

October 17, 2023

Oklahoma Department of Environmental Quality  
Land Protection Division  
Attention: Jeff Biddick  
707 N Robinson Ave  
Oklahoma City, OK 73102

**Re: Notice of Deficiency – Technical Review  
Tier II New Permit Application  
PO Box 775  
Eastern Oklahoma Transfer Station, Muskogee County, OK**

Dear Mr. Biddick,

Please see my responses to the Notice of Deficiency (NOD) items below.

1. **Disclosure Statement** – Section 8.0 of the Application includes the disclosure statement as required by OAC 252:515-3-31(g) for new solid waste disposal permits. The disclosure statement uses DEQ's Oklahoma notary form but was modified to be executed in Arkansas. Please resubmit the disclosure statement using either an Arkansas notary form, or have the Oklahoma form executed in Oklahoma.

**RESPONSE:**

Will provide Disclosure Statement Form soon.

2. **Floodplain map** – Figure 2 depicts the floodplain map in the immediate vicinity of the Facility. In accordance with OAC 252:515-3-53, please update the map to show floodplain areas within one mile of the Facility. You may use an alternative scale as needed to ensure the entire one-mile radius is included.

**RESPONSE:**

Please see attached the revised **FIGURE 2 – FLOOD PLAIN MAP**.

3. **Site map** – Figures 4 and 5 show the site map and layout of the Facility, but the waste receiving and processing areas are not identified. Please identify the scale house, tipping floor(s), loading/unloading areas, and other waste management areas that are discussed in the Operating Plan.

**RESPONSE:**

Please see attached the revised **FIGURE 4 – CONTOUR MAP**.

4. **Leachate management** – Appendix C, Section 5 (Leachate Collection) states that leachate is collected in a drain that discharges to a septic tank, then to a leach field located along the western fence line. Please note, leachate must be managed in accordance with one or more of the methods identified in OAC 252:515 Subchapter 13, Part 5, and in a manner that will not cause contamination.

In accordance with DEQ's Industrial Wastewater System regulations at OAC 252:616-9-1(3), the Facility shall not dispose of industrial wastewater or leachate using lateral lines in a leach field as proposed in the Application. The Facility may store leachate in a tank or impoundment meeting the requirements of OAC 252:515-13-52 and haul it off site for disposal. Please provide an alternate method of leachate management, including location and design details for any collection drains, conveyance piping, and leachate storage units.

**RESPONSE:**

Please see attached the revised Operating Plan – **SECTION 5.0 LEACHATE COLLECTION** and **FIGURE 4 – CONTOUR MAP**.

5. **Buffer zones** – In accordance with OAC 252:515-19-38(b), all disposal facilities shall be designed and maintained with a waste-free buffer zone at least 50 feet in width between all waste disposal/handling areas and adjacent property. The buffer zone shall be contained within the permit boundary.

Figure 4 of the Application shows a 200-foot buffer area outside of the fence line of the property. As noted above, the buffer zone should be contained *inside* the permit boundary. Please provide an updated drawing depicting a minimum 50-foot buffer zone within the permit boundary.

**RESPONSE:**

Please see attached the revised **FIGURE 4 – CONTOUR MAP**.

6. **Salvage and recycling** – Appendix C, Section 3.3 (Recyclables) includes a list of source-separated recyclables that will be accepted at the Facility. Please discuss how and where the recyclable materials will be stored, and how long the recyclables are expected to remain onsite before being transported to the appropriate recycling facility. In general, such materials should be stored at the Facility for no longer than 90 days from the date of receipt. Additionally, please discuss how recyclable materials will be reused on site, if applicable.

**RESPONSE:**

Please see attached the revised Operating Plan – **SECTION 3.3 Recyclables**.

7. **Large or bulky items** – In accordance with OAC 252:515-19-92, items that are large, bulky, or heavy must be managed in accordance with a plan approved by DEQ and identified in the permit. Please provide information on how large and/or bulky items will be handled at the Facility.

**RESPONSE:**

Please see attached the revised Operating Plan – **SECTION 3.4 Large or Bulky Items**.

8. **Waste Exclusion Plan** – Appendix C (Operating Plan) includes some details regarding the Waste Exclusion Plan requirements set forth in OAC 252:515-29-3. However, not all requirements were addressed. For ease of review and future reference, please include with the Application a standalone Waste Exclusion Plan that specifically addresses each provision in OAC 252:515-29-3, including details for documenting random load inspections, rejecting prohibited wastes, and notifying DEQ in the event of a rejected load.

**RESPONSE:**

Please see attached the Waste Exclusion Plan.

Terracon Consultants, Inc. and CARDS NEO, LLC appreciate your consideration and response in this matter. If you have any questions or comments or need any additional information, please feel free to contact me at [Drew.Potter@terracon.com](mailto:Drew.Potter@terracon.com) at your convenience.

Sincerely,

**Terracon Consultants, Inc.**

A handwritten signature in black ink that reads 'Drew Potter' in a cursive style.

Drew Potter

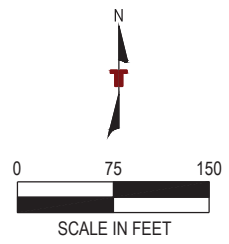
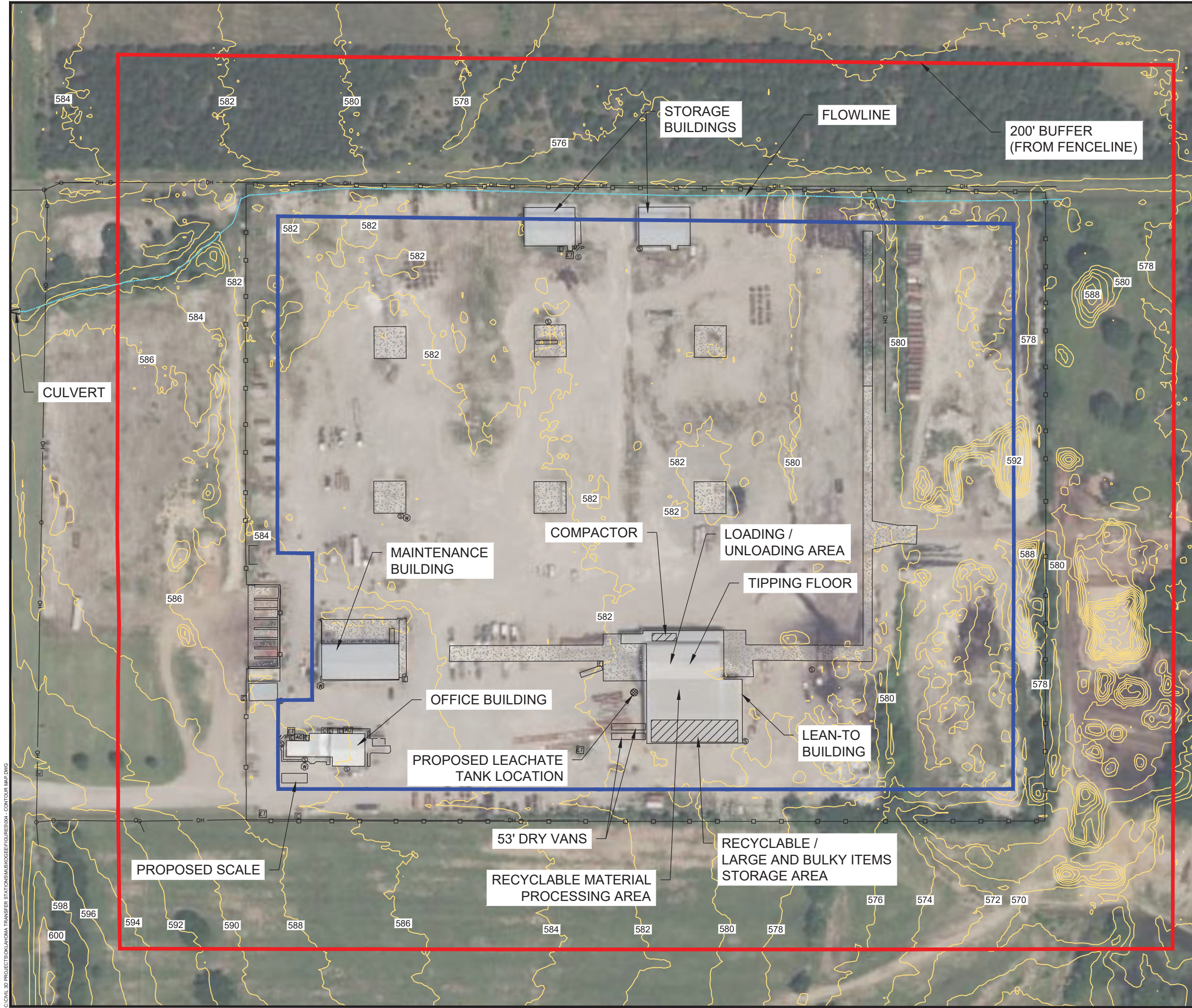
*Staff Environmental Engineer*

Enclosure:      Flood Plain Map  
                     Contour Map







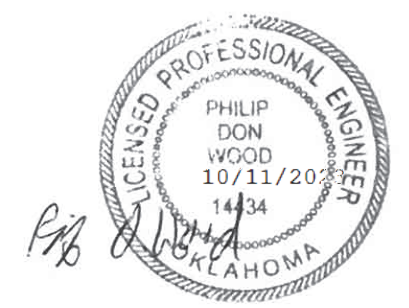


LEGEND:

- FENCE LINE
- 200' BUFFER ZONE
- 50' BUFFER ZONE

NOTES:

- CONTOUR SOURCE: OKLAHOMA BARE EARTH CONTOURS OBTAINED FROM OKMAPS DATED JULY 24, 2019.
- TIPPING FLOOR IS LOCATED INSIDE OF THE LEAN-TO-BUILDING. MATERIAL PROCESSING TAKES PLACE INSIDE OF THE LEAN-TO-BUILDING.



REV.	DATE	BY	DESCRIPTION
0	05/23	DAP	ORIGINAL
1	10/10/23	DAP	REVISOR PER OKLAHOMA DEQ COMMENTS

CONTOUR MAP

TRANSFER STATION PERMIT APPLICATION

CARDS NEO, LLC

CARDS EASTERN OKLAHOMA TRANSFER STATION

MUSKOGEE COUNTY OKLAHOMA

**Terracon**

Consulting Engineers and Scientists

25009 130 SOUTH BRYANT, AR 72022  
PH. (501) 847-9292 FAX. (501) 847-9210

FIGURE 4	
DESIGNED BY:	DAP
DRAWN BY:	DAP
APPVD. BY:	PDW
SCALE:	AS SHOWN
DATE:	OCTOBER 2023
JOB NO.	604-001-03237056
ACAD NO.	004
SHEET NO.:	- OF -



# Operating Plan

CARDS NEO, LLC  
Eastern Oklahoma Transfer Station  
Muskogee, Oklahoma

October 2023  
Project No. 03237056



**Prepared for:**  
CARDS NEO, LLC  
P.O. Box 775  
Tontitown, AR 72770  
(877) 592-2737



**Prepared by:**  
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**Terracon**

Environmental



Facilities



Geotechnical

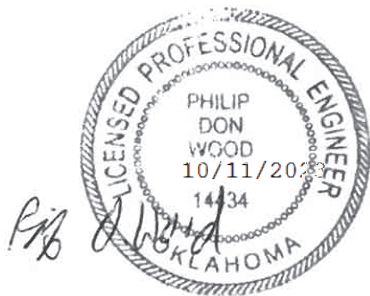


Materials



## PROFESSIONAL ENGINEER'S CERTIFICATION

"I certify to the best of my professional judgment that the following permit application for the proposed solid waste transfer station located on property owned by Donna Crotty Trust and operated by CARDS NEO, LLC. in Muskogee, Oklahoma was prepared in accordance with good engineering practices and applicable Oklahoma Department of Environmental Quality regulations. This certification is contingent on the fact that all information supplied to the signatory authority, at the time of this certification is unquestionably accurate and was provided in good faith."



---

Phil Wood, P.E.  
Oklahoma Professional Engineer No. 14434

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October 11, 2023  
Certification Date

Cert. of Auth. #CA – 4531 exp. 6/30/25



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## 1.0 INTRODUCTION

The CARDS Eastern Oklahoma Transfer Station (Transfer Station), located near Muskogee, Oklahoma, was previously used as a transfer station by Whitting Hill Disposal Service. The Transfer Station is owned by Donna Crotty Trust and operated by CARDS NEO, LLC. The Transfer Station is approximately 5 miles south of the City of Muskogee. The location of the Transfer Station is shown in **APPENDIX B** of this Transfer Station application.

The Transfer Station concept is part of the proposed means of pursuing integrated solid waste management methods for the City of Muskogee and Muskogee County. This Transfer Station will accept waste from the City of Muskogee and Muskogee County. The waste will be transported to permitted landfill facilities.

The Transfer Station is designed and operated to comply with Oklahoma Department of Environmental Quality (Oklahoma DEQ) regulations governing solid waste, hazardous waste, wastewater and stormwater. The facility is solely to be used to transfer solid waste and construction and demolition (C&D) waste from residential and commercial entities and to accept certain recyclables. The Operating Plan for the Transfer Station takes the following items into consideration:

- Efficient layout and operation;
- Acceptable materials and adequate storage;
- Control of litter, insects, odors, and vectors;
- Leachate control;
- Stormwater run-on/run-off control;
- Personnel, supervision, and training;
- Safety;
- Record Keeping; and
- Contingency Plan for hazardous waste receipt.



## 2.0 TRANSFER STATION LAYOUT AND OPERATION

The proposed Transfer Station is designed with the intent of providing an efficient operation that complies with all applicable regulations. The facility is situated to provide efficient traffic control in order to facilitate private and public waste disposal, as well as, the transport of waste and recyclable material from the Transfer Station.

The layout of the Transfer Station facility is shown in the drawing located in **APPENDIX B** of this Transfer Station Permit Application. All of these areas provide efficient and safe access to the public and to transfer vehicles.

### 2.1 On-Site Roads

The on-site roads at the Transfer Station are designed to accommodate all types and sizes of vehicles in a safe and efficient manner. A gravel entrance/ exit is located at the southwest corner of the Transfer Station facility for handling all types of vehicles and equipment. Actual tipping areas for waste disposal are constructed of finished concrete. Drainage is improved to prevent washout or ponding of water on access roads.

### 2.2 Hours of Operation

The hours of operation at the Transfer Station are Monday through Saturday from 6:00 A.M. to 6:00 P.M. each day.

### 2.3 Measuring, Loading, and Unloading

The loading and unloading areas are adequately sized and designed to allow efficient and safe loading and unloading from private vehicles. The loading and unloading areas are shown on **FIGURE 4** of **APPENDIX B**. These areas are constructed of reinforced concrete. Adequate drainage provisions and structures are also provided for these areas. The Transfer Station will implement all necessary safety precautions for protecting workers during waste processing, loading, and unloading operations. See **SECTION 3.0** for a discussion on measures taken to identify and control undesirable waste receipt. The measuring will be performed by local or landfill scales.

### 2.4 Processing Areas

Volumes of incoming loads of all types of acceptable solid waste are weighed at the scale house. The volume of waste is then recorded on standard forms. Documentation is also kept on a volume basis for all outgoing waste loads, including the destination for the waste.

Incoming waste or recyclable material received through the main gate is directed by the manager to either the solid waste tipping floor or the C&D waste tipping floor. The loading and unloading areas are adequately sized and designed to allow efficient and safe loading and unloading from waste collection vehicles. The loading and unloading areas are constructed of reinforced concrete. Adequate drainage provisions and structures are also provided for these areas. The Transfer Station will implement all necessary safety precautions for protecting workers during waste processing, loading, and unloading



operations. See **SECTION 3.0** for a discussion on measures taken to identify and control undesirable waste receipt. The transfer station utilizes refuse trailers, semi-tractor trailer, and loading equipment for operational procedures.

## **2.5 Storage Areas**

The Transfer Station stores various sizes of empty solid waste containers and various transfer station equipment at the site. Most of the equipment that is stored at the Transfer Station is associated with maintenance and operation of the facility. Solid waste and C&D waste received at the transfer station in a given day is processed the same day of receipt. In general, putrescible waste is not stored at the Transfer Station for more than three days. If temporary storage of waste is necessary, it is limited to small amounts of waste material that is stored in the enclosed transfer station that is separate from the facility's office. As a practice, the waste is transported to a permitted disposal facility daily as practical.

## **2.6 Employee Facilities**

Restrooms and an employee area are located within the Transfer Station Office building located at the southwest corner of the property.

### 3.0 ACCEPTABLE MATERIALS AND STORAGE

The Waste Transfer facility receives solid waste, C&D waste, and recyclables from waste collection routes in and adjacent to the Transfer Station. These materials are delivered to the site by CARDS NEO, LLC collection vehicles, public and private collection vehicles, community groups, and private individuals. Access to the facility is presently regulated during normal business hours by Transfer Station employees. Waste excluded from disposal is listed in the following sections.

#### 3.1 Waste Screening

Solid waste and C&D waste are received at the Transfer Station for processing and transferred to area landfills. The majority of waste transported to the facility is by collection vehicles. However, waste is also received from public and private commercial haulers. All incoming loads of waste are visually inspected for the presence of excluded wastes. Excluded wastes include the following:

- Hazardous Waste
- Radioactive Waste
- Regulated Polychlorinated Biphenyls (PCB) Waste
- Asbestos
- Non-Hazardous Industrial Solid Waste (NHIW)
- Explosives
- Medical or infectious wastes (before or after incineration)
- Liquids
- Flammable or volatile substances
- Dead animals

Incoming waste streams are initially evaluated on the tipping floors (see **APPENDIX B** of this Transfer Station Application) by a transfer station operator trained in waste identification and receipt.

After the waste passes the office receipt area, the vehicles are unloaded inside the buildings as previously described. A transfer station operator trained in waste screening inspects every load while each load is dumped and loaded into the Transfer Station walking floor trailer.

#### 3.2 Contingency Plan for Unacceptable Waste Receipt

Unacceptable waste detected in the incoming waste stream is removed and placed in covered storage until the waste can be properly identified and disposed. All solid waste processed at the transfer station is recycled or transported and disposed of at a permitted landfill. In addition, Transfer Station personnel are licensed operators that are trained and certified in the exclusion of hazardous and unacceptable waste.



Records are kept of all unacceptable wastes and their subsequent handling, identification and ultimate disposal. The records include quantities of waste, identification, source of waste, hauler delivering the waste to the facility, date of receipt and removal, and destination of the waste.

### **3.3 Recyclables**

Source separated recyclables are accepted at the Transfer Station. At present, the types of recyclables to be accepted at the facility include the following:

- Old corrugated cardboard (OCC)
- Scrap Metal
- Wood
- Brick
- Concrete Blocks
- Newsprint
- Plastics
- Electronics

These materials are collected from special recyclable material collection routes or from individuals that source separate their own waste material. Every incoming load shall be sorted for recyclable materials. An area inside the waste transfer building shall be designated for storage of each type of recyclable material. Newsprint, plastics, electronics, and OCC shall be stored in bales, storage bins, or loaded into dry van trailers until they are removed from the facility and transported to a recycling facility. When necessary, 53' long dry van trailers shall be present at the facility at all times. When the dry vans are filled to capacity with recyclable materials, they will be transported to a recycling facility. The dry van trailers shall be accessible from the lean-to building via a ramp and dock.

Scrap metal, wood, brick, and concrete blocks shall be separated and stored in a designated area outside of the waste transfer building. Recyclable materials shall remain at the transfer station for no longer than 30 days before being transported to the appropriate recycling facility. If possible, wood, brick, and concrete blocks may be reused on-site for improvements such as landscaping, disguising trash bins, and storage separation for other recyclable materials.

### **3.4 Large or Bulky Items**

Large or bulky items are generally furniture and appliances that regular trash haulers are unable to collect on their regular routes. Large or bulky items shall be unloaded at the transfer station and stored at a designated area inside of the lean-to building. Large or bulky items shall be transported to a MSW landfill as soon as practical. Appliances such as washing machines and dryers are placed in storage bins until they are recycled. These storage bins are located inside the lean-to building. The CARDS Eastern Oklahoma Transfer Station shall not accept any appliances or materials that contain freon. Furniture is

broken down and stored in roll-off bins inside the lean-to building. The storage area for large appliances and furniture is shown on **FIGURE 4** of **APPENDIX B** of this transfer station application.

### **3.5 Operational Contingency Plan**

In addition to the contingency plan for receipt of unauthorized waste (**SECTION 3.2**), the Facility is prepared to address circumstances such as the following:

- Odors,
- Surface or groundwater contamination,
- Spills,
- Equipment breakdowns,
- Fire,
- Dust,
- Excessive noise, and
- Vectors.

Each of the above issues are initially addressed by the practice of moving waste rapidly through the Facility and not storing significant volumes of waste on site. Spills are controlled with the on site drainage system described and with portable absorbent material stored on-site. Equipment breakdowns are addressed immediately by on-site personnel and extra parts are stored on-site.



#### **4.0 CONTROL OF LITTER, INSECTS, ODORS, AND VECTORS**

Vectors are attracted by the presence of garbage and stagnant water. The Transfer Station is properly managed to assure that litter is picked up and the Transfer Station is kept in a neat and orderly fashion. Transfer Station personnel control blowing litter and properly store solid waste at all times. Areas outside of the buildings are patrolled to insure that waste material does not accumulate.

If solid waste at the facility is temporarily stored, it is handled to prevent the attraction, harborage or breeding of insects, rodents and other vectors which may cause the following:

- Harm to public safety and the environment
- Safety hazards to individuals and surrounding properties
- Excessive odor problems, unsightliness and other nuisances

Vectors are controlled by insuring that waste is processed and shipped as quickly as it is received so that no waste accumulation occurs.

The Transfer Station is properly maintained and cleaned routinely to prevent odors and residual waste from accumulating at the tipping area. All waste that is processed during the day is properly secured in walking floor containers for transport to a permitted landfill.

## 5.0 LEACHATE COLLECTION

Leachate, for the purposes of this application for a Transfer Station can be defined as water that comes in contact with the solid waste. The ways that leachate may be generated are as follows:

- Leachate may be generated during the collection process and brought in collection vehicles with the solid waste and C&D waste to the transfer station.
- Precipitation that comes in contact with the solid waste and C&D waste at the Transfer Station. Because the Transfer Station is completely covered the quantity of leachate that is generated from precipitation at the Transfer station is very low.

The Transfer Station shall be designed so that any leachate brought into the building or generated during the various operations at the facility is managed with the waste or collected in a drain that discharges to a leachate tank. The waste transfer building shall have a floor drain, which discharges to a leachate tank located on the west side of the building. The location of the proposed leachate tank is shown on **FIGURE 4** of **APPENDIX B** of this transfer station application. The leachate tank shall be periodically pumped out and disposed of off-site at a wastewater treatment plant. The leachate tank shall be adequately sized to handle the facility's leachate management needs. The leachate tank shall be double-walled per the Oklahoma Corporation Commission Regulation **165:25-2-33(a)**. Only liquid from the waste transfer building shall enter the leachate tank.



## **6.0 STORMWATER**

Stormwater run-on to the site is diverted away from the Transfer Station area utilizing appropriate grading, small swales, and ditches. Because the solid waste and C&D waste are transferred directly from a collection vehicle to the tipping floor inside a covered structure, stormwater does not come in contact with the solid waste.

## 7.0 PERSONNEL, SUPERVISION, AND TRAINING

The Facility employs two to three people to oversee and operate the Transfer Station. The following people are located at the site and responsible for the operation of the Transfer Station:

- Transfer Station Manager
- Operation Manager
- Scale Operator

The Facility trains all new transfer station employees on the overall operation of the facility. In addition, specific job training and responsibilities for each operation are given to all employees. All employees engaged in the collection and transportation of solid waste and/or C&D waste will be trained according to the guidelines set forth in OAC 252:15-29-3. Employees will receive 8 hours of initial basic training in waste exclusion and radioactivity along with 4 hours of annual refresher training. Trained personnel shall be on-site during all hours the facility is open to accept wastes.

### Training topics include:

- Waste Exclusion Policy and Protocol
- Radioactivity Policy and Protocol
- Regulatory Definitions
- Categories of Solid Waste and C&D Waste
- Requirements for Safe Handling of Solid Waste and C&D Waste
- Transporters DoT Training
- Fire Safety
- Spill Clean Procedure
- Hand Hygiene
- Sharps Safety

Training is conducted on-site, in classroom meetings, small discussion groups, in-field exercises, emergency drills, or at the employee's workstation (i.e., on-the-job). Assigned reading materials, problem sets, and other teaching aids may be used to supplement these



activities. Courses and teaching materials developed by the manufacturer are often used for classroom training for equipment operators, either by arranging for the course to be presented onsite or by sending employees to the manufacturer's factory training sessions. Field demonstrations and practice sessions reinforce skills and promote safety awareness.

The employee's supervisor is responsible for on the job training to assure that the employee learns correct procedures; can perform them accurately, reliably, and efficiently; and is safety conscious. Corrective action is taken as soon as an employee is assigned increasingly complex or responsible duties based on demonstrated performance.

### **Training Effectiveness Evaluation**

Training effectiveness is measured by written or oral examinations, or by job performance evaluations. The trainer must enter into the training record that an employee has completed the necessary training successfully.

### **Documentation of Training**

Training records are maintained at the corporate office. They include a written description of the content of each training session, or a copy of the hand-out(s) used to conduct the training, identify attendees and trainer(s), recount dates of training sessions, and record the signatures of trainers and attendees, thus certifying that the training was accomplished.

## 8.0 SAFETY

All Transfer Station provides PPE to their personnel. PPE items (hard hats, gloves, safety goggles, and boots) will be available as needed. In addition, dust masks and hearing protection are provided to personnel on an as-needed basis.

The Transfer Station is equipped with safety equipment consisting of the following:

<u>DESCRIPTION</u>	<u>LOCATION</u>
Fire Extinguishers	Various Locations
Personnel Hygiene Area (restroom)	Transfer Station Office
Break room/Restroom	Transfer Station Office

Fire extinguishers are located at strategic locations at the facility for fire protection by transfer station personnel. In the event of a large fire or emergency the Muskogee Fire Department will be called to the scene.



## 9.0 RECORD KEEPING

The Facility maintains a record of all solid waste that is received from each vehicle at the Transfer Station on a "Daily Log". Information recorded includes the vehicle tag number, amount of solid waste, a description of the waste, and the signature of the person transporting the waste.

The Facility also maintains a record at the Transfer Station office for the estimated quantity of waste processed at the facility and other operational data. The records maintained at the Transfer Station are as follows:

- Estimated quantity of waste received each day;
- Estimated quantity of specific type waste shipped each day;
- Operational records (problems, vector, equipment data and repairs);
- Records of waste not accepted; and
- Destination of material transported.

The records will be provided to the Oklahoma DEQ on request.

## **10.0 CONTINGENCY PLAN**

### **10.1 Equipment Breakdown**

In the case of equipment breakdowns or failures, unapproved waste delivered to the facility, or other excluded waste delivery, the Facility will immediately halt waste transport to the Transfer Station and transport waste directly to an appropriate permitted Landfill.

### **10.2 Fire Protection**

Fire extinguishers are located at strategic locations at the facility for fire protection by transfer station personnel. In the event of a large fire or emergency the Muskogee Fire Department will be called to the scene.

### **10.3 Delivery of Unapproved Wastes**

Incoming waste streams are initially evaluated at the scale house by a scale operator trained in waste identification and receipt. The office personnel are familiar with most of the incoming waste vehicles and the associated wastes. Waste vehicles that the office personnel are not familiar with must identify the source and type of waste they are bringing to the Transfer Station.

After the waste passes the scale house area, the vehicles are unloaded inside the buildings as previously described. A facility operator trained in waste screening inspects every load while each load is dumped and loaded into the Transfer Station trailer.

Solid waste and C&D waste are received at the Transfer Station for processing and transferred to permitted area landfills. Some of the solid waste and C&D waste transported to the facility is by individuals. However, most of the waste is collected using CARDS NEO, LLC container delivery trucks. All incoming loads of waste are visually inspected for the presence of excluded wastes.

Records concerning unapproved waste and its subsequent handling are kept on file. The records will include information on waste identification, the source of waste, the hauler delivering waste to the facility, the date of receipt and removal, and the destination of the waste.

### **10.4 Spills**

Spills (leachate) occurring inside of the facility will be immediately controlled and cleaned-up by personnel at the Transfer Station. Spills occurring outside of the covered area of the Transfer Station will be immediately contained and cleaned-up. Clean-up of spills consists of utilizing absorbent material stored on site until the spilled material is sufficiently dry enough to incorporate into the routine waste stream.



### **10.5 Odors**

Because of an efficient layout and the ability to process waste indoors on a daily basis, odors are kept to a minimum at the Transfer Station. If odors become a problem, provisions will be made for more frequent cleaning of the Facility and more frequent removal of all waste streams. Also, the transfer station is an enclosed structure that is separated from the office/maintenance building.

### **10.6 Dust, Noise, and Vectors**

Dust is not considered to be a problem at the Transfer Station because most of the roads are gravel. Noise problems should not be a problem at the Transfer Station due to the fact that only the disposal equipment is utilized on a continual basis. All equipment is maintained in good operating order to reduce the noise associated with the facility. The Transfer Station is managed to assure that vector control is properly maintained by processing all incoming waste/recyclable material immediately.

# Waste Exclusion Plan

CARDS NEO, LLC  
Eastern Oklahoma Transfer Station  
Muskogee, Oklahoma

October 2023  
Project No. 03237056



**Prepared for:**  
CARDS NEO, LLC  
P.O. Box 775  
Tontitown, AR 72770  
(877) 592-2737

**Prepared by:**  
Terracon Consultants, Inc.  
25809 Interstate 30 South  
Bryant, Arkansas 72022  
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**Terracon**

Environmental



Facilities



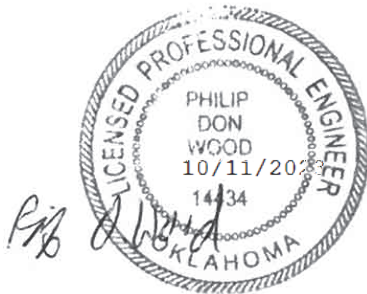
Geotechnical



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## PROFESSIONAL ENGINEER'S CERTIFICATION

"I certify to the best of my professional judgment that the following permit application for the proposed solid waste transfer station located on property owned by Donna Crotty Trust and operated by CARDS NEO, LLC. in Muskogee, Oklahoma was prepared in accordance with good engineering practices and applicable Oklahoma Department of Environmental Quality regulations. This certification is contingent on the fact that all information supplied to the signatory authority, at the time of this certification is unquestionably accurate and was provided in good faith."



Phil Wood, P.E.  
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## 1.0 INTRODUCTION

The CARDS Eastern Oklahoma Transfer Station (Transfer Station), located near Muskogee, Oklahoma, was previously used as a transfer station by Whitting Hill Disposal Service. The Transfer Station is owned by Donna Crotty Trust and operated by CARDS NEO, LLC. The Transfer Station is approximately 5 miles south of the City of Muskogee. The location of the Transfer Station is shown in **APPENDIX B** of this Transfer Station application.

Solid waste and C&D waste are received at the Transfer Station for processing and transferred to area landfills. The majority of waste transported to the facility is by collection vehicles. However, waste is also received from public and private commercial haulers. All incoming loads of waste are visually inspected for the presence of excluded wastes. Excluded wastes include the following:

- Hazardous Waste
- Radioactive Waste
- Regulated Polychlorinated Biphenyls (PCB) Waste
- Asbestos
- Non-Hazardous Industrial Solid Waste (NHIW)
- Explosives
- Medical or infectious wastes (before or after incineration)
- Liquids
- Flammable or volatile substances
- Dead animals

Incoming waste streams are initially evaluated on the tipping floors (see **APPENDIX B** of this Transfer Station Application) by a transfer station operator trained in waste identification and receipt.

After the waste passes the office receipt area, the vehicles are unloaded inside the building as previously described. A transfer station operator trained in waste screening inspects every load while each load is dumped and loaded into the Transfer Station walking floor trailer.

## 2.0 WASTE EXCLUSION PLAN REQUIREMENTS

Section **252:515-29-3** of TITLE 252 - DEPARTMENT OF ENVIRONMENTAL QUALITY CHAPTER 515. MANAGEMENT OF SOLID WASTE states the following:

- (a) Random inspections.** The WEP shall include procedures for conducting random inspections of incoming loads unless other steps are taken to ensure that incoming loads do not contain prohibited wastes.
- (b) Inspection records.** The WEP shall include provisions for maintaining records of the random inspections performed and the results of those inspections. The records shall include, as a minimum:

  - (1) date and time of the inspection;
  - (2) person conducting the inspection; and
  - (3) results of the random inspection.
- (c) Personnel training.** All gate attendants and disposal facility operators shall receive an initial eight (8) hours of basic training in waste exclusion and radioactivity, as related to the WEP.

  - (1) **Curriculum.** The WEP shall detail the training curriculum, to at a minimum include review of regulatory definitions and requirements for handling of waste as well as the facility's WEP implementation procedures.
  - (2) **Documentation.** The WEP shall specify how employee training will be documented.
  - (3) **Refresher.** The WEP shall include a minimum of four hours per year annual refresher training.
- (d) Trained personnel on-site.** Trained personnel shall be on-site during all hours the facility is open to accept wastes.
- (e) Notification of rejected waste.**

  - (1) The DEQ shall be notified by the end of the next working day of:
    - (A) any waste identified and rejected prior to receipt as a prohibited waste; or
    - (B) any load identified and rejected at the gate, during random inspections, or upon disposal at the working face, as a prohibited waste.
  - (2) Such notification shall describe the reason for rejection and include:
    - (A) the date of rejection;
    - (B) the name, address, phone number and contact person of the waste generator when such data can be obtained; and/or
    - (C) the name of driver, tag number of the vehicle, carrier name, address, telephone number and contact person when such data can be obtained.



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**(f) Safe storage.** The WEP shall include procedures for the safe handling and storage of prohibited wastes until proper disposal can be arranged.

**(g) Proper disposal.** The WEP shall include procedures to ensure prohibited wastes are disposed at a facility permitted to accept the waste.

**(h) Verification of disposal.** The WEP shall include procedures for verification of proper disposal of prohibited wastes.

### 3.0 WASTE EXCLUSION PLAN

#### Response to Section 252:515-29-3 (a)

Random inspections of incoming loads shall be performed periodically. A walk around of the truck to examine its contents and check for smoke or suspicious odors shall be performed during random inspections. Interviewing customers is another method that can be used to help ensure that no unacceptable materials shall be unloaded at the Facility. If unacceptable materials are found prior to unloading, the vehicle shall not be allowed to unload at the Facility.

#### Response to Section 252:515-29-3 (b)

Records are kept of all random inspections. These records include time and date of the inspection, person conducting the inspection, and results of the inspection. The results of the random inspection shall include, as a minimum: types of waste inspected and if the waste is acceptable, prohibited, hazardous, or non-hazardous. Random inspection records are maintained at the transfer station office and the corporate office

#### Response to Section 252:515-29-3 (c)

All employees engaged in the collection and transportation of waste or operation of the waste transfer station will be trained according to the guidelines set forth in **OAC 252:515-29-3**. Employees will receive 8 hours of initial basic training in waste exclusion and radioactivity along with 4 hours of annual refresher training.

#### Response to Section 252:515-29-3 (c)(1)

The Facility trains all new transfer station employees on the overall operation of the facility. In addition, specific job training and responsibilities for each operation are given to all employees. All employees engaged in the collection and transportation of municipal solid waste and/ or C&D waste will be trained according to the guidelines set forth in **OAC 252:15-29-3**. Employees will receive 8 hours of initial basic training in waste exclusion and radioactivity along with 4 hours of annual refresher training. Trained personnel shall be on-site during all hours the facility is open to accept wastes.

#### Training topics include:

- Waste Exclusion Policy and Protocol
- Radioactivity Policy and Protocol
- Regulatory Definitions
- Categories of Solid Waste and C&D Waste
- Requirements for Safe Handling of Solid Waste and C&D Waste
- Transporters DoT Training
- Fire Safety
- Spill Clean Procedure
- Hand Hygiene
- Sharps Safety

Training is conducted on-site, in classroom meetings, small discussion groups, in-field exercises, emergency drills, or at the employee's workstation (i.e., on-the-job). Assigned reading materials, problem sets, and other teaching aids may be used to supplement these activities. Courses and teaching materials developed by the manufacturer are often used for classroom training for equipment operators, either by arranging for the course to be presented onsite or by sending employees to the manufacturer's factory training sessions. Field demonstrations and practice sessions reinforce skills and promote safety awareness.

The employee's supervisor is responsible for on-the-job training to assure that the employee learns correct procedures; can perform them accurately, reliably, and efficiently; and is safety conscious. Corrective action is taken as soon as an employee is assigned increasingly complex or responsible duties based on demonstrated performance.

Training effectiveness is measured by written or oral examinations, or by job performance evaluations. The trainer must enter into the training record that an employee has completed the necessary training successfully.

#### **Response to Section 252:515-29-3 (c)(2)**

Training records are maintained at the corporate office. They include a written description of the content of each training session, or a copy of the hand-out(s) used to conduct the training, identify attendees and trainer(s), recount dates of training sessions, and record the signatures of trainers and attendees, thus certifying that the training was accomplished.

#### **Response to Section 252:515-29-3 (c)(3)**

Employees will receive 8 hours of initial basic training in waste exclusion and radioactivity along with 4 hours of annual refresher training.

#### **Response to Section 252:515-29-3 (d)**

Trained personnel shall be on-site during all hours the facility is open to accept wastes.

#### **Response to Section 252:515-29-3 (e)(1)**

CARDS Eastern Oklahoma Transfer Station shall not accept any hazardous wastes as defined in **OAC 252:515-19-31**. Employees will screen the waste to preclude any hazardous or other unacceptable waste from entering the facility. Additionally, the facility will not accept radioactive materials or controlled substances for treatment and disposal.

As a secondary precaution, CARDS NEO, LLC. will work with their treatment facility personnel to ensure only appropriate waste is accepted and treated. Upon arrival of waste, treatment facility personnel will examine the accompanying documentation to ensure the waste is on record with the facility. Prior to offloading the transport vehicle, the waste will be inspected so that it can be done safely without danger to facility personnel, to verify that the waste is appropriate and approved for acceptance. If any unacceptable wastes are discovered prior to unloading, they will not be unloaded and CARDS will be required to



remove the waste from the treatment facility and arrange for lawful disposition of the waste in compliance with regulations. The treatment facility will maintain records of any unauthorized waste received at the facility and returned to the source.

Oklahoma DEQ shall be notified by the end of the next working day of any waste identified and rejected prior to receipt as a prohibited waste or any load identified and rejected at the site during inspection.

**Response to Section 252:515-29-3 (e)(2)**

Notification of rejected waste shall include information such as the reason for rejection and include the date of rejection, the name, address, phone number, and contact person when such data can be obtained and or the name of driver, tag number of the vehicle, carrier name, address, telephone number and contact person when such data is obtained.

**Response to Section 252:515-29-3 (f)**

Unacceptable waste detected in the incoming waste stream is removed and placed in covered storage until the waste can be properly identified and disposed of at a permitted site. If possible, the party that deposited the waste shall be contacted to retrieve the prohibited waste. If this option is not feasible, the waste shall be stored at a designated area, in containers approved under **RCRA Title 40 CFR, Chapter 1, Subchapter I, Part 262, Subpart C, 262.30**, in the waste transfer building.

Per **RCRA Title 40 CFR, Chapter 1, Subchapter I, Part 263.12(a)** and **RCRA Title 40 CFR, Chapter 1, Subchapter I, Part 268, Subpart E, 268.50(a)(3)**, hazardous waste shall not be stored at a transfer facility for a period of ten (10) days or more. However, the Facility shall make all necessary efforts to remove the prohibited waste from transfer station as soon as possible.

**Response to Section 252:515-29-3 (g)**

Prohibited wastes shall be disposed of at a facility permitted to accept the waste. There are several sites local to the CARDS Eastern Oklahoma Transfer station that accept hazardous waste. Some of these sites are listed below.

- Clean Earth Specialty Waste Solutions, Inc (f.k.a. Stericycle Specialty Waste Solutions, Inc.)
  - Address: 2120 Southwest Boulevard, Tulsa, OK 74107
- Systech Environmental Corporation – Tulsa Resource Recovery Facility
  - Address: 2701 N. 145<sup>th</sup> East Avenue, Tulsa, OK 74116
- US Ecology Tulsa, Inc.
  - Address: 2700 South 25<sup>th</sup> West Avenue, Tulsa, OK 74107

Additionally, there are several other sites local to the CARDS Eastern Oklahoma Transfer Station that accept different types of hazardous waste. Prohibited wastes shall be

transported to a site that accepts the specific type of prohibited waste. More information on sites that accept hazardous wastes can be found on the Oklahoma DEQ website. The website URL for a list of facilities that accept hazardous waste in Oklahoma is below:

<https://www.deq.ok.gov/land-protection-division/waste-management/hazardous-waste/hazardous-waste-permitting-and-corrective-action-section/>

#### **Response to Section 252:515-29-3 (h)**

CARDS NEO, LLC. shall receive verification of proper disposal from the disposal site. Verification of proper disposal shall include quantities of waste, identification, source of waste, hauler delivering the waste to the facility, date of receipt and removal, and destination of the waste.

Section **252:515-29-4** of TITLE 252 - DEPARTMENT OF ENVIRONMENTAL QUALITY CHAPTER 515. MANAGEMENT OF SOLID WASTE states the following:

#### **Maintain Records**

Appropriate records shall be maintained in the operating record to demonstrate compliance with the requirements of this Subchapter.

#### **Response to Section 252:515-29-4**

Records are kept of all unacceptable wastes and their subsequent handling, identification and ultimate disposal. The records include quantities of waste, identification, source of waste, hauler delivering the waste to the facility, date of receipt and removal, and destination of the waste.

The Facility maintains a record of all solid waste that is received from each vehicle at the Transfer Station on a "Daily Log". Information recorded includes the vehicle tag number, amount of solid waste, a description of the waste, and the signature of the person transporting the waste.

The Facility also maintains a record at the Transfer Station office for the estimated quantity of waste processed at the facility and other operational data. The records maintained at the Transfer Station are as follows:

- Estimated quantity of waste received each day;
- Estimated quantity of specific type waste shipped each day;
- Operational records (problems, vector, equipment data and repairs);
- Records of waste not accepted; and
- Destination of material transported.

The records shall be provided to the Oklahoma DEQ on request.