

OHIO E.P.A.

SEP-6 2001

ENTERED DIRECTOR'S JOURNAL

Date Issued: SEP 6 2001

Date Effective: SEP 6 2001

**BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter Of:

Williams County Landfill, Inc. :  
12604 Country Road G  
Bryan, Ohio 43506

Director's Final Findings  
and Orders

Respondent

**PREAMBLE**

It is hereby agreed by and among the parties hereto as follows:

**1. JURISDICTION**

These Director's Final Findings and Orders ("Orders") are hereby issued to Williams County Landfill, Inc. ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under sections 3734.13 and 3745.01 of the Ohio Revised Code ("ORC").

**II. PARTIES**

These Orders shall apply to and be binding upon the Respondent, and its assigns and successors in interest. No changes in ownership relating to the Respondent's Facility will in any way alter the Respondent's responsibilities under these Orders. The Respondent's obligations under these Orders may be altered only by the written approval of the Director of Ohio EPA.

**III. DEFINITIONS**

Unless otherwise stated, all terms used in these Orders shall have the same meaning as used in ORC Chapter 3734 and the regulations promulgated thereunder.

*I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.*

*Zena L. Clement* 9-6-01

#### **IV. FINDINGS OF FACT**

The Director has determined the following findings of fact:

1. Respondent is the owner, operator, and license holder of the Williams County Landfill ("Facility") located at 12604 Country Road G, Bryan, Williams County, Ohio.
2. The Facility is a "sanitary landfill facility" as defined under Ohio Administrative Code (OAC) Rule 3745-27-01 (C)(4) and is authorized to accept "solid waste" as that term is defined under ORC Section 3734.01 (E) and OAC Rule 3745-27-01 (B)(43).
3. On April 5, 1995, Ohio EPA issued Permit-to-Install No. 03-6551 ("PTI") authorizing the construction of the Facility. The PTI was originally issued to the Facility while it was owned by Laidlaw Waste Systems, Inc., the parent company of the Respondent. Subsequently, Allied Waste acquired Laidlaw Waste Systems, Inc. and its subsidiary, Williams County Landfill, Inc.
4. In correspondence dated March 28, 1996, July 23, 1996, January 31, 1997, January 12, 1998, March 27, 1998, June 7, 2001 and June 28, 2001 the Williams County Health Department collectively notified Respondent of the following violations of OAC Rule 3745-27-19:
  - a. Respondent violated OAC Rule 3745-27-19(E)(5) by failing to collect, contain and dispose of scattered litter.
  - b. Respondent violated OAC Rule 3745-27-19(E)(26) by failing to maintain the integrity of the engineered components and repair any damaged components.
  - c. Respondent violated OAC Rule 3745-27-19(F) by failing to: 1) apply a minimum of 6 inches of daily cover to all exposed solid waste at the end of each working day; 2) cover placed solid waste within 24 hours of disposal; and 3) ensure that cover soil is non-putrescible, not composed of solid waste and does not contain large objects which will interfere with its intended purpose.
  - d. Respondent violated OAC Rule 3745-27-19(G)(1) by failing to apply an intermediate cover of at least 12 inches in thickness to all filled areas of the Facility where additional solid waste is not to be deposited for at least 30 days.

- e. Respondent violated OAC Rule 3745-27-19(G)(4) by failing to perform measures to protect the intermediate cover from erosion when the intermediate cover is exposed or will be exposed for more than 180 days.
  - f. Respondent violated OAC Rule 3745-27-19(J)(4) by failing to undertake actions as necessary to correct conditions causing ponding or erosion.
  - g. Respondent violated OAC Rules 3745-27-19(K)(1)(a) and (c) by failing to 1) contain and properly manage the leachate and 2) take action to minimize, control or eliminate the conditions which contribute to the production of leachate.
5. In correspondence dated May 29, 1996, May 16, 1997, February 25, 1998, March 12, 1999, August 19, 1999, September 17, 1999, December 16, 1999, June 14, 2000 and August, 7, 2000, Ohio EPA collectively notified Respondent of the following violations of OAC Rule 3745-27-19:
- a. Respondent violated OAC Rule 3745-27-19(C) by: 1) failing to submit a PTI modification prior to the installation of the northwest leachate tank; 2) overfilling on the north and east slopes; 3) using soils for construction before the required seven day notice; and 4) for allowing waste to be placed out-of-bounds in Cell 1.
  - b. Respondent violated OAC Rule 3745-27-19(E)(5) by failing to collect, contain and dispose of scattered litter.
  - c. Respondent violated OAC Rule 3745-27-19(E)(12) by failing to complete all of the required entries in the Facility's daily log of operations.
  - d. Respondent violated OAC Rule 3745-27-19(E)(26) by failing to maintain the integrity of the engineered components and repair any damaged components.
  - e. Respondent violated OAC Rule 3745-27-19(E)(27)(b) by failing to submit the construction certification report for the north slope capping activities into the operating record as required by OAC Rule 3745-27-09.
  - f. Respondent violated OAC Rule 3745-27-19(F) by failing to: 1) apply a minimum of 6 inches of daily cover to all exposed solid waste at the end of each working day; 2) cover placed solid waste within 24 hours of disposal; and 3) ensure that cover soil is non-putrescible, not composed of solid waste and does not contain large objects which will interfere with its intended purpose.

- g. Respondent violated OAC Rule 3745-27-19(G)(1) by failing to apply an intermediate cover of at least 12 inches in thickness to all filled areas of the Facility where additional solid waste is not to be deposited for at least 30 days.
  - h. Respondent violated OAC Rule 3745-27-19(J)(4) by failing to undertake actions as necessary to correct conditions causing ponding or erosion.
  - i. Respondent violated OAC Rules 3745-27-19(K)(1)(a) and (c) by failing to 1) contain and properly manage the leachate and 2) take action to minimize, control or eliminate the conditions which contribute to the production of leachate.
  - j. Respondent violated OAC Rule 3745-27-19(K)(4) by failing to obtain authorization from the Director of Ohio EPA to store leachate within the limits of waste placement.
6. In correspondence dated March 10 1997, May 7, 1997, June 9, 1997, March 27, 1998, October 15, 1998 and December 22, 1999 Ohio EPA collectively notified Respondent of the following violations of OAC Rule 3745-27-12:
- a. Respondent violated OAC Rule 3745-27-12(E) by placing waste within 200 feet of an occupied structure without installing a permanent gas probe.
  - b. Respondent violated OAC Rule 3745-27-12(F) because the contents of its explosive gas monitoring plan was not understood by the Facility's monitoring personnel.
  - c. Respondent violated OAC Rule 3745-27-12(I) because the monthly explosive gas monitoring results were submitted beyond the fifteen day requirement.
7. In correspondence dated July 23,1998, December 22,1998, December 23,1998, April 19, 1999, July 2, 1999, July 21, 1999, September 14, 1999, November 18, 1999, December 22, 1999, June 29, 2000, August 2, 2000, August 16, 2000, November 2, 2000, December 15, 2000, December 19, 2000 and March 13, 2001 Ohio EPA notified Respondent of violations of OAC Rules 3745-27-10(A) and (C) for failure to follow the Facility's Ground Water Detection Monitoring Plan.

Specifically, Respondent has violated OAC Rules 3745-27-10(A) and (C) by 1) failing to follow sample collection procedures; 2) failing to list the sample matrix; 3) failing to complete the "Inspection" section of the filed data sheets; 4) failing to complete the "Well/sample identification" section of the field data sheets; 5) failing

to conduct the analysis in accordance with the practical quantification limit (PQL); and 6) failing to analyze samples within the required holding time.

8. In correspondence dated March 27, 1998, Ohio EPA notified Respondent of a violation of OAC Rule 3745-27-09(D)(1) because the Facility's explosive gas monitoring plan did not comply with the applicable regulations.
9. Respondent has violated Condition No. 2 of the Facility's approved April 5, 1995 PTI by accepting waste in excess of its Authorized Maximum Daily Waste Receipt ("AMDWR"). The Williams County Health Department and Ohio EPA notified the Respondent of this violation through correspondence dated July 7, 1999. Based upon the Respondent's waste receipts, Ohio EPA has found that the Facility accepted approximately 231 tons of solid waste in excess of its AMDWR on June 23, 1999, and 195 tons of solid waste in excess of its AMDWR on June 24, 1999. Respondent's failure to comply with Condition No. 2 of the Facility's approved April 5, 1995 PTI is also a violation of ORC Sections 3734.11 (A) and 3734.11 (B) and OAC Rule 3745-27-19(C).
10. Respondent has violated the Facility's approved April 5, 1995 PTI by placing approximately 8,000 cubic yards of waste in excess of the Facility's vertical waste placement limits. Ohio EPA notified the Respondent of this violation through correspondence dated June 14, 2000. Respondent's failure to comply with the Facility's approved April 5, 1995 PTI is a violation of ORC Sections 3734.11 (A), 3734.11(B) and OAC Rule 3745-27-19(C). Subsequent Ohio EPA inspections revealed that the Respondent corrected this overfilling violation.

#### V. ORDERS

The Respondent shall achieve compliance with ORC Chapter 3734 and the regulations promulgated thereunder according to the following compliance schedule:

##### Employee Training

1. Within forty five (45) days after the effective date of these Orders, the Respondent shall provide training to its employees regarding the terms and conditions of the Facility's approved detail plans, specifications, the approved April 5, 1995 PTI and any other applicable authorizing documents.
2. Within ninety (90) days after the effective date of these Orders, the Respondent shall provide training to all employees of the Facility as detailed in Attachment A, attached hereto and incorporated herein.

3. Within one hundred five (105) days after the effective date of these Orders, the Respondent shall provide documentation to Ohio EPA certifying that all operations at the Facility are performed by individuals who have been trained in the proper operating procedures, the terms and conditions of the Facility's authorizing documents and with the requirements of OAC Rule 3745-27-19. The certification shall be signed by a responsible official of the Respondent.

#### Leachate Management

4. Effective immediately, the Respondent shall conduct daily inspections and shall document the results of each inspection in the Facility's daily log of operations. Upon discovery of any leachate outbreak, Respondent shall repair such outbreaks in accordance with OAC Rule 3745-27-19(K)(1)(a)-(c). Respondent shall further record in the Facility's daily log of operations, the location of the repaired leachate outbreak and the manner in which such repair has been remedied.
5. Within sixty (60) days after the effective date of these Orders, the Respondent shall submit to Ohio EPA for review and approval, a Facility Alteration Request for an updated leachate collection device(s) designed to replace the existing Modu Tank located on the northwest side. Respondent shall also include a Modu Tank decommissioning schedule and decommissioning plan as a component of the submittal required pursuant to this Order.
6. Within one hundred eighty (180) days after Ohio EPA approval of the Respondent's Facility Alteration Request, the Respondent shall complete construction of the leachate collection system components identified in Order No. 5 above in accordance with all applicable state and federal laws.

#### Surface Water Management

7. Within sixty (60) days after the effective date of these Orders, the Respondent shall submit to Ohio EPA for review and approval, a Facility Alteration Request which includes a Surface Water Management Plan meeting the requirements of OAC Rule 3745-27-19(J). Respondent's Facility Alteration Request shall also include an engineering plan sheet detailing the manner in which surface water will be managed at the Facility. Upon Ohio EPA approval, the Facility shall implement its approved Surface Water Management Plan as per the approved Facility Alteration Request.

#### Scattered Litter Control

8. Effective immediately, Respondent shall control scattered litter by utilizing temporary and/or permanent litter fences above the elevation of the working face.

9. Effective immediately, Respondent shall conduct daily inspections and shall document the results of each inspection on the Facility's daily log of operations. Upon discovery of any litter control failure, Respondent shall repair such litter controls and restore them to their proper use. Respondent shall further record in the Facility's daily log of operations, the location of the repaired litter control and the manner in which such repair has been remedied.

#### Daily Cover

10. Effective immediately, Respondent shall apply daily cover to all exposed solid waste by the end of the working day in accordance with OAC Rule 3745-27-19(F).
11. Effective immediately, Respondent shall maintain a stock pile of daily cover material located near the working face. Respondent shall monitor the daily cover material stock pile during its daily inspections and shall record in the Facility's daily operation log the adequacy of the amount of the stock piled daily cover material.

#### Intermediate Cover

12. Effective immediately, Respondent shall apply twelve inches of intermediate cover to all areas of the Facility where solid waste will not be deposited for at least thirty days and shall undertake all appropriate measures to protect the intermediate cover from erosion in areas which will be exposed for greater than one hundred and eighty days in accordance with OAC Rule 3745-27-19(G).

#### Facility Oversight

13. Effective thirty (30) days after the effective date of these Orders and continuing monthly thereafter, Respondent shall provide a corporate compliance officer, or their qualified representative, and a professional skilled in the appropriate discipline(s) to supervise all operational and engineering activities as outlined in OAC Rules 3745-27-19. The corporate compliance officer and the professional skilled in the appropriate discipline(s) shall document their presence in the Facility's daily log of operations.

#### Documentation

14. Beginning with the 15th day of the first month after the effective date of these Orders and continuing on the 15th day of each month thereafter, Respondent shall submit a monthly report to Ohio EPA which summarizes the following:
  - A. Activities undertaken by the Respondent to satisfy the requirements of these Orders;

- B. Leachate generation summary report that includes:
    - 1. Each date of leachate pumping;
    - 2. Leachate pumping locations;
    - 3. Volume of leachate pumped at each location;
    - 4. Total volume of leachate pumped;
    - 5. Final disposal facility for leachate.
  - C. Key events noted in the daily log during the previous month. For purposes of these Orders, key events shall include but not be limited to, repair of leachate outbreaks, leachate spills/tank leaks, erosion repairs, or any other unforeseen circumstance which requires attention.
17. In settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 3734., Respondent shall perform the following Supplemental Environmental Projects (SEPs) which total \$60,000 according to each schedule contained herein:

- A. Within 60 days after the effective date of these Orders, Respondent shall arrange for, fund, remove, transport and dispose of or beneficially use all scrap tires located at the Penny Perez Property, 18304 State Route 20A, West Unity, in Williams County, Ohio. All activities required by this Order shall be conducted in accordance with all applicable state and federal laws.

Respondents may credit actual eligible expenses toward the total SEP value identified in Order 17. Such actual eligible expenses shall not exceed the following:

- 1. Tire shredding rate up to \$0.90 per tire;
- 2. 3 trucks for transportation up to \$58.00 per hour for a maximum of 10 hours per day for maximum of 2 days;
- 3. 1 tire loader up to \$750.00 per day for maximum of 2 days;
- 4. 1 excavator rental fee up to \$1695;
- 5. Disposal of up to 20 tons of rims and other solid waste-not composed of tires encountered as a result of complying with Order 17.A. at a maximum disposal rate of \$43.75 per ton.

Within 70 days after the effective date of these Orders, Respondent shall provide to Ohio EPA Legal, Attn: Solid Waste Legal Supervisor, P.O. Box 1049, Columbus, Ohio 43216-1049 documentation which itemizes each of these actual eligible expenses and tire disposal records.

- B. Within 90 days after the effective date of these Orders, Respondent shall pay the difference between \$60,000 and the itemized actual eligible costs

incurred as a result of performing Order 17. A. Respondents shall pay this difference to the County Line Landfill Closure Trust Fund, (Account Number 8100), established on December 1, 1995 by and between the John B. Stahl, Executor of the Estate of Henry G. Stahl, the Croghan Colonial Bank, and Ohio EPA. Payment to Account Number 8100 shall be mailed and addressed to:

Croghan Colonial Bank Trustee  
FBO Henry G. Stahl  
323 Croghan Street  
Fremont, Ohio 43420

On or before November 9, 2001, Respondent shall submit a copy of the trust deposit to Ohio EPA Legal, Attn: Solid Waste Legal Supervisor, P.O. Box 1049, Columbus, Ohio 43216-1049.

#### **VI. TERMINATION AND SATISFACTION**

The Respondent's obligations under these Orders shall terminate when the Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA, Division-of Solid and Infectious Waste Management, that all obligations under these Orders have been performed and Ohio EPA, Division of Solid and Infectious Waste Management, acknowledges, in writing, Ohio EPA's acceptance of this certification and demonstration.

This certification shall be submitted by the Respondent and shall be signed by a responsible official of Williams County Landfill, Inc. The certification shall make the following attestation: "I certify to the best of my knowledge, that the information contained in or accompanying this certification is true, accurate and complete."

For purposes of these Orders, a responsible official is a corporate officer who is in charge of a principal business function of Williams County Landfill, Inc.

#### **VII. OTHER CLAIMS**

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a signatory to these Orders, for any liability arising out of or relating to the operation of the Respondent's Facility.

#### **VIII. OTHER APPLICABLE LAWS**

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable federal, state, and local laws and

regulations. Nothing in these Orders shall be construed as waiving or compromising in any way the applicability and enforcement of any other statutes or regulations applicable to the Respondents operation of its Facility. Ohio EPA reserves all rights and privileges except as specified herein.

#### IX. NOTICE

All documents demonstrating compliance with these Orders and all other documents required under these Orders to be submitted to Ohio EPA and shall be considered to be effective as of the date of the postmark evidencing the mailing of the document to Ohio EPA pursuant to first class mail, postage prepaid and addressed to:

Ohio Environmental Protection Agency  
NWDO District Office  
Division of Solid and Infectious Waste Management  
Attn: Unit Supervisor, DSIWM  
347 North Dunbridge Road  
Bowling Green, OH 43402

and

Williams County Health Department  
Attn: Health Commissioner  
310 Lincoln Avenue  
PO Box 146  
Montpelier, OH 43543

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

#### X. RESERVATION OF RIGHTS

Nothing contained herein shall be construed to prevent Ohio EPA from seeking legal or equitable relief to enforce the terms of these Orders or from taking other administrative, legal or equitable action as deemed appropriate and necessary, including penalties against the Respondent for noncompliance with these Orders.

Nothing contained herein shall be construed to prevent Ohio EPA from exercising its lawful authority to require the Respondent to perform additional activities pursuant to ORC Chapter 3734 or any other applicable law in the future,. Nothing herein shall restrict the right of the Respondent to raise any administrative, legal or equitable claim or defense with respect to such further actions which Ohio EPA may seek to require of the Respondent.

Nothing in these Orders shall be construed to limit the authority of Ohio EPA to seek relief for violations not addressed in these Orders.

### **XI. WAIVER**

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for all past violations addressed in these Orders, the Respondent agrees that these Orders are lawful and reasonable, that the items and time frames provided for compliance herein are reasonable and that the Respondent agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for the Respondent's liability for all past violations of the regulatory provisions cited herein.

The Respondent hereby waives the right to appeal the issuance, terms and service of these Orders, and the Respondent hereby waives any and all rights it may have to seek administrative or judicial review of these Orders either in law or equity.

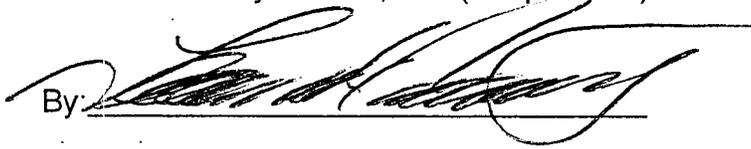
Notwithstanding the preceding, Ohio EPA and the Respondent agree that in the event that these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, the Respondent retains the right to intervene and participate in such appeal. In such an event, the Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated, or modified.

**XII. SIGNATORIES**

Each undersigned representative of a signatory to these Orders certifies that he or she is fully authorized to enter into the terms and conditions of these Orders and to legally bind such signatory to this document.

**IT IS SO AGREED:**

Williams County Landfill, Inc. (Respondent)

By: \_\_\_\_\_

August 27, 2001  
Date

Title: VICE-PRESIDENT

Ohio Environmental Protection Agency

\_\_\_\_\_  
Christopher Jones, Director

## ATTACHMENT A

### WILLIAMS COUNTY SANITARY LANDFILL OPERATIONS WORKSHOP

#### PURPOSE:

This outline is intended to be used as a guide to provide personnel employed by Williams County Landfill, Inc. at the Williams County Sanitary Landfill (Facility) with a working knowledge of the current rules for operation of a municipal solid waste disposal facility currently authorized by the Ohio EPA.

Attendees of this program will be exposed to both classroom and field related conditions. For supervisory personnel, a minimum of sixteen (16) hours is anticipated to complete this program. For non-supervisory personnel, a minimum of eight (8) hours is anticipated to complete this program. For non-supervisory personnel, the program outlined below will be tailored to their applicable needs and/or job duties. Completion of this training program shall be noted in each individual's company personnel file.

#### PROPOSED TRAINING PROGRAM OUTLINE:

- I. Regulations.
  - A. Provide a review of the current solid waste definitions as used in Chapters 3745-27 and 3745-37 of the Ohio Administrative Code.
    1. Discuss solid waste definitions, including:
      - a. Hazardous Waste;
      - b. Infectious Waste;
      - c. Solid Waste, municipal solid waste;
      - d. Leachate;
      - e. General Phasing, a phase;
      - f. Ground Water Aquifer System;
      - g. Authorized Maximum Daily Waste Receipts (AMDWR);
      - h. Water Pollution;
      - i. Waters of the State;
      - j. Surface Water;
      - k. Salvaging;
      - l. Limits of waste placement;
      - m. Vertical expansion;
      - n. Working face;
      - o. Lower explosive limit (LEL),.

2. Discuss other types of wastes, including:
  - a. Clean hard fill;
  - b. 'Woody wastes/trees and brush/yard waste;
  - c. Asbestos materials;
  - d. Petroleum contaminated soils;
  - e. Fly ash/foundry sands;
  - f. Railroad ties and utility poles;
  - g. Construction and demolition debris;
  - h. Residual waste;
  - i. Industrial waste.

B. Operating Regulations

1. Overview of Operational regulations [3745-27-19];
2. Daily Inspections and Maintaining Daily Logs [3745-27-19(E)(12)];
3. Scattered Litter Control [3745-27-19(E)(5)];
4. Leachate Management [3745-27-19(K)];
5. Surface Water Management [3745-27-19(J)];
6. Applicable Authorizing Documents [3745-27-19(C)]
7. Noise and Dust Control [3745-27-19(E)(6)];
8. Maintain Engineered Components [3745-27-19(E)(26)];
9. Daily and Intermediate Cover [3745-27-19(F) & (G)];
- IO. Final Cover [3745-27-19(H)].

II. Records

A. Provide an overview of the Facility's records location and housekeeping.

1. Location of daily logs (completed and blank);
2. Location of Authorizing Documents;
  - a. Permit To Install;
  - b. Applicable Exemptions;
  - c. Daily log summary sheets;

- d. Explosive Gas Monitoring Plan;
  - e. Operating License;
  - f. Approved Plan Drawings;
  - g. Ground Water Detection Monitoring Plan;
  - h. NPDES Permit.
- 3. Posting of regulations at facility entrance;
  - 4. Location of complete OAC 3745-27.

### III. Facility Requirements.

- A. Provide guidance and describe procedures to be utilized by personnel responsible for day-to-day management.
  - 1. Explain Facility's pre-acceptance waste screening program in lieu of the incoming load inspections;
  - 2. Discussion of waste placement;
    - a. Horizontal;
    - b. Vertical;
    - c. Phasing.
  - 3. Operation of working face;
    - a. Direction;
    - b. Construction sequence;
    - c. Compaction and sloping of working face;
    - d. Clipping prohibition;
    - e. Using alternative daily cover;
    - f. Removing previous day's soil cover.
  - 4. Surface water management;
    - a. Proper grading techniques;
    - b. Diversion channels/berms;
    - c. Erosion control;
    - d. Storm water pollution prevention plan;
    - e. NPDES permit.
  - 5. Phasing;
  - 6. Inclement weather operations;

7. Fugitive dust;
  - a. Review air permit conditions;
  - b. Road maintenance;
  - c. Fly ash.
  
8. Groundwater monitoring per Facility's Ground Water Detection Monitoring Plan;
  - a. Sampling and testing procedures;
  - b. Testing frequencies;
  - c. Well construction/maintenance.
  
9. Explosive gas monitoring per facility's explosive gas monitoring plan;
  - a. Sampling and testing procedures;
  - b. Testing frequencies;
  - c. Well construction/maintenance;
  - d. Contingency plan.
  
10. Fire control.
  - a. Current policies.