

CLEAN HARBORS RYLEY COMMUNITY COMPLAINT RESPONSE PLAN

1. Purpose

Having impacts on the local community from Ryley Facility operations can result in short and long-term problems in areas such as: regulatory compliance and community relations. Odours are an inherent part of the operations of landfills and transfer station facilities and must be properly and proactively managed. It is important to understand that it is our host community that is affected by odours and other issues from our operations. The management and control of off-site impacts is not always an easy task.

The purpose of this Community Complaint Response Plan is to establish standard procedures to be followed in actively handling and managing odour issues and complaints. The plan establishes resources and procedures for collecting data pertinent to complaints and defines methods for responding to complaints. The plan is divided into four main sections. Section 2 deals with the complaint processing and procedure of receiving the complaint and handling the complainant. Section 3 describes the gathering of the environmental data. Section 4 outlines procedures implementation of any corrective actions. Section 5 includes notifications, record keeping and reporting procedures for documentation regarding odour management and complaints.

2. Compliant Processing

When a complaint is received, it should be routed to the Facility General Manager or designee. These people are the only site personnel authorized to receive the complaint except in the event both are gone and unable to be reached.

The Facility General Manager or designee should then discuss the compliant issue with the complainant. The site-specific list of discussion points referenced should be used as a guide during this conversation.

a. Odour Complaints

- At the time the complaint is received, the Facility General Manager or designee should complete the Odour Complaint Call Log Form found in Appendix A, paying special attention to recording the specific time and location of the detected odours. When answering a complaint call:
 - Get caller's name address and telephone number.
 - Do not argue with the complainant.
 - Be sympathetic to the person's situation; tell them you are sorry for their inconvenience.
 - Let them air all their frustrations.
 - Ask questions pertaining to the odour complaint form such as:
 - What type of odour do you smell?
 - How strong is the odour?
 - When did you first begin smelling the odour?
 - Has the same odour been noticed before?
 - What direction is the odour coming from?
 - Was/Is the weather unusual in any way when you smelled the odour?
 - Ask if the neighbour wishes a follow-up check/communication with the Facility General Manager or designee.

- Tell the complainant what your course of action is to help with the problem.
- Tell the complainant that you will follow-up to make sure the problem has been resolved.
- The Site Manager or designee should:
 - Visit the location of the complaint to confirm odour. The visit should occur shortly after the complaint is received.
 - Speak to the supervisors if necessary (if source may be from their area).
 - Check weather station data for the specific time and date of the odour complaint. Record the relevant data on Odour Complaint Call Log Form.
- Make follow-up call(s) to the complainant as required. The follow-up call should include, at a minimum:
 - The manager's findings concerning the complaint.
 - The source of the odours, if determined.
 - The duration of the odour, if known.
 - Any corrective measures if odours are from the facility.
- File the Odour Complaint Call Log Form in an accessible electronic file folder.

b. Other Complaints

Other complaints will be received and handled similar to an odour complaint but more specific to the style of complaint received.

3. Weather Data Collection

The facility has installed an on-site meteorological station to record meteorological data. The meteorological station records data at minimum 1-minute intervals which is documented using electronic downloads. The site has devices capable of measuring the following meteorological parameters:

- Wind Direction and Speed
- Rainfall/Precipitation Amounts
- Temperature

4. Corrective Actions

To prevent further complaints, the facility should:

- Compare present odour complaint received to past odour complaints. Determine any correlation between the complaints. For example, do the complaints come at a specific time of day or when a specific operation is taking place on the site?
- Review list of common on-site sources for the cause of the odour complaint.
- Identify corrective measures for all potential odour sources. Some examples are:
 - Revamp housekeeping and operational controls of landfill waste.
 - For one-time events that involve disposing of odorous waste, dispose of in a dedicated trench or pit, cover frequently, and utilize an odour control agent misted around the perimeter of the disposal area.
 - Add liquid odour control chemicals directly to leachate or sludge tanker truck.
 - Apply daily cover.
 - Evaluate potential pre-treatment of odorous waste streams with customer.
- Implement and document corrective measures.

When the Manager or designee returns to the site:

- Speak to the supervisors if necessary (if source may be from their area).
- Document all findings as well as a record of your communication with the neighbour.
- Complete the Odour Complaint Log Form and internal incident report
- Report back to the neighbours if so requested.

Complaints are recorded upon receipt using the Odour Complaint Call Log Form. On-site wind speed and direction are recorded prior to initiating an off-site investigation of the complaint.

- The complaint is investigated by the Manager, or designated company representative, as soon as possible after receipt.
- The Manager is responsible for notifying the 24-hour Environmental Hotline of the Alberta Environment and Parks (AEP) within two hours of the complaint.
- The Manager is responsible for completing a Notification Report email to Facility management, CAO of Village of Ryley, CAO of Beaver County and AEP.
- The purpose of the investigation by the Manager is to substantiate the complaint in order for Clean Harbors to identify the specific source/cause and take the appropriate steps to rectify the situation.
- The complaint, including details of location, time of day, nature of the complaint, weather conditions (including on-site wind speed and direction, cloud conditions, local precipitation and temperature) and any on-site operating circumstances are documented on the Complaint Report form.
- Subject to the investigation of the complaint and any potential on-site operating conditions associated with the complaint, corrective actions are taken by the Manager, as appropriate.
- Results of the investigation, corrective actions taken, or reasons for no action are documented by completing the Odour Complaint Log Form and an internal incident report kept on file by Clean Harbors.
- A direct response from Clean Harbors regarding the complaint investigation, findings and corrective actions is provided to the complainant within 24 hours, if requested.

5. Notification

A summary of the complaint investigation, findings and corrective actions is to be provided to the CAO of Village of Ryley and the CAO of Beaver County within 24 hours, or one business day. Follow up information will be provided as appropriate depending on the nature and duration of the situation leading to the complaint.

A summary of all complaints received at the facility is provided to the CAO of Village of Ryley, CAO of Beaver County and AEP. This includes corrective actions taken to address the specific complaint.

A summary of all complaints received at the facility is included in the Annual Landfill Report which will be submitted to the AEP by March 31st each year. Copies of the report are also provided to CAO of Village of Ryley, CAO of Beaver County and posted on the Clean Harbors website.

Appendix A: Odour Complaint Call Log Form

Caller Information <i>(Recommended)</i>				
Caller name <i>(optional)</i>		Phone number <i>(optional)</i>		
Call Date		Call Time		
Issue details <i>(Recommended)</i>				
Location where air quality or odour issue was experienced				
Alleged source of air quality or odour issue				
When was the air quality or odour issue first noticed? How long did it last?				
<input type="checkbox"/> One time	Start time:		End time:	
<input type="checkbox"/> Continuous since	Date:		Time:	
<input type="checkbox"/> Daily	Time of day		Frequency	
Intensity <i>(Optional; used primarily for odours)</i>				
<input type="checkbox"/> Faint: odour barely detectable (e.g. have to be standing still, facing into the wind to detect odour)				
<input type="checkbox"/> Moderate: odour is easily detected but not overpowering (e.g. can detect odour while walking and breathing normally)				
<input type="checkbox"/> Strong: odour is penetrating (e.g. can be detected easily, detected at all times and is hard to escape)				
Description <i>(Optional; used primarily for odours, checking off as applies)</i>				
Chemical	Earthy		Offensive	
<input type="checkbox"/> Acidic	<input type="checkbox"/> Grass		<input type="checkbox"/> Garbage	
<input type="checkbox"/> Bleach	<input type="checkbox"/> Hay		<input type="checkbox"/> Garlic/Onion	
<input type="checkbox"/> Glue	<input type="checkbox"/> Mould		<input type="checkbox"/> Rancid	
<input type="checkbox"/> Mothballs	<input type="checkbox"/> Peat-like		<input type="checkbox"/> Sour milk	
<input type="checkbox"/> Nail polish	<input type="checkbox"/> Pine		<input type="checkbox"/> Sweet & sour	
<input type="checkbox"/> Petroleum	<input type="checkbox"/> Swamp		<input type="checkbox"/> Rotten eggs	
<input type="checkbox"/> Plastic	<input type="checkbox"/> Wood		<input type="checkbox"/> Rotting meat	
<input type="checkbox"/> Rubbery	<input type="checkbox"/> Yeast		<input type="checkbox"/> Rotting vegetables	
<input type="checkbox"/> Solvent			<input type="checkbox"/> Skunk	
<input type="checkbox"/> Tar			<input type="checkbox"/> Urine	
<input type="checkbox"/> Turpentine			<input type="checkbox"/> Vomit	
<input type="checkbox"/> Vinegar			<input type="checkbox"/> Yeast	
<input type="checkbox"/> Varnish				

Medicinal	Fecal	Putrid
<input type="checkbox"/> Alcohol	<input type="checkbox"/> Manure	<input type="checkbox"/> Burning carcasses
<input type="checkbox"/> Ammonia	<input type="checkbox"/> Septic	<input type="checkbox"/> Dead animal
<input type="checkbox"/> Methanol	<input type="checkbox"/> Sewer	<input type="checkbox"/> Decay
Fruity	Floral	Smoky
<input type="checkbox"/> Citrus	<input type="checkbox"/> Flowers	<input type="checkbox"/> Burnt plastic
<input type="checkbox"/> Fermented	<input type="checkbox"/> Fragrant	<input type="checkbox"/> Burnt rubber
<input type="checkbox"/> Fruity	<input type="checkbox"/> Herbal	<input type="checkbox"/> Coffee-like
<input type="checkbox"/> Over ripe fruit	<input type="checkbox"/> Perfume	<input type="checkbox"/> Exhaust
	<input type="checkbox"/> Spicy	<input type="checkbox"/> Grass-smoke
		<input type="checkbox"/> Wood-smoke
Fishy	Other	
<input type="checkbox"/> Dead fish		

Weather conditions *(Recommended; at the time the issue was noticed)*

General Conditions	Cloud Cover	Wind speed	Wind Direction
<input type="checkbox"/> Dry	<input type="checkbox"/> Clear	<input type="checkbox"/> None	What direction was the wind coming from?
<input type="checkbox"/> Rainy	<input type="checkbox"/> Light cloud	<input type="checkbox"/> Light	
<input type="checkbox"/> Foggy	<input type="checkbox"/> Scattered cloud	<input type="checkbox"/> Steady	
<input type="checkbox"/> Snowy	<input type="checkbox"/> Overcast	<input type="checkbox"/> Strong/Gusting	

Action Taken *(Recommended)*

Investigation Results:	
Actions Taken:	
AEP Notification: (Contact must be made within two hours of the complaint)	Time:
Company Representative:	AEP Incident Number:
Incident Completion Date:	