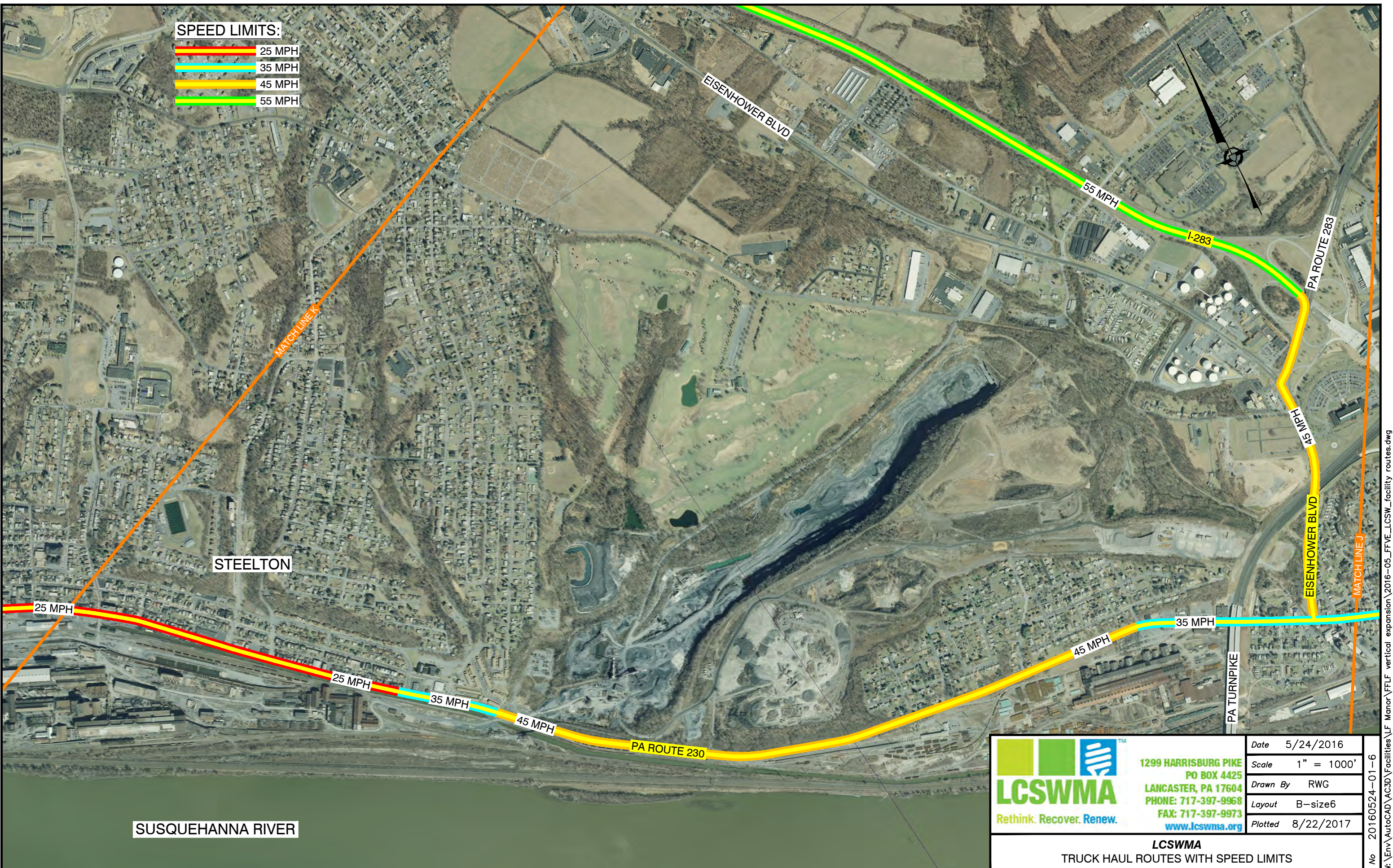
 <b>LCSWMA</b> Rethink. Recover. Renew.	1299 HARRISBURG PIKE PO BOX 4425 LANCASTER, PA 17604 PHONE: 717-397-9968 FAX: 717-397-9973 <a href="http://www.lcswma.org">www.lcswma.org</a>	Date 5/24/2016 Scale 1" = 1000' Drawn By RWG Layout B-size4 Plotted 8/22/2017
	<b>LCSWMA</b> TRUCK HAUL ROUTES WITH SPEED LIMITS	
	No 20160524-01-4	
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	LF Manor\FLL vertical expansion\2016-05_FFVE_LCSW_facility_routes.dwg	





 <b>LCSWMA</b> Rethink. Recover. Renew. <a href="http://www.lcswma.org">www.lcswma.org</a>	1299 HARRISBURG PIKE PO BOX 4425 LANCASTER, PA 17604 PHONE: 717-397-9968 FAX: 717-397-9973 <a href="http://www.lcswma.org">www.lcswma.org</a>	Date 5/24/2016 Scale 1" = 1000' Drawn By RWG Layout B-size5 Plotted 8/22/2017
	<b>LCSWMA</b> TRUCK HAUL ROUTES WITH SPEED LIMITS	

- SPEED LIMITS:**
- █ 25 MPH
  - █ 35 MPH
  - █ 45 MPH
  - █ 55 MPH

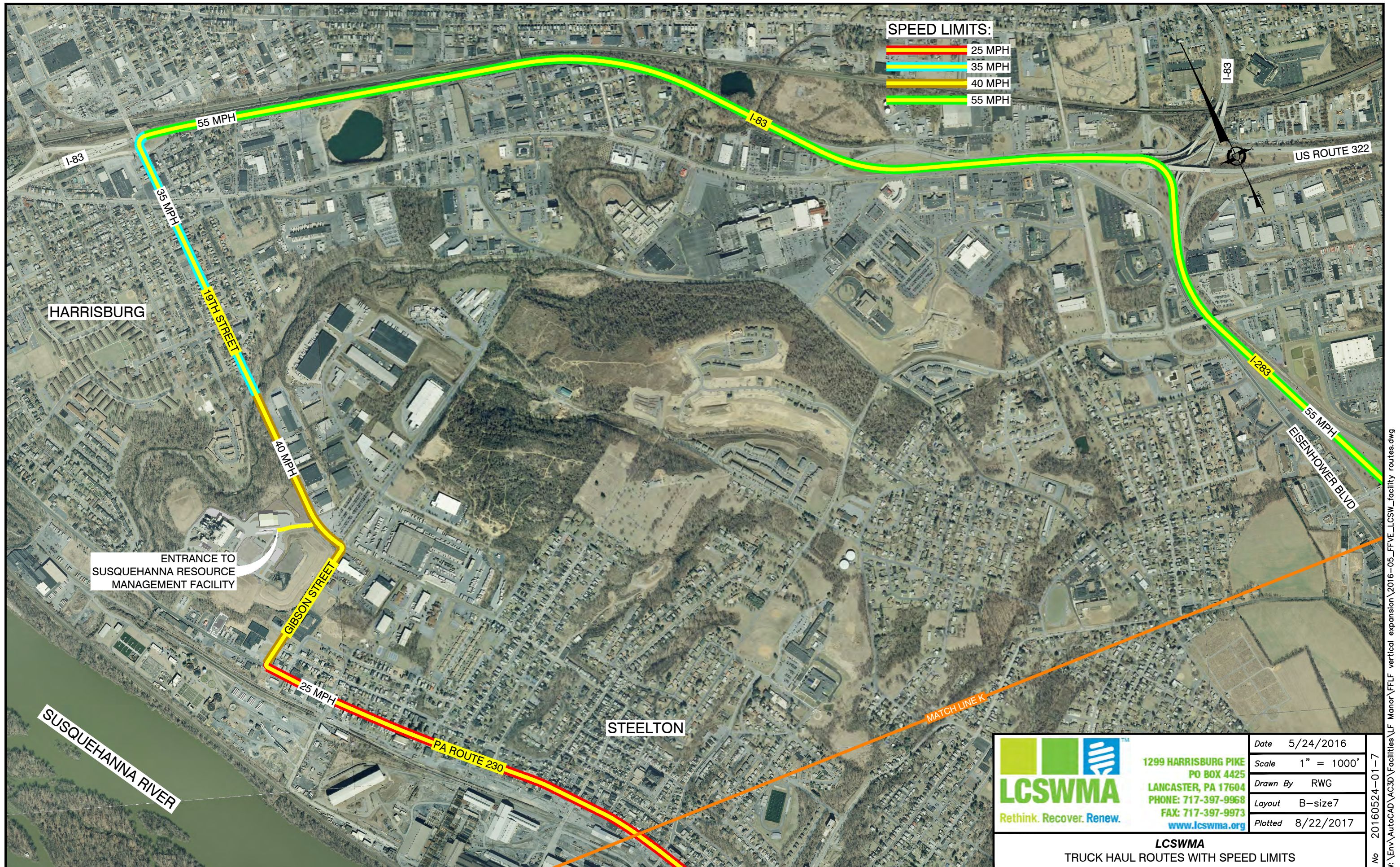


SUSQUEHANNA RIVER

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 LANCASTER, PA 17604  
 PHONE: 717-397-9968  
 FAX: 717-397-9973  
[www.lcswma.org](http://www.lcswma.org)

Date	5/24/2016
Scale	1" = 1000'
Drawn By	RWG
Layout	B-size6
Plotted	8/22/2017

**LCSWMA**  
 TRUCK HAUL ROUTES WITH SPEED LIMITS



**SPEED LIMITS:**

- 25 MPH
- 35 MPH
- 40 MPH
- 55 MPH

HARRISBURG

STEELTON

ENTRANCE TO  
SUSQUEHANNA RESOURCE  
MANAGEMENT FACILITY

SUSQUEHANNA RIVER

MATCH LINE K

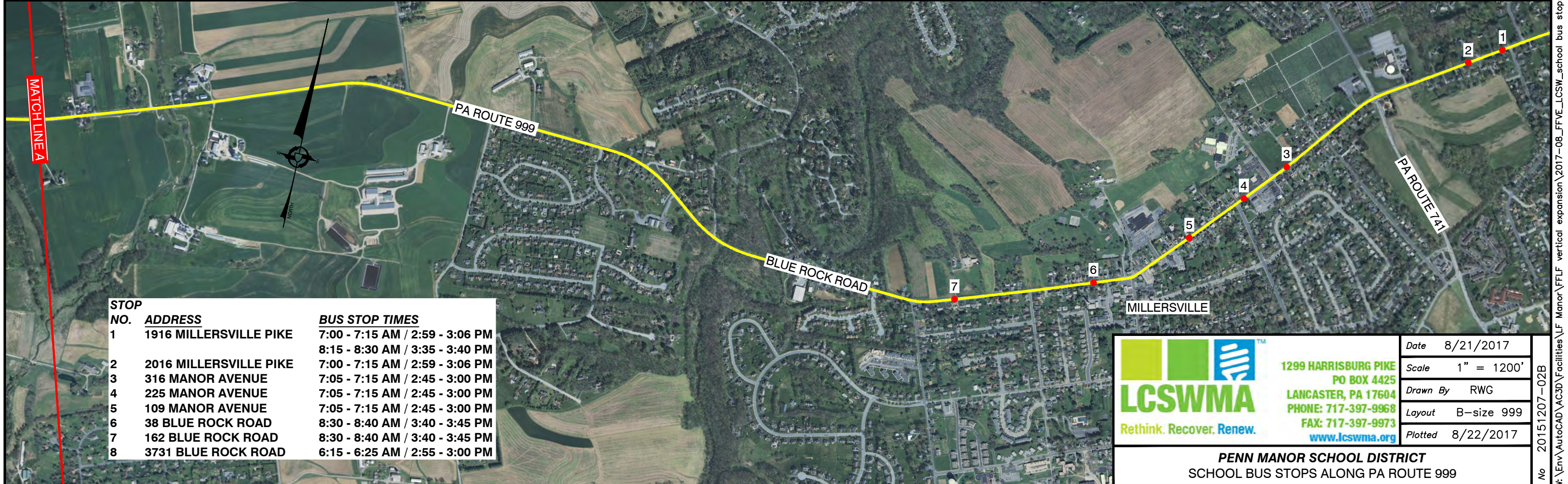


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Date	5/24/2016
Scale	1" = 1000'
Drawn By	RWG
Layout	B-size7
Plotted	8/22/2017

**LCSWMA**  
TRUCK HAUL ROUTES WITH SPEED LIMITS

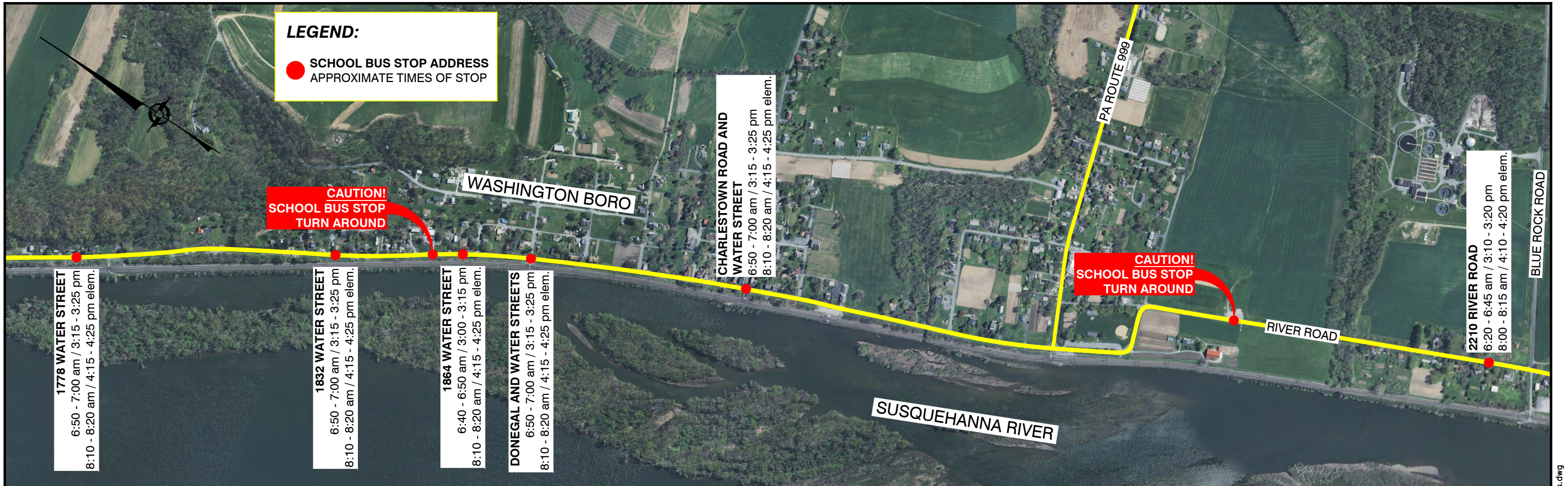


STOP NO.	ADDRESS	BUS STOP TIMES
1	1916 MILLERSVILLE PIKE	7:00 - 7:15 AM / 2:59 - 3:06 PM
2	2016 MILLERSVILLE PIKE	8:15 - 8:30 AM / 3:35 - 3:40 PM
3	316 MANOR AVENUE	7:00 - 7:15 AM / 2:59 - 3:06 PM
4	225 MANOR AVENUE	7:05 - 7:15 AM / 2:45 - 3:00 PM
5	109 MANOR AVENUE	7:05 - 7:15 AM / 2:45 - 3:00 PM
6	38 BLUE ROCK ROAD	8:30 - 8:40 AM / 3:40 - 3:45 PM
7	162 BLUE ROCK ROAD	8:30 - 8:40 AM / 3:40 - 3:45 PM
8	3731 BLUE ROCK ROAD	6:15 - 6:25 AM / 2:55 - 3:00 PM

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 FAX: 717-397-9973  
[www.lcswma.org](http://www.lcswma.org)

Date	8/21/2017
Scale	1" = 1200'
Drawn By	RWG
Layout	B-size 999
Plotted	8/22/2017

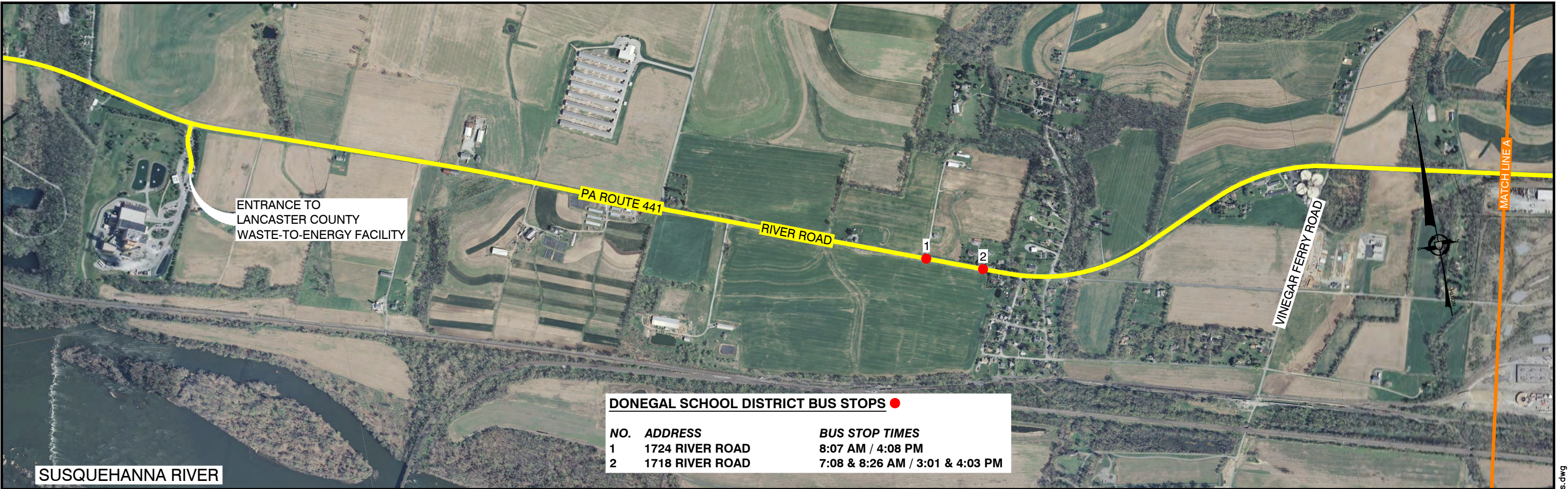
**PENN MANOR SCHOOL DISTRICT**  
 SCHOOL BUS STOPS ALONG PA ROUTE 999



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 PO BOX 4425  
 LANCASTER, PA 17604  
 PHONE: 717-397-9968  
 FAX: 717-397-9973  
 www.lcswma.org

Date	8/21/2017
Scale	1" = 800'
Drawn By	RWG
Layout	B-size
Plotted	8/22/2017

**PENN MANOR SCHOOL DISTRICT**  
 SCHOOL BUS STOPS ALONG RIVER ROAD



ENTRANCE TO  
LANCASTER COUNTY  
WASTE-TO-ENERGY FACILITY

PA ROUTE 441

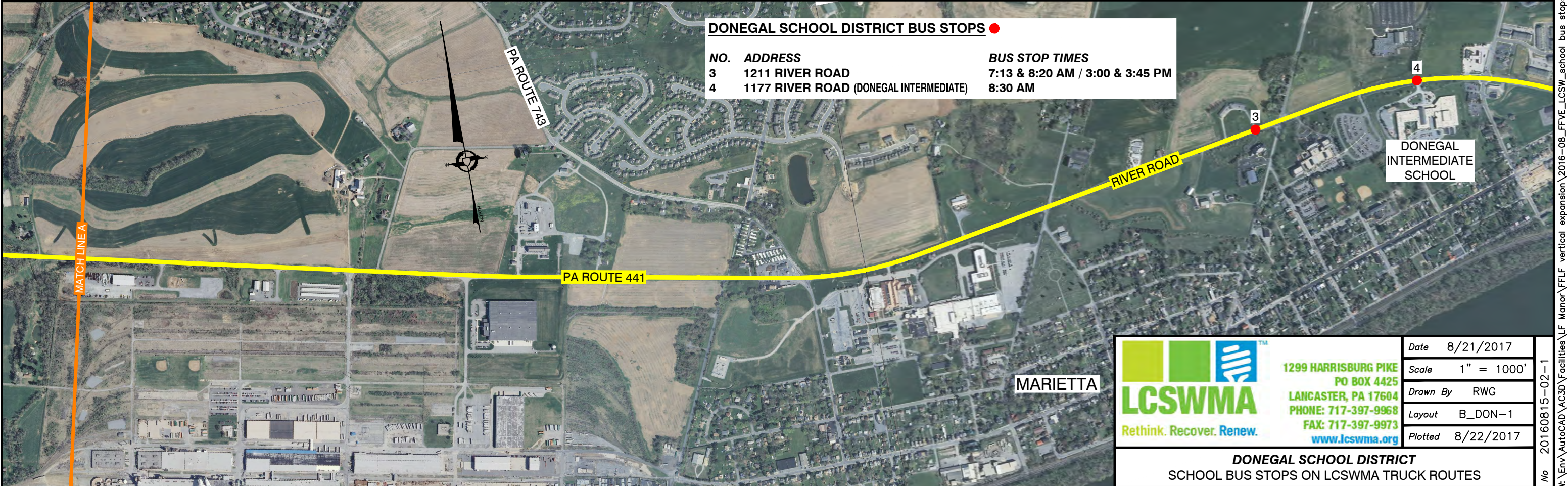
RIVER ROAD

VINEGAR FERRY ROAD

SUSQUEHANNA RIVER

**DONEGAL SCHOOL DISTRICT BUS STOPS**

NO.	ADDRESS	BUS STOP TIMES
1	1724 RIVER ROAD	8:07 AM / 4:08 PM
2	1718 RIVER ROAD	7:08 & 8:26 AM / 3:01 & 4:03 PM



PA ROUTE 743

RIVER ROAD

PA ROUTE 441

MARIETTA

DONEGAL  
INTERMEDIATE  
SCHOOL

**DONEGAL SCHOOL DISTRICT BUS STOPS**

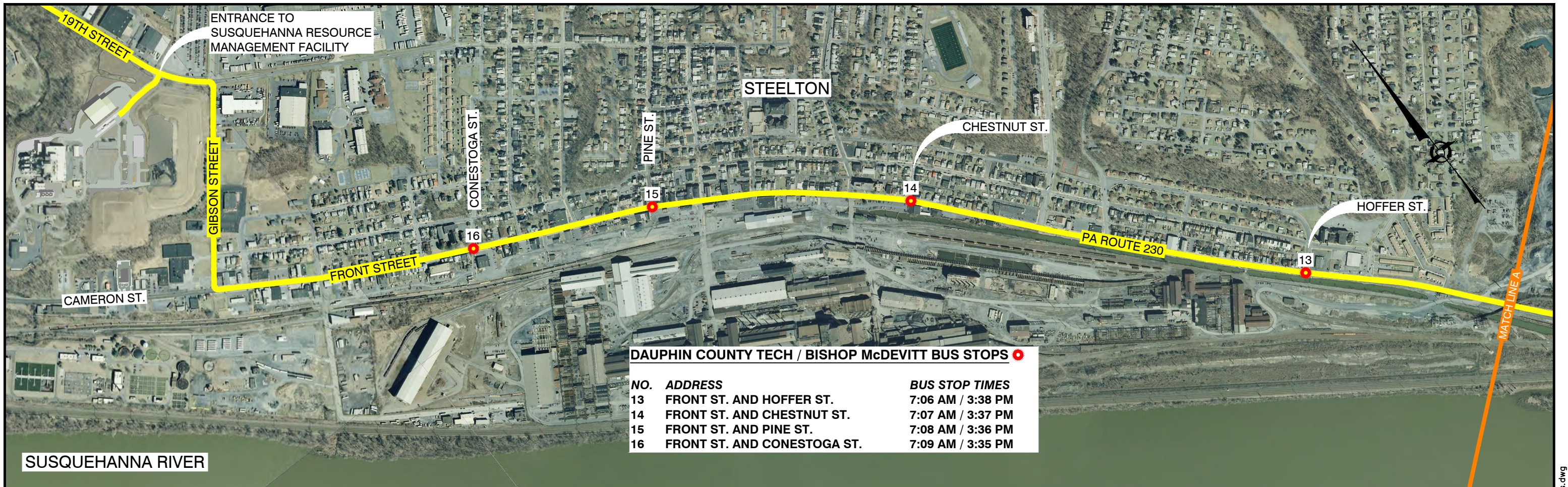
NO.	ADDRESS	BUS STOP TIMES
3	1211 RIVER ROAD	7:13 & 8:20 AM / 3:00 & 3:45 PM
4	1177 RIVER ROAD (DONEGAL INTERMEDIATE)	8:30 AM



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FAX: 717-397-9973  
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Date	8/21/2017
Scale	1" = 1000'
Drawn By	RWG
Layout	B_DON-1
Plotted	8/22/2017

**DONEGAL SCHOOL DISTRICT**  
SCHOOL BUS STOPS ON LCSWMA TRUCK ROUTES



**DAUPHIN COUNTY TECH / BISHOP McDEVITT BUS STOPS**

NO.	ADDRESS	BUS STOP TIMES
13	FRONT ST. AND HOFFER ST.	7:06 AM / 3:38 PM
14	FRONT ST. AND CHESTNUT ST.	7:07 AM / 3:37 PM
15	FRONT ST. AND PINE ST.	7:08 AM / 3:36 PM
16	FRONT ST. AND CONESTOGA ST.	7:09 AM / 3:35 PM



**DAUPHIN COUNTY TECH / BISHOP McDEVITT BUS STOPS**

NO.	ADDRESS	BUS STOP TIMES
12	FRONT ST. AND 'R' ST.	7:03 AM / 3:41 PM



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Date 8/21/2017

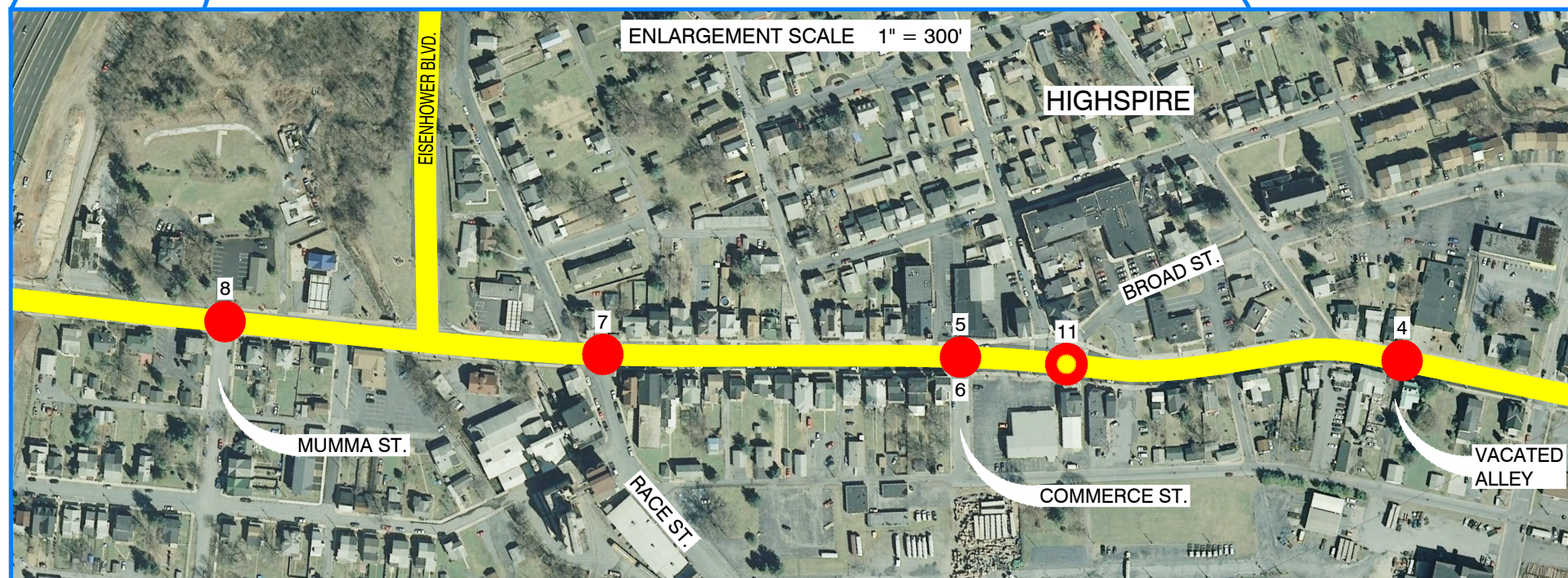
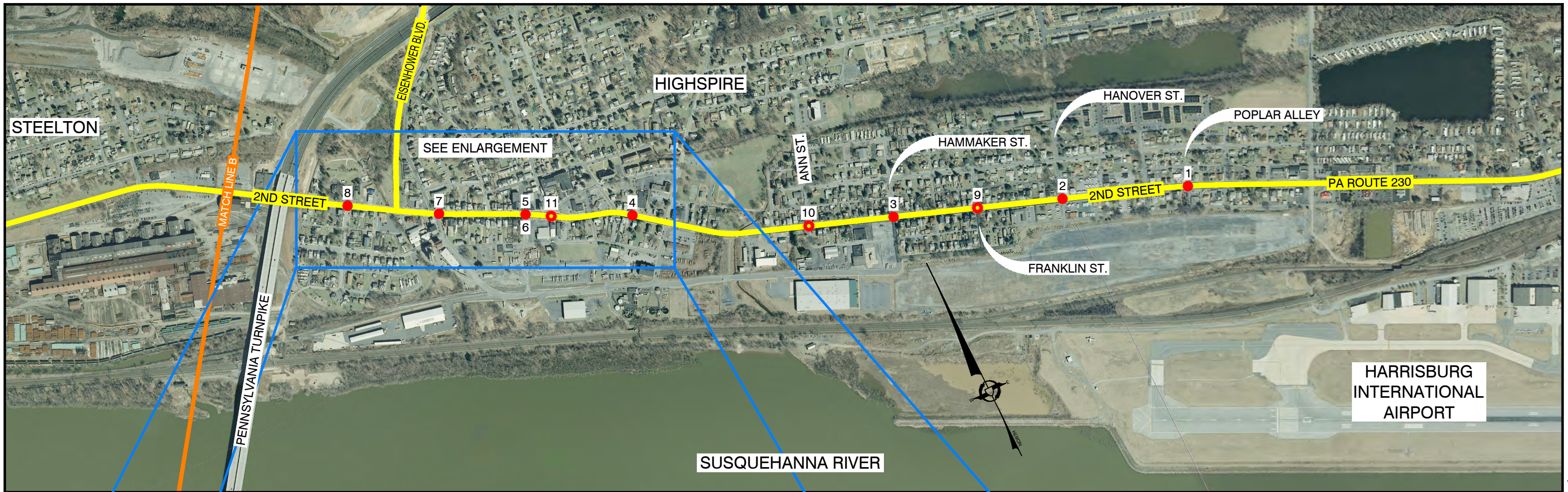
Scale 1" = 800'

Drawn By RWG

Layout B\_SH-1

Plotted 8/22/2017

**STEELTON - HIGHSPIRE**  
SCHOOL BUS STOPS ON LCSWMA TRUCK ROUTES



**STEELTON-HIGHSPIRE SCHOOL DISTRICT BUS STOPS ●**

NO.	ADDRESS	BUS STOP TIMES
1	SECOND ST. AND POPLAR ALLEY	6:55 & 7:54 AM / ??? PM
2	SECOND ST. AND HANOVER ST.	6:54 & 7:53 AM / ??? PM
3	SECOND ST. AND HAMMAKER ST.	6:53 & 7:52 AM / ??? PM
4	SECOND ST. AND VACATED ALLEY	6:52 & 7:51 AM / ??? PM
5	SECOND ST. AND COMMERCE ST. (north side)	7:09 & 8:05 AM / ??? PM
6	SECOND ST. AND COMMERCE ST. (south side)	6:51 & 7:50 AM / ??? PM
7	SECOND ST. AND RACE ST.	7:10 & 8:06 AM / ??? PM
8	SECOND ST. AND MUMMA ST.	6:50 & 7:49 AM / ??? PM

**DAUPHIN COUNTY TECH / BISHOP McDEVITT BUS STOPS ●**

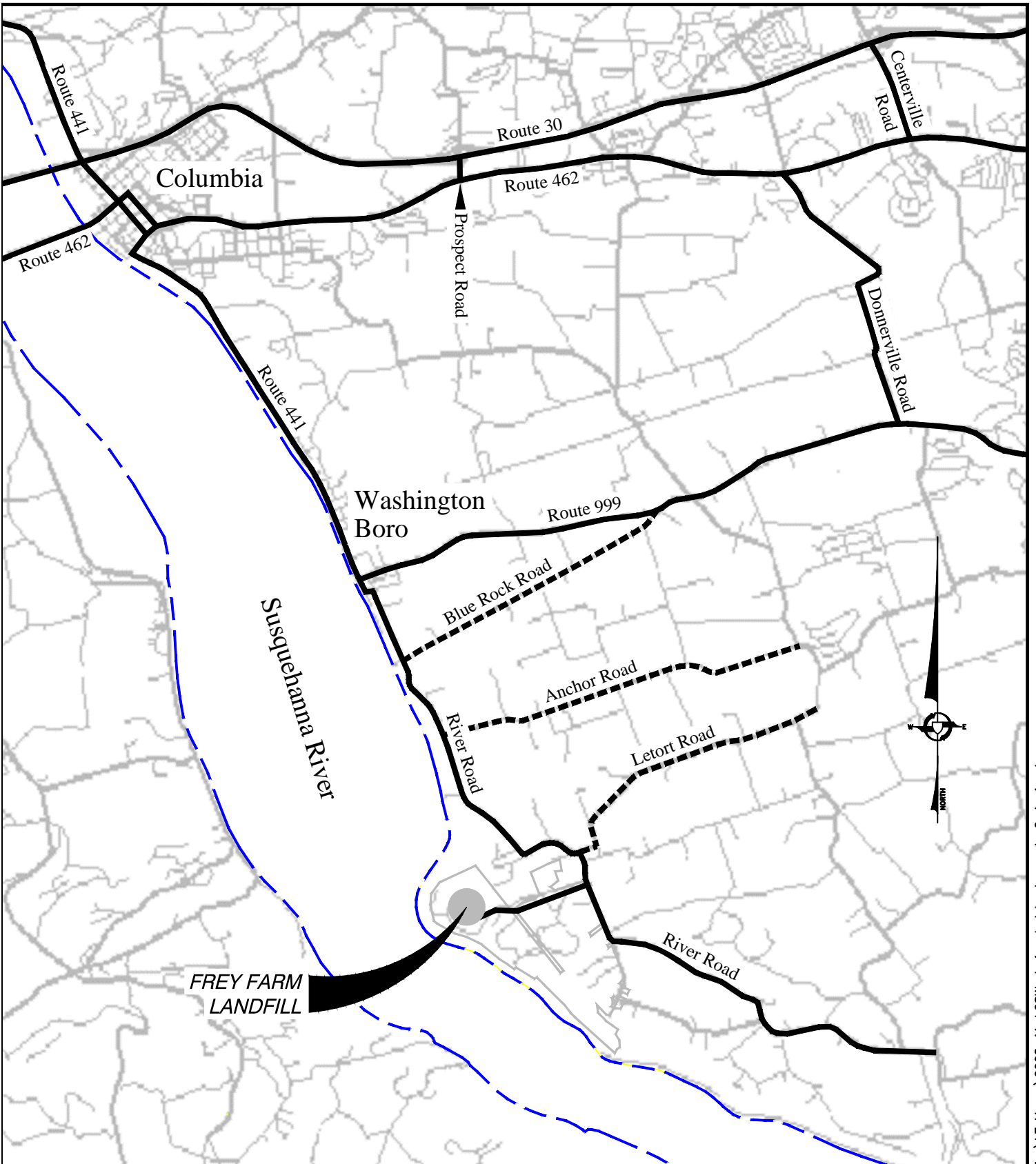
NO.	ADDRESS	BUS STOP TIMES
9	SECOND ST. AND FRANKLIN ST.	6:58 AM / 3:45 PM
10	SECOND ST. AND ANN ST.	6:59 AM / 3:43 PM
11	SECOND ST. AND BROAD ST.	7:00 AM / 3:42 PM



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 FAX: 717-397-9973  
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Date	8/21/2017
Scale	1" = 800'
Drawn By	RWG
Layout	B_SH-2
Plotted	8/22/2017

**STEELTON - HIGHSPIRE**  
SCHOOL BUS STOPS ON LCSWMA TRUCK ROUTES





-  Acceptable Routes
-  Prohibited Routes per Manor Twp ordinance #2-90



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 717-397-9968  
 www.lcswma.org

**FREY FARM LANDFILL  
 HAULER ROUTES**

Drawn By RWG    Scale 1"=1 mile    Date 11/3/08    Drawing No 20051111-08

Plotted 5/26/2016  
 Layout 8.5 x 11