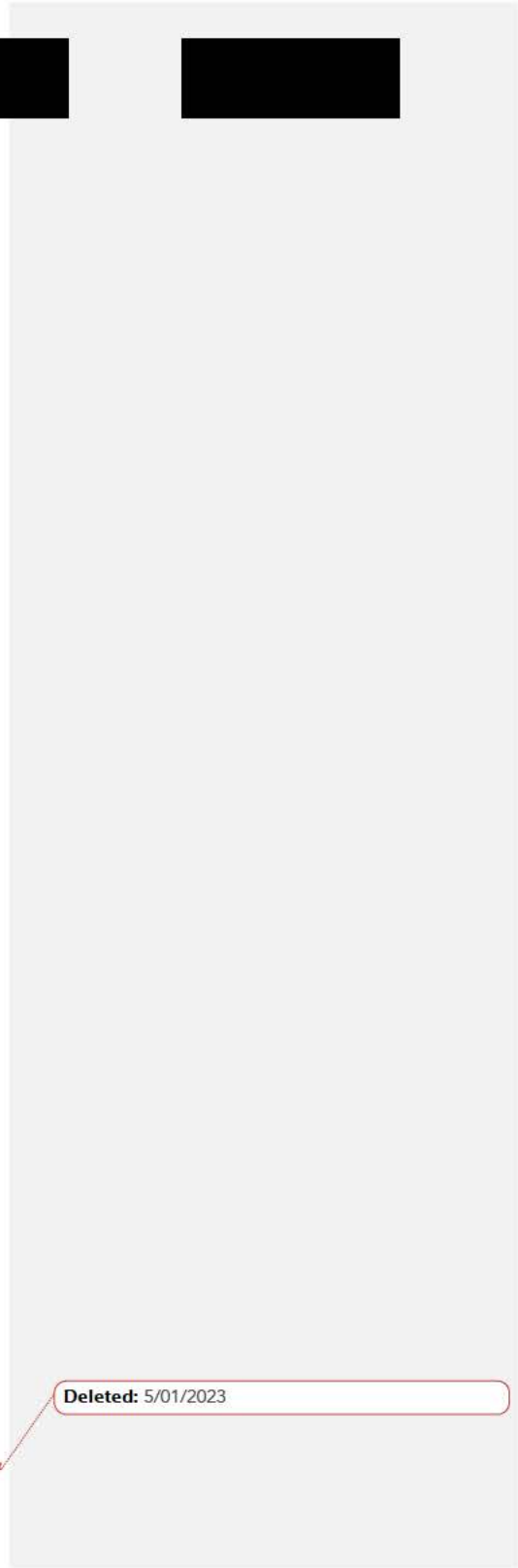


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PURPOSE

Development, implementation, and maintenance of the Plymouth Processing Facility IDEM Operations Plan (Operations Plan) will provide Divert the tools and resources to comply with the requirements of the Solid Waste Processing (SWP) Permit (#50-006) issued by the Indiana Department of Environmental Management Office of Land Quality (IDEM OLO) effective through May 25, 2028. Authorized waste and associated processing residuals are to be received, processed and managed per the requirements of the SWP Permit and applicable state and federal regulations. The facility must submit changes to the Operations Plan to IDEM OLO for review and written approval before implementation.

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Table of Contents

Purpose	2
Operations Summary	5
Facility Operations	9
Operating Hours	9
Access Roads and Parking	9
Material Management	9
Slurry Tankers	9
Load Checking Program	9
Retail Outlet Inspection	10
General Visual Inspection	10
Sorting Procedure	11
Prohibited Waste	11
Handling Suspected Hazardous Waste	11
Feedstock Quantities	11
Solid Waste Disposal	12
Water Management	12
Tank Level Controls	12
Chemical Storage	13
Spill Prevention and Response	14
Best Management Practices	14
Slurry/Leachate Spill Response (Poly Tanks, Processing Tanks, and Equipment)	15
Tanker Truck Spill Response (in Exterior Dock Area)	16
Washbay Area Spill Response	17
All Other Substances Spill Response	18
Slug Discharge Notification Procedure	18
Record Keeping, Reporting and Quality Control	18
Disposal and recycling data collection	18
Inspection of Records	19
Reporting	19
Fire Prevention	19
Odor & Nuisance Management	20
Litter Prevention:	20
Vector Prevention and Control	20
Dust, Odor, and Noise Control	20
Cleanliness	21
Maintenance	21
Complaints	21

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Employee Training	22
PPE	22
Safety	22
Site Figures	23
Appendix A - Flow diagram	25
Appendix B - Loaded Dry Van Inspection Process	26
Introduction	26
Table of Contents	26
Personal Safety Hazards	26
Other Notes	26
Operations Cleaning and Inspection	27
Driver Empty Trailer Pre-trip Inspection	27
Driver Loaded Trailer Pre-trip Inspection	27
Post-Trip Inspection/ Spill Kits	27

FACILITY OPERATIONS

Operating Hours

The Plymouth Processing Facility operates and receives material 24 hours per day, 7 days per week.

Access Roads and Parking

The property is located in the southeast quadrant of the Pioneer Road and Jim Neu Drive intersection, on the east side of Pioneer Drive and south side of Jim Neu Drive. The Facility's entrance is via Jim Neu Drive, and the parking lot area is separated from the dock trailer yard. The parking area has roughly 50 available spots for Divert employees and visitors. There will be a gravel lot on the south side of the property to extend part of the trailer yard for temporary trailer parking.

Material Management

In conjunction with the safety protocols, the Facility Manager is responsible for the training, implementation, and maintenance of all SOPs regarding the management of unsold food material. SOPs for material management include:

- Bin Assembly
- Forklift Operations
- Material Receiving & Truck Docking
- Inbound Material Inspection
- Hazardous Waste Identification and Handling
- Material Processing
- Outgoing Material
- Wash-down Water Management

Slurry Tankers

The facility will operate 24/7 processing material. The slurry tankers onsite will be parked on a flat paved area in the exterior dock and will be used for transportation of slurry to outlets. Tankers will not be held onsite containing material for longer than 24 hours. If in the case the facility does not have staff onsite for a given period, the slurry tanker will remain empty.

Load Checking Program

A screening program will be implemented at the facility to make sure that no unacceptable, non-compliant or otherwise hazardous material is processed. Load

operations management team must escalate the incident to the regional support team if not already done so. The operations staff will be closely monitoring tank levels through the shift and will act accordingly when tanks reach high and high-high levels to prevent potential tank spills.

Chemical Storage

The table below lists all the chemicals and products stored on site. The facility processes are completely enclosed within the building or sealed tanks (propane tanks). Safety Data Sheets (SDS) for each chemical listed can be made available upon request. Small quantities of additional maintenance chemicals are stored on-site. Maintenance related lubricants, paints, and cleaning chemicals will be stored on shelves, flammable cabinets, and/or placed atop adequately sized spill containment pallets in the maintenance area. The SDS for these additional chemicals are maintained on-site and available upon request. All stored material is compatible with the container.

Product Name	Use	Storage Volume (ga)	Container Size / Type
Slurry	Beneficial Use Product	40,000	4x Polyethylene Tanks (10,000-gal each)
Buffer Tank Slurry	Initial Recovered Product	4,950	Poly Tank
Mobile Gear 600 XP 460	Lubrication Oil	40	5-gal Buckets
Chemstation 5032	Bin Cleaning	800	2x 400-gal Poly Tanks** 120-gal Dilution Tank (double walled)
Chemstation 50481	Wastewater Treatment	220	Poly Tank (double walled)
Chemstation 1050	Sanitizer	15	5-gal Buckets
Simple Green	Cleaning	10	5-gal pail
Various Lubricants, Paints, Cleaners, Oils, Truck Mxn	General Maintenance	<40	Varied, <5-gallon container in flammables cabinet
Used Oil	Stored for Disposal	275	55 gal drums

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<u>Ice Melt</u>	<u>Snow/Ice</u>	<u>Pallet</u>	<u>50-lb bags</u>
<u>Water Softener Salt</u>	<u>Water Softening</u>	<u>Pallet</u>	<u>40-lb bags</u>
<u>Propane</u>	<u>Fuel</u>	<u>264</u>	<u>22-lb tanks (stored in cage)</u>

****chemicals will be stored atop adequately sized secondary spill containment.**

Spill Prevention and Response

The below procedures describe the general spill measures and best management practices taken to prevent spills. Please refer to the detailed site Spill Response Plan, which is maintained on-site and is available upon request.

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Best Management Practices

- Initial and annual training on spill prevention and response, good housekeeping, and material management practices is conducted for all employees.
- Routine inspection of interior and exterior of the facility.
- Divert logistics drivers will perform pre-departure inspections of loads from the customer distribution centers. Verifying the trailer integrity and leachate leakage prior to departure will reduce any leaking while in transit.
- All end dump trailers with residuals will be housed inside the facility and the dry van trailers with incoming food waste materials will be staged within the loading dock doors. Staging of full trailers can only occur outside in the gravel lot intermittently for ideally less than 6 hours.
- Spill containment and cleaning materials stored onsite, including loose absorbent material, absorbent socks and pads, drums for disposal of material as appropriate, shovels, squeegees, and corresponding PPE are located in the maintenance shop, dock area, wastewater treatment tank, and waste disposal areas.
- Labeling containers and keeping containers stored properly.
- Empty open-top containers shall not be stored outside without being properly protected from exposure to rain.

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- All machinery and equipment storage or maintenance activities performed near drains or outside a building roof are managed in such a way as to avoid spills into floor drains or onto the ground.
- All spills are properly contained on-site, cleaned-up and properly disposed according to appropriate regulations governing the spilled materials.
- Material storage containers, tanks, and drums shall be checked for signs of deterioration and leakage.
 - All secondary containment pallets and oil storage containers are inspected at least monthly.
- All oil shall be kept in compatible containers. Fiber drums shall not be used to store oil.
- This plan will be reviewed after any spill event or at a minimum annually.

Slug Discharge Notification Procedure

If there is an unpermitted discharge entering the sanitary sewer, storm sewer or other offsite receptors, notifications to the appropriate municipality and/or IDEM shall be made as required.

1. Immediately escalate to Plant Manager or designated lead personnel.
2. Report the spill event to Divert EHS once the area is stabilized.
3. Divert Leadership will make any applicable notification to the appropriate municipality or regulatory agency if material enters the sanitary or stormwater sewers, or other offsite receptors.

Plant Manager to conduct event investigation, root cause analysis and develop measures to prevent recurrence.

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Record Keeping, Reporting and Quality Control

Disposal and recycling data collection

- **Solid waste received** - The facility collects information on a monthly basis of the number of tons or cubic yards of solid waste received for processing.
- **Solid waste disposal** – The facility collects information on a monthly basis of the number of tons or cubic yards of solid waste transported to landfill or other IDEM-permitted disposal site.
- **Recycling** – The facility collects information about the amount of each material recovered for anaerobic digestion, composting, recycling or other beneficial purpose for each year.

To maintain quality of incoming unsold food, outgoing liquid slurry, and the transportation/handling of these materials, Divert implements the following practices for record keeping and testing:

- Incoming Material
 - Daily volume tracking
 - Bin inspection
 - Bill of lading for incoming dry van trailers
- Outgoing Liquid Slurry
 - Daily volume tracking
 - Monitoring of liquid volume in holding tanks
 - Bill of lading for outgoing tanker trailers
- Residuals
 - Daily volume tracking
 - Bill of lading for outgoing end-dump trailers

Inspection of Records

Facility records will be maintained in the facility office and are available for inspection by IDEM staff or other duly authorized agencies pursuant to the Permit. Records may also be requested by contacting the Site Manager between the hours of 9 a.m. and 5 p.m. Monday through Friday.

Reporting

The reporting requirement will depend on conditions listed on the facility's solid waste processing permit. Sampling for microplastics is completed monthly, submitted within 30 days, and records are maintained for 3 years. On a quarterly basis, tonnage waste reports are submitted using the Re-Trac portal system and due by the 15th of the first month after the end of the quarter.

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Fire Prevention

Fire extinguishers are located throughout the facility and team members are trained on the emergency response procedures as outlined in the facility's emergency response plan. Flammable materials are stored in a flammable cabinet and combustible materials are stored in a manner to protect them from sources of ignition.

Odor & Nuisance Management

Litter Prevention:

Incoming trucks to the site are enclosed vans. Outgoing, loose loads, are covered. Trailer cover verification is part of the truck check-out procedure, and the requirement is included in the contract for hauling.

Operations personnel are required to keep all areas within the site, and all vehicle access roads approaching the site to be free of litter and debris generated as a result of the facility's operation. Regular litter patrols and facility audits are conducted for this purpose.

Vector Prevention and Control

Vectors, such as flies, rodents, and birds, are minimized by processing all material within the building, implementing good housekeeping procedures, and expediting the reloading and shipment of incoming organic materials. The amount of time material is on-site is minimal and is typically no longer than 48 hours. A contract is maintained with a pest control company to assist with pest and odors. All measures are taken to control conditions which might attract and encourage vectors

Dust, Odor, and Noise Control

Numerous procedures and processes for nuisance control are implemented at the facility in order to minimize potential nuisance conditions. The facility is located in an industrially zoned area, and all processes will be performed within the building. Noises generated by operations at the facility are consistent with normal industrial noise levels at the various operating facilities in the area. All equipment has appropriate mufflers and other noise reducing mechanisms.

Odors are mitigated by the implementation of good housekeeping measures and an odor control system installed by the pest control company. The reloading and shipment of incoming and outgoing material will be expedited to ensure that materials are not stored onsite longer than necessary. Forklifts used to load and

unload bins will be washed at least once per week. Facility floors will be cleaned daily using a ride-on floor scrubber to prevent any residual odors. Odor monitoring will be conducted by trained staff members as needed to evaluate the effectiveness of these practices. The odor monitoring will consist of traveling to designated locations on and offsite to determine whether or not a malodor is detected. Staff conducting the odor monitoring will record their findings in the log, and what types of odors to record (i.e. whether or not an odor was detected, and if an odor is detected, a descriptor of that odor). Any time odors are detected outside of the building, action will be taken immediately to locate and remove the offending organic material. Fugitive dust emissions would be controlled by using water to mist roads as necessary.

Cleanliness

The site is washed and cleaned daily, preventing the build-up of residual material, odors, or vectors. It is the Facility Manager’s responsibility to inspect the site daily and ensure that the operators and maintenance crews maintain a sanitary facility. In addition, the front-end process equipment, building, and control room will be cleaned by hand to remove accumulated dirt and debris. The Facility Manager is responsible for generating and maintaining standard operating procedures (SOPs) for cleanliness, as well as properly training employees.

Divert is continuously improving their processes and daily operations to maintain a clean working environment and have no impact on the property or surrounding areas.

Maintenance

The operating team staff will be trained to maintain the Recovery Facility equipment. Divert maintains a team of maintenance and engineering specialists that provide training and staff to deal with processing equipment. The Divert staff will undergo training for custom pieces of equipment and will be involved in the identification of spare parts for inventory.

A preventative maintenance program for equipment will be implemented at the facility to ensure the reliability of all process and material handling equipment and the condition of the building, grounds, and other infrastructure. The facility management and maintenance team will monitor and inspect the facility floor for any cracks or breaks in the concrete or floor coating monthly. All inspections will be conducted regularly, recorded, and tracked through an internal maintenance portal. There will also be daily, weekly, monthly, and annual inspections performed by the regional support teams, Facility Manager, and the maintenance

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team. Equipment, building, grounds, and other infrastructure found to be in need of maintenance will be brought to the attention of the Facility Manager and corrected promptly.

Complaints

A record of all complaints regarding this facility will be maintained in a log along with the operator's actions taken to resolve these complaints, in accordance with the Permit.

Employee Training

Personnel are trained on the contents and requirements of this plan along with the facility SOPs applicable to their roles and responsibilities at the time of job assignment and annually thereafter. Training records are available for inspection.

PPE

Personal protective equipment (PPE) is to be provided, used, and maintained in sanitary and reliable conditions wherever applicable to reduce hazards from processes or the work environment. Employees are responsible and are expected to wear PPE when and where it is required. Personnel on the plant floor conducting general tasks are required to wear the following PPE: hard hat, steel toed boots, high-visibility vest, and safety glasses. There are specific work tasks that may require additional PPE, and these tasks are mainly for maintenance projects. PPE will be regularly cleaned, inspected, and stored according to the instructions given during training sessions or as directed by supervisors.

Safety

It is the responsibility of the Facility Manager to train employees, implement and maintain proper safety protocols, and perform weekly safety walkthroughs. Safety protocols include the following:

- Personal Protective Equipment (PPE)
 - Standard Facility PPE (required): High-Vis Vest, Steel-Toed Safety Shoes, Hard Hat, Safety Glasses
 - Facility Manager is responsible for inspecting the PPE on a daily basis while touring the facility and issuing new PPE as needed, or at the request of employees

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- Other Hazards
 - Forklift Operations
 - Chemical Safety
 - Personal Protective Equipment
 - Heavy Machinery/LOTO
 - Hot Work
 - Electrical Safety
- Injury & Incident Response
- Alerts & Alarms
- Emergency Equipment
- Assembly Area
- Emergency Procedures (Appended)
- Spill Prevention and Response Procedures
- Overview and review of Spills

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