CITY OF EDINBURG SOLID WASTE MANAGEMENT

PERMIT AMENDMENT APPLICATION

Part IV

SITE OPERATING PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

Submitted To: City of Edinburg
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Golder Associates

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EXECUTIVE SUMMARY

30 TAC 330.121(a) & §330.127

This Site Operating Plan (SOP) includes provisions for site management and the site operating personnel to meet the general and site-specific requirements of 30 Texas Administrative Code (TAC) Subchapter D, Operational Standards for Municipal Solid Waste Landfill Facilities. The Edinburg Regional Disposal Facility (facility) shall be operated in accordance with the requirements of this SOP and other applicable local, state, and federal regulations. This approved SOP and the site development plan, the final closure plan, the post-closure maintenance plan, the landfill gas management plan, and all other required documents and plans are operational requirements and shall be considered a part of the site operating record (SOR) of the facility. Any deviation from TCEQ Permit MSW-956C (permit) and the incorporated plans or other related documents associated with the permit is considered a violation of the TCEQ's municipal solid waste regulations.

1.0 RECORDKEEPING REQUIREMENTS

The following sections outline the facility's recordkeeping and records retention requirements.

1.1 Records

1.1.1 Permit and Plans

30 TAC §330.125(a)

Upon permit issuance, a copy of the permit, this SOP and the approved site development plan, the final closure plan, the post-closure maintenance plan, the landfill gas management plan, and any other required plans or related documents shall be maintained in the SOR. The SOR will be properly stored at the Jasman Road Complex, the landfill facilities serving both Type I and Type IV landfills as depicted on Figure II-16, Facility Entrance Plan.

1.1.2 Records Management

30 TAC §330.125(b) – (g) & (d)

Documents will be added to SOR within 7 working days of completion of the item or receipt of analytical data. It shall be the responsibility of the landfill manager to retain all required records, either paper copy or electronic format, and maintain the SOR in an organized format that allows the information to be easily located and retrieved. All information contained in the SOR shall be furnished upon request to the TCEQ and must be made available for inspection by the TCEQ. The different plans required for the facility and all information contained within the SOR, will be retained for the life of the facility, including the post-closure care period. In addition, the TCEQ may set an alternate recordkeeping and notification schedule.

Recordkeeping requirements and recommendations are further summarized on the table below:

Table IV-1: Recordkeeping Requirements and Recommendations

Records Needed	Frequency	30 TAC Rule Citation or SOP Section
Approved SOP, SDP, Closure Plan, Post-closure Maintenance Plan, Landfill Gas Management Plan, and Other Required Plan(s) and Related Documents	Permit Issuance	§330.125(a)
Location Restriction Demonstrations	Permit Issuance	§330.125(b)(1)
Prohibited Waste Inspection Records, Training and Receipt Notification Procedures	Per Occurrence	§330.125(b)(2)
Gas Monitoring Results	Quarterly	§330.125(b)(3); §330.159
Remediation Plans for Explosive and Other Gases	Per Occurrence	§330.125(b)(3)
Unit Design Documentation for Leachate or Gas Condensate Placement	As Required	§330.125(b)(4)
Groundwater Monitoring and Corrective Action Demonstration, Certification, Monitoring, Testing, & Analytical Data	Per Occurrence	§330.125(b)(5)

Records Needed	Frequency	30 TAC Rule Citation or SOP Section
Closure and Post-Closure Care Plans	Permit Issuance	§330.125(b)(6)
Post-Closure Monitoring, Testing, and Analytical Data	Per Occurrence	§330.125(b)(6)
Cost Estimates and Financial Assurance Documentation for Closure and Post-Closure	Annually	§330.125(b)(7)
Facility Operation, Permit Modification, Approvals, and Technical Assistance Correspondence & Responses	Per Occurrence	§330.125(b)(9)
Special Waste Manifests, Trip Tickets and All Other Documents Relating to Special Waste (maintained electronically)	Per Occurrence	§330.125(b)(10)
Other Documents Specified in the Permit or by the TCEQ	As Needed	§330.125(b)(12)
Personnel Training Records per §335.586(d)-(e)	As Needed	§330.125(e)
Personnel Operator License	As Needed	§330.125(f)
Annual Waste Acceptance Rate Documentation	Rolling Quarterly	§330.125(h)
Quarterly Solid Waste Summary Report (STEERS)	Quarterly	§330.675(a)
Annual Solid Waste Summary Report (STEERS)	Annually	§330.675(b)
Unauthorized Material Removal	Per Occurrence	§330.133(b)
Landfill Marker Inspections	Monthly	§330.143(a)
Landfill Gas Management Reports and Submittals	Per Occurrence	§330.159
Cover Inspection Record	Daily	§330.165(h)
Regulated Asbestos-containing Materials (RACM) Acceptance Records	Per Occurrence	§330.171(c)(3)(B)
Site Access Road Records	Monthly	§330.153
Access Control Inspections and Maintenance	Monthly	§330.131
Notices for Access Control Breaches and Repairs	Per Occurrence	§330.153
Fire Occurrence Notices	Per Occurrence	§330.129
Ponded Water Records	Weekly	§4.23 of this SOP
Site Inspection and Maintenance Records	Per Occurrence	§4.5 of this SOP
Daily Log of Litter and Debris Pickup along Public Roads	Daily	§4.12 of this SOP
Additional Temporary Operating Hours	Per Occurrence	§4.7 of this SOP

1.1.3 Training and Licenses

30 TAC §330.125(e)-(f), §335.586(d)-(e), & §30.213

The owner or operator must maintain the following documents and records at the facility:

- the job title for each position at the facility related to waste management, and the name of the employee filling each job;
- a written job description for each position listed. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position;
- a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and
- records that document that the training or job experience required under 30 TAC §335.586 (a) - (c) has been given to, and completed by, facility personnel.

Training records on current personnel must be kept until closure of the facility and training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

The City shall maintain personnel operator licenses issued in accordance with 30 TAC §30, Subchapter F and shall employ at least one Class A licensed operator who supervises or manages the operations of the facility.

1.1.4 Annual Waste Acceptance Rate

30 TAC §330.125(h) & §330.675

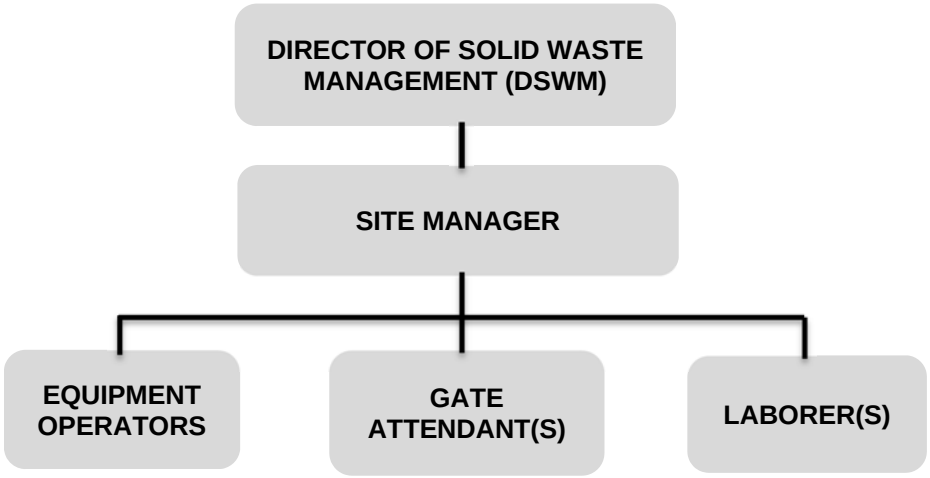
The City shall maintain records to document the annual waste acceptance rate for the facility. Documentation must include maintaining the quarterly solid waste summary reports and the annual solid waste summary reports required by 30 TAC §330.675 through the State of Texas Environmental Electronic Reporting System (STEERS). Whenever the annual waste acceptance rate, as established by the sum of the previous four quarterly summary reports, exceeds the estimated operating rate upon which equipment and personnel staffing has been based, the landfill manager shall make any necessary changes in personnel and equipment as specified in Table IV-3, Waste Volume Equipment and Staff Schedule, to ensure that the site personnel and equipment necessary to safely manage the waste are available. If the annual waste acceptance rate increases beyond the scope described in the current approved permit application and the waste increase is not due to a temporary occurrence, the City shall file an application to modify the permit, including the revised estimated waste acceptance rate, in accordance with 30 TAC §305.70(k), within 90 days of the exceedance as established by the sum of the previous four quarterly summary reports. The modification application will propose any needed changes in the SOP necessary to manage the increased waste acceptance rate in terms of equipment and manpower to protect public health and the environment that are beyond the scope addressed in the current approved permit application. The increased waste acceptance rate may justify requiring permit conditions that are different from or absent in the existing permit. The current and any future estimated waste acceptance rate is not a limiting parameter of the facility's permit.

2.0 PERSONNEL

30 TAC §330.127(1)

The landfill personnel shall include, at a minimum, a landfill manager, one equipment operator, one gate attendant, and at least one laborer for other assigned tasks. The organizational chart below provides the positions and chain-of-command of personnel necessary to operate the facility. The Director of Solid Waste Management for the City (DSWM) will be licensed in accordance with 30 TAC, Part I, Chapter 30, Subchapter A.

Organizational Chart



2.1 Director of Solid Waste Management (DSWM)

The DSWM is responsible for the overall landfill management and general direction of the facility's operations. The DSWM may not maintain a permanent office at the landfill. The DSWM has the authority to hire necessary supervisory and operating personnel for the landfill and to arrange or provide for their training and orientation. This individual also ascertains the facility's equipment needs and initiates requests to replace or obtain additional equipment. The DSWM may also engage outside contractors, as needed, to provide necessary supplemental equipment or services as deemed necessary for site operation. The DSWM, or a person designated by the DSWM, is the designated regulatory contact individual.

The DSWM or designated alternate must be knowledgeable and experienced in aspects of solid waste disposal operations, including relevant regulations, permit requirements, waste-handling, and safe management practices for disposal of MSW and non-hazardous industrial waste and special waste, and will have the required qualifications for licensing under 30 TAC §30.210.

2.2 Site Manager (SM)

The SM or designated alternate shall be responsible for day-to-day activities at the landfill. The site manager shall provide on-site management of the landfill operations. The SM will have the authority and responsibility to reject unauthorized loads, require unauthorized materials to be removed by the transporter, and/or assess appropriate surcharges.

The SM will be responsible for ensuring compliance of day-to-day operations with TCEQ operating requirements and with the SOP. The SM will ensure adequate staffing to provide facility operation in accordance with the SDP, the SOP, and the TCEQ regulations, and will supervise equipment operators,

gate attendants, and laborers, and assign duties as necessary. The SM will coordinate for fire protection training of landfill employees according to §4.4.2.2, Fire Protection Training of this SOP. The SM will be responsible for ensuring the inspection and/or maintenance of all equipment and operating systems required under the permit (i.e., leachate collection system, methane gas collection system, etc.). The SM will serve as the emergency contact and coordinator for the facility, and will be responsible for ensuring the maintenance of the SOR and required logs. The SM must be an experienced personnel manager, who is familiar with and has the aptitude to implement operational aspects of solid waste disposal operations, including knowledge of relevant regulations and permit requirements, waste-handling, and safe management practices for disposal of solid waste, health and safety, and waste identification.

2.3 Equipment Operator

Equipment operators shall be trained in the safe operation of landfill vehicles and heavy equipment. Duties to be performed may include spreading and compacting waste and cover soil as needed to place and contain waste, maintaining access roads, establishing and maintaining stormwater drainage, excavating soils, and completing construction activities in accordance with the SDP. The equipment operators shall also be responsible for daily inspection of equipment for operational and safety conditions. The equipment operators will be trained in prohibited waste identification and will visually observe waste loads as they are placed to help ensure that prohibited wastes are not deposited within the disposal unit. If prohibited wastes are observed, the equipment operators shall immediately notify the site manager or designated alternate. The equipment operators shall also assist other landfill personnel in fire protection operations, moving of litter fences, and other duties, as directed by the SM or designated alternate.

The minimum qualifications for an equipment operator include a demonstrated proficiency in operating heavy equipment and the ability to comprehend and implement the training included in §4.1, Personnel Training of this SOP.

2.4 Gate Attendant

The gate attendants shall be responsible for monitoring, documenting, and measuring incoming waste and collecting appropriate fees. Duties may include selecting random loads for waste inspections in accordance with §4.2, Prohibited Waste Detection and Prevention of this SOP, and directing waste loads to the appropriate disposal area(s). The gate attendant will be trained in safety procedures and in identifying prohibited wastes. If prohibited wastes are observed, the attendant shall not allow the waste into the landfill and shall immediately notify the SM.

The minimum qualifications for a gate attendant include a demonstrated ability to communicate with the customers regarding applicable requirements and the ability to comprehend and use the gatehouse equipment (i.e., scales, computers, etc.) and the training included in §4.1, Personnel Training of this SOP.

2.5 Laborer

Landfill laborers shall have responsibilities as directed by the SM or designated alternate. These duties may include on- and off-site litter control, fire protection operations, dust control, inspection and maintenance of perimeter fences, gate(s), litter fences, and other duties as necessary. Appropriate training will be provided commensurate to the duties and responsibilities of the laborer(s).

The minimum qualifications for a laborer include a demonstrated ability to comprehend the training included in §4.1, Personnel Training of this SOP.

3.0 EQUIPMENT

30 TAC §330.127(2)

Heavy equipment available for day-to-day operations of the disposal areas shall consist of at least one landfill compactor, one bulldozer, earth moving equipment, one motor grader, and a water truck. When major repairs to heavy equipment are needed, the City or its contractors will make additional equipment of similar size and function available.

The landfill compactor shall be a wheeled compactor with a minimum weight of 40,000 pounds with appropriate cleats for sufficient waste compaction. The bulldozer shall be capable of spreading MSW waste and soils for cover, and performing construction maintenance of on-site roads. The water truck shall be used to spread water for dust control and fire prevention/protection, as well as for watering vegetation for sustained growth, as necessary. The earth moving equipment (i.e., loader and dump truck and/or scraper) shall be capable of moving sufficient volumes of soil, as necessary. For additional information regarding the number, sizes, and capacities of the equipment, see Table IV-3, Waste Volume Equipment and Staff Schedule. In addition to the required equipment listed in the table below, miscellaneous pickups and/or other light utility vehicles, as well as various portable water pumps, instruments, and safety and training equipment will be on-site, as necessary. The pickup truck shall be used to haul landfill personnel within the site to conduct site duties and collect windblown and spilled litter (both on- and off-site). The portable pump shall be used to pump stormwater from excavations and ponded areas.

The number, types, and equipment manufacturers of the heavy equipment and miscellaneous vehicles and equipment may vary during site operations based on operational needs and availability.

Table IV-3: Waste Volume Equipment and Staff Schedule

Equipment Type	Waste Acceptance Rate [1][2] (Tons Per Year)				Minimum [3] Size	Function
	Less Than 350,000	350,001 to 750,000	750,001 to 1,250,000	1,250,001 to 1,750,000		
Compactor	1	1	2	2	40,000 lb.	Waste spreading and compaction, fire protection
Bulldozer	1	2	2	3	140 horsepower	Movement and placement of soil, waste spreading and compaction, fire protection
Excavator [2]	1	1	1	1	2.5 cy bucket	Excavation of soil, fire protection
Haul Truck[2]	1	2	2	2	20 cy	Hauling of soil, fire protection
Motor Grader	1	1	1	1	12-ft blades	Grading of access roads
Water Truck	1	1	1	1	1,500 gallons	Dust control, fire protection
Temporary Litter Fencing	1	3	4	4	four feet high	Active face litter control
Rotary Broom Sweeper	1	1	1	1	4-ft broom width	Road maintenance (cleaning)
Site Manager	1	1	1	1	N/A	See §2.2 Site Manager of this SOP
Equipment Operator	1	3	4	5	N/A	See §2.3 Equipment Operator of this SOP
Gate Attendant	1	2	2	2	N/A	See §2.4 Gate Attendant of this SOP
Laborer	0	3	4	4	N/A	See §2.5 Laborer of this SOP
Pump	1	1	1	1	NA	Storm water removal

Notes:

(1)The equipment size is the minimum size to be provided.
(2)The equivalent function of an excavator and a haul truck(s) working in tandem to excavate and transport soil may be met by a scraper. Thus, at the facility's discretion, the excavator(s) and haul truck(s) may be replaced by a scraper(s) that provides equivalent production rates.
(3) In the event of equipment breakdown or maintenance, backup equipment will be provided from other facilities that the City owns/operates, or from independent contractors or local rental companies, to avoid interruption of waste services and required facility operations.

4.0 GENERAL INSTRUCTIONS

30 TAC §330.127(3)

Operations will be conducted in a professional manner by qualified and trained personnel. Operational objectives will consist of placing the maximum permissible amount of waste in a specified area, properly compacting, covering and managing the waste, and operating the site in compliance with the TCEQ regulations, the site permit, and the SOP. The following Table IV-4, Facility Operations, Inspection, and Maintenance List includes general instructions that the operating personnel will follow concerning the operational requirements of the facility.

Table IV-4: Facility Operations, Inspection, and Maintenance List

Description of Activity	Task	Frequency	Inspector	Inspection Documentation
Entrance Gate and Perimeter Fences	Conduct inspection of gate and perimeter fences to ensure that no breach has occurred. If breach occurs, notify TCEQ, as specified in §4.5.2 Notification of this SOP	Weekly	Director of Solid Waste Management, Site Manager, or Designee	Note status and maintain in SOR
Cover Application Record	Record date of cover, how it was accomplished, and the last area covered, according to 330.165.	Daily	Director of Solid Waste Management, Site Manager, or Designee	Document daily, intermediate, and final cover application, sign form, and place in SOR
Perimeter Drainage Channel and Pond Maintenance	Inspect channels for litter and debris, establish flowline, as required. Inspect detention ponds for damage.	Inspect weekly Maintain as needed	Director of Solid Waste Management, Site Manager, or Designee	Document weekly, place in SOR
Random Load Inspection	Conduct inspection of selected vehicle to ensure that no unauthorized wastes are in the load.	Weekly, as specified in §4.2.2.4 Random Inspections of this SOP	Director of Solid Waste Management, Site Manager, or Designee	Place completed Load Inspection Report in SOR
Unauthorized Material Removal	Document removal of unauthorized materials from the landfill.	Per Occurrence	Director of Solid Waste Management, Site Manager, or Designee	Complete Unauthorized Material Removal form and place in SOR
Final Cover Inspection	Inspect final cover for erosion and damage to drainage structures.	As indicated in the SWPPP or weekly at a minimum	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR

Description of Activity	Task	Frequency	Inspector	Inspection Documentation
On-site Litter Collection	Inspect site for litter. Collect litter on a daily basis and return to the working face for proper disposal.	Daily	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR
Mud and Debris Cleaned from Public Roads	Inspect public roads for evidence of mud and debris tracked from the site.	Daily during periods of inclement weather	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR
Fire Extinguishers/ Firefighting Equipment	Inspect all fire extinguishers and/or firefighting equipment, promptly repair or replace defective equipment.	Annually	Director of Solid Waste Management, Site Manager, or Designee	Properly mark tags on fire extinguishers, document results of equipment inspections, place in SOR
Markers and Benchmarks	Inspect markers and benchmarks for damage. Replace markers that are removed or destroyed within 15 days of removal or destruction.	Monthly	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR
Roadway Regrading	Inspect on-site access roadways to ensure a clean and safe condition.	As needed or Quarterly	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR
Site Signs	Inspect all site signs for damage, general location, and accuracy of posted information.	Weekly	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR
Ponded Water	Inspect site for potential ponding and ponded water. Fill and grade low areas as soon as practical.	Weekly	Director of Solid Waste Management, Site Manager, or Designee	Complete documentation and place in SOR

Notes:
SWPPP = Storm Water Pollution Prevention Plan

4.1 Personnel Training

30 TAC §§330.127(4), 335.586(a), & 335.586 (c)

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the applicable requirements of 30 TAC §335.586. The City must ensure that this program includes all the elements described in the description of the type and amount of both introductory and continuing training that will be given to each personnel position.

This program must be directed by a person trained in waste management procedures, and must include instruction that teaches facility personnel waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- communications or alarm systems;
- response to fires or explosions;
- response to groundwater contamination incidents; and
- shutdown of operations.

More detailed written descriptions of the type and amount of introductory and continued training provided to each employee as well as documentation of training will be maintained in the SOR. Facility personnel must take part in an annual review of the initial training required. The site manager, equipment operators, gate attendants, and laborers are trained in the contents of this SOP and other topics, as described in the following Table IV-5, Personnel Training:

Table IV-5: Personnel Training

Position	Job Description	Site Orientation	Site Operations	Endangered Species	Prohibited Waste Identification	Safety (job specific)	Fire Prevention	Load Inspection	Prohibited Wastes	Spill Prevention Control	Emergency Response	Litter Control	Random Inspection	Stormwater Pollution Prevention	Leachate System Maintenance
Site Manager	Responsible for all activities, ensure adequate staffing, inspections	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Gate Attendant	Take receipts, screen and some load inspection, direct vehicles to unloading area	X			X	X	X	X	X		X		X		

Position	Job Description	Site Orientation	Site Operations	Endangered Species	Prohibited Waste Identification	Safety (job specific)	Fire Prevention	Load Inspection	Prohibited Wastes	Spill Prevention Control	Emergency Response	Litter Control	Random Inspection	Stormwater Pollution Prevention	Leachate System Maintenance
Equipment Operator	Compact waste, visual inspection of loads, unauthorized waste identification, apply daily cover	X		X	X	X	X	X	X	X	X		X		As Assigned
Laborer	As assigned	X		X		X	X				X	X			

4.2 Prohibited Waste Detection and Prevention

30 TAC §330.127(5

The facility has and will continue to implement procedures for the detection and prevention of the disposal of prohibited wastes, including regulated hazardous waste as defined in 40 Code of Federal Regulations (CFR) Part 261, and of polychlorinated biphenyls (PCB) wastes as defined in accordance with 40 CFR Part 761 unless authorized by the United States Environmental Protection Agency. Prohibited wastes that shall not be accepted are identified in Part II, Waste Acceptance Plan.

4.2.1 Training for Inspecting Loads

30 TAC §330.127(5)(C)

Facility personnel will be trained to inspect vehicles and identify regulated hazardous waste, PCB waste, and any prohibited waste described above. At a minimum, the gate attendant and equipment operators at the working face will be trained in screening and inspection procedures for prohibited waste and trained to recognize potential sources of prohibited waste, such as microelectronics manufacturers, electronic companies, metal plating industry, automotive and vehicle repair service companies, and dry cleaning establishments. The personnel will receive on-the-job training from the site manager or designated alternate. Records of employee training on prohibited waste control procedures will be maintained in the facility SOR.

4.2.2 Procedures to Control the Receipt of Prohibited Wastes

30 TAC §330.127(5)(A)

Procedures to control the receipt of prohibited wastes are designed to minimize the potential that the facility will receive hazardous or otherwise unacceptable waste for disposal. The following sections discuss the methods and procedures that will be used to control prohibited wastes at the facility.

4.2.2.1 Access Control

A means to control the disposal of prohibited waste at the landfill is by the control of access into the facility by unauthorized vehicles. This issue is addressed in §4.5, Access Control of this SOP.

4.2.2.2 Special/Industrial Waste Screening

Pre-screening customers bringing special waste and industrial waste to the facility is an additional means of controlling the receipt of prohibited waste. A detailed description of the special waste screening process is provided in the Appendix IVH, Special Waste Acceptance Plan (SWAP). This plan has been and will continue to be an essential element to preventing the acceptance or disposal of prohibited wastes.

4.2.2.3 Gatehouse Waste Screening

During hours of operation, the gatehouse will be staffed with at least one gate attendant. The attendant, trained for inspecting loads, will screen incoming loads and customers to help ensure that no prohibited wastes are being brought to the landfill. In addition, the facility will provide a sign in a conspicuous location that will list wastes that are prohibited for acceptance at the facility.

If the attendant suspects prohibited waste is present in an incoming load, then that load will be directed to an area out of the flow of traffic, and trained personnel will further assess the load. Appendix IVA, Waste Discrepancy Report Form will be used to document the inspection and includes the date, time, name of the inspector(s), type of inspection/screening (i.e., suspected prohibited waste), transporter/generator information, and waste information. The inspection report shall be placed in the SOR within 7 working days of the inspection.

4.2.2.4 Random Inspections

The gate attendant, or other designated landfill personnel, will randomly select one load per day for inspection, notify the equipment operator, and direct the selected load to the working face. Once the selected load arrives at the working face, the equipment operator will direct the vehicle to a separate but adjacent location on the working face out of the flow of normal disposal traffic. The driver will be instructed to discharge the load onto the ground. The equipment operator will then visually inspect the contents of the load and document the presence of any prohibited waste.

Appendix IVB, Random Load Inspection Form will be used to document results of the random load inspection and includes information such as the date and time of inspection, name and signature of inspector(s), type of inspection/screening (i.e., random screening, suspected unauthorized waste, etc.), transporter/generator information (including hauling company name and license plate number), source of waste, contents of load as reported by driver, contents of load as observed by inspector, and approval or disapproval of the load. The inspection report will be placed in the SOR within 7 days of the inspection.

Loads that are excluded from random inspections are:

- Waste from transfer stations, providing that the transfer station is permitted or registered by the TCEQ and conducts random screening (waste received from transfer stations is already subject to visual inspections and random screening prior to arrival at the facility).
- Liquid waste.
- Asbestos waste.

4.2.2.5 Waste Disposal Observation

Equipment operators, trained for inspecting loads, will observe waste being disposed of at the active working face. If an equipment operator suspects the presence of any prohibited waste, the trained personnel will further assess the load. Appendix IVA, Waste Discrepancy Report Form will be used to document the inspection. The inspection report shall be placed in the SOR within 7 working days of the inspection. If the waste is determined to be prohibited, then the prohibited waste remediation plan will be implemented as §4.2.4.1, Prohibited Waste Remediation Plan of this SOP.

4.2.3 Records of All Inspections

30 TAC §330.127(5)(B)

Records of all inspections will be placed in the SOR within 7 days of the inspection.

4.2.4 Notification of Receipt of Hazardous Waste or PCB

30 TAC §330.127(5)(D)

The TCEQ, and any local pollution agency with jurisdiction that has requested to be notified, will be notified of any incident involving the receipt or disposal of regulated hazardous waste (which is defined to exclude waste generated by conditionally exempt small quantity generators, now referred to as very small quantity generators under applicable federal rules) or PCB waste (which is defined as those PCBs and PCB items subject to federal disposal requirements) at the facility.

4.2.4.1 Prohibited Waste Remediation Plan

30 TAC §330.127(5)(E)

Remediation procedures may range from loading prohibited waste back onto the generator's vehicle to loading waste in an on-site container, tarping, testing, and removing the waste to an approved off-site facility. Containers will be marked appropriately with words for the type of prohibited waste it contains, such as "Hazardous Waste" or "PCBs." Remediation procedures for the incident will be documented and included in the facility operating record within 7 days. Remediation procedures will also include any requirements imposed by the TCEQ following the notification of receipt or disposal of prohibited waste.

4.3 Other Site Activities

The site manager, or designated alternate, has responsibility for on-the-job training of other site activities briefly discussed below and ensuring that they are conducted as required by the facility permit, TCEQ regulations, or any other local, state, or federal regulation. However some site activities may arise that are not disucess in this plan.

4.3.1 Liquids Restrictions

The landfill shall not accept bulk or non-containerized liquid waste for direct disposal unless it is household waste other than septic waste. The restriction of bulk or non-containerized liquids, with the exception of household waste other than septic waste, is intended to control a source of leachate. Liquid waste refers to any waste that is determined to contain free liquids by using USEPA Test Method 9095B-paint filter liquids test. Containers holding liquid waste shall not be placed in the landfill unless they are small containers of household waste. The facility shall not accept bulk liquids, such as tank trucks of liquid waste, for disposal.

The facility may accept liquid sludges, grease trap waste, and liquid waste from other municipal sources for processing prior to disposal in accordance with §4.24, Disposal of Special Waste of this SOP.

4.3.2 Pond and Ditch Maintenance

Periodically, as directed by the site manager or designated alternate, site drainage ditches and stormwater ponds may require maintenance and/or cleaning to ensure that they function as intended. The required maintenance may be conducted by site personnel or by a contractor. The maintenance may consist of cleaning up litter and/or small brush/limbs to excavating and removing silt deposits. The amount of maintenance will be determined by the site manager or designated alternate.

4.3.3 Leachate System Maintenance

It will be the responsibility of the site manager or designated alternate to ensure that the leachate collection system remains in good working order. As leachate systems are installed for new cell constructions, landfill personnel will be trained on the operation and maintenance procedures associated with the equipment.

The leachate system at each cell location will be monitored for regulatory compliance. Any system found to not be operating properly will be brought to the immediate attention of the site manager or designated alternate. The site manager or designated alternate will ensure that appropriate measures are taken to repair the system as soon as possible.

4.3.4 Final Cover Maintenance

Final cover in waste areas will be placed as described in Part III7, Closure Plan. Once final cover has been placed, it will be the responsibility of the site manager or designated alternate to ensure that vegetation is established and maintained, and that erosion is minimized. If erosion of the final cover does occur that jeopardizes the integrity of the final cover, additional soil capable of sustaining vegetation will be placed and graded according to the final contours as detailed in Part III 7, Closure Plan, Figure III-7-1, Final Contour Map. After erosion is repaired, seeding and irrigation will be provided over repaired areas to provide revegetation.

4.4 Fire Protection Plan

30 TAC §330.129

This plan includes fire protection standards and site personnel training requirements for all on-site activities.

4.4.1 Source of Earthen Material for Uncovered Waste

The City shall maintain a source of earthen material in such a manner that it is available at all times to extinguish any fires. The source must be sized to cover any waste received for disposal not covered with six inches of earthen material. Sufficient on-site equipment must be provided to place a six-inch layer of earthen material to cover any waste not already covered with six inches of earthen material within one hour of detecting a fire.

4.4.1.1 Adequacy of Earthen Material

During site operations, the site manager shall perform daily monitoring of the working face size. A sufficient volume of earthen material will be maintained on the site within 1,000 feet of the working face at all times to cover a potential fire area equivalent to the size of the working face with 6 inches of earthen material within 1 hour. This source of earthen material may be on-site soil stockpiles, working face diversion and/or containment berms, areas of future excavation, or some combination thereof. Examples of required earthen material volumes are included in the following Table IV-6, Examples of Earthen Material Required for Various Working Face Dimensions.

Table IV-6: Examples of Earthen Material Required for Various Working Face Dimensions

Length of Working Face (feet)	Width of Working Face (feet)	Volume Needed to Cover Working Face (cubic yards)
100	50	111
200	50	222
100	100	222
200	100	444
300	100	667
400	200	1,778

4.4.1.2 Sufficient On-Site Equipment

A bulldozer, earthmoving equipment, and a water truck will immediately mobilize to place earthen material to smother any fire that may occur. A calculation showing the adequacy of the site equipment to place the 6 inches of soil in 1 hour is included in Appendix IVC, Fire Protection Equipment Capacity Calculation

. If the working face size varies or the number of working faces is greater than 1, the landfill manager will evaluate the adequacy of site equipment to place the 6 inches of soil in 1 hour in a manner consistent with the calculations.

4.4.2 Fire Protection Standards and Training Procedures

The TCEQ may approve alternative methods of fire protection. To reduce the possibility of fire and improve the operation of the site and pursuant to 30 TAC §330.133, a minimum of 6 inches of “daily” cover soil, or approved equivalent, shall be placed and compacted over exposed waste at the end of each working day or at least once every 24 hours, in accordance with §4.22.1, Daily Cover of this SOP. Fire protection standards to be used at the facility and how personnel are trained are discussed in the following sections.

4.4.2.1 Fire Protection Standards

Designated landfill personnel regularly take the following steps to minimize the potential for fires:

- No burning of solid waste shall be permitted at this site.
- Burning waste is prevented from being dumped in the active area of the landfill. The gate attendant and equipment operators are trained to observe for hot loads entering the landfill by observing for signs of burning waste, such as smoke, steam, or heat being released from incoming waste loads.
- Fuel spills, if they occur, will be contained and cleaned up immediately.
- Dead trees, brush, or vegetation adjacent to the landfill are removed, and grass and weeds are mowed so that forest, grass, or brush fires cannot spread to the landfill.
- Smoking is not allowed on the active areas of the landfill.

- A source of earthen material adequately sized to cover the working face is maintained in such a manner that it is available at all times to the working face or active disposal area for fire protection.
- If a fire does occur, it shall be promptly extinguished using the procedures described in this SOP.
- The potential for fires shall be minimized by applying cover soils or approved ADC.

4.4.2.2 Fire Protection Training

To minimize hazards regarding fire, employees shall be instructed in controlling small fires. Training of employees will be coordinated by the site manager and will be provided to each new employee as part of the employee training program. Fire control measure training for all landfill personnel will be conducted on an annual basis. All fire extinguishers and/or firefighting equipment on-site will be inspected annually, and any equipment found to be defective will be promptly repaired or replaced. At a minimum, each landfill employee shall be trained for the following:

- Emergency notification requirements.
- Preventive measures to minimize or prevent the possibility of fire.
- Proper use of fire extinguishers or other equipment.
- Procedures to extinguish fire with soil (equipment operators only).

4.4.3 Activities Requiring Fire Protection

Municipal solid waste activities that that store or process combustible materials at the facility include uncovered solid waste; fuel supplies; trees, brush, or unmaintained grasses; equipment/vehicles; buildings; recycling collection area; stored used tires; stored used oil; or other sources. The operator must initiate the following procedures in accordance with this fire protection plan upon detection of a fire:

- Small Fires – If detected soon enough, small fires may be fought with a hand-held fire extinguisher. The fire area may be watered down or smothered with 6 inches of soil, as appropriate, to ensure the fire is out.
- Equipment/Vehicle Fires – If a fire occurs on a vehicle or piece of equipment, the equipment operator should bring the vehicle or equipment to a safe stop. If safety of personnel will allow, the vehicle must be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine should be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment. A fire extinguisher will then be used to extinguish the fire.
- Hot Loads – Burning waste will not be unloaded in the active area of the landfill. After the gate attendant, equipment operator, or other site personnel have identified signs of a possible load of burning waste, or a hot load, the truck will be directed to a portion of the disposal area away from the working face, fuel areas, and other combustion sources where the load can be unloaded without danger of spreading fire. The water truck will water down the waste. The bulldozer will then spread the waste to apply additional water. The bulldozer may smother the fire with soil. The waste will be inspected for signs of fire or hot spots. When the fire has been extinguished and the waste has cooled, the waste will be landfilled.

- Working Face – In the event that a fire is detected at the working face, the burning area should be isolated and pushed away from the working face quickly, or fire breaks should be cut around the fire before it can spread. Efforts to cover the burning area with earthen material must be initiated immediately to smother the fire. Sufficient earthen material will be available to cover the entire working face, if necessary. All vehicles and equipment not involved in smothering the fire will be immediately moved away from the fire. Incoming waste will be temporarily rerouted to another portion of the disposal area and a working face may be established there or work may be halted all together until the fire is extinguished. A bulldozer, earthmoving equipment, and a water truck will immediately mobilize to place earthen material to smother any fire that may occur.

If additional fire protection/fighting measures are deemed warranted by the site manager or designated alternate, emergency assistance may be requested from the City of Edinburg by dialing 911. City emergency response personnel will assess the nature of the emergency and dispatch the appropriate emergency crews. Law enforcement assistance may respond from the City of Edinburg Police Department, or the Hidalgo County Sheriff's Department, depending on availability. Fire, ambulance, and hazardous materials emergencies may be handled by either the City of Edinburg or Hidalgo County, depending on availability.

4.4.4 Notification Requirements

If a fire occurs that is not extinguished within ten minutes of detection, TCEQ Region 15 office in Harlingen, Texas must be contacted immediately, but no later than four hours by telephone, and in writing within 14 days with a description of the fire and the resulting response.

TCEQ Region 15
1804 W Jefferson Ave
Harlingen TX 78550-5247
Tel: (956) 425-6010
Fax: (956) 412-5059

4.5 Access Control

30 TAC §§330.131 & 330.223(a) & (c)

A perimeter fence, a composite of either a four-foot barbed wire fence or a six-foot steel-link mesh fence, is currently installed around contiguous properties owned by the City. The perimeter fence encompasses the facility permit boundary as well as the Type IV Landfill TCEQ Permit MSW-2302 and landfill facilities to the south and additional City owned properties to the east as depicted on Figure II-16, Facility Entrance Plan.

Public access to the facility is controlled by a gate at the facility entrance on Jasman Road. Another maintenance gate is located on the west side of the facility on Encinitos Road. The gate at the facility

entrance is locked by site personnel at the end of the day's operations while the gate on Encinitos Road remains locked unless access is needed by site personnel.

The entrance gate is designed to provide complete access restriction when the site is not open, yet allow plenty of room for vehicles to maneuver through the entrance when the facility is open. All landfill users shall be required to stop at the gatehouse, satisfy applicable waste acceptance criteria, and conduct appropriate business transactions prior to proceeding to the disposal area(s). Since the facility shares the same entrance as the Edinburg Type IV Landfill TCEQ Permit MSW-2302, vehicles containing construction and demolition waste will receive a yellow placard and be directed to the active Type IV Landfill and all other acceptable loads will receive a blue placard and will be directed to the Type I Landfill. Unauthorized vehicles and loads identified as containing prohibited waste shall not be allowed to proceed past the gatehouse.

4.5.1 Inspection and Maintenance Schedule

The fence shall be inspected on a weekly basis, with repairs made as necessary. The gates will be inspected periodically for damage or problems. Appendix IVD, Perimeter Fence and Gate Inspection and Repair Record will be used to document results of the fence and gate inspection. The inspection report will be placed in the SOR within 7 days of the inspection. The fence, gate, and associated signs shall be repaired, maintained, or replaced on an as needed basis to ensure continued site security.

4.5.2 Notification

If access control is breached, the TCEQ's regional office, and any local pollution agency with jurisdiction that has requested notification, will be notified within 24 hours of detection of the breach, including an estimate of when the breach will be permanently repaired. The breach will be temporarily repaired within 24 hours of detection and will be permanently repaired by the time specified to the TCEQ's regional office when it is reported. The TCEQ's regional office will be notified when the permanent repair is complete. If a permanent repair can be made within 8 hours of detection, no notice is required. A copy of these notices will be place in the SOR.

4.6 Unloading of Waste

4.6.1 Unloading Areas

30 TAC §330.133(a)

The various types of unloading areas and their maximum sizes at the facility include the following Table IV-7, Unloading Areas and Maximum Size:

Table IV-7: Unloading Areas and Maximum Size

Unloading Area	Description	Maximum Size
Active Working Face	Municipal solid waste will be unloaded at the active working face(s). More than one working face maybe established to provide for separation of residential and commercial trucks, etc., as described in 4.6.1.1 below.	2 - 80,000 sqft
RACM Disposal Areas	RACM is to be placed in a disposal area separate from (but possibly immediately adjacent to the active working face.	20,000 sqft
Liquid Stabilization Processing Area	Liquid waste will be unloaded at the liquid stabilization processing area located within Subtitle D cells.	40,000 sqft
Brush Area	Brush will be unload in designated area for mulching, currently over Pre-Subtitle D Units 1 – 4.	80,000 sqft
Reusable Material Storage Area	Designated reusable materials storage area will remain free of putrescibles and household wastes with the exception of incidental amounts	40,000 sqft
Large Item Salvage Area	Large item salvage will be unloaded in designated area	40,000 sqft
Tire Area	Incidental tires will be stored in the tire area prior to processing. Periodically, tires will be processed by grinding or other means to reduce size to less than quartered or split, or sent off-site for processing/disposal.	40,000 sqft

4.6.1.1 Active Working Face

The unloading of municipal solid waste (MSW) at the active working face shall be confined to as small an area as practical. Landfill personnel will limit the size of each active working face to a maximum of 80,000 sqft (e.g., 400 feet by 200 feet). The size of each working face will be directly impacted by the amount of wastes being received and may vary accordingly.

In general, there will only be one active MSW working face to reduce odors and windblown waste and to control vector populations. There may be more than one active MSW working face open at any given time, however. Examples of when more than one MSW working face may be open at one time includes the separation of residential and commercial customers, wet weather operation, when wastes are being deposited in a new cell that must receive only select wastes to cover the bottom of the new cell, during a transition from a wet weather area to another MSW working face, during disposal of RACM, or when there may be a “hot load” delivered to the MSW working face and another working face is established until the fire is controlled.

4.6.1.2 RACM

The maximum size of the unloading area for RACM will be 20,000 sqft (e.g., 100 feet by 200 feet). 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. The procedures for managing RACM are provided in Appendix IVG, Regulated Asbestos Containing Material Handling Plan.

4.6.1.3 Liquid Stabilization Processing

Liquid waste will be unloaded at the liquid stabilization processing area located within Subtitle D cells. The maximum size of the unloading area for liquid waste will be 40,000 sqft (e.g., 200 feet by 200 feet).

4.6.1.4 Brush Area

Brush will be unloaded in designated area currently located over Pre-Subtitle D Units 1 – 4. The maximum size of the unloading area for brush will be 40,000 sqft. (e.g., 200 feet by 200 feet).

4.6.1.5 Reusable Materials Storage

30 TAC §330.209(a)

Reusable materials may be received and staged at the facility. The designated reusable materials storage area will remain free of putrescibles and household wastes with the exception of incidental amounts. Reusable materials shall be stored in such a manner that it does not constitute a fire, safety, or health hazard or provide food or harborage for animals and vectors, and shall be contained or bundled so as not to result in litter. The maximum size of the reusable storage area will be 40,000 sqft. (e.g., 200 feet by 200 feet).

The size of the stockpiles may vary depending on the amount of reusable materials received at any given time. The reusable materials staging area may receive approximately 300 tons of material per day and have a maximum amount of 3,000 tons of material stored at one time. Materials at the staging area will be either used onsite for applications such as roadbase, erosion control, etc., or transported offsite to end users. The average time for the materials to be stored onsite is 90 days; the maximum time for the materials to be stored onsite is 180 days.

4.6.1.6 Large Item Salvage

Large item salvage will be unloaded in a designated area with a maximum size of 40,000 sqft. (e.g., 200 feet by 200 feet). The large item salvage and staging area (only non-chlorinated fluorocarbon [non-CFC] containing white goods are accepted for disposal) may receive approximately one ton of large items and white goods per day and have a maximum amount of 180 tons of materials stored at one time. These materials can be stored for a maximum of 180 days and 90 days on average.

4.6.1.7 Tire Area

Whole tires or tire pieces may be stored or processed on-site in an unused portion of the property with a maximum size of 40,000 sqft. (e.g., 200 feet by 200 feet) in accordance with 30 TAC §328.54(c). Storage

shall be above ground in controlled storage piles or in enclosed and lockable containers, pursuant to 30 TAC §328.61. The site will not store tires or tire pieces in excess of 500 used or scrap tires (or weight equivalent tire pieces or combination thereof) on the ground or 2,000 used or scrap tires (or weight equivalent tire pieces or combination thereof) in enclosed and lockable containers. The area used for tire storage and processing will be dedicated to tires only.

Tire piles consisting of scrap tires or tire pieces will be no greater than 15 feet in height and the pile will have a maximum footprint of 8,000 square feet. Indoor storage piles or bins shall not exceed 12,000 cubic feet with a 10-foot aisle space between piles or bins. Scrap tires or tire pieces may be stored in trailers provided the trailer is totally enclosed and lockable for volumes greater than 500 tires.

Tire storage will be located within the permit boundary and in an area that will allow all-weather access for emergency vehicles. Fire lanes will be provided with minimum separation of 40 feet between outdoor piles of scrap tires or tire pieces. Outdoor piles consisting of scrap tires or tire pieces and entire buildings used to store scrap tires or tire pieces shall not be within 40 feet of the property line or within an easement.

The tire storage area will not be located within a designated 100-year floodplain area, and suitable drainage structures or features will be provided to divert the flow of rainfall run-off or other uncontaminated surface water within the scrap tire storage site to a location off-site.

Tires will be split, quartered, shredded, and otherwise processed to ensure current approved limits for MSW landfills are not exceeded. (i.e., 500 tires on the ground or 2,000 tires in enclosed and lockable container[s]). Scrap tires shall be split, quartered, or shredded within 180 days from the date of delivery to the scrap tire storage site. The average length of time tires will be stored is 90 days. Off-the-road tires that are used on heavy machinery, including earthmovers, loader/dozers, graders, agricultural machinery, and mining equipment are exempt from this requirement. Truck tires shall not be classified as off-the-road tires and thus are not exempt from this requirement. Appropriate vector controls shall be used at a frequency based upon type and size of piles, weather conditions, and other applicable local ordinances. The tire storage area will remain free of putrescibles and household wastes. The tire storage and processing activity shall not be conducted in a manner that will adversely affect operations of the MSW disposal site, or otherwise endanger human health or the environment.

Quartered, shredded, or otherwise processed tires may be beneficially reused or disposed of within the landfill. In the event that tires are not processed on-site they will be transported to an appropriately authorized facility.

4.6.2 Trained Staff to Monitor Incoming Loads

30 TAC §330.133(a)

A trained employee shall be present at the gatehouse at all times during regular waste acceptance hours to monitor all incoming loads of waste, and shall direct traffic to the appropriate unloading area. Trained personnel will also be on duty during regular waste acceptance hours at the working face to direct and observe unloading of solid waste. The City is not required to accept any solid waste that the City determines will cause or may cause problems in maintaining full and continuous compliance.

4.6.3 Unloading Waste in Unauthorized Areas

30 TAC §330.133(b)

The unloading of waste in unauthorized areas is prohibited. Any waste deposited in an unauthorized area must be removed immediately and disposed of properly. Trained staff shall observe each load that is disposed at the landfill.

4.6.3.1 Pre-Operation Notice

30 TAC §330.123

The City shall provide written notice in the form of a geomembrane liner evaluation report (GLER) as described in 30 TAC §330.341 of the final construction and lining of a new disposal cell to the TCEQ for review 14 days prior to the placement of waste. The TCEQ has 14 days to provide a verbal or written response. If by the end of the 14th day following the TCEQ's receipt of the report no comments are received, the City may begin placing waste.

4.6.4 Unauthorized Loads

30 TAC §330.133(b)

The site manager or designated alternate has the authority and responsibility to reject unauthorized loads, have unauthorized material removed by the transporter, and/or assess appropriate surcharges and have the unauthorized material removed by on-site personnel or otherwise properly managed by the facility. The employees will be trained to recognize prohibited waste and their transportation and disposal requirements. A record of unauthorized material removal will be maintained in the SOR.

4.6.5 Prohibited Wastes

30 TAC §330.133(c)

The following wastes are prohibited from disposal in the facility and shall not be intentionally or knowingly offered by a generator or transporter and/or accepted for disposal in accordance to 30 TAC §330.15(e):

Table IV-8: Prohibited Wastes

Prohibited Wastes	Citation
A lead acid storage battery	30 TAC §330.15(e)(1)
Do-it-yourself used motor vehicle oil	30 TAC §330.15(e)(2)
Used oil filters from internal combustion engines	30 TAC §330.15(e)(3)
Whole used or scrap tires unless processed prior to disposal in a manner acceptable to the TCEQ	30 TAC §330.15(e)(4)
Refrigerators, freezers, air conditioners, and any other items containing chlorinated fluorocarbon (CFC) must be handled in accordance with 40 Code of Federal Regulations §82.156(f), as amended.	30 TAC §330.15(e)(5)
Bulk or non-containerized liquid waste unless the waste is household waste other than septic waste	30 TAC §330.15(e)(6)(A)
Containers holding liquid waste unless the container is a small container similar in size to that normally found in household waste, the container is designated to hold liquids for use other than storage, or the waste is household waste.	30 TAC §330.15(e)(6)(B)
Regulated Hazardous Waste other than from CESQGs. Municipal hazardous waste from a CESQG may be accepted, provided the generator provides a certification that it generates no more than 220 pounds of hazardous waste per calendar month.	30 TAC §330.15(e)(7)
Polychlorinated biphenyls (PCB) wastes as defined under 40 CFR Part 761.	30 TAC §330.15(e)(8)
Radioactive materials as defined in 30 TAC §336	30 TAC §330.15(e)(9)

4.6.6 Unloading of Prohibited Wastes

30 TAC §330.133(c)

The unloading of prohibited wastes at the municipal solid waste facility must not be allowed. Necessary steps shall be taken by the City to ensure compliance with this provision. Any prohibited waste must be returned immediately to the transporter or generator of the waste or otherwise properly managed by the City.

The driver shall be advised and will be responsible for the proper disposal of this rejected waste. In the event the unauthorized waste is not discovered until after the vehicle that delivered it is gone, the waste will be segregated and controlled as necessary. An effort will first be made to identify the entity that deposited the prohibited waste and have them return to the site and properly dispose of the waste. In the event that identification is not possible, the Site Manager or designated alternate will notify the TCEQ and seek guidance on how to dispose of the waste as soon as practical.

4.6.7 Disposal Vehicles

Only those persons operating vehicles that comply with the following requirements will be authorized by the Site Manager or designated alternate to dispose of waste at this site:

1. Vehicles and equipment used to collect and transport waste will be in good working order to prevent loss of waste material and to minimize health and safety hazards to landfill personnel and the public.
2. Collection vehicles not equipped with an enclosed transport body will be required to have tarpaulins to preclude accidental spillage.

4.6.8 Site Signage to Disposal Areas

Signs with directional arrows and/or portable traffic barricades will help to restrict traffic to designated disposal locations. Signs will be placed along the access route to the current disposal area or other designated disposal areas that may be established. In addition, rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance.

4.7 Hours of Operation

30 TAC §330.135(a)

Consistent with Part II, Existing Conditions Summary, the land use within a one-mile-radius of the facility is primarily open land used for pastureland and agricultural and industrial purposes. Residential land use is less than 15% of the surrounding land with the closest residence located a quarter-mile west of the facility boundary as demonstrated on Figure II-4, Land Use Map. Therefore, landfill operations and construction activities will have minimal impact on adjacent landowners.

To effectively and efficiently support the facility's ongoing and future operations as a regional disposal facility, the site may be operated 24 hours per day and seven days a week. These operating hours include the times when the facility may be open to the public to accept solid wastes and recyclable materials (6:00 a.m. to 8:00 p.m., Monday through Friday, and 8:00 a.m. to 2:00 p.m. on Saturday); when solid waste, recyclable materials, construction or operational materials, and equipment or supplies may be transported on- or off-site by the City and its contractors (5:00 a.m. to 9:00 p.m., Monday through Friday, and 7:00 a.m. to 3:00 p.m. on Saturday); when heavy equipment may operate (4:00 a.m. to 10:00 p.m., Monday through Friday, and 6:00 a.m. to 4:00 p.m. on Saturday); and when the facility may conduct any other activities or operations (24 hours per day, seven days a week).

4.7.1 Alternative Hours

30 TAC §330.135(d)

Disaster situations, emergencies, or other unforeseen situations for which the facility believes a need exists to extend waste acceptance outside permitted landfill operating hours will be addressed through the TCEQ regional office. Landfill operations outside permitted landfill operating hours will receive TCEQ approval and will be documented in the SOR as Temporary Operating Hours.

4.8 Site Sign

30 TAC §330.137

The facility will conspicuously display at all entrances through which wastes are received, a sign measuring at least four feet by four feet with letters at least three inches in height stating the Type I and Type IV nature of the site, the hours and days of operation, an emergency 24-hour contact phone number(s) that reaches a key landfill staff person with the authority to obligate the facility at all times that the facility is closed, the local emergency fire department phone number, and the facility permit number. The facility sign must be readable from the facility entrance.

A sign indicating prohibition of receipt of hazardous waste, closed drums, and smoking will be posted near the facility entrance or gatehouse. A sign stating that all loads will be properly covered or otherwise secured will be prominently displayed at the facility entrance.

Within the landfill site, additional signs will be placed along the landfill haul road and access road directing customers to where disposal areas are and which roads are to be used.

4.9 Control of Windblown Solid Waste and Litter

The working face will be maintained and operated in a manner to control windblown solid waste and windblown material and litter will be collected and properly managed as provided below to control unhealthy, unsafe, or unsightly conditions.

4.9.1 Working Face

30 TAC §330.139(1)

The working face shall be covered daily to avoid prolonged exposure of waste to wind. In order to prevent disease vectors, control windblown debris and odors, reduce the possibility of fire, prevent scavenging, and improve the operation of the site, a minimum of 6 inches of “daily” cover soil, or approved equivalent, shall be placed and compacted over all exposed waste at the end of each working day or at least once every 24 hours. Weather conditions may result in material occasionally being blown away from the working face during placement operations.

Litter fences or other comparable controls (e.g., portable panels) will be utilized in the immediate vicinity of the working face to help aid in controlling windblown material. The Site Manager or designated alternate shall be responsible for determining the need, type, and placement of litter fences. Litter fences shall either be portable, free-standing fences that can be readily moved, as necessary, with equipment, or they may be temporary fences that consist of poles driven into the waste/soil cover with fencing between them. Typically, the litter fences shall be placed downwind and extend the full width of the working face and shall extend

above the working face. Windblown waste and litter at the working face will be collected and properly managed to control unhealthy, unsafe, or unsightly conditions. The collected waste will be returned to the active disposal area(s).

4.9.2 Scattered Litter

30 TAC §330.139(2)

Litter scattered throughout the site, along fences and access roads, and at the gate will be picked up once a day on the days the facility is in operation. Litter will be collected and properly managed to control unhealthy, unsafe, or unsightly conditions and the collected waste will be returned to the active disposal area(s).

4.10 Easements and Buffer Zones

4.10.1 Easement Protection

30 TAC §330.141(a) & §330.543(a)

No solid waste unloading, storage, disposal, or processing operations will occur within any easement, buffer zone, or right-of-way (ROW) that crosses the site. There are currently two pipeline easements depicted on Figure IA1, Land Ownership Record Map and no ROWs within the permit boundary. Additionally, no solid waste disposal will occur within 25 feet of the center line of any utility line or pipeline easement unless otherwise authorized by the TCEQ.

4.10.2 Easement Marking

30 TAC §330.141(a) & §330.543(a)

All pipeline and utility easements will be clearly marked with green posts that extend at least six feet above ground level, spaced at intervals no greater than 300 feet.

4.10.3 Buffer Zones

30 TAC §330.141(b) & §330.543(b)

A minimum separating distance will be maintained between solid waste processing and disposal activities within and adjacent to the facility boundary on property owned or controlled by the City as determined by the requirements of 30 TAC §330.543(b). Such buffer zones are detailed in Part II, Facility Layout Plan. The buffer zones will provide for safe passage for fire-fighting and other emergency vehicles.

4.11 Landfill Markers and Benchmarks

30 TAC §330.143

4.11.1 Inspection and Maintenance

30 TAC §330.143(a)

All required landfill markers and benchmarks will be maintained so that they are visible during operating hours. Markers that are removed, destroyed, or determined not to meet regulatory requirements shall be replaced or repaired within 15 days thereafter. All markers will be repainted as necessary to retain visibility. It is the responsibility of the SM to ensure that landfill markers and benchmarks are inspected for regulatory compliance on a monthly basis. Records of all inspections will be maintained in the SOR.

4.11.2 Landfill Marker Installation and Color-Coding

30 TAC §330.143(b)(1)

Landfill markers will be installed to clearly mark significant features. In the event a marker location falls in a roadway, waterway, or other area incapable of sustaining an above ground marker, an alternate marker may be placed with the offset from its true location noted on the marker. The TCEQ may modify specific marker requirements to accommodate unique site-specific conditions. All markers will be durable posts, steel or wooden, extending at least six feet above ground level and will not be obscured by vegetation. Sufficient intermediate markers will be installed to show the required boundary and because the size of the site, all markers will be incrementally installed such that the markers are in place prior to cell construction or operations. Markers will be installed at the following locations and color coded as follows:

Table IV-9: Marker Color-Coding

Marker	Color
Facility Boundary	Black
Buffer Zone	Yellow
Easements and Rights-of-Way	Green
Landfill Grid System	White
Geosynthetic Liner Area / GLER	Red
100-yr Flood Protection	Blue

4.11.3 Boundary Markers

30 TAC §330.143(b)(2)

Site boundary markers (color-coded black) will be placed at each corner of the facility and along each boundary line at intervals no greater than 300 feet. Fencing with color-coded posts may be used in place of these markers, as appropriate.

4.11.4 Buffer Zone Markers

30 TAC §330.143(b)(3)

Buffer zone markers (color-coded yellow) will be placed along each buffer zone boundary at all corners and between corners at intervals of no greater than 300 feet. Placement of the landfill grid markers may be made along a buffer zone boundary.

4.11.5 Easement and Right-of-Way Markers

30 TAC §330.143(b)(4)

Easement and right-of-way markers (color-coded green) will be placed along the centerline of an easement and along the boundary of a right-of-way at intervals of 300 feet and at each corner within the facility and at the intersection of the facility boundary.

4.11.6 Landfill Grid System Markers

30 TAC §330.143(b)(5)

A landfill grid system (color-coded white) will be installed at the facility. The grid system will encompass at least the area expected to be filled within the next three-year period. Although grid markers must be maintained during the active life of the facility, post-closure maintenance of the grid system is recommended, but not required. An alphanumeric grid system will be used, consisting of lettered markers along two opposite sides, and numbered markers along the other two sides. Markers will be spaced no greater than 100 feet apart measured along perpendicular lines. Where markers cannot be seen from opposite boundaries, additional markers will be installed, where feasible.

4.11.7 GLER Area Markers

30 TAC §330.143(b)(6)

GLER area markers (color-coded red) will be placed so that all areas for which a GLER has been submitted and approved by the TCEQ are readily determinable. Such markers are to provide site workers immediate knowledge of the extent of approved disposal areas. These markers will be located so that they are not destroyed during operations until operations extend into the next GLER. The location of these markers will

be tied into the landfill grid system and will be reported on each GLER submitted. GLER markers will not be placed inside the approved disposal areas.

4.11.8 Flood Protection Markers

30 TAC §330.143(b)(7)

Flood protection markers (color-coded blue) will be installed for any area within the 100-yr floodplain that is subject to flooding prior to the construction of a flood protection levee. The area subject to flooding will be clearly marked by means of permanent posts spaced not more than 300 feet apart or closer, if necessary, to retain visual continuity.

4.11.9 Permanent Benchmark

30 TAC §330.143(b)(8)

A permanent benchmark has been established at the site in an area that is readily accessible and will not be used for disposal. The benchmark monument is a bronze survey marker set in concrete with the benchmark elevation and survey date stamped on it. The monument elevation was surveyed from a known United States Coast and Geodetic Survey benchmark. The benchmark monument location is provided in Part I, Figure I-1, Facility Location Map.

4.12 Materials Along Route to Site

30 TAC §330.145

The City will encourage persons hauling waste to the site to enclose their vehicles or utilize a tarpaulin, net, or other means to effectively secure the load to prevent the escape of any part of the load by blowing or spilling. These efforts will include, as necessary, signs posted at the landfill entrance requiring the loads to be enclosed or covered, verbal or written admonitions to drivers or customers, the possibility of reporting offenders to the City of Edinburg Police Department, adding litter control surcharges, or other actions to encourage compliance.

At least once on a daily basis and during daylight hours when the facility is in operation, public access roads serving the facility will be inspected and cleaned of spilled materials and windblown waste for a distance of 2 miles in either direction from any entrances used to deliver waste to the site. As necessary, litter found along Jasman Road, FM 2812, and US Hwy 281 will be picked up by landfill personnel or other persons acting in coordination with the landfill operator. The landfill's pickup truck and personnel will be utilized to gather the litter, secure it on the vehicle, and transport it back to the landfill for proper disposal. Litter control outside the site will not be conducted during night hours. It shall be the responsibility of the SM or designated alternate to ensure that litter control outside the facility is conducted in a safe and timely manner using appropriate personnel and equipment. The SM or designated alternate shall make proper arrangements to

gather items that are too large to be picked up by conventional means. The SM or designated alternate will record daily cleanup efforts on a log that will be maintained in the SOR.

The SM will be responsible for consulting with officials of TxDOT, who has maintenance authority over FM 2812 and US Hwy 281, concerning cleanup when necessary. The City's litter abatement efforts along FM 2812 and US Hwy 281 will be subject to any limitations or requirements imposed by TxDOT.

4.13 Disposal of Large Items

30 TAC §330.147

Items that can be classified as large, heavy, or bulky can include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, and automobiles. Large, heavy, or bulky items that cannot be incorporated in the regular spreading, compaction, and covering operations at the landfill will be recycled. Items identified as being too large for proper disposal shall be refused, broken into smaller pieces, or crushed by compactor equipment to prevent bridging and localized subsidence.

Large items to be salvaged will be placed in a designated area away from the general flow of traffic, so as not to interfere with prompt sanitary disposal of solid waste, but readily assessable to all users. Large items will be removed from the site frequently to prevent them from becoming a nuisance and to preclude the discharge of any pollutants.

White goods may be recycled. No items containing CFCs will be knowingly accepted. Refrigerators, freezers, air conditioners, and any other items containing CFCs must be handled in accordance with 40 CFR §82.156(f), as amended, and with §4.2.2, Procedure to Control the Receipt of Prohibited Wastes of this SOP, which requires verification that the CFC has been evacuated from the unit.

4.14 Odor Management Plan

30 TAC §330.149 .

MSW landfill operations have the potential to yield odorous emissions. Odor management at a landfill is a combination of identifying the sources of odor and methods used to minimize or eliminate those odors. This odor management plan addresses the identification of potential sources of odors, and includes methods to minimize odors or sources of odors and procedures to be followed if these methods are ineffective in preventing a release of odors to the surrounding community.

4.14.1 Sources of Odor

Sources of odor that emanate from a landfill can vary considerably and may include the wastes being delivered to the landfill, the open working face, or the leachate collection or landfill gas management

systems. Some of the wastes received at a landfill are a source of odor upon receipt, such as sludge and dead animals. Other wastes have the potential for becoming a source of odor by their decomposition characteristics, generating odors or gases as they are rapidly decomposed by microorganisms. Leachate, the liquid that passes through or emerges from solid waste, may also be a source of odor if not properly managed. Ponded water can also become a source of odor as well.

4.14.2 Odor Minimization

The primary objectives for odor control at a landfill are to minimize odor generation and odor emissions. Methods used to achieve these objectives include waste and leachate handling procedures, the timely placement of cover materials, the elimination of ponded water, and gas control. These methods, described briefly below, are also included in Part III.

Waste Handling Procedures – Putrescible wastes will to be deposited at the working face, spread into layers that can be readily compacted, and subsequently compacted and covered with soil or with an approved alternate daily cover (ADC) material such as tarps or other applied materials. Sludges, septage and grease trap wastes that pass the paint filter liquids test will be incorporated into the working face with other absorptive wastes before cover is applied. Dead animals will be covered immediately with 3 feet of waste or 2 feet of soil.

Cover – The placement of daily cover is sufficient to reduce the immediate emission of odors when applied in sufficient thickness (minimum of 6 inches soil) and with the proper compaction or other approved cover. Daily cover also serves as the first deterrent to odor generation by preventing air and water from further impacting the wastes. If odors result during the use of ADC material, the ADC will be reevaluated to determine if it will continue to be used. The subsequent placement of intermediate and final cover will provide an additional barrier that will reduce the amount of odor emissions as decomposition of wastes occurs over time. Cover procedures are further discussed in §4.22, Landfill Cover of this SOP.

Leachate Handling Procedures – Leachate will be removed from the collection system at a rate to maintain less than 30 cm of head on the liner. Leachate may be removed by pumping directly from the leachate collection sump to a storage tank, evaporation pond, recirculation system, or a transfer truck. The evaporation pond may be a source for odors and will be monitored. The evaporation pond may be equipped with aerators to further reduce the emission of odors by forcing oxygen into the leachate.

Ponded Water – Water ponded over waste disposal areas may become a source of odors and should be eliminated prior to the occurrence of odors. Ponded water that occurs in the active portion of the site or on a closed area will be eliminated as quickly as possible and the area in which the ponding occurred shall be filled in and regraded within 7 days of the occurrence as further discussed in §4.23, Ponded Water of this SOP.

Gas Extraction System – Odor reduction may be achieved by installing a gas extraction system. The gas extraction system will minimize the migration of gases either horizontally or vertically. Gases collected in an extraction system may be distributed to such processing devices as a flare or processing plant as further discussed in §4.19, Landfill Gas of this SOP.

4.14.3 Odor Response Procedures

Upon identification of an odor emission from the landfill that may adversely impact off-site receptors, landfill personnel will attempt to isolate the source of the odor. If an identifiable source of the odor is detected, the SM or designated alternate will be notified, who will ascertain and initiate the necessary remedial actions. Remedial actions may include applying additional cover over the suspect area, using odor controlling sprays applied directly to the working face or installing misters, controlling any ponded water on the site, adjusting the gas extraction system, sealing the riser pipe covers or otherwise adjusting the leachate collection or management system, or other methods proven to be beneficial for remediating landfill odors. If odors persist, the SM may contract with an engineer or other expert to address specific remediation issues.

4.15 Disease Vector Control

30 TAC §330.151

Conditions favorable to the production or harboring of disease vectors (rodents, flies, and mosquitoes) will be minimized through proper compaction of the waste and the use of daily and intermediate cover, as appropriate. Vectors are attracted by exposed wastes and water that serve as food and breeding grounds. The size of the working face of each disposal area will be minimized and daily cover will be applied to control disease vectors. Landfill cover procedures are described in §4.22, Landfill Cover of this SOP. To further control disease vectors, ponded water shall be controlled, as detailed in §4.23, Ponded Water of this SOP. Birds should also be controlled by using the daily cover, minimizing the working face size, and controlling ponded water. Site personnel should be observant for insects and rodents and report problems to the landfill manager or designated alternate. Professional exterminators will be contacted, if necessary, to eliminate rodents or other pests that may appear at the site. If chemicals are needed for disease vector control, a professional will apply the appropriate chemical at the industry recommended rate, and use the appropriate health and safety practices to minimize any potential adverse effects.

4.16 Site Access Roads

4.16.1 All-weather Roads

30 TAC §330.153(a)

The public roadway that provides access to the facility's entrance is currently paved. All-weather roads will be provided from the gatehouse and scales at the facility's entrance to the unloading areas that are

designated for wet-weather operation. Such interior access roads are characteristically surfaced with caliche, but other all-weather road building materials such as compacted gravel, crushed stone, asphalt, or concrete may be used by the facility.

4.16.2 Tracking of Mud Minimization

30 TAC §330.153(a)

The tracking of mud and associated debris onto public roadways from the facility will be minimized. Traffic leaving the facility will travel southbound on Jasman Road for a quarter-mile to FM 2812. Mud at the facility entrance road and interior access roads will be removed by spraying water from the site water truck, scraping with a site bulldozer or maintainer, using a rotary broom street sweeper, or otherwise deploying site personnel with appropriate on-site materials, tools and equipment. Jasman Road, an asphaltic-concrete-paved road, will be inspected for any tracked mud and associated debris daily. As necessary, mud will be removed from Jasman Road in a similar manner to control the further tracking of mud onto FM 2812. The SM will have authority to implement additional measures (e.g., wheel shakers, wheel washes, etc.) if the preceding measures are not reasonably effective.

4.16.3 Dust Control

30 TAC §330.153(b)

Dust from on-site and other access roads will be controlled on an as-needed basis to avoid becoming a nuisance to surrounding areas. A water source and the necessary equipment will be provided by the City for dust control. The on-site water truck will be equipped and can be utilized for dust control. Sources of water for this process include the on-site municipal water supply, on-site ditches and detention ponds, borrow areas, and/or other outside sources. The SM or his authorized delegate will deploy site personnel with appropriate on-site materials, tools and equipment.

4.16.4 Roadway Maintenance

30 TAC §330.153(c)

All on-site and other access roadways will be maintained in a clean and safe condition. Interior access roadways will be re-graded on a periodic basis by grading and placing additional road materials to minimize depressions, ruts, and potholes, and provide uninterrupted access to the unloading area(s). Additional re-grading or maintenance will be implemented by the SM or his authorized delegate as needed by deploying site personnel with appropriate on-site materials, tools and equipment.

4.16.5 Litter and Debris

30 TAC §330.153(c)

All on-site and other access roads including ditches shall be cleaned of litter and debris. Litter and any other debris must be picked up at least daily and taken to the working face in accordance to §4.9.2, Scattered Litter. Litter and any other debris on Jasman Road, the public access road to the facility, will be removed daily in accordance to §4.12, Materials along Route to Site.

4.17 Salvaging and Scavenging

30 TAC §330.155

Salvaging is the controlled removal of waste materials for utilization, recycling, or sale. Salvaging or recycling of materials, such as metals, cardboard, brush, and white goods, will be allowed with specific authorization from the SM or designated alternate if the activity is conducted by and/or supervised by landfill personnel. However, salvaging will not be allowed to interfere with the prompt sanitary disposal of solid waste or create a public health nuisance. Such items shall be removed on an as-needed basis to prevent the creation of nuisance conditions, to preclude the discharge of any pollutants from the area, and to prevent an excessive accumulation of the material at the facility. Other special wastes received at the facility will not be salvaged. Pesticide, fungicide, rodenticide, and herbicide containers will not be salvaged unless being salvaged through a state-supported recycling program.

Scavenging is the uncontrolled and unauthorized removal of materials at any point in the solid waste management system. Scavenging is prohibited and shall be strictly enforced through site access controls and monitoring by facility personnel, including both human and animal scavenging activities.

4.18 Endangered Species Protection

30 TAC §330.157

Included in Part IIE, Endangered or Threatened Species is an assessment, recommendations provided by Texas Parks and Wildlife Department (TPWD), and agreement with US Fish and Wildlife Service (USFWS). The facility and the operation of the facility will not result in the destruction or adverse modification of the critical habitat of endangered or threatened species, or cause or contribute to the taking of any endangered or threatened species. The facility will be operated in conformance with TPWD's identified best management practices (BMPs) to minimize potential negative impacts to federally-listed and state-listed species. The referenced BMPs are incorporated by reference into this SOP, contain operational criteria for protecting such species, and will be included in the personnel training discussed in §4.1 Personnel Training of this SOP.

Part IIE2-3, TPWD Response to Recommendations includes the following operational practices:

- The City will employ best management practices (BMPs) to minimize potential negative impacts to federally-listed and state-listed wildlife to include a “no kill” policy.
- Any state-listed reptile discovered will be permitted to leave the area on its own or relocated by persons permitted through the TPWD Wildlife Permit Program.
- Any boreholes resulting from drilling activities and any shallow trenches with vertical walls left open overnight will be inspected the following morning.
- Prior to initial clearing and construction activities involving grading or bulldozing in the disposal facility expansion area, operators will be made aware of the potential for state-listed reptiles to occur and implement BMPs if discovered.

The City will not disturb the land within the wildlife corridor depicted in Part IIE3-2, USFWS Meeting Response to preserve the already existing native woodland and ranchland vegetation. If it is inadvertently disturbed by City operations, then the City shall re-establish native vegetation in the affected areas of the wildlife corridor and will coordinate with a qualified biologist to develop a list of native vegetation to be planted and a detailed maintenance plan that ensures an 85% survival rate of the planted vegetation after two growing seasons.

4.19 Landfill Gas

30 TAC §330.159

All landfill gases will be monitored in accordance with Part III6, Landfill Gas Management Plan (LFGMP) and 30 TAC §330.371 (Subchapter I) to help ensure that the concentration of methane gas generated by the facility does not exceed 1.25% by volume in facility structures (excluding gas control/recovery system components) and does not exceed 5% by volume in monitoring points, probes, subsurface soils, or other matrices at the facility boundary. The LFGMP, required reports, and other submittals must be included in the SOR of the facility and submitted to the TCEQ.

4.20 Oil, Gas, and Water Wells

30 TAC §330.161

As described in Part II, Existing Conditions Summary there is one producing gas well, two plugged gas wells, and no existing or abandoned water wells situated within the facility.

4.20.1 Discovery of Water Wells, Oil Wells, Natural Gas Wells, or Other Wells

30 TAC §330.161(a)-(b)

The City will provide written notification within 30 days to the TCEQ of the location of any and all existing or abandoned water wells, on-site crude oil or natural gas wells, or other mineral recovery wells under the

jurisdiction of the Railroad Commission of Texas that are discovered within the facility during the course of facility development.

4.20.1.1 Water Wells

30 TAC §330.161(a)

The City will, within 30 days of such a discovery, also provide the TCEQ with written certification that such water wells have been capped, plugged, and closed in accordance with all applicable rules and regulations of the TCEQ or other state agency. The facility does not require supply from a water well for landfill operations.

4.20.1.2 On-site Crude Oil or Natural Gas Wells, or Other Mineral Recovery Wells

30 TAC §330.161(b)

The City will, within 30 days after the plugging of any such crude oil, natural gas or other mineral recovery well, provide the TCEQ with written certification that such wells have been properly capped, plugged, and closed in accordance with all applicable rules and regulations of the Railroad Commission of Texas. Producing crude oil or natural gas wells that do not affect or hamper landfill operations may be operated within the facility boundary, if identified in the permit for the facility or in a written notification to the TCEQ. Currently there is one producing natural gas well, owned by Faulconer, located within the facility boundary as shown on Figure II-8, Water Well and Oil & Gas Well Location Map that will not affect or hamper landfill operations.

4.20.2 Well Plugging Report

30 TAC §330.161(c)

Any water or other type of wells under the jurisdiction of the TCEQ will be plugged in accordance with all applicable state requirements or additional requirements imposed by the TCEQ. A copy of the well plugging report required to be submitted to the appropriate state agency will also be submitted to the TCEQ within 30 days after the well has been plugged.

4.20.3 Liner Installation Modifications

30 TAC §330.161(d)

The City will submit for TCEQ approval a permit modification application identifying any proposed changes to the liner installation plan as a result of any well abandonment.

4.21 Waste Compaction

30 TAC §330.163

Solid waste will be spread and compacted by repeated passages of compaction equipment such that each layer of solid waste is thoroughly compacted. The first 5 feet of waste placed over the liner system shall be free of brush and large bulky items that would damage the underlying parts of the liner system or that cannot be compacted to the required density. On subsequent waste lifts, a wheeled trash compactor having a minimum weight of 40,000 pounds, or similar equipment, shall be properly utilized to reach a compaction density of at least 1,200 pounds per cubic yard. Effective waste compaction is achieved by spreading solid waste in no less than 1 ft to no more than 2.5 ft lifts and compacting with no less than 4 to no more than 6 passes of a wheeled trash compactor. Typical daily lifts may range from 8 ft to 20 ft thick, depending on size of active working face and daily waste gate rates.

4.22 Landfill Cover

30 TAC §330.165

4.22.1 Daily Cover

30 TAC §330.165(a)

To control disease vectors, fires, odors, windblown litter or waste, and scavenging, the facility will apply six inches of well-compacted earthen material (not previously mixed with garbage, rubbish, or other solid waste), or an approved alternative daily cover (ADC), to the working face or active disposal area at least once every 24 hours. Runoff from areas that have intact daily cover is not considered as having come into contact with the working face or leachate.

To ensure that the daily cover will be adequate, the following procedures will be followed:

- The daily cover will be sloped to drain.
- The daily cover will be compacted with the bulldozer tracks to minimize infiltration of stormwater, graded to drain, and will not have any waste visibly protruding through it.
- The SM or designated alternate will visually inspect the daily cover and document its completion and area of placement.
- The TCEQ may require a chemical analysis of any landfill cover material.

4.22.2 Intermediate Cover

30 TAC §330.165(c)

All areas that have received waste but will be inactive for longer than 180 days will receive either intermediate or final cover. Intermediate cover will not be less than 12 inches of suitable earthen material, with the upper six inches capable of sustaining native plant growth. Intermediate cover will be seeded or

sodded following its application in order to control erosion. Mulch may be used in conjunction with the suitable earthen materials as a method of reducing erosion and as an alternative to seeding and as a means of providing soil enrichment. The intermediate cover will be graded for proper drainage to help prevent ponding of water and to maintain plant growth or other erosion control features. Runoff from areas that have intact intermediate cover is not considered as having come into contact with the working face or leachate.

4.22.3 Alternative Daily Cover

30 TAC §330.165(d)

Appendix IVF, Alternative Daily Cover Operating Plan (ADCOP) includes the Alternative Daily Cover (ADC) materials previously approved for use on a permanent basis and which will be utilized at this facility: hydro-mulch and tarpaulins, and alternate materials such as mulch covers, flexible membranes, petroleum contaminated soils, synthetic foam materials, or other engineered fabrics. The use of ADC is limited to a 24-hour period after which either waste or daily cover as defined in §4.22, Daily Cover of this SOP must be placed.

The use of an additional ADC may be allowed by a temporary authorization under 30 TAC §305.62(k)(1)(A) on a 180-day trial basis. Additionally, one extension of up to 180 days may be granted by the TCEQ. If the TCEQ grants temporary authorization for the use of ADC, status reports on the ADC will be submitted to TCEQ on a 2-month basis that describes the effectiveness of the alternative material, any problems that may have occurred, and corrective actions required and implemented as a result of such problems. Permanent authorization for the use of an additional ADC may be obtained from the TCEQ through a “Notice Modification” in accordance with 30 TAC §§305.70(k)(1). Permanent authorization may be applied for during the temporary trial periods, but in no case shall ADC be continued past the trial periods without first receiving permanent authorization from the TCEQ.

4.22.3.1 Required ADCOP Information

30 TAC §330.165(d)(1)(A)-(E)

The evaluation of the effectiveness of the different alternate material daily cover (ADC) will generally be based on comparisons with soil cover. The ADCOP includes the following:

- a description and minimum thickness of the alternative material to be used
- its effect on vectors, fires, odors, and windblown litter and waste
- the application and operational methods to be utilized at the site when using this alternative material
- chemical analysis of the material and/or the Material Safety Data Sheet(s) for the alternative material
- any other pertinent characteristic, feature, or other factors related to the use of this alternative material

4.22.3.2 Status Reports

30 TAC §330.165(d)(2)

A status report on the ADC will be submitted on a two-month basis to the TCEQ during the temporary authorization period describing the effectiveness of the alternative material, any problems that may have occurred, and corrective actions required as a result of such problems. If no unresolved problems have occurred within the temporary authorization period, status reports may no longer be required.

4.22.3.3 Length of Time

30 TAC §330.165(d)(3)

ADC will not be allowed when the landfill is closed for a period greater than 24 hours, unless the TCEQ approves an alternative length of time.

4.22.3.4 Contaminated Soil

30 TAC §330.165(d)(4)

For any contaminated soil to be used as ADC, the constituents of concern will not exceed the maximum leachable concentrations listed in 30 TAC §335.521(a)(1). The contaminated soil will meet the restrictions under 30 TAC §§330.165(d)(4)(A) and 330.165(d)(4)(B), as discussed in the following two sections.

4.22.3.4.1 Polychlorinated Biphenyl Wastes

30 TAC §330.165(d)(4)(A)

Additionally, the contaminated soil must not contain polychlorinated biphenyl wastes that are subject to the disposal requirements of 40 Code of Federal Regulations Part 761.

4.22.3.4.2 Total Petroleum Hydrocarbons

30 TAC §330.165(d)(4)(B)

Additionally, the contaminated soil will not contain total petroleum hydrocarbons (TPH) in concentrations greater than 1,500 milligrams per kilogram (mg/kg).

4.22.3.5 Constituent Limitations

30 TAC §330.165(d)(5)

ADC must not exceed constituent limitations imposed on waste authorized to be disposed at the facility.

4.22.3.6 Runoff

30 TAC §330.165(d)(6)

The TCEQ may require the City to test runoff from areas that have ADC for compliance with Texas Pollutant Discharge Elimination System (TPDES) storm water discharge limits or manage the runoff as contaminated water.

4.22.4 Temporary Waiver

30 TAC §330.165(e)

The TCEQ may grant a temporary waiver from the requirements of 30 TAC §330.165(a) - (d) if the City demonstrates that there are extreme seasonal climatic conditions that make meeting such requirements impractical.

4.22.5 Final Cover

30 TAC §330.165(f)

Final cover for the landfill must be in accordance with the Part III7, Closure Plan and 30 TAC §330.457 (Subchapter K). The final cover system is designed to minimize infiltration and erosion, and it will be composed of no less than two feet of soil and consist of a clay-rich soil cover layer overlain by an erosion layer that is capable of sustaining native plant growth. The erosion layer will be seeded or sodded immediately following application of the final cover to minimize erosion. The final cover system, including the erosion control structures (such as drainage swales and chutes), will be maintained during and after construction. During the active life of the site, the landfill manager or designated alternate should inspect the final cover system on a weekly basis. Erosion of final cover shall be repaired promptly by restoring the cover material, grading, compacting, and seeding it as necessary.

4.22.6 Erosion of Cover

30 TAC §330.165(g)

Intermediate or final cover that has been seeded and has vegetation established will continue to be maintained. When addressing erosion rills, however, caution will be exercised not to damage the integrity of the vegetative cover system, which could result in greater erosion. To address this concern, minor or incidental erosion rills will be monitored to ensure that they do not develop into areas of significant erosion. Erosion of intermediate or final cover of a magnitude that would be considered significant will consist of areas that, in the opinion of the SM, jeopardize the integrity of the intermediate or final cover (such as deep erosion gullies or wash-outs exceeding four inches in depth). These areas will be repaired within 5 days of detection as weather permits. If conditions warrant, and the TCEQ's regional office approves otherwise,

based on the extent of the damage, time to repair, or weather conditions, the 5 day requirement may be extended.

The date of detection of significant erosion and date of completion or repairs, including reasons for any delays, will be documented in the cover inspection record. The SM or designated alternate will inspect the intermediate and final cover at the site on a weekly basis and after each rain event in which run-off occurs. Inspections and restorations will occur during the entire operational life and for the post-closure maintenance period.

4.22.7 Cover Inspection Record

30 TAC §330.165(h)

A cover application record will be maintained at the site and readily available for inspection by TCEQ and authorized agents or employees of local governments having jurisdiction. The record shall specify the date that cover was accomplished (no exposed waste), how it was accomplished, and the last area covered. This record applies to daily, alternate daily, intermediate, and final cover. For final cover, this record must specify the area covered, the date cover was applied, and the thickness applied that date. Each entry will be certified by the signature of the on-site supervisor that the work was accomplished as stated in the record. A cover inspection record will be maintained that documents inspections of daily, intermediate, and final cover, the findings, and corrective action taken when necessary.

4.23 Ponded Water

30 TAC §330.167

The ponding of water over waste on the landfill, regardless of its origin, must be prevented. Ponded water that occurs in the active portion of the landfill or on a closed portion of the landfill will be eliminated and the area in which the ponding occurred will be filled in and regraded within seven days of the occurrence.

4.23.1 Ponding Prevention Plan

The potential for ponding of water over waste areas will be minimized by achieving adequate compaction during the placement of the wastes and by constructing and maintaining proper cover and slope on all areas so that stormwater will not pond and will drain properly, either to the site drainage system (for intermediate or final covered areas) or to run-off control structures (for active disposal areas). Installation of upgradient diversion berms to minimize the amount of water entering the disposal area and proper construction of the working face slopes will minimize ponding of water over waste in the disposal areas.

Active waste disposal areas of the landfill, including final covered areas not in post-closure care, intermediate cover areas, and daily cover areas, will be inspected at least weekly for signs of ponded water or depressions that could potentially pond water. Additional inspections may be conducted after rainfall

events in excess of 0.5 inches or more rain in a 24-hour period. However, during periods of extended or heavy rainfall, portions of the site may not be readily accessible to vehicles for inspection. During these periods it may be necessary to allow for drying prior to accessing the remote sections of the site for inspection. During the post-closure period of closed portions of the landfill, the final cover will be inspected and maintained in accordance with Part III8, Post-Closure Plan.

Ponded water that occurs in the active portion of a landfill or on a closed landfill will be eliminated and the area in which the ponding occurred will be filled and regarded within seven days of the occurrence. Ponded water areas may be corrected by implementing one or more of the following procedures:

- Pumping water out of the depression.
- Regrading and allowing the water to flow off.
- Adding cover soils to fill the depression and forcing the water onto areas of the landfill that allow the water to dissipate or flow off the landfill.

Water that has been in contact with waste is considered contaminated and in general will be contained in the working face area behind a containment berm. Contaminated water shall be managed in accordance with §4.29, Contaminated Water Management of this SOP. Contaminated water may not be recirculated.

4.24 Disposal of Special Waste

Special waste is any solid waste or combination of solid wastes that because of its quantity, concentration, physical or chemical characteristics, or biological properties requires special handling and disposal to protect the human health or the environment. If improperly handled, transported, stored, processed, or disposed of or otherwise managed, it may pose a present or potential danger to the human health or the environment. Appendix IVH, Special Waste Acceptance Plan outlines the process that will be used to review, evaluate, and determine acceptance of all TCEQ-defined special wastes for the facility.

The acceptance and/or disposal of a special waste, as defined in 30 TAC §330.3(148) (relating to Definitions), is described in Appendix IVG, Regulated Asbestos Containing Material Handling Plan (RACM), and Appendix IVH, Special Waste Acceptance Plan (SWAP). The RACM / SWAP are incorporated by reference into this SOP and will be included in the personnel training discussed in §4.1, Personnel Training of this SOP.

4.25 Disposal of Industrial Waste

Industrial non-hazardous waste is defined by 30 TAC §330.3(66) as solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations, and is classified as follows:

- Class 1 Industrial Solid Waste – any industrial solid waste or mixture of industrial solid wastes that because of its concentration, or physical or chemical characteristics is toxic, corrosive, flammable, a strong sensitizer or irritant, a generator of sudden pressure by

decomposition, heat, or other means, or may pose a substantial present or potential danger to human health or the environment when improperly processed, stored, transported, or disposed of or otherwise managed, as further defined in 30 TAC §335.505

- Class 2 Industrial Solid Waste – any individual solid waste or combination of industrial solid wastes that cannot be described as Class 1 or Class 3, as defined in 30 TAC §335.506.
- Class 3 Industrial Solid Waste – any inert and essentially insoluble industrial solid waste, including materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc. that are not readily decomposable as defined in 30 TAC §335.507.

4.25.1 Class 1 Industrial Solid Waste

30 TAC §330.173(c)

This facility will not accept Class 1 industrial solid waste, with the exception of wastes that are Class 1 only because of asbestos content. Waste classified as Class 1 only because of asbestos content may be accepted by the facility for disposal and will be managed in accordance with 30 TAC §330.171(C)(3)(I) and Appendix IVG, RACM Handling Plan. All Class 1 industrial asbestos wastes will be manifested and the City will submit monthly reports to the TCEQ in compliance with 30 TAC §330.173(g) – (h).

4.25.2 Class 2 Industrial Solid Waste

30 TAC §330.173(i)

Class 2 industrial solid waste, except special wastes as defined in 30 TAC §330.3, may be accepted provided the acceptance of this waste does not interfere with facility operation.

4.25.3 Class 3 Industrial Solid Waste

30 TAC §330.173(j)

Class 3 industrial solid waste may be disposed provided the acceptance of this waste does not interfere with facility operation.

4.26 Liquid Waste Stabilization

Approved liquid wastes that are received at the facility, and wastes that do not pass the paint filter liquids test, will be managed in accordance Appendix IVI, Liquid Waste Solidification Plan. The facility may receive approximately 25 tons of liquid waste on average, and a maximum of 50 tons of liquid waste per day.

4.27 Screening of Deposited Waste

30 TAC §330.175

As discussed in Part II, Existing Conditions Summary, some visual screening currently exists along the southern portion of the facility boundaries. Additional visual screening of deposited waste materials is not necessary because the nearest high traffic roadway is located approximately 1,900 feet to the west and

surrounding land use is primarily agricultural. The City will provide supplemental visual screening of deposited waste materials in the future if the TCEQ determines additional screening has become necessary.

4.28 Facility Generated Wastes

30 TAC §330.205(b)-(c)

Waste generated by the facility's operations, including any solid waste storage and processing units, will be disposed at the facility unless waste generated is unauthorized for acceptance by the facility. Any such waste will be disposed at an authorized solid waste management facility. Wastewaters generated by a facility or all liquids resulting from the operation of the facility shall be managed in accordance with §4.29, Contaminated Water Management of this SOP. Wastewaters include the following:

- Contaminated Water - water that has come in contact with solid waste or leachate
- Leachate - a liquid that has passed through or emerged from solid waste and contains soluble, suspended, or miscible materials removed from such waste
- Gas Condensate - a liquid generated as a result of any gas recovery process at a municipal solid waste facility.
- Cleaning and washing of equipment

4.29 Contaminated Water Management

30 TAC §330.207

All liquids resulting from the operation of the facility will be disposed of in a manner that will not cause surface water or groundwater pollution. Off-site discharge of contaminated waters shall be made only after approval under the Texas Pollutant Discharge Elimination System authority. The facility will ensure that wastewater discharged to a treatment facility permitted under Chapter 26 of the Texas Water Code will not interfere with or pass-through the treatment facility processes or operations, including its sludge processes, use or disposal, or otherwise be inconsistent with prohibited discharge standards including 40 CFR Part 403 (Pretreatment Regulations).

The daily effluent design standard for oil and grease concentration leaving the facility and entering a public sewer system shall not exceed 200 milligrams per liter, the concentration established in the wastewater discharge permit pretreatment limit or the concentration established by the treatment facility permitted under Texas Water Code, Chapter 26, the National Pollutant Discharge Elimination System, or the following liquid effluent limits, if the discharge points do not require compliance with locally set limits.

Table IV-10: Liquid Effluent Limits

Effluent Characteristics	Maximum for any one day:	Average of daily values for 30 consecutive days shall not exceed.
	kg / 1,000 kg or lb / 1,000 lb of raw material	
Oil and grease	0.10	0.05
Total petroleum hydrocarbons (TPH)	0.01	0.01
pH	5.5 – 10.5	5.5 – 10.5

4.29.1 Contaminated Water

The only contaminated water addressed in this section of the SOP is the contaminated water generated at the working face. As discussed in Part III2, Surface Water Drainage Report, run-on and runoff controls for active disposal areas will be utilized to minimize the potential for stormwater contamination. The working face of the active disposal area will be encompassed by a run-on berm (top berm) and a runoff berm (toe berm) for the purpose of segregating potentially contaminated water, water that has come in contact with solid waste or leachate, and non-contact stormwater. The working face, located within a constructed waste disposal unit constructed in accordance with 30 TAC §330.331(b), will have a containment berm designed to ensure an adequate capacity for a 25-year, 24-hour rainfall event in accordance with 30 TAC §330.305(c) with one foot of freeboard. Contaminated water will be pumped in a timely manner directly into either the leachate collection and removal system or the leachate force main connected to a public sewer system in accordance with Part III3 §4.0, Leachate Collection and Removal System.

4.29.2 Leachate

Leachate, a liquid that has passed through or emerged from solid waste and contains soluble, suspended, or miscible materials removed from such waste, will be pumped from the leachate collection and removal system into a force main connected to a public sewer system in accordance with Part III3 §4.0, Leachate Collection and Removal System.

4.29.3 Gas Condensate

Gas condensate, a liquid generated as a result of any gas recovery process at a municipal solid waste facility, will be pumped directly into either the leachate collection and removal system or the leachate force main connected to a public sewer system in accordance with Part III3, Waste Management Unit Design.

4.29.4 Cleaning and Washing of Equipment

The cleaning and washing of equipment shall be performed within the contaminated water storage area whereas contaminated water shall be managed in accordance with Part IV §4.29.1, Contaminated Water.

4.30 Waste Relocation

The complete removal and relocation of waste from Pre-Subtitle D Units 1 – 4 into Subtitle D Units for the construction of Unit 8 needs be performed in manner to safeguard health and to protect the environment. Additional operational requirements for waste relocation are:

- Waste relocation activities shall be conducted in such a manner that they do not disrupt landfill operations.
- Side slopes of excavations into buried waste shall be no steeper than 3H:1V.
- The City shall design, construct, and maintain a run-on control system capable of preventing flow into the waste excavation area in accordance with Part III2 §3.1.1, Run-on Control System.
- Leachate found while uncovering buried waste or contaminated water shall be properly disposed in accordance to §4.29, Contaminated Water Management.
- Buried wastes shall be incrementally excavated per cell in its entirety. The lining system of the Pre-Subtitle D cell must not be removed and must remain operational until all waste within the cell is relocated and leachate properly disposed.
- Facility personnel involved in the waste relocation activities will receive proper training required by 30 TAC §330.247 and use any additional personal protection equipment required to safeguard health and safety.

APPENDIX IVG
REGULATED ASBESTOS CONTAINING MATERIAL HANDLING PLAN

CITY OF EDINBURG SOLID WASTE MANAGEMENT

PERMIT AMENDMENT APPLICATION

Part IV, Appendix G

REGULATED ASBESTOS CONTAINING MATERIAL HANDLING PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

GOLDER ASSOCIATES INC.
Professional Engineering Firm
Registration Number F-2578

INTENDED FOR PERMITTING PURPOSES ONLY

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July 2017
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Revised: January 2018

Project No. 1401491

Golder Associates

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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 IVI
LIQUID WASTE SOLIDIFICATION PLAN

CITY OF EDINBURG SOLID WASTE MANAGEMENT

PERMIT AMENDMENT APPLICATION

Part IV, Appendix I

LIQUID WASTE SOLIDIFICATION PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

GOLDER ASSOCIATES INC.
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INTENDED FOR PERMITTING PURPOSES ONLY

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November 2017
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Figure IVI-1 Solidification/Stabilization Area Layout

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EXECUTIVE SUMMARY

To process/stabilize/solidify approved liquid wastes that are received at the facility, and wastes that do not pass the paint filter liquids test, the facility will utilize a liquid waste solidification/stabilization area(s) located within a constructed waste disposal unit constructed in accordance with 30 TAC §330.331(b).

This plan has been prepared to ensure proper handling practices of liquid waste during disposal operations at the facility, in accordance with applicable federal, state, and local requirements, including Texas Administrative Code, Title 30, Chapter 330, Subchapter E.

1.0 PROCESSING BASINS

The facility will utilize a liquid waste solidification/stabilization area(s) located within a waste disposal unit constructed in accordance with 30 TAC §330.331(b) to process/solidify/stabilize approved liquid wastes that are received at the facility and wastes that do not pass the paint filter liquids test. The liquid waste solidification/stabilization area will be installed within an area that is operational feasible where final cover has not been constructed; and will periodically be relocated because of general sequence of filling operations outlined in Part II §3.7, Sequence of Site Development. The liquid waste solidification/stabilization area(s) will include basins that may vary in size with a maximum number of ten basins – only one solidification/stabilization area may be operational at one time.

1.1 Design and Installation

The facility will utilize a metal basin(s), constructed of plate steel, placed and secured in landfill material and soil. Wastes excavated during basin installation will be properly disposed at the active working face. The basin will be installed so that a minimum of 1 foot of the basin extends above the surrounding soil where the surrounding soils are graded away from the basin to prevent stormwater run-on into the basin(s). A runoff/run-on control berm will be installed around perimeter of the metal basin(s) and solidifying/stabilizing material storage area. This berm constructed of compacted earthen material will be a minimum of 2 foot in height unless the location of the solidification/stabilization area is adjacent to a waste slope with potential for storm water run-on. The berm height requirements and design configurations are detailed in Appendix III2B, Active Face Berm Sizing. In addition, the bottom of the basin(s) will be at least 10 ft above the top of protective cover soil of the underlying constructed lining system. Figure IVI-1, Solidification/Stabilization Area Layout shows typical layout and metal basin and runoff/run-on control berm details.

1.2 Basin Cover

When not in use, basins will be covered with either a portable synthetic cover or fitted cover to prevent accumulation of rainfall within the basin or discharge of contaminated water from the basin.

1.3 Inspection

Each time the metal basin is relocated, operators will inspect the integrity of the metal basins for holes or other signs of leakage. If holes are observed, the basin will be removed and the remaining pit will be observed for the presence of free liquids. If present, free liquids will be removed to another basin. The damaged basin will be repaired prior to further use.

1.4 Decommissioning

If the metal basin is not repaired and is instead decommissioned, the City will either repurpose the metal basin for beneficial use, dispose of it at the active working face, or place it back into existing pit to be filled with any remaining solidified/stabilized wastes and stabilizing/bulking materials, waste approved for acceptance at facility, or soil to a grade matching the surrounding waste surface. Any repurposed metal basin will be properly washed and cleaned prior removal from within the limits of waste disposal units.

2.0 HANDLING PROCEDURES

2.1 Notification of Delivery and Load Receipt

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 liquid waste. Less than 24 hour notice is acceptable provided the DSWM or SM determines that the load can be properly handled and processed.

When a liquid waste load arrives at the gate house, the gate attendant shall notify the DSWM, SM, or designee who will oversee the liquid waste solidification/stabilization operations. The gate attendant shall check the accompanying waste profile to ensure that all necessary information is properly recorded. If the waste profile is properly completed, the gate attendant will direct the driver to the liquid waste solidification/stabilization area.

2.2 Unloading

When the liquid waste load arrives at the designated liquid waste solidification/stabilization area, it will be unloaded into the metal basin(s). Unloading of liquid waste into the basin(s) will be only to an appropriate level within the basin to allow sufficient remaining capacity to accommodate the addition of solidifying/stabilizing materials and effective processing to adequately solidify/stabilize the liquid waste.

2.3 Materials used for Solidification/Stabilization

Materials used to solidify/stabilize the liquid waste include a stabilizing material, bulking agent, uncontaminated soil, or any combination of materials and shall meet the facility's waste acceptance criteria for disposal. Stabilizing materials, used as a binding reagent, may include but are not limited to lime, fly ash, cement kiln dust, or Portland cement. These stabilizing materials will be stored adjacent to the

processing basins within the runoff/run-on control berm and covered by a tarp or stored in a manner to minimize exposure to storm water. Bulking agents, or moisture absorbents, may include but are not limited to compost, straw, wood chips, saw dust, or shredded brush. Inert uncontaminated organic bulking agents may be stored outside the runoff/run-on control berm; all other bulking agents will be stored adjacent to the processing basins within the runoff/run-on control berm and covered by a tarp or stored in a manner to minimize exposure to storm water. Stabilizing materials stored within runoff/run-on control berms will be limited to no more than 50 tons at one time. Uncontaminated soil used may be from an onsite soil borrow source and may be stockpiled outside the runoff/run-on control berm. Contaminated soil accepted in accordance with Part IVH, Special Waste Acceptance Plan may be used as well and must be stockpiled inside the runoff/run-on control berm.

2.4 Processing

Using an excavator or similar mixing equipment, the liquid wastes will be mixed with a solidifying/stabilizing materials within the basin and will be removed from the basin for disposal by the same equipment. The mixing equipment will scrape any residual materials from the basin sides to prevent any cumulative build-up of material that could contribute to odors or vectors. Once solidified/stabilized, the waste will be removed from the basin and deposited in the active face for landfilling.

2.5 Verification

Each batch of solidified/stabilized material will be tested for free liquids in accordance with the Method 9095B (Paint Filter Liquids Test), as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication Number SW-846), as amended. Upon verification of the solidified/stabilized material passing the paint filter liquids test, or other approved test, the mixture will be removed for disposal.

2.6 Air Protection and Odor Control

The primary objective for odor control at the solidification/stabilization area(s) are to minimize odor generation and odor emissions. In accordance to applicable requirements of 30 TAC §330.245, the City shall prevent nuisance odors resulting from liquid waste processing from leaving the boundary of the facility. If nuisance odors are found to be passing facility boundary from liquid waste processing, the City may be required to suspend solidification/stabilization operations until additional remedial measures are employed such as:

- Additional waste handling procedures such as reducing time of exposure of liquid waste to the air,
- Increasing buffer zone from processing area to the facility property boundary,
- Using odor controlling sprays or installing misters.

2.7 Fire Protection

Activities requiring fire protection in the solidification/stabilization area(s), including small fires and equipment/vehicle fires, are outlined in Part IV §4.4, Fire Protection Plan. In summary, if a fire occurs in a liquid waste solidification basin, site personnel will attempt to extinguish the fire by smothering it with soil transported by an excavator, dump truck, bulldozer, or other on-site equipment. If appropriate for the type of material being solidified, water and/or fire extinguishers may be used to control and extinguish the fire. If a fire cannot be extinguished by on-site facility personnel, the local fire department will be contacted by telephoning 911. Facility personnel will use reasonable measures to contain the fire until the fire department arrives.

2.8 Contaminated Water

Contained spills must be promptly collected and solidified/stabilized and contaminated runoff will be pumped in a timely manner directly into either the leachate collection and removal system or the leachate force main connected to a public sewer system in accordance with Part III §4.0, Leachate Collection and Removal System.