

EXHIBIT 54

DOCUMENTATION for BEST MANAGEMENT PRACTICES (BMPS) FOR SNOW AND ICE REMOVAL

Salt Storage
Document) How salt is stored Minimum requirements are:) Indoors) Impervious pad) Runoff containment) Good housekeeping
Pre-Wetting
Document:) Application rate (gallons of brine per ton of road salt)) Composition of brine) % and amount of salt used that was pre-wetted 1. Per event 2. Per season) List Pre-wetting/brine-making equipment
Anti-Icing
Document:) Dates/events where anti-icing was used;) Composition of brine') Application rate;) Conditions present which warranted anti-icing.) List liquid storage facilities;) List trucks capable of direct liquid application;) Weather forecasting tool used.
Application
Document:) Materials (NaCl; MgCl, etc.) used for each snow event;) Mechanical removal is used prior to salt application; if not, why.) Methods used to reduce bounce and scatter of salt.
Variable Application Rates
Document:) Application rate(s) used for each storm;) Justification for application rate(s) used (conditions present which warranted rate);) Equipment used for variable application rates.) Established Salt Application Rate Guidelines
Calibration
Document:) equipment calibration (method and how often) Minimum requirement = annually at start of snow season for each pertinent piece of equipment
Measurement
Minimum requirements

<ul style="list-style-type: none">) Salt usage per event Total snowfall per event) Seasonal Salt usage) Seasonal snowfall) Average salt use per lane-mile;
Accountability
Document: <ul style="list-style-type: none">) Develop guidelines for salt application;) Document plan;) Review collected data and determine adherence to guidelines established within the plan.
Liquid Usage
For pre-wetting or anti-icing (See above)
Temperature
Document: <ul style="list-style-type: none">) Log pavement temperature for all events where treated/untreated salt is used.) Method/equipment for detecting pavement temperature
Forecasting Services
Document: <ul style="list-style-type: none">) Weather forecast system/service used) Data provided by service that enables decision-making for snow/ice operations.
Training
Document: <ul style="list-style-type: none">) Training method/content;) Date(s) of training for each season;) List of employees receiving training;) Frequency of training
Level of Service
Document: <ul style="list-style-type: none">) Provide list of all roads in community and established level of service;) Review collected data and determine adherence to established LOS.
Public Outreach
Document: <ul style="list-style-type: none">) classes provided for general public on proper snow/ice removal technique;) Provide copy of all outreach materials aimed at the general public.

All information from “*Manual of Best Management Practices for Road Salt in Winter Maintenance*” Clear Roads