

REGULATED ASBESTOS CONTAINING MATERIAL HANDLING PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

Submitted To: City of Edinburg
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INTENDED FOR PERMITTING
PURPOSES ONLY

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Table of Contents

EXECUTIVE SUMMARY	1
1.0 AUTHORIZATION.....	1
2.0 LANDFILL DISPOSAL	1
2.1 Notification of Delivery and Load Receipt.....	1
2.2 Load Inspection.....	2
2.3 Disposal Location.....	2
2.4 Unloading Methods	2
2.5 Cover Placement.....	3
3.0 RECORD KEEPING.....	3
3.1 Manifests.....	3
3.2 Log or Site Map.....	4
3.3 Monthly Waste Receipt Summary.....	4
3.4 Deed Recordation	4
4.0 PERSONAL PROTECTIVE EQUIPMENT.....	4
4.1 Respirators.....	4
4.2 Personal Protective Equipment.....	4
5.0 EMPLOYEE TRAINING	5
6.0 CONTINGENCY PLAN	5
6.1 Personal Protection.....	6
6.2 Notification.....	6
6.3 Emergency Cleanup Actions.....	6
6.4 Spill Response Equipment.....	6



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EXECUTIVE SUMMARY

Breathing asbestos fibers into the lungs has the potential to cause disabling lung diseases and cancer. The primary health objective in handling asbestos waste is the prevention of the release of asbestos fibers during demolition, renovation, transportation, and disposal operations. Proper management practices can prevent exposure to asbestos fibers, eliminating the potential for serious health consequences.

This plan has been prepared to ensure proper handling practices of regulated asbestos-containing material (RACM) during disposal operations at the facility, in accordance with applicable federal, state, and local requirements, including Code of Federal Regulations Title 40, Part 61; Title 29, Parts 1910.1001 and 1926.58; Title 49, Parts 171 - 173; and Texas Administrative Code, Title 30, Chapter 330, §330.171(c)(3).

1.0 AUTHORIZATION

30 TAC §§330.171(c)(3), 330.171(c)(3)(A), 330.171(c)(3)(B) & 330.171(c)(3)(I)

Regulated asbestos-containing material (RACM) that has been designated as a Class 1 industrial waste as defined in 40 Code of Federal Regulations Part 61 may be accepted at the facility provided the RACM is handled in accordance with 30 TAC §330.171(c) and the City complies with the provisions of 30 TAC §330.173(g) – (i). The facility is currently authorized to accept RACM under TCEQ Permit MSW-956B and by means of this application is providing written notification to the TCEQ of the intent to accept RACM under TCEQ Permit MSW-956C.

Prior to initial receipt of RACM, the City shall dedicate a specific area or areas of the landfill to receive RACM and shall provide written notification to the TCEQ of the area or areas to be designated for receipt of RACM. After initial authorization to receive RACM is issued, additional areas may be designated by providing written notice to the TCEQ. The location of the area designated to receive the RACM must be surveyed and marked by a registered professional land surveyor and identified on a current site diagram that is maintained at the facility. A copy of the current site diagram identifying the RACM area must be submitted to the TCEQ immediately upon completion of the diagram. The operator shall maintain a record of each load of RACM accepted as to its location by site grid, depth, and volume of material.

2.0 LANDFILL DISPOSAL

2.1 Notification of Delivery and Load Receipt

30 TAC §330.171(c)(3)(D)

The Director of Solid Waste Management (DSWM) or the Site Manager (SM) should be notified by the transporter at least 24 hours in advance of the delivery. Less than 24 hour notice is acceptable provided the DSWM or SM determines that the load can be properly handled and covered.

When a load of RACM arrives at the gate house, the gate attendant shall notify the DSWM, SM, or designee who will oversee the disposal operations. The gate attendant shall check the accompanying manifest (required for RACM) to ensure that all necessary information is properly recorded. If the manifest is properly completed, the gate attendant will direct the driver to the proper disposal location, and record the receipt in an Asbestos or Special Waste Receipt Log.

2.2 Load Inspection

When the load of RACM arrives at the disposal area, prior to unloading, the RACM shall be visually inspected by landfill personnel to determine if the waste has been properly wetted and bagged. A load of RACM determined to be improperly wetted or bagged will be rejected for disposal at this time, and TCEQ will be notified within one working day, in accordance with 40 CFR 61.154(e)(1)(iv).

2.3 Disposal Location

30 TAC §330.171(c)(3)(F)

RACM is to be placed in a disposal area separate from (but possibly immediately adjacent to) the active working face. A separate cell is not required. A minor depression (i.e., three to five feet deep) shall be made with a dozer or compactor prior to unloading. As an alternative, a dozer or compactor may make a cut into the refuse working face, which is deep enough to contain the volume of RACM anticipated (this does not necessarily mean going below grade).

The bags or containers holding the RACM must be placed below natural grade level or, where placement below natural grade is not possible or practical, provisions must be made to ensure that the waste will not be subject to future exposure through erosion or weathering of the intermediate and/or final cover. RACM that is placed above natural grade must be located in the landfill unit such that it is, at closure of the landfill unit, not less than 20 feet from any final side slope of the unit and must be at least ten feet below the final surface of the unit.

A 3-D grid system will be utilized to identify where the waste will be disposed. The site grid system (i.e., 100 foot markers) and site elevation benchmark and will be used in identifying the disposal locations in a log book. The date of disposal, the approximate elevation and grid coordinates, and the volume of waste will be recorded.

2.4 Unloading Methods

30 TAC §§330.171(c)(3)(E) & 330.171(c)(3)(G)

Transporters shall use the method as described below to unload RACM at the landfill.

- RACM must only be accepted at the facility in tightly closed and unruptured containers or bags or must be wrapped with at least six-mil polyethylene.
- Bags or containers holding RACM must be carefully unloaded and placed in their disposal location rather than thrown to the ground. Unloading will be conducted by employees of the generator or transporter.
- Direct discharge of roll-off containers is permitted when performed in accordance with the following procedures:
 - A liner is used with a minimum 6-mil thickness to facilitate sliding of bags from the roll off container without damage by tearing of the bags. A sheet of 6-mil plastic (or equivalent) is placed in the open roll-offs and used to wrap the wetted asbestos in a “burrito wrap” method to prevent airborne particulates. The truck and roll-off box are positioned to unload at the hole excavated in advance for disposal of the waste.
 - With the opened roll-off box tailgate above the edge of the excavation, the bed of the truck and the roll-off box are gradually elevated until the entire envelope slowly slides out of the roll-off box and into the excavation.

2.5 Cover Placement

30 TAC §330.171(c)(3)(G)

RACM will not be compacted directly. Immediately after unloading, the asbestos waste should be covered with a minimum of 3 feet of asbestos-free solid waste or 1 foot of soil. Care should be exercised in the application of the cover to ensure that the bags or containers will not be ruptured.

3.0 RECORD KEEPING

Record keeping for RACM disposal is in the form of manifests and disposal location log. The disposal location log indicating RACM disposal locations is maintained by the landfill manager or designated alternate. A Monthly Waste Receipt Summary form will be completed using STEERS for all loads of industrial RACM which were disposed of during the preceding calendar month.

3.1 Manifests

All shipments of RACM must be accompanied by a Texas Uniform Hazardous Waste Manifest which includes:

- Name, address, and telephone number of the generator.
- Name, address, and telephone number of any transporter.
- Description and quantity of RACM (including Class III Designation).
- Date of receipt and signature of disposal facility representative.

A copy of each manifest must be retained on-site for at least 3 years.

3.2 Log or Site Map

30 TAC §330.171(c)(3)(B)

A RACM disposal log for the landfill must be maintained. The following information should be recorded for each load of RACM accepted:

- The horizontal location of disposal (using the existing site grid system).
- The elevation of disposal.
- The volume of waste.
- The date of disposal.

3.3 Monthly Waste Receipt Summary

Monthly Reporting of RACM from industrial sources will be submitted through the State of Texas Environmental Electronic Reporting System (STEERS).

3.4 Deed Recordation

30 TAC §330.171(c)(3)(C)

Upon closure of the landfill, a specific notification that the landfill accepted RACM will be placed in the deed of records of the property which will include a site diagram or other information identifying the disposal locations of RACM. In addition, a notice of deed recordation and copies of the site diagram or other information identifying the RACM disposal locations will be submitted to the TCEQ executive director.

4.0 PERSONAL PROTECTIVE EQUIPMENT

Respirators and protective clothing prevents exposure of asbestos contamination. Requirements for respirators and protective clothing for spill cleanup are listed below. (Note: If on-site personnel do not meet these requirements, a qualified asbestos cleanup contractor will be contacted. The area will be sealed off until qualified personnel arrive).

4.1 Respirators

- Must be NIOSH approved.
- Must be fit-tested to each individual.
- Must be clean and properly maintained.

4.2 Personal Protective Equipment

- Disposable Tyvek or similar coveralls.
- Gloves (when necessary).
- Foot coverings (when necessary).

The respirator and disposable coveralls should be worn by all personnel in immediate proximity to the RACM cleanup should a spill occur during the disposal operation, workers involved in the cleanup should wear their respirator, disposable coveralls, gloves, and foot coverings.

5.0 EMPLOYEE TRAINING

All employees involved in the receipt and disposal of RACM are given training annually on the proper procedures of managing RACM. This training includes:

- Asbestos and its health effects.
- Regulations on transportation, disposal and worker protection.
- Paperwork, manifesting and notification requirements.
- Personal protection and protective equipment (including respirator fit tests).
- Transportation requirements.
- RACM receipt procedures.
- RACM disposal procedures.
- Location logging and record keeping.
- Spill response actions.

All employee training will be completely documented and maintained on-site.

Contractors and others working around the RACM disposal areas are informed of the RACM disposal practices at the site. Should any excavation work be necessary in areas of previous RACM disposal, a written notification to the TCEQ or EPA Administrator will be made 45 days prior to excavating or otherwise disturbing any RACM. The disposal location will be identified and all personnel working in that vicinity will wear the appropriate protective clothing. Any excavated or exposed RACM will be handled in the same manner as if the waste had just been brought in for disposal.

6.0 CONTINGENCY PLAN

30 TAC §330.171(c)(3)(H)

This contingency plan has been developed in the event that a spill of RACM occurs during unloading operations. Personnel involved in the response are to be kept to a minimum to reduce the risk to employees. The DSWM, SM, or designee, shall be in charge of the facility's spill response for RACM. The following procedures will be followed in the event of a spill of RACM at or near the landfill:

6.1 Personal Protection

- Get upwind of the RACM
- Employees involved in cleanup should make use of the following PPE, including:
 - Respirator
 - Disposable coveralls
 - Shoe covers
 - Gloves
 - Safety glasses or goggles
- Keep others away until cleanup is complete.

6.2 Notification

- Notify the DSWM of SM.
- If the spill of RACM involves a reportable quantity (one pound or more), the National Response Center (NRC) must be notified by the landfill manager, or his designated representative.

6.3 Emergency Cleanup Actions

- Summon water truck, wet down waste with a misting spray of water.
- Scoop the waste and put it into a properly labeled bag or a closed container and dispose of it with the other RACM.
- Wash any contaminated equipment or machinery.
- Dispose of gloves, coveralls, and shoe covers in a tightly sealed 6-mil plastic bag.
- Wash all other personal protective equipment with soap and water.
- Check respirator, refit with new filter cartridges, and place into a resealable, air-tight container for future use.

6.4 Spill Response Equipment

- An OSHA approved respirator with the proper pre-filters.
- A disposable, Tyvek or similar coverall suit.
- Disposable gloves.
- Rubber boots.
- 6-mil plastic bags with asbestos warning.
- Water spray tank.
- Roll of duct tape.
- Broom and shovel.

**APPENDIX IVH
SPECIAL WASTE ACCEPTANCE PLAN**