

Appendix F: Complaint Response Plan



KING COUNTY DEPARTMENT OF NATURAL RESOURCES & PARKS
SOLID WASTE DIVISION

**CEDAR HILLS REGIONAL LANDFILL
COMPLAINT RESPONSE PLAN
(ODOR, FUGITIVE DUST, OR NUISANCE)**

PREPARED BY:

ENGINEERING SERVICES SECTION

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VOO/2000/COMPLAINT RESPONSE PLAN

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1. INTRODUCTION AND BACKGROUND

- 1.1 Purpose. The purpose of this plan is to document Odor, Fugitive Dust, or Nuisance Complaint Response Procedures adopted by the King County Solid Waste Division (KCSWD) for the Cedar Hills Regional Landfill (CHRLF)
- 1.2 Regulatory Requirements. Specific requirements are contained in the following documents:
- September 22, 1999 Notice of Construction (NOC) Number 7676 for the Area 4 Closure and Area 5 Development Landfill Gas (LFG) Collection Project. Condition Number 8 of the NOC requires the King County Solid Waste Division to develop a Complaint Response Plan.
 - May 16, 2002 Order of Approval to Construct, Install, or Establish the Area 5 Closure and Area 6 Development Landfill Gas (LFG) Collection Project. Condition Number 4 reiterates the continuance of the existing Dust Control Program as part of the Operations & Maintenance Plan.
 - An Operation and Maintenance Plan is required by Puget Sound Clean Air Agency Regulation I, Section 7.09.
 - Cedar Hills Regional Landfill Air Operating Permit No. 10138. Part II (b).
- 1.3 Definitions
- 1.3.1 **“Emergency Complaints”** means Complaints determined to be due to air quality that is continuing to degrade to a level that should not be reached, and that requires immediate control action(s) are necessary.
- 1.3.2 **“Landfill Gas Crew”** means the group of employees who are assigned the responsibility of operating, maintaining, and monitoring the landfill gas collection and treatment facilities at the Cedar Hills Regional Landfill as well as closed and custodial landfills.
- 1.3.3 **“Landfill Gas Operator”** means a regular, full-time employee who is assigned to the Landfill Gas Crew.

- 1.3.4 “**Permit Coordinator**” means the permanent, full-time employee designated by the Operations Manager or Division Director to be the point of contact for citizens with concerns about Cedar Hills Regional Landfill operations.
- 1.3.5 “**Monitoring**” means using the procedures outlined in the CHRLF, Landfill Gas Operations and Maintenance Manual (Appendix B, Section 4.2.3 – Air Operating Permit Implementation Plan) to evaluate the source of Landfill Gas (LFG) and the operational status of LFG control facilities.
- 1.3.6 “**Landfill Gas**” means gas generated by decomposition of refuse.
- 1.3.7 “**Landfill Gas/Wastewater/Landfill Supervisor**” means the permanent, full-time employee responsible for direct operation of the landfill, wastewater, and gas facilities.
- 1.3.8 “**Responsible Official**” means the Director of the Solid Waste Division or person (s) designated by the Responsible Official.

2. GUIDELINES

2.1 Hours of Response:

- 2.1.1 During normal working hours (8:00 a.m. to 4:30 p.m.), Cedar Hills staff will respond to and investigate complaints (296-4490) as soon as possible, but not later than 12 hours after receipt of the complaint.
- 2.1.2 After hours, weekends and holidays, the Cedar Hills main telephone number will be switched to the King County Department of Transportation (KCDOT) 24-hour help desk. The Help Desk will immediately notify *the supervisor on call* of all emergency complaints in accordance with the attached procedures.

2.2 Response to Complaints:

- 2.2.1 When Landfill Gas Crew is notified of a complaint, they will investigate the subject and nature of the complaint within 12 hours after receipt of the complaint

- 2.2.2 If it is determined that the odors or fugitive dust are being generated by activities at the Cedar Hills Regional Landfill, the Landfill Gas Operator(s) or others will investigate the sources in accordance with procedures outlined in this Complaint Response Plan.
- 2.2.3 A supervisor or designated representative and the Permit Coordinator will be notified of actions taken to mitigate the problem
- 2.2.4 All investigative actions will be documented.
- 2.2.5 The responsible Solid Waste Division staff shall record and investigate complaints regarding odor, fugitive dust, or nuisance as soon as possible, but not later than 12 hours after receipt of the complaint. Corrective measures will be taken on a case-by-case basis, but not later than 24 hours of each confirmed complaint, in general accordance with the procedures outlined in Section 4.2.3, Table 4-4 of the CHRLF Air Operating Permit Implementation Plan.

3. IMPLEMENTATION PROCEDURES

3.1 Odor Complaint Response Procedure

<u>Responsibility</u>	<u>Action</u>
Citizens	3.1.1 Call the Cedar Hills Main Telephone Number (206) 296-4490 to report odors, fugitive dust, or nuisance. Provide name, address, neighborhood, telephone number, time of day, odor, fugitive dust, or nuisance that was noticed, and description of odor, fugitive dust, or nuisance.
Receptionist and KCDOT 24-Hour Complaint Line	3.1.2 Completes a Complaint Form (See attached Sample Form) documenting citizen information, including name, address, neighborhood, telephone number, time of day incident was noticed, duration and description of odor, fugitive dust, or nuisance.

- 3.1.3 Give a written complaint form to the Permit Coordinator and a copy to the Landfill Gas/Wastewater/Landfill Supervisor and leave a message on voice mail.
 - 3.1.4 If the Permit Coordinator and the Gas/Wastewater/Landfill Supervisor is not immediately available, and the complaint is received during operating hours, contact the Supervisor-in-Charge to direct the investigation of the complaint.
- Permit Coordinator
- 3.1.5 Receives written complaint form and/or phone message that a citizen odor, fugitive dust, or nuisance complaint has been recorded.
 - 3.1.6 Contacts Gas/Wastewater/Landfill Supervisor to initiate investigative actions. In the absence of this Supervisor, Signs Forms and contacts the LFG Crew directly to investigate the complaint.
- Gas/Wastewater/Landfill Supervisor
- 3.1.7 Contacts LFG Crew to investigate the complaint and signs Form.
- Landfill Gas Operator
- 3.1.8 Attempts to identify the odor, fugitive dust, or nuisance and its origin.
 - 3.1.8.1 Receives Complaint Form and signs
 - 3.1.8.2 Checks the prevailing wind direction in relation to the area of complaint.
 - 3.1.8.2 Cross-checks with known landfill operations activities.
 - 3.1.8.3 Walks the area in question.
 - 3.1.8.4 Continuously checks for gas, fugitive dust, or nuisance in atmosphere as necessary, using monitoring equipment described in Section 4.2.3 of the CHRLF Air Operating Permit Implementation Plan.

- 3.1.8.5 Records levels of landfill gas (Methane) or extent of dust in atmosphere if present. Dust and Methane levels shall be measured in accordance with the procedures outlined in Sections 4.1.3 and 4.2.3 respectively, of the CHRLF Air Operating Permit Implementation Plan
- 3.1.8.6 If it is determined that odors, fugitive dust, or nuisances are being generated by Cedar Hills Landfill, checks for the origin.
- 3.1.8.7 The Landfill Operator will take appropriate corrective actions in accordance with the following adopted documents: Cedar Hills Landfill (LFG) O&M Manual, Dust Control Program, and the Site Operations and Maintenance Plan.
- 3.1.8.8 Summarizes results of the investigation on the Complaint Form, and signs Forms.
- 3.1.8.9 Notifies the Landfill Gas/Wastewater/Landfill Supervisor, the Permit Coordinator, and the duty supervisor of any actions taken to mitigate the problem. Gives them the completed Form.

Permit Coordinator

- 3.1.9 Receives reports of LFG Operator's investigation and responds to citizens, if requested.
- 3.1.10 Documents information or findings.

- 3.1.11 Keeps a copy of this Complaint Response Plan on site, and makes it available upon request to the Puget Sound Clean Air Agency (PSCAA) and other approved persons or agencies.
- 3.1.12 Prepares an Information Bulletin which, shall be mailed to any person who contacts the landfill, or to other interested persons forwarded from a local government agency. The Bulletin shall include an explanation of the landfill's odor and nuisance control plans, and the name and telephone number of the Solid Waste Division staff responsible for responding to landfill-related complaints.

4. RESPONSIBILITIES

- 4.1 The Division Director, as the Responsible Official, is responsible for compliance with the approved Complaint Response Plan. The Division Director delegates responsibility for the implementation of this Plan to the Landfill/Shops Operations Manager
- 4.2 Operations Manager is responsible for planning, directing, managing, coordinating, and supervising programs necessary for the execution of the Plan. Delegates' responsibility for communications regarding complaints to the Permit Coordinator or Community Involvement Coordinator. Delegate's responsibility for oversight of the gas collection and treatment, and fugitive dust control to the Landfill/Gas/ Wastewater Supervisor.
- 4.3 Permit Coordinator or Community Involvement Coordinator is responsible for receiving and doing follow-up on complaints.
- 4.4 Landfill Gas/Wastewater/Landfill Supervisor is responsible for oversight of the operation and maintenance of the landfill gas collection and treatment system, and the implementation of the dust control program.
- 4.5 Landfill Gas Crew is responsible for daily operation and maintenance of the landfill gas collection and treatment facilities.
- 4.6 The Operations Manager, or designee, is responsible for preparing the Information Bulletin.