LANCASTER COUNTY SOLID WASTE MANAGEMENT AUTHORITY

TRANSPORTATION COMPLIANCE PLAN

December 2022

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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 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

LCSWMA will designate the Environmental Compliance Manager to serve as the Transportation Compliance Manager. This person will oversee and manage the various compliance activities required by the LCSWMA'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 LCSWMA and representatives from PennDOT, the PSP, and police departments from the respective host municipalities.

B.2 Facility 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 LCSWMA 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". The computer program utilized by LCSWMA for scalehouse activities (PC Scales) automatically records these overweight transactions.

The Transportation Compliance Manager manages the overweight tracking and submits the monthly records to the PA DEP. For any egregious overweight, LCSWMA may contact the Pennsylvania State Police (DOT) to notify PSP of an overweight over 6,500lbs. This database, which is discussed in Section C, will be used to track transporter regulatory compliance. 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

LCSWMA partnered with Manor Township to post signs warning solid waste haulers to not use restricted haul routes to the Frey Farm Landfill. Haul Route Compliance will be monitored by Manor Township Police Department.

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Posted Sign Locations:



River Road and Blue Rock Road Blue Rock Road and PA Route 999 River Road and Letort Road Letort Road and North Duke Street



If LCSWMA witnesses a waste hauler in violation, 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

Due to the amount of regular waste haulers utilizing LCSWMA Facilities having on-board computer/GPS systems that monitoring erratic driving behavior such as speeding, harsh braking and other unsafe behaviors, LCSWMA has entered into an agreement with local police departments to create a task force to help provide resources to the local police departments to enforce unsafe driving practices on routes to LCSWMA Facilities. This task force is partially funded by LCSWMA to help improve safety on the roadways. This task force anticipates the cooperation between Manor Township, Columbia Borough, Susquehanna Regional, and West Hempfield Township Police Departments. LCSWMA reserves the right to implement increasing time delays for infractions, leading up to suspension, from utilizing LCSWMA Facilities.

B.2.2 Facility Compliance Officer Environmental Checks

The second compliance check will be done by LCSWMA 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

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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 <u>six</u>
 <u>inches in height</u>. 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. This information will be entered onto the transaction ticket.

• 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 observed, as well as those radioed by the compliance officers, on the *LCSWMA weight tickets*. 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, the Environmental Compliance Manager, and the Facility Management from the Transfer Station, the

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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 LCSWMA 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 weigh tickets. 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

APPENDIX A

- LCSWMA Overweight Record Form
- Facility Haul Route Speed Limit/Safety Zone Map
- Restricted Haul Routes Map Manor Township

Daily Operational Record of Overweight Vehicles Facilty Name:

Facilty Name:	Comments (Optional)																
	Telephone			,													
	Business Address																
	Carrier / Hauler Name															55	
	Waste Hauler Auth (Optional)																
	Origin: Cty / State												100				
	Reg. State																
	Vehicle License Plate																
	Comb. (Y/N)																
	Gross Vehicle Weight lbs.														2001		
	Time																
¥	Date																

