

ASBESTOS HANDLING PLAN
FOR
CITY OF EDINBURG SANITARY LANDFILL
EDINBURG, TEXAS

PERMIT NO MSW 956B



JUNE, 1998
JULY, 2006
REVISION NO. 1

Revision 1 only

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ATTACHMENT A SITE DIAGRAM FOR CELL SD-2



*7/27/06
Revision 1 only*

**ASBESTOS HANDLING PLAN
EDINBURG SANITARY LANDFILL**

June, 1998

July, 2006 (Revision No.1)

1.0 INTRODUCTION

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 Edinburg's Sanitary Landfill, MSW Permit Number 956B. The plan has been prepared to meet Federal, State and local requirements. These include Code of Federal Regulations Title 40, Part 61; Title 29, parts 1910.1001 and 1926.58; Title 49, Parts 171-173; and Texas Administrative Codes Chapter 30 Part 330.

2.0 NOTIFICATION

The landfill will be notified by the transporter/generator at least 24 hours in advance of a RACM shipment. Less than 24 hour notice may be allowed, provided the landfill manager determines that the load can be properly handled and covered. Generators will comply with all requirements of Edinburg's Special Waste Plan.

3.0 LANDFILL DISPOSAL

3.1 Notification and Recordkeeping

- When a load of RACM arrives at the facility, the gate attendant shall notify the landfill manager, or his designated representative, 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.

3.2 Initial Inspection

- When the load of RACM arrives at the disposal area, prior to unloading, the RACM shall be visually inspected by specifically trained landfill personnel to determine if the waste has been properly wetted, labeled, and bagged. Each bag will be labeled with a label containing the following minimum information and warning:

<p style="text-align: center;">DANGER CONTAINS ASBESTOS FIBERS AVOID CREATING DUST CANCER AND LUNG DISEASE HAZARD</p>
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RACM may only be accepted at the facility in tightly closed and unruptured containers or bags, or must be wrapped with at least 6-mil polyethylene.

A load of RACM determined to be improperly wetted, labeled, or bagged will be rejected for disposal.

- EPA Region 6 will be notified by the DSWM or designated alternate within one working day of any improper wetted or bagged RACM in accordance with 40 CFR §61.154.(e)(1)(iv).
- In an effort to minimize the potential hazard to the public that sending an improperly wetted, labeled, or bagged load back onto public roadways presents, the rejected load will be held in a safe area designated by the landfill manager. The generator must then make arrangements to have the impropriety corrected within 24 hours. After that time, the landfill will make arrangements to make the corrections at the sole expense of the generator.
- During this initial inspection, all personnel in the immediate area shall wear tyvek or similar protective clothing and respirators. A water source shall be on standby in the immediate area in case of a spill during the initial inspection, and shall remain in the immediate area until the RACM is covered as specified in section 3.5.

3.3 Cell Placement

- Specific cells will be defined for disposal of RACM. The total fillable area, with the exception of the required set-back distances from the side slopes and below the final cover, will be considered the potential RACM disposal area. The current cell, SD-2, site

diagram is included as Attachment A. The designated limits of SD-2 was surveyed and recorded by a Registered Professional Land Surveyor. Surveyed limits of new cells will be submitted to the TCEQ, indicating additional RACM disposal areas, as they are constructed and before RACM is placed for disposal. Cell site diagrams showing RACM disposal will be maintained at the Landfill. The boundary locations containing RACM will be marked in the field as the development of the Landfill Progress.

- 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).
- Below Natural Grade fill areas for placement of RACM is preferred. A minimum separation of 3' of other solid waste is required between the bottom and sidewall liner and RACM. However, should this Below Natural Grade disposal not be possible or practical, the following precautions will be taken for Above Natural Grade fill areas to ensure the waste is not subject to future exposure through erosion or weathering of the intermediate and/or final cover. RACM disposal in above natural grade fill areas will be at least 20 feet interior of any design finished side slope of the unit. In addition, RACM disposal will be at least 10 feet below the design finished top final surface elevations of the unit.

3.4. RACM Unloading

Transporter shall use either Method 1 or Method 2, as described below to unload RACM at the landfill.

- *Method 1*-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. All personnel involved in the unloading operation must wear respirators and tyvek or similar protective clothing.
- *Method 2*-Unloading of properly loaded roll-off containers is permitted when performed in accordance with the following procedures:
 - a. Line the bottom and sides of all roll-off containers with a sheet of 6 mil. plastic (or equivalent) prior to placement of the wetted and double bagged RACM. An important

part of this procedure will be the prior inspection of the roll-off boxes. The bottoms and sides must be free from rough or sharp protrusions that would tear the plastic sheet or bags or limit their ability to slide out.

- b. The bags of RACM are hand placed in the lined roll-off box.
- c. A sheet of 6 mil. plastic (or equivalent) is placed over the top of the waste bags in open top roll-offs and secured to the plastic lining the box, effectively developing a plastic envelope around the bags that will completely close and secure the RACM and slide out of the box as a single unit. Completely closed roll-off boxes are secured with a sheet of plastic over the doors of the waste unit.
- d. The truck and roll-off box are positioned to unload at the hole excavated in advance for disposal of the waste.
- e. 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. Bags and plastic sheeting which do not land in the excavation shall be hand-placed, by the transporter personnel wearing respirators and protective equipment, rather than pushed into place by equipment.

3.5 Covering the Asbestos Waste

Asbestos waste will not be compacted directly. Immediately after unloading, the asbestos waste should be covered with a minimum of 3 feet of other 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.

3.6 Grid System Control

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 a temporary elevation benchmark will be carried over to the active asbestos disposal area by registered surveyors 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 in the log book.

4.0 RECORDKEEPING

Recordkeeping for RACM disposal will include manifests, Waste Shipment Records (WSR), a receipt log, and a 3-D disposal location log. The manifests, WSR, and receipt log are normally processed by the gate attendants. The 3-D disposal location log book, indicating RACM disposal

locations, is maintained by the landfill her or designated operator. Each month a Monthly Waste Receipt Summary form will be completed for all loads of RACM that were disposed of during the preceding calendar month.

4.1 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.
 - In the "Supplemental Information" section, include the name, address, and telephone number of the asbestos remover (or Abatement Company). Also include a 24 Hour Emergency Response Team and Telephone Number.
- The white original copy of the signed manifest is to be sent by the disposal facility to the waste generator within 30 days of disposal.
- A copy of each manifest must be retained on-site for at least 3 years.

4.2 Asbestos Waste Receipt Log

A receipt log recording each RACM load should be kept with the minimum following information:

- Name of the generator.
- Manifest number and Edinburg's Special Waste Profile number.
- Date of receipt.
- Volume of asbestos waste.
- Transporter name

4.3 3-Dimensional Disposal Location Log or Site map

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 approximate elevation of disposal.
- The volume of waste.
- The date of disposal.

4.4 Monthly Waste Receipt Summary

A written "Monthly Waste Receipt Summary", Attachment A, will be prepared and submitted to the Texas Commission on Environmental Quality (TCEQ) no later than the 25th day of the month following the receipt of any RACM received during the preceding calendar month. This summary will be filed whether or not any RACM was received. Should the facility decide to discontinue accepting RACM, the TCEQ will be notified in writing by the DSWM.

4.5 Deed Recordation

Upon closure of the Facility, a specific notation that the landfill accepted RACM will be placed in the deed 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.

5.0 PERSONAL PROTECTIVE EQUIPMENT

Respirators and protective clothing prevents exposure and spread of asbestos contamination. Requirements for respirators and protective clothing are as follows:

5.1 Respirators

- Must be OSHA approved.
- Must be fit-tested to each individual.
- Must be cleaned and properly maintained.

5.2 Personal Protective Equipment

- Disposable tyvek or similar coveralls.
- Gloves (when necessary)
- Foot coverings (when necessary)
- Safety glasses or goggles

The respirator and disposable coveralls should be worn by all personnel in immediate proximity

to the disposal of RACM. Should a spill occur during the disposal operation, workers involved in the cleanup should wear their respirator, disposable coveralls, gloves, and foot coverings.

6.0 EMPLOYEE TRAINING

All employees involved in the receipt and disposal of RACM will be 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 Recordkeeping
- Spill response actions

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

Contractors and others working around the RACM disposal areas, will be aware of the RACM disposal practices at the site. Should any excavations work be necessary in areas of previous RACM disposal, a written notification to the TCEQ 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 for disposal.

7.0 CONTINGENCY PLAN

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 Facility manager, or his designated representative, 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:

7.1 Personal Protection

- Get upwind of the RACM
- Employees involved in cleanup should make use of their spill control kits, including:

Respirator

Disposable coveralls

Shoe covers

Gloves

Safety glasses or goggles

Keep others away until cleanup is complete.

7.2 Notification

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

7.3 Emergency 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.

7.4 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 apparatus
- Roll of duct tape
- Broom and shovel
- Safety glasses or goggles