

Exhibit 28

Highway Department Vehicle and Garage Operation and Maintenance Procedures

General Information:

- The Town of North Greenbush has approximately 55 vehicles in its vehicle fleet including the Highway Department, Utility Department, Building Department and Police Department.
- All fluid change work is performed in the Highway Garage by the Highway Department mechanics or at third-party licensed facilities, if required.
- Each vehicle is given oil changes approximately every 5,000 miles.
- Used vehicle oil is drained into mobile waste oil reservoirs and transferred to a 275-gallon main waste oil tank located in a steel secondary containment well.
- One spill kit is located in the mechanic's area in the garage to contain small spills per the adopted Spill Response Procedures.

Wastewater Disposal and Treatment from Vehicle Washing:

- All Highway Department vehicles are washed at the Highway Garage, which has a floor drain with silt collection chamber (cleaned out by a third-party contractor as needed) before discharging to a sewer line.
- Vehicle washing is done in areas designed to collect and hold the wash and rinse water or effluent generated.
- Floor drain silt is removed by vacuum truck as needed.

Site Drainage System Maintenance and Cleanout:

- Catch basins are pumped out regularly or before they are fully filled.
- External drains are examined yearly or more often to make sure that no oils, solvents or other hazardous materials leave the Highway Garage area.

Recycling (including Oil and Antifreeze):

- Used fluids are promptly transferred to used waste oil tanks or hazardous waste containers for recycling and/or disposal pick-up.

Hazardous Materials Storage:

- All hazardous materials shall be stored inside, under cover or protective tarp, or in an appropriate bulk tank.
- Aisle space should be wide enough to allow access for inspections and to ease material transport.
- Materials should be stored away from high-traffic areas to reduce the likelihood of accidents that may cause spills or damage to drums, bags or containers.
- Containers should be stacked according to manufacturer's directions to avoid damaging the container or product itself.
- Identify all hazardous and non-hazardous substances present in a facility. Compile a list of all chemicals present in a facility and obtain a Safety Data Sheet (SDS) for each one.

Spill Prevention and Response (Petroleum and Other Substances):

- All liquid cleaning is to be performed at a centralized station within the Highway Garage to ensure that solvents and residues stay in one place.
- Locate drip pans and draining boards to direct solvents back into solvent sink or holding tank for reuse.
- Promptly transfer used fluids to recycling waste oil tank or hazardous waste containers.
- Conduct maintenance work such as fluid changes indoors at designated locations.
- Parked vehicles shall be monitored closely for leaks, and pans placed under any leaks to collect fluids for proper disposal or recycling.
- Batteries are not stored.
- Use speedy-dry and not water as possible to clean spills, leaks and drips.
- Rags should be used to clean up small spills, dry absorbent materials for large spills, and a mop for general cleanup. Mop water can be disposed of via the sink or toilet to the sewer.
- Other incidental leaks are collected in the garage floor drain which leads to an oil separator which is cleaned every 6 months by an outside contractor.

Solid Waste Disposal:

- Solid waste is kept in appropriate garbage bins and barrels and disposed of in appropriate facilities.

Alternative Product Usage:

- Use non-hazardous cleaners when possible.
- Bio-degradable soaps are used for vehicle washing.
- Recycled products such as engines, oil, transmission fluid, antifreeze, and hydraulic fluid can be purchased to support the market of recycled products.

Responsibility:

- Highway Superintendent