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# PERMIT AMENDMENT APPLICATION

## PERMIT AMENDMENT APPLICATION

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

Volume 1 of 4

**Prepared For:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
Professional Engineering Firm Registration Number F-2578  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491





# PERMIT AMENDMENT APPLICATION

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Facility Name: Edinburg Regional Disposal Facility  
 MSW Authorization #: 956C  
 November 2017

Initial Submittal Date: July 2017  
 Revision Date: Administrative NOD August 2017; Revised 1st NOD

Select all that apply	Received	Pending	Not Applicable
Ocean Dumping Permits under the Marine Protection Research and Sanctuaries Act	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Dredge or Fill Permits under the CWA	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Licenses under the Texas Radiation Control Act	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Other Environmental Permits</b>			
<b>Air New Source Permit Account No. (HN0018R)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Air New Source Permit Registration (81830)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Air Operating Permits (2841)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### 12. General Facility Information

Facility Name: **Edinburg Regional Disposal Facility**  
 MSW Authorization No. (if available): **956C**  
 Regulated Entity Reference No. (if issued)\*: **RN102217734**  
 Physical or Street Address (if available): **8601 North Jasman Road**  
 City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78542**  
 (Area Code) Telephone Number: **(956) 381-5635**  
 Latitude (Degrees, Minutes Seconds): **~~N 26° 23' 53.66"~~N-26°-23'-52.4"**  
 Longitude (Degrees, Minutes Seconds): **~~W 98° 07' 48.22"~~W-98°-07'-47.2"**  
 Benchmark Elevation (above mean sea level): **84.85ft.**

Provide a description of the location of the facility with respect to known or easily identifiable landmarks: **6.7 miles north of Edinburg City Limits**

Detail access routes from the nearest United States or state highway to the facility:  
**Exit US281 onto eastbound FM2812. Turn (left) (north) at Jasman Road.**

\*If this number has not been issued for the facility, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Facility as the Regulated Entity.

### 13. Facility Type(s)

Type I                       Type IV                       Type V  
 Type I AE                       Type IV AE                       Type VI

### 14. Activities Conducted at the Facility

Storage                       Processing                       Disposal



PERMIT AMENDMENT APPLICATION

Part I

# FACILITY AND APPLICANT INFORMATION

## SUPPLEMENTARY TECHNICAL REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
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8601 North Jasman Road  
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### 1.2.2 Access Routes

30 TAC §305.59(b)(2)

The facility entrance is located at 8601 Jasman Road north of FM 2812 and is shared with the City’s Type IV Landfill TCEQ Permit MSW-2302. The access route to the facility from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Road. An additional facility access route, used only for landfill operations and maintenance vehicles as well as for emergency response vehicles from US Hwy 281, is eastbound on Encinitos Road. Figure I-1 shows access routes via major roadways to facility.

### 1.2.3 Geographic Coordinates

30 TAC §305.59(b)(3)

Geographical coordinates of the facility represented by the permanent site benchmark are:

Latitude: ~~N 26° 23' 53.66"N 26° 23' 53.33"~~  
 Longitude: ~~W 98° 07' 48.22"W 98° 07' 48.25"~~  
 Elevation: 84.85 ft-msl

The permanent site benchmark monument, a bronze marker set in concrete with the benchmark elevation and survey date stamped on it, is established in an area that is readily accessible and will not be used for disposal. The monument elevation was surveyed from a known United States Coast and Geodetic Survey benchmark. Figure I-1 shows the location of the benchmark in relation to the facility.

### 1.3 Maps

30 TAC §§305.45(a)(6), 330.59(c)(1), & 330.59(c)(2)

**Table I-1: Maps**

Figure	Title	Citation
I-1	Facility Location Map	30 TAC §330.59(c)(1)
I-2	TxDOT County Map	30 TAC §330.59(c)(2)
I-3	USGS Topographic Map	30 TAC §305.45(a)(6)(A)
I-4	Land Use Map	30 TAC §305.45(a)(6)(B)
I-5	Land Ownership Map	30 TAC §305.45(a)(6)(D) & §330.59(c)(3)(A)
<del>1-6</del>	<del>Facility Layout Map</del>	<del>30 TAC §305.45(a)(6)</del>

- Note: 1. No storm water intake or discharge structures are located within facility according to Part III2, Surface Water Drainage Report.
2. ~~Structures associated with the facility's disposal activities including an outline of the solid waste management units, interior road, and surface water drainage features as well as entrance facility structures including gatehouse and scales, office, maintenance buildings, and entrance road are depicted on Figure I-6.~~
- ~~23.~~ All waste disposal activities conducted on the tract are included in this application.

and the rate of waste disposal could reach approximately 1,625,000 tons per year. The total disposal capacity and site life calculations are provided in Part III3A, Volume and Site Life Calculations.

<b>Table I-6: Permit Condition Comparison</b>	<b>TCEQ Permit MSW-956B</b>	<b>TCEQ Permit MSW-956C</b>
Permitted Area (acre)	253.5	602.5
Waste Disposal Unit Area (acre)	192.9	406.0
Buffer/Other Area (acre)	60.6	196.5
Remaining Capacity (cubic yards)	5,738,691	81,562,465 76,304,934
Remaining Projected Site Life (years)	8 years	64 years
Maximum Elevation (ft-msl)	213	398
Elevation of Deepest Excavation (ft-msl)	70	70

Refer to Figure I-5

### 2.3 Properties of Waste

30 TAC §305.45(a)(8)(B)(ii)

Waste authorized for acceptance at the facility in accordance with Part II, Waste Acceptance Plan will be appropriate for a Type I municipal solid waste disposal facility and will not have constituents or characteristics that will negatively impact or influence the design and operation of the facility.

### 2.4 Other Information

30 TAC §305.45(a)(8)(C)

Both the Edinburg Regional Disposal Facility, TCEQ Permit MSW-956B, and the Type IV Landfill, TCEQ Permit MSW-2302, share a common entrance and certain facilities and equipment. Existing structures/areas located at the facility, which will remain as part of this permit amendment application, include:

- Landfill administrative office
- Gatehouse and scales
- Citizen collection station
- Landfill gas to energy facility including landfill flare and blower
- Reusable material staging area
- Large item salvage and white goods storage area
- Fuel storage tank

**APPENDIX IA1**

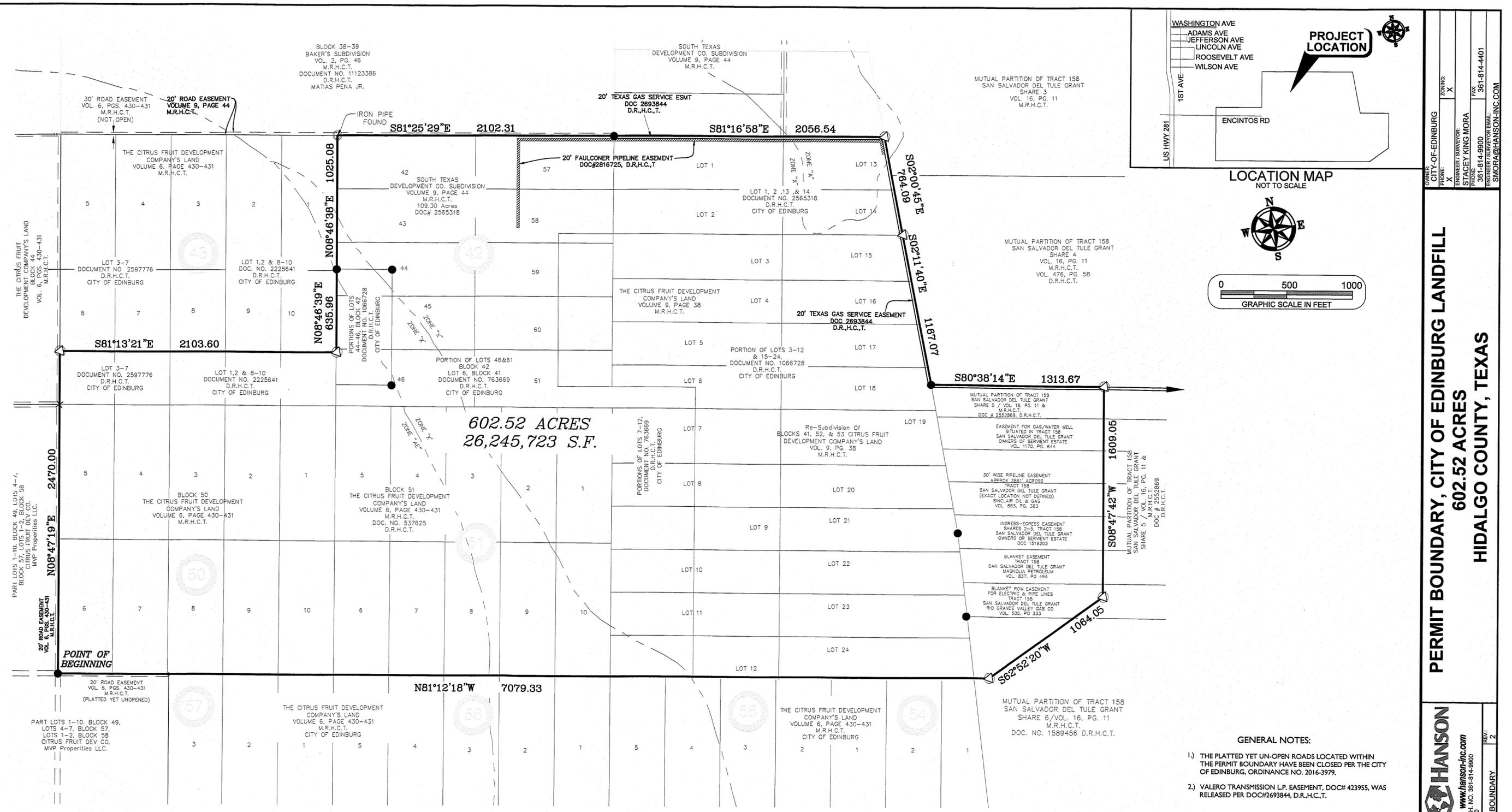
**OWNERSHIP RECORDS**

**APPENDIX IA3**

**PERMIT BOUNDARY METES AND BOUNDS LEGAL DESCRIPTION**

**APPENDIX IA4**

**PERMIT BOUNDARY METES AND BOUNDS EXHIBIT**



I, Stacey King Mora, Registered Professional Land Surveyor, hereby certify that this survey map was prepared from an actual on the ground survey made under my direction and supervision, and represents the facts found at the time of survey, and that this survey substantially complies with the current standards adopted by the Texas Board of Professional Land Surveying.

*Stacey King Mora*  
 Stacey King Mora  
 Registered Professional Land Surveyor  
 Texas Registration No. 6166



Naismith/Hanson Professional Services Inc.  
 Date: June 24, 2017

- CALCULATED CORNER
- IRON PIPE FOUND
- 5/8" IRON ROD FOUND
- COTTON SPINDLE FOUND

- GENERAL NOTES:**
- THE PLATTED YET UN-OPEN ROADS LOCATED WITHIN THE PERMIT BOUNDARY HAVE BEEN CLOSED PER THE CITY OF EDINBURG, ORDINANCE NO. 2016-3979.
  - VALERO TRANSMISSION LP. EASEMENT, DOC# 423955, WAS RELEASED PER DOC#2693844, D.R.H.C.T.
  - SINCLAIR OIL & GAS EASEMENT, DOC# 5798, VOLUME 886, PG 207 WAS RELEASED PER DOC#2824216, D.R.H.C.T.
  - ALL BEARINGS ARE GRID BEARING BASED ON THE TEXAS COORDINATE SYSTEM FOR THE LAMBERT SOUTH ZONE NAD 1983
  - SOME OBJECTS MAY BE DRAWN OUT OF SCALE FOR CLARITY.
  - A METES A BOUNDS DESCRIPTION DATED MARCH 4, 2016 TO ACCOMPANY THIS SURVEY.
  - PER FLOOD INSURANCE RATE MAP COMMUNITY-PANEL NUMBER 480334 0325 D, MAP REVISED JUNE 6, 2000, THE SUBJECT PROPERTY IS LOCATED PARTIALLY IN ZONES:
    - "A" AND "AE", DEFINED AS "SPECIAL FLOOD HAZARD AREAS INUNDTATED BY 100-YEAR FLOOD";
    - "X" - OTHER FLOOD AREAS, DEFINED AS "AREAS OF 500-YEAR FLOOD; AREAS OF 100-YEAR FLOOD WITH AVERAGE DEPTHS OF LESS THAN 1 FOOT OR WITH DRAINAGE AREAS LESS THAN 1 SQUARE MILE; AND AREAS PROTECTED BY LEVEES FROM 100-YEAR FLOOD";
    - "X" - OTHER AREAS, DEFINED AS "AREAS DETERMINED TO BE OUTSIDE 500-YEAR FLOODPLAIN"
- THIS STATEMENT SHALL NOT CREATE LIABILITY ON THE PART OF THE SURVEYOR.

**PERMIT BOUNDARY, CITY OF EDINBURG LANDFILL**  
**602.52 ACRES**  
**HIDALGO COUNTY, TEXAS**

OWNER: CITY OF EDINBURG  
 PHONE: X  
 ZONING: X  
 ENGINEER/SURVEYOR: STACEY KING MORA  
 PH: 361-814-9900  
 FAX: 361-814-4401  
 ENGINEER/SURVEYOR EMAIL: SMORA@HANSON-INC.COM

**HANSON**  
 www.hanson-inc.com  
 PH. NO. 361-814-9900

**Naismith/Hanson**  
 Engineering | Planning | Architecture | Allied Services  
 Now part of Hanson Professional Services Inc.  
 4501 GOLLHAR RD., CORPUS CHRISTI, TEXAS 78411  
 TSP# FIRM #655  
 PROJECT NO: 17030000  
 SURVEY DATE: 06/23/2017  
 SHEET: 2 OF 2

DATE: 06/23/2017  
 TIME: 10:53:09  
 PROJECT: PERMIT BOUNDARY

**APPENDIX IA5**

**PROPERTY OWNER AFFIDAVIT**



**PROPERTY OWNER'S AFFIDAVIT**

I, Richard M. Hinojosa, as City Manager, as authorized signatory for City of Edinburg, acknowledge on behalf of City of Edinburg, the owner of record of the property herein described:

The permit boundary for TCEQ Permit MSW-956C, a 602.52 acre tract of land comprised of Lots 42-46 & 57-61, Block 42, South Texas Development Company Subdivision Hidalgo County, Texas, and Lots 1-24, Citrus Fruit Development Company's Land, Hidalgo County, Texas, Lots 1-10, Block 51, Lots 1-10, Block 50, and a portion of Lots 6-10, Block 43, all being of the Citrus Fruit Development Company's Land, Share 5 & 6, of the Mutual Partition of Tract 158, San Salvador Del Tule Grant, , Hidalgo County, Texas."

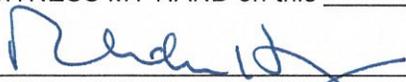
I acknowledge that City of Edinburg is applying for authorization to horizontally and vertically expand the existing municipal solid waste landfill facility under permit amendment application TCEQ Permit MSW-956C upon such property.

I acknowledge on behalf of City of Edinburg, that the State of Texas may hold the City of Edinburg either jointly or severally responsible for the operation, maintenance, closure, and ay required post-closure care of the site and facility.

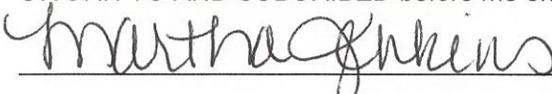
I acknowledge on behalf of City of Edinburg, that it has responsibility to file with the deed records of Hidalgo County, an affidavit to the public advising that the Site has been used for a solid waste facility, prior to the time the Site begins operating as a municipal solid waste landfill facility, and to file a final recording upon completion of disposal operations and closure of the landfill units at the municipal solid waste facility in accordance with 30 TAC §330.19.

I acknowledge on behalf of City of Edinburg, the requirement that owner or operator of the Site and the State of Texas shall have access to the property described herein during the active life and post-closure care of the municipal solid waste facility for the purpose of inspection and maintenances.

WITNESS MY HAND on this 10<sup>th</sup> day of October, 2017.

  
Richard M. Hinojosa, City Manager

SWORN TO AND SUBSCRIBED before me on this 10<sup>th</sup> day of October, 2017.

 For Hidalgo County, Texas

Notary Public

My Commission Expires: 7/15/18





PERMIT AMENDMENT APPLICATION

Part II

# WASTE ACCEPTANCE PLAN, EXISTING CONDITIONS SUMMARY, AND FACILITY LAYOUT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

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## 1.2 Waste Parametric Limitations

30 TAC §330.61(b)(1)

Waste accepted at the facility will not have constituent concentrations or characteristics that will adversely impact or influence the design and operation of the facility. Special wastes accepted at the facility will meet the provisions of 30 TAC §330.171 and criteria outlined in Part IVH, Special Waste Acceptance Plan, including the waste management procedures set forth in Part IV, Appendix H-1, [Waste Specific Special Waste Management Procedures](#).

## 1.3 Waste Source Generation

30 TAC §330.61(b)(1)(A)

The facility serves individuals, businesses, and communities in the Lower Rio Grande Valley, including the City of Edinburg and Hidalgo, Starr, Books, Kennedy, Willacy, and Cameron Counties. According to the Regional Solid Waste Management Plan Amendment developed by the Lower Rio Grande Valley Development Council, the waste types and percentage by weight are as follows.

**Table II-2: Lower Rio Grande Valley Waste Characteristics**

Types of Waste	Percentage	Description
Residential	40.73%	Durable goods - appliances and furniture Non-durable goods - papers, disposable diapers, clothing & footwear Containers and packaging Food wastes and yard wastes
Commercial	14.15%	Commercial waste - cardboard, office papers, food, disposable dinnerware, and other waste products. Disaster waste is included in this category.
Contaminated Soil	12.9%	Generated during remediation of spill sites, often in conjunction with removal of underground storage tanks.
Class II & Class III	10.8%	Waste imported from Mexico - A sub-category of industrial waste
C & D Waste	7.6%	Wastes resulting from construction and demolition processes
Brush	5.9%	Trees, shrubs and other yard waste debris
Institutional	3.93%	Institutional waste (schools, nursing homes and hospitals) generally considered the same as commercial waste.
Recreational	2.95%	Waste generated at parks and other recreational facilities.
Sludge	0.6%	Sludge from water and wastewater treatment plants and also septage (pumped from septic tanks) and grease and grit trap waste.
Class I Asbestos	0.44%	Asbestos generated during construction demolition or removal of asbestos from existing buildings and readily releases airborne particles.
Litter/Dumping	.006%	Waste generated by promiscuous dumping along road ways and other areas
Asbestos	.06%	Asbestos generated construction demolition or removal of asbestos from existing buildings and does not readily release airborne particles.

## **2.2.2 Compatibility with Surrounding Land Use, Zoning, Community Growth Patterns**

30 TAC §330.61(h)

Sections 2.3 discusses site-specific land use characterization including surrounding land use, zoning in the vicinity, community growth patterns, and proximity to residents and other uses. As documented, the MSW facility is compatible with the surrounding area.

## **2.3 Land Use Characterization**

### **2.3.1 Land Use Map**

30 TAC §330.61(g)

Figure II-4, Land Use Map is a constructed map showing the facility boundary and land uses within 1 mile such as commercial, industrial, residential, recreational, institutional, and open areas used for agricultural, pastureland, or roadways. The map shows the location of approximately 972 residences, sixty commercial and industrial businesses, a school, a licensed daycare facility, four churches, a cemetery, and a recreational area within 1 mile of the facility boundary. There are no ponds or lakes, hospitals, or historic structures and sites within 1 mile of the facility boundary.

Any existing zoning on or surrounding the property is shown on Figure II-5, Zoning Map and any drainage, pipeline, and utility easements within the facility are shown on Figure II-6, Drainage, Pipeline, and Utility Easement Location Map. Access roads serving the facility are shown on the [Figure II-4, Land Use Map](#) and Figure II-11, Traffic Volumes.

### **2.3.2 Zoning Map**

30 TAC §330.61(h)(1)

Figure II-5, Zoning Map shows the City's Official Zoning Map dated June 16, 2015 within 2 miles of the facility as well as property recently annexed by the City. The facility is located with the City of Edinburg limits zoned for industrial land use.

### **2.3.3 Drainage, Pipeline, and Utility Easement Location Map**

30 TAC §330.61(c)(10)

Figure II-6, Drainage, Pipeline, and Utility Easement Location Map shows two deed recorded dedicated pipeline easements within and adjacent to the facility property. Deed records for both pipeline easements are located in Appendix IA, Legal Description. One 20-foot wide pipeline easement, owned by Texas Gas Services, runs adjacent to the eastern and northern facility property boundary. Another 20-foot wide pipeline easement, owned by Vernon E. Faulconer, Inc. (VEFI), runs adjacent to the Texas Gas Services pipeline

along northern property boundary and continues south to the gas production well located approximately 675 feet from the north property boundary as shown on Figure II-6.

Electrical powerlines owned by Magic Valley Electric Cooperative currently run from the intersection of Encinitos Road and the west property boundary a distance of approximately 2,000 feet south along the west permit boundary and extend approximately 5,000 feet east. Another electrical powerline owned by American Electric Power is located adjacent to the entrance road into the facility. Both powerlines are not constructed on dedicated easements and may be relocated if necessary for future site development.

A City owned sanitary sewer line currently runs from the intersection of Encinitos Road and the west property boundary and extends approximately 1,900 feet east. Another City owned sanitary sewer line is located adjacent to the entrance road into the facility. Neither sewer line is constructed on dedicated easements and may be relocated if necessary for future site development.

No drainage easements are located within the facility.

### **2.3.4 Character of Surrounding Land Use**

30 TAC §330.61(h)(2)

Information about the character of surrounding land uses within 1 mile of the facility is depicted on Figure II-4, Land Use Map. Portions of land are developed with a wide variety uses such as commercial, industrial, residential, recreational, institutional, and open areas used for agricultural, pastureland, or roadways. A breakdown of land use type and corresponding areas is summarized in Table II-5, [Land Use within One Mile](#).

**Table II-5: Land Use within One Mile**

Land Use	Area in Acres	Percentage of Total Area
Open	2,773	52.4%
Industrial	1,554	29.3%
Residential	779	14.7%
Commercial	86	1.6%
Institutional	83	1.6%
Recreational	19	0.4%
Total	5,294	100.0%

### **2.3.5 Growth Trends**

30 TAC §330.61(h)(3)

Information about growth trends within 5 miles of the facility with directions of major development is evaluated by area population projections, inspection of a series of aerial photographs, and local planning studies.

#### **2.3.5.1 Population Projections**

Population projection data is provided by Texas State Data Center (TSDC) Office of the State Demographer county level population projections. Such projections are based on recent and projected demographic trends, including the birth rates, survival rates, and net migration rates of population groups defined by age, gender and ethnicity. The TSDC strongly recommends use of their half migration scenario for long-term planning. Population projections for the facility's current market areas are presented in Table II-6, [Population Projections and Annual Growth Rates by County](#). The average annual growth rate for Hidalgo County is 1.75 percent.

located on the southern boundary of the facility west of the entrance road. The flare station located directly north of the LFGTF on facility property may be moved for future site development to a location within the LFGTF permit boundary. The unused container storage pad and storage building will be removed as operational development progresses.

### **2.3.9 Prevailing Wind Direction**

30 TAC §330.61(c)(1)

A wind rose is included as Figure II-10, Wind Rose to illustrate the prevailing wind direction for the Brownsville Airport located approximately 50 miles southeast for the period January 1, 1984 to December 31, 1992. The prevailing wind direction is from the south and southeast with a strength that can be greater than 21 knots. Calm winds are 5.23 percent of the time.

## **2.4 Transportation**

### **2.4.1 Traffic**

A traffic and location restrictions review and correspondence with Texas Department of Transportation (TxDOT) is included in Appendix IIA, Traffic.

#### **2.4.1.1 Access Road Availability and Adequacy**

30 TAC §330.61(i)(1)

##### **2.4.1.1.1 Access Road Availability**

The facility entrance is located at 8601 Jasman Road north of FM 2812 and is shared with the City's Type IV Landfill, TCEQ Permit MSW-2302. The access route from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Rd. An additional facility access route used only for landfill operations and maintenance vehicles as well as for emergency response vehicles from US Hwy 281 is eastbound Encinitos Rd. Figure II-11, Traffic Volume shows the access roads to facility.

##### **2.4.1.1.2 Access Road Adequacy**

Access road adequacy for US Hwy 281 and FM 2812, as provided by TxDOT, and a summary of their characteristics is presented in Table II-7, [Access Road Characteristics](#). The portion of Jasman Rd located north of FM 2812 is owned, operated, and maintained by the City.

**Table II-7: Access Road Characteristics**

Access Road	Maximum Weight (Pounds)	Number of Lanes <sup>1</sup>	Width of Lanes (ft)	Curb/Shoulders <sup>2</sup>	Surface Type
US Hwy 281 <sup>3</sup>	80,000	4	12	5 to 10-ft shoulder	Asphaltic concrete Pavement surface overlaying a limed caliche base
FM 2812 <sup>4</sup>	80,000	2 <sup>4</sup>	12	~10-ft shoulder	Asphaltic concrete Pavement surface overlaying a limed caliche base

1. The number of lanes represent the total in both directions.
2. Curb and shoulder exist in both directions.
3. Near the intersection with FM 2812, US Hwy 281 northbound frontage road has three 12-foot wide lanes.
4. For a distance of approximately 500 foot on the eastern side of the intersection with US Hwy 281, FM 2812 has four 12-foot wide lanes.

#### 2.4.1.2 Volume of Vehicular Traffic

30 TAC §330.61(i)(2)

Volume of vehicular traffic on access roads within 1 mile of the proposed facility, both existing and future, during the expected life of the proposed facility is summarized in Table II-8, Volume of Vehicular Traffic and presented on Figure II-11, Traffic Volume. The expected life is estimated at 60 years with a 2 percent annual growth rate.

**Table II-8: Volume of Vehicular Traffic**

Access Road	Location	Existing Annual Average Daily Traffic	Future Annual Average Daily Traffic
US Hwy 281	North of FM 2812 intersection	18,954 VPD	667,605 VPD
US Hwy 281	South of FM 2812 intersection	32,674 VPD	1,150,856 VPD
FM 2812	West of Jasman Road intersection	9,610 VPD	58,286 VPD
FM 2812	East of Jasman Road intersection	8,420 VPD	51,069 VPD

#### 2.4.1.3 Facility Traffic Volume

30 TAC §330.61(i)(3)

Volume of vehicular traffic expected to be generated by the facility on access roads within 1 mile of the proposed facility summarized in Table II-9, Facility Traffic Volume and presented on Figure II-11, Traffic Volume. The expected life is estimated at 60 years with a 2 percent annual growth rate.

**Table II-9: Facility Traffic Volume**

Access Road	Location	Existing Annual Average Daily Traffic	Future Annual Average Daily Traffic
Jasman	Facility Entrance	187 VPD	763 VPD

#### 2.4.2.4    No Bird Hazards

30 TAC §§330.545(a) & 330.545(c)

The facility is located greater than 10,000 feet from the South Texas International Airport at Edinburg's runway end used by turbojet aircraft and greater than 5,000 feet from the Norman and White Airport's runway end used by piston-type aircraft. The facility is not located in an area where the attraction of birds can cause a significant bird hazard to low-flying aircraft, and the facility has been designed and will be operated so that the municipal solid waste landfill units do not pose a bird hazard to aircraft.

#### 2.4.2.5    Notice to Airports and FAA

30 TAC §330.545(b)

In addition to the FAA, notification of the proposed landfill expansion was submitted to the South Texas International Airport at Edinburg and Norman and White Airport.

### **2.5    General Geology and Soils Statement**

30 TAC §330.61(j)(1)-(4)

Detailed discussion of the site geology is included in Part III4, Geology Report.

#### **2.5.1    Geology and Soils**

30 TAC §330.61(j)(1)

##### 2.5.1.1    Geology

In the Lower Rio Grande Valley (LRGV) the depositional stratigraphy described as the Gulf Coast Aquifer (GCA) are Quaternary and Neogene period sediments consisting primarily of fine to medium-grained materials deposited by fluvial and eolian processes. The outcrop of each progressively older, underlying unit is found to the west of the younger, overlying unit. Because of continental shelf differential subsidence, units typically thicken and dip toward the coastline of the Gulf of Mexico.

Figure II-12, Geologic Map presents the McAllen-Brownsville Sheet, Geologic Atlas of Texas prepared by the Bureau of Economic Geology. This map presents geologic units and structural features within the vicinity of the facility with text describing the stratigraphy and lithology of the map units. The facility is located on Neogene sediment overlain by Quaternary windblown sediment.

The generalized stratigraphic column of the area beneath the facility is presented to a depth of approximately 1,600 ft-bgs, which is the base of the Evangeline Aquifer. Based on Figure II-12, Geologic Map and Figure II-13, ~~Regional~~ Stratigraphic Cross-Section, the Goliad Formation outcrops in the vicinity and is overlain by a veneer of Holocene eolian deposits. A description of the stratigraphy, including geologic

age, lithology including variations, thickness, depth, geometry, hydraulic conductivity, and depositional facies of each geologic unit as available through current geologic information is included in Table III4-1.

**Table II-10: Stratigraphic Units Underlying Facility**

System	Series	Age (M.Y.)	Stratigraphic Units	Lithology	Approx. Thickness (ft)	Approx. Depth (ft-bgs)	Geometry	Hydraulic Conductivity	Depositional Facies
Quaternary	Holocene	0.02	Stabilized Sand Dune Deposits	Sand; Silt	0-30	10	Sand sheets and dunes	Moderate to High	Eolian
Neogene	Miocene	4.4	Upper Goliad	Clay or Mud; Sandstone; Mudstone, Carbonate, Limestone, Conglomerate	400	400	Large planar, cross bedding, and lamination.	Moderate	Fluvial / Meander belt
		11.3	Lower Goliad		550	950			Dips east towards gulf coastline; units thicken down dip
		13.3	Upper Lagarto	Sandstone	650	1600			
		15.6	Middle Lagarto	Clay or Mud	700	2300	Low		

(Table compiled after Baker, 1979; Chowdhury and Mace, 2007; and Young et al., 2010)

### 2.5.1.2 Soils

Figure II-14, Soils Map presents the distribution of six soil series, predominantly loamy, located across the facility according to the Soil Survey of Hidalgo County, Texas. These soil series include: the Brennan, Hebronville (#22, #23, and #24), Hidalgo, Racombs, and Willacy Series. Table II-11, [Soil Types](#) lists sixteen soil types within the facility boundary, percentage of area covered, and potential for water and wind erosion.

**Table II-11: Soil Types**

Soil	Unit Name	Area Covered <sup>1</sup> (%)	Water Erosion Hazard	Wind Blowing Hazard
3	Brennan fine sandy loam, 0 to 1 percent slopes	7.8	Slight	Moderate
9	Delfina loamy fine sand, warm, 0 to 2 percent slopes	4.2	Moderate	Severe
16	Hargill fine sandy loam, 0 to 1 percent slopes	9.5	Slight	Moderate
17	Hargill fine sandy loam, 1 to 3 percent slopes	6.6	Moderate	Moderate
22	Hebronville sandy loam, 0 to 1 percent slopes	7.7	Slight	Moderate

### 2.5.3 Seismic Impact Zone Assessment

30 TAC §330.61(j)(3) & §330.557

New municipal solid waste landfill units and lateral expansions shall not be located in seismic impact zones. A seismic impact zone is defined as an area with a 10-percent or greater probability that the maximum horizontal acceleration in lithified earth material, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 250 years.

The 2014 U.S. Geological Survey (USGS) National Seismic Hazard Maps display earthquake ground motions for various probability levels across the United States up to 50 years. According to the USGS, ground motion values having a 2% probability of exceedance in 50 years should be approximately the same as those having 10% probability of being exceeded in 250 years. Figure II-15, Seismic Impact ~~Zone~~ Map shows the maximum horizontal acceleration is approximately 0.02g at the location of the facility. Because the maximum horizontal acceleration is less than 0.1g, the facility is not located in a seismic impact zone.

### 2.5.4 Unstable Areas Assessment

30 TAC §§330.61(j)(4) & 330.559

An unstable area is defined to be a location that is susceptible to natural or human-induced events or forces capable of impairing the integrity of some or all of a landfill's structural components responsible for preventing releases from the landfill; unstable areas can include poor foundation conditions, areas susceptible to mass movement, and karst terrains. No unstable areas exist within the vicinity of the facility that would impair the integrity of any landfill components.

#### 2.5.4.1 Local Soil Conditions

The soils within vicinity of the facility are predominantly sandy loam and have similar soil properties. They are well drained because of high infiltration rates and lack natural drainage features. No significant differential settling is anticipated.

#### 2.5.4.2 Local Geologic or Geomorphologic Features

The lithology within the vicinity of the facility is moderately consistent and no indication of any karst conditions, active geological faulting, or presence of salt domes; therefore no differential subsidence is anticipated.

#### 2.5.4.3 Local Human-Made Features

In Part III3, Waste Management Unit Design analyses were performed to assess the performance of the landfill with respect to slope stability and settlement using very conservative assumptions. Results of the analyses indicate slope stability and long-term settlement would not impair the integrity of the landfill's

## 2.8 Floodplains

30 TAC §§330.61(m)(1) & 330.547(b)

The facility's northern boundary extends into two small unnamed ponding areas designated as a 100-yr flood zone without floodways. Construction of the facility's perimeter berm and storm water management structures—placement of fill in the 100-yr flood zone without floodways—will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment. The City of Edinburg has jurisdiction over the facility and adjacent properties and the Director of Public Works has reviewed and approved the construction of the facility's perimeter berm and storm water management structures.

### 2.8.1 Location

The facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D dated June 6, 2000 as depicted in Figure IIC-1, Flood Insurance Rate Map (FIRM). A Flood Insurance Study (FIS) and FIRM for the Unincorporated Areas of Hidalgo County, Texas, have been revised by a Letter of Map Revision (LOMR) case number 01-06-1095P dated May 17, 2001 to reflect revised hydrologic and hydraulic analyses, and more accurate topographic information. Figure IIC-2, Revised FIRM to Reflect LOMR depicts the facility's property boundary on the revised FIRM based on LOMR 01-06-1095P with revised Special Flood Hazard Areas (SFHA). The most current SFHA delineations available are FEMA Quality Level 3 (Q3) Flood Data files. Figure IIC-3, FEMA Q3 Flood Data shows the facility's northern boundary extends into two small unnamed ponding areas designated as SFHA Zone A, 100-year flood with no base flood elevations determined.

### 2.8.2 Data Source

The Facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D dated June 6, 2000, which was revised by LOMR 01-06-1095P dated May 17, 2001. The SFHA changes made by subsequent Letter of Map Changes (LMOCs) have not yet been incorporated into FEMA's National Flood Insurance Program (NFIP) National Flood Hazard Layer (NFHL) digital database and does not yet contain high resolution flood hazard mapping data for Hidalgo County. The most current SFHA delineations available for the project area are FEMA Quality Level 3 (Q3) Flood Data files as verified by FEMA.

### 2.8.3 Floodplain Evaluation

A floodplain evaluation for TCEQ Permit MSW-956B was performed using FIRM revised by a LOMR case number 01-06-1095P dated May 17, 2001 as depicted on Figure IIC-2, Revised FIRM to Reflect LOMR. Appendix IIC1, Floodplain Evaluation for TCEQ Permit MSW-956B includes floodplain correspondence in

Appendix IIC1-1 and documentation that the development of TCEQ Permit MSW-956B was certified not to violate floodplain restrictions in Appendix IIC1-2.

A floodplain evaluation was performed for the expansion property for TCEQ Permit MSW-956C as depicted in Figure IIC-3, FEMA Q3 Flood Data and a request for Conditional Letter of Map Revision Based on the Placement of Fill (CLOMR-F) was submitted to FEMA. Appendix IIC2, Floodplain Evaluation for TCEQ Permit MSW-956C Expansion Area includes Appendix IIC2-1, FEMA CLOMR-F Request which includes a detailed evaluation of proposed fill in the two SFHA Zone A areas, figures detailing facility design plan and profiles, and required documentation to demonstrate compliance with each applicable requirement of 30 TAC §§330.63(c)(2), 330.307(b), and 330.547.

As discussed in Appendix IIC2-1, FEMA CLOMR-F Request, the facility's stormwater management system will incorporate ponds with adequate capacity to hold all runoff, and there will be no offsite stormwater discharge except the insignificant runoff from the exterior slope of the access road berm. The facility perimeter berms are designed to protect deposited waste from flooding. The diversion structures route stormwater run-off to the stormwater ponds along the perimeter of the facility and the access roads prevent run-on from entering the facility.

As detailed in Appendix IIC2-1, FEMA CLOMR-F Request, FEMA's Q3 Flood Data Zone A delineation was used to determine a 100-year base flood elevation (BFE) of 86 feet above mean sea level (ft-msl) for the two small unnamed ponding areas designated (SFHA) Zone A without floodways using contour interpolation as described in FEMA's guide, Managing Floodplain Development in Approximate Zone A Areas. Figure 4 in Appendix IIC2-1, FEMA CLOMR-F Request presents Sections A and B for profile views of the northeast Zone A SFHA and northwest Zone A SFHA, respectively. Section A shows that the construction in the northeast Zone A SFHA includes the waste buttressed by a landfill perimeter berm, a facility stormwater perimeter channel, and a perimeter access road with a crest elevation of 95 ft-msl. Section B shows the waste buttressed by a landfill perimeter berm, a stormwater perimeter channel, an access road with a minimum elevation of 89 ft-msl, a stormwater pond, and a facility perimeter berm with a minimum elevation of 89 ft-msl, i.e. a 3-ft minimum freeboard is maintained above the 100-year design flood (86 ft-msl) in accordance with 30 TAC 330.307(b). ~~The Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FIRM) for Hidalgo County, Texas, Map No. 480334, Panel 0325 D, Effective Date: September 26, 2008 and Zone A Special Flood Hazard Area (SFHA) boundaries from Quality Level 3 (Q3) Flood Data provided by FEMA Online Flood Maps, the facility's northern boundary extends into two small unnamed ponding areas designated SFHA Zone A without floodways~~

~~As demonstrated in Appendix IIC2-1, FEMA CLOMR-F Request, c~~Construction of the facility's landfill perimeter berm and storm water management structures—placement of fill in the SFHA Zone A areas—

will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment.

#### **2.8.4 Construction Approval**

~~A request for Conditional Letter of Map Revision Based on the Placement of Fill (CLOMR-F) was submitted to FEMA. The submittal included a detailed discussion of proposed fill in the two SHFA Zone A areas, figures detailing facility design plan and profiles, and required documentation. Appendix IIC2-2, FEMA Response to CLOMR-F Request states FEMA responded that the proposed development does not encroach on a FEMA designated floodway and no buildings are anticipated to be constructed on the site. In addition, FEMA noted that, there are no procedures under the NFIP regulations that require action on your requests by FEMA. Hidalgo County, or other agencies having jurisdiction of the site, may have requirements that apply. The City of Edinburg has jurisdiction over the facility and adjacent properties. The Director of Public Works reviewed and approved the request for CLOMR-F thus signing the Community Acknowledgement Form included in Appendix IIC2-3, Community Floodplain Management Review and Approval; therefore, no further action is required.~~

~~The CLOMR-F request submittal including the signed Community Acknowledgement Form and the FEMA response letter are included in Appendix IIC, Floodplains.~~

## **2.9 Wetlands**

Appendix IID, Wetlands includes a wetlands evaluation and correspondence with the Department of Army, US Army Corps of Engineers (USACE).

### **2.9.1 Wetlands Determination**

30 TAC §330.61(m)(2)

Appendix IID1, Wetlands Evaluation is a wetlands assessment for the facility's expansion area conducted by Naismith Engineering, Inc. (NEI) under applicable federal, state, and local laws. The assessment was conducted to determine if existing water features within the facility's expansion area meet federal 33 CFR §328.3(c)(4) and state 30 TAC §307.3(84) criteria for wetlands, and if any jurisdictional "waters of the US" are within the expansion area. Under the federal Clean Water Act § 404 (CWA § 404), the USACE regulates the discharge of dredged and fill material into "waters of the US". The phrase "waters of the US" defines the extent of the USACE's geographic jurisdiction of the CWA § 404. There are no known local laws or ordinances that would regulate or otherwise apply to wetlands within the proposed expansion area.

The wetlands assessment identified a potential wetland meeting the criteria of hydrology, vegetation, and hydric soils and performed a wetland delineation. The delineated isolated wetland is approximately 1/3 acre in size and located in the middle of the facility's expansion area. According to the wetlands assessment,

- (5) any other graphic representations or marginal explanatory notes necessary to communicate the proposed construction sequence of the facility
- (6) fencing
- (7) provisions for the maintenance of any natural windbreaks, such as greenbelts, where they will improve the appearance and operation of the facility and, where appropriate, plans for screening the facility from public view
- (8) all site entrance roads from public access roads
- (9) for landfill units
  - (A) sectors with appropriate notations to communicate the types of wastes to be disposed of in individual sectors
  - (B) the general sequence of filling operations
  - (C) sequence of excavation and filling
  - (D) dimensions of cells or trenches
  - (E) maximum waste elevations and final cover.

### 3.3 Facility Entrance Plan

The facility entrance and maintenance facilities are located south of the Type I disposal areas. Figure II-16, Facility Entrance Plan illustrates existing facility buildings and designated areas, existing fencing and screening, and site entrance roads.

#### 3.3.1 Facility Buildings

30 TAC §330.61(d)(4)

Existing structures/areas located at the facility, which will remain as part of this permit amendment application, include:

- Landfill administrative office
- Maintenance buildings
- Gatehouse and scales
- Dumpster / roll off box storage area
- Citizen collection station
- Landfill gas to energy facility including landfill flare and blower
- Reusable material staging area
- Large item salvage and white goods storage area
- Fuel storage tank

#### 3.3.2 Fencing

30 TAC §§330.61(d)(6) & 330.223(c)

~~Currently, fencing has been installed along the southern boundary of Type IV Landfill TCEQ Permit MSW-2302 and facility entrance, along the west side of the facility entrance, along the southern facility boundary from the site entrance to the west facility boundary, and along the west facility boundary as shown on Figure II-16, Facility Entrance Plan. The northern and eastern portions of the facility boundary are adjacent to City~~

~~owned property where the land use is primarily agricultural and the southern portion is adjacent to Type IV Landfill, TCEQ Permit MSW-2302, hence providing adequate control to public access. However, fencing will be incrementally installed along the northern facility boundary and east of the facility on City owned property to provide an additional barrier to control public access. Access to the facility is controlled by a perimeter fence, a composite of either a four-foot barbed wire fence or a six-foot steel-link mesh fence, 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.~~

A gate located at the facility entrance is locked by site personnel at the end of the day's operations. Another gate is located on the west side of the facility on Encinitos Road and is locked unless access is needed by site personnel.

### 3.3.3 Screening

30 TAC §330.61(d)(7)

Although there exist some visual screening of the along the southern portion of the facility boundaries, plans for screening the facility from public view is not required because the nearest high traffic roadway is located approximately 1,900 feet to the west and surrounding land use is primarily agricultural and industrial.

### 3.3.4 Site Entrance Roads

30 TAC §330.61(d)(8)

The facility entrance is located at 8601 Jasman Rd north of FM 2812 and is shared with the City's Type IV Landfill TCEQ Permit MSW-2302. Access to the facility entrance from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Rd. The site entrance of the facility is on its southern permit boundary directly north of the scale house as shown on Figure II-16, Facility Entrance Plan

## 3.4 Facility Layout Plan

30 TAC §330.61(d)(9)(A)

Figure II-17, Facility Layout Plan illustrates an outline of the solid waste management units to receive waste accepted by facility as outlined in §1.0, Waste Acceptance Plan; general locations of main interior facility roadways that can be used to provide access to fills areas; surface water drainage features and ponds;

buffer zones; and location of monitoring wells. Figure II-17, [Facility Layout Plan](#) includes the location of the permanent site benchmark.

### **3.4.1 Outline of Solid Waste Management Units**

30 TAC §330.61(d)(1)

Figure II-17, Facility Layout Plan illustrates an outline of the solid waste management units. Waste within Pre-Subtitle D Units 1-4 will either be relocated for development of Unit 8 or an Overliner will be constructed for vertical expansion. Therefore, Subtitle D waste disposal areas are 52.9 acres in Unit 5, 110.8 acres in Unit 6, 205.7 acres in Unit 7, and 36.6 acres in Unit 8/Overliner.

### **3.4.2 Interior Facility Roadways**

30 TAC §330.61(d)(2)

The facility has interior roadways that can be used to provide access to the solid waste management units as shown on Figure II-17, Facility Layout Plan.

### **3.4.3 Monitoring Wells**

30 TAC §330.61(d)(3)

Figure II-17, Facility Layout Plan shows the location of 38 monitoring wells used for the groundwater monitoring system outlined in Part III5, Groundwater Characterization Report.

### **3.5 Subgrade Layout Plan**

30 TAC §330.61(d)(9)(D)

Currently active disposal areas are Unit 5, Cells SD-1 through SD-8 and Unit 6, Cells 1A through 6A. Figure II-18A, Subgrade Layout Plan – Overliner Option, depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Overliner and lists their approximate dimensions. Likewise Figure II-18B, Subgrade Layout Plan –Unit 8 Option, depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Unit 8 and lists their approximate dimensions. Cells may be divided into smaller areas for development. Resulting divisions will be labeled with parent cell designation appended with an incremental letter.

### **3.6 Final Contour Map**

30 TAC §330.61(d)(9)(E)

Figure II-19, Final Contour Map depicts the maximum final cover elevation of approximately 398 ft-msl. The maximum waste elevation is the final cover elevation minus the thickness of final cover and is dependent on thickness of the final cover lining option used. Part III7, Closure Plan details final cover lining options.

**APPENDIX IIC1**

**Floodplain Evaluation for TCEQ Permit MSW-956B**

**APPENDIX IIC1-1**

**FLOODPLAIN CORRESPONDENCE FOR TCEQ PERMIT MSW-956B**

**APPENDIX IIC1-2**

**Floodplain Location Restriction Certification for TCEQ Permit MSW-956B**

**APPENDIX IIC2**

**FEMA RESPONSE FLOODPLAIN EVALUATION FOR TCEQ PERMIT MSW-956C EXPANSION  
AREA**

**APPENDIX IIC2-1**  
**FEMA CLOMR-F REQUEST**

**APPENDIX IIC2-2**  
**FEMA RESPONSE TO CLOMR-F REQUEST**

**APPENDIX IIC2-3**

**COMMUNITY FLOODPLAIN MANAGEMENT REVIEW AND APPROVAL**

**APPENDIX IIE2-3**  
**TPWD RESPONSE TO RECOMMENDATIONS**

## Crowe, Kelly

---

**To:** Russell Hooten  
**Subject:** RE: Threatened or Endangered Species Review

---

**From:** Russell Hooten [<mailto:Russell.Hooten@tpwd.texas.gov>]  
**Sent:** Wednesday, October 25, 2017 2:14 PM  
**To:** Crowe, Kelly <[Kelly\\_Crowe@golder.com](mailto:Kelly_Crowe@golder.com)>  
**Subject:** RE: Threatened or Endangered Species Review

Hi Kelly,

Yes, I did review it. Overall, TPWD is OK with the responses to our recommendations.

The letter to me indicates that there was an attachment, a letter from Ernesto Reyes dated October 20, 2015. I did not receive that attachment. Could you forward that to me so our records for this project can be complete?

Thank you,  
Russell



PERMIT AMENDMENT APPLICATION

Part III

# SITE DEVELOPMENT PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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Attachment 2	Surface Water Drainage Report
Attachment 3	Waste Management Unit Design
Attachment 4	Geology Report
Attachment 5	Groundwater Characterization and Monitoring <u>Report</u>
Attachment 6	Landfill Gas Management Plan
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Attachment 9	Closure and Post Closure Cost Estimates <u>s</u>



PERMIT AMENDMENT APPLICATION

Part III, Attachment 1

# GENERAL FACILITY DESIGN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78541 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



## 1.0 GENERAL FACILITY DESIGN

### 1.1 Facility Access

30 TAC §§330.63(b)(1) & 330.223(c)

The facility shares and entrance with Type IV Landfill TCEQ Permit MSW-2302 where access to the facility is controlled by a perimeter fence, a composite of either a four-foot barbed wire fence or a six-foot steel-link mesh fence, 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. ~~fencing has been installed along its southern boundary to provide continuous security and access control.~~ A gate located at the facility entrance is locked by site personnel at the end of the day's operations. Another gate is located on the west side of the facility on Encinitos Road and is locked unless access is needed by site personnel. ~~Additional fencing is not required because the surrounding land use is primarily agricultural and industrial.~~

### 1.2 Waste Movement

30 TAC §330.63(b)(2)

Figure III1-1, Waste Movement Flow Diagram and Figure III1-2, Schematic View of Various Waste Disposal, Processing, and Storage Areas illustrate a generalized process design and working plan of the overall facility.

#### 1.2.1 Flow Diagram

30 TAC §330.63(b)(2)(A)

Figure III1-1, Waste Movement Flow Diagram is a flow diagram illustrating storage, processing, and disposal sequences for the types of waste accepted in accordance to Part II, §1.0 Waste Acceptance Plan.

#### 1.2.2 Schematic View Drawings

30 TAC §330.63(b)(2)(B)

Figure III1-2, Schematic View of Various Waste Disposal, Processing, and Storage Areas is a schematic view showing the various phases of collection, separation, processing, and disposal for the types of waste accepted in accordance to the Part II, §1.0 Waste Acceptance Plan. Structures/areas for the gatehouse and scales, citizen collection station, reusable material staging area, and large item salvage and white good storage area is located with the permit boundary of Type IV Landfill TCEQ Permit MSW-2302.

### 1.2.3 Ventilation and Odor Control

30 TAC §330.63(b)(2)(C)

The facility will follow measures outlined in Part IV, Site Operating Plan §4.14, Odor Management Plan for all storage, separation, processing, and disposal units.

### 1.2.4 Generalized Construction and Design Details

#### 1.2.4.1 Storage and Processing

30 TAC §330.63(b)(2)(D)

Roll-off waste containers are used for temporary storage for citizen collection, reusable materials, and large item salvage. Roll-off waste containers are prefabricated to industry standards, therefore generalized construction details are not required.

#### 1.2.4.2 Storage and Processing Component Slab and Subsurface Supports

30 TAC §330.63(b)(2)(E)

The foundation of designated areas for citizen collection, reusable materials, and large item salvage as depicted in Figure III1-2, Schematic View of Various Waste Disposal, Processing, and Storage Areas are maintained; no slab and subsurface supports for roll-off waste containers are required.

#### 1.2.4.3 Storage and Processing Component Containment Dikes or Walls

30 TAC §330.63(b)(2)(F)

All storm water is contained within the facility boundary as well as within the Type IV Landfill TCEQ Permit MSW-2302 boundary with no discharge into surface water in the state as a result of any storm event; therefore containment dikes or walls are not required to enclose all storage and processing components and all loading and unloading areas.

## 1.3 Endangered Species

30 TAC §330.63(b)(5)

In response to Texas Parks and Wildlife Department (TPWD) recommendations, the facility will employ best management practices to minimize potential negative impacts to federally-listed and state-listed wildlife to include a “no kill” policy. In addition, the City of Edinburg (City) made an agreement with United States Fish and Wildlife Service (USFWS) to preserve a 200-foot wide corridor of dense native woodland along the northern property boundary established with native vegetation, connecting to the southern property boundary of dense native woodland owned by the City. The facility is designed with the following features to protect endangered species:

- Perimeter fencing, a composite of either a four-foot barbed wire fence or a six-foot chain-link fence, is currently installed around contiguous properties owned by the City. Any four-foot barbed wire fence along the perimeter will be replaced with a six-foot steel-link mesh fence designed to inhibit wildlife from entering project areas.
- Excavations and embankments are to be constructed with side slopes no steeper than 3 feet horizontal to 1 foot vertical to provide an adequate escape for wildlife.

Please refer to Part IIE, Endangered or Threatened Species for response to TPWD recommendations and agreement with USFWS.



PERMIT AMENDMENT APPLICATION

Part III, Attachment 2

# SURFACE WATER DRAINAGE REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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work and local regulations. Selected hydrologic methods and input parameters are presented in Appendix III2A, Detailed Drainage Calculations.

### 2.1.3 Peak Flow Rates and Runoff Volumes

30 TAC §330.63(c)(1)(D)

The HEC-HMS hydrologic model was used to determine the peak flows and volumes resulting from the 25-year, 24-hour design storm. The NRCS unit hydrograph transformation methodology was used for all drainage basins. Times of concentrations were calculated using TR-55 methodology. Peak flow rates were used to design stormwater channels required in the drainage design (perimeter channels, downchutes, and add-on berms). Channel calculations were performed using a spreadsheet that solves Manning's equation for normal depth. Culvert sizing calculations were carried out using HY-8 software developed by the U. S. Department of Transportation Federal Highway Administration. Peak flow rates and runoff volumes are included in Appendix III2A, Detailed Drainage Calculations.

## 2.2 Drainage Pattern Analyses

30 TAC §§330.63(c)(1)(C), 330.63(c)(1) (D)(iii) & 330.305(a)

Existing drainage patterns will not be adversely altered as a result of the proposed landfill development as demonstrated in the comparison of peak flow rates, runoff volumes, and velocities in the pre-development and post-development conditions. Analysis points were located for the pre-development and post-development conditions to represent locations where run-on flows enter the site or runoff exits the site. The analysis points and contributing drainage areas are shown on Figure III2-1, Pre-Development Drainage Plan and Figure III2-2, Post-Development Drainage Plan.

The determination of no adverse alteration of drainage patterns is based on three factors related to discharge of surface water: 1) peak flows, 2) velocities, and 3) volumes as measured at the permit boundary. The pre-development condition at the facility has only two discharge points – one at CP-3 and one at CP-9. In addition, there is one discharge point at CP-7 where water accumulates at a depression along the permit boundary. The following bullets address these three discharge points:

- CP-3: In the pre-development condition an approximately 8-acre area drained to a depression just west of the permit boundary in this part of the site. In the post-development condition the contributing area to this discharge point is routed to an on-site stormwater pond used to manage surface water. As a result, the flow to this depression is redirected to the pond. This does not impact a receiving stream or channel downstream as there is not one. The discharge velocity decreases from a non-erosive velocity to zero, resulting in minimal change in post-development conditions related to velocity. The volume of discharge is likewise routed to the stormwater pond and does not pond in the off-site depression, and does not adversely impact existing drainage patterns because the discharge volume is lower than in pre-development conditions and has no apparent beneficial use.

- CP-9: In the pre-development condition an approximately 8-acre area drained off site to the south. The elimination of this discharge does not impact a receiving stream or channel downstream as there is not one. The discharge velocity decreases from a non-erosive velocity to zero, resulting in minimal change in post-development conditions related to velocity. The removal of the volume of discharge at this location does not adversely impact existing drainage patterns because the discharge volume is lower than in pre-development conditions and has no apparent beneficial use.
- At discharge point CP-7 there is a depression in the surface topography where runoff ponds along the permit boundary. In the pre-development condition, the contributing area for this runoff is 19.8 acres. The post-development condition reduces this contributed area to 6.3 acres, but does not alter the drainage pattern into the depression. Since the contributing area is lower, the peak flows, velocities, and volumes will all be lower and therefore do not adversely alter existing drainage patterns. There is no apparent beneficial use of the runoff at this location either, therefore the reduced runoff volume does not have any adverse alteration to the drainage patterns.

### 2.2.1 Drainage Areas

30 TAC §330.63(c)(1)(A)

The pre-development and post-development contributing areas for all analysis points were evaluated. Subbasins for the pre-development condition were delineated using the final cover grades and drainage design within approved TCEQ Permit MSW-956B and existing topography within the lateral expansion area as shown on Figure III2-1, Pre-Development Drainage Plan. Likewise, subbasins for the post-development condition were delineated using the final cover design, the stormwater conveyance structure design (add-on berms, downchutes, perimeter channels, culverts, etc.), and existing topography as shown on Figure III2-2, Post-Development Drainage Plan. As demonstrated in Table III2-1, analysis points CP-3 and CP-9 are the only relevant off-site discharge points in the pre-development condition.

**Table III2-1: Summary of Contributing Areas**

Analysis/Control Point	Contributing Area (acre)		Runoff Flow Pattern during Pre-development Conditions
	Pre-Development	Post-Development	
CP-1	19.7	0	Ponding on-site
CP-2	205.8	276.9 (total to the west ponds)	
CP-3	8.2	0	Discharges to an off-site depression adjacent to Permit Boundary
CP-4	5.9	0	Accumulate at depressions along permit boundary
CP-5	59.9	0	
CP-6	84.5	0	
CP-7	19.8	6.3	
CP-8	19.3	319.3 (total for the east ponds)	Ponding on-site
CP-9	8.3	0	Discharges off-site
CP-10	39.9	0	Ponding on-site

allowing 0.5 feet of freeboard for the design storm event. Add-on berm locations are depicted on Figure III2-2, Post-Development Drainage Plan and add-on berm details are presented on Figure III2-3, Drainage Control Details I – Channels and Berms.

### 2.3.3 Downchutes

Downchutes are designed with a maximum slope of 25 percent and are formed by side berms with an internal 2H:1V sideslopes and a design depth allowing 0.5 feet of freeboard for the design storm event. Downchute channels are lined with 60-mil textured geomembrane; however a suitable alternative to geomembrane may be used provided that the design is verified by a professional engineer. Stormwater flow from the downchutes channel through energy dissipation structures into a low water road crossing before discharging into either a perimeter channel lined with riprap or directly into a stormwater pond.

Downchute locations are depicted on Figure III2-2, Post-Development Drainage Plan. A typical detail is shown on Figure III2-4, Drainage Control Details II – Stormwater Downchute Details and Crossings along with a schedule that describes the size, slope, water elevations, flow velocity, and length for each downchute. Flowline profiles showing grades, flow rates, water surface elevations, velocities, and flowline elevations along the entire length for the downchutes are provided in Figures III2-11 through III2-13.

### 2.3.4 Culverts

Adequacy of both existing and design culverts were evaluated using the Federal Highway Administration's HY-8 Culvert Analysis software. Culvert locations are depicted on Figure III2-2, Post-Development Drainage Plan. Typical culvert details are shown on Figure III2-5, Drainage Control Details III – Culverts.

### 2.3.5 Stormwater Ponds

Stormwater is collected into 11 ponds: 7 are located west of Unit 7 and north of Units 1 – 6 designated as Ponds W1 – W7; and 4 are located east of Unit 7 designated as Ponds E1 – E4 as depicted on Figure III2-2, Post-Development Drainage Plan. Figure III2-6, Drainage Control Details IV - West Ponds and Sections and Figure III2-7, Drainage Control Details V - East Ponds and Sections show pond profiles; and Figure III2-8, Drainage Control Details VI – Pond Details provides pond dimensions and design elevations. The ponds will be constructed in a phased manner as needed to contain the stormwater runoff on-site as dictated by the extent of landfill development. The stormwater ponds will be lined with 60-mil HDPE in accordance with Part III3F, Liner Quality Control Plan. Hydrostatic uplift of the stormwater pond liner is not anticipated because the pond liner is above seasonal high groundwater levels.

Based on the runoff volume of the receiving areas, the ponds will be interconnected via equalization pipes as follows: Ponds W1 through W3 will be equalized; Ponds W4 through W6 will be equalized; and Ponds E1, E2, E3, and E4 will be equalized. The estimated maximum water elevations for design storm event in feet above mean sea level (ft-msl) are summarized in Table III2-3. Comparison of the maximum water

elevations in the ponds and the pond crest elevations demonstrates that the ponds have sufficient storage capacity and freeboards ranging from approximately of 5 feet to over 10 feet. Such design ensures the ponds have adequate capacity for more severe storms or consecutive storms. The designed ponds have adequate capacity to contain runoffs from two consecutive 25-year 24-hour storms as shown in Table III2-4. Furthermore, Ponds W7 and E3 are not required for the design storm event, rather they are designed as a contingency to provide additional storage capacity in case of extreme weather conditions. Pond W7 may be equalized with Ponds W4 through W6 when needed or may be utilized by pumping stormwater from other ponds under extreme weather conditions.

**Table III2-3: Pond Water Elevations for 25-Year, 24-Hour Storm**

Pond	Runoff Volume (ac-ft)	Maximum Pond Water El. (ft-msl)	Minimum Elev.of the Pond Levee (ft-msl)	Pond Freeboard (ft)
	25-year 24-hour storm	25-year 24-hour storm	-	25-year 24-hour storm
W1	29.2	85.1	91.0	5.9
W2	37.0	85.1	91.0	5.9
W3	6.5	85.1	91.0	5.9
W4	7.1	84.3	91.0	6.7
W5	7.1	84.3	91.0	6.7
W6	70.2	84.3	91.0	6.7
W7	7.8	78.5	91.0	12.5
E1	80.9	<del>82.0</del> 77.4	94.0	<del>12.0</del> 16.6
E2	87.2	<del>82.0</del> 77.4	94.0	<del>12.0</del> 16.6
E3	11.1	<del>66.6</del> 77.4	94.0	<del>27.4</del> 16.6
E4	8.5	<del>82.0</del> 77.4	94.0	<del>12.0</del> 16.6

**Table III2-4: Pond Storage Capacity Vs. Two 25-Year, 24-Hour Storms**

Pond	Runoff Volume (ac-ft)	Pond Storage Capacity (ac-ft)	Adequate Capacity to Contain Runoffs from Two 25-year 24-hour Storms?
	Two 25-year 24-hour Storms	-	
W1 through W3	146	220	YES
W4 through W6	170	283	YES
E1 through E4	374	882	YES

The semi-arid climate at the site allows for the evaporation pond design. The majority of the water in the ponds will evaporate, while a smaller portion will be used for site operations such as dust control. According

to the 61-year historical weather data (from 1954 to 2014) published by Texas Water Development Board, the average annual lake evaporation rate is 62.60 inches and the average annual precipitation is 21.708 inches. The weather conditions combined with the pond system design will ensure adequate storage and evaporation capacity at the site.

Further analysis has been performed to demonstrate the long-term performance of the ponds under the post-development conditions. The analysis uses the 61-year historical weather data to model the pond performance with consideration of evaporation. For conservative purposes, it is assumed that the average monthly rainfall will occur within a 24-hour time period and the fact the water may be used for irrigation of the final cover vegetation is omitted. As demonstrated in Appendix III2G, all ponds will have adequate long-term storage capacity for 30 years under the post-developments conditions. For the west ponds, Pond W1 through W6, the average annual evaporation potential surpasses the annual stormwater runoff volume. For the east ponds, Ponds E1 through E4, stormwater runoff may accumulate in the ponds, however, the pond capacity still exceeds the estimated stormwater volume in the ponds after 30 years. Beyond 30 years, i.e. at the end of post-closure care period, use of the pond water may be re-evaluated in conjunction with the land use at the time.

### **3.0 CONTAMINATED SURFACE WATER OR GROUNDWATER**

30 TAC §330.305(g)

The City shall handle, store, treat, and dispose of surface or groundwater that has become contaminated by contact with the working face of the landfill or with leachate in accordance with 30 TAC §330.207, Contaminated Water Management.

#### **3.1 Contaminated Water Storage Area Design**

30 TAC §330.305(g)

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 and non-contact stormwater. Daily disposal operations will include an evaluation of the existing containment berm's capability to manage stormwater run-on and runoff.

##### **3.1.1 Run-on Control System**

30 TAC §330.305(b)

The City shall design, construct, and maintain a run-on control system capable of preventing flow onto the active portion of the landfill during the peak discharge from at least a 25-year rainfall event. The run-on berms are designed to accommodate the 25-year, 24-hour storm, the equivalent of an 8.5-inch rainfall event

To guard against soil loss, the phased development plan for landfill cell construction and solid waste placement will be followed. The figures in Part II, §3.0 Facility Layout Plan describe in detail the planned sequence of development, including sequencing of drainage and runoff controls, to ensure adequate slope stability and limited erosion and soil loss.

#### 4.4 Erosion and Sediment Control for Intermediate Cover Areas

30 TAC §330.305(e)(2)

This sub-section describes the interim controls that may be used during phased landfill development to minimize erosion of top dome surfaces and external embankment sideslopes with intermediate cover or that have reached the permitted elevations. Based on velocity and soil erosion analyses, a selection of BMPs is identified and general installation guidance is provided. Examples of standard published specifications are also provided. Standard published specifications, which will be discussed in the following sections, are provided in Appendix III2D, Example BMP Specifications. In accordance with 30 TAC §330.165(c) and TCEQ guidelines, temporary erosion and sedimentation controls will be implemented on intermediate cover areas within 180 days after placing intermediate cover, including a vegetative cover of at least 60 percent. Depending on the weather conditions and the season of the year when the intermediate cover is placed, methods of temporary control, as discussed in the following sections, will be implemented to provide for erosion protection. Pursuant to TCEQ guidelines, all calculations in support of this erosion and sedimentation control plan are based on 60 percent cover.

##### 4.4.1 Erosion and Sedimentation Control Design – Intermediate Cover Areas

Since the exact conditions of the various interim conditions are impossible to predict due to daily changes in fill patterns, a conservative approach is taken to determine the worst-case slope conditions. Therefore, the built-out condition of the final cover scenario is used as the worst-case slopes. are determined from this scenario. Even though interim conditions that are this extreme are unlikely, this is a conservative assumption so that any possible interim slope conditions or lengths are covered by this extreme case. In accordance with 30 TAC §330.305(d), the effective erosional stability of top dome surfaces and external embankment side slopes of landfill operation, closure, and post-closure care was analyzed based on the following criteria:

- The estimated peak velocity should be less than the permissible non-erodible velocities under similar conditions. The applicable non-erodible velocities are 3.75 feet per second for bare soil slopes and 5.0 feet per second for grassed (60 percent vegetation) slopes, considering the soil types, grass types, grass conditions, and slope angles at the facility (refer to Appendix III2C, Interim Erosion and Sediment Control Analysis).
- The potential soil erosion loss should not exceed the permissible soil loss for comparable soil-slope lengths and soil-cover conditions. The 2007 TCEQ guidance document has specified that the permissible soil loss is not to exceed 50 tons/acre/year and the recommended cover is 60 percent.

The top dome surface is sloped at 5 percent with a maximum length of approximately 114 feet. The external embankment sideslopes are 4H:1V slopes. Analysis indicates that the stormwater velocity on the top dome surfaces will not exceed the permissible non-erodible velocity in the worst-case conditions, and the length of the 4H:1V slope will be limited to 240 feet to satisfy the flow velocity criteria. The velocity analyses are included in Appendix III2C, Interim Erosion and Sediment Control Analysis and are summarized in Table III2-45.

**Table III2-45: Summary of Interim Slope Velocities**

Cover Slope	Slope Segment	Flow Velocity (fps)
5% slope	Segment 1 ~114 ft	0.85
4H:1V slope	Segment 1 0–240 ft	1.89

If an intermediate slope in excess of 240 feet is constructed, then a portion of the slope must be converted to final cover with permanent erosion controls, or temporary soil berms can be installed at 60-foot vertical intervals (i.e. 240 feet along the slope) along the intermediate cover slopes.

The potential soil erosion loss was calculated using the Natural Resources Conservation Service of the United States Department of Agriculture (USDA) Revised Universal Soil Loss Equation (RUSLE). A permissible soil loss of 50 tons/acre/year and a cover of 60 percent are selected as the design criteria for interim erosion and sediment controls. Results of the soil erosion analyses demonstrate that both the top surfaces and the external embankment sideslopes can achieve effective erosional stability without any stormwater diversion structures provided that the soil surfaces are stabilized with at least 60 percent ground cover. Furthermore, since the flow velocities are the governing parameter for the maximum length of the 4H:1V slopes between the soil berms, the actual amount of soil loss will be reduced. Limiting the uninterrupted length of 4H:1V slopes to a maximum of 240 feet will reduce the maximum soil loss on the intermediate slopes to approximately 18.7 tons/acre/year.

The analyses for interim erosion and sediment controls are included in Appendix III2C-1, [Interim Intermediate Cover Soil Erosion Loss and Sediment Control Analysis](#).

#### 4.4.2 Erosion and Sedimentation Control BMPs – Intermediate Cover Areas

There are numerous BMPs that can be implemented during landfill operations to meet the soil stabilization and stormwater diversion requirements. These BMPs can be used prior to establishing vegetation or in conjunction with vegetation. The selected BMPs for this site are commonly used and are discussed below. The common BMPs discussed below include a specification and/or detail for reference. The controls discussed below are available from several manufacturers. The site manager has the flexibility to purchase

Temporary downchutes will be required when soil diversion berms are installed. Based on the calculations included in Appendix III2C-2, Intermediate Cover Soil Berm Calculation the maximum allowable drainage area for the soil diversion berms yields a maximum berm length of 835 feet (corresponding to the maximum drainage area of 4.6 acres). The temporary downchute will be installed at the termination of the temporary soil diversion berm as necessary to collect runoff from the intermediate slope surface. The recommended minimum temporary downchute channels are 2-feet deep, with 2H:1V sideslopes. The downchute width will be determined based on the contributing drainage area as demonstrated in Appendix III2C-3, Intermediate Cover Downchute Channel Calculation. A geosynthetic lining material (e.g., geomembrane sheet) will be used to line the temporary downchute channels. ~~Other lining materials, such as riprap, gabion baskets, or interlocking concrete blocks, may also be used at the site manager's discretion if adequate hydraulic capacities are provided.~~ The hydraulic design of the temporary downchutes is included in Appendix III2C-3, Intermediate Cover Downchute Channel Calculation. A detail of the temporary downchute channels is shown on Figure III2-15, Erosion and Sedimentation Control Details - II. In lieu of downchute channels, corrugated plastic downchute pipes or metal pipes with equivalent flow capacity may be used. If pipes are used as downchutes, the demonstration of equivalency of downchute pipes will be maintained within the facility's site operating record, furnished upon request to the TCEQ, and made available for inspection by TCEQ personnel, as necessary.

For on-site stockpiles, the BMPs discussed previously, such as silt fence, hay bales, or rock or organic berms, may be used at the site manager's discretion to control erosion and runoff around the stockpile areas. Details of these BMPs are shown on Figures III2-14 and III2-15.

#### 4.4.3 **Placing and Removing Temporary BMPs**

The BMPs discussed in the previous sections will be placed in accordance with the specifications as included in Appendix III2D, Example BMP Specifications or in accordance with the manufacturers' guidelines for that particular material. Since these BMPs are only temporary, they will be removed at the site manager's discretion when the specific situation warrants that the control is no longer needed or if a different control is implemented. Examples of when a control will be removed or replaced are as follows:

- 60 percent cover has been established.
- The BMP has been destroyed or damaged beyond repair.
- The BMP is not functioning efficiently.
- The intermediate cover area will become part of the active disposal area again.
- The intermediate cover area will receive final cover and permanent erosion controls.
- The BMP becomes a hindrance to daily site operations.

At other times, if deemed necessary by the site manager, the control may be removed to aid in the daily ongoing waste fill and construction activities that may not specifically be itemized in the above list. The

placement and removal of temporary BMPs should not hinder the site operations, but should be considered by the site manager as an effective tool to minimize future maintenance or repairs.

BMPs will be removed or replaced as part of the site's daily operations. Removed BMPs that have been destroyed or damaged will be disposed of at the working face of the facility. The site manager will determine a location to store reusable BMPs so they are easily accessible for future construction.

## 4.5 Erosion and Sedimentation Control for Final Cover Areas

30 TAC §330.305(e)

### 4.5.1 Erosion and Sedimentation Control Design – Final Cover Areas

The final cover stormwater system design includes crownslope add-on berms along the 5 percent final cover top slopes and sideslope add-on berms spaced at 40-foot vertical intervals along the 4H:1V final cover slopes, or a maximum length of uninterrupted flow of 160 feet. The selection of stormwater management control structures will be a continual evolution of temporary and permanent control devices. The facility fill sequence plans included in Figures II-20, Operational Sequence Phases I – V will be used to properly select both temporary and permanent stormwater structural controls. The stormwater management structural controls were developed to provide low runoff velocities, to provide adequate storage and detention, and to limit sediment and soil loss impacts on stormwater discharge quality. Soil erosion loss and control was estimated using the Universal Soil Loss Equation in the USDA Handbook No. 703 – “Predicting Soil Erosion By Water: A Guide to Conservation Planning with the Revised Universal Soil Loss Equation (RUSLE),” 1997.

The design results in a maximum estimated soil loss of 2.1 tons/acre/year for the 4H:1V sideslopes of the landfill final cover. This estimate is equal to approximately 0.01 inches per year eroded from the final cover for this worst-case scenario. Soil loss calculations are presented in Appendix III2E, Final Cover Erosion Soil Loss Calculation.

### 4.5.2 Erosion and Sedimentation Control BMPs – Final Cover Areas

Permanent stormwater management controls include seeding, add-on berms, downchute channels, slope contours, perimeter berms, final cap design, detention ponds, and discharge control structures.

To stabilize the final cover soil, a 6-inch thick top soil layer that is capable of supporting native vegetation growth will be installed on the final cover surfaces. Maintenance and inspection, as addressed in §5.0 Inspection, Maintenance, and Restoration Plan of this report, will be implemented to ensure a minimum 90 percent ground cover on the final cover and to ensure that the diversion structures, including the detention ponds, function as designed.

#### 4.6 Minimizing Off-site Vehicular Tracking of Sediments

To minimize the off-site vehicular tracking of sediments onto public roadways, traffic routing and site operation practices will be developed. The following preventative measures will be utilized to control sediment tracking:

- Maintain the site entrance to minimize the accumulation of excessive mud, dirt, dust, and rocks.
- Schedule maintenance and construction of paved and temporary roads to limit disruption of traffic flow patterns or create vehicular safety problems.
- Control traffic routing during wet weather conditions to limit the impact of sediment tracking.

#### 5.0 INSPECTION, MAINTENANCE, AND RESTORATION PLAN

30 TAC §330.305(e)(1)

In addition to the design and operational considerations previously described in the §4.0 Erosion and Sedimentation Control Plan of this report, it is necessary to inspect and maintain the stormwater management system and erosion control measures to maintain the required effectiveness of the system components. The City will maintain the stormwater management system as designed and will restore and repair the drainage system in the event of washout or failure in accordance to Part IV, Site Operating Plan §4.22.6 Erosion of Cover. The inspection, maintenance, and repair guidelines as discussed in the following sections will be implemented into the employee training program as outlined in Part IV, Site Operating Plan §4.1 Personnel Training. Documentation of the inspections and repairs, as outlined below, will be denoted in the Cover Application Log and will be maintained as part of the site operating record, in accordance with the Part IV, Site Operating Plan §4.22.7 Cover Inspection Record.

#### 5.1 Stormwater Management System

The site will be monitored to ensure the integrity and adequate operation of the stormwater collection, drainage, and storage facilities. On a weekly basis, all temporary and permanent drainage facilities will be inspected. Following a significant rainfall event (greater than 0.5 inches within 24 hours), all temporary and permanent drainage facilities will be inspected within 48 hours after the rain event, as ground conditions allow. In the event of a washout or failure, the drainage system will be restored and repaired. Plans and actions will be developed to address and remediate the problem to ensure protection to ground and surface waters. Sediment and debris will be removed from channels, ponds, and from around outfall structures, as needed, to maintain the effectiveness of the stormwater management system. Minor maintenance requirements, such as removing excessive sediment and vegetation, will be undertaken as required. Upon completion of sediment removal from lined stormwater ponds, the ponds' HDPE liner will be inspected for damage and, if necessary, repaired in accordance with Part III3F, Liner Quality Control Plan.

## 5.2 Landfill Cover Materials

Landfill cover soils are inspected on a regular basis. Daily cover soils are inspected and applied in accordance with the Part IV, Site Operating Plan §4.22.1 Daily Cover. During the active life of the site, inspections of intermediate and final cover also will be performed within 48 hours after a significant rain event (greater than 0.5 inches within 24 hours) in which runoff occurs, as ground conditions allow. During the post-closure maintenance period of the site, the final cover will be inspected quarterly. The inspections will include any temporary or permanent erosion measures that are in place at the time of the inspection. Reports of these inspections will be documented in the Cover Application Log and will be maintained as part of the site operating record, in accordance with Part IV, Site Operating Plan §4.22.7 Cover Inspection Record.

Erosion gullies or washed-out areas deep enough to jeopardize the intermediate or final cover must be repaired within 5 days of detection. An eroded area is considered to be deep enough to jeopardize the intermediate or final cover if it exceeds 4 inches in depth, as measured from the vertical plane from the erosion feature and the 90-degree intersection of this plane with the horizontal slope face or surface. Damage to any temporary or permanent erosion measures noted during the inspections will be repaired or replaced within 14 days of detection. The repair schedule, as outlined for the cover or the erosion measures, may be extended due to inclement weather conditions or the severity of the condition requiring an extended repair schedule. The TCEQ's regional office in Harlingen will be notified to coordinate a revised schedule in case an extended repair schedule is required.

## 6.0 FLOODPLAIN EVALUATION

Consistent with 30 TAC §§330.61(m)(1), 330.63(c)(2), 330.307, and 330.547, an evaluation of the 100-year floodplain has been prepared and discussed in Part II §2.8, Floodplains and ~~Floodplain evaluation figures detailing facility design plan and profiles are included in~~ Part IIC, Floodplains.

### 6.1 100-year Floodplain Location

30 TAC §330.63(c)(2)(A)

As discussed in Part II §2.8.1, Location F the permit boundary for the facility extends into two small unnamed ponding areas designated Special Flood Hazard Area (SFHA) Flood Zone A as shown in Figure IIC-3, FEMA Q3 Flood Data ~~Part IIC, Floodplains~~. Note that these two SFHA areas are both localized small depressions and are not connected with any floodways. Future construction of the facility perimeter berm fill in the areas are required prior to any waste acceptance in the associated areas. As a result, the waste footprint will be outside the 100-year floodplain.

## 6.2 Data Source for Floodplain Determination

30 TAC §330.63(c)(2)(B)

~~As discussed in Part II §2.8.2, Data Source, the facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D dated June 6, 2000, which was revised by LOMR 01-06-1095P dated May 17, 2001. The SFHA changes made by subsequent Letter of Map Changes (LMOCs) have not yet been incorporated into FEMA's National Flood Insurance Program (NFIP) National Flood Hazard Layer (NFHL) digital database and does not yet contain high resolution flood hazard mapping data for Hidalgo County. The most current SFHA delineations available for the project area are FEMA Quality Level 3 (Q3) Flood Data files as verified by FEMA. The facility property is located in Hidalgo County, National Flood Insurance Program (NFIP) community number 480338. The facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D, which was most recently revised by the Letter of Map Revision Based on Fill (LOMR-F) case number 03-06-153P in 2003. The SFHA changes made by LOMR-F 03-06-153P have not yet been incorporated into a FIRM revision and FEMA's National Flood Insurance Program (NFIP) National Flood Hazard Layer (NFHL) digital database does not yet contain high resolution flood hazard mapping data for Hidalgo County. The most current SFHA delineations available are FEMA Quality Level 3 (Q3) Flood Data files. The source information section of the Q3 Flood Data metadata file lists a modification in 2005 confirming the Q3 incorporates the 2003 LOMR-F 03-06-153P map changes in the SFHA delineations. Part IIC1, FEMA CLOMR-F Request presents the current Q3 Flood Data Zone A delineations (provided by Texas Natural Resources Information System Data Support Team in January 2016) overlaying the unrevised effective FIRM panel, annotated to show where the property is located.~~

## 6.3 Flood Protection of the Facility

30 TAC §330.63(c)(2)(C)

~~As demonstrated in Part IIC2-1, FEMA CLOMR-F Request, c~~Construction of the facility ~~'s landfill~~ perimeter berm and storm water management structures—placement of fill in the SFHA Zone A areas—will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment. The facility perimeter berm encompassing the entire waste footprint will provide a minimum of three feet of freeboard above the 100-year design flood.

## 6.4 Preliminary PlanConstruction Approval

A request for Conditional Letter of Map Revision Based on the Placement of Fill (CLOMR-F) was submitted to FEMA included in Part IIC2-24, FEMA CLOMR-F Request. The submittal included a detailed discussion of proposed fill in the two SHFA Zone A areas, figures detailing facility design plan and profiles, and required documentation. FEMA responded that the proposed development does not encroach on a FEMA

designated floodway and no buildings are anticipated to be constructed on the site. ~~In addition, FEMA noted that,~~ there are no procedures under the NFIP regulations that require action by FEMA. Hidalgo County, or other agencies having jurisdiction of the site, may have requirements that apply.

The City of Edinburg has jurisdiction over the facility and adjacent properties. The Director of Public Works reviewed and approved the request for CLOMR-F and signed the Community Acknowledgement Form included in Appendix IIC2-3, Community Floodplain Management Review and Approval.

## 7.0 ALTERNATIVE SYNTHETIC GRASS FINAL COVER DRAINAGE DESIGN

The alternative synthetic grass final cover presented in Part III7, Closure Plan will consist of the following from top to bottom:

- HDPE synthetic grass
- Sand infill
- Woven geotextile filter backing
- 50-mil linear low density polyethylene (LLDPE) Super Gripnet® geomembrane with integrated drainage layer

A major consideration of the synthetic grass cover on the drainage system is that the surface runoff coefficient (CN) number is higher; a CN number of 98 for the entire final cover area was used for the analysis. Appendix III2F, Synthetic Grass Cover Drainage Calculation shows that the perimeter channels and the stormwater ponds have adequate capacity using analysis methods consistent with those discussed in Appendix III2A, Detailed Drainage Calculation.

**APPENDIX III-2A**

**DETAILED DRAINAGE CALCULATION**



## **DETAIL DRAINAGE CALCULATION**

Made By: VJE  
Checked by: MX  
Reviewed by: CGD

### **1.0 OBJECTIVE**

Develop a surface water management plan for the proposed development at the Edinburg Regional Disposal Facility (RDF) located in Hidalgo County, Texas. Compare pre- and post-development peak flows, volumes, and velocities for the 25-year, 24-hour storm event.

### **2.0 METHOD**

The proposed Edinburg Regional Disposal Facility expansion site is greater than 200 acres. Therefore, Golder utilizes the USACE HEC-HMS modeling software for the drainage analysis. Subbasins were delineated for pre- and post-development conditions using existing topography and proposed final cover topography respectively (see Figures III2A-1 and III2A-2). The pre-development conditions consist of the permitted final grades and drainage design in the currently permitted area and existing topography in the expansion area. The post-development conditions consist of the proposed final grades and drainage design.

Composite SCS curve numbers (CN) were estimated for each subbasin (USSCS, 1986). The SCS method was used to estimate a time of concentration ( $T_c$ ) for each subbasin; lag times (required for HEC-HMS input) were calculated as  $0.6 * T_c$ . Subbasin areas, curve numbers, and lag times were entered into HEC-HMS to estimate peak flows and runoff volumes.

Peak flows from the HEC-HMS hydrology model were used to design stormwater channels required for the surface water management plan (downchutes, perimeter channels, add-on berms, and perimeter drainage ditches). Channel calculations were performed using a spreadsheet that solves Manning's equation for normal depth. Culvert sizing calculations were carried out using HY8 software (FHWA, 1996).

Stage-storage relationships for all ponds were developed using site contours and spreadsheet calculations.

### 3.0 ASSUMPTIONS

- 24-hour rainfall depths (TR-55, 1986):
  - o 2-year = 4.3 in (used in time of concentration calculations)
  - o 25-year = 8.5 in
  - o 100-year = 11.0 in (used in time of concentration calculations)
- 24-hour rainfall events have an SCS Type III synthetic temporal distribution (TR-55, 1986).
- Curve numbers (consistent with previous work and local regulations/practice):
  - o Landfill final cover and other open areas, CN = 85
  - o Paved areas, CN = 98
  - o Areas where minimum infiltration are expected (ponds), CN = 98
  - o Expansion area currently grassed or used for agricultural purposes, CN = 79
- Manning's roughness coefficients:
  - o Grass-lined channels,  $n = 0.035$
  - o Riprap channels,  $n=0.040$
- Landfill downchutes are armored with flexible Geomembrane.
  - o Geomembrane lined channels,  $n = 0.012$
- Landfill downchutes are sized to convey runoff from the 25-year, 24-hour storm event and allowing 0.5 feet of freeboard.
- Add-on berms have 2H:1V and 2H:1V side slopes and form triangular channels at 2 percent longitudinal slopes on the final cover slope.
- Add-on berms are sized to convey runoff from the 25-year, 24-hour storm event and provide a minimum of 0.5 feet of freeboard.
- Perimeter channels are trapezoidal with 3H:1V side slopes and varying bottom widths and longitudinal slopes. Minimum longitudinal slope is 0.1%.
- Perimeter channels are sized to convey runoff from the 25-year, 24-hour storm event and provide a minimum of 1.0 feet of freeboard.
- Perimeter channels are armored with riprap where flow velocities exceed 5 ft/s, as applicable.

### 4.0 CALCULATIONS

Tables 1A.1, 1A.2, 1B.1, and 1B.2 contain composite curve number and time of concentration calculations for the pre- and post-development conditions. The stage-storage relationships were developed in the spreadsheets shown in Tables 2A through 2D (proposed pond E1, E2, E3, E4, W1, W2, W3, W4, W5, W6, and W7). Table 3 contains calculations for the design of downchutes, add-on berm channels, and perimeter channels. Table 4 contains calculations of the run-off velocities at the control points for pre-development and post-development conditions. Table 5 includes time of concentration and manning's flow coefficients.

Attachment A contains HEC-HMS model input and output information including basin parameters, a routing diagram, and peak flows. HY8 reports summarizing the culvert sizing calculations are included as Attachment B. See Figures III2-A-1 and III2-A-2 for subbasin delineations and channel alignments.

## 5.0 CONCLUSIONS/RESULTS

The post-development downchutes, add-on berms and perimeter channels are designed to accommodate runoff from the 25-year, 24-hour storm event with 0.5' freeboard (design shown in Table 3). Riprap sizing and gradations are found in Appendix III2-A-3.

The post-development ponds (design shown in Tables 2A through 2D) are sufficiently sized to store the runoff from the 25-year, 24-hour storm event. The maximum water surface elevations in the ponds during the 25-year, 24-hour storm event are summarized below. The water surface elevation is below the pond crest in all ponds.

POND	Runoff Volume (ac-ft)	Maximum Pond Water El. (ft-msl)	Minimum Elev.of the Pond Levee (ft-msl)
	25-year 24-hour storm	25-year 24-hour storm	
W1	31.8	85.1	91.0
W2	34.6	85.1	91.0
W3	6.9	85.1	91.0
W4	7.1	84.3	91.0
W5	7.2	84.3	91.0
W6	70.8	84.3	91.0
W7	7.9	78.5	91.0
E1	80.2	77.4	94.0
E2	86.1	77.4	94.0
E3	11.5	77.4	94.0
E4	8.7	77.4	94.0

The culvert design for the post-development condition is summarized in the table below:

Culvert ID	25-year, 24-hour Design Storm	
	Flow Rate (cfs)	Culvert Design (number of barrels)
C1	209.0	3 - 6' x 3' conc. box
C2	238.8	6 - 4' x 2' conc. box
C3	555.5	6 - 6' x 3' conc. box

Note: See Figure III2-A-2 for locations of the proposed culvert. Alternative designs may be utilized if they provide adequate flow capacity.

The flow rates and volumes at the control points for both the pre-development and post-development conditions are summarized below.

Run-off Control Point	Flow Rates Pre-Development 25-year, 24-hour (cfs)	Flow Rates Post-Development 25-year, 24-hour (cfs)	Volumes Pre-Development 25-year, 24-hour (cfs)	Volumes Post-Development 25-year, 24-hour (cfs)
CP1	47.5	0	9.8	0
CP2	548.8	0	115.2	164.9 (west ponds)
CP3	32.5	0	4.1	0
CP4	21.0	0	2.9	0
CP5	226.4	0	29.8	0
CP6	250.6	0	42.1	0.0
CP7	51.1	19.5	9.8	3.9
CP8	55.6	0	9.6	187.7 (east ponds)
CP9	19.6	0	4.1	0
CP10	117.6	0	19.9	0
CP11	324.0	0	41.0	0
CP12	89.3	0	10.2	0
CP13	117.9	0	17.4	0

## 6.0 REFERENCE

1. Texas State Department of Highways and Public Transportation. December 1985. *Bridge Division Hydraulic Manual*, 3rd Edition.
2. TR-55. June 1986. *Urban Hydrology for Small Watersheds*. Washington D.C.: Department of Agriculture for Natural Resources Conservation Service, Conservation Engineering Division.
3. U.S. Federal Highway Administration (FHWA). 1996. *HY8 - Culverts Version 7.3 FHWA Culvert Analysis*. Washington, D.C.: FHA Office of Technology Applications [software package].
4. U. S. Soil Conservation Service (USSCS). 1986. *Urban hydrology for small watersheds, 2nd edition*. (USSCS Technical Release Number 55). Washington D.C.: United States Department of Agriculture.
5. US Army Corps of Engineers. 2003. *HEC-HMS Hydrologic Modeling System* [computer software] May 2003 Version 4.0.
6. US Army Corps of Engineers *EM 1110-2-1601 Hydraulic Design of Flood Control Channels*. July 1991.

**APPENDIX III-2A**

**TABLES**

**TABLE 2D: POND E1, E2, E3, & E4 STAGE-STORAGE VOLUME (25-YEAR STORM)**

In order to calculate the total storage of the hydrologic reservoir routing, it is necessary to construct a storage-indication curve. Construct an Elevation-Storage (E-S) curve using the working design drawing and the following formula:

$$S = \Delta h \frac{A_1 + A_2 + (A_1 A_2)^{0.5}}{3}$$

where:

- S = pond volume (ft<sup>3</sup>)
- Δh = height of volume element (ft)
- A<sub>1</sub> = surface area of bottom of volume element (ft<sup>2</sup>)
- A<sub>2</sub> = surface area of top of volume element (ft<sup>2</sup>)

Pond E1						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
67.5	0	0.00	0	0	0	0
68.0	8,659	0.20	1,443	0.03	1,443	0.03
70.0	78,903	1.81	75,801	1.74	77,244	1.77
72.0	98,120	2.25	176,675	4.06	253,918	5.83
74.0	156,310	3.59	252,182	5.79	506,101	11.62
76.0	223,473	5.13	377,788	8.67	883,889	20.29
78.0	299,609	6.88	521,225	11.97	1,405,114	32.26
80.0	314,258	7.21	613,809	14.09	2,018,923	46.35
82.0	329,183	7.56	643,383	14.77	2,662,306	61.12
84.0	344,382	7.91	673,507	15.46	3,335,813	76.58
86.0	359,856	8.26	704,181	16.17	4,039,994	92.75
88.0	375,574	8.62	735,374	16.88	4,775,368	109.63
90.0	391,576	8.99	767,095	17.61	5,542,463	127.24
92.0	407,871	9.36	799,392	18.35	6,341,856	145.59
94.0	424,438	9.74	832,254	19.11	7,174,110	164.69

Pond E2						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
75.8	0	0.00	0	0	0	0
76.0	17,140	0.39	1,074	0.02	1,074	0.02
78.0	314,858	7.23	270,306	6.21	271,381	6.23
80.0	329,877	7.57	644,678	14.80	916,058	21.03
82.0	345,155	7.92	674,975	15.50	1,591,033	36.52
84.0	360,391	8.27	705,491	16.20	2,296,525	52.72
86.0	376,486	8.64	736,818	16.91	3,033,343	69.64
88.0	392,591	9.01	769,021	17.65	3,802,364	87.29
90.0	408,909	9.39	801,445	18.40	4,603,809	105.69
92.0	425,505	9.77	834,359	19.15	5,438,167	124.84
94.0	442,359	10.16	867,809	19.92	6,305,976	144.76

Pond E3						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
62.8	0	0.00	0	0	0	0
64.0	36,899	0.85	14,760	0.34	14,760	0.34
66.0	263,730	6.05	266,184	6.11	280,944	6.45
68.0	462,503	10.62	716,990	16.46	997,934	22.91
70.0	478,420	10.98	940,878	21.60	1,938,812	44.51
72.0	494,599	11.35	972,974	22.34	2,911,786	66.85
74.0	511,041	11.73	1,005,595	23.09	3,917,381	89.93
76.0	527,745	12.12	1,038,741	23.85	4,956,122	113.78
78.0	544,712	12.50	1,072,413	24.62	6,028,535	138.40
80.0	561,942	12.90	1,106,610	25.40	7,135,145	163.80
82.0	579,435	13.30	1,141,332	26.20	8,276,477	190.00
84.0	597,190	13.71	1,176,580	27.01	9,453,057	217.01
86.0	615,208	14.12	1,212,353	27.83	10,665,410	244.84
88.0	633,488	14.54	1,248,651	28.66	11,914,061	273.51
90.0	652,031	14.97	1,285,475	29.51	13,199,535	303.02
92.0	670,837	15.40	1,322,823	30.37	14,522,359	333.39
94.0	689,909	15.84	1,360,702	31.24	14,560,237	334.26

Pond E4						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
69.3	0	0.00	0	0	0	0
70.0	6,724	0.15	1,461	0.03	1,461	0.03
72.0	84,064	1.93	76,374	1.75	77,836	1.79
74.0	247,310	5.68	317,040	7.28	394,876	9.07
76.0	368,657	8.46	611,943	14.05	1,006,819	23.11
78.0	383,892	8.81	752,498	17.27	1,759,318	40.39
80.0	399,413	9.17	783,254	17.98	2,542,572	58.37
82.0	415,220	9.53	814,582	18.70	3,357,154	77.07
84.0	431,313	9.90	846,482	19.43	4,203,636	96.50
86.0	447,691	10.28	878,953	20.18	5,082,589	116.68
88.0	464,356	10.66	911,996	20.94	5,994,585	137.62
90.0	481,306	11.05	945,611	21.71	6,940,196	159.32
92.0	498,542	11.44	979,798	22.49	7,919,994	181.82
94.0	516,080	11.85	1,014,572	23.29	8,934,567	205.11

Combined Stage Storage Volumes for Ponds E1, E2, & E4 (Interconnected by Equalizing Pipes)

Elevation (ft MSL)	Σ Volume (acre-ft)
62.8	0
68.0	22.94
70.0	46.32
72.0	74.46
74.0	110.61
76.0	157.21
78.0	217.27
80.0	289.55
82.0	364.71
84.0	442.81
86.0	523.90
88.0	608.04
90.0	695.27
92.0	785.63
94.0	848.82

Volume required per HEC-HMS model:

Pond Name	Volume (acre-ft)
E1	80.2
E2	86.1
E4	8.7
E3	11.5
Σ Volume	186.5

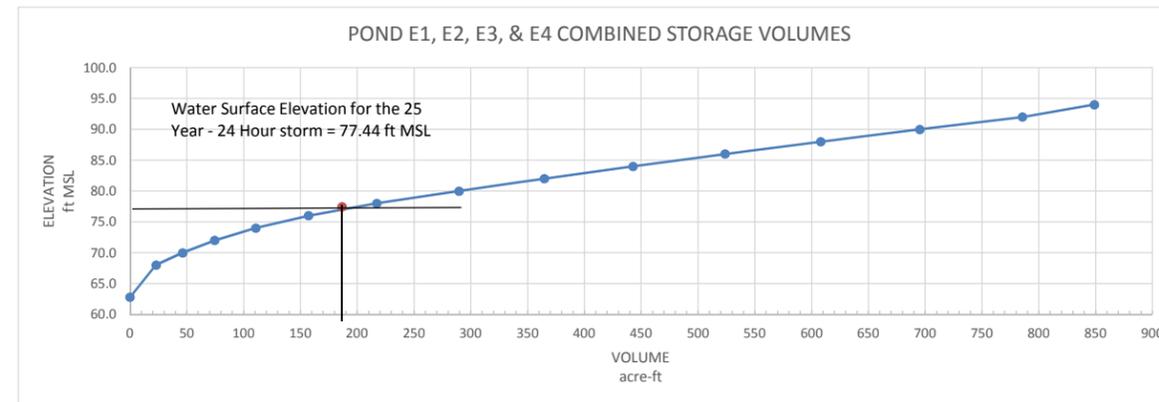
Next, the water surface elevation of the peak volume for the 25 year - 24 hour storm event. The peak volume is calculated using the HEC-HMS program. The water surface elevation is calculated by interpolation based on the stage storage table.

$$y_2 = \frac{(x_2 - x_1)(y_3 - y_1)}{(x_3 - x_1)} + y_1$$

y = elevations (ft MSL)  
x = volume (ac-ft)

25 year - 24 hour storm event  
Peak Volume = 186.50 ac-ft  
Water Surface Elevation = 77.44 ft MSL

- References:
- US Army Corps of Engineers. 2003. *HEC-HMS Hydrologic Modeling System* [computer software] May 2003 Version 4.0.



**APPENDIX III-2A**

**FIGURES**

**APPENDIX III-2B**

**ACTIVE FACE BERM SIZING**

## ACTIVE FACE BERM SIZING

Made By: VJE  
Checked by: MX  
Reviewed by: CGD

### 1.0 OBJECTIVE

Calculate the required size of the stormwater containment berm at the landfill active face as a function of plane area of the active area.

### 2.0 GIVEN

- Waste slope of 4H:1V
- 25 years, 24 hour storm event of 8.5 inches;
- Berm slope of 2H:1V;
- 1.0 ft. freeboard on berm

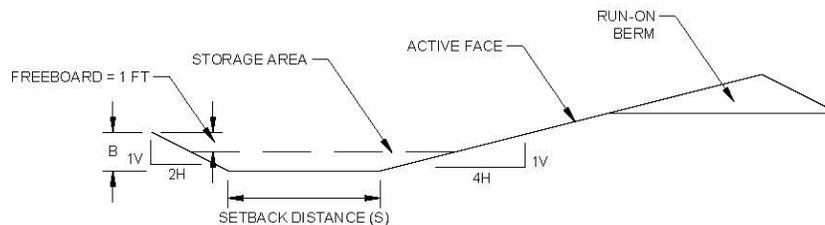
### 3.0 ASSUMPTIONS

- Stormwater run-on to the active face will not be allowed
- 50 percent run-off from the active face, i.e., 50% infiltration

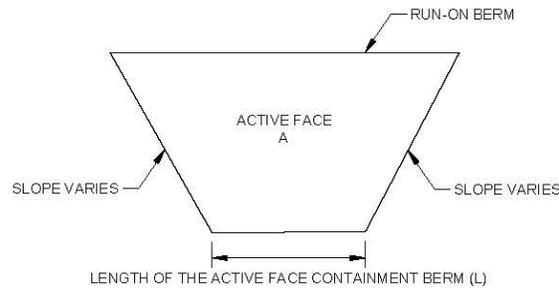
### 4.0 CALCULATION

Derive relationships for the amount of runoff from the 8.5 inch design storm and the available storage volume as a function of the active face area.

#### Cross-section of the Active Face and Containment Berm



## Elevation View of the Active Face and Containment Berm



### 4.1 Runoff, R

$$R = .5 \left( 8.5 \div 12 \text{ in/ft} \right) \times A = \frac{.71}{2} \times A = .35 \times A$$

Where:

R = total runoff into the active area containment berm (cf)

A = total area of the active face (sf)

### 4.2 Storage, V

$$V = L \times \left( \frac{S + (S + (B - 1) \times 2 \times (B - 1) \times 4)}{2} \right) \times (B - 1)$$

$$V = (3B^2 + (S - 6) \times B - S + 3) \times L$$

Where:

V = storage capacity an active face containment berm (cf)

L = length of the active face containment berm (ft)

### 4.3 Height of Berm, B

Now set runoff, R, equal to storage, V, and solve for the height of berm, B.

$$B = \frac{6 - S + \sqrt{S^2 + 4.2 \frac{A}{L}}}{6}$$

For typical site operations, the maximum berm height will be 6 ft. The operator can vary the berm length and setback distance to limit the berm height to 6 ft.

Now plot B versus L for various values of S and A. Figures 1 through 8 present the plots for active working areas of 10,000, 20,000, 30,000, 40,000, 50,000, 60,000, 70,000, and 80,000 sf, respectively.

#### 4.4 Procedure To Select Berm Size

Procedure to select berm size using Figures 1 through 8:

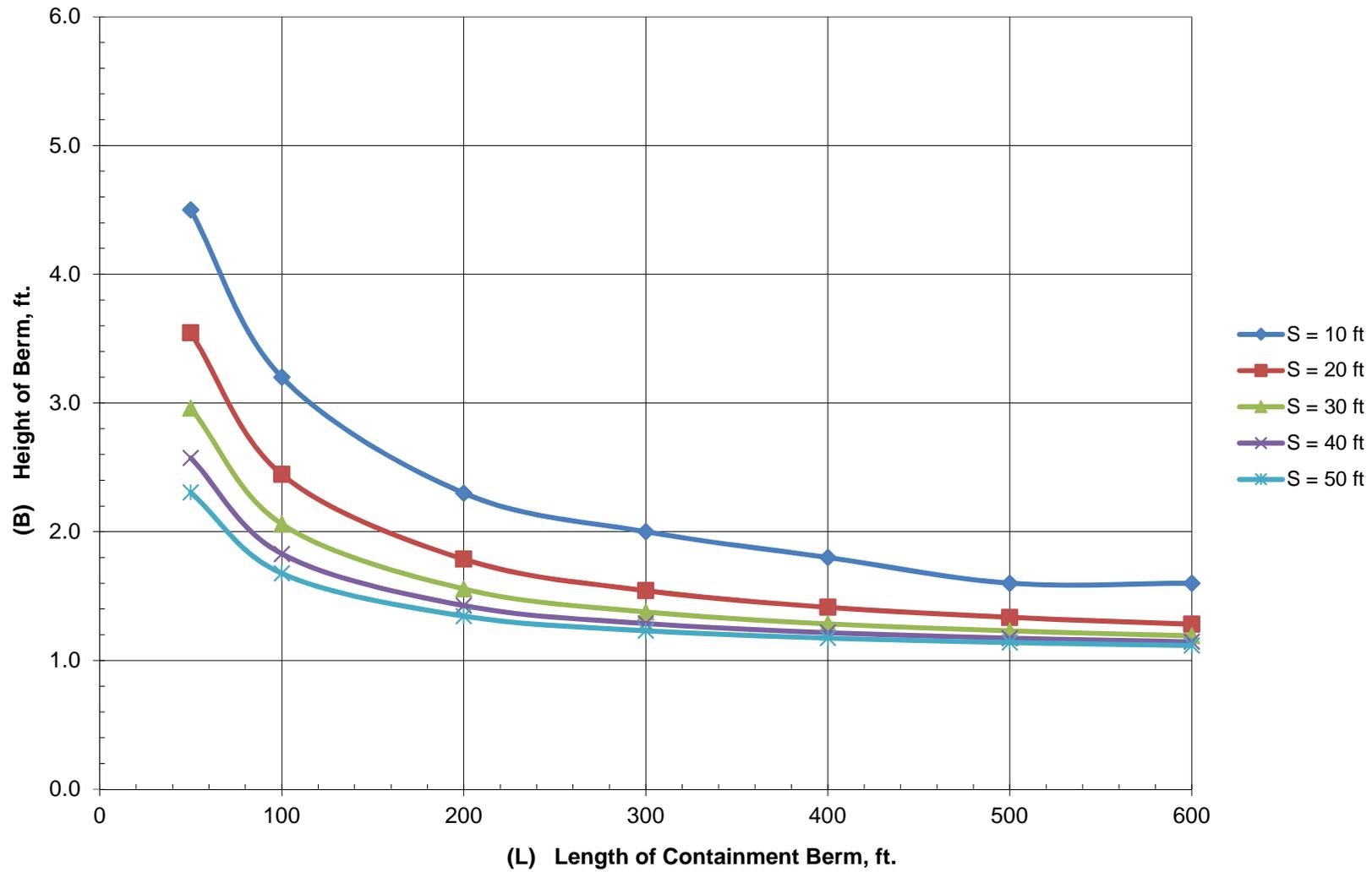
- 1) Determine the active face area (A);
- 2) Select a figure from Figures 1-8 that has an active area closest to, but no less than the actual A. For example, if A=25,000, choose Figure 3 (A=30,000);
- 3) Determine the minimum setback distance (S) for the daily operation, and select the corresponding curve. If the setback distance falls between the numbers shown on the figure, the closest but smaller value of S will be used. For example, if S=25 ft, choose the curve representing 20 ft; and
- 4) Measure the length of the active face containment berm, and determine the required berm height from the selected curve. Figures 1 through 8 cover a wide range of berm length (i.e. toe width of the active face) for normal waste fill operations. If the actual berm length is longer than the maximum value on the curve, the maximum berm length can be used to determine a conservative berm height. If the actual berm length is shorter than the minimum value on the curve, the operator can use equation (1) above to determine berm height.

Example using attached figures: A = 10,000 sf, s = 20 ft, L = 200 ft => B = 1.8 ft (from Figure 1, curve S = 20 ft).

#### 5.0 CONCLUSION

Figures 1 through 8 and the procedure discussed above provide guidance for determining the size of the stormwater containment berm based on the height of the active face (runoff area), the length of the containment berm, and the setback distance from the active face. The equations presented in this calculation may be used to determine the required berm height for various active face areas, berm lengths, and setback distances.

**Figure 1. Berm Height vs. Berm Length for Various Setbacks**  
**A = 10,000 sf**



**Figure 2. Berm Height vs. Berm Length for Various Setbacks**  
**A = 20,000 sf**

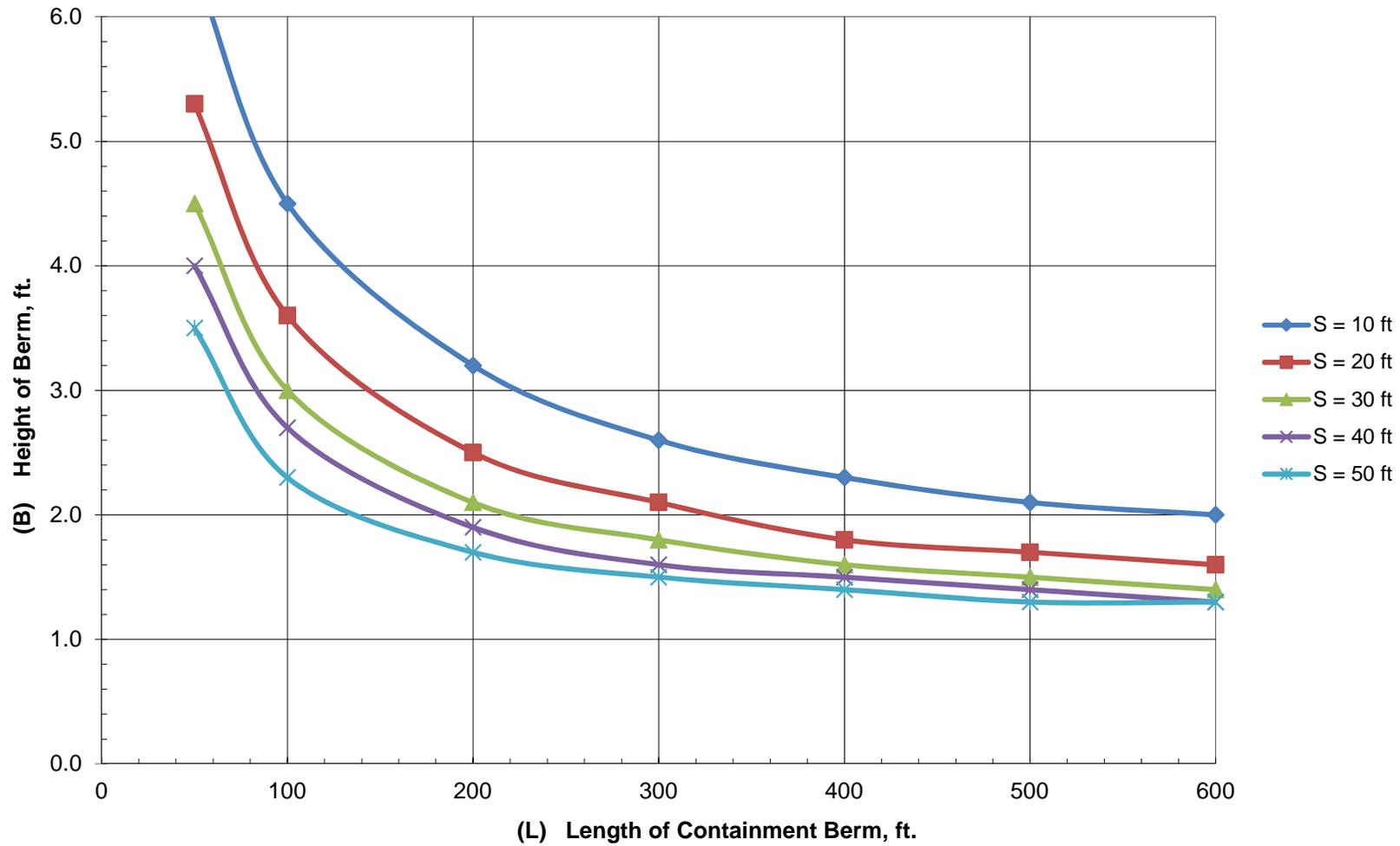


Figure 3. Berm Height vs. Berm Length for Various Setbacks

A = 30,000 sf

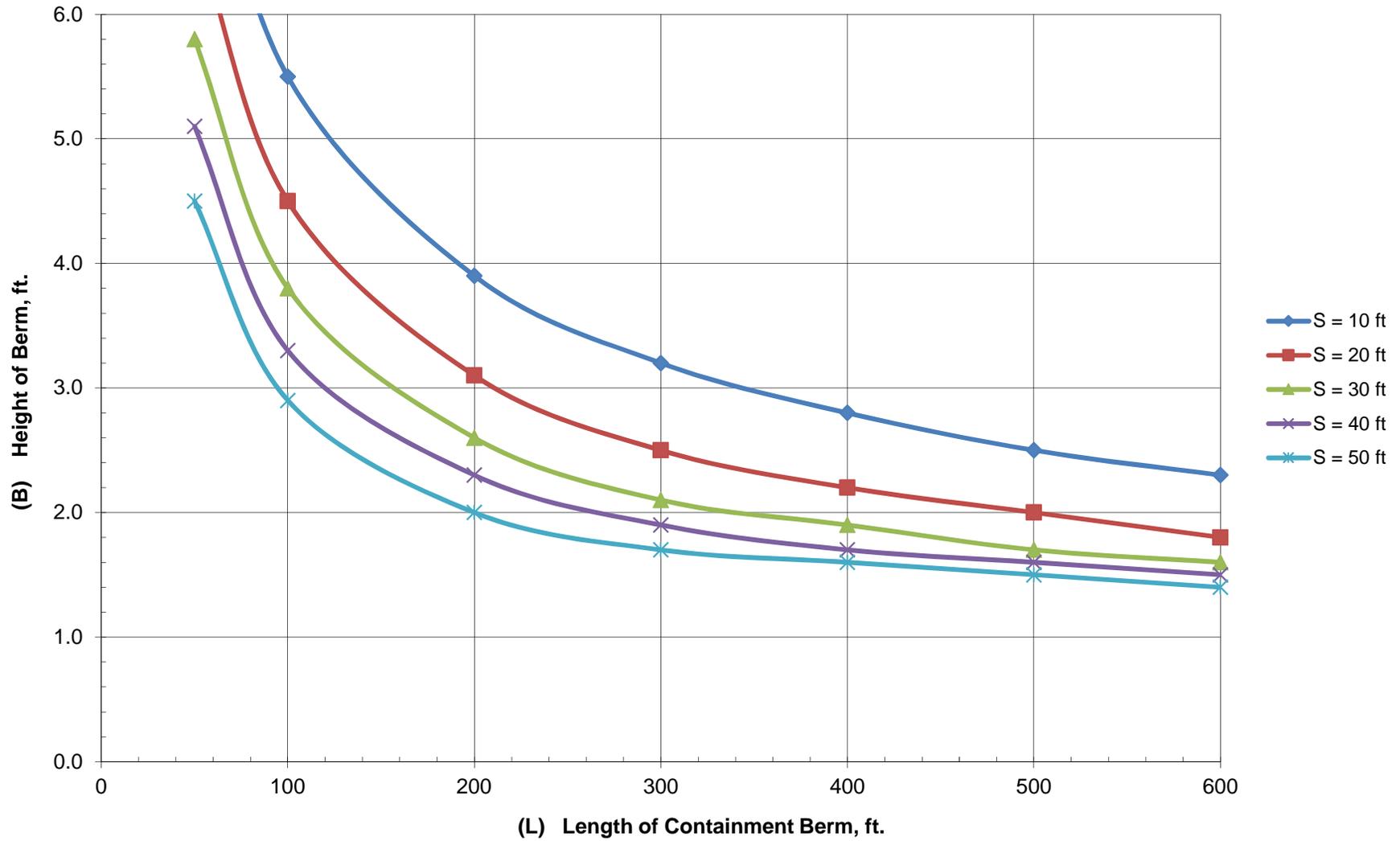
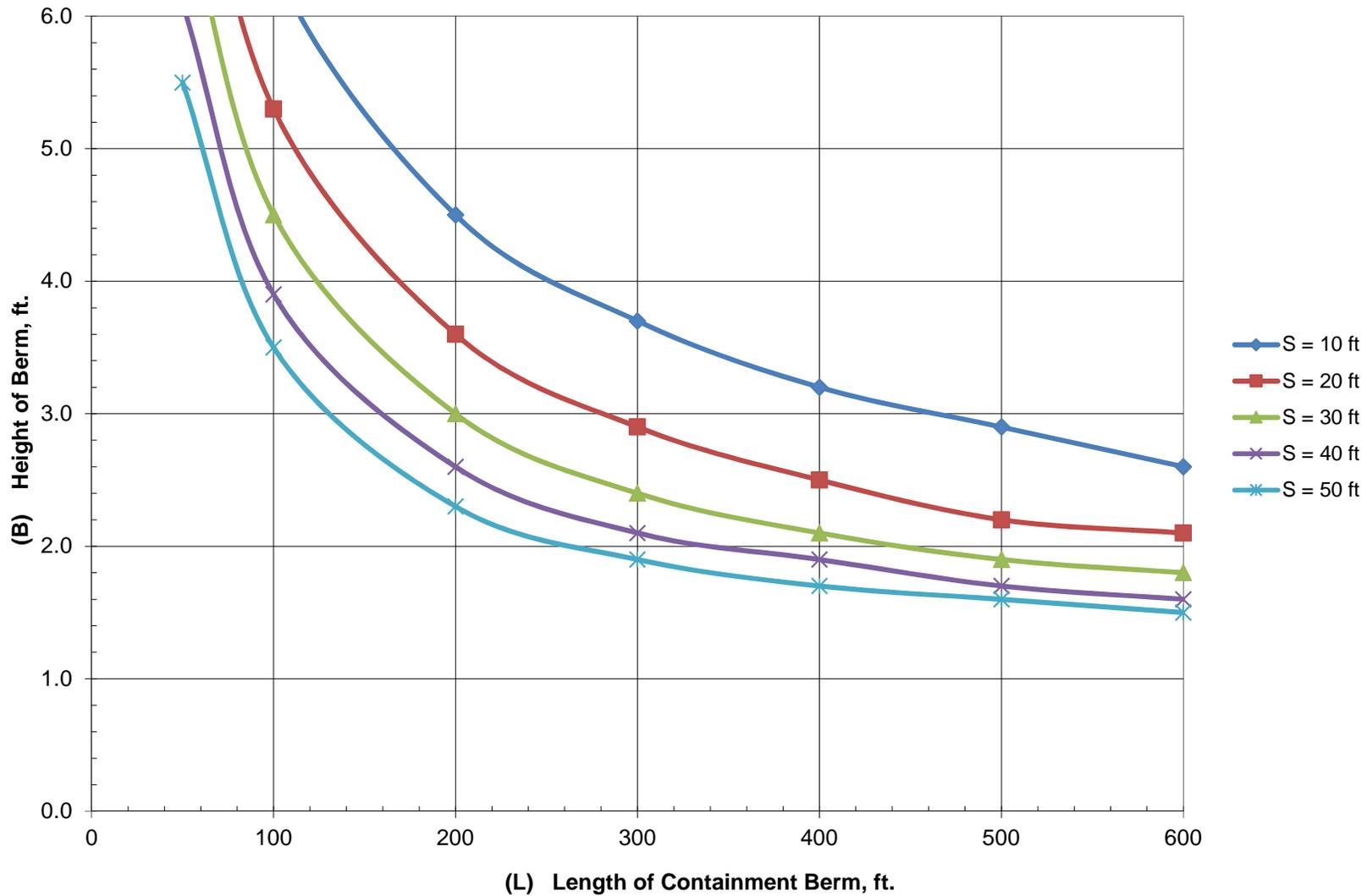


Figure 4. Berm Height vs. Berm Length for Various Setbacks

A = 40,000 sf



**Figure 5. Berm Height vs. Berm Length for Various Setbacks**  
**A = 50,000 sf**

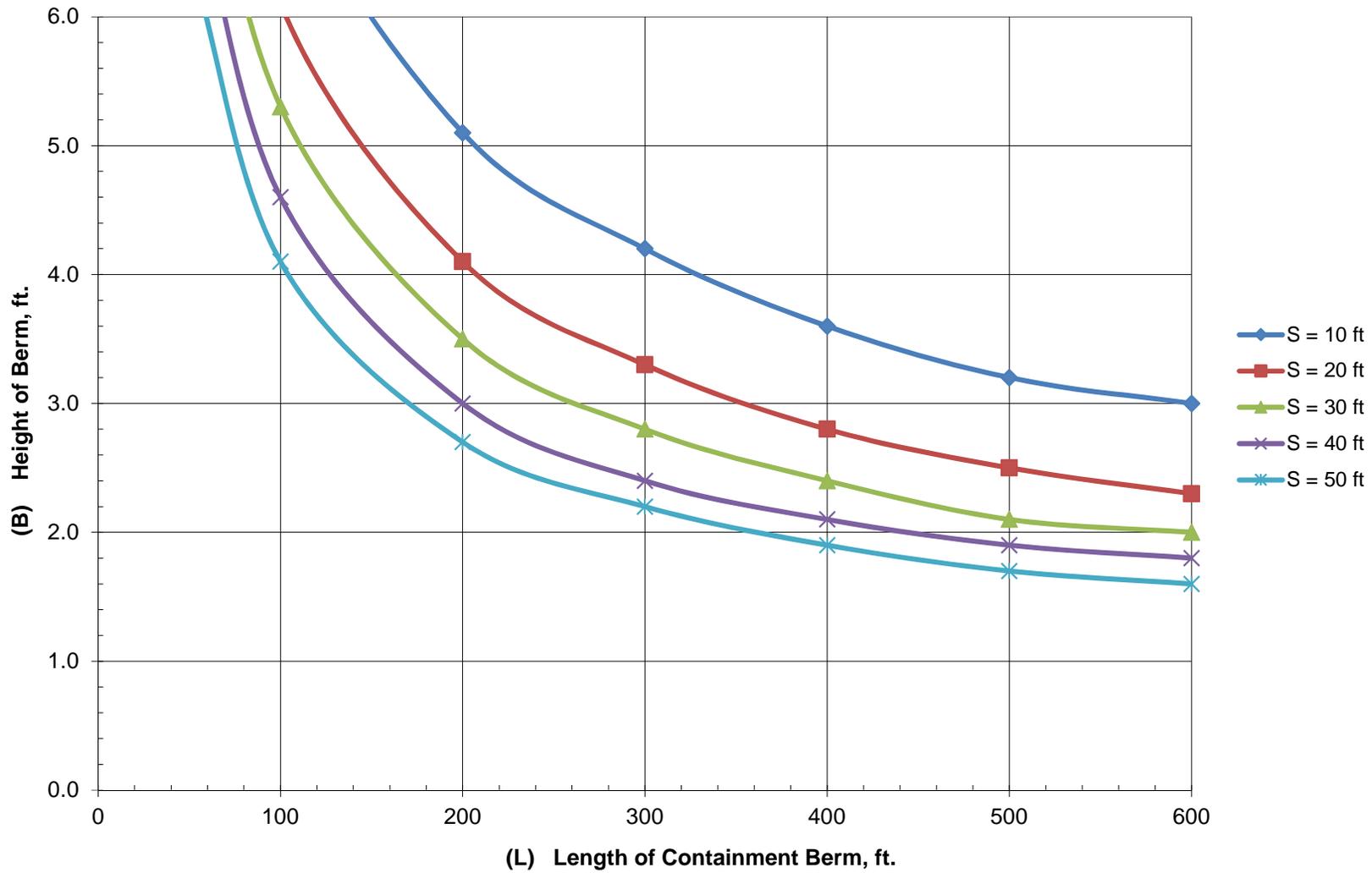


Figure 6. Berm Height vs. Berm Length for Various Setbacks

A = 60,000 sf

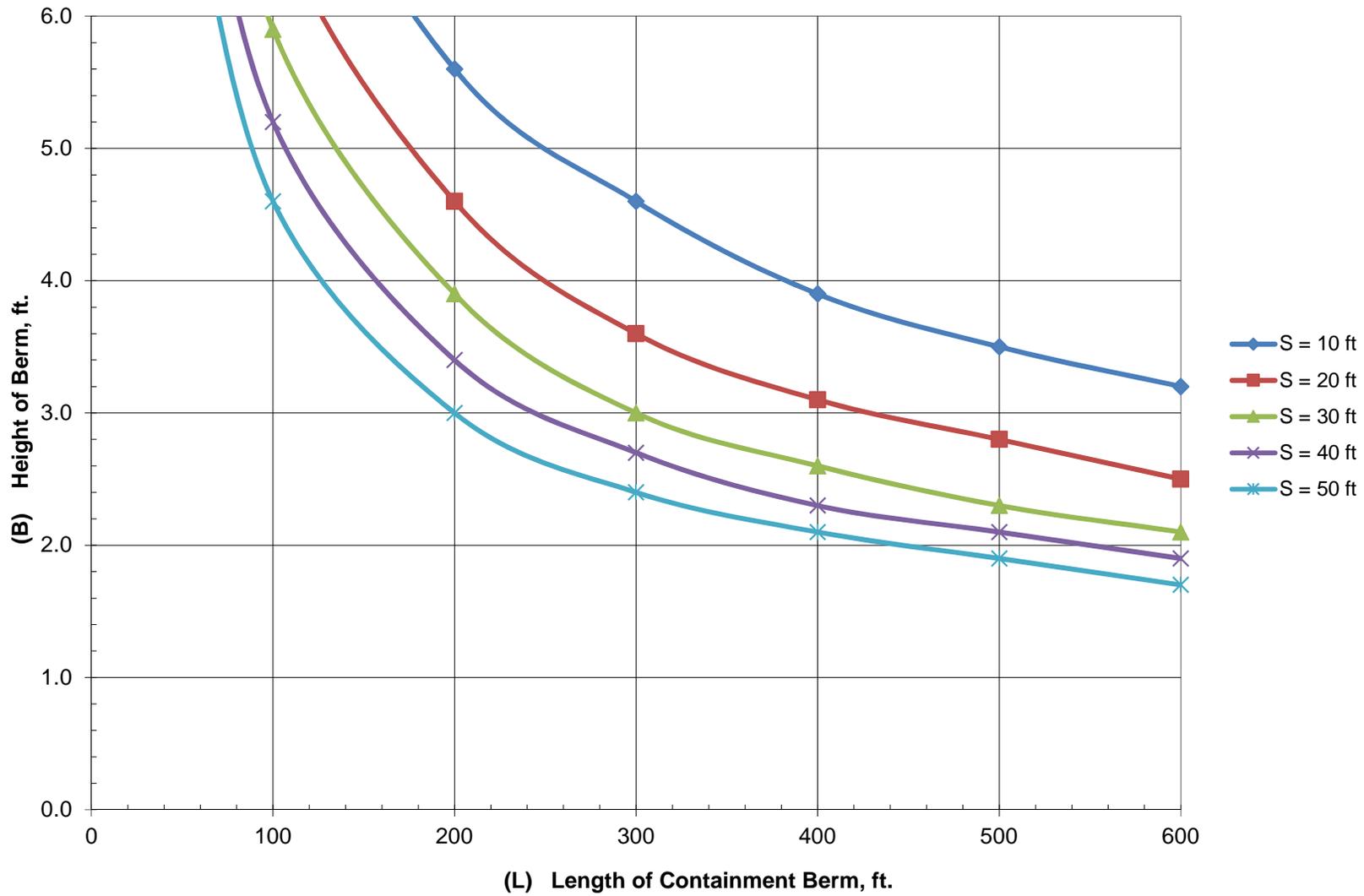
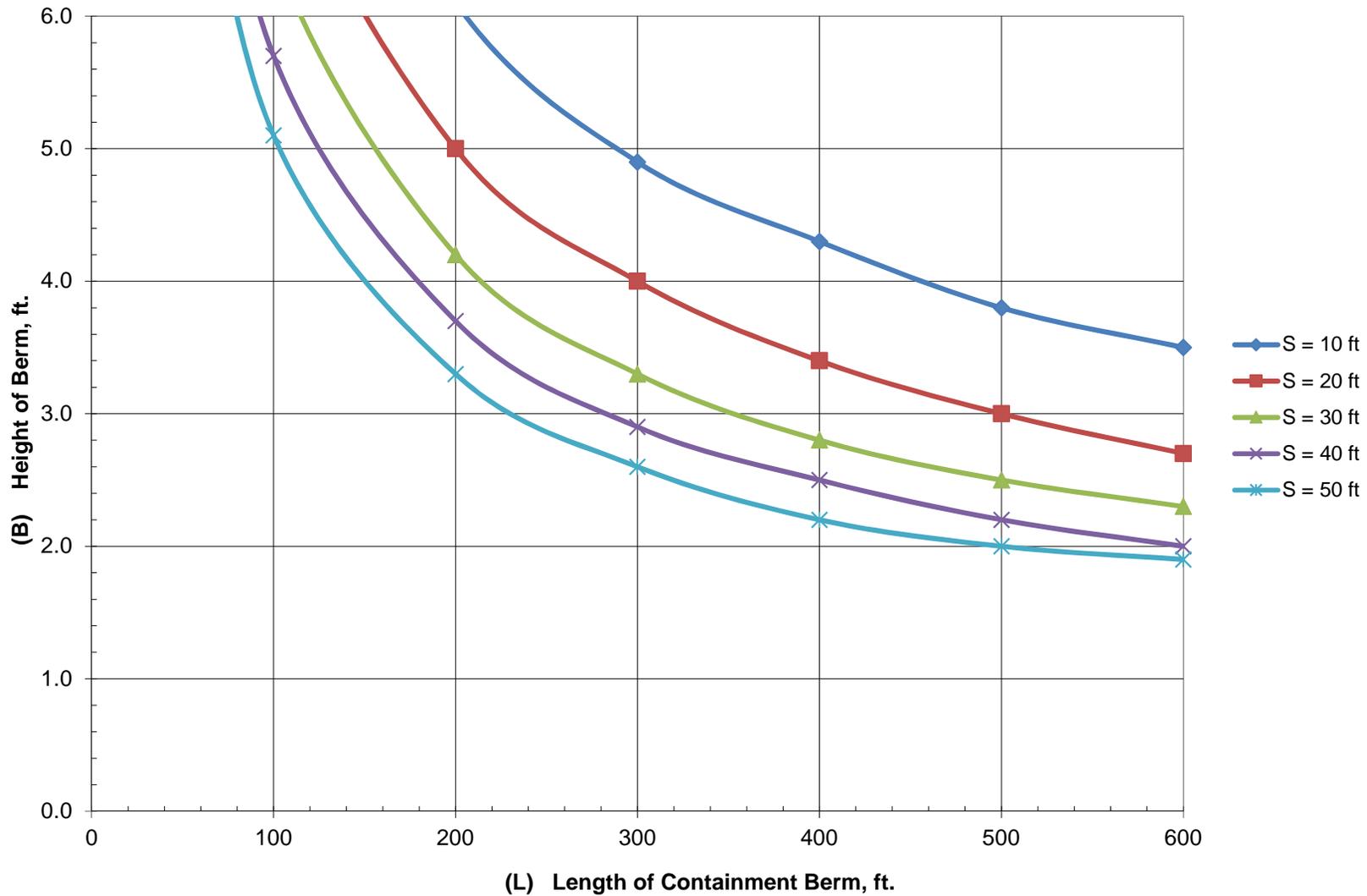
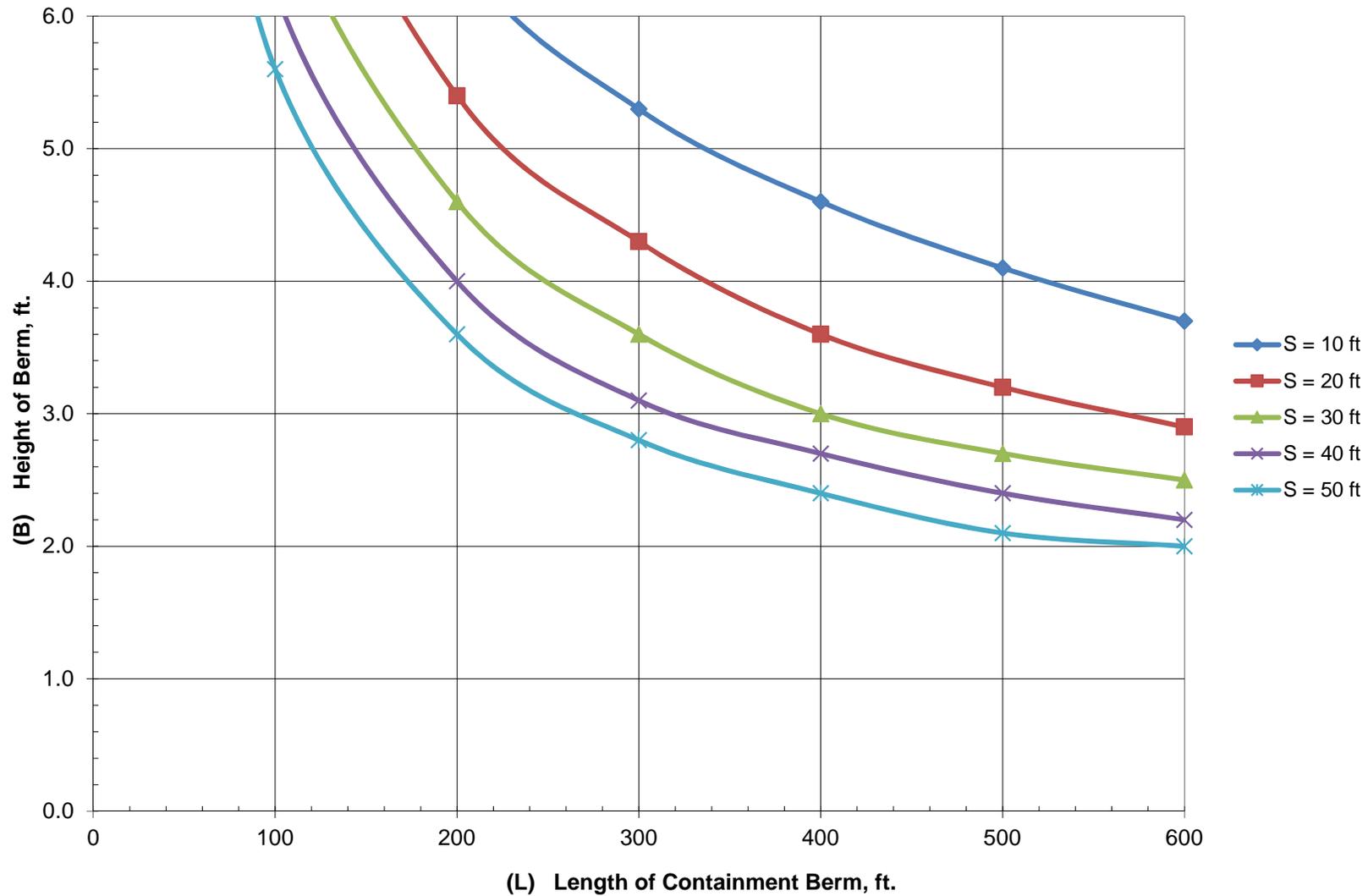


Figure 7. Berm Height vs. Berm Length for Various Setbacks

A = 70,000 sf



**Figure 8. Berm Height vs. Berm Length for Various Setbacks**  
**A = 80,000 sf**



**APPENDIX III-2F**

**FIGURES**

**APPENDIX III2G**

**LONG-TERM POND STORAGE CAPACITY ANALYSIS**

## LONG-TERM POND STORAGE CAPACITY ANALYSIS

Made By: MX  
 Checked by: CEI  
 Reviewed by: CGD

### 1.0 OBJECTIVE

Evaluate the long-term storage capacity, considering both the rainfall runoff and evaporation, of the stormwater storage and evaporation Ponds W1-W3, Ponds W4-W6, and Ponds E1-E4.

### 2.0 GIVEN

The proposed post-development ponds at the facility are retention ponds, designed to store the stormwater runoff. Additionally, the semi-arid weather at the site allows for the evaporation pond design.

The proposed ponds have been demonstrated to have adequate storage capacity to contain the runoff from the 25-year 24-hour design storm with adequate freeboard. Discussion is included in Part III2 § 2.3.5, Stormwater Ponds and calculations are provided in Part III2A, Detailed Drainage Calculations.

Precipitation and gross lake evaporation data published by Texas Water Development Board are used for the evaluation. Based on 61-year the historical weather data (from years 1954 to 2014) (Reference 1), the average annual lake evaporation is 62.6 inches and the average annual precipitation is 21.7 inches. Both the average monthly precipitation and total average annual precipitation are provided in the table below.

Precipitation (inches)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
	1.10	1.20	0.75	1.28	2.36	2.31	1.69	1.90	4.20	2.51	1.22	1.18	<b>21.70</b>

To estimate the runoff volume to the ponds, we conservatively assumed that the average rainfall for each month occurs within 24 hours.

### 3.0 CALCULATIONS

The runoff volume was calculated using the NRCS Curve Number Method (Reference 2).

Composite SCS Curve Number	S = (1000/CN)-10
88	1.36

Runoff Volume (ac-ft)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
Ponds W1-W3	3.20	3.85	1.27	4.39	12.94	12.51	7.40	9.07	29.88	14.25	3.98	3.72	<b>106</b>
Ponds W4-W6	3.70	4.44	1.46	5.06	14.94	14.44	8.55	10.48	34.50	16.45	4.59	4.29	<b>123</b>
Ponds E1-E4	8.30	9.98	3.29	11.38	33.56	32.44	19.20	23.54	77.49	36.95	10.32	9.64	<b>276</b>

Pond	Runoff Watershed Area (ac)	Annual Evaporation Volume from the Ponds (ac-ft)	Pond Storage Capacity (ac-ft)	25-Year 24-Hr Storm Runoff Volume (ac-ft)	Does Pond have Adequate Capacity to Contain the 25-Yr 24-Hr Storm Runoff?	Average Annual Runoff Volume (ac-ft)	Cumulative Stormwater Remain in Pond After 30 Years	Does Pond Have Adequate Capacity to Store the 30-Yr Cumulative Stormwater Volume?
	(a)	(b)	(c)	(d)	(c) > (d)?	(e)	(f)= ((e)-(b))*30	(c) > (f)?
Ponds W1-W3	123	127	220	73	YES	106	0	YES
Ponds W4-W6	142	150	283	85	YES	123	0	YES
Ponds E1-E4	319	249	882	187	YES	274	764	YES

**4.0 CONCLUSION/RESULTS**

The above calculations demonstrate that all the ponds will have adequate long-term storage capacity for a minimum of 30 years under the post-development conditions. As discussed earlier, this analysis is based on conservative assumptions (assuming the monthly rainfall occur within 24 hours). Furthermore, the pond water may be used for site use to irrigate the final cover surfaces. After a 30-year period, water use in the ponds may be re-evaluated in conjunction with the land use at the time.

**5.0 REFERENCES**

- 1) Texas Water Development Board Weather Data.
- 2) U.S. Soil Conservation Service (TR-55). 1986. Urban Hydrology for Small Watersheds, 2nd Edition. (USSCS Technical Release Number 55). Washington D.C.: United States Department of Agriculture.



PERMIT AMENDMENT APPLICATION

Part III, Attachment 3

# WASTE MANAGEMENT UNIT DESIGN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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design top of waste grades. New landfill cells will be developed adjacent to existing filled areas and waste placement operations will continue below grade.

### 1.3 Landfill Unit Elevations

30 TAC §330.63(d)(4)(C)

Figure III3-1, Facility Layout Plan illustrates an outline of the solid waste management units. Waste within Pre-Subtitle D Units 1-4 will either be relocated for development of Unit 8 or an Overliner- will be constructed for vertical expansion. Figure III3-2A, Subgrade Layout Plan – Overliner Option depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Overliner. Likewise Figure III3-2B, Subgrade Layout Plan –Unit 8 Option, depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Unit 8. The elevation of deepest excavation (EDE) for the facility is 70 ft-msl located at the bottom of leachate collection sumps for each cell within Units 6, 7, and 8 as depicted on Figures III3-2A and III3-2B.

Figure III3-3, Final Contour Map depicts the maximum final cover elevation of approximately 398 ft-msl. The maximum waste elevation is the final cover elevation minus the thickness of final cover and is dependent on thickness of the final cover lining option used. Part III7, Closure Plan details final cover lining options.

### 1.4 Estimated Rate of Solid Waste Deposition and Operating Life

30 TAC §330.63(d)(4)(D)

Disposal capacity as referenced in 30 TAC §330 Subchapter P is amount of waste that a facility can dispose. Similarly, the EPA defines landfill capacity as the amount of airspace volume. The maximum total disposal capacity of the facility is 87,301,156 cubic yards, and the maximum remaining disposal capacity will be 76,304,934 cubic yards of waste and daily cover, based on the FY 2016 MSW Annual Report. It is anticipated that the rate of waste disposal will reach approximately 1,500,000 tons per year and that the facility will have a site life of approximately 63.5 years. The total disposal capacity and operational life calculations are provided in Appendix III3A, Volume and Site Life Calculations.

As population, economic conditions, and available landfill disposal capacity change within the region, the volume of incoming waste could vary considerably. The facility will maintain quarterly records to document waste acceptance rates. If the rate exceeds the estimated rate and is not due to a temporary occurrence, the City will file a permit modification application consistent with 30 TAC §330.125(h). As provided by rule, the estimated waste acceptance rate is not a limiting parameter of the permit.

## 1.5 Landfill Unit Cross-Sections

30 TAC §330.63(d)(4)(E) & (F)

Figure III3-4A, Fill Cross-Sections Location Map is a map showing a sufficient number of cross-sections across the facility, both latitudinally and longitudinally, so as to accurately depict the existing and proposed depths of all fill areas within the site. These fill cross-sections go through or very near soil borings where boring logs obtained from Part III4B, Soil Boring Logs are shown on the plan profiles, Figures III3-4B – III3-4E, Fill Cross-Sections. These plan profile figures provide an inset key map of the fill cross-section plan and clearly show the following content provided in Table III3-1, Fill Cross-Section Figures III3-4B – III3-4E.

**Table III3-1: Fill Cross-Section Figures III3-4B – III3-4E**

Plan Profile Content	A – A'	B – B'	C – C'	D – D'
Plan Inset Key Map	✓	✓	✓	✓
Boring Logs	✓	✓	✓	✓
Top of Levee	✓	✓	✓	✓
Top of Proposed Fill (Top of Final Cover)	✓	✓	✓	✓
Maximum Elevation of Proposed Fill	✓	✓	✓	✓
Top of the Wastes	✓	✓	✓	✓
Existing Ground	✓	✓	✓	✓
Bottom of the Excavations (Subgrade)	✓	✓	✓	✓
Side Slopes of Trenches and Fill Areas	✓	✓	✓	✓
Gas Vents or Wells	✓		✓	
Groundwater Monitoring Wells	✓	✓	✓	✓
Initial and Static Levels of Any Water Encountered	✓	✓	✓	✓
Compacted Perimeter Berms	✓	✓	✓	✓

Notes: 1. Items not checked are not applicable.  
 2. Perimeter berm design dimensions shown on figures.

## 2.0 WASTE MANAGEMENT UNIT ENGINEERING ANALYSES

Analyses were performed to assess the performance of the landfill with respect to settlement and slope stability. Each of these analyses is described in detail in the following sections.

### 2.1 Settlement Analysis

Facility floor settlement will occur in Strata I through III. Review of the excavation plan indicates that much of Stratum I will be removed prior to construction of the liner system and that much of the Edinburg Regional Disposal Facility floor will be founded on a thin layer of remaining Stratum I. For this analysis, settlement critical cross-sections are cut through a section of the Edinburg Regional Disposal Facility with the thickest waste above and the most critical subsurface conditions. Intermittent points along the critical cross-section are analyzed for settlement and post-settlement to define slopes. The cross-section location is referred to

as Line A, located in Unit 7, Cell 2A and 2B on a north-south direction. The cross-section begins at the facility perimeter and progress toward the facility center where the proposed final elevation is highest.

The settlement analyses indicate that the minimum total settlement will be approximately 4 feet and the minimum post-settlement grade on the floor will be 0.6%. The post-settlement grade was used in the leachate header pipe sizing calculations (Appendix III3D-3A).

The post-settlement floor grades will maintain positive drainage and allow the leachate to drain towards the leachate collection system under the conditions analyzed. The results of the settlement analysis are presented in Appendix III3B-1, [Settlement Analysis](#).

## 2.2 Stability Analysis

The results of the stability analyses indicate that the proposed slopes are stable under the conditions analyzed. For each condition analyzed, the minimum calculated factor of safety exceeds the recommended factor of safety.

Based on the Corps of Engineers "Design and Construction of Levees" manual (EM 1110-2-1913), the recommended factors of safety are 1.3 for short-term and 1.5 for long-term conditions, respectively. Short term conditions include:

- Excavated slopes (undrained conditions);
- Sideslopes; and
- Interior waste slopes.

All other conditions are long-term.

Slope stability analyses were performed using limit equilibrium methods to assess the stability of the proposed landfill. In particular, stability of the proposed excavated landfill sideslopes, stability of the protective cover on landfill sideslopes, stability of the interior waste slopes, overall stability of the final filled landfill, and stability of the final cover system were evaluated.

In general, the analyses consist of the following:

- Characterization of the critical cross-section (e.g., the geometry, geology, geosynthetic interfaces, and groundwater conditions).
- Selection of appropriate strength parameters.
- Analysis under anticipated critical conditions.

The analyses are summarized in the following sections.

Using settlement results, the difference in liner length between prior and post settlement was analyzed. The evaluation showed the liner will mainly be under compression with liner shortening. A very limited portion will experience a lengthening with a strain of 0.3 percent, well below the allowable strain of 5 percent.

An evaluation of strain in the overliner due to localized depressions (subsidence) near the surface of the old waste was performed, and is included as Appendix III3B-3B, Strain Analysis. A parametric analysis, comparing the diameter of the subsidence area and depth at its center to the allowable strain of the overliner components, indicates that the ratio of depth to diameter is approximately 0.14 for 5 percent strain and 0.20 for 10 percent strain.

Depressions of this magnitude would only be expected if voids or highly compressible material are present immediately below the overliner. To reduce the potential for subsidence below the overliner system, the existing waste will be surcharged by placing at least 20 feet of soil for a minimum 3-month period. The surcharge will collapse voids and compress the underlying material.

### 2.3.3 Stability Analysis

Final filled configuration stability analyses were performed using limit equilibrium methods to determine the factors of safety against sliding or failure. Based on a review of the design grades, the reasonable worst-case configuration was assumed to consist of a section along the western side of Units 3 and 4, having 4H:1V final cover slopes to a crest and maximum fill elevation of approximately 312.6 ft-msl. Compared to other sections through the pre-Subtitle D area, the chosen section exhibits thicker existing waste. Additionally, the toe of the future waste along the chosen section is less supported by the perimeter berm.

Potential failure surfaces were analyzed and the minimum factor of safety was computed based on limit equilibrium methods following Spencer's and GLE/Morgenstern-Price methods of analysis using SLIDE Version 7.0, an integrated slope stability analysis program for personal computers. The strength parameters are conservatively estimated or based on test results for similar conditions, and the reasonable worst case configuration.

The results from the method providing the least factor of safety is presented Appendix III3B-3C. The factor of safety is 2.0 for block sliding and 3.0 for circular failure. These values indicate the final-filled configuration will be stable.

## 3.0 LINER DESIGN CRITERIA

30 TAC §§330.331(a)(2) & 330.331(b)

The Pre-Subtitle D cells (Units 4-41 – 4) consist of trench cells extending to a depth of approximately 15 feet below original ground surface. Some of the cells are reported to include a single geomembrane liner.

None of the cells include a leachate collection system. The approximate grades of the Pre-Subtitle D cells are shown on Figure III3B-3A-1.

The liner design for the facility is not composed of “composite liner” components defined by 30 TAC §330.331(b); consisting of at least a 2-foot layer of re-compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/s and a 60-mil high density polyethylene (HDPE) geomembrane liner component.

An alternative liner design is currently approved under permit TCEQ Permit MSW-956B for remaining Subtitle D construction and is the liner design to be used for expansion cells in Unit 7 and Unit 8. The alternative liner design consists of, from bottom up, a geosynthetic clay liner (GCL), a 60-mil high-density polyethylene (HDPE) geomembrane liner, double-side geocomposite composed of a geonet bonded to geotextile on both sides, and 2 feet of protective cover soil. The overliner design discussed in §2.3, Overliner will use 60-mil linear low-density polyethylene (LLDPE) instead of HDPE because its elastic properties are better suited for potential waste settlement. Alternative liner details are included on Figure III3-7, Alternative Liner System Details. Overliner design details and cross-sections are shown on Figures III3-9B, III3-9C, and III3-9D.

As discussed in §4.0, Leachate Collection and Removal System (LCRS) is designed to maintain less than a 30-centimeter depth of leachate over the alternative liner system.

Portions of the landfill excavation extend below the seasonal high water table. Consistent with current practice at the site, toe drains and a geocomposite underdrain along the sideslopes will be installed to control groundwater. The underdrain will be maintained and operated until sufficient ballast is in place to resist the uplift pressures below the liner system. The underdrain analyses are included in Appendix III3E-2. The underdrain system layout and details are shown on Figures III3-6A, III3-6B, and III3-8.

### **3.1 Alternative Liner Design**

30 TAC §330.335

Alternative liner designs, which must include a leachate management system, may be authorized by the TCEQ if a demonstration by computerized design modeling that the maximum contaminant levels detailed in 30 TAC §330.331, Table 1 will not be exceeded at the point of compliance. At the discretion of the TCEQ, a field demonstration may be required to prove the practicality and performance capabilities of an alternative liner design.

The alternative liner design is currently approved under permit TCEQ Permit MSW-956B. The aforementioned factors and any factors not addressed in this application shall be provided to the TCEQ upon request to aid in considerations.

#### **4.0 LEACHATE COLLECTION AND REMOVAL SYSTEM**

30 TAC §§330.331(a)(2) & 330.333

The leachate collection and removal system (LCRS) is designed and constructed to maintain less than a 30-centimeter depth of leachate over the alternative liner system and eliminate potential migration of landfill leachate into groundwater and to meet the requirements of 30 TAC §330.333. The LCRS will collect and remove leachate from the top of the alternative liner, channel leachate to designated leachate collection sumps, and pump leachate from the leachate collection sump into a leachate force main for disposal.

The LCRS drainage layer is comprised of a double-sided geocomposite: a high density polyethylene (HDPE) geonet bonded with geotextile on both sides. The leachate collection system details are presented on Figure III3-8, [Leachate Collection and Removal System and Underdrain Details](#). Leachate is collected from the drainage layers into a leachate collection trench constructed of perforated HDPE piping encased by a drainage aggregate and wrapped in a geotextile filter. The leachate collection trench discharges into leachate collection sumps likewise constructed of drainage aggregate and wrapped in geotextile filter. From within the leachate collection sumps, an HDPE upslope riser pipe houses a pump that removes accumulated leachate from within the leachate collection sumps into a leachate force main for discharge to the public sewer system as depicted on Figures III3-5A and III3-5B.

The LCRS is designed and operated to function through the scheduled closure and post-closure care period of the landfill considering the following factors:

- constructed of materials that are chemically resistant to the leachate expected to be generated
- of sufficient strength and thickness to prevent collapse under the pressures exerted by overlying wastes, waste cover materials, and by any equipment used at the landfill
- estimated rate of leachate removal;
- capacity of sumps;
- pipe material and strength, if used;
- pipe network spacing and grading, if used;
- collection sump materials and strength;
- drainage media specifications and performance; and
- demonstration that pipes and perforations will be resistant to clogging and can be cleaned.

#### 4.3.10 Leachate Collection Sump Capacity

30 TAC §330.333(3)(B)

Appendix III3D-4, Sump Capacity Calculations utilizes typical sump dimensions and porosity of the drainage aggregate to determine leachate capacity. The maximum leachate generated, based on the maximum contributing area and the maximum leachate generation rate provided by Appendix III3D-1, Help Model Evaluation was compared to the sump leachate capacity to determine an estimated time to fill the sump. Based on results, the leachate collection sump design provides adequate capacity and cycle time for leachate pumping.

### 5.0 BALLAST AND DEWATERING SYSTEM

30 TAC §330.337(e)

Waste management unit excavations extend below the seasonal high water table resulting in upward or inward hydrostatic forces on the alternative liner. The alternative liner and the waste placed above it will provide the ballast (weight) to protect the liner system from uplift forces from groundwater. To offset hydrostatic uplift during construction, an active dewatering system will be constructed and operated until sufficient ballast is in place.

#### 5.1 Ballast

30 TAC §330.337(b)(1)

To offset hydrostatic uplift, the weight of the alternative liner and the waste placed above it will provide the ballast (weight) to protect the liner system from uplift forces from groundwater. The ballast counteracting the hydrostatic forces include the soil materials from the leachate collection system components, the protective cover, waste above the liner and leachate collection system, and the soil materials from the interim cover. The weight of the geosynthetic components of the leachate collection system and any geosynthetic components of the interim cover is considered negligible. Appendix III3E-1, Ballast Calculations demonstrate that the ballast, including waste, offset hydrostatic uplift by a factor greater than 1.5. A Ballast Evaluation Report (BER) must be submitted to the TCEQ when the ballast verification demonstrates that further ballasting or dewatering is no longer necessary as outlined in Appendix III3F §8.3, Ballast Evaluation Report.

#### 5.2 Dewatering System

30 TAC §330.337(b)(2)

During construction of the alternative liner, groundwater will be controlled by installing an active dewatering system, which includes an underdrain composed of toe drains, a geocomposite along the sideslopes, and an underdrain sump where removed groundwater will be pumped into adjacent drainage perimeter channel. Appendix III3E-2, Dewatering System Calculations estimates groundwater flow into the underdrain using SEEP/W, a 2-dimensional finite element analysis program, using the worst-case scenario and designs the underdrain system to reduce upward or inward hydrostatic forces on the alternative liner to achieve factor of safety greater than 1.2 against uplift. Figures III3-6A, III3-6B, and III3-8 present design layout and details of the dewatering system.

## **6.0 LINER QUALITY CONTROL PLAN**

### 30 TAC §330.339(a)

Appendix III3F, Liner Quality Control Plan (LQCP), is prepared under the direction of a licensed professional engineer by a Professional Engineer, and it shall be the basis for the type and rate of quality control testing performance and reported in the geosynthetic liner evaluation report (GLER) as required in §30 TAC §330.341. The plan provides operating personnel adequate procedural guidance for assuring continuous compliance with groundwater protection requirements. The plan specifies construction methods employing good engineering practices for installation and testing of components of the alternative liner including geosynthetic clay liner (GCL), geomembrane (GM), leachate collection and removal system (LCRS), and protective cover soil. As discussed in §3.1, the alternative liner design does not include at least a 2-foot layer of re-compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/s; therefore, liner quality control testing procedures for a compacted clay liner are not provided within the LQCP in accordance with 30 TAC §330.339. Also included within the LQCP are special considerations for excavations below the seasonal high groundwater table.

**APPENDIX III3A-1  
VOLUME CALCULATIONS**

## VOLUME CALCULATIONS

Made by: JCW  
Checked by: CEI  
Reviewed by: JBF

### 1.0 SUMMARY

The table below summarizes total disposal capacity (i.e. airspace) for each cover option for the landfill expansion.

Total Airspace (CY)		Construction Options	
		Overliner	Unit 8
Final Cover Options	Standard	84,997,400	84,831,321
	Alternative	85,981,680	85,815,599
	Closure Turf	87,301,156	87,135,076

### 2.0 OBJECTIVE

To determine the airspace gained from the expansion of Edinburg Regional Disposal Facility for two options for the Pre-Subtitle D Units 1 through 4: construction of an overliner above existing Units 1 - 4, and relocation of existing Pre-Subtitle D waste and construction of Unit 8. In addition, three final cover options outlined in Part III7, Closure Plan are considered in the volume calculation.

### 3.0 GIVEN

Approved TCEQ Permit MSW-956B final cover grades and composite lining system grades, expansion design top of waste grades and top of composite lining system grades, and total airspace for approved TCEQ Permits MSW-956A and MSW-956B.

### 4.0 METHOD

Use AutoCAD Civil 3D, a civil engineering software, to compare the expansion top of waste grades to the top of permitted waste grades combined with expansion top of composite lining system grades.

## 5.0 CALCULATIONS

### 5.1 Previously Approved Airspace Capacities

Permit	Capacity (CY)	Description
956A	1,027,858	Pre-Subtitle D Units 1-4
956B	16,734,913	Addition of Units 5 and 6

### 5.2 Expansion Airspace Gained

To determine the expansion volume gained, two surface models are compared: bottom of waste surface developed by combining top of approved TCEQ Permit MSW-956B waste surfaces with expansion top of protective cover surface, and expansion top of waste surfaces.

### 5.2.1 Construction of Overliner option

Comparison of developed bottom of waste surface (combination of expansion protective cover grades including Overliner with TCEQ Permit MSW-956B waste grades) to expansion top of waste grades (developed from expansion final cover grades and thicknesses of the final cover options).

Final Cover	Thickness (ft)	Capacity (CY)
Standard	3.5	68,262,487
Alternative	2	69,246,767
Closure Turf	0	70,566,243

### 5.2.2 Relocation of Pre-Subtitle D waste and construction of Unit 8 option

Comparison of developed bottom of waste surface (combination of expansion protective cover grades including Unit 8 with TCEQ Permit MSW-956B waste grades) to expansion top of waste grades (developed from expansion final cover grades and thicknesses of the final cover options). Please note that airspace gained will be reduced by volume of relocated Pre-Subtitle D waste.

Final Cover	Thickness (ft)	Volume (CY)	Capacity (CY)
Standard	3.5	69,124,266	68,096,408
Alternative	2	70,108,544	69,080,686
Closure Turf	0	71,428,021	70,400,163

## 6.0 CONCLUSION

The total airspace capacity is the sum of TCEQ Permit MSW-956B and expansion airspace gained.

Total Airspace (CY)		Construction Options	
		Overliner	Unit 8
Final Cover Options	Standard	84,997,400	84,831,321
	Alternative	85,981,680	85,815,599
	Closure Turf	87,301,156	87,135,076

**APPENDIX III3B-2E-1**  
**FINAL COVER SYSTEM STABILITY**



## 4.0 METHOD

Create a model representing the sideslope situation and use it in conjunction with limit equilibrium concepts to determine the minimum factor of safety against a sliding block failure along the critical interface.

### Infinite Slope Analysis

$$FS = \frac{c + (\gamma b \cos \beta - \gamma_w d \cos \beta) \tan \phi}{\gamma b \sin \beta}$$

### Sliding at Geocomposite-Textured Geomembrane Interface

$\phi =$	21	interface friction angle
$\beta =$	14.0	slope angle (degrees)
$c =$	0	adhesion (psf)
$\gamma =$	115	unit weight of soil (pcf)
$b =$	2.0	thickness (ft)
$d =$	0	water depth in cover (ft)
$\gamma_w =$	62.4	unit weight of water (pcf)
<b>FS =</b>	<b>1.54</b>	

Based on the Corps of Engineers "Design and Constuction of Levees" manual (EM 1110-2-1913) and the "EPA Guide to Technical Resources for the Design of Land Disposal Facilities", the recommended factor of safety is 1.5 for the veneer slope stability of the final cover.

## 5.0 RESULTS

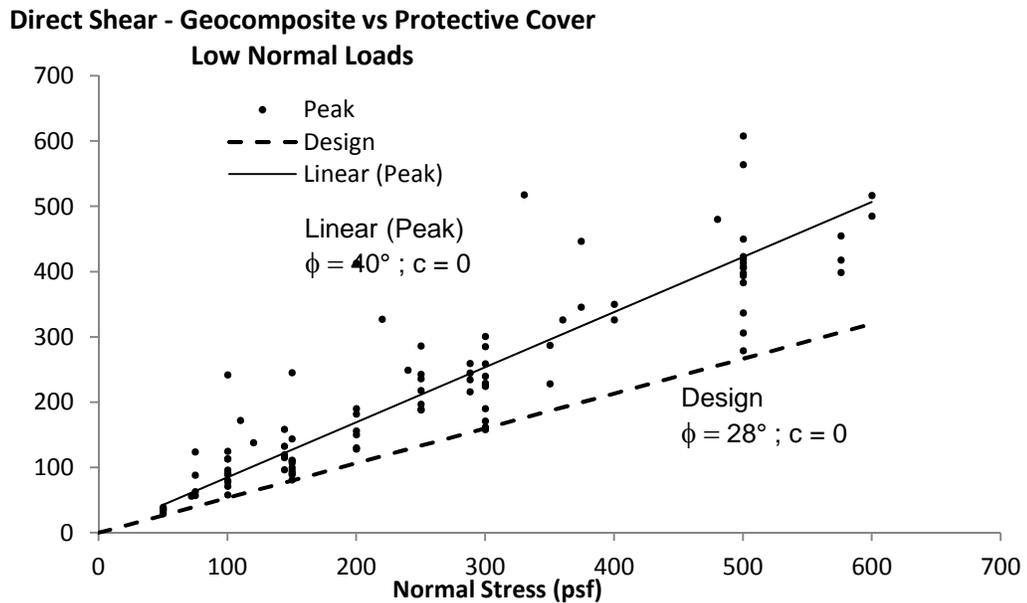
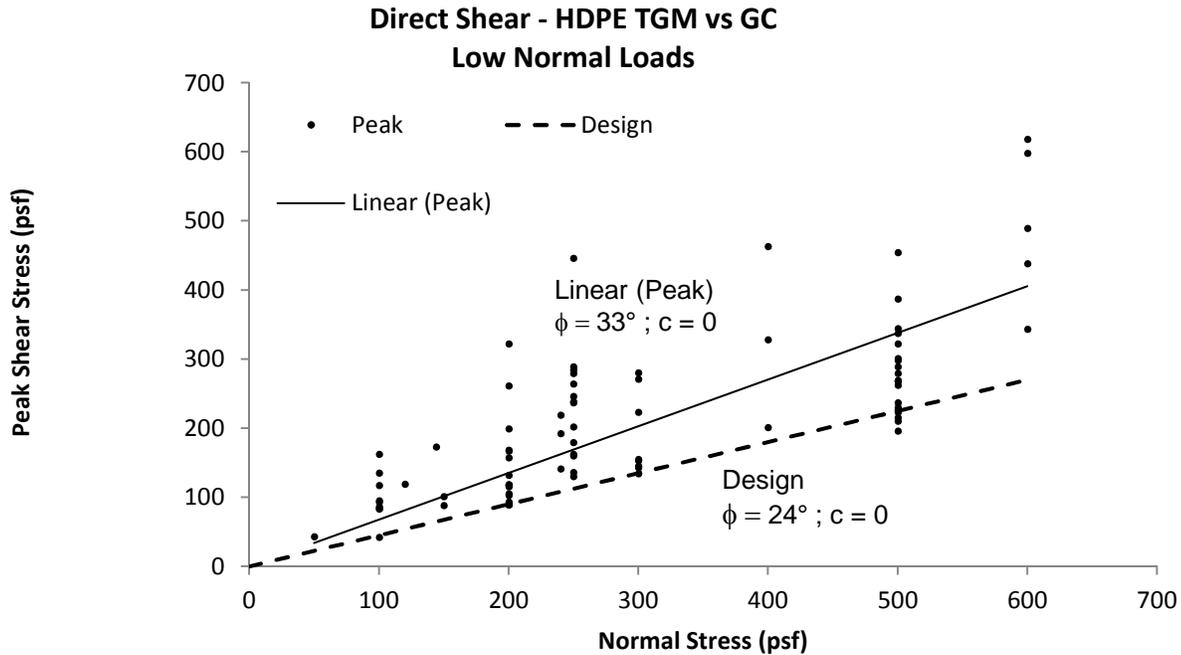
Using the Golder Associates interface friction angle database as a guide, the most critical internal friction angle of the final cover liner system was conservatively assumed to be 21 degrees. The resulting minimum factor of safety was calculated to be 1.54

## 6.0 CONCLUSION

The slope stability analysis indicates that the final cover slope is stable.

## 7.0 REFERENCES

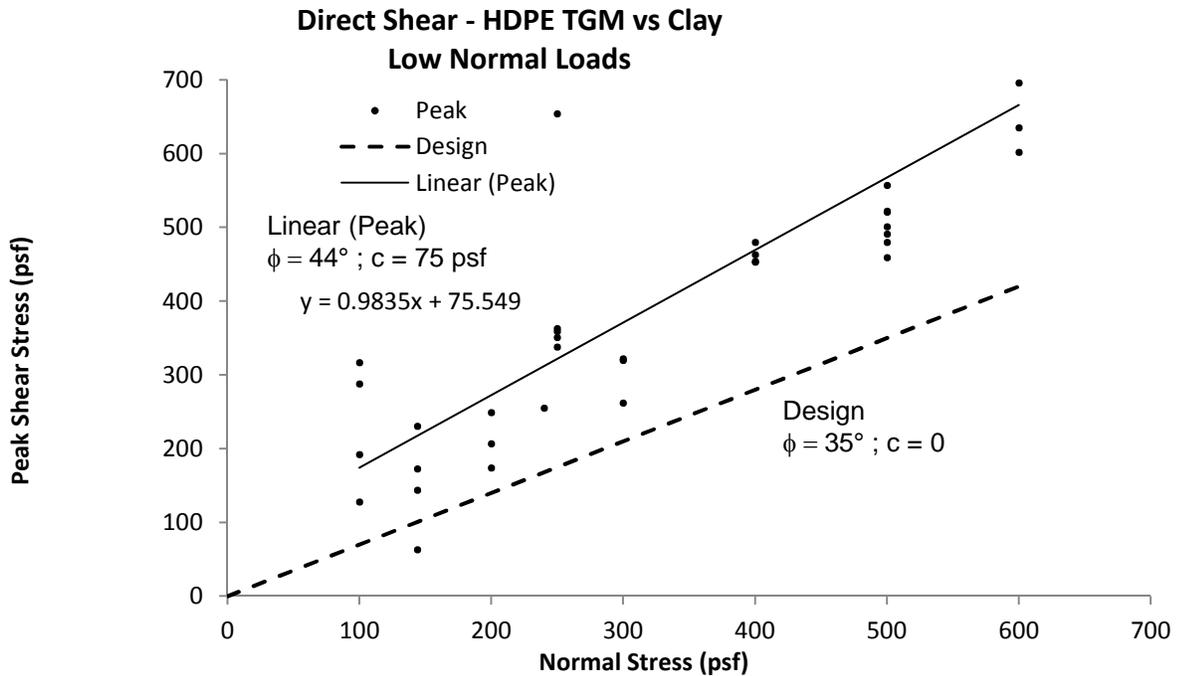
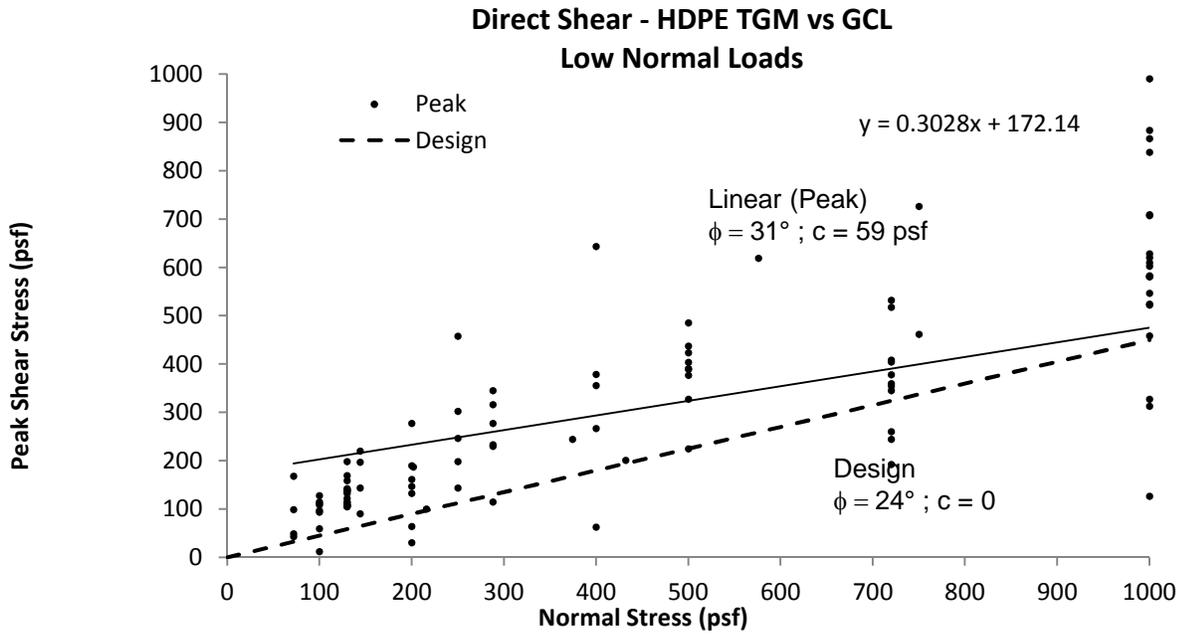
Shear-Normal plots from unpublished data from tests performed in Golder's laboratory.



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Submitted: July 2017

Revised: November 2017



**APPENDIX III3D-4**

**LEACHATE COLLECTION SUMP CAPACITY**

## LEACHATE COLLECTION SUMP CAPACITY

Made by: CEI  
 Checked by: MX  
 Reviewed by: JBF

### 1.0 OBJECTIVE

Calculate the volume and capacity of a typical leachate collection sump and, with this quantity, estimate the sump cycle time.

### 2.0 GIVEN

The typical dimensions for the lateral expansion sumps are provided below. Because sumps for the overliner option are larger in size, their capacities are not evaluated for the purpose of this calculation.

Sump base dimensions: 30 ft long  
 24 ft wide  
 2 ft deep

Sideslopes in sump: 3 :1 (horizontal:vertical)  
 Sump gravel porosity: 0.3

Typically, the transducer and control panel is set to shut down the pump with 1 foot of leachate left in the sump to keep the pump from overheating. Likewise, to maintain less than 30 cm of leachate above the liner system, the transducer and control panel is set to turn on at 0 ft to a maximum of 1 ft above liner. To be conservative for the sump cycle calculations, 0 ft above liner is used.

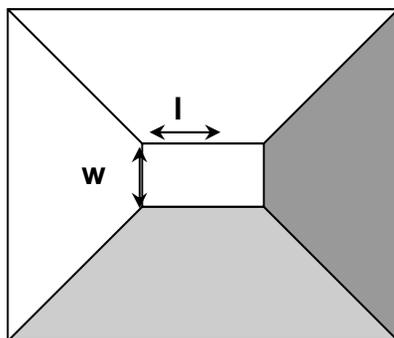
Tranducer Start/Stop Elevations from bottom of sump: 2 ft (start level)  
 1 ft (stop level)

### 3.0 CALCULATIONS

#### 3.1 Total Sump Volume & Sump Capacity

$$V = 1/3 (A_1 + A_2 + (A_1 A_2)^{1/2}) D \quad \text{where}$$

$A_1$  = area at base of sump  
 $A_2$  = area at top of sump  
 $D$  = depth of sump



Plan View



Profile View

$$\text{Sump Capacity} = \text{Gravel Porosity} * \text{Total Sump Volume}$$

Assuming leachate remains at the base of the sump at the set transducer elevation, the remaining void volume in the sump is:

Base Area	Top Area	Depth	Total Vol.	Sump Capacity	
(ft <sup>2</sup> )	(ft <sup>2</sup> )	(ft)	(ft <sup>3</sup> )	(ft <sup>3</sup> )	gallons
1,080	1,512	1	1,290	387	2,895

### 3.2 Time to Fill Sump, Worst-case Conditions

The time it takes to fill the sump when leachate remains at the sump base and worst-case conditions exist is:

Q <sub>max</sub>	Area <sub>max</sub>	Maximum flow into sump			Time to fill sump			
		ft <sup>3</sup> /acre/day	acre	ft <sup>3</sup> /day	gal/day	gal/min	day	hr
956	20.9	19,980	149,453	104	0.02	0.5	28	

The maximum leachate generation rate was computed by the HELP model to be 956 ft<sup>3</sup>/acre/day.

The maximum contributing area is Cell 12A of 20.9 acres.

### 3.3 Time to Fill Sump, Typical Conditions

The time it takes to fill the sump when leachate remains at the sump base and typical conditions exist is:

Q <sub>ave</sub>	Area <sub>max</sub>	Average flow into sump			Time to fill sump			
		ft <sup>3</sup> /acre/yr	acre	ft <sup>3</sup> /day	gal/day	gal/min	day	hr
12,494	20.9	715	5,351	4	0.15	3.5	209	

The maximum average annual leachate generation rate was computed by the HELP model to be 12,494 ft<sup>3</sup>/acre/yr.

The maximum contributing area is Cell 12A of 20.9 acres.

### 3.4 Sump Cycle Times

Sump cycles times should be greater than 15 minutes or number of cycles should not be greater than 100 cycles per day to prevent overheating and complete failure. The cycle time is the time to remove two sump volumes.

Worse-case Condition			Typical Condition		
min	day	cycles/day	min	day	cycles/day
56	0.04	26	418	0.29	3

## 4.0 CONCLUSION

Each sump will have a capacity of approximately 2,895 gallons. Under worst-case conditions, leachate will reach the crest of the sump approximately 0.5 hours after pumping. Under typical conditions, leachate will reach the crest of the sump approximately 3.5 hours after pumping. Therefore, the sump design will provide adequate time for sump cycling.

**APPENDIX III3E-1**

**SUFFICIENT BALLAST CALCULATIONS**

## SUFFICIENT BALLAST CALCULATIONS

Made by: CEI  
Checked by: MX  
Reviewed by: JBF

### 1.0 OBJECTIVE

Provide ballast calculations in accordance with Appendix III3F, Liner Quality Control Plan (LQCP).

### 2.0 APPROACH

The factor of safety against hydrostatic uplift is defined as the sum of the resisting forces provided by the ballast (weight) of overlying materials including protective soil cover, waste, and final cover, divided by the hydrostatic uplift forces acting at the base of the geomembrane liner. As described in the LQCP, a factor of safety of 1.5 is required when waste is being used as the ballast material.

### 3.0 EXAMPLE BALLAST CALCULATIONS

Provided below are example calculations demonstrating the factor of safety in the final fill condition and the waste thickness required to achieve a factor of safety of 1.5.

Final-Filled Condition		Ballast Offset (lb)			Hydrostatic Force (lb)	
Slope of Alternative Liner at Evaluation Point	3 H:1V	<i>Final Cover</i>	<i>Waste</i>	<i>Protective Cover</i>	<i>Alternate Liner</i>	<i>Ground-water</i>
Top Elevation (ft-msl)		120.0	116.5	74.0	72.0	75.8
Thickness (ft)		3.5	42.5	2.0	-	3.8
Unit Weight (pcf)		115.0	44.0	105.0	-	62.4
<b>Hydrostatic Offset Factor</b>	<b>9.4</b>	2234.3			237.1	

Waste Thickness Required		Ballast Offset (lb)		Hydrostatic Force (lb)	
Slope of Alternative Liner at Evaluation Point	3 H:1V	<i>Waste</i>	<i>Protective Cover</i>	<i>Alternate Liner</i>	<i>Ground-water</i>
Top Elevation (ft-msl)		79.9	74.0	72.0	76.5
Thickness (ft)		<b>5.9</b>	2.0	-	4.5
Unit Weight (pcf)		44.0	105.0	-	62.4
<b>Hydrostatic Offset Factor</b>	<b>1.5</b>	421.2		280.8	

#### 4.0 CALCULATIONS AND RESULTS

Final filled condition and waste thickness required ballast calculations for each evaluation point within the lateral expansion area of Units 7 and 8 as well as remaining cell construction in Unit 6 as depicted in Figure III3E-1-1 is summarized in the tables below. The evaluation points provided represent the worse-case locations for each unit cell. The final cover, protective cover, and alternate liner elevations are the same for each ballast evaluation point. In addition, the final cover and protective cover thickness as well as associated unit weight is assumed to be the same as the sample calculation provided above.

Final-Filled Condition	Factor of Safety	Component Elevations				
		Final Cover	Waste	Protective Cover	Alternate Liner	Ground-water
Point 1 - Unit 7, Cell 1	<b>8.5</b>	120.0	116.5	74.0	72.0	76.2
Point 2 - Unit 7, Cell 2	<b>8.7</b>	120.0	116.5	74.0	72.0	76.1
Point 3 - Unit 7, Cell 3	<b>9.4</b>	120.0	116.5	74.0	72.0	75.8
Point 4 - Unit 7, Cell 4	<b>9.2</b>	120.0	116.5	74.0	72.0	75.9
Point 5 - Unit 7, Cell 5	<b>8.5</b>	120.0	116.5	74.0	72.0	76.2
Point 6 - Unit 7, Cell 6	<b>NA</b>	120.0	116.5	74.0	72.0	70.2
Point 7 - Unit 7, Cell 7	<b>NA</b>	120.0	116.5	74.0	72.0	71.8
Point 8 - Unit 7, Cell 8	<b>19.9</b>	120.0	116.5	74.0	72.0	73.8
Point 9 - Unit 7, Cell 9	<b>10.9</b>	120.0	116.5	74.0	72.0	75.3
Point 10 - Unit 7, Cell 10	<b>9.2</b>	120.0	116.5	74.0	72.0	75.9
Point 11 - Unit 7, Cell 11	<b>8.3</b>	120.0	116.5	74.0	72.0	76.3
Point 12 - Unit 7, Cell 12	<b>8.0</b>	120.0	116.5	74.0	72.0	76.5
Point 13 - Unit 8, Cell 1A	<b>6.8</b>	120.0	116.5	74.0	72.0	77.3
Point 14 - Unit 8, Cell 1B	<b>5.3</b>	120.0	116.5	74.0	72.0	78.7
Point 15 - Unit 8, Cell 2A*	<b>7.0</b>	120.0	116.5	74.0	72.0	77.1
Point 16 - Unit 8, Cell 2B*	<b>6.1</b>	120.0	116.5	74.0	72.0	77.9
Point 17 - Unit 6, Cell 5B	<b>7.2</b>	120.0	116.5	74.0	72.0	77.0
Point 18 - Unit 6, Cell 7A	<b>7.6</b>	120.0	116.5	74.0	72.0	76.7
Point 19 - Unit 6, Cell 6B	<b>7.5</b>	120.0	116.5	74.0	72.0	76.8

NA: Groundwater elevation is below liner elevation.

\* Unit 8 evaluation point similar to that of overliner option.

Waste Thickness Required	Waste Thickness	Factor of Safety	Component Elevations			
			Waste	Protective Cover	Alternate Liner	Ground-water
Point 1 - Unit 7, Cell 1	5.2	1.5	79.2	74.0	72.0	76.2
Point 2 - Unit 7, Cell 2	4.9	1.5	78.9	74.0	72.0	76.1
Point 3 - Unit 7, Cell 3	4.2	1.5	78.2	74.0	72.0	75.8
Point 4 - Unit 7, Cell 4	4.4	1.5	78.4	74.0	72.0	75.9
Point 5 - Unit 7, Cell 5	5.2	1.5	79.2	74.0	72.0	76.2
Point 6 - Unit 7, Cell 6	0.0	1.5	74.0	74.0	72.0	70.2
Point 7 - Unit 7, Cell 7	0.0	1.5	74.0	74.0	72.0	71.8
Point 8 - Unit 7, Cell 8	0.0	1.5	74.0	74.0	72.0	73.8
Point 9 - Unit 7, Cell 9	3.0	1.5	77.0	74.0	72.0	75.3
Point 10 - Unit 7, Cell 10	4.4	1.5	78.4	74.0	72.0	75.9
Point 11 - Unit 7, Cell 11	5.4	1.5	79.4	74.0	72.0	76.3
Point 12 - Unit 7, Cell 12	5.9	1.5	79.9	74.0	72.0	76.5
Point 13 - Unit 8, Cell 1A	7.8	1.5	81.8	74.0	72.0	77.3
Point 14 - Unit 8, Cell 1B	11.1	1.5	85.1	74.0	72.0	78.7
Point 15 - Unit 8, Cell 2A*	7.3	1.5	81.3	74.0	72.0	77.1
Point 16 - Unit 8, Cell 2B*	9.2	1.5	83.2	74.0	72.0	77.9
Point 17 - Unit 6, Cell 5B	7.0	1.5	81.0	74.0	72.0	77.0
Point 18 - Unit 6, Cell 7A	6.3	1.5	80.3	74.0	72.0	76.7
Point 19 - Unit 6, Cell 6B	6.6	1.5	80.6	74.0	72.0	76.8

\* Unit 8 evaluation point similar to that of overliner option.

## 5.0 CONCLUSION

A ballast calculation was performed at each evaluation point depicted on Figure III3E-1-1 within the lateral expansion area of Unit 7. The evaluation point number 12 selected within Cell 12 where the difference between the seasonal high groundwater surface and the design basegrade is the greatest is the worst-case scenario. The final filled condition has a factor of safety of 8.0 and 5.9 ft is the thickness of waste required to achieve a factor of safety of 1.5. Review of the results indicate that long-term ballast is adequate for the proposed design.

**APPENDIX III3F**  
**LINER QUALITY CONTROL PLAN**



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 3, Appendix F

# LINER QUALITY CONTROL PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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## 1.0 PURPOSE

### 1.1 Purpose

30 TAC §330.339(a)

This Liner Quality Control Plan (LQCP), is prepared under the direction of a licensed professional engineer, and it is the basis for the type and rate of quality control testing performance and reported in the ~~geosynthetic~~ liner evaluation report (GLER) as required in §30 TAC §330.341. The plan provides operating personnel adequate procedural guidance for assuring continuous compliance with groundwater protection requirements. The plan specifies construction methods employing good engineering practices for installation and testing of components of the alternative liner including geosynthetic clay liner (GCL), geomembrane (GM), leachate collection and removal system (LCRS), and protective cover soil. In addition, dewatering plans are included.

### 1.2 Liner Quality Control Testing Procedures

30 TAC §330.339(a)(2)

The liner quality control testing procedures, including sampling frequency, are provided in this LQCP. All field sampling and testing, both during construction and after completion, shall be performed by a person acting in compliance with the provisions of the Texas Engineering Practice Act and other applicable state laws and regulations. The professional of record who signs the GLER or his representative should be on site during all liner construction. Quality control of construction and quality assurance ~~of~~ sampling and testing procedures should follow the latest technical guidelines of the TCEQ ~~30 TAC 330.339(a)(2)~~.

## 2.0 GEOSYNTHETIC CLAY LINER

This section presents general procedures, quality control testing requirements, and installation procedures for geosynthetic clay liner (GCL) construction. The GCL approved for use at the site consists of sodium bentonite encapsulated between two geotextile layers, needle-punched or stitched-bonded together.

### 2.1 Pre-Installation Material Evaluation

#### 2.1.1 Manufacturer's Quality Control Certificates

Prior to the installation of the GCL, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. The manufacturer must provide documentation certifying the material was continuously inspected for broken needles, and is needle free. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in accordance with project-specific testing methods and subject to the minimum testing frequency shown in Table III3F-1, GCL QC Submittal Frequency & Material Specifications. The owner may require more frequent testing at his discretion.

The quality control testing may be performed in the manufacturing plant. The POR shall review the test results prior to accepting the GCL to ensure that the certified minimum properties meet the values presented in Table III3F-1, [GCL QC Submittal Frequency & Material Specifications](#).

### **2.1.2 Conformance Testing**

In addition to the manufacturer's quality control certificates, samples of rolls of GCL will be obtained for conformance testing. The samples shall be tested by an independent third party laboratory in accordance with Table III3F-2, [GCL Conformance Test Schedule](#). The POR shall review the test results to ensure that they meet the values presented in Table III3F-1, [GCL QC Submittal Frequency & Material Specifications](#).

The POR shall compare measured shear strength values to those used in the stability analyses included in Appendix III3B-2B, III3B-2C, and III3B-2D. If the measured interface shear strength is less than the values used in the analyses, the stability of the liner system shall be reassessed and revised calculations shall be included in the [Geosynthetic-Liner Evaluation Report \(GLER\)](#).

### **2.1.3 Shipping and Unloading**

In order to prevent premature hydration, the GCL rolls shall be shipped in plastic wrapping that shall remain intact until material installation. [Rolls shall be labeled with the manufacturers name, product identification, roll and lot number, roll dimensions, weight and any other information to trace the quality assurance documentation.](#) Upon delivery of the GCL, storage and handling procedures shall be documented. The rolls will be stacked, stored [above ground, covered](#), and handled in accordance with ASTM D5888 or manufacturer's recommendations. [If any rolls is damaged during shipping, unloading or storage or if the outer portion becomes partially hydrated, the damaged portion shall be removed before the roll is deployed.](#)

**Table III3F-1: GCL QC Submittal Frequency & Material Specifications**

<b>Bentonite</b>					
Property	Qualifier	Unit	Value	Test Method <sup>(1)</sup>	Frequency
Fluid Loss	max.	ml	18	ASTM D5891	1 per 50 tons or every truck or railcar
Free Swell	min.	ml	24	ASTM D5890	
<b>Geotextile</b>					
Property	Qualifier	Unit	Value	Test Method <sup>(1)</sup>	Frequency
Mass per Unit Area	—	g/cc	—	ASTM D5261	1 per 200,000 ft <sup>2</sup>
Tensile Properties:	—	lb	—	ASTM D4632	
<b>GCL Product</b>					
Property	Qualifier	Unit	Value	Test Method <sup>(1)</sup>	Frequency
Bentonite Mass	min.	lb/ft <sup>2</sup>	0.8	ASTM D5993	1 per 40,000 ft <sup>2</sup>
Bentonite Moisture Content	—	%	—	ASTM D5993	
Grab Tensile Strength	—	lb	—	ASTM D6768	1 per 200,000 ft <sup>2</sup>
Hydraulic Flux	max.	m <sup>3</sup> /m <sup>2</sup> -s	1 x 10 <sup>-8</sup>	ASTM D5887	1 per week for each production line <sup>(2)</sup>
<u>Lap Joint Permeability</u>	<u>Max</u>	<u>cm/sec</u>	<u>1 x 10<sup>-8</sup></u>	<u>Flow Box or other suitable device</u>	<u>1 per material and lap type</u>

Notes:

- Updated methods may be implemented based on a review by the POR.
- Report last 20 test values, ending on production date of supplied GCL.
- For those properties that do not indicate a value, the GCL material must meet the manufacturer's minimum specification.

**Table III3F-2: GCL Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Bentonite Mass/Unit Area	ASTM D5993	Not less than 1 test per 100,000 ft <sup>2</sup>
Hydraulic Flux	ASTM D5887	
Direct Shear <sup>(2)(3)</sup>	ASTM D6243	1 test per GCL/adjoining material

Notes:

- Updated methods may be implemented based on a review by the POR.
- Direct shear testing shall be performed on the GCL/geomembrane/geocomposite sandwich. Soak interface and apply normal stresses of 1000, 5000, and 18,000 psf for at least 1 hour prior to shearing at a displacement rate of 0.04 in/min.
- The testing results shall be compared to the values used in the stability analyses included in the Appendix III3B-3B. If the measured interface shear strength is less than the values used in the analyses, the stability of the liner system shall be reassessed and revised calculations shall be included in the GLER.
- Test results from materials used during one construction event may be used in subsequent events provided the materials used are the same and approved by the POR.

## 2.2 Installation Procedures

### 2.2.1 GCL Subgrade Preparation

Surfaces to be lined should be smooth and free of all rocks greater than 0.75-inch diameter (or as recommended by the manufacturer, if less than 0.75 inches), sharp/angular objects, sticks, roots, or debris of any kind. The surface should provide a firm, unyielding foundation for the GCL with no sudden, sharp, or abrupt changes or break in grade. The subgrade surface shall be prepared by rolling with a smooth-drum roller to minimize the roughness and press down protruding soil or rock particles prior to GCL deployment. Loose rocks and/or dry soil particles that could damage the GCL shall be removed. Excessive voids or dimples shall be filled with soil.

Standing water or excessive moisture on the subgrade will not be allowed. The subgrade shall be maintained in a smooth, uniform, and drained condition.

### 2.2.2 Anchor Trench Construction

The anchor trench shall be constructed according to the project plans and specifications, and the excavation and backfilling operations shall be documented. If the anchor trench is excavated in a clay material susceptible to desiccation, the amount of anchor trench open at any time should be minimized. The inside edge of the trench shall be rounded so as to avoid stresses from sharp bends in the GCL. The GCL will not be placed into the anchor trench on top of any rocks greater than 0.75-inch diameter, sharp/angular objects, sticks, roots, or debris of any kind. The anchor trench shall be adequately drained to prevent ponding or hydration of the GCL while the trench is open. The anchor trench shall be backfilled and compacted according to the project plans and specifications; however, backfilling shall be performed, at a minimum, with ordinary compaction as deemed suitable by the POR.

### 2.2.3 GCL Deployment

Equipment used to deploy GCL must not cause excessive rutting of the subgrade. Deployed GCL panels should contain no folds or excessive slack. Installation personnel must not smoke or wear damaging shoes on GCL. GCL should not be placed during excessive winds. Sand bags should be used to anchor deployed GCL when necessary. In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the GCL. If the POR or CQA monitor observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Generators, gasoline or solvent cans, tools, or supplies must not be stored directly on the GCL. GCL must be rolled into position, not drug across the subgrade. Deployed GCL must not be used as a work area without adequate protection such as a rub sheet.

Panels should be overlapped and seamed, as recommended by the manufacturer. End-to-end seams on sideslopes are not allowed. Care must be taken to assure the GCL is installed with the proper side up.

~~should be kept to a minimum. If end-to-end seams on sideslopes are necessary (i.e., if the GCL roll lengths are insufficient to cover the entire slope length), a minimum overlap of 5 feet will be required and may be placed only in the lower half of the slope and must be staggered.~~

GCL deployment shall be limited to the amount that can be covered with the overlying geomembrane liner the same day. GCL deployment shall not be undertaken during precipitation or when there is an impending threat of precipitation. GCL deployed on 5Hh:IV or steeper slopes shall be rolled down the slopes, not cross slope.

Following deployment, the CQA monitor shall visually examine the entire surface of the GCL for even bentonite distribution, thin spots, or other panel defects. All defects will be recorded and repaired in accordance with this LQCP. The QA/QC representative shall also verify the following:

- Proper overlap during deployment
- Seams between GCL panels are constructed per manufacturer's recommendations
- Defects are patched and overlapped properly
- The bentonite has not become excessively hydrated
- No stones, tools, cutting blades or other objects that could damage the GCL are present on the GCL.

Excessively hydrated GCL shall be removed and replaced with new material. Geomembrane shall not be placed on hydrated GCL.

GCL panels shall be given an identification code, mapped, and logged to record relevant installation information.

#### **2.2.4 GCL Repairs**

Torn or otherwise damaged geosynthetic facing must be patched with the same type of geosynthetic. The geosynthetic patch must extend at least 12 inches beyond the damaged area and must be heat bonded, or otherwise attached to the main GCL to avoid shifting during placement of overlying geosynthetics. If the GCL damage includes loss of bentonite, the patch must consist of full GCL extending at least 12 inches beyond the damaged area. Lapping procedures must be the same as specified for original laps of GCL panels.

#### **2.2.5 GCL Protection**

The overlying geosynthetics and soil layers shall be deployed in such a manner as to ensure that the GCL is not damaged. Textured geomembranes shall not be dragged across previously installed GCL. A smooth rubsheet shall be placed between the GCL and textured geomembrane to prevent damage. The rubsheet

will be removed when the geomembrane is in position. Other methods may be employed at the POR's discretion.

To avoid local bentonite displacement, and the possible impact on the hydraulic performance of a GCL, the protective cover soil of suitable thickness should be placed over the geomembrane and geocomposite overlying the GCL as soon as practicable following completion of the geomembrane and leachate collection system construction.

### 3.0 GEOMEMBRANE LINER

This section presents general procedures, quality control testing requirements, and construction specifications for geomembrane liner construction. The alternative liner design includes the use of a 60-mil high-density polyethylene (HDPE) geomembrane liner with an exception for the overliner option which includes the use of a 60-mil linear low-density polyethylene (LLDPE) because its elastic properties are better suited for potential waste settlement.

#### 3.1 Pre-installation Material Evaluation

##### 3.1.1 Manufacturer's Quality Control Certificates

Prior to the installation of any geomembrane, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in the manufacturing plant using the test methods and frequencies listed in the most recent version of the Geosynthetic Research Institute (GRI) test method GM13 for HDPE geomembrane and GM17 for LLDPE geomembrane. Recycled or reclaimed materials must not be used in the manufacturing process. The owner may require more frequent testing at his/her discretion.

The POR shall review the test results prior to accepting the geomembrane to assure that the certified minimum properties meet the minimum values for textured geomembranes, as determined by the most recent GRI test method GM13 or GM17. The current versions of the GRI test methods are included in Appendix III3F-1.

~~The rolls delivered to the site shall be inventoried, recording the manufacturer's name and product identification, and the roll thickness, number, and dimensions. Manufacturer's certificates should be cross-referenced to rolls delivered on-site.~~

Resumes of the installer's supervisor(s) or Master Seamer(s) shall be obtained to verify that adequate seaming experience will be utilized on the project. The installer's supervisor or Master Seamer shall have had experience totaling a minimum of 2,000,000 square feet of geomembrane installation.

~~Upon delivery of geosynthetic materials, storage and handling procedures shall also be documented. Rolls of geosynthetic materials shall be handled and stored in such a way as not to damage the material. As a general rule, rolls of geosynthetic materials should not be stacked more than four rolls high.~~

### 3.1.2 Conformance Testing

In addition to the manufacturer's quality control certificates, samples of the geomembrane will be obtained either at the manufacturing facility or upon delivery to the site for conformance testing. The test samples shall be obtained for conformance testing in accordance with the testing schedule shown in Table III3F-3, Geomembrane Conformance Test Schedule. Testing must be performed by an independent third party laboratory.

The POR shall review the test results to ensure that they meet the values presented in Table III3F-3, Geomembrane Conformance Test Schedule.

**TABLE III3F-3: Geomembrane Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Thickness (laboratory measurement)	ASTM D5994 (Textured)	<u>Not less than 1 test per 50,000 ft<sup>2</sup> and every resin lot.</u>
Density	ASTM D1505 or D792	Not less than 1 test per 100,000 ft <sup>2</sup> with not less than 1 per resin lot
Carbon black content	ASTM D4218	
Carbon black dispersion	ASTM D5596	
Tensile properties	ASTM D6693, Type IV	

Notes:

- Updated ASTM or GRI methods may be implemented based on a review by the POR.

### 3.1.3 Shipping and Storage

Each roll shall be labeled with the manufacturing name, product identification, roll and lot number, dimensions, weight and any other information to trace quality assurance documentation. Upon delivery, storage and handling procedures shall be documented. Rolls shall be stacked, stored and handled in accordance with ASTM D5888 or the manufacturers recommendations. As a general rule, rolls should not be stacked more than four rolls high, and must be handled in a manner that does not damage the material. If any roll is observed to be damaged during shipping, unloading or storage, the damaged portion shall be removed before the roll is deployed.

The rolls delivered to the site shall be inventoried, recording the manufacturer's name and product identification, and the roll thickness, number, and dimensions. Manufacturer's certificates should be cross-referenced to rolls delivered on-site.

## 3.2 Installation Procedures

### 3.2.1 Geomembrane Deployment

The geomembrane shall be installed in direct and uniform contact with the GCL. The geomembrane shall not be placed during inclement weather, such as high winds or rain. Deployment of the geomembrane must not damage the underlying GCL. Geomembrane shall be unrolled, not drug across the GCL.

Geomembrane seaming should generally not take place when ambient temperatures are below 32 degrees Fahrenheit (°F), unless preheating is used. For extrusion welding, preheating will be required if the temperature is below 32°F and follow the procedures in the Geosynthetic Research Institute (GRI) Test Method GM-9. For fusion welding, preheating may be waived if the installer demonstrates that quality welds may be obtained without preheating. Seaming shall not be permitted at ambient temperatures above 104°F, unless the installer can demonstrate that seam quality is not compromised.

In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geomembrane or GCL. If the POR observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Personnel working on the geomembrane shall not smoke, wear damaging shoes, or engage in any other activity likely to damage the geomembrane. Only those sections that are to be placed and seamed in one day should be unrolled. Panels left unseamed should be anchored with sandbags or other suitable weights. In general, seams should be oriented parallel to the line of maximum slope (i.e., oriented up and down, not across the slope). In corners and odd-shaped geometric locations, the number of field seams should be minimized. If end seams are necessary on the sideslope, locate them in the lower half of the slope. Seams that join the side slope panels to the floor should be located at least 5 feet from the toe of the slope.

Panels should be overlapped, as recommended by the manufacturer, as appropriate for the type of seam welding to be performed; however, overlapping shall be no less than 2-3 inches and shall be verified by the POR or the CQA monitor. Field seaming shall only be performed by the method(s) approved by the manufacturer, either by extrusion welding or double-tracked fusion welding. No seaming shall take place without the installer's supervisor or Master Seamer and CQA monitor being present. Fishmouths, or wrinkles at the seam overlap, shall be cut along the ridge of the wrinkle to achieve a flat overlap. The cut shall be seamed and/or patched. Seams shall extend to the outside edge of panels placed in the anchor trench.

Panel layout and field seams shall be given an identification code, mapped, and logged to record relevant installation information. Inspection and testing records shall be logged as well as repair and retest data. Section 7.0 includes a thorough list of items to be documented during geomembrane construction and testing.

### 3.3 Installation Monitoring and Testing

#### 3.3.1 Trial Seams

Each day prior to commencing field seaming, trial seams shall be made on pieces of geomembrane material to verify that conditions are adequate for production seaming. Trial seams shall be made at the beginning of each seaming period and shift (generally, at least twice each day) for each combination of production seaming machine and operator to be used that day. The trial test seam shall be at least 3 feet long by 1 foot wide (after seaming) with the seam centered lengthwise. Four 1-inch wide specimens shall be die-cut from the trial seam sample using a calibration field extensometer. Two specimens shall be tested in the field for shear and two for peel (test both inner and outer welds for dual track fusion welding) and shall be compared to the minimum seam strength requirements specified in the most current version of the Geosynthetic Research Institute, GRI Test Method GM19. The current versions of the GRI test methods are included in Appendix III3F-1. A copy of the current calibration certificate for the extensometer must be provided by the installer.

If any of the trial seam specimens fail, the entire trial seam operation shall be repeated. If an additional specimen fails during the second trial seam, the seaming machine and seamer shall not be used for seaming until the deficiencies are corrected and two consecutive successful trial seams are achieved. Additional trial seams shall be performed if frequent field seaming problems are experienced or if power to the seaming machines is interrupted sufficiently long to require rewarming.

#### 3.3.2 Non-Destructive Testing

Continuous, non-destructive testing shall be performed on all seams by the installer. All leaks must be isolated and repaired by following the procedures described in this LQCP.

Air Pressure Testing – ASTM D5820. The ends of the air channel of the dual-track fusion weld must be sealed and pressured to approximately 30 pounds per square inch (psi), if possible. The air pump must then be shut off and the air pressure observed after 2-5 minutes. A loss of less than 3-4 psi is acceptable if it is determined that the air channel is not blocked between the sealed ends. A loss greater or equal to 3-4 psi indicates the presence of a seam leak that must then be isolated and repaired by following the procedures described in this LQCP. The POR or his/her qualified representative must observe and record all pressure gauge readings.

Vacuum-Box Testing – ASTM D5641. Apply a vacuum of approximately 4 to 8 psi to all extrusion welded seams that can be tested in this manner. The seam must be observed for leaks for at least 10 seconds while subjected to this vacuum. The POR or his/her qualified representative must observe 100% of this testing.

Other Testing. Other non-destructive testing must have prior written approval from the TCEQ.

#### 3.3.3 Destructive Seam Testing

Destructive samples shall be taken at a minimum frequency of one test location, selected randomly, within each 500 linear feet of seam length, inclusive of both primary longitudinal and cross seams, cap strips, and repairs 20 square feet or larger. Each test sample should be of sufficient length and 12 inches wide with

the seam located in the middle. Test specimens, approximately 1 inch wide, shall be cut from both ends of the sample for field testing (peel and shear). The remaining sample should be cut into three parts (one for quality assurance laboratory testing, one for installer quality control laboratory testing, and one for archive storage to be maintained at a location selected by the owner).

The field tests shall be conducted on a certified calibrated ~~tensiometer~~extensometer capable of maintaining a constant extension rate of 2 inches per minute. If one of the field test specimens from the ends of the destructive sample fails, then the seam will be considered to have failed, and repairs shall be initiated as described below. If both specimens pass, then a sample for laboratory testing will be sent to the quality assurance laboratory for testing in both peel and shear. Seam strengths for HDPE geomembranes shall meet the minimum values specified in the most current version of the Geosynthetic Research Institute, GRI Test Method GM19 "Seam Strength and Related Properties of Thermally Bonded Polyolefin Geomembranes".

Destructive test results for both field and laboratory tests shall include qualitative data, including the location of the failure and locus-of-break code, as described in ASTM D6392. Peel tests on double-tracked fusion welds shall be performed on both inside and outside tracks of the weld. Seam break classifications for extrusion and fusion welds are shown on Figures III3F-1 and III3F-2, respectively.

At a minimum, a destructive test must be done for each welding machine used for seaming or repairs. A sufficient amount of the seam must be removed to conduct field testing, independent laboratory testing, and archiving of enough material to retest the seam when necessary. Destructive seam testing locations shall be cap-stripped and the cap completely seamed by extrusion welding to the geomembrane. Capped sections shall be non-destructively tested. Additional destructive test samples may be taken if deemed necessary by the POR or his/her qualified representative.

Weld Acceptance Criteria: For HDPE seams, the minimum passing criteria for destructive seam testing are described in the Geosynthetic Institute, GRI Test Method GM19. The POR must use the most current version of GM19 when evaluating welded seams.

Seam Failure Delineation: When a sample fails a destructive test, the installer shall trace the welding path to an intermediate location at least 10 feet in each direction, or a distance determined by the POR, from the point of the failed test and take 1-inch wide specimens for an additional set of field tests. If these additional samples pass the tests, then two laboratory destructive samples shall be taken adjacent to the intermediate locations or at locations determined by the POR or his/her representative. If these laboratory samples pass the tests, then the seam shall be repaired between these locations. If either sample fails, then the process shall be repeated to establish a zone where the seam should be repaired. All acceptable repaired seams shall be bounded by two locations from which samples passing laboratory destructive tests have been taken.

Seam Failure Repairs: Any portion of the geomembrane exhibiting a flaw or failing a destructive or non-destructive test shall be repaired. Repair methods may include spot welding (extrusion) for minor flaws and punctures; patches for larger holes and tears; capping for large lengths of

failed seams or panel damage; and extrusion welding of outer flap to repair an inadequate fusion seam (less than 100-foot cumulative length) that has an exposed edge.

For any repair method, the following provisions shall be satisfied:

- Surfaces of the geomembrane that are to be repaired using extrusion methods shall be ground no more than one hour prior to the repair.
- All surfaces shall be clean and dry at the time of repair.
- Patches or caps shall extend at least 6 inches beyond the edge of the defect, and all corners of patches shall be rounded with a radius of approximately 3 inches.
- All repairs shall be non-destructively tested, as previously described.
- All seaming equipment, personnel, and operation procedures used in repair work shall meet the same requirements as for new seaming operations.

The POR or his/her qualified representative shall observe all non-destructive testing of repairs and shall record the number of each repair, type, date, and test outcome. Repairs that pass the non-destructive tests shall be taken as an indication of an adequate repair. Repairs more than 150 feet long shall also be required to have a destructive test performed. Repairs that fail the initial retest shall be redone and retested until a passing test results. All work and testing of repairs shall be fully documented in a repair log.

When placing overlying material on the geomembrane, effort must be made to minimize wrinkle development. If possible, cover should be placed during the coolest weather available. Small wrinkles should be isolated and covered as quickly as possible to prevent their growth. In no case shall the geomembrane be allowed to fold over on itself.

## 4.0 LEACHATE COLLECTION SYSTEM

### 4.1 Leachate Collection System and Drainage Materials

The leachate collection trenches and sumps shall be constructed in conjunction with liner construction. All GCL and geomembrane testing shall be completed prior to installing the leachate collection system on the area under evaluation. The locations of the trenches and sumps and design details are shown on the Figures III3-2A, III3-2B, III3-6A, III3-6B, and III3-8. The installation of the leachate collection system and protective cover system will have continuous inspection by the POR or his/her qualified representative(s). Quality assurance monitoring shall consist of measuring the dimensions of the excavated trenches and sumps, and documenting that the pipe, geotextile filters, bedding materials and drainage layers have been placed in accordance with the design details. All data and observations regarding construction of the leachate collection system shall be documented in the ~~Geosynthetic~~ Liner Evaluation Report (GLER).

Materials selected for use in the leachate collection system and drainage layers shall be verified by the POR to comply with this section of the LQCP.

#### 4.1.1 Double-sided Geocomposite Drainage Layer

Geosynthetic drainage material shall conform to the material and performance properties specified in Table III3F-4, Geosynthetic Drainage Layer Specifications. Manufacturers' certificates of material and performance characteristics shall be obtained and documented at the minimum frequency shown on Table III3F-4, Geosynthetic Drainage Layer Specifications, with not less than one per resin lot. Geosynthetic drainage material conformance testing will consist of transmissivity testing on each material type using the test set-up described in Table III3F-4, Geosynthetic Drainage Layer Specifications.

The drainage layer for the leachate collection system will consist of a geosynthetic drainage layer over both the floor and sideslopes of the landfill cells. The geosynthetic drainage layer shall consist of a geonet with a nonwoven geotextile heat-bonded to both sides. The geosynthetic drainage layer shall be anchored in an anchor trench at the crest of the sideslopes.

Geotextile panels placed in the leachate collection system shall be overlapped and either heat-bonded or field sewn. Only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geotextile. Personnel working on the geotextile shall not smoke, wear damaging shoes, or engage in any activity that damages the geotextile, or underlying geosynthetics.

**TABLE III3F-4: Geosynthetic Drainage Layer Specifications<sup>(4)</sup>**

<u>Test Category</u>	<u>Product</u>	<u>Test<sup>a</sup></u>	<u>Test Method<sup>b</sup></u>	<u>Testing Frequency</u>
<u>Manufacturer</u>	<u>Resin (Geonet)</u>	<u>Density</u>	<u>ASTM D792 or D1505</u>	<u>One test per 100,000 ft<sup>2</sup> and every resin lot</u>
		<u>Melt Flow Index</u>	<u>ASTM D1238</u>	
<u>Manufacturer</u>	<u>Geonet</u>	<u>Density</u>	<u>ASTM D792 or D1505</u>	<u>One test per 100,000 ft<sup>2</sup> and every resin lot</u>
		<u>Nass / Area</u>	<u>ASTM D5261</u>	
		<u>Thickness</u>	<u>ASTM D5199</u>	
		<u>Compression</u>	<u>ASTM D1621</u>	
		<u>Transmissivity</u>	<u>ASTM D4716</u>	
<u>Manufacturer</u>	<u>Geotextile</u>	<u>Mass/Area</u>	<u>ASTM D5261</u>	<u>One test per 100,000 ft<sup>2</sup> and every resin lot</u>
		<u>Grab Tensile Strength</u>	<u>A ASTM D4632</u>	
		<u>Trapezoidal Tear Strength</u>	<u>ASTM D4533</u>	
		<u>Burst Strength</u>	<u>ASTM D3786</u>	
		<u>Puncture Strength</u>	<u>ASTN D4833</u>	
		<u>Thickness</u>	<u>ASTM D5199</u>	
		<u>Apparent Opening Size</u>	<u>ASTM D4751</u>	
		<u>Permittivity</u>	<u>ASTM D4491</u>	
<u>Independent Laboratory</u>	<u>Geocomposite Product</u>	<u>Transmissivity</u>	<u>ASTM D4716</u>	<u>One test per product type</u>

		Interface Shear or Ply Adhesion	ASTM D5321 OR D413	One test per project	
<b>GEOCOMPOSITE</b>					
Property	Qualifier	Unit	Value	Test Method	Frequency
Transmissivity	Min.	m <sup>2</sup> /sec	See note 1	ASTM D4716 <sup>(2)</sup>	200,000-sf
Ply Adhesion	Min.	lb/in	0.5	ASTM-D7005	200,000-sf
<b>GEONET CORE</b>					
Property	Qualifier	Unit	Value	Test Method	Frequency
Thickness	Min.	mils	See note 1	ASTM-D5199	200,000-sf
Density (black resin)	Min.	g/cm <sup>3</sup>	0.940	ASTM-D1505	200,000-sf
Carbon Black Content	Range	%	2 to 3	ASTM-D4218	200,000-sf
<b>GEOTEXTILE</b>					
Property	Qualifier	Unit	Value	Test Method	Frequency
Mass per Unit Area	MARV	oz/yd <sup>2</sup>	6	ASTM-D5264	200,000-sf
AOS		US Sieve (mm)	70 (0.210)	ASTM-D4754	540,000-sf
Notes:					
(1) See Appendix III3D-3D-1 for design calculations for the geocomposite. These calculations shall be referenced to determine the suitability of the alternate materials.					
(2) The transmissivity shall be measured at a minimum gradient of 0.1 under a minimum normal pressure of 10,000 psf with a minimum seating period of 100 hour.					

<sup>a</sup> Adapted from EPA/600/R-93/182, September 1993, and *Designing with Geosynthetics*, 6<sup>th</sup> ed.

<sup>b</sup> The POR may propose equivalent or better tests.

#### 4.1.2 Filter Geotextile

The leachate drainage aggregate that is placed in the collection trenches and sumps shall be wrapped in a geotextile filter fabric. The geotextile shall have the minimum properties listed in Table III3F-5, [Nonwoven Filter Geotextile Specifications](#).

**Table III3F-5: Nonwoven Filter Geotextile Specifications**

Property	Qualifier	Unit	Value	Test Method	Frequency
Mass per Unit Area	MARV	oz/yd <sup>2</sup>	7.5	ASTM D5261	100,000 sf
AOS		US Sieve (mm)	80 (0.15)	ASTM D4751	550,000 sf
Puncture Resistance		lb	550	ASTM D6241	550,000 sf
Grab Tensile Strength		lb	205	ASTM D4632	100,000 sf

#### 4.1.3 Leachate Pipe

The leachate piping includes perforated collection trench pipes and solid sideslope riser pipes. The leachate piping shall conform to ASTM D3350 with a minimum cell classification value of 345464C. The pipe shall have the minimum SDR rating and perforation schedule shown on the plans and specifications.

#### 4.1.4 Drainage Material

Granular drainage materials, to be used in the underdrains, along the leachate collection lines, and in the sumps. At least one set of pre-construction tests shall be conducted for each drainage medium from each proposed source and a minimum of one per each 3000 cy. Pre-construction tests shall include a complete grain-size analysis, including minus No. 200 Sieve (ASTM D422) and calcium carbonate content (ASTM D3042 modified to use hydrochloric acid with a pH of 5 or the J&L method). The grain-size analysis will be used to determine if the material is compatible with the perforations in the leachate collection pipes and if the material is expected to achieve a minimum permeability of  $1 \times 10^{-2}$  cm/sec. The measured calcium carbonate content must not exceed 15 percent.

Granular drainage materials selected for use shall be tested at regular intervals for conformance during construction. Minimum testing frequency shall include one grain-size analysis for every 3,000 cubic yards, or portion thereof, for each material being used.

#### 4.2 Protective Cover Material

Protective cover materials shall be free of deleterious materials that could puncture the synthetic lining system. The protective cover material shall be selected and placed so as not to harm the geomembrane or other geosynthetic layers. The installation of the leachate collection system and protective cover system will have continuous inspection by the POR or his/her qualified representative(s).

Visual observations shall be made to verify that no deleterious materials are present in the protective cover that could damage the lining and leachate collection systems or impede their performance as designed.

Alternate protective cover material, such as shredded tire chips, may only be used when overlying a protective layer of sufficient puncture resistance to prevent penetration of steel belting fragments or other deleterious materials through the geosynthetic drainage layers or geomembrane. Prior to use of an alternate protective cover material, written approval will be obtained from the TCEQ.

Protective cover does not require compaction control; however, it should be stable for construction and disposal traffic. Care shall be exercised in placement so as not to shift, wrinkle, or damage the underlying geosynthetic layers, and the placement methods shall be documented. Protective cover placement should be conducted at the coolest part of the day to minimize the development of wrinkles in the geosynthetic materials.

The protective cover shall be placed such that the top surface, while spreading, is at least 2 feet above the geosynthetic layers at all times unless low ground pressure dozers are used (i.e., track pressure less than 5 psi). A greater thickness shall be maintained to support loaded hauling trucks and trailers and for turning

## 5.4 Alternative Liner Stability During Construction

30 TAC §330.337(f)(1)

The dewatering system will prevent excessive pressure head from developing beneath the alternative liner during construction because the double-sided geocomposite and toe drains have been designed to accommodate the maximum anticipated inflow of groundwater as presented in Appendix III3E-2, Dewatering System Calculations. During construction activities, the POR shall evaluate the groundwater level and confirm the underdrain design.

The POR shall observe the liner subgrade, liner, and leachate collection system materials for the presence of groundwater seepage during construction to verify the subgrade is suitable for liner system construction. The entire subgrade shall be observed during excavation, and the occurrence of the following shall be noted:

- Groundwater seepage within the subgrade.
- Softening of the subgrade surface resulting from groundwater seepage.
- Softness or sheen in the secondary features resulting from groundwater seepage.

In each GLER, observations and subgrade evaluations performed by the POR will be presented to verify that the subgrade soils are suitable for liner system construction.

## 5.5 Alternative Liner Stability During Filling and Operation

30 TAC §330.337(c)

After the waste management unit is constructed and approved to receive waste, landfill operators shall ensure the stability of the alternative liner by maintaining continuous operation of the dewatering system. The underdrain will be in operation until sufficient ballast is in place to offset hydrostatic uplift.

## 6.0 BALLAST REQUIREMENTS

To offset hydrostatic uplift, the weight of the alternative liner and the waste placed above it will provide the ballast (weight) to protect the liner system from uplift forces from groundwater. The ballast counteracting the hydrostatic forces include the soil materials from the leachate collection system components, the protective cover, waste above the liner and leachate collection system, and the soil materials from the final cover. The weight of the geosynthetic components of the leachate collection system and any geosynthetic components of the final cover is considered negligible.

## 6.1 Seasonal High Groundwater Table

30 TAC §330.337(i)

To evaluate the ballast required to offset hydrostatic uplift, groundwater levels within the waste management unit must be assessed. Groundwater level data are presented in Appendix III3F-2. Using groundwater level data provided in III4E, Historic Groundwater Levels. Figures III3F-3A and III3F-3B present the seasonal high groundwater contours elevations.

For each new increment of liner construction, the POR shall reevaluate the seasonal high groundwater table for the construction area as part of the Geosynthetic Liner Evaluation Report (GLER) submittal. The seasonal high water table shall be adjusted upward, if necessary, as additional groundwater elevation data become available.

## 6.2 Ballast Thickness Calculations

The required ballast thickness will be calculated using the following procedures:

1. Determine the hydrostatic uplift pressure,  $P$ , acting on the alternative liner from the assumed seasonal high groundwater table, and the resistance provided by the ballast:

Determine the maximum hydrostatic uplift pressure,  $P$ , acting on the geomembrane component of the alternative liner using the unit weight of water,  $\gamma_w$ , times the vertical distance from the base of the alternative liner to the seasonal high water table,  $H_{wt}$ .

$$P = \gamma_w H_{wt}$$

The resisting pressure,  $R_N$ , provided by the ballast is equal to the normal component of the sum of the unit weights of each ballast component,  $\gamma_i$ , times their respective vertical thickness,  $T_i$ , as shown in the following equation:

$$R_N = \sum(\gamma_i T_i) \cos^2 \beta$$

Where  $\beta$  is the angle between the slope of alternative liner and horizontal.

2. The equations for  $R$  and  $P$  are solved for equilibrium to find the thickness of ballast required to counteract the calculated water pressure.

The safety factors indicated in the regulations, either 1.2 or 1.5 depending on the type and configuration of ballast used, are incorporated into the above referenced equations by multiplying by the appropriate factor. If only soil ballast is used, a factor of 1.2 is used in the equation, and if some combination of soil layers and waste is used as ballast, a factor of 1.5 is used.

$$1.2P = R \quad \text{or} \quad 1.5P = R$$

When the equations for  $R$  and  $P$  are input, the required waste thickness, and/or required ballast thickness, is then determined. The equations can be solved for any location within or near an excavation where the piezometric profile is known or can be estimated.

The example ballast calculation are presented in Appendix III3E-1, [Sufficient Ballast Calculations](#).

In each GLER, waste for ballast calculations will be provided to determine the minimum amount of waste needed, if any, to offset the hydrostatic uplift from the seasonal high water table.

### 6.3 Ballast Verification

30 TAC §330.337(f)(2)

When the operator determines that adequate ballast is in place, the amount of ballast must be verified to be sufficient to offset hydrostatic uplift on the alternative liner by a factor of 1.5 per Appendix III3E-1, Example Sufficient Ballast Calculations. The measures and tests used to verify that any ballast including waste are sufficient to meet the established ballast criteria include surveyed elevations to determine component thickness and density to determine component weight. In addition, the seasonal high water table shall be adjusted upward, if necessary, as additional groundwater elevation data become available.

## 7.0 MARKING AND IDENTIFYING EVALUATED AREAS

In accordance with 30 TAC §330.143(b)(1) and (6), markers shall be placed so that all areas for which the GLER have been submitted and approved by the TCEQ are readily identifiable. Such markers are to provide site workers with immediate knowledge of the extent of approved disposal areas and shall be placed in accordance with the Site Operating Plan.

Markers shall be metal, wooden, or recycled posts and shall extend at least 6 feet above ground level. Markers shall not be obscured by vegetation and shall be placed so that they are not destroyed during operations. Sufficient intermediate markers shall be installed to show the required boundary. Lost markers shall be promptly replaced. Limits of the evaluated area shall be referenced to the site grid system. Markers shall not be placed inside the evaluated area. Markers shall be color coded in accordance with 30 TAC §330.143(b)(1). GLER markers shall be red in color.

## 8.0 DOCUMENTATION AND REPORTING

**8.0** The use of applicable TCEQ forms is required. Forms for liners and leachate collection systems and forms for excavation dewatering and liner ballast is posted on the TCEQ website.

### 8.1 Geosynthetic Liner Evaluation Report

30 TAC §330.341

A Geosynthetic Liner Evaluation Report (GLER) includes documentation of cell construction including geosynthetic clay liner installation, geomembrane installation, and leachate collection system installation including protective cover soil. Prior to the disposal of solid waste in any cell, or on any area, excavation, or unprotected surface, a GLER shall be submitted to the TCEQ.

Each GLER shall be submitted in triplicate (including all attachments) to the executive director and shall be prepared in accordance with the methods and procedures contained in this LQCP. If the executive director provides no response, either written or verbal, within 14 days of receipt, the owner or operator may continue facility construction or operation.

If the executive director determines that a report is incomplete or that the test data provided are insufficient to support the evaluation conclusions, additional test data or other information may be required, and use of the cell or disposal area will not be allowed until such additional data are received, reviewed, and accepted. Each report must be signed and, where applicable, sealed by the POR performing the evaluation and counter-signed by the facility operator or an authorized representative.

The construction documentation provided in the GLER will contain a narrative describing the work conducted and testing programs required by the LQCP, "as-built" or record drawings, and appendices of field and laboratory data. The GLER will contain or discuss the information included in Table III3F-76, [GLER Content](#) at a minimum.

**Table III3F-76: GLER Content**

<b>Geosynthetic Clay Liner</b>	Roll shipment and receipt information
	Manufacturer's quality control certificates and results
	Storage and handling information
	Conformance test sampling and test results
	Subgrade acceptance
	Anchor trench preparation and backfilling
	Panel deployment, identification, and placement
	Equipment placed or operated on GCL
	100 percent visual inspection for defects, damage, etc.
	Seaming methods
	Repairs, including patch size and shape
<b>Geomembrane Liner</b>	Roll shipment and receipt information
	Manufacturer's quality control certificates and results
	Storage and handling information
	Conformance test sampling and test results
	Seamer's names and resumes of experience and qualifications
	Subgrade acceptance
	Anchor trench preparation and backfilling
	Panel deployment, identification, and placement
	Seam preparation, orientation, and identification
	Equipment placed or operated on geomembrane
	100 percent visual inspection for defects, damage, etc.
	Trial seam tests for each combination of seaming equipment and personnel



PERMIT AMENDMENT APPLICATION

Part III, Attachment 4

# GEOLOGY REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



## 1.0 REGIONAL GEOLOGY

The Gulf of Mexico (GOM) is a semi-enclosed ocean basin surrounded by continental shelves and coastal plains. The GOM's depositional system is a three-dimensional body of sediment deposited in a contiguous suite of process-related sedimentary environments and each sedimentary environment produces specific facies / rock types. The stratigraphy along the GOM is composed of fluvial depositional systems created by regionally cyclic episodes of focused deposition and progradation of the shoreline followed by non-deposition and transgression of the coastal plain. The timing and cyclicity of progradational and transgressive events depends upon the interplay of sediment supply, subsidence, and sea-level change caused by both tectonic development and continental glaciation (Young, 2010).

In the Lower Rio Grande Valley (LRGV) the depositional stratigraphy described as the Gulf Coast Aquifer (GCA) are Quaternary and Neogene period sediments consisting primarily of fine to medium-grained materials deposited by fluvial and eolian processes. The outcrop of each progressively older, underlying unit is found to the west of the younger, overlying unit. Because of differential subsidence, units typically thicken and dip toward the coastline of the GOM.

### 1.1 Geologic Map

30 TAC §330.63(e)(1)(A)

Figure III4-1, Geologic Map presents the McAllen-Brownsville Sheet, Geologic Atlas of Texas prepared by the Bureau of Economic Geology. This map presents geologic units and structural features within the vicinity of the facility with text describing the stratigraphy and lithology of the map units. The facility is located on Neogene sediment overlain by Quaternary (Holocene) windblown (eolian) sediment.

### 1.2 Generalized Stratigraphic Column

30 TAC §330.63(e)(1)(B)

The generalized stratigraphic column of the area beneath the facility is presented to a depth of approximately 1,600 ft-bgs, which is the base of the Evangeline Aquifer. Based on Figure III4-1, Geologic Map and Figure III4-2, Regional Stratigraphic Cross-Section, the Goliad Formation outcrops in the vicinity and is overlain by a veneer of Holocene eolian deposits. A description of the stratigraphy, including geologic age, lithology including variations, thickness, depth, geometry, hydraulic conductivity, and depositional setting of each geologic unit, as available through current geologic information, is included in Table III4-1. [Stratigraphic Units Underlying Facility.](#)

Deposits include successions of clay, marl, and caliche. Base elevations and thicknesses for the upper and lower Goliad Formation are presented on Figures III4-3 and III4-4 respectively.

The Upper Goliad's depositional facies is fluvial / meander belt. Fluvial channel-fill facies are composed mainly of medium- to coarse-grained sand and gravel, displaying large-scale cross-bedding. Inter-channel facies include sandy crevasse splays, and muddy floodplain and playa lake facies formed where flood waters breached channel levees and deposited broad aprons of sandy sediment on the floodplain. These facies surround channel-fill and crevasse-splay facies and were deposited across inter-channel areas during floods. Mottled red clays dominate floodplain successions, and secondary calichification and pedogenesis are pervasive. The Lower Goliad's depositional facies is lower coastal plain fluvial / coastal which includes small deltaic and barrier-lagoon depositional systems. Channel belt composition is sandy sediment whereas interchannel composition is calcareous mudstone (Young, 2010).

### 1.2.2.2 Lagarto Formation

The Lagarto Formation underlies the Goliad Formation and is divided into upper, middle, and lower units. Base elevations and thicknesses for the upper and middle Lagarto Formation are presented on Figures III4-5 and III4-6 respectively. The depositional facies underlying the facility is lower coastal plain fluvial / coastal which includes small deltaic and barrier-lagoon depositional systems. The Lagarto Formation represents a fluvial-deltaic depositional episode in which the upper Lagarto forms the upper progradational part, and the middle and lower Lagarto forms the lower retrogradational part. Therefore, the upper part is generally sand-rich, whereas the middle and lower parts are relatively more mud-rich. The mud-rich parts of the Lagarto are referred to as the Burkeville Aquitard which underlies the Evangeline Aquifer.

## **2.0 ACTIVE GEOLOGIC PROCESSES**

30 TAC §330.63(e)(2)

A description of active geologic processes in the vicinity of the facility including identification of any faults and subsidence in the area of the facility is discussed in the following sections.

### **2.1 Erosion**

Erosion potential caused by surface water processes such as overland flow, channeling, gullying, and wind has been evaluated.

#### **2.1.1 Soils**

Figure III4-7, Soils Map presents the distribution of six soil series, predominantly loamy, located across the facility according to the Soil Survey of Hidalgo County, Texas (Jacobs, 1981). These soil series include: the Brennan, Hebbronville (#22, #23, and #24), Hidalgo, Racombs, and Willacy Series. Table III4-2, [Soil](#)

**Types** lists sixteen soil types within the facility boundary, percentage of area covered, and potential for water and wind erosion.

**Table III4-2: Soil Types**

Soil	Unit Name	Area Covered <sup>1</sup> (%)	Water Erosion Hazard	Wind Blowing Hazard
3	Brennan fine sandy loam, 0 to 1 percent slopes	7.8	Slight	Moderate
9	Delfina loamy fine sand, warm, 0 to 2 percent slopes	4.2	Moderate	Severe
16	Hargill fine sandy loam, 0 to 1 percent slopes	9.5	Slight	Moderate
17	Hargill fine sandy loam, 1 to 3 percent slopes	6.6	Moderate	Moderate
22	Hebbronville sandy loam, 0 to 1 percent slopes	7.7	Slight	Moderate
23	Hebbronville sandy loam, 1 to 3 percent slopes	11.7	Moderate	Moderate
24	Hebbronville sandy loam, 3 to 5 percent slopes	8.9	Severe	Moderate
25	Hidalgo fine sandy loam, 0 to 1 percent slopes	9.1	Slight	Moderate
48	Racombes sandy clay loam	5.1	Slight	Slight
60	Rio clay loam	1.2	Moderate	Slight
70	Willacy fine sandy loam, 0 to 1 percent slopes	19.1	Slight	Moderate
71	Willacy fine sandy loam, 1 to 3 percent slopes	4.0	Moderate	Moderate

Notes:

- The percentages do not add up to 100% due to part of the area being occupied by the landfill and ponds that are not accounted for in the data. The data is obtained from the NRCS Web Soil Survey Tool: <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

### 2.1.2 Surface Water Erosion

Surface water erosion will not adversely affect the operation of the facility. Gullying and channeling are uncommon in the area because of high infiltration rates and little relief. Soils in the area are well drained and have slopes of less than or equal to 5.2% (Jacobs et al., 1981). Sheet flow only occurs during very heavy rainfall as evident by lack of natural drainage features on or near the facility.

The soil types located in the facility are either slightly or moderately erodible by surface water with an exception of Hebbronville #24. This soil, located in the middle of the facility, exhibits severe water erosion potential and covers approximately nine percent of the facility. Most of this soil will be removed as development of the facility progresses.

An erosion and sedimentation control plan is included in Part III2, Surface Water Drainage Report of this application was developed to mitigate erosion potential along landfill embankments and sedimentation in surface water drainage features. Erosion and sediment controls will be implemented during the construction and operational periods of the facility.

### 2.1.3 Wind Erosion

Wind erosion will not adversely affect the operation of the facility. Prevailing winds can erode surface sediments in the area (Barnes, 1976). The soil types located in the facility are either slightly or moderately erodible by wind with an exception of Delfina #9. This soil, located in the south east corner of the facility, exhibits severe wind erosion potential and covers approximately four percent of the facility. This soil will be removed as development of the facility progresses for construction of a future perimeter berm, access road, and storm water pond.

## 2.2 Active Geological Faulting Assessment

30 TAC §330.555(b)

A location restriction criterion requires that new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet of a fault that has had displacement in Holocene time (representing the most recent 10,000 years), referred to herein as an active fault. Sites located within areas that may be subject to differential subsidence or active geological faulting must include detailed fault studies. When an active fault is known to exist within 1/2 mile of the site, the site must be investigated for unknown faults. There is no evidence of active geological faulting or differential subsidence that would impair the integrity of any landfill component.

Salt domes cause much of the recent fault activity in the Gulf Coastal Plains. In Hidalgo County, salt domes are rare because the Jurassic salt layer, found throughout the Gulf Coast, is thin (Worral & Snelson, 1989). This occurrence has reduced recent fault activity to a minimum in Hidalgo County. The Geologic Atlas of Texas (McAllen-Brownsville Sheet) presented in Figure III4-1, Geology Map and Texas Water Development Board (TWDB) Reports (Young et al. 2010 and Mace et al. 2006) showing faults, were reviewed to determine the presence of faults within the vicinity. Based on the review of the maps and published literature, there are no faults or surface expression of Holocene faults indicated within a one-half-mile radius of the facility. As depicted on Figure III4-1, Geologic Map there are no mapped surface expressions of active or inactive faults located within at least a five-mile-radius of the facility.

## 2.3 Seismic Impact Zone Assessment

30 TAC §330.557

A location restriction criterion requires new municipal solid waste landfill units and lateral expansions shall not be located in seismic impact zones. A seismic impact zone is defined as an area with a 10-percent or greater probability that the maximum horizontal acceleration in lithified earth material, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 250 years.

the Jasper (Chowdhury and Mace 2007). Figure III4-9, Extent of Gulf Coast Aquifers in Lower Rio Grande Valley shows the outcrop areas of the different aquifers in the region.

Underlying the facility is the Evangeline Aquifer which overlies the Burkeville Confining Unit; their association with geologic units is presented in Table III4-3, Hydrogeologic Units Underlying the Facility.

**Table III4-3: Hydrogeologic Units Underlying the Facility**

System	Series	Stratigraphic Units	Lithology	Approx. Thickness (ft)	Approx. Depth (ft-bgs)	Hydro-stratigraphy	Water Bearing Properties
Quaternary	Holocene	Stabilized Sand Dune Deposits	Sand; Silt	0-30	10	Evangeline Aquifer	Moderate to very high permeability, low to moderate water-holding capacity.
Neogene	Miocene	Upper Goliad	Clay or Mud; Sandstone; Mudstone, Carbonate, Limestone, Conglomerate	400	400		Moderate permeability, moderate water-holding capacity.  Provides water for domestic and irrigation uses.
		Lower Goliad		550	950		
		Upper Lagarto	Sandstone	650	1600		
		Middle Lagarto	Clay or Mud	700	2300	Burkeville Confining Unit	Regional aquitard, low permeability.

(Table compiled after Baker, 1979; Chowdhury and Mace, 2007; and Young et al., 2010)

### 3.1 Composition

30 TAC §330.63(e)(3)(B)

The Evangeline Aquifer is composed primarily of the Goliad Sand, but may also contain sections of sand and clay from the Upper Lagarto Formation. It is approximately 1,600 feet thick under the facility and dips towards the coast approaching thicknesses greater than 2,300 ft. Sand fractions in the Evangeline are observed to range from less than 0.4 to greater than 0.6 (Young et al., 2010).

### 3.2 Hydraulic Properties

30 TAC §330.63(e)(3)(C)

Transmissivity values are observed to range from 3,000 to 15,000 ft<sup>2</sup>/day (Chowdhury and Mace, 2007). Average horizontal and vertical hydraulic conductivities are 80 feet/day and 1 x 10<sup>-3</sup> feet/day, for horizontal

and vertical, respectively (Ryder, 1988). The storativity of the Evangeline Aquifer ranges from 0.001 to 0.01 in the unconfined areas and 0.0004 to 0.001 in the confined areas (Chowdhury and Mace, 2007).

### 3.3 Under Water Table or Artesian Conditions

30 TAC §330.63(e)(3)(D)

The Evangeline Aquifer generally ~~exhibits~~exists under water table conditions, however successions of clay may cause portions to behave as a semi-confined aquifer.

### 3.4 Hydraulic Connectivity

30 TAC §330.63(e)(3)(E)

The Evangeline Aquifer is hydraulically bounded by the underlying Burkeville Confining Unit, located at a depth of approximately 1600 ft, which separates it from the underlying Jasper Aquifer. Within the Goliad's sand-dominated fluvial systems, sand bodies are highly interconnected (Young, 2010).

### 3.5 Regional Water-Table Potentiometric Surface Maps

30 TAC §330.63(e)(3)(F)

Figure III4-10, Evangeline Aquifer Potentiometric Surface and Hydraulic Conductivity presents a regional potentiometric surface map which demonstrates the regional groundwater flow direction to the east/southeast.

### 3.6 Rate of Groundwater Flow

30 TAC §330.63(e)(3)(G)

The aquifers of the GCA dip towards the coast and groundwater flow is towards the Gulf of Mexico. The estimated average rate of horizontal groundwater flow for the Evangeline Aquifer is 80 ft/day (Ryder, 1988).

### 3.7 Total Dissolved Solids

30 TAC §330.63(e)(3)(H)

Typical range of values for total dissolved solids content of groundwater, mineral constituents dissolved from rocks and soils within the Evangeline Aquifer is 632 – 8,774 mg/L with a 0.0 to 0.2 fraction of aquifer thickness that is fresh water (Young, 2010). A general classification of water based on dissolved solids content is as follows; waters containing less than 1,000 mg/L of dissolved solids are considered fresh; 1,000 to 3,000 mg/L, slightly saline; 3,000 to 10,000 mg/L, moderately saline; 10,000 to 35,000 mg/L, very saline, and more than 35,000 mg/L, brine (Winslow and Kister, 1956, p.5)

### 3.8 Areas of Recharge

30 TAC §330.63(e)(3)(I)

The source of the water which recharges the associated hydrostratigraphic units of the GCA is from precipitation directly onto outcrops, discharging surface water in the Rio Grande and Arroyo Colorado Rivers, and irrigation return flow. According to Figure III4-9, ~~Extent of~~ Gulf Coast Aquifers in Lower Rio Grande Valley, the facility is located in a recharge area for the Chicot Aquifer. Figure III4-1, Geologic Map demonstrates Holocene-age eolian deposits overlying the Goliad Formation of the Evangeline Aquifer and the Lissie Formation of the Chicot Aquifer within a five-mile radius of the facility. Therefore, areas within a five-mile radius recharge both the Chicot and Evangeline Aquifers.

### 3.9 Local Groundwater Use

30 TAC §330.63(e)(3)(J)

The Rio Grande River is the primary source of domestic water in the Lower Rio Grande Valley. When groundwater is used, it generally comes from the thin layer of the Chicot aquifer, if present, or upper portions of the Evangeline aquifer. Groundwater wells within a one-mile-radius of the facility were located based on a water well database search of located wells from the Texas Water Development Board (TWDB) and on information supplied by the Red Sands Groundwater Conservation District (RSGCD). Figure III4-11, Water Well Location Map depicts approximate water well locations.

The TWDB database search identified six located water wells within a one-mile-radius of the facility summarized in Table III4-4A, Water Well Locations within One-Mile-Radius Provided by TWDB. From available screened depth information, total depths of these water wells range from 74 ft to 1250 ft and extend into the upper parts of the Evangeline Aquifer. In addition to the TWDB database search, RSGCD provided approximate locations for six additional water wells within a one-mile-radius of the facility summarized in Table III4-4B, Water Well Locations within One-Mile-Radius Provided by RSGCD. The locations of these additional wells or records could not be verified.

**Table III4-4A: Water Well Locations within One-Mile-Radius Provided by TWDB**

State Well Number	Map ID <sup>1</sup>	Latitude	Longitude	Surface Elev. (ft)	Total Depth (ft)	Screen Interval (ft)	Approx. Distance from site <sup>2</sup> (ft)	Water Use <sup>3</sup>
8739901	WW-1	26°24'06"N	98°08'16"W	86	258	NA	1,440	Domestic (P) Stock (S)
8739902	WW-2	26°23'41"N	98°08'29"W	84	240	160-240	2,230	Domestic (P) Stock (S)
8739903	WW-3	26°23'36"N	98°08'31"W	83	1125	NA	2,340	Irrigation

State Well Number	Map ID <sup>1</sup>	Latitude	Longitude	Surface Elev. (ft)	Total Depth (ft)	Screen Interval (ft)	Approx. Distance from site <sup>2</sup> (ft)	Water Use <sup>3</sup>
8740701	WW-4	26°24'48"N	98°06'25"W	87	223	124-155	4,740	Stock
8740702	WW-5	26°24'17"N	98°06'29"W	89	74	185-216	2,200	Stock
8740703	WW-6	26°24'59"N	98°06'59"W	101	1250	NA	5,150	Irrigation

1. Map ID as shown on Figure III4-7, Water Wells
2. Distances are estimated to nearest facility property boundary
3. (P) – primary water use; (S) – secondary water use (obtained from well logs)
- 3.4. NA – Information not available

**Table III4-4B: Water Well Locations within One-Mile-Radius Provided by RSGCD**

Well Reference/Owner Name	Map ID <sup>1</sup>	Latitude <sup>2</sup>	Longitude <sup>2</sup>	Approx. Distance from site <sup>3</sup> (ft)
E.B. Guerra Elementary School	WW-7	26°24'07"N	98°08'57"W	5,110
Garza Well	WW-8	26°24'04"N	98°08'50"W	4,480
Chandler Well	WW-9	26°24'07"N	98°08'26"W	2,390
Labus Water Well	WW-10	26°24'01"N	98°08'27"W	2,350
Gin Well	WW-11	26°24'29"N	98°08'14"W	3,200
Neal Well	WW-12	26°24'45"N	98°08'10"W	4,530

1. Map ID as shown on Figure III4-7, Water Wells
2. Well locations are approximately estimated based on hand-marked map provided by RSGCD, dated March 18, 2016
3. Distances are estimated to nearest facility property boundary.
- 3.4. Screened interval information of water wells from RSGCD are not available.

The facility's engineered design and operational groundwater monitoring mitigate potential impacts on groundwater use within the vicinity. The facility's waste disposal units are constructed with a low-permeability geosynthetic lining system to prevent potential contaminant transport into the groundwater. In an unlikely event contaminants are released, the facility's groundwater monitoring system will detect the release and corrective measures will be implemented. In addition, the closest water well has over 1,400 ft of separation from the facility property boundary; therefore, any contaminants will be attenuated or remediated prior to potential impacts on groundwater use.

#### 4.0 SUBSURFACE INVESTIGATION

30 TAC §330.63(e)(4)

The subsurface investigation at the facility includes a description of all borings drilled on site to test soils and characterize groundwater. Geologic strata have been characterized to depths of up to 100 feet below ground surface from the current and previous subsurface investigations.

## 4.1 Soil Boring Plan

30 TAC §330.63(e)(4)

Presented in Appendix III4A, Soil Boring Plan (SBP) including locations and depths of all proposed borings for the expansion area was submitted to the TCEQ and approved prior to initiation of the subsurface investigation.

### 4.1.1 Number of Borings

30 TAC §330.63(e)(4)(A)

The SBP proposed 35 borings, a sufficient number of borings to establish subsurface stratigraphy and to determine geotechnical properties of the soils beneath the facility. The number of borings were determined based on general characteristics of the facility and on the heterogeneity of subsurface materials analyzed from previously performed subsurface investigations.

### 4.1.2 Depth of Borings

30 TAC §330.63(e)(4)(B)

The approved SBP proposed borings that are sufficiently deep enough to allow identification of the uppermost aquifer and underlying hydraulically interconnected aquifers. They penetrate the uppermost aquifer and are deep enough to identify the aquiclude at the lower boundary. All the borings are at least five feet deeper than the elevation of the deepest excavation, 70 ft-msl, and 18 of the 35 borings are at least thirty feet below the deepest excavation.

### 4.1.3 Established Field Exploration Methods

30 TAC §330.63(e)(4)(C)

All borings were conducted in accordance with established field exploration methods detailed in the approved SBP. The subsurface investigation, borings, and plugging and abandonment were conducted in accordance with applicable rules in 16 TAC §76 – Water Well Drillers and Water Well Pump Installers including the preparation and submittal of well installation and plugging reports. The drilling and sampling program of the SBP includes drilling methods, sampling plan, and boring log documentation.

## 4.2 Soil Boring Logs

30 TAC §330.63(e)(4)

Appendix III4B, Soil Boring Logs include a boring logs from the current and previous subsurface investigations. Boring logs from the current investigation outlined in the SBP include detailed description of materials encountered including any discontinuities such as fractures, fissures, slickensides, lenses, or

- 2003 – CCI EnviroDrilling, Inc. plugged and re-installed monitoring wells MW-1 through MW-4. The wells were renamed MW-1R through MW-4R. Golder provided oversight.
- 2004 – EnviroCore, Inc. replaced the damaged MW-3R to installed MW-3RA. Golder provided oversight.
- 2005 – EnviroCore, Inc. installed MW-15 through MW-18 under Golder’s oversight.
- 2009 – Lewis Environmental drilled three new wells – MW-22, MW-23, and MW-24. Several old wells were redrilled/replaced including MW-3A, MW-4A, MW-7R through MW-10R, MW-15R, MW-16R, and MW-18R. Golder provided oversight.
- 2013 – EnviroCore drilled two monitoring wells MWD-6 and MWD-7. Golder provided oversight.

**Table III4-5A: Coordinates and Elevations of Previously Advanced Borings (ft)**

Boring	Northing <sup>2</sup> (ft)	Easting <sup>2</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
Langley-Pitman Testing Lab, 1976 (Soil Borings)					
No.1	16,668,336.87	1,105,717.33	91	40	51
No.2	16,669,135.55	1,105,455.21	86	40	46
No.3	16,669,867.66	1,105,398.98	87	40	47
No.4	16,670,296.17	1,104,238.29	86	40	46
No.5	16,668,738.00	1,104,072.69	91	40	51
No.6	16,668,807.16	1,105,020.81	91	40	51
Professional Services Industries, 1993 (Soil Borings and Monitoring Wells)					
B-1	16,670,435.62	1,104,102.38	85	50	35
B-2	16,668,479.69	1,103,794.80	85	50	35
B-3	16,668,153.82	1,105,849.69	91	50	41
B-4	16,670,034.21	1,106,143.67	88	50	38
B-5	16,669,351.49	1,105,106.22	90	100	-10
MW-1	16,670,435.62	1,104,102.38	85	27	58
MW-2	16,668,479.69	1,103,794.80	86	27	59
MW-3	16,668,153.82	1,105,849.69	90	30	60
MW-4	16,670,034.21	1,106,143.67	88	27	61
Rust Environment & Infrastructure, March 1996 (Soil Borings)					
SB-01	16,669,568.08	1,106,617.13	87	40	47
SB-02	16,668,575.32	1,106,460.78	83	40	43
SB-03	16,668,404.19	1,107,547.38	87	40	47
SB-04	16,669,396.95	1,107,703.73	91	40	51
SB-05	16,669,045.31	1,107,108.28	88	100	-12
Raba-Kistner-Brytest Consultants, December 1996 (Monitoring Wells)					

<b>Boring</b>	<b>Northing<sup>2</sup> (ft)</b>	<b>Easting<sup>2</sup> (ft)</b>	<b>Ground Elevation (ft-msl)</b>	<b>Depth (ft-bgs)</b>	<b>Bottom Elevation (ft-msl)</b>
MW-5	16,668,819.18	1,105,953.07	87	35	52
MW-6	16,669,467.10	1,106,057.05	84	35	49
MW-7	16,670,228.55	1,105,449.97	84	35	49
MW-8	16,670,327.25	1,104,791.54	84	35	49
<b>Golder Associates/ PSI, 1999 (Soil Borings and Piezometers)</b>					
G-1	16,670,047.99	1,106,483.70	87	50	37
G-2	16,669,792.20	1,107,218.82	88	50	38
G-3	16,669,634.68	1,108,135.47	96	58	38
G-4	16,669,719.89	1,108,864.82	100	62.5	38
G-5	16,669,445.90	1,107,174.40	88	25	63
G-6	16,669,189.68	1,108,692.02	106	68.5	38
G-7	16,669,169.33	1,106,288.59	83	45	38
G-8 (P-1)	16,668,919.88	1,107,855.10	87	50	37
G-9 (P-2)	16,668,473.27	1,107,013.57	83	45	38
G-10	16,668,500.43	1,108,575.37	98	60	38
G-11	16,668,298.65	1,108,146.76	86	48.5	38
G-12	16,668,075.59	1,106,168.70	88	50	38
G-13	16,668,028.30	1,107,311.54	84	46.5	38
G-14	16,667,706.94	1,108,555.69	87	50	37
<b>Southern Ecology Management/ PSI, 2000 (Monitoring Wells)</b>					
MW-9	16,669,138.78	1,103,896.60	88	37.7	50
MW-10	16,669,758.36	1,104,000.04	89	37.7	51
MW-11	16,670,047.99	1,106,483.70	88	37	51
MW-12	16,668,075.59	1,106,168.70	90	39.2	51
MW-14	16,669,719.89	1,108,864.82	100	55	46
<b>Golder Associates/ CCI EnviroDrilling, Inc., 2003 (Monitoring Wells)</b>					
MW-1R	16,670,499.43	1,104,230.98	85	29.5	55
MW-2R	16,668,462.15	1,103,807.64	87	31.5	55
MW-3R	N/A	N/A	NA	37	NA
MW-4R	16,670,139.26	1,106,060.54	89	37.5	51
<b>Golder Associates/ EnviroCore, Inc., 2004 (Monitoring Well)</b>					
MW-3RA	16,629,881.403	1,093,651.047	92	38	54
<b>Golder Associates/ EnviroCore, Inc., 2005 (Monitoring Wells)</b>					
MW-15	16,669,968.26	1,107,279.30	91	45	46

Boring	Northing <sup>2</sup> (ft)	Easting <sup>2</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
MW-18	16,667,905.72	1,107,198.44	88	36.5	52
Golder Associates/ Lewis Environmental, April 2009 (Monitoring Wells)					
MW-3A	16,668,160.24	1,105,577.78	96	42.5	53
MW-4A	16,670,154.21	1,105,936.63	88	38	49
MW-7R	16,670,243.18	1,105,343.73	86	37	49
MW-8R	16,670,342.18	1,104,749.81	85	37	48
MW-9R	16,669,020.21	1,103,870.99	87	38	50
MW-10R	16,669,614.74	1,103,959.80	88	39	49
MW-15R	16,670,029.73	1,107,082.63	88	37.5	51
MW-16	16,669,910.05	1,107,645.48	86	34	53
MW-18R	16,667,889.53	1,107,351.67	85	33	52
MW-22	16,668,246.95	1,104,990.12	93	39	54
MW-23	16,668,348.50	1,104,397.05	88	28	60
MW-24	16,670,205.18	1,104,058.59	87	37	51
Golder Associates (2013) (Monitoring Wells)					
MWD-6	16,667,942.38	1,106,762.85	91	45	46
MWD-7	16,667,796.19	1,107,944.36	85	31	54

Notes: 1. N/A – Information not available

2. Boring coordinates provided in Texas State Plane South Zone NAD83

#### 4.2.2 Current Subsurface Investigation

The current subsurface investigation was performed in accordance with the approved SBP. A total of 35 borings were advanced in expansion area where all the borings are at least five feet deeper than the elevation of the deepest excavation, 70 ft-msl, and 18 of the 35 borings are at least thirty feet below the deepest excavation. Twelve borings were completed as piezometers to provide groundwater elevation data. The boreholes are identified as 101 through 135 with a prefix of 'B-' for the boreholes and 'PZ-' for the piezometers.

**Table III4-5B: Coordinates and Elevations of Borings Advanced in the Expansion Area (ft)**

Boring	Northing <sup>1</sup> (ft)	Easting <sup>1</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
PZ-101	16,672,192.55	1,106,495.22	97.8	60	37.8
B-102	16,672,066.31	1,107,318.56	95.3	35	60.3
B-103	16,671,938.34	1,108,124.57	94.4	55	39.4
PZ-104	16,671,821.46	1,108,965.02	95.5	35	60.5

<b>Boring</b>	<b>Northing<sup>1</sup> (ft)</b>	<b>Easting<sup>1</sup> (ft)</b>	<b>Ground Elevation (ft-msl)</b>	<b>Depth (ft-bgs)</b>	<b>Bottom Elevation (ft-msl)</b>
B-105	16,671,681.02	1,109,781.78	88.7	50	38.7
PZ-106	16,671,555.69	1,110,594.81	84.8	30	54.8
B-107	16,671,516.22	1,106,392.87	87.9	25	62.9
B-108	16,671,377.05	1,107,210.46	98.3	60	38.3
B-109	16,671,251.10	1,108,033.90	87.9	25	62.9
B-110	16,671,136.94	1,108,850.76	92.1	55	37.1
B-111	16,671,002.92	1,109,671.86	89.1	30	59.1
B-112	16,670,874.68	1,110,498.71	86.8	50	36.8
PZ-113	16,670,843.25	1,106,277.71	85.8	50	35.8
B-114	16,670,703.98	1,107,109.34	91.6	30	61.6
B-115	16,670,592.78	1,107,899.67	99.3	62	37.3
PZ-116	16,670,444.83	1,108,755.73	93.2	30	63.2
B-117	16,670,335.07	1,109,568.12	91.8	55	36.8
PZ-118	16,670,193.76	1,110,392.83	89.4	35	54.4
B-119	16,669,643.34	1,109,465.29	84.3	25	59.3
B-120	16,669,515.09	1,110,285.15	92.8	55	37.8
B-121	16,669,413.56	1,111,072.66	94.5	32	62.5
PZ-122	16,669,091.56	1,111,975.25	92.2	55	37.2
B-123	16,668,982.12	1,109,304.96	83	45	38
PZ-124	16,668,836.59	1,110,178.48	97.6	40	57.6
B-125	16,668,708.21	1,111,001.47	94.9	60	34.9
B-126	16,668,443.85	1,111,760.57	93.3	30	63.3
B-127	16,668,290.12	1,109,248.44	94.3	45	49.3
B-128	16,668,168.26	1,110,069.45	98.2	60	38.2
B-129	16,668,024.21	1,110,893.17	100	35.3	64.7
PZ-130	16,667,916.49	1,111,609.19	100.5	65	35.5
PZ-131	16,667,606.90	1,109,142.73	96.3	60	36.3
B-132	16,667,493.43	1,109,964.91	94.9	35	59.9
PZ-133	16,667,399.31	1,110,759.32	98.2	60	38.2
PZ-134	16,670,873.39	1,104,174.27	82.4	45	37.4
B-135	16,670,700.05	1,105,208.90	83.1	22	61.1

Note: 1. Boring coordinates provided in Texas State Plane South Zone NAD83

#### 4.2.3 Boring Installation, Abandonment, and Plugging

30 TAC §330.63(e)(4)(D)

Twelve borings were completed as piezometers in accordance with applicable rules in 16 TAC §76 – Water Well Drillers and Water Well Pump Installers to provide groundwater elevation data. The remaining borings were plugged with a cement-bentonite grout.

#### 4.3 Interpretive Geologic Cross-Sections

30 TAC §330.63(e)(4)(G)

Interpretive geologic cross-sections are presented on Figures III4-12B through III4-12H and include a key map of the cross-section locations depicted on Figure III4-12A, Soil Boring [PlanMap](#). These cross-sections utilized boring information gathered from the current and previous subsurface investigations to show boring profiles relative to existing ground and interpretive soil stratum boundaries. The boring profiles include corresponding soil classifications, any static and initial water levels, and well screen locations for any piezometers and monitoring wells.

#### 4.4 Subsurface Stratigraphy

30 TAC §330.63(e)(4)(H)

The results of the subsurface investigation is consistent with previous studies at the facility. The facility is underlain by three distinct strata, identified below in order from ground surface down:

- Stratum I: sandy clays or clayey sands, with layers of silty clay, silty sand, or clayey silt.
- Stratum II: sands/silty sands, fine, poorly graded, and is the uppermost water-bearing unit (uppermost aquifer).
- Stratum III: predominantly clay, with some amounts of sandy clay or silty clay, high plasticity, hard, brown, and dry, and is the confining unit underlying the uppermost water-bearing unit (lower confining unit).

### 5.0 GEOTECHNICAL PROPERTIES

30 TAC §330.63(e)(5)

#### 5.1 Laboratory Testing

30 TAC §330.63(e)(5)(A)&(B)

Multiple samples were collected in accordance with the approved SBP including both Shelby tube and split-spoon samples. All soil samples were observed to determine the stratigraphy; a total of 81 soil samples

were used for laboratory testing. Laboratory testing was performed on the selected samples in accordance with commonly accepted methods and practices of American Society for Testing and Materials (ASTM).

Falling head permeability tests were performed according to ASTM D5084, Standard Test Methods for Measurement of Hydraulic Conductivity of Saturated Porous Materials Using a Flexible Wall Permeameter, on undisturbed soil samples using tap water as the permeant. Five undisturbed samples that represent the sidewall of cell excavation were tested for the coefficient of permeability on the sample's in-situ horizontal axis; all others were tested on the in-situ vertical axis. Calculations for the final coefficient of permeability test results for each sample tested indicate the type of test used and the orientation of each tested sample.

Sieve analysis were performed using ASTM D422 and D1140; Atterberg limits per ASTM D4318; moisture content per ASTM D2216; the unit weight per ASTM D7263; and specific gravity per ASTM D854. Shear strength testing consisted of unconsolidated-undrained (UU) triaxial compression tests per ASTM D2850 and consolidation testing was performed per ASTM D2435.

Appendix III4C, Soil Laboratory Testing Data includes the aforementioned testing for the selected samples. A summary of the soil samples and their corresponding tests is provided in Table III4-6, [Soil Sample Laboratory Testing Summary](#). Collectively, 61 samples from Stratum I, 10 samples from Stratum II, and 10 samples from Stratum III were tested. These strata collectively represent the bottom and side of the proposed excavation, as well as the 30 feet below the lowest elevation of excavation. Laboratory testing data from previous investigations are included in Appendix III4D, Previous Geotechnical Testing Data.

**Table III4-6: Soil Sample Laboratory Testing Summary**

Boring	Sample Depth (ft-bgs)	Stratum	ASTM Test Method							
			D 2216	D 4318	D 1140	D 7263	D 854	D 2850	D 2435	D 5084
			Water Content	Atterberg Limits	Sieve Analysis	Unit Weight	Specific Gravity	Triaxial U/U	Consolidation (ILC)	Permeability
B-102	3-5	I	✓	✓		✓				
B-102	15-17	I	✓							
B-102	23-25	I	✓	✓	✓			✓		
B-103	0-2	I	✓							
B-103	10-12	I	✓							
B-103	18-20	I	✓							
B-103	40-42	II	✓							
B-105	0-2	I	✓							
B-105	38-40	II			✓					
B-107	5-7	I	✓							
B-107	8-10	I	✓	✓	✓					
B-108	13-15	I	✓	✓	✓					

Part III3, Waste Management Unit Design Report includes detailed engineering evaluations and analyses using the geotechnical properties of on-site soils. The analyses indicate that the soils at the facility are suitable for the intended purpose.

## 6.0 GROUNDWATER INVESTIGATION

### 6.1 Local Hydrogeology

The second stratigraphic layer, Stratum II, which is composed of sands/silty sands, is the upper water bearing unit at the site (uppermost aquifer). As mentioned in §5.2.2, the thickness of Stratum II varies from 5 to 30 feet, except in portions of the northwest corner of the proposed expansion area where it was not encountered. The extent of this stratum can be seen in Figures III4-12B through III4-12H, which depicts the monitoring wells, borings and sub-surface profiles obtained from the soil investigations at the site. Groundwater occurs primarily within Stratum II, separated from lower aquifers by underlying Stratum III, which acts as an aquiclude. The groundwater within Stratum II is also locally, partially confined by the clayey soils encountered in Stratum I. In other areas, recharge could occur through vertical flows through overlying sandy soils. Recharge areas for the Gulf Coast Aquifers are shown in Figure III4-9, [Gulf Coast Aquifers in Lower Rio Grande Valley](#). A detailed discussion of the groundwater conditions in the site area is presented in Part III5, Groundwater Characterization Report.

### 6.2 Groundwater Investigation

30 TAC §330.63(e)(5)(C)

Numerous subsurface investigations have been carried out at the facility for purposes related to geological and hydrogeological characterization, groundwater monitoring, and gas monitoring, as detailed in §4.2.1, Previous Subsurface Investigations. Initial and static water level data for these borings are compiled in Table III4-8.

**Table III4-8: Summary of Initial and Static Water Level Data**

Boring	Groundwater Elevation (ft-msl)										
	Initial	Static									
No.1	18	NR	G-4	37.0	NR	GP-27	NR	NR	GP-46	NR	NR
No.2	21	NR	G-5	20.0	20.5	MW-3A	26.0	24.5	GP-47	NR	NR
No.3	21	NR	G-6	43.0	43.0	MW-4A	20.0	17.7	PZ-113	17.5	15.4
No.4	19.5	NR	G-7	20.0	19.7	MW-7R	26.0	19.3	B-114	23.0	NR
No.5	17	NR	G-8	18.0	23.5	MW-8R	6.0	4.1	B-115	35.0	NR
No.6	19	NR	G-9	20.5	20.0	MW-9R	13.0	16.6	PZ-116	25.0	23.5
B-1	18	NR	G-10	36.0	39.5	MW-10R	14.0	15.8	B-117	30.0	NR

Groundwater flow rates were estimated for Stratum II, uppermost water-bearing unit (uppermost aquifer), using estimated hydraulic gradients, estimated hydraulic conductivities, and effective porosity for silty sand using the following formula:  $V = (ki)/n_e$ .

Where:  $V$  = velocity  
 $k$  = horizontal permeability  
 $i$  = gradient  
 $n_e$  = effective porosity

**Table III4-9: Groundwater Flow Rates**

Area of Evaluation	Hydraulic Conductivity (k) (cm/s)	Hydraulic Gradient (i) (ft/ft)*	Effective Porosity (n <sub>e</sub> )**	Groundwater flow rate (V) (ft/yr)
Currently Permitted Area (TCEQ Permit MSW-956B)	1.80 x 10 <sup>-3</sup>	0.0013	0.33	7.4
Expansion Area (Included in TCEQ Permit MSW-956C)	1.65 x 10 <sup>-4</sup>	0.0040	0.33	2.0

\* Gradient estimated from monthly potentiometric maps from February 2015 to December 2016.

\*\* Assumed for fine sands with some silt based on Freeze and Cherry (1979).

## 7.0 REFERENCES

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- Chowdhury, Ali and Robert E. Mace. 2007. Groundwater Resource Evaluation and Availability Model of the Gulf Coast Aquifer in the Lower Rio Grande Valley of Texas. (Report 368). Austin, TX. Texas Water Development Board, 129 pp. Available online at the following address: [http://www.twdb.state.tx.us/publications/reports/numbered\\_reports/doc/R368/R368\\_GulfCoastGAM.pdf](http://www.twdb.state.tx.us/publications/reports/numbered_reports/doc/R368/R368_GulfCoastGAM.pdf) (accessed October 2014)
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TABLE III-E1  
 HISTORICAL GROUNDWATER ELEVATIONS (FT MSL)  
 MONITORING WELLS

Top of Casing Elevations, 10/26/00, (ft msl)	87.58	87.54	89.41	89.36	92.73	94.57	98.38	90.46	91.34	89.99	90.04	87.49	93.49	89.19	89.22	87.73	86.74	88.33	90.10	89.81	91.48	90.99	91.07	92.33	93.20	91.32	88.38	91.35	88.06	95.15	90.72	90.35	Sampled By
Date	MW-1	MW-1R	MW-2	MW-2R	MW-3	MW-3RA	MW-3A	MW-4	MW-4R	MW-4A	MW-5	MW-6	MWD-6	MW-7	MW-7R	MWD-7	MW-8	MW-8R	MW-9	MW-9R	MW-10	MW-10R	MW-11	MW-12	MW-15	MW-15R	MW-16	MW-18	MW-18R	MW-22	MW-23	MW-24	
04/28/93	64.91	--	65.64	--	65.48	--	--	64.51	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	RUST
04/30/93	64.90	--	65.69	--	65.47	--	--	64.49	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	RUST
05/13/93	64.86	--	65.64	--	65.40	--	--	64.59	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	RUST
06/23/93	65.80	--	65.46	--	65.39	--	--	64.41	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	RUST
07/15/93	65.33	--	66.82	--	66.18	--	--	65.06	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	RUST
08/12/93	65.13	--	66.69	--	66.38	--	--	65.04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	RUST
10/16/97	63.48	--	64.21	--	64.93	--	--	66.56	--	--	65.14	67.99	--	65.39	--	--	66.04	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	ANALABS
02/11/98	63.93	--	64.76	--	65.68	--	--	64.96	--	--	65.46	65.30	--	64.75	--	--	64.09	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
02/16/98	64.01	--	64.75	--	65.72	--	--	64.84	--	--	65.62	65.49	--	65.03	--	--	64.72	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
05/07/98	63.18	--	63.91	--	66.23	--	--	65.06	--	--	65.94	65.59	--	64.69	--	--	63.24	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	ANALABS
06/16/98	62.80	--	63.25	--	65.92	--	--	64.66	--	--	65.57	65.25	--	64.22	--	--	62.80	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
06/25/98	62.77	--	63.13	--	65.82	--	--	64.60	--	--	65.48	65.17	--	64.22	--	--	62.44	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
12/04/98	63.67	--	63.48	--	66.90	--	--	65.63	--	--	66.55	66.21	--	65.76	--	--	66.71	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
01/13/99	63.68	--	63.49	--	66.75	--	--	65.54	--	--	66.00	66.09	--	65.50	--	--	65.60	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
03/22/99	63.91	--	63.55	--	66.33	--	--	65.31	--	--	66.06	65.80	--	65.14	--	--	64.74	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
07/21/99	63.74	--	63.83	--	66.08	--	--	65.13	--	--	65.76	65.52	--	65.00	--	--	64.34	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
10/26/99	63.70	--	64.21	--	65.93	--	--	64.76	--	--	65.56	65.24	--	65.10	--	--	64.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
01/27/00	63.66	--	64.49	--	65.52	--	--	64.60	--	--	65.16	64.96	--	65.54	--	--	64.89	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	SEM
05/02/00	63.68	--	64.46	--	65.15	--	--	64.36	--	--	64.77	64.60	--	64.39	--	--	64.79	--	--	63.67	--	--	--	--	--	--	--	--	--	--	--	--	SEM
06/30/00	63.88	--	64.49	--	65.32	--	--	64.31	--	--	64.65	64.46	--	64.38	--	--	65.48	--	--	64.19	--	--	--	--	--	--	--	--	--	--	--	--	SEM
09/06/00	63.46	--	64.12	--	64.18	--	--	63.88	--	--	63.79	63.69	--	63.93	--	--	64.31	--	--	63.92	--	--	--	--	--	--	--	--	--	--	--	--	SEM
10/25/00	63.35	--	63.65	--	63.99	--	--	63.64	--	--	63.68	63.55	--	63.87	--	--	64.12	--	--	63.56	--	--	--	--	--	--	--	--	--	--	--	--	SEM
01/15/01	63.17	--	63.31	--	63.88	--	--	63.45	--	--	63.62	63.56	--	63.36	--	--	63.54	--	--	63.27	--	--	--	--	--	--	--	--	--	--	--	--	SEM
07/17/01	64.73	--	63.67	--	64.43	--	--	63.42	--	--	64.11	63.84	--	63.82	--	--	67.79	--	--	64.05	--	--	--	--	--	--	--	--	--	--	--	--	SEM
08/20/01	64.35	--	63.32	--	--	--	--	63.23	--	--	--	63.50	--	63.63	--	--	66.23	--	--	63.72	--	--	--	--	--	--	--	--	--	--	--	--	SEM
10/29/01	64.02	--	63.06	--	63.64	--	--	63.11	--	--	63.40	63.29	--	63.29	--	--	65.38	--	--	63.40	--	--	--	--	--	--	--	--	--	--	--	--	SEM
12/18/01	64.71	--	63.24	--	64.01	--	--	--	--	--	--	--	--	--	--	--	66.35	--	--	63.49	--	--	--	--	--	--	--	--	--	--	--	--	SEM
01/24/02	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	63.56	--	--	--	--	--	--	--	--	--	--	--	--	SEM
03/15/02	64.18	--	63.44	--	63.96	--	--	63.22	--	--	63.77	63.49	--	63.51	--	--	65.68	--	--	63.53	--	--	--	--	--	--	--	--	--	--	--	--	SEM
04/23/02	63.89	--	63.36	--	63.74	--	--	63.16	--	--	63.51	63.39	--	63.34	--	--	65.34	--	--	63.32	--	--	--	--	--	--	--	--	--	--	--	--	SEM
10/14-15/02	64.49	--	62.92	--	64.27	--	--	63.43	--	--	64.12	63.71	--	63.59	--	--	69.69	--	--	63.40	--	--	--	--	--	--	--	--	--	--	--	--	SEM
04/16-17/03	65.51	--	64.38	--	65.92	--	--	--	64.01	--	--	65.50	65.31	--	65.37	--	--	68.77	--	--	64.22	--	--	--	--	--	--	--	--	--	--	--	SEM
10/29-30/03	--	71.13	--	66.41	--	66.96	--	--	64.23	--	--	66.99	66.30	--	66.71	--	--	78.83	--	--	66.65	--	--	65.29	66.88	--	--	--	--	--	--	--	GAI
01/14/04	--	69.23	--	68.16	--	68.20	--	--	65.91	--	--	--	--	67.65	--	--	74.55	--	--	66.79	--	--	67.25	66.20	68.13	--	--	--	--	--	--	--	GAI
01/21/04	--	68.97	--	68.03	--	68.13	--	--	65.81	--	--	--	--	67.44	--	--	73.98	--	--	66.75	--	--	67.20	66.26	68.16	--	--	--	--	--	--	--	GAI
5/19-20/04	--	69.16	--	69.46	--	69.02	--	--	66.25	--	--	--	--	68.30	--	--	72.33	--	--	68.14	--	--	66.75	68.99	--	--	--	--	--	--	--	--	GAI
7/14-15/2004	--	70.56	--	70.30	--	69.59	--	--	68.12	--	--	--	--	68.83	--	--	73.10	--	--	69.30	--	--	67.86	67.18	69.58	--	--	--	--	--	--	--	GAI
11/11-12/2004	--	69.79	--	71.44	--	70.59	--	--	69.64	--	--	--	--	70.54	--	--	74.10	--	--	70.15	--	--	68.92	69.05	70.18	--	--	--	--	--	--	--	GAI
2/15-16/2005	--	69.92	--	70.49	--	70.40	--	--	69.19	--	--	--	--	62.62	--	--	72.56	--	--	69.85	--	--	69.46	68.77	70.11	--	--	--	--	--	--	--	GAI
5/17-18/2005	--	69.92	--	70.46	--	70.21	--	--	68.87	--	--	--	--	69.42	--	--	72.84	--	--	69.96	--	--	69.72	68.73	69.99	--	--	--	--	--	--	--	GAI
9/13-15/2005	--	67.93	--	68.58	--	69.49	--	--	67.44	--	--	--	--	--	--	--	--	--	--	--	--	--	68.15	70.53	--	--	--	--	--	--	--	--	GAI
11/30/05	--	67.69	--	67.46	--	68.16	--	--	67.97	--	--	--	--	68.00	--	--	70.11	--	--	67.51	--	--	67.87	67.53	68.21	--	--	--	--	--	--	--	GAI
5/30-31/2006	--	67.21	--	66.68	--	66.78	--	--	66.48	--	--	--	--	66.72	--	--	68.95	--	--	66.90	--	--	66.82	66.82	67.57	--	--	67.71	--	--	--	--	GAI
09/29/06	--	75.28	--	70.18	--	70.43	--	--	70.35	--	--	--	--	71.04	--	--	78.09	--	--	70.12	--	--	70.03	71.55	70.39	71.13	--	--	69.90	--	--	--	GAI
10/30-31/2006	--	75.94	--	73.34	--	71.92	--	--	72.98	--	--	--	--	73.35	--	--	79.02	--	--	73.31	--	--	71.31	73.09	72.14	73.15	--	--	72.56	--	--	--	GAI
12/18-19/2006	--	73.32	--	72.41	--	72.27	--	--	72.59	--	--	--	--	72.87	--	--	75.30	--	--	71.87	--	--	71.93	72.40	72.33	72.45	--	--	72.71	--	--	--	GAI
3/21-22/2007	--	73.92	--	72.68	--	72.36	--	--	71.56	--	--	--	--	72.89	--	--	75.79	--	--	71.06	--	--	71.15	71.42	72.31	72.42	--	--	73.20	--	--	--	GAI
5/22-23/2007	--	72.61	--	72.56	--	71.94	--	--	72.53	--	--	--	--	71.91	--	--	73.18	--	--	72.53	--	--	72.79	71.02	71.74	72.03	--	--	72.04	--	--	--	GAI
08/02/07	--	--	--	73.68	--	72.38	--	--	72.72	--	--	--	--	72.53	--	--	77.33	--	--	--	--	--	73.42	72.64	--	--	--	--	--	--	--	--	GAI
09/05/07	--	74.14	--	75.87	--	74.96	--	--	74.88	--	--	--	--	75.03	--	--	76.17	--	--	75.16	--	--	75.23	74.17	74.83	--	--	--	--	--	--	--	GAI
12/18-19/2007	--	74.45	--	73.54	--	72.67	--																										



TABLE III4E1  
 HISTORICAL GROUNDWATER ELEVATIONS (FT MSL)  
 MONITORING WELLS

Top of Casing Elevations, 10/26/00, (ft msl)	87.58	87.54	89.41	89.36	92.73	94.57	98.38	90.46	91.34	89.99	90.04	87.49	93.49	89.19	89.22	87.73	86.74	88.33	90.10	89.81	91.48	90.99	91.07	92.33	93.20	91.32	88.38	91.35	88.06	95.15	90.72	90.35	Sampled By
Date	MW-1	MW-1R	MW-2	MW-2R	MW-3	MW-3RA	MW-3A	MW-4	MW-4R	MW-4A	MW-5	MW-6	MWD-6	MW-7	MW-7R	MWD-7	MW-8	MW-8R	MW-9	MW-9R	MW-10	MW-10R	MW-11	MW-12	MW-15	MW-15R	MW-16	MW-18	MW-18R	MW-22	MW-23	MW-24	
02/23/10-02/24/10	--	76.89	--	75.61	--	74.37	--	--	74.57	--	--	--	--	75.08	--	--	77.62	--	75.26	--	75.26	--	74.40	74.30	75.86	--	--	76.17	--	--	--	GAI	
4/6-4/7/2010	--	76.19	--	75.41	--	74.52	74.76	--	74.64	74.87	--	--	74.49	--	75.57	--	--	77.02	--	75.50	--	76.12	74.02	74.69	--	74.27	74.17	76.25	75.47	74.75	75.05	76.39	GAI
7/20-7/21/2010	--	79.79	--	77.91	--	--	75.88	--	--	76.37	--	--	75.54	--	78.32	--	--	80.11	--	78.26	--	76.84	--	75.93	--	76.52	76.73	--	77.16	75.85	76.52	77.70	GAI
11/9-11/11/2010	--	79.19	--	78.33	--	76.90	77.18	--	77.74	77.89	--	--	75.44	77.99	78.52	--	79.05	79.18	77.83	78.36	77.58	78.64	77.12	77.18	77.85	76.87	76.58	78.40	77.81	77.20	77.72	79.16	GAI
12/13/10	--	--	--	78.11	--	76.52	--	--	77.19	--	--	--	--	77.45	--	--	--	--	--	--	--	--	--	76.50	--	--	--	--	--	--	--	--	GAI
2/22-2/24/2011	--	77.58	--	76.74	--	--	76.33	--	--	76.93	--	--	75.46	--	77.30	--	--	77.99	--	76.94	--	77.38	76.54	76.01	--	76.07	75.46	--	76.38	76.26	76.40	77.71	GAI
6/21-6/22/2011	--	73.51	--	73.38	--	--	74.86	--	--	74.68	--	--	73.32	--	74.64	--	--	74.20	--	73.73	--	73.97	75.49	74.24	--	74.53	73.78	--	72.76	74.63	74.00	74.01	GAI
12/12-12/13/2011	--	71.34	--	69.88	--	--	72.06	--	--	72.80	--	--	71.79	--	72.78	--	--	72.54	--	70.73	--	71.00	73.05	72.29	--	73.07	72.53	--	71.20	71.67	70.94	71.33	GAI
01/19/12	--	--	--	69.62	--	--	--	--	72.78	72.38	--	--	71.71	--	--	--	--	--	--	70.22	--	--	--	--	--	--	--	--	70.65	71.51	70.51	--	GAI
6/27-6/28/2012	--	69.86	--	68.57	--	--	70.41	--	--	70.48	--	--	69.69	--	70.15	--	--	71.03	--	68.05	--	69.44	71.40	70.69	--	71.98	72.18	--	70.55	69.83	69.09	69.87	GAI
07/25/12	--	69.08	--	--	--	--	--	--	69.93	69.15	--	--	--	--	--	--	--	--	--	68.55	--	--	--	--	--	--	--	--	--	--	--	69.19	GAI
12/10-12/11/2012	--	67.78	--	66.43	--	--	68.23	--	--	68.59	--	--	68.94	--	68.45	--	--	68.74	--	66.90	--	67.46	68.87	68.59	--	69.73	70.06	--	69.65	67.69	67.01	67.70	GAI
01/07/13	--	67.42	--	66.28	--	--	68.30	--	68.50	71.71	--	--	68.65	--	--	--	--	--	--	--	--	--	--	--	--	69.11	--	--	--	--	67.53	--	GAI
03/27/13	--	--	--	--	--	--	--	--	--	--	--	--	--	--	68.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	GAI
06/12 - 06/13/13	--	66.68	--	65.49	--	--	72.70	--	--	66.88	--	--	67.40	--	67.13	67.82	--	67.33	--	65.86	--	66.35	67.27	67.26	--	67.32	67.60	--	67.55	66.21	65.70	66.60	GAI
07/19/13	--	--	--	66.46	--	--	67.33	--	--	66.90	--	--	71.71	--	--	--	--	--	--	66.29	--	--	--	--	--	--	70.65	--	68.42	--	--	67.24	GAI
09/25/13	--	--	--	--	--	--	--	--	--	--	--	--	--	--	70.60	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	GAI
12/13 - 12/14/13	--	71.07	--	67.79	--	--	69.25	--	--	69.64	--	--	70.33	--	71.68	70.73	--	72.13	--	68.09	--	68.99	69.72	69.92	--	69.88	70.14	--	70.86	68.49	67.97	70.97	GAI
02/04/14	--	71.63	--	68.40	--	--	69.43	--	--	70.12	--	--	70.53	--	--	--	--	--	--	68.60	--	--	--	70.02	--	--	70.43	--	--	--	--	71.21	GAI
03/21/14	--	71.82	--	68.77	--	--	69.49	--	--	70.43	--	--	70.49	--	72.18	70.95	--	73.24	--	69.10	--	69.93	70.26	69.94	--	70.52	70.84	--	70.82	69.04	68.69	71.61	GAI
6/21 - 6/22/14	--	69.65	--	67.97	--	--	69.39	--	--	69.34	--	--	69.98	--	69.59	69.72	--	70.70	--	68.48	--	69.28	69.95	69.78	--	70.34	70.31	--	70.09	68.87	68.35	69.94	GAI
07/25/14	--	68.95	--	65.68	--	--	--	--	--	66.82	--	--	69.78	--	--	--	--	69.23	--	68.02	--	67.31	--	68.21	--	--	71.04	--	--	--	--	67.92	GAI
09/05/14	--	--	--	--	--	--	--	--	--	--	--	--	--	--	69.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	GAI
12/10 - 12/11/14	--	71.80	--	69.17	--	--	70.43	--	--	70.20	--	--	71.16	--	72.15	71.96	--	72.95	--	69.31	--	69.77	70.63	70.72	--	74.19	72.51	--	71.64	69.91	69.15	71.29	GAI
01/13/15	--	73.22	--	69.96	--	--	--	--	--	71.63	--	--	71.86	--	73.39	--	--	--	--	69.79	--	--	70.50	--	--	--	74.45	--	72.33	--	--	72.84	GAI
2/24 - 2/25/15	--	72.95	--	70.26	--	--	71.10	--	--	71.77	--	--	71.86	--	73.12	72.02	--	75.23	--	70.52	--	71.31	71.88	71.61	--	72.98	73.42	--	72.21	70.71	70.33	72.67	GAI
03/25/15	--	73.14	--	70.41	--	--	71.38	--	--	72.09	--	--	75.99	--	73.72	72.03	--	75.23	--	70.71	--	71.59	72.37	71.68	--	73.42	73.88	--	72.21	71.05	70.52	72.90	GAI
04/20 - 4/21/15	--	79.24	--	72.69	--	--	72.00	--	--	73.82	--	--	72.28	--	75.59	73.41	--	79.07	--	72.74	--	72.57	73.33	72.21	--	74.01	73.89	--	73.73	71.81	71.97	75.58	GAI
05/28/15	--	81.73	--	74.63	--	--	73.84	--	--	76.34	--	--	73.34	--	78.27	75.27	--	81.65	--	75.89	--	79.16	75.25	73.55	--	74.97	75.27	--	73.60	74.27	74.07	79.36	GAI
06/22 - 06/26/15	--	82.62	--	76.01	--	--	74.91	--	--	76.66	--	--	74.26	--	79.47	76.90	--	82.51	--	76.19	--	76.02	77.19	75.46	--	77.62	76.81	--	74.57	74.91	75.04	83.89	GAI
7/27 - 7/30/2015	--	78.97	--	75.06	--	--	76.03	--	--	77.21	--	--	75.54	--	78.02	76.09	--	79.63	--	75.26	--	76.13	77.39	75.99	--	77.20	77.17	--	75.66	75.71	75.10	77.45	GAI
8/20-21/2015	--	77.49	--	74.66	--	--	75.75	--	--	76.51	--	--	75.63	--	76.78	75.31	--	77.94	--	74.96	--	75.72	76.88	75.76	--	76.75	77.07	--	75.61	75.36	74.62	77.32	GAI
9/28-29/2015	--	76.65	--	74.51	--	--	75.64	--	--	76.02	--	--	75.95	--	76.15	75.24	--	77.00	--	74.77	--	75.50	76.45	75.86	--	76.74	77.05	--	75.95	75.18	74.56	77.32	GAI
10/19/15	--	76.43	--	74.41	--	--	75.51	--	--	75.85	--	--	75.99	--	76.02	75.13	--	76.80	--	74.66	--	75.40	76.30	75.77	--	76.59	77.03	--	76.07	75.06	74.46	76.36	GAI
11/16/15	--	77.64	--	75.63	--	--	76.34	--	--	76.84	--	--	76.39	--	77.30	75.97	--	78.41	--	75.77	--	76.55	77.05	76.50	--	77.30	76.81	--	76.54	75.72	75.22	77.64	GAI
12/7-10/2015	--	77.17	--	75.40	--	--	76.11	--	--	76.69	--	--	76.02	--	76.95	75.70	--	77.81	--	75.65	--	76.41	76.82	76.19	--	77.10	77.08	--	76.17	75.70	75.29	77.19	GAI
1/25-26/2016	--	76.73	--	75.12	--	--	75.93	--	--	76.47	--	--	75.78	--	76.70	75.25	--	77.28	--	75.30	--	75.96	77.73	76.02	--	76.97	77.05	--	75.79	75.58	75.11	75.68	GAI
02/15/16	--	76.55	--	74.96	--	--	75.87	--	--	76.31	--	--	75.70	--	76.49	75.13	--	77.02	--	75.31	--	75.92	76.59	75.89	--	76.91	76.98	--	75.73	75.51	74.09	76.57	GAI
03/28/16	--	76.08	--	74.61	--	--	75.47	--	--	75.86	--	--	75.29	--	76.01	74.50	--	76.46	--	74.92	--	75.51	76.16	75.40	--	76.48	76.51	--	75.28	75.16	74.69	76.08	GAI
6/27-29/2016	--	74.86	--	73.32	--	--	75.49	--	--	75.61	--	--	75.54	--	76.12	74.50	--	77.47	--	73.70	--	73.90	75.99	74.78	--	76.29	76.64	--	75.54	74.93	73.97	74.91	GAI
9/7-8/2016	--	--	--	--	--	--	--	--	--	--	--	--	--	--	73.14	--	--	--	--	72.48	--	72.67	75.07	--	75.20	75.46	--	73.82	--	--	74.44	GAI	
11/30 - 12/1 2016	--	73.10	--	70.23	--	--	73.31	--	--	74.11	--	--	73.34	--	74.16	71.45	--	74.56	--	71.73	--	72.25	74.47	73.40	--	74.79	74.94	--	72.56	72.80	71.73	72.94	GAI
HISTORIC HIGH	65.80	82.62	66.82	78.33	66.90	76.90	77.18	66.56	77.74	77.89	66.99	67.99	76.39	77.99	79.47	76.90	79.05	82.51	77.83	78.36	77.58	79.16	77.73	77.18	77.85	77.62	77.17	78.40	77.81	77.20	77.72	83.89	
HISTORIC LOW	62.77	66.68	62.92	65.49	63.64	66.78	67.33	63.11	64.01	66.82	63.40	63.29	67.40	62.62	67.13	67.																	



TABLE III4E2  
 HISTORICAL GROUNDWATER ELEVATIONS (FT-MSL)  
 PIEZOMETERS

Piezometer	Top of Casing Elevation (ft-msl)	Date																	
		Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Jun-16	Dec-16
		Groundwater Elevation (ft-msl)																	
PZ-101	101.73	68.61	69.79	70.58	71.23	71.77	-	74.13	74.65	74.39	74.24	74.07	74.49	74.63	74.74	74.75	74.63	73.78	72.52
PZ-104	99.02	66.98	67.36	67.95	68.42	69.63	-	74.18	75.41	75.13	74.56	74.14	74.34	74.27	74.08	73.97	73.75	73.20	71.97
PZ-106	88.17	58.98	59.24	59.55	59.77	60.30	-	68.00	65.75	64.25	63.39	63.05	64.17	63.90	63.79	63.75	63.40	62.97	61.47
PZ-113	89.79	70.37	71.03	72.15	72.49	75.49	78.4	80.79	78.07	76.71	75.96	75.75	76.75	76.74	76.70	76.61	76.25	75.49	74.22
PZ-116	96.56	69.7	70.22	70.80	71.21	72.45	-	76.20	76.98	76.84	76.36	76.03	76.27	76.28	76.07	75.94	75.57	75.06	73.65
PZ-118	93.22	62.03	62.24	62.59	62.82	63.51	76.54	66.59	66.68	66.52	68.34	66.04	66.40	66.47	66.71	66.71	66.54	66.17	64.89
PZ-122	96.14	-	56.26	56.55	56.44	57.01	-	-	57.34	-	56.68	56.64	57.19	57.50	57.87	57.96	58.10	58.04	57.14
PZ-124	101.67	67.41	67.68	67.72	67.77	68.11	-	70.60	71.54	71.28	71.45	71.16	71.88	71.73	71.76	71.63	71.36	71.44	70.13
PZ-130	104.39	-	66.36	66.74	67.09	67.29	-	68.44	68.74	68.65	69.16	69.11	69.84	69.84	70.30	70.39	70.14	70.03	69.26
PZ-131	100.09	70.4	68.2	71.44	71.49	72.34	86.47	75.59	76.48	75.77	75.36	75.10	75.70	75.51	75.41	75.31	74.81	74.49	72.92
PZ-133	101.96	78.34	68.8	68.91	69.06	69.44	-	71.54	72.36	72.54	72.74	72.71	73.10	73.10	73.28	73.28	73.18	73.08	72.31
PZ-134	86.11	71.98	72.49	73.02	73.11	80.68	82.66	83.04	78.96	77.31	76.66	76.45	77.39	76.91	76.58	76.40	75.98	74.36	73.06



PERMIT AMENDMENT APPLICATION

Part III, Attachment 5

# GROUNDWATER CHARACTERIZATION AND MONITORING REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



### 1.4.2 Local Groundwater Quality

Groundwater quality data from the facility's monitoring wells and piezometers indicate that total dissolved solids content ranges from 690-25,500 mg/L. Therefore, the facility's groundwater quality is considered fresh to saline.

### 1.4.3 Groundwater Monitoring Data

A tabulation of all relevant groundwater monitoring data from wells on site is presented in Part III4F, Historic Groundwater Quality Testing Data. The groundwater monitoring data includes results of all semi-annual and applicable quarterly groundwater monitoring events since 2005.

## 2.0 GROUNDWATER MONITORING

30 TAC §330.401(d)-(f)

To ensure both a conservative approach to groundwater monitoring at the facility and ensure the detection of any contaminants that may potentially be released to the uppermost aquifer, the facility currently monitors the groundwater present in Stratum II at the point of compliance with a well spacing of approximately 600 feet. Once established at a solid waste management unit, groundwater monitoring must be conducted throughout the active life and any required post-closure care period of that solid waste management unit as specified in 30 TAC §330.463.

Groundwater monitoring requirements under 30 TAC §§330.403, 330.405, 330.407, and 330.409 may be suspended by the TCEQ for a solid waste management unit if the City can demonstrate that there is no potential for migration of hazardous constituents from that solid waste management unit to the uppermost aquifer during the active life and the closure and post-closure care period of the unit. This demonstration shall be certified by a qualified groundwater scientist and approved by the TCEQ, and must be based upon:

- site-specific field-collected measurements, sampling, and analysis of physical, chemical, and biological processes affecting contaminant fate and transport; and
- contaminant fate and transport predictions that maximize contaminant migration and consider impacts on human health and the environment.

### 2.2.2.1 Previously Permitted Groundwater Monitoring Well Network

The monitoring well network of TCEQ Permit MSW-956B included 14 wells (MW-1 through MW-14) screened in the upper water-bearing unit. MW-1 through MW-4 were installed in 1993 and MW-5 through MW-8 in 1996. MW-9 through MW-12 and MW-14 were installed in 2000. In 2003, replacement wells MW-1R through MW-4R were installed, followed by further reinstallation of well MW-3RA. In 2005, MW-15 and MW-18 were added to the existing monitoring well system. In 2009, the following wells were replaced/relocated – MW-3A, MW-4A, MW-7R, MW-8R, MW-9R, MW-10R, MW-15R, and MW-18R. In addition, MW-16 and MW-22 through MW-24 were installed in 2009. The Edinburg Sanitary Landfill TCEQ Permit MSW-956B and Type IV Landfill TCEQ Permit MSW-2302 share a common permit boundary along the southwestern portion of the facility. In 2013, wells MWD-6 and MWD-7 were installed along this southern boundary to monitor the same groundwater unit as the Type IV Landfill. These wells are located 30 feet of the southern permit boundary of the Type I landfill. Apart from the wells which were relocated or replaced, wells MW-5, MW-6, and MW-14 were plugged in 2004, 2008, and 2000 respectively. MW-13, MW-14R, MW-17, MW-19, MW-20, and MW-21 are part of the current monitoring well network that are permitted for future installation.

Table III5-1 lists the monitoring wells that are part of the monitoring well network of TCEQ Permit MSW-956B. Appendix III5A, Existing Monitoring Well Information presents the available well installation records for the current and historic monitoring wells.

**Table III5-1: Previously Permitted Groundwater Monitoring Well Network**

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-1R	16,670,451.01	1,104,162.79	84.7	87.5	20	25	64.7	59.7
MW-2R	16,668,465.10	1,103,816.69	86.5	89.4	25	30	61.5	56.5
MW-3A	16,668,167.98	1,105,587.63	95.7	98.4	31	41	64.7	54.7
MW-4A	16,670,162.92	1,105,941.09	87.3	90.0	27	37	60.3	50.3
MWD-6	16,667,949.81	1,106,763.82	90.6	93.5	35	45	55.6	45.6
MWD-7	16,670,250.28	1,105,347.96	85.0	87.7	21	31	65.0	55.0
MW-7R	16,667,810.34	1,107,955.19	86.4	89.2	26	36	60.4	50.4
MW-8R	16,670,347.68	1,104,753.77	85.1	88.3	26	36	59.1	49.1
MW-9R	16,669,023.33	1,103,878.53	86.8	89.8	27	37	59.8	49.8
MW-10R	16,669,618.10	1,103,965.73	88.2	91.0	26	36	62.2	52.2
MW-11	16,670,058.17	1,106,488.44	88.4	91.1	27	37	61.4	51.4
MW-12	16,668,084.93	1,106,178.78	89.8	92.3	30.1	40.1	59.8	49.8
MW-13*	16,667,722.74	1,108,566.75	90.4	-	-	-	-	-

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Submitted: July 2017

Revised: November 2017

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-14R*	16,669,889.35	1,108,856.78	96.9	-	-	-	-	-
MW-15R	16,670,041.53	1,107,087.42	88.3	91.3	26.5	36.5	61.8	51.8
MW-16	16,669,923.37	1,107,650.60	85.8	88.4	22	32	63.8	53.8
MW-17*	16,668,909.26	1,108,747.81	83.1	-	-	-	-	-
MW-18R	16,667,902.08	1,107,362.25	85.3	88.1	22	32	63.3	53.3
MW-19*	16,669,975.70	1,108,263.02	102.6	-	-	-	-	-
MW-20*	16,669,502.20	1,108,839.55	84.1	-	-	-	-	-
MW-21*	16,668,316.32	1,108,656.07	94.0	-	-	-	-	-
MW-22	16,668,253.10	1,104,999.75	93.0	95.2	28	38	65.0	55.0
MW-23	16,668,353.05	1,104,406.40	87.9	90.7	17	27	70.9	60.9
MW-24	16,670,208.81	1,104,062.92	87.2	90.4	25	35	62.2	52.2

Note: \*These wells are part of the groundwater monitoring well network approved under TCEQ Permit MSW-956B, but haven't been installed as of the date of this report.

1. [Coordinates provided in Texas State Plane South Zone NAD83](#)

### 2.2.2.2 Groundwater Monitoring Well Network

The groundwater monitoring system will consist of a total of 38 groundwater monitoring wells requiring modifications to the approved network of monitoring well of TCEQ Permit MSW-956B; retain 12 wells, plug and abandon 12 wells, and install 26 additional wells as depicted on Figure III5-1, Proposed Groundwater Monitoring System. The twelve existing monitoring wells to be properly plugged and abandoned are MW-1R, MW-4A, MW-7R, MW-8R, MW-11, MW-14R, MW-15R, MW-16, MW-17, MW-19, MW-20, and MW-21. The additional 26 monitoring wells to be installed are MW-101 through MW-115 along the northern permit boundary, MW-116 through MW-122 along the eastern permit boundary; and MW-123 through MW-126 along the southern permit boundary. The removal of existing monitoring wells and installation of the additional wells will be sequenced to coincide with the schedule of site development outlined in Part II, Facility Layout. Wells will be installed prior to waste placement in the adjacent disposal unit.

**Table III5-2: Groundwater Monitoring Well Network**

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
<i>Monitoring Wells to Remain</i>								
MW-2R	16,668,465.10	1,103,816.69	86.5	89.4	25	30	61.5	56.5

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-3A	16,668,167.98	1,105,587.63	95.7	98.4	31	41	64.7	54.7
MWD-6	16,667,949.81	1,106,763.82	90.6	93.5	35	45	55.6	45.6
MWD-7	16,670,250.28	1,105,347.96	85.0	87.7	21	31	65.0	55.0
MW-9R	16,669,023.33	1,103,878.53	86.8	89.8	27	37	59.8	49.8
MW-10R	16,669,618.10	1,103,965.73	88.2	91.0	26	36	62.2	52.2
MW-12	16,668,084.93	1,106,178.78	89.8	92.3	30.1	40.1	59.8	49.8
MW-13*	16,667,722.74	1,108,566.75	90.4	-	-	-	-	-
MW-18R	16,667,902.08	1,107,362.25	85.3	88.1	22	32	63.3	53.3
MW-22	16,668,253.10	1,104,999.75	93.0	95.2	28	38	65.0	55.0
MW-23	16,668,353.05	1,104,406.40	87.9	90.7	17	27	70.9	60.9
MW-24	16,670,208.81	1,104,062.92	87.2	90.4	25	35	62.2	52.2
<i>Additional Monitoring Wells to be Installed</i>								
MW-101	16,670,791.71	1,104,169.10	83.4	-	20	30	63.4	53.4
MW-102	16,670,787.29	1,104,623.01	83.6	-	20	30	63.6	53.6
MW-103	16,670,705.22	1,105,156.73	84.0	-	20	30	64.0	54.0
MW-104	16,670,622.82	1,105,690.41	85.3	-	18	28	67.3	57.3
MW-105	16,670,540.42	1,106,224.08	86.9	-	18	28	68.9	58.9
MW-106	16,670,458.17	1,106,757.78	87.5	-	18	28	69.5	59.5
MW-107	16,670,385.39	1,107,290.48	92.2	-	20	30	72.2	62.2
MW-108	16,670,836.34	1,107,371.57	98.7	-	25	35	73.7	63.7
MW-109	16,671,423.26	1,107,462.38	93.5	-	30	40	63.5	53.5
MW-110	16,671,972.46	1,107,598.57	95.9	-	25	35	70.9	60.9
MW-111	16,671,885.23	1,108,177.04	92.1	-	25	35	67.1	57.1
MW-112	16,671,798.19	1,108,752.57	90.6	-	34	44	56.6	46.6
MW-113	16,671,708.81	1,109,334.62	95.3	-	33	43	62.3	52.3
MW-114	16,671,620.14	1,109,912.86	85.8	-	28	38	57.8	47.8
MW-115	16,671,531.11	1,110,492.95	82.2	-	25	35	57.2	47.2
MW-116	16,670,961.59	1,110,572.09	88.4	-	25	35	63.4	53.4
MW-117	16,670,387.13	1,110,597.01	87.6	-	30	40	57.6	47.6
MW-118	16,669,812.67	1,110,621.93	88.7	-	20	30	68.7	58.7
MW-119	16,669,402.58	1,110,842.39	92.6	-	35	45	57.6	47.6
MW-120	16,668,987.79	1,111,045.55	93.8	-	40	50	53.8	43.8
MW-121	16,668,413.22	1,111,067.56	96.3	-	40	50	56.3	46.3
MW-122	16,667,838.65	1,111,089.58	99.4	-	40	50	59.4	49.4
MW-123	16,667,379.28	1,110,767.39	98.7	-	43	53	55.7	45.7
MW-124	16,667,461.31	1,110,228.55	97.6	-	43	53	54.6	44.6

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-125	16,667,549.21	1,109,660.31	93.7	-	43	53	50.7	40.7
MW-126	16,667,637.14	1,109,092.08	96.8	-	45	55	51.8	41.8

Note:

\*These wells are part of the groundwater monitoring well network approved under TCEQ Permit MSW-956B, but haven't been installed as of the date of this report.

- Anticipated construction details are provided for additional monitoring wells to be installed and are estimates inferred from cross-sections presented in Part III4, Geology Report. Actual screen depths need to be determined based on field observations during borehole drilling.

1. [Coordinates provided in Texas State Plane South Zone NAD83](#)

### 2.2.3 Monitoring Well Construction

30 TAC §330.421(a)

Monitoring well construction shall provide for maintenance of the integrity of the bore hole, collection of representative groundwater samples from the water-bearing zone of concern, and prevention of migration of groundwater and surface water within the bore hole. The following specifications must be used for the installation of groundwater monitoring wells at municipal solid waste landfills. Equivalent alternatives to these specifications may be used if prior written approval is obtained in advance from the TCEQ. Figure III5-2, Proposed Monitoring Well Construction Details present the required specifications for installation of a monitoring well.

Damaged monitoring wells that are no longer usable will be reported to the TCEQ Executive Director for a determination whether to replace or repair the well. In accordance with 30 TAC §305.70(j), if a compromised well requires replacement, a permit modification request will be submitted within 45 days of the discovery. Plugging and abandoning of monitoring wells will be performed in accordance with 16 TAC §76.104. No abandonment will be performed without prior written authorization from the TCEQ.

#### 2.2.3.1 Drilling

30 TAC §330.421(a)(1)(A)-(D)

Monitoring wells must be drilled by a Texas-licensed driller who is qualified to drill and install monitoring wells. The installation and development shall be supervised by a licensed professional geoscientist or engineer who is familiar with the geology of the area and a log of the boring shall be completed, sealed, signed, and dated by the licensed professional.

recommended to provide maximum inflow area. Field-cut slots are not permitted for well screen. Filter cloth shall not be used. A blank-pipe sediment trap, typically one to two feet, should be installed below the screen. A bottom cap will be placed on the bottom of the sediment trap. The sediment trap shall not extend through the lower confining layer of the water-bearing zone being monitored. Screen sterilization methods are the same as those for casing. Selection of the size of the screen opening should be done by a person experienced with such work and shall include consideration of the distribution of particle sizes both in the water-bearing zone and in the filter pack surrounding the screen. The screen opening shall not be larger than the smallest fraction of the filter pack.

#### 2.2.3.2.3 Filter Pack

30 TAC §330.421(a)(2)(C)

The filter pack, placed between the screen and the well bore, shall consist of prepackaged, inert, clean silica sand or glass beads; it shall extend from one to four feet above the top of the screen. Open stockpile sources of sand or gravel are not permitted. The filter pack usually has a 30% finer grain size that is about four to ten times larger than the 30% finer grain size of the water-bearing zone; the filter pack should have a uniformity coefficient less than 2.5.

#### 2.2.3.2.4 Annular Seal

30 TAC §330.421(a)(2)(D)

The annular seal shall be placed on top of the filter pack and shall be at least two feet thick. It should be placed in the zone of saturation to maintain hydration. The seal should be composed of coarse-grain sodium bentonite, coarse-grit sodium bentonite, or bentonite grout. Special care should be taken to ensure that fine material or grout does not plug the underlying filter pack. Placement of one foot-a few inches of prepackaged clean fine sand on top of the filter pack will help to prevent migration of the annular seal material into the filter pack. The bentonite shall be hydrated with clean water prior to any further activities on the well and left to stand until hydration is complete (eight to 12 hours, depending on the grain size of the bentonite). If a bentonite-grout (without cement) casing seal is used in the well bore, then it may replace the annular seal described in this paragraph.

#### 2.2.3.2.5 Casing Seal

30 TAC §330.421(a)(2)(E)

A casing seal shall be placed on top of the annular seal to prevent fluids and contaminants from entering the borehole from the surface. The casing seal shall consist of a commercial bentonite grout or a cement-bentonite mixture. Drilling spoil, cuttings, or other native materials are not permitted for use as



PERMIT AMENDMENT APPLICATION

Part III, Attachment 5, Appendix B

# GROUNDWATER SAMPLING AND ANALYSIS PLAN (GWSAP)

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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Appendix III5B-3	TCEQ Guidance Documents and Forms
III5B-3A	MSW-Practical Quantitation Limit (PQL) Study dated 5-25-10
III5B-3B	Background Evaluation Report dated 8-30-10
III5B-3C	Guidelines for Groundwater Monitoring Report Submittals dated 12-22-14
III5B-3D	TCEQ Groundwater Sampling Report TCEQ-0312
III5B-3E	MSW Lab Checklist

## 1.0 GROUNDWATER SAMPLING AND ANALYSIS PROCEDURES

30 TAC §§330.63(f)(6)(E), 330.405(a), 330.405(b)(1), 330.405(b)(3), and 330.405(b)(3)(A)

Consistent analysis procedures are designed to ensure monitoring results that provide an accurate representation of groundwater quality at the groundwater monitor wells. These sampling and analytical methods are appropriate for groundwater sampling and that accurately measure hazardous constituents and other monitoring parameters in groundwater samples. Provided within this section of the GWSAP are procedures and techniques for sample collection, sample preservation and shipment, analytical procedures, chain of custody controls, and quality assurance and quality control. The City shall collect an appropriate number of samples necessary to establish groundwater quality data consistent with the appropriate statistical procedures for detection, assessment, and corrective measures.

### 1.1 Groundwater Sampling Procedures

#### 1.1.1 Well Inspection

Prior to performing any purging or sampling, each monitoring well will be inspected to assess its integrity. The visual inspection will include the well lock, static water level measuring mark, protective steel casing, concrete pad, and monitor well casing for signs of damage by vandalism, animals, heavy equipment, or other causes. The objective of the visual inspection is to confirm that no outside constituents or other conditions exist that may affect the quality of the sampling. All necessary repairs or maintenance that can be accomplished without a TCEQ modification request will be conducted immediately by the City and documented on the Field Sampling Data Sheet for that well. If it is determined that the integrity of the well has been, or may have been, compromised the necessary information will be documented and the Executive Director of the TCEQ notified. No additional actions will be taken without the approval of the TCEQ.

#### 1.1.2 Sample Collection

##### 1.1.2.1 Equipment Decontamination

All equipment used for water-level measurement, purging, and/or the collection of groundwater samples will be decontaminated prior to use at each well location, unless the equipment is dedicated to a specific well. Appropriate decontamination procedures consists of scrubbing all equipment with a solution of Alconox® or equivalent laboratory grade detergent and deionized, tap, or distilled water, then triple rinsing with deionized or distilled water. Separate containers for each rinsate will be individually set up at each monitor well. At the conclusion of the sampling, all the rinsate will be properly disposed with the water generated during purging.

- install at least one additional monitoring well between the monitoring well with the statistically significant level and the next adjacent wells along the point of compliance before the next sampling event and sample these wells;
- notify in writing all persons that own or occupy the land that directly overlies any part of the plume of contamination if contaminants have migrated off-site as indicated by sampling of wells; and
- initiate Assessment of Corrective Measures Program all within 90 days of the notice to the TCEQ.

### 3.6.2 *Alternate Source Demonstration*

30 TAC §330.409(g)(2)-(3)

The City may demonstrate that a source other than the monitored solid waste management unit caused the contamination or that the SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. In making an alternative source demonstration (ASD), the City must:

- notify the TCEQ in writing within 14 days of determining a SSL above the GWPS at the point of compliance that the City intends to make an ASD;
- within 90 days of determining a SSL above the GWPS, submit a report to the TCEQ that demonstrates that a source other than the monitored solid waste management unit caused the contamination or that the SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The report shall be prepared and certified by a qualified groundwater scientist;
- not filter the groundwater samples for constituents addressed by the demonstration prior to laboratory analysis. The TCEQ may also require the City to provide analysis of landfill leachate to support the demonstration; and
- continue to monitor in accordance with the Assessment Monitoring Program.

If a successful ASD is made, the City shall continue monitoring in accordance with the Assessment Monitoring Program and may return to detection monitoring after two consecutive sampling events if the Assessment Monitoring Constituents are at or below established background concentrations. Until a successful demonstration is made, the City shall comply with the requirements of this section including initiating an assessment of corrective measures.

### 3.7 *Assessment of Corrective Measures*

30 TAC §330.63(f)(7)

If hazardous constituents have been measured in the groundwater that exceed the concentration limits of the established GWPS, the City shall submit sufficient information, supporting data, and analyses to establish a corrective action program that meets the requirements of 30 TAC §330.411 and §330.413 relating to Assessment of Corrective Measures and Selection of Remedy, respectively. To demonstrate compliance with of 30 TAC §330.411, the City shall address, at a minimum, the following:

- a characterization of the contaminated groundwater, including concentrations of assessment constituents as defined in §330.409 of this title;
- the concentration limit for each constituent found in the groundwater;
- detailed plans and an engineering report describing the corrective action to be taken;
- a description of how the groundwater monitoring program will demonstrate the adequacy of the corrective action; and
- a schedule for submittal of the aforementioned information required provided the City obtains written authorization from the TCEQ prior to submittal of the complete permit application.

Implementation of the Corrective Action Program will be conducted in accordance with 30 TAC § 330.415.

### 3.8 Annual Assessment Monitoring Report

30 TAC §§330.63(f)(6)(A), 330.409(k), & 330.409(k)(1)-(6)

The City shall submit an annual assessment monitoring report within 60 days after the facility's second semiannual groundwater monitoring event that includes the following information determined since the previously submitted report:

- a statement whether an statistically significant level above the established groundwater protection standard has occurred in any groundwater monitor well during the previous calendar year period and the status of any statistically significant level events;
- the results of all groundwater monitoring, testing, and analytical work obtained or prepared in accordance with the requirements of this GWSAP, including a summary of background groundwater quality values, groundwater monitoring analyses, statistical calculations, graphs, and drawings;
- the groundwater flow rate and direction in the uppermost aquifer. The groundwater flow rate and direction of groundwater flow shall be established using the data collected during the preceding calendar year's sampling events from the monitoring wells of the Assessment Monitoring Program. The City shall also include in the report all documentation used to determine the groundwater flow rate and direction of groundwater flow;
- a contour map of piezometric water levels in the uppermost aquifer based, at a minimum, upon concurrent measurement in all groundwater monitor wells. All data or documentation used to establish the contour map should be included in the report;
- recommendation for any changes; and
- any other items requested by the TCEQ such as a description of any special wastes previously handled at the facility.

In addition, the City will submit a laboratory case narrative and a laboratory checklist with all analysis submitted to the TCEQ. An example laboratory review checklist and exception report is included in Appendix D. In place of the laboratory checklist, the facility may submit a copy of the laboratory QA/QC and analytical data. The facility may explain any problems encountered in the laboratory analysis, either by adding additional explanations to the checklist or by extending the laboratory case narrative. Any



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 6

# LANDFILL GAS MANAGEMENT PLAN

EDINBURG REGIONAL DISPOSAL FACILITY

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

**INTENDED FOR PERMITTING  
PURPOSES ONLY**

July 2017  
Revised: November 2017

Project No. 1401491



Gas Probe ID	Site Grid Northing <sup>1</sup>	Site Grid Easting <sup>1</sup>	Seasonal Low Groundwater Elevation <sup>2</sup> (ft-msl)	Comments
GP-108	3,272	3,180	68.4	Proposed to be Installed
GP-109	3,824	3,180	68.1	Proposed to be Installed
GP-110	4,076	3,524	67.7	Proposed to be Installed
GP-111	4,076	4,105	67.4	Proposed to be Installed
GP-112	4,078	4,694	66.7	Proposed to be Installed
GP-113	4,079	5,279	63.9	Proposed to be Installed
GP-114	4,080	5,864	61.0	Proposed to be Installed
GP-115	3,800	6,284	59.6	Proposed to be Installed
GP-116	3,302	6,379	60.3	Proposed to be Installed
GP-117	2,695	6,497	61.2	Proposed to be Installed
GP-118	2,130	6,607	62.6	Proposed to be Installed
GP-119	1,955	7,028	61.2	Proposed to be Installed
GP-120	1,396	7,132	63.7	Proposed to be Installed
GP-121	814	7,239	66.4	Proposed to be Installed
GP-122	224	7,350	67.9	Proposed to be Installed
GP-123	18	6,841	68.7	Proposed to be Installed
GP-124	18	6,261	68.4	Proposed to be Installed
GP-125	18	5,676	68.2	Proposed to be Installed
GP-126	18	5,091	68.6	Proposed to be Installed
<u>GP-32</u>	<u>2050</u>	<u>486</u>	<u>67.7</u>	<u>Existing to be Abandoned</u>
<u>GP-33</u>	<u>2050</u>	<u>882</u>	<u>67.6</u>	<u>Existing to be Abandoned</u>
<u>GP-18</u>	<u>2048</u>	<u>1408</u>	<u>67.3</u>	<u>Existing to be Abandoned</u>
<u>GP-19R</u>	<u>2038</u>	<u>2045</u>	<u>66.5</u>	<u>Existing to be Abandoned</u>
<u>GP-36</u>	<u>2059</u>	<u>2612</u>	<u>66.1</u>	<u>Existing to be Abandoned</u>
<u>GP-37</u>	<u>2057</u>	<u>3153</u>	<u>67.4</u>	<u>Existing to be Abandoned</u>
<u>GP-38</u>	<u>2057</u>	<u>3692</u>	<u>67.8</u>	<u>Existing to be Abandoned</u>

Notes:

1. Locations provided are approximate.
2. Seasonal low groundwater elevations determined from groundwater level data collected in Part III4E, Historical Groundwater Elevations.

**2.1.1.1 Monitoring Probe Installation**

Borings for monitoring probes will be performed by drillers registered in the State of Texas, drilled with a hollow-stem auger and sampled with a split-tube sampler, logged, and supervised by either a qualified professional geologist or a registered professional engineer.

These monitoring probes, fabricated of 1- to 2-inch diameter polyvinyl chloride (PVC) material, will be constructed with a solid riser pipe that extends from approximately 3 feet above ground level to approximately 5 feet below ground level and a screened section extending to the final depth. The annular space will be filled with sand or pea gravel approximately 6 inches above the screened section, topped with

Although this pipeline does not cross the facility boundary, utility trench gas vents will be installed at the west and east corners of southern facility boundary for monitoring, GV-8 and GV-9, respectively.

### **2.1.3 Enclosed Facility Structures**

30 TAC §330.371(i)

No enclosed on-site facility structures are located within the facility's property boundary that have a potential for LFG migration to accumulate – the closest enclosed structure to the facility is a maintenance building located approximately 1,050 ft south of the permit boundary. Any existing on-site mobile structures are elevated above the existing ground and adequately vented below; therefore, eliminating the potential for LFG migration to accumulate.

## **2.2 Monitoring Frequency**

30 TAC §§330.371(b)(2), 330.371(d), 330.371(j), 330.371(k)(1) & 330.371(k)(2)

The minimum frequency of methane monitoring shall be quarterly for the operating life of the landfill and the post-closure care period, unless directed otherwise by the executive director of the Texas Commission on Environmental Quality (TCEQ). All monitoring probes and any on-site enclosed structures shall be sampled for methane during the monitoring period. Sampling for specified trace gases may be required by the TCEQ when there is a possibility of acute or chronic exposure due to carcinogenic or toxic compounds. The TCEQ may require more frequent monitoring upon notification and may establish alternative schedules for demonstrating compliance with 30 TAC §330.371(b). The City of Edinburg (City) shall monitor more frequently those locations where monitoring results indicate that landfill gas migration is occurring or is accumulating in structures.

## **2.3 Sampling Methods**

### **2.3.1 Monitoring Probes and Utility Trench Gas Vents**

Methane monitoring during landfill operations will be performed using portable equipment. A hand-held Landtec GA-90 Infra-Red Gas Analyzer, a Landtec Gem 2000, or a similar instrument, which is capable of measuring methane gas concentrations in an oxygen deficient environment, may be used to measure methane gas concentrations at the site. Prior to sampling, calibration of the methane monitoring equipment will be verified using standard calibration gas. The type of gas monitoring equipment utilized at the facility will vary over the operational life and post-closure periods; therefore, manufacturers' specifications are not included with this plan. Monitoring data collected will be recorded on the typical form provided in [Part Appendix III6A](#), Example Gas Monitoring Data Form.

### **2.3.2 Enclosed Facility Structures**

As discussed in §2.1.3, there are no enclosed on-site facility structures located within the facility's property boundary. However if any enclosed facility structures are constructed having a potential for LFG migration to accumulate; they will be monitored with either a portable equipment or a stationary continuous combustible gas monitor, which activates an audible alarm when preset combustible gas concentrations are exceeded. If the alarms are used, they will be calibrated to detect methane concentrations below 1.25 percent by volume and will be maintained and tested in accordance with the manufacturer's recommendations.

## **2.4 Contingency Plan**

30 TAC §330.371(c)-(1)

If confirmed methane gas detection levels exceeding 1.25 percent by volume in facility structures (excluding gas control or recovery system components); and/or 5 percent by volume in monitoring points, probes, subsurface soils, or other matrices at the facility boundary; the City shall immediately take all necessary steps to ensure protection of human health and notify the TCEQ, local and county officials, emergency officials, and the public.

### **2.4.1 Action for Enclosed Facility Structures**

If methane gas levels exceeding 1.25 percent by volume has been detected in enclosed facility structures (excluding gas control or recovery system components), the structure will be immediately evacuated and the Site Manager (SM), or other appropriate personnel, will be notified. Personnel (except for monitoring personnel) will not be allowed to re-enter the affected enclosed structure until a determination of the structure's safety is completed.

### **2.4.2 Action for Perimeter Monitoring at the Facility Boundary**

If methane gas levels exceeding 5 percent by volume has been detected at the perimeter points, probes, subsurface soils, or other matrices at the facility boundary as defined in §3.1.1, Monitoring Probes of this LFGMP, the SM, or other appropriate personnel, will be notified immediately. The immediate emergency response measure will be for the SM, or other appropriate personnel, to determine if nearby enclosed structures are at risk and if evacuation of the enclosed structures is necessary.

### **2.4.3 Notification Procedures**

Upon detection of methane gas exceedance, the executive director of the TCEQ, the TCEQ Region 15 office, local and county officials, emergency officials, and the public shall be notified by phone call, voicemail, email, or facsimile.

### 2.4.5 Recording

30 TAC §330.371(c)(2)

Within seven days of detection, the City will place in the site operating record the concentration of methane gas levels detected and a description of the steps taken to protect human health. If the source of methane gas detection is determined to be other than LFG migration, the City shall submit to the TCEQ a detailed evaluation identifying the source and corrective measures.

### 2.4.6 Landfill Gas Remediation Plan

30 TAC §330.371(c)(3) & §330.371(d)

If the source of methane gas releases determined to be LFG migration, the City shall implement **Part Appendix III6B**, Landfill Gas Remediation Plan (LFGRP) within 60 days of detection, place a copy of the plan in the site operating record, provide a copy to the TCEQ, and notify the TCEQ that the plan has been implemented. The notification shall describe the nature and extent of the problem and the proposed remedy. After review, the executive director may require additional remedial measures and may establish alternative schedules for demonstrating compliance with 30 TAC §330.371(c).

If modifications to the LFGRP are required for effective remediation, a revised LFGRP shall be submitted to the TCEQ as a permit modification pursuant to 30 TAC §305.70. The modification may propose a variety of changes to the site operations, and depending on the nature of the remedial action, different provisions of the §305.70 modification rule may apply. The City shall implement the modified LFGRP for methane gas releases within 60 days of detection and should not wait until the permit modification is issued.

## 3.0 LANDFILL GAS MANAGEMENT AND CONTROL PLAN

30 TAC §330.371(g)-(1)

The potential for LFG migration is affected by pressure gradients caused by LFG generation and existing site conditions discussed in §1.1, Site Conditions of this LFGMP. Porous soils such as sand and gravel allow greater lateral gas migration than finer grained soils such as clay. Waste disposal units are engineered with a lining and cover system and a gas collection and control system (GCCS) that mitigate the potential for LFG migration.

The facility has constructed an approved GCCS, depicted in Figure III6-3, Existing Landfill Gas Collection and Control System designed to actively extract LFG from within the waste for control of odor and LFG migration and for compliance with federal and state air quality regulations. The GCCS consists of vertical and horizontal gas extraction wells installed within waste over constructed disposal areas. Each gas extraction well is connected to lateral piping that convey gas flow to larger header piping around the



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 7

# CLOSURE PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



The erosion layer shall be composed of no less than two feet of soil where the first 18 inches shall be of clayey soil and the uppermost 6 inches shall be of suitable topsoil that is capable of sustaining native plant growth and shall be seeded or sodded immediately following the application of the final cover in order to minimize erosion.

Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer shall be installed top of the geomembrane to prevent the buildup of excess pore water pressure at the on the geomembrane interface. Calculations are provided in Part III, Waste Management Unit Design Report.

A 40-mil linear low-density polyethylene (LLDPE) textured geomembrane that has a permeability less than or equal to the permeability of any bottom liner system shall be installed on top of an 18-inch thick compacted clay rich earthen material with a hydraulic conductivity of  $1 \times 10^{-5}$  cm/sec or less. The thickness of the 40-mil LLDPE textured geomembrane is of adequate thickness to ensure proper seaming.

### 1.2.2 Alternative Composite System

30 TAC §330.457(d)

The alternative composite final cover varies from the conventional composite system by substituting a ~~geocomposite~~ geosynthetic clay liner for the 18-inch thick compacted clay rich earthen material and will consist of the following from top to bottom:

- Erosion layer consisting of 24 inches of protective soil cover, of which the uppermost 6 inches will be capable of supporting native vegetation.
- Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer.
- 40-mil linear low-density polyethylene (LLDPE) textured geomembrane that has a permeability less than or equal to the permeability of the bottom liner system.
- Geosynthetic Clay Liner.

Figure III7-3B, Alternative Composite Final Cover Details includes final cover and drainage feature installation details.

Appendix III7A, Alternative Composite Final Cover Demonstration shows that use of geosynthetic clay liner achieves a greater or equal to reduction in infiltration in comparison to 18-inch thick compacted clay rich earthen material.

### 1.2.3 Alternative Synthetic Grass System

30 TAC §330.457(d)

The alternative synthetic grass final cover will consist of the following from top to bottom:

- HDPE synthetic grass

- Sand infill
- Woven geotextile filter backing
- 50-mil linear low density polyethylene (LLDPE) Super Gripnet® geomembrane with integrated drainage layer

Figure III7-3C, Alternative Synthetic Grass Final Cover Details includes final cover and drainage feature installation details.

Appendix III7B, Alternative Synthetic Grass Final Cover Demonstration shows that ClosureTurf® provides a level of infiltration reduction and wind and water protection that is greater than or equal to the level of protection provided by the standard composite final cover system. In addition, the ClosureTurf® offers other advantages over the standard composite final cover system.

## 2.0 CLOSURE

Waste disposal areas designated as units in this application do not have discrete individual final cover systems but share one final cover; therefore, for the purposes of closure, they will be collectively referred to as the MSW landfill unit. Final cover installation will be done in installments as ~~each~~ areas of a the MSW landfill unit ~~or units~~ attain permitted elevation. Part II, Facility Layout of this application describes the anticipated schedule of development for the facility ~~where landfill units may be incrementally constructed wholly or partially in any sequence for operational feasibility.~~ Figures II-20 – II-25, Operational Sequence I – VI show areas of final cover placement as waste is filled to permitted elevation.

### 2.1 Maximum Closure Area

30 TAC §330.457(e)(2)

Based on the Figure II-20A, Operational Fill Sequence I of site development discussed in Part II, Facility Layout of this application, the maximum closure area or estimate of the largest area of the MSW landfill ~~facility-unit~~ ever requiring final cover at any time during the active life is approximately 159.1 acres. Figure III7-4, Maximum Closure Area includes the active face and areas with daily or intermediate cover in place.

### 2.2 Maximum Inventory of Wastes

30 TAC §330.457(e)(3)

The maximum inventory of waste ever on-site over the active life of the facility is both the capacity of ~~the of the facility's waste disposal units~~ MSW landfill unit and storage or processing ~~units~~ areas. Waste in storage or processing ~~units~~ areas at final facility closure will either be disposed in the landfill or transported to an authorized facility, therefore the maximum inventory of waste is the capacity of the ~~combined waste disposal units~~ MSW landfill unit.

### 2.2.1 Facility Units

The maximum inventory of waste ever on-site over the active life of the facility is 87,301,156 cubic yards as demonstrated~~included~~ in Part III3A-1, Volume Calculations of this application. The volume represents the total volume available for in-place solid waste and daily and intermediate cover soils. Wastes accepted for disposal in accordance with Part II, Waste Acceptance Plan are typically compacted in place at the working face as they are received.

### 2.2.2 Storage or Processing Units Areas

Waste in storage or processing units-areas at final facility closure will either be disposed in the landfill or transported to an authorized facility. Closure for the storage and processing units-areas at the site is addressed as follows:

- Mulch area: Brush will be mulched used for erosion control applications.
- Liquid waste stabilization area: Upon closure, the waste remaining in the stabilization basin will be properly stabilized and disposed of in the landfill. The stabilization basin will be disposed of within the landfill.
- Whole tire staging area: At time of closure, tires in the staging area will be processed by grinding or other means to reduce size to quartered or split and disposed of in the landfill or another authorized facility.
- Large Item/White Goods Storage Area: Large items/white goods stored on-site at time of closure will be either transported offsite for recycling or disposed of at an authorized facility.
- Reusable materials staging area: Reusable materials will transported off-site for to reusable material end user locations.

## 2.3 MSW Landfill Unit Closure Implementation

30 TAC §330.457(e)(4)

A schedule for completing all activities necessary to satisfy the closure criteria for the MSW landfill unit ~~a waste disposal unit~~ is as follows in accordance with 30 TAC §330.457(f). The closure process will follow the procedures listed in Appendix III7C, TCEQ Closure Plan Form.

### 2.3.1 Closure Plan Placed in Operating Record by Initial Receipt of Waste

30 TAC §330.457(f)(1)

Because waste is currently received by the facility under TCEQ Permit MSW-956B, the City shall place a copy of this closure plan in the operating record upon issuance of TCEQ Permit MSW-956C.

### 2.3.2 Closure Notice to TCEQ

30 TAC §330.457(f)(2)

No later than 45 days prior to the initiation of closure activities for ~~thean~~ MSW landfill unit, the City shall provide written notification to the TCEQ of the intent to close the unit and place this notice of intent in the operating record.

### **2.3.3 Begin Closure Activities**

30 TAC §330.457(f)(3)

The City shall begin closure activities for ~~each-the MSW landfill~~ unit no later than 30 days after the date on which the unit receives the known final receipt of wastes or, if the unit has remaining capacity and there is a reasonable likelihood that the unit will receive additional wastes, no later than one year after the most recent receipt of wastes. A request for an extension beyond the one-year deadline for the initiation of closure may be submitted to the TCEQ for review and approval and shall include all applicable documentation necessary to demonstrate that the unit has the capacity to receive additional waste and that the City has taken and will continue to take all steps necessary to prevent threats to human health and the environment from the MSW landfill unit.

### **2.3.4 Complete Closure Activities**

30 TAC §330.457(f)(4)

The City shall complete closure activities for the MSW landfill unit within 180 days following the initiation of closure activities. These activities include placing all the final cover components to design grades and elevations over the waste mass utilizing methods, procedures, and specifications described in the Final Cover Quality Control Plan and installation of any outstanding or replacement of any damaged post-closure monitoring devices such as monitoring wells, gas probes, and the gas collection system. A request for an extension for the completion of closure activities may be submitted to the TCEQ for review and approval and shall include all applicable documentation necessary to demonstrate that closure will, of necessity, take longer than 180 days and all steps have been taken and will continue to be taken to prevent threats to human health and the environment from the unclosed MSW landfill unit.

### **2.3.5 Following Completion of Closure Activities**

30 TAC §330.457(f)(5)

Following completion of all closure activities for the MSW landfill unit, the City shall comply with the post-closure care requirements specified in Part III8, Post-Closure Plan. The City shall submit to the TCEQ by registered mail for review and approval a certification, signed by an independent licensed professional engineer, verifying that closure has been completed in accordance with this closure plan. The submittal to the executive director shall include all applicable documentation necessary for certification of closure. Once approved, this certification shall be placed in the operating record.

facility of the date of closing for the entire facility and the prohibition against further receipt of waste materials after the stated date.

#### **2.4.4 Access Barriers**

30 TAC §330.461(b)

Upon written notification to the TCEQ, suitable barriers shall be installed at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

#### **2.4.5 Deed Recordation**

30 TAC §330.457(g) & §330.461(c)(1)

Within ten days after closure of ~~all the~~ MSW landfill units, the City shall submit to the TCEQ by registered mail a certified copy of an "affidavit to the public" in accordance with the requirements of 30 TAC §330.19, Deed Recordation and place a copy of the affidavit in the operating record. In addition, the City shall record a certified notation of the deed to the facility property, or on some other instrument that is normally examined during title search, that will in perpetuity notify any potential purchaser of the property that the land has been used as a landfill facility and use of the land is restricted according to the provisions specified in 30 TAC §330.465 Certification of Post-Closure Care. The City shall submit a certified copy of the modified deed to the TCEQ and place a copy of the modified deed in the operating record.

#### **2.4.6 Certification**

30 TAC §330.461(c)(2)

Within ten days after completion of final closure activities, a certification, signed by an independent licensed professional engineer, verifying that final facility closure has been completed in accordance with this closure plan. The submittal to the TCEQ shall include all applicable documentation necessary for certification of final facility closure. Once approved, the certification will be placed in the site's operating record.

Following receipt of the required final closure documents and an inspection report from the TCEQ's regional office verifying proper closure of the facility according to this closure plan, the TCEQ may acknowledge the termination of operation and closure of the facility and deem it properly closed. Post-closure care maintenance will begin immediately upon the date of final closure as approved by the TCEQ. All post-closure land use will comply with 30 TAC §330.463, as indicated in the Post-Closure

Plan. Appendix III7C, TCEQ Closure Plan Form, provides guidance to detail the plan for closure of a landfill unit, closure of associated storage or processing units/areas, and final closure of the facility to meet the requirements in 30 TAC Chapter 330, §330.63(h) and 30 TAC Chapter 330 Subchapter K for a MSW Type I facility.

### **3.0 FINAL COVER QUALITY CONTROL PLAN**

30 TAC §330.457(c)

Appendix III7D, Final Cover Quality Control Plan (FCQCP) describes the final cover system design, construction, and evaluation protocol and processes, including the personnel, materials, methods, sampling and testing standards, procedures, and practices to be used in procuring, handling, installing, and evaluating all elements of the final cover system. It establishes the material requirements; personnel qualifications and roles; installation requirements; quality control and quality assurance monitoring, testing, documentation, and reporting programs to be used during construction of each component of the final cover system to assure and to verify that the final cover system is constructed as designed and in accordance with applicable rules and technical standards. The alternative synthetic grass final cover differs considerably from the conventional composite final cover and the alternative composite final cover, therefore a separate FCQCP has been prepared.

- Appendix III7D-1 – Conventional Composite and Alternative Composite Final Cover Systems.
- Appendix III7D-2 – Alternative Synthetic Grass Final Cover System.

**APPENDIX III7A**

**ALTERNATIVE COMPOSITE FINAL COVER DEMONSTRATION**



PERMIT AMENDMENT APPLICATION  
— Part III, Attachment 7, Appendix A

## PART III, ATTACHMENT 7, APPENDIX A

# ALTERNATE COMPOSITE FINAL COVER DESIGN DEMONSTRATION

**Edinburg Regional Disposal Facility**

**Edinburg, Hidalgo County, Texas**

**TCEQ Permit MSW-956C**

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

**July 2017**  
**Revised: November 2017**

**Project No. 1401491**



## 1.0 INTRODUCTION

This alternative composite final cover design demonstration will demonstrate that the use of geosynthetic clay liner (GCL) will provide equivalent infiltration and protection from wind and water erosion as the conventional composite final cover defined in 30 TAC §330.457(a).

### 1.1 Alternative Composite Liner System

The alternative composite final cover system is summarized in below.

<b>GCL <del>Alternate</del>-<u>Alternative</u> Final Cover System</b>
<b>Sideslopes</b>
24-inch thick erosion layer
Double-sided geocomposite drainage layer
40-mil LLDPE textured geomembrane
GCL

GCLs are geocomposite materials of low hydraulic conductivity used frequently in liner systems. Several manufacturers produce GCLs with varying characteristics. In general, GCLs are manufactured by placing powdered or granulated bentonite on a geotextile or geomembrane substrate. The bentonite layer is typically 7 to 10 mm thick (following hydration) and is placed at a unit weight of approximately 0.8 pounds per square feet (lb/ft<sup>2</sup>). The GCLs with a geotextile substrate also have a covering geotextile, which is often needle-punched, connecting the underlying geotextile to increase the structural integrity. Non-woven and woven geotextiles of various weights are used.

Typically, the permeability of the bentonite component of GCLs ranges from less than  $1 \times 10^{-9}$  to  $5 \times 10^{-9}$  cm/sec.

## 2.0 EQUIVALENCY

### 2.1 Leakage Rate Estimates

The leakage through composite liners can be estimated using the “Giroud equation”, presented in Giroud et al, 1997. The method requires several assumptions regarding the characteristics of the composite liner. First, it is assumed that permeation through the full area of the geomembrane is insignificant in comparison to rapid leakage through isolated defects or holes. It is also necessary to make assumptions regarding the extent to which intimate contact has been achieved. A composite liner that possesses intimate contact has been constructed such that the geomembrane lies flush with the surface of the underlying clay component, with few or no gaps between the two liners. When intimate contact has been

achieved, the effective area of leakage is very small, and the total liner system leakage is minimized. This phenomenon is referred to as “composite action.”

The equation used in the analysis is derived both from theoretical models of fluid flow and from empirical analyses of actual composite liner systems. Flow through a circular defect in a composite liner is calculated as:

$$Q = C[1+0.1(h/t_s)^{0.95}]a^{0.1}h^{0.9}k_s^{0.74}$$

where:

- Q = rate of leakage through a defect (m<sup>3</sup>/sec)
- C = Dimensionless constant related to the quality of the intimate contact between the geomembrane and the underlying soil component
- h = hydraulic head on the geomembrane (m)
- t<sub>s</sub> = thickness of the low-permeability soil component (i.e., the CCL or GCL) (m)
- a = area of geomembrane defect (m<sup>2</sup>)
- k<sub>s</sub> = permeability of soil component (i.e., CCL or GCL) (m/s)

Using the above equation, the conventional composite final cover system was compared to the alternative composite final cover system for both “good” and “poor” intimate contact and for circular holes with an area of 0.1 and 1.0 cm<sup>2</sup>.

As shown on the calculations in Appendix III7AA, [Infiltration Rate Comparison – GCL Alternate Final Cover](#) for each condition, the alternative composite final cover had calculated leakage rates approximately 1/250<sup>th</sup> that of the geomembrane/compacted clay liner system.

## 2.2 Wind And Water Erosion

The alternative composite final cover surface will be seeded or sodded.

## 3.0 SUMMARY

Based on this analysis, it is apparent that substituting a GCL for an 18-inch thick compacted clay rich earthen material with a hydraulic conductivity of 1x10<sup>-5</sup> cm/sec provides a level of infiltration reduction and wind and water protection that is greater than or equal to the level of protection provided by the conventional composite final cover system.

**APPENDIX III7AA**

**INFILTRATION RATE COMPARISON – GCL ALTERNATE FINAL COVER**



## INFILTRATION RATE COMPARISON - GCL ALTERNATE FINAL COVER

Made By: JBF  
Checked by: CEI  
Reviewed by: MX

### OBJECTIVE

Compare the infiltration rate through a conventional composite final cover system with the infiltration rate through the alternative composite final cover system.

### GIVEN

The conventional composite final cover system consists of a 40-mil geomembrane overlying a 18-inch thick compacted clay rich material with a maximum hydraulic conductivity of  $1 \times 10^{-5}$  cm/s.

In the alternative composite final cover system, the compacted clay rich (the infiltration layer) material will be replaced with a geosynthetic clay liner (GCL). Both final covers include a geocomposite drainage layer above the geomembrane.

#### Infiltration Layer Properties

$k = 1.00E-05$  cm/s  
 $t = 1.5$  ft  
 $h = 0.2$  inches  
sized to prevent head > 0.2 inches when cover soil saturated)

#### GCL Properties

$k = 5.00E-09$  cm/s  
 $t = 7$  mm  
 $h = 0.2$  inches  
(geocomposite drainage layer sized to prevent head > 0.2 inches when cover soil saturated)

### METHOD

Estimate the infiltration rate through each final cover system using the Giroud Equation (Ref. 1). Compare the infiltration rate through composite final cover systems consisting of a geomembrane/clay rich material and a geomembrane/GCL.

Infiltration through composite geomembrane/GCL liner.

$$Q = C[1+0.1(h/t_s)^{0.95}]a^{0.1}h^{0.9}k_s^{0.74} \quad \text{Ref 1}$$

where:

$C = 0.21$  for good contact  
 $1.15$  for poor contact

$h =$  head (m)

$t_s =$  thickness of low permeability soil component (i.e. CCL or GCL) (m)

$a =$  area of hole ( $m^2$ )

$k_s =$  hydraulic conductivity of CCL or GCL (m/s)

## RESULTS

### Leakage Rate Per Defect

Intimate Contact		Good		Poor	
Composite Cover System		GM/Clay	GM/GCL	GM/Clay	GM/GCL
Leakage (m <sup>3</sup> /sec)	0.1 cm <sup>2</sup> hole	3.79E-09	1.46E-11	2.07E-08	8.02E-11
	1 cm <sup>2</sup> hole	4.77E-09	1.84E-11	2.61E-08	1.01E-10

### Comparison

Intimate Contact	$Q_{GM/Clay}/Q_{GM/GCL}$	
	0.1 cm <sup>2</sup> hole	1 cm <sup>2</sup> hole
Good	259	259
Poor	259	259

## CONCLUSION

Based on this analysis, the infiltration rate through an alternative composite final cover system with a GCL will be approximately 1/250th that of the conventional composite final system with a clay rich infiltration layer.

## REFERENCE

- 1) Giroud, J.P., "Equations for Calculating the Rate of Liquid Migration Through Composite Liners Due to Geomembrane Defects", Geosynthetics International, Vol. 4, Nos. 3-4, pp. 335-348, 1997.

**APPENDIX III7C  
TCEQ CLOSURE PLAN FORM**



# Texas Commission on Environmental Quality

## Closure Plan for Municipal Solid Waste Type I Landfill Units and Final Facility Closure

This form is for use by applicants or site operators of Municipal Solid Waste (MSW) Type I landfills to detail the plan for closure of a landfill unit, closure of associated storage or processing units, and final closure of the facility to meet the requirements in 30 TAC Chapter 330, §330.63(h) and 30 TAC Chapter 330 Subchapter K for a MSW Type I facility.

If you need assistance in completing this form, please contact the MSW Permits Section in the Waste Permits Division at (512) 239-2335.

### I. General Information

Facility Name: Edinburg Regional Disposal Facility

MSW Permit No.: MSW-956C

Site Operator/Permittee Name: City of Edinburg

### II. Landfill and Other Waste Management Units and Operations Requiring Closure at the Facility

#### A. Facility Units

Table 1. Description of the Landfill Units. *(Note the contiguous waste disposal areas designated as units in this application collectively share one final cover system and comprise a single landfill unit)*

Name or Descriptor of Unit	Operating Status of Unit	Type of Liner System Under Unit	Above Grade Class 1 Disposal Cells in this Unit	Below Grade Class 1 Disposal Cells in this Unit	Other Class 1 Disposal Cells in this Unit (describe)	Size of Unit's Waste Footprint (acres)	Maximum Inventory of Waste Ever in Unit (cubic yards)	Other Necessary Information that Pertains to the Unit
Pre-Subtitle D Units 1 - 4	Inactive	None Few cells have GM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	29.2	1,027,858	Final cover soil in place. Certification not found.
Unit 5	Active	Alternative liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	52.9	3,723,273	
Unit 6	Active	Alternative liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	110.8	11,983,781	
Unit 7 and Unit 8 / Overliner	Construction following permit issuance	Alternative liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	213.1	70,566,243	Unit 8 or Overliner option to be constructed
Totals						406.0	87,301,156	

**Closure Plan for Type I Landfill Unit and Facility**

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Table 2. Description of Waste Storage or Processing Units-Areas or Operations Associated with this Permit.

Type of Storage or Processing Unit or Operation (individual units may be closed at any time prior to or during the final facility closure as described in this plan)	Operational Status of Unit	Size of the Area Used for the Storage or Processing Unit or Operation (Acres)	Maximum Inventory of Waste Ever in Storage or Processing Unit or Operation (indicate cubic yards or tons)	Other Information (enter other necessary information that pertains to the unit)
Mulching	Active	1.0	4,000 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	<i>Waste in storage or processing <u>units-areas</u> will either be disposed in the landfill or transported to an authorized facility. Therefore inventory of waste in storage or processing <u>units-areas</u> or operations is included in capacity of <u>the landfill units</u>.</i>
Liquid Stabilization	Operational following permit issuance	0.04	400 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	
Reusable Materials	Active	0.02	200 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	
Whole Tire Staging	Active	0.004	40 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	
Totals		1.064	4,640	

**B. Waste Inventory Summary**

Table 3. Maximum Inventory of Wastes Ever On Site.

Item	Quantity (indicate cubic yards or tons)
Maximum inventory of waste in landfill units (total from Table 1)	87,301,156 <input checked="" type="checkbox"/> cubic yards or <input type="checkbox"/> tons
Maximum inventory of waste in storage or processing <u>units-areas</u> or operations (total from Table 2)	0 <input checked="" type="checkbox"/> cubic yards or <input type="checkbox"/> tons <i>Waste in storage or processing units will either be disposed in the landfill or transported to an authorized facility.</i>
Total Maximum Inventory of Wastes ever on site over the active life of the MSW facility (sum of totals from Tables 1 and 2)	87,301,156 <input checked="" type="checkbox"/> cubic yards or <input type="checkbox"/> tons

**Closure Plan for Type I Landfill Unit and Facility**

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**C. Drawings Showing Details of the Waste Management Units at Closure**

*Table 4. Location of the Drawings showing Details of the Waste Management Units at Closure (outlines, dimensions, maximum elevations of waste and final cover of landfill units, and waste storage or processing ~~units~~ areas or operations at closure of the facility).*

Drawing Location in the SDP	Drawing Figure Number	Drawing Title	Waste Management Units Details Shown
Part III, Attachment 3	III3-1	Facility Layout Plan	<del>e.g., outline, waste footprint, and dimensions of the landfill unit</del> e.g., outlines, waste footprints, and dimensions of the landfill unit(s)
Part III, Attachment 7	III7-1	Final Contour Map	<del>e.g., maximum elevations of waste and final cover of the landfill unit</del> e.g., maximum elevations of waste and final cover of the landfill unit(s)
Part III, Attachment 1	III1-2	Schematic View of Various Waste Disposal, Processing, and Storage Areas	<del>e.g., outlines and dimensions of the storage and processing area(s)</del> e.g., outlines and dimensions of the storage and processing unit(s)

**III. Description of the Final Cover System Design**

**A. Types and Descriptions of the Final Cover Systems**

*Table 5. Types and Descriptions of the Final Cover Systems Permitted or Proposed for Closure of the Landfill Units.*

Landfill Unit Name or Descriptor	Type of Final Cover System	Final Cover System Components Description	Other Information (Enter other information as applicable)
<del>All Units</del> No-certified final cover.	Conventional Composite	24-inch erosion layer with upper 6 inches capable of supporting vegetation, double-side geocomposite, 40-mil LLDPE, 18-inch compacted clay 1x10 <sup>-5</sup> cm/s	Three final cover system options are provided for closure <del>for</del>
	Alternative Composite	24-inch erosion layer with upper 6 inches capable of supporting vegetation, double-side geocomposite, 40-mil LLDPE, geosynthetic clay liner	

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Landfill Unit Name or Descriptor	Type of Final Cover System	Final Cover System Components Description	Other Information (Enter other information as applicable)
	Alternative Synthetic Grass	HDPE synthetic grass, sand infill, geotextile, 50-mil LLDPE Super Gripnet® geomembrane	<i>areas in all units.</i>

**B. Design Details**

*Table 6. Design Details of the Final Cover Top and Side Slopes for the Landfill Units.*

Landfill Unit Name or Descriptor	Maximum Final Elevation of Waste (feet above mean sea level [ft-msl])	Maximum Elevation of Top of Final Cover (ft-msl)	Minimum Grade of the Final Cover Top Slope (%)	Maximum Grade of the Final Cover Side Slope (%)	Other Information (enter other information as applicable, e.g. above-grade Class 1 Cell Dikes)
<b>All Units</b> Conventional Composite Option	394.5	398.0	5	25	<i>Three final cover system options are provided for closure <del>for all</del> units. Final cover grades are not to exceed those in Figure III-1, Final Contour Map</i>
<b>All Units</b> Alternative Composite Option	396.0	398.0	5	25	
<b>All Units</b> Alternative Synthetic Grass Option	398.0	398.0	5	25	

**C. Final Cover Drainage Features**

Storm water drainage and erosion and sediment control features incorporated on the final cover of the landfill units to protect the integrity and effectiveness of the final cover system include *(please list and describe the drainage features to be installed on the final cover at or prior to closure for each landfill unit, or list the drainage features and provide cross references on the location(s) of the descriptive and details (drawing) information in other parts of the SDP):*

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Part III2, Surface Water Drainage Report contains details on drainage features to be installed on the final cover prior to closure for each landfill unit which includes add-on berms and downchutes.

Figure III2-2 Post-Development Drainage Plan

Figure III2-3 Drainage Control Details I – Channels and Berms

Figure III2-4 Drainage Control Details II – Stormwater Downchute Details and Crossings

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### D. Final Cover Vegetation or Other Ground Cover Material

The final cover will be seeded and/or sodded with native plants immediately following the application of the final cover in order to minimize erosion. Other materials, including **mulch and geosynthetic erosion control products**, may be incorporated over the final cover soil surface to ensure sufficient coverage of the ground surface to minimize erosion. The estimated percent ground cover to minimize soil loss and maintain long-term erosional stability of the final cover top and side slopes is: ~~5% and 2590%~~. The minimum material specifications for other ground cover materials are summarized in the table below.

*For a landfill with water balance final cover design, the percentage vegetation cover (excluding other ground cover types) will not be less than that assumed in the water balance final cover model.*

Table 7. Minimum Specification for Ground Cover Materials Other Than Vegetation, if Applicable.

Other Ground Cover Material	Maximum Particle Size (inches)	Minimum Particle Size (inches)	Material Placement Method	Thickness of Layer (inches)	Percentage Coverage (%)	Other (specify)
Mulch	Varies	Varies	Spread	Varies	Varies	
Geosynthetic Erosion Control Products	NA	NA	Install	Varies	Varies	

### E. Final Contour Map

Figure III7-1, a facility final contour map is attached. The map shows the final contours of the landfill units and the entire facility at closure.

Figures III7-3A and III7-3E showing the cross-sections of the landfill units at closure are also provided.

The facility final contour and cross-section maps/drawings depict the following information:

- (1) Final constructed contours of the landfill at closure.
- (2) Top slopes and side slopes of the landfill units.
- (3) Surface drainage features.
- (4) 100-year floodplain, as applicable.
- (5) Constructed features providing protection of/from the 100-year floodplain.
- (6) Other (specify):  
N/A

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**IV. Description of the Final Cover System Installation Procedure**

**A. Mode of Installation**

*Table 8. Mode of Final Cover Installation on the Landfill Units.*

Landfill Unit Name or Descriptor	Largest Area of Unit Ever Requiring Final Cover (Acres)	Check this Column if Final Cover will be Placed in Installments as Permitted Elevation is Reached	Check this Column if Final Cover will be Placed when Entire Unit Area Reaches Permitted Elevation	Final Cover Installation Status
<del>All Units</del>	<del>253.5159.1</del>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yet to be installed
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	

**B. Installation Drawings for Final Cover and Drainage Features**

The following attached plan and cross-section drawings show the final cover design details, the largest area requiring final cover, details of the sequence of installation of the final cover system, and all drainage features.

*Table 9. List of Attached Installation Drawings for Final Cover and Drainage Features.*

Drawing No.	Drawing Title	Description of Information Contained in Drawing
III7-1	Final Contour Map	Plan drawing of final fill and drainage features
III7-2	Fill Cross-Sections	Fill Cross Section Location Map including profiles
III7-3	Final Cover Details	Details of final cover components and drainage features
III7-4	Maximum Closure Area	Area of maximum closure from sequence of site development in Part II

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### C. Final Cover Quality Control Plan

A final cover quality control plan (FCQCP), Attachment **III7D**, is attached. The FCQCP describes the final cover system design, construction, and evaluation protocol and processes, including the personnel, materials, methods, sampling and testing standards, procedures, and practices to be used in procuring, handling, installing, and evaluating all elements of the final cover system. It establishes the material requirements; personnel qualifications and roles; installation requirements; quality control and quality assurance monitoring, testing, documentation, and reporting programs to be used during construction of each component of the final cover system to assure and to verify that the final cover system is constructed as designed and in accordance with applicable rules and technical standards.

### D. Documentation and Reporting of Final Cover System Construction and Testing

The professional of record will document all aspects and stages of the final cover installation, including materials used, equipment and construction methods, and the type and rate of sampling and quality control testing performed. Following completion of construction of the final cover, the site operator/permittee will submit to the TCEQ executive director, a Final Cover System Evaluation Report (FCSER) for each landfill unit.

## V. Closure Activities and Completion Schedules for Each Landfill Unit and for the Final Facility Closure

### A. Closure of a Landfill Unit

The following activities will be conducted to satisfy the closure criteria for a landfill unit:

#### (1) Closure Notification to the TCEQ Executive Director:

The site operator will inform the executive director of the TCEQ, in writing, of the intent to close the unit no later than 45 days prior to the initiation of closure activities and place this notice of intent in the operating record.

#### (2) Stoppage of Waste Acceptance and Commencement of Other Closure Activities for the Unit:

The site operator will stop accepting waste upon receiving the known final receipt of waste. The site operator will ensure that the permitted top elevations of the in-place waste, as depicted in/derived from the unit's final contour map approved by the TCEQ executive director, are not exceeded at any section or part of the landfill unit. The site operator will begin closure activities for the unit no later than:

- Thirty days after the date on which the unit receives the known final receipt of wastes; or

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- One year after the most recent receipt of wastes if the unit has remaining capacity and there is a reasonable likelihood that the unit will receive additional wastes.

### **(3) Request for Extension Beyond the 1-Year Deadline for Commencing Closure Activities for a Unit:**

The site operator may submit a written request to the executive director of the TCEQ for review and approval for an extension beyond the one-year deadline for the initiation of closure. The request will include the following:

- (a) All applicable documentation necessary to demonstrate that the unit has the capacity to receive additional waste; and
- (b) All documentation necessary to demonstrate that the site operator has taken and will continue to take all steps necessary to prevent threats to human health and the environment from the MSW landfill unit.

### **(4) Construction of Final Cover:**

The site operator will construct the permitted final cover over the waste mass utilizing methods, procedures, and specifications described in the FCQCP. The final constructed contours, elevations, and slopes of the installed final cover will match the permitted final cover contours, elevations, and slopes shown in closure drawings contained in this closure plan.

### **(5) Construction of Drainage Features:**

The site operator will construct the drainage structures shown in drawings referenced or contained in this closure plan or in the facility surface water drainage report.

### **(6) Completion of Outstanding or Replacement of Damaged Groundwater or Landfill Gas Monitoring Components:**

The site operator will complete installation of any outstanding or replacement of any damaged groundwater or landfill gas monitoring system components and landfill gas control systems as needed to maintain current and effective groundwater or landfill gas monitoring and control systems.

### **(7) Submittal of Final Cover System Evaluation Report (FCSER) to the TCEQ Executive Director:**

Following completion of construction of the final cover for the subject landfill unit, the site operator will submit to the TCEQ executive director for review and acceptance, a FCSE for the unit.

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### **(8) Completion of Closure Activities for the Landfill Unit:**

The site operator will complete closure activities for the unit within 180 days following the start of closure activities, unless the executive director of the TCEQ grants an extension as described in Item V.A.8(a) below.

#### **(a) Request for Extension of the Completion of Closure Activities for the Landfill Unit:**

The site operator may submit a written request for an extension for the completion of closure activities to the TCEQ for review and approval. The extension request will include:

- All applicable documentation necessary to demonstrate that closure will, of necessity, take longer than 180 days; and
- All applicable documentation necessary to document that all steps have been taken and will continue to be taken to prevent threats to human health and the environment from the unclosed MSW landfill unit.

### **(9) Submittal of Engineer's Certification of Closure to the TCEQ Executive Director and Request of Closure Inspection to TCEQ Regional Office:**

Following completion of all closure activities for the landfill unit, the site operator will submit:

#### **(a) Closure Inspection**

A written request to the local TCEQ regional office for a closure inspection of the unit.

#### **(b) Closure Certification**

A certification, signed by an independent licensed professional engineer, to the executive director of the TCEQ for review and approval verifying that closure has been completed in accordance with this closure plan. The site operator will submit the certification via registered mail, and the submittal will contain all applicable documentation necessary for certification of closure of the unit, including:

- A final cover system evaluation report (FCSER) documenting the installation of the final cover. The FCSER may be submitted as a separate document for review and approval following the completion of the final cover installation. In that case, the certification of closure will be submitted subsequently;
- A final contour map as described under Section III.E that includes the relevant unit; and
- Copy of the letter to the TCEQ regional office requesting a closure inspection of the relevant unit.

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### **(10) TCEQ's Acknowledgement of Termination of Operation and Closure of a Unit:**

Upon receipt, the TCEQ executive director will review the closure documents for completeness and accuracy; and following receipt of the closure inspection report from the agency's regional office verifying proper closure of the MSW landfill unit according to this closure plan, the executive director will, in writing, acknowledge the termination of operation and closure of the unit and deem it properly closed. Thereafter, the site operator will comply with the post-closure care requirements described in the post-closure care plan for the unit.

### **(11) Deed Recordation for Disposed Regulated Asbestos Containing Materials (RACM):**

Upon closure of the unit that accepted RACM, the site operator will place a specific notation that the unit accepted RACM in the deed records for the facility with a diagram identifying the RACM disposal areas. Concurrently, the site operator will submit to the TCEQ executive director, a notice of the deed recordation and a copy of the diagram identifying the asbestos disposal areas.

### **(12) Placement of all Closure Documentation in the Site Operating Record:**

Once approved, the closure certification and all other documentation of closure will be placed in the site operating record.

### **(13) Closure Schedule for the Landfill Unit:**

*A closure schedule for Unit Closure Implementation is provided in Closure Plan Report Text.* The schedule shows all the closure activities listed within Section V.A and the timelines for commencing and completing each activity. Also, the schedule shows that closure activities for the landfill unit will be completed within 180 days following the initiation of closure activities as required, unless an extension is granted by the TCEQ executive director.

### **(14) Other: (enter as applicable).**

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### B. Closure of the Waste Storage or Processing Units or Operations

Closure of the waste storage or processing units or operations authorized under this permit will include removal of all waste, waste residues, and any recovered materials. The facility units and operations will either be dismantled and removed off-site or decontaminated. The site operator will dispose at the landfill or evacuate all materials (including feedstock, in process, and processed) to an authorized facility and disinfect all leachate handling units, tipping areas, processing areas, and post-processing areas. If there is evidence of a release from a unit or operation, the site operator will conduct an investigation, as approved by the TCEQ executive director, into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

### C. Final Closure of the Facility

In addition to the closure activities listed in Section V.A above for closing a landfill unit, the site operator will conduct the following activities for the closure of the entire facility:

#### **(1) Publish Final Closure Notice and Place the closure Plan in a Public Place:**

No later than 90 days prior to the initiation of the final facility closure, the site operator will:

##### **(a) Publication of Notice:**

The site operator will publish notice in the newspaper(s) of largest circulation in the vicinity of the facility to inform the public of the final closure of the facility. This notice will include:

- The name of the facility;
- The address, and physical location of the facility;
- The facility's permit number; and
- The last date of intended receipt of waste.

##### **(b) Place Copies of the Closure Plan in a Public Place:**

The site operator will also make available an adequate number of copies of the approved final closure and post-closure plans for public access and review at the Edinburg City Hall, 415 West University Drive, Edinburg, Texas 78539 (state public place within the area, including address, where the plan will be available for public access and review).

#### **(2) Submit Written Notice of "Intent to Close the Facility" to the TCEQ Executive Director:**

The site operator will provide written notification to the TCEQ executive director of the intent to close the facility. This notice will be provided to the executive director no later than 90 days prior to the initiation of the final facility closure, and thereafter be placed in the site operating record.

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### **(3) Post Signs and Install Barriers:**

Upon notifying the executive director of the intent to close the facility and no later than 90 days prior to the initiation of final facility closure, the site operator will:

#### **(a) Post Final Closure Signs:**

The site operator will post a minimum of one sign at the main entrance and all other frequently used points of access for the facility notifying all persons who may utilize the facility of the date of closing for the entire facility and the prohibition against further receipt of waste materials after the stated date.

#### **(b) Install Barriers:**

Also, the site/operator will install suitable barriers at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

### **(4) Filing of "Affidavit to the Public" and Performance of the Final Deed Recording:**

Upon closure of all the landfill units or upon final closure of the facility, the site operator will:

#### **(a) File Affidavit**

File with the county deed records an "Affidavit to the Public" in a form provided by the TCEQ executive director that includes an updated metes and bounds description of the extent of the disposal areas at the facility and the restrictions to future use of the land in accordance with applicable provisions under 30 TAC Chapter 330, Subchapter T.

#### **(b) Record a Notation on the Deed**

Record a certified notation on the deed to the facility property, or on some other instrument that is normally examined during title search, that will in perpetuity notify any potential purchaser of the property that the land has been used as a landfill facility and use of the land is restricted according to the provisions under 30 TAC Chapter 330, Subchapter T.

#### **(c) Place Documents in the Operating Record**

Place a copy of the "Affidavit to the Public" and a copy of the modified deed in the site operating record.

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### **(5) Submittal of a Copy of the "Affidavit to the Public" and the "Modified Deed" to the TCEQ Executive Director:**

Within ten days after completion of final closure activities of the facility, the site operator will submit the following to the TCEQ executive director by registered mail:

- (a) A certified copy of the "Affidavit to the Public";
- (b) A certified copy of the modified deed to the facility property; and
- (c) A certification, signed by an independent licensed professional engineer, verifying that final facility closure has been completed in accordance with the approved closure plan. The submittal will contain all applicable documentation necessary for certification of final facility closure, including:
  - Final Cover System Evaluation Report (FCSER) documenting the installation of the final cover. The FCSER may be submitted earlier as a separate document for review and approval following the completion of the final cover installation. In that case, the certification of closure will be submitted subsequently;
  - A final contour map as described under Item III.G above;
  - Copy of a letter to the TCEQ regional office requesting a final closure inspection of the facility; and
  - Copies of documents verifying newspaper publication of the notice of the final facility closure.

### **(6) Other**

Additional items relating to the schedule for final facility closure, and additional closure activities specific to the final closure of this facility include:

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### **(7) TCEQ's Acceptance of Termination of Operation and Closure of a Landfill Facility:**

Following the TCEQ executive director's receipt and completion of the review of the professional engineer's certification of the completion of facility closure and the final closure documents, and receipt of the inspection report from the agency's regional office verifying proper closure of the facility according to this closure plan, the executive director will, in writing, accept the termination of operation and closure of the facility and deem it properly closed. Thereafter, the site operator will comply with the post closure care requirements described in the post closure plan for the facility.

### **(8) Final Closure Schedule for the Facility:**

The attached Closure Plan, Final Closure Schedule, provides the closure schedule for the final facility closure. It incorporates the schedule for closure of a unit as discussed in Section V.A and also shows the commencement and completion timelines for the final closure activities listed within this Section.

## **VI. Summary of Attachments**

### **A. Drawings and Maps**

The following Drawings and Maps are attached as part of this plan.

- Figure III7-1, Final Contour Map.
- Figures III7-2, Cross-Section Drawings of the Landfill Units at Closure.
- Figures III7-3, Final Cover Details.
- Other Drawings/Maps: Figure III7-4 Maximum Closure Area

### **B. Documents**

- Attachment III7A, Alternative Composite Final Cover Demonstration.
- Attachment III7B, Alternative Synthetic Grass Final Cover Demonstration.
- Attachment III7C, Form TCEQ-20720
- Attachment III7D, Final Cover Quality Control Plan (FCQCP).

### **C. Additional Items Attached (enter as applicable)**

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**VII. Professional Engineer's Statement, Seal, and Signature**

Name: Chad E. Ireland Title: Senior Project Geological Engineer

Date: November 7, 2017

Company Name: Golder Associated Inc. Firm Registration Number: F-2578

Professional Engineer's Seal

\_\_\_\_\_  
Signature

**APPENDIX III7D-1**

**CONVENTIONAL COMPOSITE AND ALTERNATE COMPOSITE FINAL COVER SYSTEMS**



PERMIT AMENDMENT APPLICATION

Part III, Attachment 7, Appendix D-1

# FINAL COVER QUALITY CONTROL PLAN

## CONVENTIONAL COMPOSITE AND ALTERNATIVE COMPOSITE FINAL COVER

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491





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

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The alternative composite final cover will consist of (from top to bottom):

- Erosion layer consisting of 24 inches of protective soil cover, of which the uppermost 6 inches will be capable of supporting native vegetation.
- Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer.
- 40-mil LLDPE textured geomembrane that has a permeability less than or equal to the permeability of the bottom liner system.
- Reinforced GCL (infiltration layer).

The construction and testing requirements for the conventional composite final cover system infiltration layer are described in §2.0, Final Cover System Components of this FCQCP. The construction and testing requirements of the GCL infiltration layer in the alternative composite final cover system is described in §3.0, Cohesive Soil Cover of this FCQCP.

### 3.0 COHESIVE SOIL COVER (INFILTRATION LAYER)

This section outlines generally acceptable construction practices and specifications and the minimum quality control testing requirements for cohesive soil covers, serving as the infiltration layer in the final cover system.

#### 3.1 Pre-construction Material Evaluation

The first step in constructing a cohesive soil cover is to pre-qualify the soil materials that are selected for final cover construction. Cohesive soil cover material may be obtained from in situ soil strata that will be excavated as the final cover is constructed or from a select borrow source. Representative samples from either source shall be subject to the minimum pre-construction testing program shown in [Table III7D-1-1, Cohesive Soil Cover Materials Pre-construction Testing Schedule](#). Each soil type shall undergo the series of tests listed in Table III7D-1-1.

**Table III7D-1-1: Cohesive Soil Cover Materials Pre-construction Testing Schedule**

TEST	METHOD USED	FREQUENCY <sup>(1)</sup>
Soil Classification	ASTM D2487	1 per soil type
Particle-Size Analysis	ASTM D422 or D1140	1 per soil type
Atterberg Limits	ASTM D4318	1 per soil type
Hydraulic Conductivity <sup>(2)</sup>	ASTM D5084 <sup>(3)</sup>	1 per soil type
Conventional Proctor Test	ASTM D698	1 per soil type
Moisture Content	ASTM D2216	1 per soil type

**NOTES:**

- (1) If either the liquid limit (LL) or plastic limit (PI) varies by more than 10 points from other samples, the soil is considered a different soil type.
- (2) Conduct this test on a remolded sample that is compacted at or less than 95% of the maximum dry density and at the optimum moisture content as determined from the conventional Proctor test or compacted at or less than 90% for modified Proctor test at one percent dry of the optimum. If pre-construction samples are compacted at higher

- or lower densities and/or respective moisture contents, then these values will govern for field control. Pre-construction tests should represent the "worst-case" condition in the field concerning hydraulic conductivity results.
- (3) Testing procedures in Appendix VII of the US Army Corps of Engineers Manual EM 1110-2-1906, November 30, 1970, Laboratory Soils Testing, may be used as an alternative method. Permeability tests will be conducted using tap water or 0.05N calcium sulfate solution as the permeant fluid. Distilled or deionized water is not acceptable.

Where soil types vary substantially and are not segregated, representative blends of those soil types anticipated to be utilized for cohesive soil cover construction should also be sampled and tested. The material tested shall comply with the following minimum material specifications:

■ Plasticity Index	≥ 15
■ Liquid Limit	≥ 30
■ Percent Passing No. 200 Sieve	≥ 30
■ Particle Size	≤ 1 inch
■ Hydraulic Conductivity	≤ 1 x 10 <sup>-5</sup> cm/sec

The Proctor moisture-density curves shall be developed for each type of soil determined suitable as cohesive soil cover material and shall be used during the construction phase as a performance reference for compaction and moisture control. ~~Rocks and stones in soil for liner construction shall be limited to no more than 1 inch in diameter and no more than 10% by weight.~~

The POR should consider the potential adverse effects on and/or inconsistencies of results due to laboratory drying procedures, as some materials may exhibit variation in results for Proctor and Atterberg limits tests. Samples should not be oven-dried nor dried back more than 2 to 3 percent below the lowest anticipated moisture content needed to develop the Proctor moisture-density relationship. The zero air voids line shall be computed and included along with the Proctor curves, indicating the specific gravity value used.

Pre-construction samples to be run for hydraulic conductivity testing shall be molded at or less than the optimum moisture content and at or less than 95 percent of the maximum dry density according to the conventional Proctor test (ASTM D698). These points should represent reasonable worst-case conditions for hydraulic conductivity results on appropriately compacted soils. If higher moisture contents or dry densities are used for the hydraulic conductivity tests, then the higher values will be used for field control during placement. However, if lower moisture or density values are used and confirmed to achieve acceptable hydraulic conductivities, field control will still be based on the minimum compaction requirements in §3.2.4, Minimum Compaction Requirements of this FCQCP. .

~~As a general rule, a~~ minimum of one series of pre-construction tests ~~should will~~ be performed on each soil type and, a general rule for every 15,000 to 20,000 cubic yards (CY) of soil to be used in cohesive soil cover construction, unless soil types are limited and easily distinguished. As soil is usually made available subsequent to excavation during final cover construction, additional pre-construction samples should be

taken and tests performed when soils vary or as soon as the initial pre-construction test results appear inappropriate or questionable. If and when the same borrow source is utilized for the soil supply of more than one final cover area, and the soil type is the same, results from previous tests may be used to supplement the pre-construction data.

### 3.2 Soil Cover Construction Specifications and Practices

The cohesive soil cover shall be constructed in accordance with the requirements included in this section. Also, certain construction practices shall be utilized as described herein when appropriate.

#### 3.2.1 Working Surface Preparation

Subgrade preparation prior to receiving final cover will include compacting the near surface waste or intermediate cover to prepare the working surface. Depressions in the surface where ponded water is observed will be prepared by removing the water and filling the depression with additional intermediate cover to maintain an adequate slope.

Stability of the working surface prior to placement of the final cover shall be determined by the POR by visual inspection to confirm that deflection and pumping characteristics are minimized and the strength of the surface material is adequate. The lines and grades shall be determined by survey methods prior to subsequent final cohesive soil cover construction.

The prepared subgrade shall be tied into the first cohesive soil cover lift in a manner deemed suitable by the POR such that the integrity of the first lift will be maintained.

#### 3.2.2 Work Area Selection and Sizing

Work areas for cohesive soil cover construction should be selected, sized, and sequenced so that work on each lift can begin and be completed in the same day. The area worked at any one time should be of such size that placement, processing, and compaction will be uniform, with minimal variation caused by weather conditions. It is critical that completed lifts be tested and covered with the next loose lift before that completed lift dries out in the sun or becomes damaged by heavy precipitation. Furthermore, the selection of size and shape of work areas shall be consistent, so that uniform construction techniques and equipment can be selected. Adequate numbers of quality control personnel will be provided to suit the pace of construction so proper monitoring and documentation is performed.

#### 3.2.3 Lift Placement and Processing

Reduction of soil clods, uniform moisture distribution, and consistent placement thickness are key elements to achieving uniform compaction of cohesive soil covers. Cohesive soil cover material shall be placed in loose lifts, generally not exceeding 8 inches after spreading and leveling and/or processing, with the

Visual observation shall include, but not be limited to, the following:

- Moisture content and distribution, particle size, and other physical properties of the soil during processing, placement, and compaction.
- Type and level of compaction effort, including roller type and weight, drum size, foot length and face area, and number of passes.
- Action of compaction equipment on soil surface (i.e., foot penetration, rolling, pumping, or shearing).
- Maximum clod size and breakdown of soil structure.
- Method of bonding lifts together and making cohesive soil cover tie-ins.
- Stones or other inclusions, which may damage overlying geosynthetic components or adversely affect compaction, lift bonding, and in-place testing/sampling.
- Areas where damage due to excess moisture, insufficient moisture, or freezing may have occurred.

### 3.3.2 Construction Testing

30 TAC §330.457(c)

During cohesive soil cover construction, the minimum testing and sampling program presented in Table III7D-1-2, Cohesive Soil Cover Construction Testing Schedule shall be conducted to determine that adequate compaction and material conformance are being achieved.

**Table III7D-1-2: Cohesive Soil Cover Construction Testing Schedule**

TEST	METHOD	MINIMUM FREQUENCY <sup>(2)(3)</sup>
Field Moisture/Density Test	ASTM D6938, D2937, or D1556	1 per 8,000 ft <sup>2</sup> , per 6-inch lift
Percent Finer Than No. 200 Sieve	ASTM D1140 or D422	1 per 100,000 ft <sup>2</sup> , per 6-inch lift
Atterberg Limits	ASTM D4318	1 per 100,000 ft <sup>2</sup> , per 6-inch lift
Hydraulic Conductivity <sup>(1)</sup>	ASTM D5084	1 per acre (evenly distributed through all lifts), per 6-inch lift

NOTES:

- (1) Testing shall be conducted on undisturbed samples. Testing procedures in Appendix VII of the US Army Corps of Engineers Manual EM 1110-2-1906, November 30, 1970, Laboratory Soils Testing, may be used as an alternative.
- (2) A voluntary increase in the number of any tests performed does not in turn require a commensurate increase in the other testing requirements to meet the above program.
- (3) A minimum of one of each of the designated tests must be conducted for each lift of cohesive soil cover regardless of surface area.

Typically, field moisture-density tests will be performed using a nuclear density gage (ASTM D6938). Other acceptable test methods include the Sand Cone Method (ASTM D1556) or Drive Cylinder Test (ASTM D2937). Questions concerning the accuracy of any single field moisture-density test shall be addressed by retesting in the same general location. Periodic checks using the various test methods may be performed

to verify the field moisture-density test results. Alternatively, field moisture-density checks may be performed using laboratory measurements of tube samples obtained adjacent to the field test locations.

~~Hydraulic conductivity tests will be performed on samples obtained with a thin-walled tube sampler. The percent finer than No. 200 sieve and, Atterberg limits, and hydraulic conductivity tests will be performed on grab samples generally obtained with a thin-walled tube sampler or on a grab sample obtained adjacent to the thin-walled tube. If more material is needed, the extra material can be obtained from cuttings at the same location.~~ These construction test samples will be obtained from the recently completed lift, taken one lift at a time, so that sample penetrations only go through one lift and do not penetrate from one lift into the next. ~~Undisturbed Hydraulic conductivity~~ samples will ~~generally~~ be sent to the geotechnical laboratory in the sampling tube, which will be properly sealed to preserve the moisture content and integrity of the sample.

### 3.3.3 Failure Repairs

#### 3.3.3.1 Field Density Testing

Sections of cohesive soils covers that do not pass either the density or moisture requirements in the field shall be reworked and retested until the section in question does pass. All field density results shall be reported in the Final Cover System Evaluation Report (FCSER), whether they indicate passing or failing values.

In the event of a failed moisture-density test, additional tests will be performed between the failed test and the nearest adjacent passing test locations. If those additional tests pass, then the area between the failed test and the additional passing tests will be reworked and retested until passing. If the additional tests fail, then additional tests will be performed halfway between the initial additional tests and the adjacent passing tests to further define the failing area. This procedure will be repeated until the failing area is defined, reworked, and retested with passing results.

#### 3.3.3.2 Laboratory Testing

~~Sections of cohesive soil cover that do not pass hydraulic conductivity testing shall be reworked and retested until the section in question does pass. All hydraulic conductivity testing results shall be reported in the Final Cover System Evaluation Report (FCSER), whether they indicate passing or failing values.~~

~~In the event of a failed hydraulic conductivity test, additional tests will be performed between the failed test and the nearest adjacent passing test locations. If those additional tests pass, then the area between the failed test and the additional passing tests will be reworked and retested until passing. If the additional tests fail, then additional tests will be performed halfway between the initial additional tests and the adjacent~~

passing tests to further define the failing area. This procedure will be repeated until the failing area is defined, reworked, and retested with passing results.

### **3.3.4 Cohesive Soil Cover Perforations**

When taking field densities and undisturbed samples, all holes dug or created in the cohesive soil cover for density probes or samples must be backfilled with bentonite or a bentonite-rich soil material. This backfill will be tamped in the hole to remove pockets of air or loose soil, and to assure a tight compact seal.

### **3.3.5 Cover Thickness Verification**

Cohesive soil cover thickness verification shall be determined by survey methods. The verification points for record purposes shall be on a grid not exceeding 10,000 square feet per grid. If the area under evaluation is less than 10,000 square feet, a minimum of two grid points is required for verification. The selected grid shall be the same for both beginning and finished elevations of the cohesive soil cover, so that minimum thicknesses can be calculated and verified.

### **3.3.6 Post-Construction Care of Cohesive Soil Cover**

The integrity of the cohesive soil cover shall be maintained by moistening to prevent the material from desiccating. Conversely, the cohesive soil cover shall be kept free of standing water. Damage caused by rain shall be repaired, and if the lift must be reworked, as determined by the POR, then appropriate retesting (including field moisture-density and permeability tests) shall be performed.

## **4.0 GEOSYNTHETIC CLAY LINER**

This section presents general procedures, quality control testing requirements, and installation procedures for the geosynthetic clay liner (GCL) used in the alternative composite final cover to replace the cohesive soil (infiltration) layer. The GCL approved for use at the site consists of sodium bentonite encapsulated between two geotextile layers, needle-punched or stitched-bonded together.

### **4.1 Pre-Installation Material Evaluation**

#### **4.1.1 Manufacturer's Quality Control Certificates**

Prior to the installation of the GCL, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. The manufacturer must provide documentation certifying the material was continuously inspected for broken needles, and is needle free. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in accordance with project-specific testing methods and subject to the minimum testing frequency shown in Table III7D-1-3, GCL OC Submittal Frequency & Material Specifications. The owner may require more frequent testing at his discretion.

The quality control testing may be performed in the manufacturing plant. The POR shall review the test results prior to accepting the GCL to ensure that the certified minimum properties meet the values presented in Table III7D-1-3, [GCL OC Submittal Frequency & Material Specifications](#).

#### 4.1.2 Conformance Testing

In addition to the manufacturer’s quality control certificates, samples of rolls of GCL will be obtained for conformance testing. The samples shall be tested by an independent third party laboratory in accordance with Table III7D-1-4, [GCL Conformance Test Schedule](#). The POR shall review the test results to ensure that they meet the values presented in Table III7D-1-3, [GCL QC Submittal Frequency & Material Specifications](#).

The POR shall compare measured shear strength values to those used in the stability analyses included in Part III3B-2E, Final Cover System Stability. If the measured interface shear strength is less than the values used in the analyses, the stability of the final cover system shall be reassessed and revised calculations shall be included in the Final Cover System Evaluation Report (FCSER).

#### 4.1.3 Shipping and Unloading

In order to prevent premature hydration, the GCL rolls shall be shipped in plastic wrapping that shall remain intact until material installation. [Rolls shall be labeled with the manufacturers name, product identification, roll and lot number, roll dimensions, weight and any other information to trace the quality assurance documentation.](#) Upon delivery of the GCL, storage and handling procedures shall be documented. The rolls will be stacked, stored [above ground, covered](#), and handled in accordance with ASTM D5888 or manufacturer’s recommendations. [If any rolls is damaged during shipping, unloading or storage or if the outer portion becomes partially hydrated, the damaged portion shall be removed before the roll is deployed.](#)

**Table III7D-1-3: GCL QC Submittal Frequency & Material Specifications**

<b>Bentonite</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Fluid Loss	max.	ml	18	ASTM D5891	1 per 50 tons or every truck or railcar
Free Swell	min.	ml	24	ASTM D5890	
<b>Geotextile</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Mass per Unit Area	—	g/cc	—	ASTM D5261	1 per 200,000 ft <sup>2</sup>
Tensile Properties:	—	lb	—	ASTM D4632	
<b>GCL Product</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Bentonite Mass	min.	lb/ft <sup>2</sup>	0.8	ASTM D5993	1 per 40,000 ft <sup>2</sup>

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Bentonite Moisture Content	—	%	—	ASTM D5993	
Grab Tensile Strength	—	lb	—	ASTM D6768	1 per 200,000 ft <sup>2</sup>
Hydraulic Flux	max.	m <sup>3</sup> /m <sup>2</sup> -s	1 x 10 <sup>-8</sup>	ASTM D5887	1 per week for each production line <sup>(2)</sup>
<u>Lap Joint Permeability</u>	<u>Max</u>	<u>cm/sec</u>	<u>1 x 10<sup>-8</sup></u>	<u>Flow Box or other suitable device</u>	<u>1 per material and lap type</u>

Notes:

- Updated methods may be implemented based on a review by the POR.
- Report last 20 test values, ending on production date of supplied GCL.
- For those properties that do not indicate a value, the GCL material must meet the manufacturer's minimum specification.

**Table III73D-1-4: GCL Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Bentonite Mass/Unit Area	ASTM D5993	Not less than 1 test per 100,000 ft <sup>2</sup>
Hydraulic Flux	ASTM D5887	
Direct Shear	ASTM D6243	1 test per GM/adjoining materials

Notes:

- Updated methods may be implemented based on a review by the POR.

## 4.2 Installation Procedures

### 4.2.1 GCL Subgrade Preparation

Surfaces to be lined should be smooth and free of all rocks greater than 0.75-inch diameter (or as recommended by the manufacturer, if less than 0.75 inches), sharp/angular objects, sticks, roots, or debris of any kind. The surface should provide a firm, unyielding foundation for the GCL with no sudden, sharp, or abrupt changes or break in grade. The subgrade surface shall be prepared by rolling with a smooth-drum roller to minimize the roughness and press down protruding soil or rock particles prior to GCL deployment. Loose rocks and/or dry soil particles that could damage the GCL shall be removed. Excessive voids or dimples shall be filled with soil.

The GCL subgrade should be moisture conditioned prior to placing the GCL in final covers. Research has shown that the subgrades with water contents above 10%, or greater than the optimum water content, promotes hydration and osmotic swell in GCLs. These conditions result in GCLs that maintain their low hydraulic conductivities regardless of the amount cation exchange that occurs (Scalia and Benson 2011).

Although the subgrade shall be moist, standing water will not be allowed.

#### 4.2.2 GCL Deployment

Equipment used to deploy GCL must not cause excessive rutting of the subgrade. Deployed GCL panels should contain no folds or excessive slack. Installation personnel must not smoke or wear damaging shoes on GCL. GCL should not be placed during excessive winds. Sand bags should be used to anchor deployed GCL when necessary. In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the GCL. If the POR or CQA monitor observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Generators, gasoline or solvent cans, tools, or supplies must not be stored directly on the GCL. GCL must be rolled into position, not drug across the subgrade. Deployed GCL must not be used as a work area without adequate protection such as a rub sheet.

Panels should be overlapped and seamed, as recommended by the manufacturer. End-to-end seams on sideslopes are not allowed. Care must be taken to assure the GCL is installed with the proper side up. should be kept to a minimum. If end to end seams are necessary (i.e., if the GCL roll lengths are insufficient to cover the entire slope length), a minimum overlap of 5 feet will be required. Alternatively, seams may be glued, as recommended by the manufacturer. In addition, end to end seams may be placed only in the lower half of the slope and must be staggered.

GCL deployment shall be limited to the amount that can be covered with the overlying geomembrane liner the same day. GCL deployment shall not be undertaken during precipitation or when there is an impending threat of precipitation. GCL deployed on 5H:IV or steeper slopes shall be rolled down the slopes, not cross slope.

Following deployment, the CQA monitor shall visually examine the entire surface of the GCL for even bentonite distribution, thin spots, or other panel defects. All defects will be recorded and repaired in accordance with this FCQCP. The QA/QC representative shall also verify the following:

- Adequately moist subgrade
- Proper overlap during deployment
- Seams between GCL panels are constructed per manufacturer's recommendations
- Defects are patched and overlapped properly
- The bentonite has not become excessively hydrated
- No stones, tools, cutting blades or other objects that could damage the GCL are present on the GCL.

Excessively hydrated GCL shall be removed and replaced. Geomembrane shall not be placed on excessively hydrated GCL.

GCL panels shall be given an identification code, mapped, and logged to record relevant installation information.

#### 4.2.3 GCL Repairs

Torn or otherwise damaged geosynthetic facing must be patched with the same type of geosynthetic. The geosynthetic patch must extend at least 12 inches beyond the damaged area and must be heat bonded, or otherwise attached to the main GCL to avoid shifting during placement of overlying geosynthetics. If the GCL damage includes loss of bentonite, the patch must consist of full GCL extending at least 12 inches beyond the damaged area. Lapping procedures must be the same as specified for original laps of GCL panels.

#### 4.2.4 GCL Protection

The overlying geosynthetics and soil layers shall be deployed in such a manner as to ensure that the GCL is not damaged. Textured geomembranes shall not be dragged across previously installed GCL. A smooth rubsheet shall be placed between the GCL and textured geomembrane to prevent damage. The rubsheet will be removed when the geomembrane is in position. Other methods may be employed at the POR's discretion.

To avoid local bentonite displacement, and the possible impact on the hydraulic performance of a GCL, the soil cover material should be placed over the geomembrane and geocomposite overlying the GCL as soon as practicable following completion of the geomembrane and drainage system construction.

## 5.0 GEOMEMBRANE LINER

This section presents general procedures, quality control testing requirements, and construction specifications for geomembrane liner construction. Both the conventional composite final cover system and the alternative composite final cover system will include the following components:

- 40-mil, textured LLDPE geomembrane ~~with the option to install smooth LLDPE on the upper portion of the final cover, which is sloped at 5%;~~
- A geocomposite drainage layer composed of a geonet and filter geotextiles heat-bonded to both sides; and
- 18-inch protective cover soil. The upper 6 inches is an erosion control layer and must be capable of sustaining native plant growth.

### 5.1 Pre-installation Material Evaluation

#### 5.1.1 Manufacturer's Quality Control Certificates

Prior to installing any geomembrane, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. Each quality control certificate

shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in the manufacturing plant using the test methods and frequencies listed in the most recent version of the Geosynthetic Research Institute (GRI) test method GM17, "Test Methods, Test Properties and Testing Frequency for Linear Low Density Polyethylene (LLDPE) Smooth and Textured Geomembranes," included in Attachment 1. The owner may require more frequent testing at his/her discretion.

The POR shall review the test results prior to accepting the geomembrane to assure that the certified minimum properties meet the minimum values for geomembranes, as determined by the most recent GRI test method GM17.

The rolls delivered to the site shall be inventoried, recording the manufacturer's name and product identification, and the roll thickness, number and dimensions. Manufacturer's certificates should be cross-referenced to rolls delivered on-site.

Resumes of the installer's supervisor(s) or Master Seamer(s) shall be obtained to verify that adequate seaming experience will be utilized on the project. The installer's supervisor or Master Seamer shall have had experience totaling a minimum of 2,000,000 square feet of geomembrane installation.

Upon delivery of geosynthetic materials, storage and handling procedures shall also be documented. Rolls of geosynthetic materials shall be handled and stored in such a way as not to damage the material. As a general rule, rolls of geosynthetic materials should not be stacked more than four rolls high.

### 5.1.2 Conformance Testing

In addition to the manufacturer's quality control certificates, samples of the delivered rolls of geomembrane will be obtained either at the manufacturing facility or upon delivery to the site for conformance testing. The test samples shall be ~~obtained for~~ conformance testing by a third party laboratory in accordance with the testing schedule shown in Table III7D-1-5, Geomembrane Conformance Test Schedule.

**Table III7D-1-5: Geomembrane Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Thickness (laboratory measurement)	<del>ASTM D5199 (Smooth)</del> or ASTM D5994 (Textured)	Not less than 1 test per 100,000 ft <sup>2</sup> with not less than 1 per resin lot
Density	ASTM D1505 or D792	
Carbon black content <sup>(5)</sup>	ASTM D4218	
Carbon black dispersion	ASTM D5596	
Tensile properties	ASTM D6693, Type IV	
Direct Shear <sup>(2)(3)(4)</sup>	ASTM D6243	1 test per GM/adjoining materials

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Notes:

1. Updated ASTM or GRI methods may be implemented based on a review by the POR.
2. Direct shear testing shall be performed on the soil or GCL/geomembrane/geocomposite sandwich. Soak interface and apply normal stresses of 100, 200 and 400 psf for at least 1 hour prior to shearing at a displacement rate of 0.04 in/min.
3. The testing results shall be compared to the values used in the final cover system stability analyses included in the Appendix III3B-2E. If the measured interface shear strength is less than the values used in the analyses, the stability of the final cover system shall be reassessed and revised calculations shall be included in the FCSER.
4. Test results from materials used during one construction event may be used in subsequent events provided the materials used are the same and approved by the POR.
5. Other methods such as D1603 (tube furnace) or D6370 (TGA) are acceptable if an appropriate correlation to D4218 (muffle furnace) can be established.

## **5.2 Installation Procedures**

### **5.2.1 Geomembrane Deployment**

The geomembrane shall be installed in direct and uniform contact with the cohesive soil coder or GCL. The geomembrane shall not be placed during inclement weather such as high winds or rain.

Geomembrane seaming should generally not take place when ambient temperatures are below 32 degrees Fahrenheit (°F), unless preheating is used. For extrusion welding, preheating will be required if the temperature is below 32°F. For fusion welding, preheating may be waived if the installer demonstrates that quality welds may be obtained without preheating. Seaming shall not be permitted at ambient temperatures above 104°F, unless the installer can demonstrate that seam quality is not compromised.

In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geomembrane. If the POR observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Personnel working on the geomembrane shall not smoke, wear damaging shoes, or engage in any other activity likely to damage the geomembrane. Only those sections that are to be placed and seamed in one day should be unrolled. Panels left unseamed should be anchored with sandbags or other suitable weights. In general, seams should be oriented parallel to the line of maximum slope (i.e., oriented up and down, not across the slope). In corners and odd-shaped geometric locations, the number of field seams should be minimized.

Panels should be overlapped as recommended by the manufacturer as appropriate for the type of seam welding to be performed; however, overlapping shall be no less than 2 inches. Field seaming shall only be performed by the method(s) approved by the manufacturer, either by extrusion welding or double-tracked fusion welding. No seaming shall take place without the installer's supervisor or Master Seamer and CQA monitor being present. Fishmouths or wrinkles at the seam overlap shall be cut along the ridge of the wrinkle to achieve a flat overlap. The cut shall be seamed and/or patched. Seams shall extend to the outside edge of panels placed in the anchor trench.

### 5.3.3 Destructive Seam Testing

Destructive samples shall be taken at a minimum frequency of one test location, selected randomly, within each 500 linear feet of seam length, inclusive of both primary longitudinal and cross seams, cap strips, and repairs 20 square feet in total area or larger. Each test sample should be of sufficient length and 12 inches wide with the seam located in the middle. Test specimens, approximately 1 inch wide, shall be cut from both ends of the sample for field testing (peel and shear). The remaining sample should be cut into three parts (one for quality assurance laboratory testing, one for installer quality control laboratory testing, and one for archive storage to be maintained at a location selected by the owner).

The field tests shall be conducted on a certified calibrated tensiometer capable of maintaining a constant extension rate of 2 inches per minute. If one of the field test specimens from the ends of the destructive sample fails, then the seam will be considered to have failed, and repairs shall be initiated, as described below. If both specimens pass, then a sample for laboratory testing will be sent to the quality assurance laboratory for testing in both peel and shear. Seam strengths for LLDPE geomembranes shall meet the minimum values specified in the most current version of the Geosynthetic Institute, GRI Test Method GM19, "Seam Strength and Related Properties of Thermally Bonded Polyolefin Geomembranes."

Destructive test results for both field and laboratory tests shall include qualitative data, including the location of the failure and locus-of-break code as described in ASTM D6392. Peel tests on double-tracked fusion welds shall be performed on both inside and outside tracks of the weld. Seam break classifications for extrusion and fusion welds are shown on Figures III7A-1 and III7A-2, respectively.

At a minimum, a destructive test must be done for each welding machine used for seaming or repairs. A sufficient amount of the seam must be removed to conduct field testing, independent laboratory testing, and archiving of enough material to retest the seam when necessary. Destructive seam testing locations shall be cap-stripped and the cap completely seamed by extrusion welding to the geomembrane. Capped sections shall be non-destructively tested. Additional destructive test samples may be taken if deemed necessary by the POR or his/her qualified representative.

Weld Acceptance Criteria: For LLDPE seams ~~(both smooth and textured)~~, the minimum passing criteria for destructive seam testing are described in the Geosynthetic Institute, GRI Test Method GM19. The POR must use the most current version of GM19 when evaluating welded seams.

Seam Failure Delineation: When a sample fails a destructive test, the installer shall trace the welding path to an intermediate location at least 10 feet in each direction, or a distance determined by the POR, from the point of the failed test in each direction and take 1-inch wide specimens for an additional set of field tests. If these additional samples pass the tests, then two laboratory destructive samples shall be taken adjacent to the intermediate locations or at locations determined by the POR or his/her representative. If these laboratory samples pass the tests, then the seam shall be repaired between these locations. If either sample fails, then

the process shall be repeated to establish a zone where the seam should be repaired. All acceptable repaired seams shall be bounded by two locations from which samples passing laboratory destructive tests have been taken.

**Seam Failure Repairs:** Any portion of the geomembrane exhibiting a flaw or failing a destructive or non-destructive test shall be repaired. Repair methods may include spot welding (extrusion) for minor flaws and punctures; patches for larger holes and tears; capping for large lengths of failed seams or panel damage; and extrusion welding of outer flap to repair of an inadequate fusion seam (less than 100-foot cumulative length) that has an exposed edge.

For any repair method, the following provision shall be satisfied:

- Surfaces of the geomembrane that are to be repaired using extrusion methods shall be ground no more than one hour prior to the repair;
- All surfaces shall be clean and dry at the time of repair;
- Patches or caps shall extend at least 6 inches beyond the edge of the defect, and all corners of patches shall be rounded with a radius of approximately 3 inches;
- All repairs shall be non-destructively tested, as previously described; and
- All seaming equipment, personnel, and operation procedures used in repair work shall meet the same requirements as for new seaming operations.

The POR or his/her qualified representative shall observe all non-destructive testing of repairs and shall record the number of each repair, type, date, and test outcome. Repairs that pass the non-destructive tests shall be taken as an indication of an adequate repair. Repairs more than 150 feet long shall also be required to have a destructive test performed. Repairs that fail the initial retest shall be redone and retested until a passing test results. All work and testing of repairs shall be fully documented in a repair log.

When placing overlying material on the geomembrane, effort must be made to minimize wrinkle development. If possible, cover should be placed during the coolest weather available. Small wrinkles should be isolated and covered as quickly as possible to prevent their growth. In no case shall the geomembrane be allowed to fold over on itself.

## 6.0 DRAINAGE LAYER

The geocomposite drainage layer shall conform to the material and performance properties specified in Table III7D-1-6, [Geocomposite Drainage Layer Specifications](#). Manufacturers' certificates of material and performance characteristics shall be obtained and documented at the minimum frequency shown on Table III7D-1-6, [Geocomposite Drainage Layer Specifications](#), with not less than 1 per resin lot. Geosynthetic drainage material conformance testing will consist of transmissivity testing on each material type using the test set-up described in Table III7D-1-6, [Geocomposite Drainage Layer Specifications](#).

The drainage layer is a double-sided geocomposite that consists of a geonet with a non-woven geotextile heat-bonded on both sides deployed over the final cover area. The double-sided geocomposite shall be

anchored in an anchor trench at the perimeter of the final cover area or as shown on Figures III7-2A and III7-2B. The geonet core of the geocomposite will be tied together using plastic ties placed at a frequency of one per 5 feet along the length of the panel and every 6 inches along the ends of the panels. The upper geotextile panels will be secured by either overlapping and heat bonding or field sewn.

Only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geotextile. Personnel working on the geotextile shall not smoke, wear damaging shoes, or engage in any activity that damages the geotextile or underlying geosynthetics.

**Table III7D-1-6: Geocomposite Drainage Layer Specifications<sup>(4)</sup>**

Test Category	Product	Test <sup>a</sup>	Test Method <sup>b</sup>	Testing Frequency
Manufacturer	Resin (Geonet)	Density	ASTM D792 or D1505	One test per 100,000 ft <sup>2</sup> and every resin lot
		Melt Flow Index	ASTM D1238	
Manufacturer	Geonet	Density	ASTM D792 or D1505	One test per 100,000 ft <sup>2</sup> and every resin lot
		Nass / Area	ASTM D5261	
		Thickness	ASTM D5199	
		Compression	ASTM D1621	
		Transmissivity	ASTM D4716	
Manufacturer	Geotextile	Mass/Area	ASTM D5261	One test per 100,000 ft <sup>2</sup> and every resin lot
		Grab Tensile Strength	AASSTM D4632	
		Trapezoidal Tear Strength	ASTM D4533	
		Burst Strength	ASTM D3786	
		Puncture Strength	ASTM D4833	
		Thickness	ASTM D5199	
		Apparent Opening Size	ASTM D4751	
		Permittivity	ASTM D4491	
Independent Laboratory	Geocomposite Product	Transmissivity	ASTM D4716	One test per product type
		Interface Shear or Ply Adhesion	ASTM D5321 OR D413	One test per project

<sup>a</sup> Adapted from EPA/600/R-93/182, September 1993, and *Designing with Geosynthetics*, 6<sup>th</sup> ed.

<sup>b</sup> The POR may propose equivalent or better tests.

GEOCOMPOSITE					
Property	Qualifier	Unit	Value	Test Method	Frequency
Transmissivity	Min.	m <sup>2</sup> /sec	2.6 x 10 <sup>-4</sup>	ASTM D4716 <sup>(2)</sup>	200,000 ft <sup>2</sup>
Ply Adhesion	Min.	lb/in	0.5	ASTM D7005	200,000 ft <sup>2</sup>
GEONET CORE					

Property	Qualifier	Unit	Value	Test Method	Frequency
Thickness	Min.	mils	200	ASTM-D5199	200,000-ft <sup>2</sup>
Density (black resin)	Min.	g/cm <sup>3</sup>	0.940	ASTM-D1505	200,000-ft <sup>2</sup>
Carbon Black Content	Range	%	2 to 3	ASTM-D4218	200,000-ft <sup>2</sup>
<b>GEOTEXTILE</b>					
Property	Qualifier	Unit	Value	Test Method	Frequency
Mass per Unit Area	MARV	oz/yd <sup>2</sup>	6	ASTM-D5264	200,000-ft <sup>2</sup>
AOS		US Sieve (mm)	70 (0.210)	ASTM-D4751	540,000-ft <sup>2</sup>
Puncture Resistance		lb	435	ASTM-D6241	540,000-ft <sup>2</sup>
Grab Tensile Strength		lb	160	ASTM-D4632	540,000-ft <sup>2</sup>

**Notes:**

- ~~(1) Appendix III3B-2E shall be referenced to determine the suitability of the alternate materials.~~
- ~~(2) The transmissivity shall be measured at a minimum gradient of 0.25 under a minimum normal pressure of 1,000 psf with a minimum seating period of 1 hour. If the measured transmissivity is less than this value, the geocomposite must be daylighted at certain intervals. See Appendix III3-B-2E-2 for details.~~

## 7.0 EROSION LAYER

The soil cover layer will consist of an 24-inch thick single protective/erosion layer. See Section 2.0 of this plan for a detailed description of the final cover system.

Soil cover does not require compaction control; however, it should be stable for construction traffic. Care shall be exercised in placement so as not to shift, wrinkle, or damage any underlying geosynthetic layers, and the placement methods shall be documented. Soil cover placement shall be monitored by the POR or his/her representative on a full-time basis.

Only the geocomposite should be placed in direct contact with the geomembrane. Light equipment, such as low ground pressure dozers (less than 5 psi contact pressure), shall be used to place the soil cover and a minimum of 12-inches of material shall be maintained between the dozer and the underlying geosynthetics. If possible, cover should be placed during the coolest weather available. Soil cover material shall be deployed in “fingers” along the geosynthetics to control the amount of slack and minimize wrinkles and prevent folds. Soil cover shall generally be placed in an upslope direction on sideslopes.

The final thickness of the soil cover layer shall be a minimum of 24-inches directly above the geocomposite drainage layer. The required thickness of the layer shall be verified by survey techniques on an established grid system with not less than one verification point per 10,000 square feet of surface area. A minimum of two verification points is required.

The soil used as the soil cover layer will be capable of sustaining native plant growth and must be seeded or sodded immediately after completion of the final cover (weather permitting). Temporary or permanent erosion control materials (i.e., mulches, containment meshes, geomattng systems, etc.) may be used to

minimize erosion and aid establishment of vegetation. An alternative erosion layer may also be constructed (subject to the approval of TCEQ) consisting of cobbles, riprap, or other hard armor systems for areas where establishing vegetative cover has proven difficult.

Other quality assurance for the soil cover layer should consist of continuous observation by the POR or his/her representative during construction; inspection of any manufacturer's or supplier's material test data and certification; and performing any additional test believed necessary by the POR to verify that the layer has been constructed in accordance with the closure plan.

## 8.0 FINAL COVER SYSTEM EVALUATION REPORT

Upon completion of all required final cover construction and evaluation, the POR shall prepare and submit in triplicate the FCSEER, prepared in accordance with this plan, to the TCEQ for review and approval.

Each FCSEER will include a discussion of the construction of the final cover elements and a cover placement map, which not only shows the covered area being submitted for approval, but also the areas covered by all previous FCSEER submittals with the dates of acceptance by the TCEQ. The map should depict the site grid system, graphic scale, and north arrow. It may be a print from a master drawing that is annotated and updated with each new submittal. The FCSEER shall be signed and/or sealed by the POR performing the evaluation and counter-signed by the site operator or his/her authorized representative.

The construction documentation will contain a narrative describing the conduct of work and testing programs required by the FCQCP, "as-built" or record drawings, and appendices of field and laboratory testing. Constructed cover details ("as-builts"), where applicable, will be depicted and will show slopes, widths, and thickness for compaction lifts as determined from the field documentation. The construction documentation report will contain or discuss the following information at a minimum.

**Table III3D-1-7: FCSEER Content**

<b>Cohesive Soil Cover</b>	Pre-construction soil test results
	Summary of construction material conformance tests results
	Summary of field moisture-density control test methods and results
	Summary of hydraulic conductivity test results
	Cohesive soil cover construction practices
	Placement and processing methods
	Observations of soil conditions prior to and after compaction, including soil structure, clod size, and presence of inclusions
	Compaction methods, equipment type, compactor weight and foot length, and number of passes
	Lift tie-in and bonding observations
	Repair of failed and damaged lifts

# POST CLOSURE CARE PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C



**Prepared for:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

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

INTENDED FOR PERMITTING  
PURPOSES ONLY

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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

INTENDED FOR PERMITTING  
 PURPOSES ONLY

## EXECUTIVE SUMMARY

30 TAC §330.63(i) & §330.463(b)(3)(B)

This post-closure plan is prepared in accordance with 30 TAC Chapter 330 Subchapter K and the City shall place a copy of this plan in the operating record upon issuance of this permit. The post-closure plan includes a description of the monitoring and maintenance activities required and the frequency at which these activities will be performed. The City is the responsible for overseeing and conducting post-closure care activities.

City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, TX. 78541  
(956) 381-5635

Also included in this post-closure plan is a description of the planned uses of any portion of the closed unit during the post-closure period in accordance with 30 TAC §330.465. A detailed written estimate, in current dollars, of the cost of post-closure care maintenance and any corrective action as described in this post-closure care plan or required by the TCEQ is included in Part III9B, TCEQ Post-Closure Cost Estimate Form.

## 1.0 POST-CLOSURE CARE REQUIREMENTS

30 TAC §330.463(b)(3)(A)

Monitoring and maintenance activities are required in post-closure care period. Post-closure care activities will follow the measures and conditions specified in Appendix III8A, TCEQ Post Closure Care Plan Form.

A description of these activities and the frequency at which these activities will be performed are included in the following sections.

### 1.1 Post-Closure Care Period

30 TAC §§~~330.463(a)(1), 330.463(b)(1)~~, & §330.463(b)(2)

After professional engineer certification of the completion of closure requirements for a municipal solid waste management unit as accepted by the TCEQ, the City shall conduct post-closure care for the unit for 30 years, unless revised by the TCEQ. The post-closure care period may be decreased by the TCEQ if the City submits to the TCEQ for review and approval a documented certification, signed by a licensed professional engineer and including all applicable documentation necessary to support the certification, which demonstrates that the reduced period is sufficient to protect human health and the environment. The TCEQ may also reduce the post-closure period for the unit if all wastes and waste residues have been removed during closure. The post-closure period care period may be increased by the TCEQ if it is determined that the lengthened period is necessary to protect human health and the environment. If there is evidence of a release from a municipal solid waste unit, the TCEQ may require an investigation into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

### 1.2 Inspection Activities and Correction of Problems

~~30 TAC §330.463 (b)(1)(A)~~

~~30 TAC §330.463(a)(1)~~

The site operator will conduct periodic inspection of the closed units to identify and document deficiency conditions and conduct maintenance and corrective action to maintain compliance. Tables III8-1 through III8-6 provide information on the inspection items and deficiency conditions that the site operator will look for during inspection of the major components of the landfill and the site during the post-closure care period. The City shall correct, as needed, erosion of cover material, lack of vegetative growth, leachate or methane migration, and subsidence or ponding of water on the unit. If any of these problems occur after the end of the five-year post-closure period or persist for longer than the first five years of post-closure care, the City shall be responsible for their correction until the TCEQ determines that all problems have been adequately resolved. Other inspection and maintenance provisions that apply during the post-closure care period as specified in the facility's site operating plan, site development plan, or applicable rules will remain in effect.

The City shall retain the right of entry to and maintain all rights-of-way of a closed municipal solid waste management unit in order to conduct periodic inspections of the closed unit, conduct maintenance and/or remediation activities, as needed, in order to maintain the integrity and effectiveness of all final cover, facility vegetation, and drainage control system, to correct any effects of settlement, subsidence, ponded water, erosion, or other events or failures detrimental to the integrity of the closed unit and to prevent any surface run-on and run-off from eroding or otherwise damaging the final cover system.

### 1.2.1 Right of Entry and Rights-of-way

~~30 TAC §330.463(a)(1) & (b)(1)(A)~~

~~The City shall retain the right of entry to and maintain all rights-of-way of a closed municipal solid waste management unit in order to conduct periodic inspections of the closed unit, conduct maintenance and/or remediation activities, as needed, in order to maintain the integrity and effectiveness of all final cover, facility vegetation, and drainage control system, to correct any effects of settlement, subsidence, ponded water, erosion, or other events or failures detrimental to the integrity of the closed unit and to prevent any surface run-on and run-off from eroding or otherwise damaging the final cover system.~~

During the post-closure monitoring and maintenance period of the site, the facility access and Rights-of-way will be inspected quarterly. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.

**Table III8-1: Access and Right-of-way Inspection Items**

Inspection Item	Types of Deficiency Conditions
Gates, Gate Locks and Barriers	Damaged, gates unlocked/locks missing, signs of site entry detected
Fence and other Access Control Barriers	Damaged, broken, signs of entry detected
Vegetation Control in Areas of the Facility other than the Final Cover	Vegetative stress, overgrowth, vegetation other than what was designated in that area

### 1.2.2 Final Cover

During the post-closure monitoring and maintenance period of the site, the final cover will be inspected quarterly. Monitoring and maintenance activities will be performed to maintain the integrity and effectiveness of the final cover system. Items included in the quarterly assessment will include inspection

### 1.2.4 Leachate Collection and Removal System

30 TAC §330.463(b)(1)(B)

The City shall maintain and operate the leachate collection and removal system throughout the post-closure care period in accordance with the requirements of 30 TAC §330.331 and §330.333 and Part III3, Waste Management Unit Design Report. The components of the leachate collection and removal system will be routinely inspected to maintain its integrity and effectiveness. The need for maintenance will be assessed based on performance during routine monitoring. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection. The TCEQ may allow the City to stop managing leachate if the City demonstrates to the approval of the TCEQ that leachate no longer poses a threat to human health and the environment.

**Table III8-4: Leachate Collection and Removal System Inspection Items**

Inspection Item	Types of Deficiency Conditions
Leachate Pumps	Visible damage to pumps, abnormal flow rates or odors.
Leachate Forcemain	Visible damage to forcemains, abnormal flow rates or odors.
Leachate Collection Lines	Abnormal flow rates or odors. Leachate collection lines may need periodic cleaning or flushing to dislodge biological mass or fines than may have clogged the pipe <del>performations</del> perforations.

### 1.2.5 Landfill Gas Management System

The City shall maintain and operate the landfill gas management system throughout the post-closure care period in accordance with the requirements of Part III6, Landfill Gas Management Plan. The components of the landfill gas management system will be routinely inspected to maintain its integrity and effectiveness. The need for maintenance will be assessed based on performance during routine monitoring. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.

**Table III8-5: Landfill Gas Management System Inspection Items**

Inspection Item	Types of Deficiency Conditions
Gas Wells	Visible damage and landfill gas extraction performance.
Lateral and header piping	Cracks, bends, breakage or blockage of landfill gas flow
Condensate Sumps	Visible damage and performance.
Flare Station	Visible damage and performance. May need calibration.

### 1.2.6 Groundwater and Gas Monitoring Systems

During the post-closure monitoring and maintenance period of the site, the groundwater and gas monitoring systems will be routinely inspected to maintain their integrity and effectiveness. Particular attention will be paid to ensure that monitoring equipment is calibrated according to the manufacturers' recommendations. Maintenance of the groundwater and gas monitoring systems will be performed prior to or during the next scheduled sampling or monitoring event, depending on the extent of the repairs or maintenance required.

**Table III8-65: Groundwater and Gas Monitoring Inspection Items**

Inspection Item	Types of Deficiency Conditions
Groundwater Monitoring Wells	Visible damage to protective casing, well locks, or concrete pads.
Landfill Gas Monitoring Probes	Visible damage to protective casing, well locks, or concrete pads.

### 1.3 Continuation of Monitoring Programs

~~30 TAC §330.463(a)(2)&(3)~~

Groundwater and gas monitoring programs in effect during the life of the unit shall be continued during the post-closure care period. If there is evidence of a release from a municipal solid waste unit, the TCEQ may require an investigation into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

#### 1.3.1 Groundwater Monitoring System

30 TAC §330.463(b)(1)(C)

Groundwater monitoring activities will continue throughout the post-closure care period in accordance the requirements of 30 TAC Chapter 330 Subchapter J and Part III5B, Groundwater Sampling and Analysis Plan (GWSAP). All groundwater monitoring wells including in the groundwater monitoring network will be monitored semi-annually unless otherwise approved by the TCEQ. If there is evidence of a confirmed statistically significant increase over constituent background values, the City shall implement an assessment monitoring plan outlined in Part III5B, GWSAP.

#### 1.3.2 Gas Monitoring System

30 TAC §330.463(b)(1)(D)

Landfill gas monitoring activities will continue throughout the post-closure care period, in accordance with the requirements of 30 TAC Chapter 330 Subchapter I and Part III 6, Landfill Gas Management Plan, as conducted during the active facility operations. All structures and permanent gas monitoring probes will be sampled quarterly unless otherwise approved by the TCEQ. If there is evidence of confirmed landfill gas

migration from the waste management units at the facility, the City shall implement the contingency plan in Part III6, Landfill Gas Management Plan.

#### **1.4 Documentation and Record Keeping**

##### 30 TAC §330.463(b)(3)

The City will document and maintain detailed records of all inspection results and schedules, maintenance, monitoring results and schedules, or remediation activities of any other actions to be taken to maintain compliance in the site operating record.

The City shall place a copy of the post-closure care plan in the operating record by the initial receipt of waste. The post-closure care plan shall include, at a minimum, the following information:

##### **1.4.1 Description of Monitoring and Maintenance Activities**

###### 30 TAC §330.463(b)(3)(A)

The post-closure care plan shall include a description of the monitoring and maintenance activities required in 30 TAC §330.463(b)(1) for each unit, and the frequency at which these activities will be performed. Monitoring and maintenance activities required and the frequency at which these activities will be performed are included in §1.0, Post-Closure Care Requirements and Appendix III8A, TCEQ Post Closure Care Plan.

##### **1.4.2 Post-Closure Care Responsibility**

###### 30 TAC §330.463(b)(3)(B)

The post-closure care plan shall include the name, address, and telephone number of the office or person responsible for overseeing and/or conducting the post-closure care activities at the closed unit or facility during the post-closure period. The City is the responsible for overseeing and conducting post-closure care activities.

\_\_\_\_\_  
City of Edinburg  
\_\_\_\_\_  
Department of Solid Waste Management  
\_\_\_\_\_  
8601 North Jasman Road  
\_\_\_\_\_  
Edinburg, TX. 78541  
\_\_\_\_\_  
(956) 381-5635

##### **1.4.3 Post-Closure Planned Uses**

###### 30 TAC §330.463(b)(3)(C)

The post-closure care plan shall include a description of the planned uses of any portion of the closed unit during the post-closure period in accordance with 30 TAC §330.465, Certification of Completion of Post-

Closure Care. Currently, post-closure land use is anticipated to be open space, and will be in accordance with requirements for development over a closed MSW landfill in post-closure care in 30 TAC §330.954(c).

#### 1.4.4 Post-Closure Care Cost Estimate

30 TAC §330.463(b)(3)(D)

The post-closure care plan shall include a detailed written estimate, in current dollars, of the cost of post-closure care maintenance and any corrective action as described in the post-closure care plan or required by the executive director or the commission and which satisfies the requirements specified in 30 TAC §330, Subchapter L. A detailed post-closure care cost ~~written estimate, in current dollars, of the cost of post-closure care maintenance and any corrective action as described in this post-closure care plan or required by the TCEQ~~ is included in Part III9B, TCEQ Post-Closure Care Cost Estimate Form.

### ~~1.4 DOCUMENTATION AND RECORD KEEPING~~

~~2.0 THE CITY WILL DOCUMENT AND MAINTAIN DETAILED RECORDS OF ALL INSPECTION RESULTS AND SCHEDULES, MAINTENANCE, MONITORING RESULTS AND SCHEDULES, OR REMEDIATION ACTIVITIES OF ANY OTHER ACTIONS TO BE TAKEN TO MAINTAIN COMPLIANCE IN THE SITE OPERATING RECORD.~~

### ~~3.0 POST-CLOSURE LAND USE~~

#### ~~4.0 30 TAC §330.463(B)(3)(C)~~

~~2.0 CURRENTLY, POST-CLOSURE LAND USE IS ANTICIPATED TO BE OPEN SPACE, AND WILL BE IN ACCORDANCE WITH 30 TAC §330, SUBCHAPTER T, RELATED TO USE OF LAND OVER CLOSED MUNICIPAL SOLID WASTE LANDFILLS.~~ **COMPLETION OF POST-CLOSURE CARE**

**5.0** Completion of post-closure care will follow the conditions specified in Appendix III8A, TCEQ Post Closure Care Plan Form.

#### **5.12.1 Certification of Post-Closure Care Completion**

30 TAC §330.465(a)

Following completion of the post-closure care maintenance period for each municipal solid waste landfill unit, the City shall submit to the TCEQ for review and approval a certification, signed by an independent licensed professional engineer, verifying that post-closure care has been completed in accordance with this post-closure plan. The submittal to the TCEQ shall include all applicable documentation necessary for the certification of completion of post-closure care. Once approved, the certification and all applicable documentation will be included in the site's operating record.

### **5.22.2 Voluntary Revocation**

30 TAC §330.465(b)

Upon completion of the post-closure care period for the final unit at a facility, the City shall also submit to the TCEQ a request for voluntary revocation of the facility permit. Once approved, the voluntary revocation and will be included in the site's operating record.

**APPENDIX III8A**

**TCEQ POST CLOSURE CARE PLAN FORM**



PERMIT AMENDMENT APPLICATION

Part III, Attachment 9

# CLOSURE AND POST-CLOSURE COST ESTIMATES

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



## EXECUTIVE SUMMARY

30 TAC §§330.63(j) & 305.70(j)(30)

The City has included a cost estimate for closure and post-closure care in accordance with 30 TAC §330 Subchapter L and documentation required to demonstrate financial assurance as specified in 30 TAC §37 Subchapter R. The City may request as permit modification that does not require notice in accordance with the 30 TAC §330.305(j)(30), for changes to a closure or post-closure care cost estimate required under 30 TAC §§330.503 or 330.507 that result in an increase/decrease in the amount of financial assurance required if the increase/decrease in the cost estimate is due to an increase/decrease in the maximum area requiring closure.

**1.0** —

## **2.01.0 CLOSURE COST ESTIMATE E.I.2**

30 TAC §330.503(a)

The detailed written cost estimate, in current dollars, showing the cost of hiring a third party to close the largest waste fill area that could potentially be open in the year to follow and those areas that have not received final cover in accordance with Part III7, Closure Plan is included in Appendix III9A, TCEQ Closure Care Cost Estimate Form. ~~This means the completion of the final closure requirements for active and inactive fill areas as depicted on Figure III9-1, Maximum Closure Area.~~

### **2.41.1 Annual Review**

30 TAC §330.503(a)(1)

The City shall review the facility's permit conditions on an annual basis and verify that the current active areas match the areas on which closure cost estimates are based.

#### **2.4.11.1.1 Closure Cost Increase**

30 TAC §330.503(a)(2)

An increase in the closure cost estimate and the amount of financial assurance shall be made if changes to the final closure plan or the landfill conditions increase the maximum cost of closure at any time during the remaining active life of the unit.

#### **2.4.21.1.2 Closure Cost Reduction**

30 TAC §330.503(a)(3)

A reduction in the closure cost estimate and the amount of financial assurance may be approved if the cost estimate exceeds the maximum cost of closure at any time during the remaining life of the unit and the City has provided written notice to the TCEQ of the situation that includes a detailed justification for the reduction of the closure cost estimate and the amount of financial assurance. The City may request a reduction in the cost estimate and the financial assurance as a permit modification in accordance with 30 TAC §330.305(j)(30).

### **2.21.2 Financial Assurance**

30 TAC §330.503(b)

The City has established financial assurance for closure of the municipal solid waste units in accordance with 30 TAC §37, Subchapter R. Continuous financial assurance coverage for closure shall be provided

until the facility is officially placed under the post-closure maintenance period and all requirements of Part III7, Closure Plan have been approved as evidenced in writing by the TCEQ.

In accordance with 30 TAC §37.131, during the active life of the facility, the current cost estimate will be adjusted annually for inflation within 60 days prior to the anniversary of the establishment of the financial instrument(s) used. The evidence of any additional financial assurance will be provided to the TCEQ within 30 days after the anniversary date of the first establishment of the financial assurance mechanism.

The adjustment for inflation may be made by recalculating the maximum cost of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the US Department of Commerce in the Survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. Multiplying the closure cost estimate by the inflation factor makes the first adjustment. The result is the adjusted closure cost estimate. Multiplying the latest adjusted closure cost estimate by the latest inflation factor makes subsequent adjustments. If the TCEQ approves a revised closure cost estimate prior to the annual inflation update, an additional update for inflation only is not required. The regular annual inflation update will resume the following year.

In accordance with 30 TAC §330.63(j), a copy of the financial assurance documentation for closure of the facility is included in Appendix III9C, [Current Evidence of Financial Assurance](#).

### **3.02.0 POST-CLOSURE CARE COST ESTIMATE**

30 TAC §330.507(a)

The City has provided in Appendix III9B, TCEQ Post-Closure Care Cost Estimate Form a detailed written cost estimate, in current dollars, of the cost of hiring a third party to conduct post-closure care activities for the municipal solid waste units, in accordance with the post-closure care plan. The post-closure care cost estimate used to demonstrate financial assurance in 30 TAC §330.507(b) shall account for the total costs of conducting post-closure care for the largest area that could possibly require post-closure care in the year to follow, including annual and periodic costs as described in the post-closure care plan over the entire post-closure care period.

#### **3.12.1 Annual Review**

##### **3.1.12.1.1 Increase in Post-Closure Care Cost Estimate**

30 TAC §330.507(a)(1)

An increase in the post-closure care cost estimate and the amount of financial assurance provided under 30 TAC §330.507(b) shall be made if changes in the post-closure care plan or the unit conditions increase the maximum costs of post-closure care.

### **3-1-22.1.2 Reduction in Post-Closure Care Cost Estimate**

30 TAC §330.507(a)(2)

A reduction in the post-closure care cost estimate and the amount of financial assurance provided under 30 TAC §330.507(b) may be allowed if the cost estimate exceeds the maximum costs of post-closure care remaining over the post-closure care period and the City has provided written notice to the TCEQ of the detailed justification for the reduction of the post-closure cost estimate and the amount of financial assurance. The City may request a reduction in the cost estimate and the financial assurance as a permit modification in accordance with 30 TAC §330.305(j)(30).

### **3-22.2 Financial Assurance**

30 TAC §330.507(b)

The City has established financial assurance for the costs of post-closure care of the unit in accordance with 30 TAC §37, Subchapter R. Continuous financial assurance coverage for post-closure care shall be provided until the facility is officially released in writing by the TCEQ from the post-closure care period in accordance with all requirements of the Part III8, Post-Closure Care Plan.

In accordance with 30 TAC §37.131, during the active life of the facility, the current cost estimate will be adjusted annually for inflation within 60 days prior to the anniversary of the establishment of the financial instrument(s) used. The evidence of any additional financial assurance will be provided to the TCEQ within 30 days after the anniversary date of the first establishment of the financial assurance mechanism.

The inflation adjustment may be made by recalculating the maximum cost of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the US Department of Commerce in the Survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. Multiplying the closure cost estimate by the inflation factor makes the first adjustment. The result is the adjusted closure cost estimate. Multiplying the latest adjusted closure cost estimate by the latest inflation factor makes subsequent adjustments. If the TCEQ approves a revised post-closure cost estimate prior to the annual inflation update, an additional update for inflation only is not required. The regular annual inflation update will resume the following year.



In accordance with 30 TAC §330.63(j), a copy of the financial assurance documentation for post closure care of the existing facility is included in Appendix III9C, Current Evidence of Financial Assurance.



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  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

**July 2017**  
**Revised: November 2017**

**Project No. 1401491**



Appendix IVG Regulated Asbestos Containing Material Handling Plan  
Appendix IVH Special Waste Handling Acceptance Plan  
Appendix IVI Liquid Waste Solidification Plan

## 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 ~~at the facility~~ 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)

## 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	<a href="#">Director of Solid Waste Management</a> , <a href="#">Site Manager</a> , or <a href="#">Designee</a>	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	<a href="#">Director of Solid Waste Management</a> , <a href="#">Site Manager</a> , or <a href="#">Designee</a>	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	<a href="#">Director of Solid Waste Management</a> , <a href="#">Site Manager</a> , or <a href="#">Designee</a>	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	<a href="#">Director of Solid Waste Management</a> , <a href="#">Site Manager</a> , or <a href="#">Designee</a>	Place completed Load Inspection Report in SOR
Unauthorized Material Removal	Document removal of unauthorized materials from the landfill.	Per Occurrence	<a href="#">Director of Solid Waste Management</a> , <a href="#">Site Manager</a> , or <a href="#">Designee</a>	Complete Unauthorized Material Removal form and place in SOR

Description of Activity	Task	Frequency	Inspector	Inspection Documentation
			<u>Designee Site Manager or Designee</u>	
Final Cover Inspection	Inspect final cover for erosion and damage to drainage structures.	As indicated in the SWPPP or weekly at a minimum	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	Complete documentation and place in SOR
On-site Litter Collection	Inspect site for litter. Collect litter on a daily basis and return to the working face for proper disposal.	Daily	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	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	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	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	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	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	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	Complete documentation and place in SOR
Roadway Regrading	Inspect on-site access roadways to ensure a clean and safe condition.	As needed or Quarterly	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	Complete documentation and place in SOR

Description of Activity	Task	Frequency	Inspector	Inspection Documentation
Site Signs	Inspect all site signs for damage, general location, and accuracy of posted information.	Weekly	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	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	<u>Director of Solid Waste Management, Site Manager, or Designee Site Manager or Designee</u>	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
<b>Site Manager</b>	Responsible for all activities, ensure adequate staffing, inspections	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>Gate Attendant</b>	Take receipts, screen and some load inspection, direct vehicles to unloading area	X			X	X	X	X	X		X		X		
<b>Equipment Operator</b>	Compact waste, visual inspection of loads, unauthorized waste identification, apply daily cover	X		X	X	X	X	X	X	X	X		X		As Assigned
<b>Laborer</b>	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 half of one percent of the incoming loads per week (no less than on load per day) a minimum of two vehicles per week (including compactor vehicles) 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)

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 Dimensionstable](#).

**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.

- **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. Currently, fencing has been installed along the southern boundary of Type IV Landfill TCEQ Permit MSW-2302 and facility entrance, along the west side of the facility entrance, along the southern facility boundary from the site entrance to the west facility boundary, and along the west facility boundary as shown on Figure II-16, Facility Entrance Plan. The northern and eastern portions of the facility boundary are adjacent to City owned property where the land use is primarily agricultural and the southern portion is adjacent to Type IV Landfill, TCEQ Permit MSW-2302, and hence providing adequate control to public access. However, fencing will be incrementally installed along the northern facility boundary and east of the facility on City owned property to provide an additional barrier to control public access.~~

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 placed 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
Citizen’s Collection Station	Private citizen and other small loads may be delivered to the citizen’s collection station.	40,000 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 IV GE, 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 Citizens Collection Station

##### 4.6.1.5 30 TAC §330.213

The citizens collection station will be used for small loads. The gate attendant will direct vehicles to this area as appropriate. Roll-off boxes will be provided to unload waste. The boxes will be emptied at the working face as needed. The maximum size will be 40,000 sqft. (e.g., 200 feet by 200 feet).

The type and quantity of containers provided will correspond to anticipated waste receipt volumes. Containers will be delivered to an active disposal area daily or tarped overnight. The City will supervise the

area designated for citizen's collection routinely in order to maintain it in a sanitary condition. Rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance. Citizen's collection may accept sharps from single-family or multi-family dwellings, hotels, motels, or other establishments that provide lodging and related services for the public. The sharps will not be considered medical waste, as defined in 30 TAC §330.3.

#### 4.6.1.6 Reusable Materials Storage

30 TAC §330.209(a)

##### 4.6.1.6

~~Recyclable or 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).

~~Recyclable or reusable materials may be received and staged at the facility.~~ The size of the stockpiles may vary depending on the amount of reusable ~~or recyclable~~ 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.

#### 4.6.1.7 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.

#### 4.6.1.8 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

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Submitted: July 2017

Revised: November 2017

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.

~~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 containers.~~

~~Scrap tires shall be split, quartered, or shredded within 180 days from the date of delivery of the scrap tire.~~

~~The average length of time tires will be stored is 90 days.~~

#### **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.

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 ~~reference~~ 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

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 III E2-3, 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.

#### 4.19 Landfill Gas

30 TAC §330.159

All landfill gases will be monitored in accordance with Part III 6, 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.

#### 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). The City may submit a demonstration for TCEQ approval that material exceeding 1,500 mg/kg TPH can be a suitable ADC. The demonstration shall include information regarding the risk to human health and the environment and the information required in §4.22.3.1, Required ADCOP Information. If approved, the TCEQ may impose additional permit requirements regarding the use of this material.

#### 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)

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 regraded within seven days of the occurrence. Ponded water areas may be corrected by implementing one or more of the following procedures within seven days of the occurrence:

- 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. This contaminated water will either be allowed to flow into the leachate collection system for removal or pumped directly into the leachate force main. 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 Area

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. A maximum of 50 tons of materials may be stored at one time. These materials can be stored for a maximum of 72 hours and 24 hours on average. ~~The liquid waste stabilization basin will have a cover for odor control.~~ [IC1]

~~To process/stabilize 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 metal basin placed within a disposal cell with an approved TCEQ liner system. The basin will be secured with landfill material and soil. The soil will be graded around the liquid waste stabilization basin (basin) to ensure that stormwater runoff is directed away from the basin. The basin will be placed to ensure a minimum of 1 foot of the basin extends above the surrounding soil. Using an excavator or similar mixing equipment, the liquid wastes will be mixed promptly upon receipt with a stabilizing material (see Appendix IVH, Special Waste Handling Acceptance Plan) or soil 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. The bottom of the basin will be at least 10 feet above the top of the protective cover soil composite of the lining system and founded in the waste. Various sizes of metal basins may be used~~

~~throughout the life of the site. Once stabilized, the waste will be removed from the basin promptly and landfilled at the facility. If necessary, the 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 from the basin and deposited in the active face for landfilling.~~

#### 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, but limited to, 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, and the City will not discharge contaminated water without specific written authorization. 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).~~

#### **4.29.1 Contaminated Water**

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 contaminated water storage area, 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 with one foot of freeboard. ~~Contaminated water will either be allowed to flow into the leachate collection and removal system or any ponded contaminated water will be pumped within seven days of occurrence directly into the leachate force main connected to a public sewer system in accordance with Part III3, Waste Management Unit Design.~~

#### **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, Waste Management Unit Design.~~

#### **Gas Condensate:**

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

#### **4.29.3 Cleaning and Washing of Equipment**

~~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 (Protreatment Regulations).~~ Wastewater generated from the cleaning and washing of equipment, to be performed only within a constructed waste disposal unit constructed in accordance with 30 TAC §330.331(b), will either be allowed to flow into the leachate collection and removal system or any ponded wastewater will be pumped within seven days of occurrence directly into the leachate force main connected to a public sewer system in accordance with Part III3, Waste Management Unit Design.

#### 4.30 Citizen's Collection

30 TAC §330.213

Waste accepted from citizens and other small loads may be delivered to an area designated for citizen's collection where waste shall be unloaded in to roll-off containers whereas the quantity of containers provided will correspond to anticipated waste receipt volumes. Roll-off containers shall be leak-proof to maintain sanitary conditions per 30 TAC §330.211. Containers will be delivered to active disposal area daily or tarped overnight. The City will supervise the area designated for citizen's collection routinely in order to maintain it in a sanitary condition. Rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance. Citizen's collection may accept sharps from single-family or multi-family dwellings, hotels, motels, or other establishments that provide lodging and related services for the public. The sharps will not be considered medical waste, as defined in 30 TAC §330.3.

#### 4.31 Waste Relocation

The 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 34 degrees.
- Leachate found while uncovering buried waste shall be properly disposed in accordance to §4.29, Contaminated Water Management.
- 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.
- Use of any additional personal protection equipment required to safeguard health.

**APPENDIX IVG**

**REGULATED ASBESTOS CONTAINING MATERIAL HANDLING PLAN**



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**

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

**July 2017**  
**Revised: November 2017**

**Project No. 1401491**



## **1.0 INTRODUCTION 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 Edinburg Regional Disposal 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.

Because of the movement of active disposal areas, a dedicated specific area or areas of the landfill to receive RACM cannot be effectively be defined. Therefore, the City by means of this application is providing written notification to the TCEQ that the entire permitted fillable area of the landfill will be considered as potential RACM disposal areas. An on-site map identifying areas for RACM disposal will be maintained at the facility and will be revised as needed to include additional constructed areas as potential disposal areas for RACM. RACM disposal locations will either be surveyed or located by the site grid location.

## **2.0 NOTIFICATION**

~~The landfill manager should be notified by the transporter at least 24 hours in advance of the delivery. Less than 24 hour notice is acceptable provided the landfill manager determines that the load can be properly handled and covered.~~

## **3.02.0 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 ~~landfill manager~~DSWM, SM, or his designated representative 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.

### **3.12.2 Initial 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)

~~Due to the movement of the active disposal area at the Edinburg, a specific or separate cell or disposal area cannot effectively be defined. However, the entire permitted fillable area of the landfill will be considered as potential RACM disposal area. An on-site map identifying the RACM area will be maintained at the Landfill and will be revised as needed to include additional constructed areas as disposal areas for RACM. RACM disposal locations will either be surveyed or located by the site grid location.~~

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.

### **3.22.4 Methods of 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.

### **3.32.5 Cover Placemnting the Asbestos Waste**

30 TAC §330.171(c)(3)(G)

~~Asbestos waste~~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.

### **3.4 Grid System Control**

~~A 3-D grid system will be utilized to identify where the waste will be disposed. The site grid system (i.e., 100 foot markers) and 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.~~

### **4.03.0 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.

#### **4.13.1 Manifests**

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

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

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

#### **4.23.2 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:

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

#### **4.33.3 Monthly Waste Receipt Summary**

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

#### **4.43.4 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.

#### **5.04.0 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).

##### **5.14.1 Respirators**

- a)  Must be NIOSH approved.
- b)  Must be fit-tested to each individual.
- e)  Must be clean and properly maintained.

##### **5.24.2 Personal Protective Equipment**

- a)  Disposable Tyvek or similar coveralls.
- b)  Gloves (when necessary).
- e)  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.

#### **6.05.0 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:

- a)  Asbestos and its health effects.
- b)  Regulations on transportation, disposal and worker protection.
- e)  Paperwork, manifesting and notification requirements.
- d)  Personal protection and protective equipment (including respirator fit tests).
- e)  Transportation requirements.
- f)  RACM receipt procedures.

- g)  RACM disposal procedures.
- h)  Location logging and record keeping.
- i)  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.

### **7.06.0 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 ~~Landfill~~DSWM, SM-Manager, or ~~his designated representative~~designee, shall be in charge of the ~~Landfill~~facility's spill response for RACM. The following procedures will be followed in the event of a spill of RACM at or near the landfill:

#### **7.16.1 Personal Protection**

- a)  Get upwind of the RACM
- b)  Employees involved in cleanup should make use of the following PPE, including:
  - i.  Respirator
  - ii.  Disposable coveralls
  - iii.  \_\_\_\_\_ Shoe covers
  - iv.  \_\_\_\_\_ Gloves
  - v.  Safety glasses or goggles
- e)  Keep others away until cleanup is complete.

#### **7.26.2 Notification**

- a)  Notify the ~~landfill office~~DSWM of SM/landfill manager.

- b) 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.

### **7.36.3 Emergency Cleanup Actions**

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

### **7.46.4 Spill Response Equipment**

- 1. An OSHA approved respirator with the proper pre-filters.
- 2. A disposable, Tyvek or similar coverall suit.
- 3. Disposable gloves.
- 4. Rubber boots.
- 5. 6-mil plastic bags with asbestos warning.
- 6. Water spray tank.
- 7. Roll of duct tape.
- 8. Broom and shovel.

**APPENDIX IVH**  
**SPECIAL WASTE ~~HANDLING-ACCEPTANCE~~ PLAN**

**APPENDIX IVH-3**

**TCEQ ~~GUIDANCE DOCUMENTS'S RG-022, GUIDELINES FOR THE CLASSIFICATION AND CODING~~  
~~OF INDUSTRIAL AND HAZARDOUS WASTES~~**

RG-003

DISPOSAL OF SPECIAL WASTES ASSOCIATED WITH THE DEVELOPMENT OF OIL, GAS, AND  
GEOTHERMAL RESOURCES



# Disposal of Special Wastes Associated with the Development of Oil, Gas, and Geothermal Resources

This document provides recommendations for the management of special wastes associated with the exploration, development, or production of oil, gas, or geothermal resources that are regulated by the Railroad Commission of Texas (RRCT) and that are being disposed of in landfills permitted by the Municipal Solid Waste (MSW) Permits Section of the

Texas Commission on Environmental Quality (TCEQ) in accordance with Title 16, Texas Administrative Code, Section 3.30, and 30 TAC 330.3(148)(P). Some of the special wastes listed below require written authorization for disposal. Column 5 details the requirements for special waste disposal.

Description of Waste Items	RCRA Exempt per 40 CFR Part 261.4(b)(5) (see Note 1)	RRCT Authority Required for Disposal in TCEQ Landfill?	Treatment or Testing Recommended (see Note 2)	TCEQ Approval Required Prior to Disposal / Other Options
Asbestos-containing material	No Subject to specific regulations	Yes	Comply with Federal & State regulations for removal & disposal	No per §330.171(c)
Bags (empty), paper	No	No	None	No
Brush & vegetation from clearing land, uncontaminated	No	No	None	No / Disposal in Type IV landfill, compost facility
Buckets, detergent (empty)	No	No	None	No / Recycle
Buckets, grease (empty)	No	No	None	No / Recycle
Concrete, contaminated from compressor stations, oil, or gas facilities	No	Yes	Test for COCs on a case-by-case basis	Yes
Concrete, uncontaminated	No	No	None	No / Disposal in Type IV landfill
Containers (empty)	No	No	None	No / Recycle
Drill cuttings	Yes	Yes	Test for COCs on a case-by-case basis	Yes
Barrels, drums, 5-gallon buckets (empty)	No	No	None	No / Recycle
Fiberglass tanks & pipe (empty)	No	No	Clean, cut or shred	No
Filters—amine, dehydration, glycol	Yes	Yes	Drain, air dry for 48 hrs., test for TPH & benzene	Yes
Filters—cooling tower	Yes (No, if generated in transportation)	Yes	Drain, air dry for 48 hrs., test for chromium	Yes
Filters—saltwater	Yes	Yes	Drain, air dry for 48 hrs., test for pH, TPH, & chlorides	Yes
Filters— waste oil (1) entire unit is inside	No	Yes	Separate parts, recycle oil & metal parts	Yes

Description of Waste Items	RCRA Exempt per 40 CFR Part 261.4(b)(5) (see Note 1)	RRCT Authority Required for Disposal in TCEQ Landfill?	Treatment or Testing Recommended (see Note 2)	TCEQ Approval Required Prior to Disposal / Other Options
metal container				
(2) replaceable fiber or paper filter inside unit	No	Yes	Drain for at least 24 hrs., recycle, waste-to-energy, test for lead & benzene	Yes
Iron sponge	Yes	Yes	Allow to oxidize completely to prevent combustion	Yes
Office trash, routine	No	No	None	No / Recycle
Metal plates, pipes, cable	No	No	None	No / Recycle
Molecular sieves	Yes	Yes	Cool in non-hydrocarbon, inert atmosphere; hydrate in ambient air for 24 hrs., test for TPH & benzene	Yes
Muds—drilling	Yes	Yes	Test for barium, TPH, & BTEX; treatment to reduce hydrocarbons may be required	Yes
Muds—sacks of unused drilling mud	No	Yes	Return to vendor, use at other sites	Yes
Muds—unused additives	No	Yes	MSDS, test for barium	Yes
“Pigging waste” from gathering lines in primary field operations	Yes	Yes	MSDS for corrosion inhibitors, test for TPH, benzene, RCRA metals, & NORM	Yes
“Pigging waste” from transmission lines	No	Yes	MSDS for corrosion inhibitors, TPH, benzene, & arsenic	Yes
Pipe scale & other deposits removed from piping & equipment	Yes (No, if generated in transportation)	Yes	Test for TPH, RCRA metals, & NORM	Yes
Pipe dope, unused	No	Yes	MSDS (may contain lead), re-use if possible	Yes
Plastic pit liners	Yes	Yes	Decontaminate	No
Pumps, valves, etc.	No	No	Test for NORM	No / Recycle
Rags & gloves, soiled	No	No	None	No
Sand—produced during exploration	Yes	Yes	Test for TPH, benzene, & NORM	Yes
Soil—containing crude oil hydrocarbon	Yes (No, if generated in transportation)	Yes	Test for TPH & benzene	Yes
Soil—containing lube oil hydrocarbons	No	Yes	Test for cadmium, chromium, lead, TPH, benzene, PCBs	Yes
Sulfur—ferrous elemental sulfur & soil contaminated with sulfur	No	Yes	Recover sulfur	Yes
Sorbent pads—crude oil & other exempt wastes	Yes	Yes	Test for TPH & benzene	Yes
Sorbent pads—lube oil & other nonexempt wastes	No	Yes	Test for TPH & benzene	Yes
Tank seals—rubber	No	Yes	Allow to drain	Yes / Recycle

Description of Waste Items	RCRA Exempt per 40 CFR Part 261.4(b)(5) (see Note 1)	RRCT Authority Required for Disposal in TCEQ Landfill?	Treatment or Testing Recommended (see Note 2)	TCEQ Approval Required Prior to Disposal / Other Options
Tower packing	No	Yes	Test for chromium	Yes / Recycle
Water-treatment backwash solids	Yes	Yes	Test for RCRA metals & NORM	Yes
Wooden pallets, uncontaminated	No	No	None	No / Disposal in Type IV landfill

- The scope of the RCRA exemption for oil and gas wastes is limited to drilling fluid and cuttings, produced water, and other waste unique or intrinsic to exploration and production in "primary field operations." Guidance for determining whether an oil and gas waste is exempt or nonexempt, including the definition of "primary field operations," is available in the Railroad Commission's manual, *Interim Guidance for Statewide Rule 98* (available online at <[www.rrc.state.tx.us/divisions/og/swr98/index.html](http://www.rrc.state.tx.us/divisions/og/swr98/index.html)>). Oil and gas waste is always nonexempt when generated in transportation operations (i.e., downstream of primary field operations).
- A less expensive alternative to the toxicity characteristic leaching procedure (TCLP) analysis is a total constituent analysis. If a total (i.e., total lead, total benzene, etc.) exceeds the example limits listed below or exceeds 20 times the TCLP limit for a Class 2-like waste, then the TCLP must be performed and the TCLP results must not exceed the stated limits for disposal in a standard MSW Type I landfill unit. For TCLP results that exceed the example limits listed below but do not exceed a hazardous limit, the waste may be authorized for disposal into an MSW Type I landfill with a Class 1 industrial waste unit. More TCLP limits can be found on Table 1, Appendix 1 of 30 TAC 335 Subchapter R:

Constituent	Total Limit (mg/kg)	MSW Type I TCLP Limit (mg/L)	Hazardous Waste TCLP Limit (mg/L)
Benzene	10	0.5	0.5
Arsenic	36	1.8	5.0
Barium	2,000	100	100
Cadmium	10	0.5	1.0
Chromium	100	5.0	5.0
Lead	30	1.5	5.0
Mercury	4	0.2	0.2
Selenium	20	1.0	1.0
Silver	100	5.0	5.0

There are additional constituent analyses that can limit the options for disposal into an MSW Type I landfill unit:

- TPH < 1,500 mg/kg may be disposed of in a standard MSW Type I landfill unit.
- TPH ≥ 1,500 mg/kg may be disposed of in an MSW Type I landfill with a Class 1 industrial unit as specified in 30 TAC 330.171(b)(4).
- PCBs ≥ 50 mg/kg may not be disposed of in an MSW Type I landfill unit, unless authorized by the USEPA as specified in 40 Code of Federal Regulations Part 761.
- NORM concentrations must be below 30 picocuries per gram for disposal in an MSW Type I landfill unit as specified in 25 TAC 289.259(d)(1)(A).

## Explanation of Acronyms:

BTEX benzene, toluene, ethylbenzene, and xylene

COC constituents of concern

MSDS material safety data sheet

MSW municipal solid waste

NORM naturally occurring radioactive materials

PCBs polychlorinated biphenyls

RCRA Resource Conservation and Recovery Act

RRCT Railroad Commission of Texas

TCEQ Texas Commission on Environmental Quality

TCLP Toxicity Characteristic Leaching Procedure

TPH total petroleum hydrocarbons

## **Regulatory References:**

16 TAC 3.30

30 TAC 330.3(148) and 330.171

30 TAC 335.505(1) and 335.521(a)(1)

40 CFR 261.4(b)(5)

**RG-022**

**GUIDELINES FOR THE CLASSIFICATION & CODING OF INDUSTRIAL & HAZARDOUS WASTE**



GUIDELINES



FOR THE

CLASSIFICATION



AND

CODING



OF

INDUSTRIAL



AND

HAZARDOUS WASTES



TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

WASTE PERMITS DIVISION

RG-022 Revised 11/14



# GUIDELINES FOR THE CLASSIFICATION AND CODING OF INDUSTRIAL AND HAZARDOUS WASTES

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THIS IS A GUIDANCE DOCUMENT AND SHOULD NOT BE  
INTERPRETED AS A REPLACEMENT TO THE RULES.

The rules for classifying and coding industrial wastes and  
hazardous wastes may be found in 30 Texas Administrative  
Code (TAC) Sections (§§) 335.501-.521 (Subchapter R).

Prepared by:

I&HW Permits Section, MC 130  
Waste Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

RG-022

Texas Commission on Environmental Quality



**Bryan W. Shaw, Ph.D., P.E.,** *Chairman*  
**Toby Baker,** *Commissioner*  
**Zak Covar,** *Commissioner*

**Richard A. Hyde, P.E.,** *Executive Director*

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Published and distributed  
by the  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

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# Introduction

## Who Should Read This Booklet

The main purpose of this guidance document is to help generators of industrial and hazardous waste follow state and federal requirements on

- classifying and coding these wastes,
- keeping proper records, and
- notifying the Texas Commission on Environmental Quality (TCEQ) about the wastes, when required.

Specifically, this document gives guidance on the regulations in Title 30 of the Texas Administrative Code (TAC), Chapter 335, Subchapter R (Waste Classification). The rules in Subchapter R apply both to wastes generated in Texas and to those generated outside the state and sent to Texas for treatment, storage, and/or disposal. Correct and timely compliance with the regulations on industrial and hazardous wastes helps to protect the state's environment and safeguard the health of Texas citizens.

## Waste Classes

Figure 1-1 shows the main categories of hazardous and nonhazardous waste. The following paragraphs give brief descriptions of these categories—important terms that will be used throughout this booklet. (For more details, see the classification checklist in Chapter 3 and the definitions in Chapter 8.)

### Hazardous Waste

A hazardous waste is one that is listed as such by the U.S. Environmental Protection Agency (EPA) or that exhibits one or more hazardous characteristics (also as specified by the EPA). Hazardous wastes are threatening to human health and the environment.

### Listed Hazardous Waste

EPA lists over 400 wastes as hazardous. For more information see Part I-A of the checklist in Chapter 3.

### Characteristically Hazardous Waste

Waste that displays one or more of four hazardous characteristics:

- ignitability (easily flammable—for example, solvents);
- reactivity (capable of rapid chemical reaction—for example, peroxides);

- corrosivity (highly acidic or alkaline, able to dissolve metals or burn the skin—for example, hydrochloric acid or sodium hydroxide); and
- toxicity (a waste that can release toxic constituents into the environment—for example, lead-based paint).

For more information on hazardous characteristics, see Part I-B of the checklist in Chapter 3.

### Nonhazardous Waste

Any industrial waste that is not listed as hazardous and does not have hazardous characteristics.

(Class 1 nonhazardous industrial waste can include certain levels of constituents and specified properties that, at higher levels, might otherwise render the waste hazardous—see Part II of the checklist in Chapter 3.)

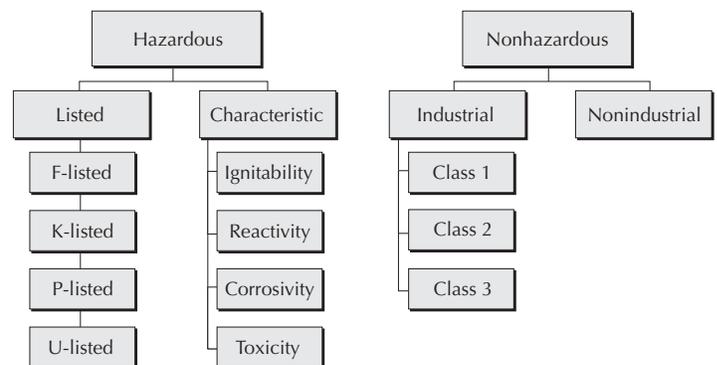
### Industrial versus Nonindustrial Wastes

*Industrial wastes* result from (or are incidental to) operations of industry, manufacturing, mining, or agriculture—for example, wastes from power generation plants, manufacturing facilities, and laboratories serving an industry. *Nonindustrial wastes*, by contrast, come from sources such as schools, hospitals, churches, dry cleaners, most service stations, and laboratories serving the public.

### Nonhazardous Industrial Waste

In this grouping, *Class 1* waste is considered potentially threatening to human health and the

Figure 1-1. Hazardous and Nonhazardous Wastes



environment if not properly managed, because of the constituents and properties this class can include. Therefore, there are special handling requirements for Class 1 wastes. An example is water contaminated with ethylene glycol.

Examples of *Class 2* wastes include waste-activated sludge from biological wastewater treatment. *Class 3* includes materials such as demolition debris—for example, bricks—that are insoluble, do not react with other materials, and do not decompose. Class 2 and 3 wastes are often accepted by local landfills. However, a Class 2 or 3 designation does not mean that the waste is incapable of causing harm in every management (or mismanagement) situation.

## What This Booklet Explains How to Do

After you have worked through this booklet (and that includes consulting the rules referred to in it), you will be able to accomplish the following tasks:

- **Identify which wastes you must classify, code, and notify** the TCEQ about. Chapter 2 introduces a key concept—“waste streams”—that helps you decide these points.
- **Classify your waste.** Chapter 3 gives you a step-by-step approach for putting your waste into one of four categories: either *hazardous* waste or *nonhazardous* industrial waste Classes 1, 2, or 3.
- Know what kind of information (either from **process knowledge** about your facility’s operation or from **analytical testing**) that you must **document** and keep on **file** (Chapter 4).
- **Understand the 8-character Texas waste code.** Chapter 5 explains the components of the waste code:
  - 4-character **sequence number** (may be a number, letters, or a combination; generally, identifies a particular waste or where it came from);
  - 3-digit **form** code; and
  - 1-character classification (from Chapter 3).
- **Know how to notify TCEQ** about your wastes and **which TCEQ form** to use (Chapter 6).

## Some Things This Booklet Does NOT Cover

**Nonhazardous Nonindustrial Waste.** The rules in 30 TAC Chapter 335, *do NOT* apply to **nonhazardous** waste generated by **nonindustrial** facilities.

### Selective Coverage of Chapter 335

Also, please be aware that this guidance document only covers 2 subchapters (A and R) of 30 TAC Chapter 335, which contains 18 subchapters in all. This booklet covers only classification and coding, documentation you must create and keep on file, and notifications you must send to TCEQ (and the forms to use for that purpose). This booklet is not a substitute for the complete rules themselves. (You can obtain your own copies of the full, official state rules from the TCEQ’s publications unit. Ways to contact this unit are listed under the heading “TCEQ and EPA Forms” in Chapter 6.)

### Classification versus Risk Reduction

There is an important distinction between (1) classifying your wastes; and (2) meeting the **risk reduction standards**, which are set forth in 30 TAC Chapter 335, Subchapter S. Here are the most common situations where the risk reduction standards apply:

- a facility that handled industrial wastes is being closed;
- a site where unauthorized discharge of wastes occurred is being cleaned up.

If you are involved in a situation like these, you need to inform yourself about the risk reduction standards. The guidance document you are now reading does not cover this topic. (Again, you can obtain a copy of Subchapter S, and other information, from the TCEQ publications unit—see the heading “TCEQ and EPA Forms” in Chapter 6.)

## Who Are “You” in This Booklet?

Throughout this guidance document, generators of industrial and/or hazardous wastes will be referred to as “generator,” “generators,” or—for a more direct way of writing—simply as “you.” Also, 30 TAC Chapter 335, Subchapter R, will be referred to as “these rules” or “the rules.” Finally, “this booklet,” “this document,” or “this guidance document” refers to *Guidelines for the Classification and Coding of Industrial and Hazardous Wastes*, TCEQ Publication Number RG-022—the booklet you are now reading.

# “Waste Streams”—A Key Concept

When the preceding chapter mentioned that this booklet will instruct you on how to classify, code and report about wastes, a question that naturally might have come to your mind is “*How* do I know which wastes must be classified, coded, and reported?” (The general answer is that you must perform these processes on all hazardous wastes and nonhazardous industrial wastes.)

In discussing this point, federal regulators use the term *waste stream*, in both of the following senses: First, it can mean the total flow of all waste from homes, businesses, and industry. Second, within this total flow, smaller “waste streams” can be distinguished—for example, “the residential waste stream,” “the recyclable waste stream,” and others.

Similarly, within the overall flow of waste from your ordinary operations or processes, a number of particular waste streams can be identified. For example if your process ordinarily produces a hazardous acidic waste, and at some point you neutralize that waste, these are two separately identifiable “waste streams.”

Each waste stream—the acidic waste and the neutralized waste, in this example—must be identified by an 8-character Texas waste code, which identifies the waste stream as a separate entity and gives information about its origin, general nature, and hazardous status. (Chapters 3 through 5 go into the details of how this 8-character code is arrived at.)

Table 2-1 gives examples of some situations in which the waste flow from an operation or process can produce more than one waste stream, each of which must be classified and coded; and an example of a situation that does *not* result in more than one waste stream. For specific guidance on specific waste streams, contact the TCEQ.

In general, whenever you have or suspect the existence of an additional, distinct waste stream, you must determine its classification (Chapter 3), arrive at a Texas waste code for it (Chapter 5), and in most cases notify TCEQ about the additional waste stream (Chapter 6—which also gives details about some of the exceptions to the requirements for notification: for example, a slight change or variation in a waste stream’s composition may not require notification.)

**Table 2-1. An Operation’s Overall Waste Flow Can Produce Multiple “Waste Streams”**

IF you have WASTES that are ...	AND they come from PROCESSES that are ...	THEN the wastes are considered ...
different	similar	<b>different</b> “waste streams”—for example, a sludge removed from an electroplating vat is not the same waste stream as a liquid removed from an electroplating vat.
similar	different	<b>different</b> “waste streams”—for example, methylene chloride used in a paint- stripping operation is not the same waste stream as methylene chloride used in laboratory analysis.
similar	similar	<b>the same</b> “waste stream”—for example, a site may have several paint booths that perform the same activities with the same materials, and each produces drop cloth waste. These drop cloth wastes, from the various locations at this site, could be considered one waste stream as long as they were all classified the same (for more on classification, see Chapter 3).
altered physically or chemically by treatment	N/A	<b>different</b> “waste streams”—for example, if a sludge is dewatered, it may produce two new waste streams, one a solid and the other a liquid.

# Waste Classification Checklist

---

This chapter provides a checklist to help you classify your hazardous waste and your nonhazardous industrial waste. For an overview of these types of waste, refer back to Figure 1-1 in Chapter 1; for more details, refer to 30TAC Chapter 335 Subchapter R Sections 335.501–508. (You can obtain your own copy of state rules from the TCEQ publications unit; ways to contact this unit are listed under the heading “TCEQ and EPA Forms” in Chapter 6.)

## Process Knowledge vs. Analytical Testing

In determining a waste stream’s classification, a generator may use *process knowledge* and/or *analytical testing*. Process knowledge is the owner or operator’s knowledge about how the facility operates, how a waste was produced and handled, and other information based on operating experience. Analytical testing is information about a waste from laboratory analysis.

In the checklist, the nonhazardous classification criteria that could involve analytical testing have been marked with an \*. This marking **does not** mean that analytical testing is the only way to evaluate these criteria. If sufficient process knowledge is available, little or no analysis may need to be performed. You should evaluate whether you have enough process knowledge about the waste to classify it or whether analytical testing is needed.

## Documentation

Regardless of whether you rely on process knowledge or opt for analytical testing, you must fully document the information used in making your waste classification. **A completed checklist does not qualify as full documentation.** Documentation should be in a written and/or electronically stored format that is reasonably accessible and easily reproducible. For details on documentation requirements, see Chapter 4.

---

## Part I. Hazardous Waste Determination

All waste generators should work through Part I of this checklist. In this part you will determine whether your waste is hazardous because (a) it is listed as hazardous by EPA or (b) it displays characteristics that EPA says make it hazardous.

In federal regulatory language, the first step in classifying your waste is called “making a *hazardous waste determination*.” The definition of hazardous waste, based upon the Resource Conservation and Recovery Act (RCRA), is found in Title 40 of the Code of Federal Regulations (CFR), Part 261.

This TCEQ guidance document reflects the hazardous waste definition in the *Federal Register* as of July 1, 2004. If that definition changes, the generator is still responsible for making an accurate hazardous waste determination in accordance with the latest regulations—instead of with what is printed in this guidance document.

IF the answer to any of the questions in Part I is “Yes,”  
THEN the waste is hazardous.

## Possible Exclusions from Hazardous Classification

Under certain conditions, some types of wastes are excluded from being considered hazardous (40 CFR Sections 261.3–4). Generators may wish to review these exclusions before working through Part I of this checklist.

---

## Part I-A. *Listed Hazardous Waste Determination*

The EPA lists some 400 hazardous wastes.

### Information to Help You Make This Determination

Descriptions of listed waste are found in 40 CFR Part 261, Subpart D, Sections 261.31–33. These wastes are often referred to as follows:

- “F” listed waste (waste from nonspecific sources, Section 261.31);
- “K” listed waste (wastes from specific sources, Section 261.32);
- “P” listed waste (unused acutely hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33);
- “U” listed waste (unused toxic hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33).

**QUESTION:** Is the waste a listed hazardous waste, or is it mixed with or derived from one?  Yes  No

---

## Part I-B. *Characteristic Hazardous Waste Determination*

Wastes may be hazardous if they display any of four characteristics: ignitability, corrosiveness, reactivity, or toxicity.

### Information to Help You Make This Determination

#### Ignitability

Wastes that are hazardous because they may ignite include the following:

- Liquid wastes (other than those aqueous waste containing less than 24 percent alcohol by volume) that have a flash point less than 60°C (140°F). (The test method is the Pensky-Martens closed cup tester, using the test method specified in ASTM Standard D-93-79 or D-93-80, or a Setaflash closed cup tester, using the test method specified in ASTM Standard D-3278-78.)
- Nonliquid wastes that, under standard temperature and pressure, are capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.
- Wastes that meet the definition of an ignitable compressed gas (see 49 CFR Section 173.300).
- Wastes that meet the definition of an oxidizer (see 49 CFR Section 173.151).

**QUESTION:** Is the waste ignitable according to 40 CFR Section 261.21?  Yes  No

---

#### Corrosiveness

Wastes that are hazardous because they are corrosive include the following:

- aqueous wastes with a pH of 2 units or below or of 12.5 units or above;
- liquid wastes that corrode steel at a rate greater than 6.35 mm (0.250 inches) per year.

**QUESTION:** Is the waste corrosive according to 40 CFR Section 261.22?  Yes  No

---

## Reactivity

A waste is considered reactive if it meets any of the following conditions:

- It is capable of detonation or explosive decomposition or reaction
  - at standard temperature and pressure,
  - if subjected to a strong ignition source, or
  - if heated under confinement.
- When mixed with water, it is
  - potentially explosive,
  - reacts violently, or
  - generates toxic gases or vapors.
- If a cyanide or sulfide-bearing waste is exposed to pH conditions between 2 and 12.5, it can generate enough toxic gases, vapors, or fumes to present a danger to human health or the environment. Generally, if a waste generates **250** ppm or more of reactive cyanides or **500** ppm or more of reactive sulfides, it is considered a reactive waste. (It should be noted that these levels of reactive compounds are just guidance. Each waste must be evaluated for reactivity on a case-by-case basis).
- It is normally unstable and readily undergoes violent change without detonating.
- It is a forbidden explosive (as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53).
- It is a Class B explosive (see 49 CFR Section 173.88).

**QUESTION:** Is the waste reactive according to 40 CFR Section 261.23?

Yes  No

## Toxicity

A waste is toxic if the toxicity characteristic leaching procedure (TCLP) shows that a representative sample from the waste contains one or more constituents at or above the levels listed in Table 3-1. The TCLP is described in EPA Method 1311 (SW-846).

**QUESTION:** Is the waste toxic according to 40 CFR Section 261.24?

Yes  No

**Table 3-1. TCLP Regulatory Levels**

arsenic — 5.0 mg/l	1,4-dichlorobenzene — 7.5 mg/l	nitrobenzene — 2.0 mg/l
barium — 100.0 mg/l	1,2-dichloroethane — 0.5 mg/l	pentachlorophenol — 100.0 mg/l
benzene — 0.5 mg/l	1,1-dichloroethylene — 0.7 mg/l	pyridine — 5.0 mg/l
cadmium — 1.0 mg/l	2,4-dinitrotoluene — 0.13 mg/l	selenium — 1.0 mg/l
carbon tetrachloride — 0.5 mg/l	endrin — 0.02 mg/l	silver — 5.0 mg/l
chlordane — 0.03 mg/l	heptachlor (and its epoxide) — 0.008 mg/l	tetrachloroethylene — 0.7 mg/l
chlorobenzene — 100.0 mg/l	hexachlorobenzene — 0.13 mg/l	toxaphene — 0.5 mg/l
chloroform — 6.0 mg/l	hexachlorobutadiene — 0.5 mg/l	trichloroethylene — 0.5 mg/l
chromium — 5.0 mg/l	hexachloroethane — 3.0 mg/l	2,4,5-trichlorophenol — 400.0 mg/l
o-cresol — 200.0 mg/l	lead — 5.0 mg/l	2,4,6-trichlorophenol — 2.0 mg/l
m-cresol — 200.0 mg/l	lindane — 0.4 mg/l	2,4,5-TP (Silvex) — 1.0 mg/l
p-cresol — 200.0 mg/l	mercury — 0.2 mg/l	vinyl chloride — 0.2 mg/l
cresol — 200.0 mg/l	methoxychlor — 10.0 mg/l	
2,4-D — 10.0 mg/l	methyl ethyl ketone — 200.0 mg/l	

---

## Review of Checklist Part I: Hazardous Waste

IF the answer to any of the preceding questions in Part I is “Yes,”  
THEN the waste is HAZARDOUS; PROCEED to Chapter 4.

IF the answers are “No” to all the preceding questions,  
AND the waste is NONINDUSTRIAL,  
THEN STOP here.

IF the answers are “No” to all of the preceding questions,  
AND the waste is INDUSTRIAL,  
THEN PROCEED to Part II.

---

## Part II: Nonhazardous Industrial Waste Classes 1 & 2

The determination in this part of the checklist applies only to nonhazardous industrial waste—see Figure 1-1 in Chapter 1. (This part of the checklist is based on regulations found in 30 TAC Sections 335.505–06 and 335.508).

IF the answer to any of the **un-numbered** questions  
in this part of the checklist is “Yes,”  
THEN the nonhazardous industrial waste is a Class 1 waste.

IF all the answers to the **un-numbered** questions in this part are “No,”  
THEN the industrial waste is a Class 2 waste.

---

### Generator’s Self-Classification

QUESTION: Has the generator chosen to classify its nonhazardous waste as Class 1?  Yes  No

---

### Container Waste

IF the waste is a container, greater than 5 gallons  
in holding capacity, which has held

- a hazardous substance (as defined in 40 CFR Part 302 and listed in Appendix A of this guidance document),
- a hazardous waste (including acutely hazardous wastes),
- a Class 1 waste, and/or
- a material that would be classified as a hazardous or Class 1 waste if disposed of,

THEN answer questions 1 and 2. *(Please note that containers that have held acutely hazardous wastes must be triple-rinsed before they can be classified as empty).*

IF these conditions are not present in your situation,  
THEN proceed to the next un-numbered question.

1. Has the container had all its residues removed?  Yes  No
2. Has the container been rendered unusable?  Yes  No

QUESTION: Are **any** of the answers to questions (1) or (2) above “NO”?  Yes  No

---

---

## Regulated Asbestos-Containing Material (RACM)

(See Chapter 8, Definition of Terms, for information on RACM.)

**QUESTION:** Does the waste contain asbestos material identified as RACM, as defined in 40 CFR Part 61? \*

Yes  No

---

## Polychlorinated Biphenyls (PCBs)

**QUESTION:** Is the waste contaminated by a material that originally contained 50 or more parts per million (ppm) total PCBs? \*

Yes  No

**QUESTION:** Does the waste contain 50 or more ppm PCBs?\*

Yes  No

---

## Petroleum Substance Waste

1. Is your waste specifically identified as a *petroleum substance* (see Chapter 8, Definitions of Terms) or contaminated with a material identified as a petroleum substance waste?  Yes  No
2. Does the waste contain more than 1,500 ppm total petroleum hydrocarbons (TPH)?  Yes  No

**QUESTION:** Are the answers to **both** of the numbered questions above “Yes”? (If one or both of the answers are “No,” enter “No” for this question.)

Yes  No

---

## “New Chemical Substance”

See “new chemical substances wastes” in Chapter 8, Definitions and Terms, for a description of how this particular type of waste may be classified as Class 2 or 3.

**QUESTION:** Is the waste from the production of a “new chemical substance,” as defined by the federal Toxic Substances Control Act, 15 U.S.C.A. Section 2602(9)?

Yes  No

---

## Out-of-State Origin

See “wastes generated out-of-state” in Chapter 8, Definitions of Terms, for details on how this particular type of waste may be classified as Class 2 or 3.

**QUESTION:** Is the waste generated outside Texas?

Yes  No

---

## Constituent Levels and Specified Properties for Nonhazardous Industrial Class 1 Wastes

**QUESTION:** If the waste is a liquid, does it have a flash point of less than 65.6°C (150°F)? \*

Yes  No

**QUESTION:** Is the waste a solid or semi-solid that—under conditions normally encountered in storage, transportation, and disposal—

- is liable to cause fires through friction or through retained heat from manufacturing or processing; or
- can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

Yes  No

**QUESTION:** Is the waste a semi-solid or solid that, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution with a pH of 2 or less or 12.5 or more?

Yes  No

**(Exception:** for solidified, stabilized, encapsulated, or otherwise chemically bound wastes, an exception is provided in 30 TAC Section 335.505(3)) \*

**QUESTION:** Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the toxicity characteristic leaching procedure (TCLP)? \*

Yes  No

(For a copy of Table 1, Appendix 1, see Appendix C of this guidance document.)

(Where matrix interferences of the waste cause the Practical Quantitation Limit (PQL) of the specific analysis to be greater than the Maximum Concentration listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R, then the achievable PQL becomes the Maximum Concentration, provided that the generator maintains documentation that satisfactorily demonstrates to the TCEQ that lower levels of quantitation of a sample are not possible.)

A satisfactory demonstration includes the results from the analysis of the waste for that specific constituent by a laboratory using an appropriate method found in *Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods* (EPA SW-846); *Methods or Chemical Analysis of Water and Wastes* (EPA-600 series); *Standard Methods for the Examination of Water and Wastewater*; *American Society for Testing and Materials (ASTM) Standard Methods*; or an equivalent method approved by the TCEQ.

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### Lack of Class 2 or 3 Information

**QUESTION:** Is information lacking that demonstrates the waste belongs in Class 2 or 3?

Yes  No

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### Review of Checklist Part II: Class 1 or 2 Nonhazardous Industrial Waste

IF the answer to any of the preceding  
**un-numbered** questions in Part II is "Yes,"  
THEN the nonhazardous industrial waste is a Class 1 waste.  
PROCEED to Chapter 4.

IF the answers are "No" to all the preceding  
**un-numbered** questions in Part II,  
THEN the industrial waste is a Class 2 waste.  
PROCEED to Chapter 4.

IF the answers are "No" to all of the preceding  
**un-numbered** questions in Part II,  
AND the industrial generator wishes to evaluate  
the waste for a possible Class 3 status,  
THEN PROCEED to Part III.

---

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## Part III: Nonhazardous Industrial Class 3 Waste

This part of the checklist applies only to nonhazardous, industrial waste that does not meet the definition of a Class 1 waste and is not specifically identified as a Class 2 waste. (The corresponding regulations for this part of the checklist can be found in 30 TAC Sections 335.507 and 335.508.)

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### Part III-A. Initial Determinations for Class 3 Status

IF the answer to any of the following questions in Part III-A is “Yes,”  
THEN the nonhazardous, industrial waste **cannot** be considered a Class 3 waste.

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#### Containers

QUESTION: Is the waste an empty container?  Yes  No

---

#### Medical Waste

(For a definition, see “medical wastes” in Chapter 8.)

QUESTION: Is the waste a medical waste regulated under 30 TAC Chapter 330, Subchapter Y?  Yes  No

---

#### Distilled Water Leaching Test

QUESTION: When subjected to the 7-day distilled water leaching test, does the waste leach constituents at or above the maximum contaminant levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335, Subchapter R? \*

Yes  No

(Table 3 is reproduced in Appendix D of this guidance document.)

---

#### Toxicity Characteristic Leaching Procedure

QUESTION: When submitted to the toxicity characteristic leaching procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels? \*

Yes  No

(The list of Class 1 toxic constituents is reproduced in Appendix E of this guidance document.)

*Exclusion:* Excluded from this list of Class 1 toxic constituents are those addressed in the previous question (that is, constituents identified in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R).

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#### Petroleum Hydrocarbons

QUESTION: Does the waste contain detectable levels of petroleum hydrocarbons (Method 1005)? \*

Yes  No

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#### Polychlorinated Biphenyls (PCBs)

QUESTION: Does the waste contain detectable levels of PCBs? \*

Yes  No

---

#### Decomposition

QUESTION: Is the waste readily decomposable?

Yes  No

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## Review of Checklist Part III-A: Class 3 Nonhazardous Industrial Waste

IF the answer to any of the preceding questions in Part III-A is "Yes,"  
THEN the nonhazardous, industrial waste **cannot** be considered a Class 3 waste.

IF all the answers to the preceding questions in Part III-A are "No,"  
THEN proceed to Part III-B to continue the waste's evaluation for possible Class 3 status.

---

## Part III-B: Final Determinations for Class 3 Status

### Inertness

**QUESTION:** Is the waste inert? (Inertness refers to chemical inactivity of an element, a compound, or a waste.)

Yes  No

---

### Insolubility

**QUESTION:** Is the waste essentially insoluble?  
(*Note:* wastes that contain liquids are *NOT* considered insoluble.)

Yes  No

---

## Review of Checklist Part III

IF the answer to any question under Part III-B is "No,"  
THEN the nonhazardous, industrial waste **cannot** be considered a Class 3 waste.

IF all the answers to the questions in Part III-A are "No,"  
AND all the answers to the questions in Part III-B are "YES,"  
THEN the nonhazardous industrial waste is a Class 3 waste.

---

## Part IV. Variance from Waste Classification

The TCEQ may determine, on a case-by-case basis, the merits of a variance request for a specific nonhazardous classification. The burden of justifying the need for a variance is on the requestor. The requestor must submit information sufficient to clearly indicate the issues involved, the reason(s) for the request, and both the positive and negative impacts that may result from the granting of the variance. (The regulations corresponding to these types of variance requests can be found in 30 TAC Section 335.514, Variance from Waste Classification Provisions.)

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\* **As a reminder**, these characteristics need not necessarily be addressed by analytical testing. A generator may be able to address them through process knowledge. For more information on process knowledge, please see Chapter 4 of this guidance document.

# Process Knowledge, Analytical Testing, and Documentation Requirements

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## Introduction

Now that you know how to classify your wastes, you are ready to compile supporting documentation. Documentation should support the classification and coding of a waste stream. You must properly document each waste stream generated by the facility, and keep that documentation for at least three years after the waste is no longer generated, stored, or recycled or until the site is closed.

The regulations on documentation requirements can be found in 30 TAC Section 335.9 (Record Keeping and Annual Reporting Procedures Applicable to Generators), Section 335.70 (Record Keeping), Section 335.510 (Sampling Documentation), Section 335.511 (Use of Process Knowledge), and Section 335.513 (Documentation Required).

The TCEQ randomly audits a portion of waste stream *notifications* (see Chapter 6) in order to ensure proper classification and coding of waste in Texas. When the TCEQ sends you a request for information for the purpose of an audit, you must send the agency the information that you have gathered to make your hazardous waste determination/waste classification. Please use Chapter 4 as a guide to compiling supporting documentation for each waste stream generated at your facility.

## Process Knowledge

If process knowledge is used in classifying a waste, that knowledge must be documented and kept on file for three years. Process knowledge must be in writing or stored in some electronic form. It cannot be stored solely in someone's mind. The process knowledge must support a generator's reasoning about why the waste has been given a particular classification. It must also support the generator's reasoning about why a particular test method was not performed.

The following are some examples of process knowledge that may assist in classifying waste:

- description of the waste;
- date of initial waste generation;

- a detailed description of the process generating the waste (that is, identification of chemicals or other materials in the process that generated the waste stream (including any potential breakdown products));
- manufacturer's literature such as Material Safety Data Sheets—MSDSs (although they were not created for the purpose of determining Texas waste classification, and do not contain information on all constituents found in a product, MSDSs may be helpful);
- full description of activities that generated the waste stream;
- identification of potential contaminants; and
- other documentation generated in conjunction with the particular process.

## Analytical Data

If a generator uses analytical data to classify a waste, the data must be supported by documentation of the sampling procedure and the analytical testing. The following lists specify information that must be maintained when analytical data is used for classification purposes.

## Sampling Procedures

The following procedures must be documented:

- dates of sample collection;
- description of the site and/or unit from which the sample was taken, including sampling locations;
- the method and equipment used for sampling;
- a description of the sampling techniques, including collection, containerization, and preservation; and
- rationale—that is, supporting reasons—for the sampling plan (why the number, type, and location of samples taken accurately represent the waste stream being characterized).

## Analytical Testing

Documentation of analytical testing must include the following:

- Analytical **results** (including quality control data).
- Analytical **methods** (including any preparatory methods).
- The **detection limits** for each analysis.
- **Name of laboratory** performing the analysis.
- **Chain of custody**—documentation tracking the condition of the waste containers. For example, were the waste containers and their seal intact or broken upon arrival at the laboratory? Were the containers full, half-full, or empty? Did all the containers arrive at the laboratory or just a partial shipment?
- Documentation that satisfactorily demonstrates that lower levels of *quantitation* are not possible (this is only necessary when the waste media causes the *Estimated Quantitation Limit* (EQL) of a Class 1 toxic constituent (as listed in Appendix E of this guidance document) to be greater than the concentration listed (*matrix interference*). (Terms in italics are explained in Chapter 8.)

## Classification Checklist

Although the checklist in Chapter 3 can be used to help classify industrial and hazardous waste, a generator should support the checklist’s “yes” or “no” responses with process knowledge and/or analytical data. A completed checklist by itself is not sufficient documentation to submit to the TCEQ in response to a random audit of classification.

For example, a generator answers “no” to the question “Is the waste ignitable according to 40 CFR Section 261.21?” You can support this response by submitting process knowledge, analytical data, or both. If process knowledge is used, it must be **specific**. A general statement such as “the waste is not ignitable” would not be sufficient.

Instead, you should document specific actions you took and their results, such as (1) reviewed all constituents that may be present in the waste; (2) determined that each constituent present in the waste does not meet the definition of an ignitable waste; and (3) determined that the process generating the waste does not introduce any ignitable characteristics to the waste stream. You should keep copies of your documentation demonstrating that the constituents in the waste stream would not cause the waste to exhibit the characteristic of ignitability.

## Rule of Thumb about Documentation

Remember that documentation should demonstrate why a waste has been given a particular classification. Here’s a good rule of thumb: if someone else can review your classification documentation, using the published criteria and/or the checklist, and arrive at the same classification you did, then you have probably done a good job of compiling supporting documentation for a waste classification. On the other hand, if someone reviews your classification and still has unanswered questions, then you may want to gather additional documentation (from process knowledge and/or analytical data) to support your classification of that waste stream.

# Texas Waste Code Formula

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Chapter 5 describes the 8-digit Texas waste code that identifies each of your waste streams. (Part of the information to complete this waste code comes from the waste determination process (described in Chapter 3) and from the documentation you must compile and keep on hand (described in Chapter 4).)

The formula for the Texas waste code is given in Figure 5-1. The rules corresponding to this formula can be found in 30 TAC Section 335.503 (Waste Classification and Waste Coding Required).

## Sequence Number

Although called a sequence “number,” this part of the code may contain a mix of numbers and letters—alphanumeric; and sometimes it may consist of letters alone. Various types of 4-digit sequence numbers are used in the Texas waste code.

- An **arbitrary and unique 4-digit number from 0001 to 9999** (no alpha characters), which is assigned by the generator when adding a waste stream to Texas facility’s *Notice of Registration* (see Chapter 6, Notification Requirements). Once assigned to a particular waste stream, a sequence number **cannot be reassigned** to another waste stream. Generators need not sequentially assign sequence numbers to a facility’s waste streams.
- A **4-digit alphanumeric number** assigned by the TCEQ (under the **one-time shipment program**) to wastes generated by unregistered generators within Texas. (Spill waste not managed under the Emergency Response Program may be handled in this manner.)
- **“SPIL”** to be assigned only by the Emergency Response Team of the Field Operations Division **for spill wastes regulated under the Emergency Response Program.**
- **“OUTS”** to be used for **wastes generated outside of Texas.**
- **“CESQ”** to be used by **municipal hazardous and industrial CESQs** (Conditionally Exempt Small-Quantity Generators).
- **“TSDF”** (treatment, storage, and disposal facilities), to be used by facilities that

(1) receive and consolidate a waste stream with other like waste streams (thus not changing the form or composition of the waste); or (2) store a received waste without treating or changing its form or composition. This sequence number does not apply to wastes that are treated or altered in some other way. The “TSDF” designation is to be used only by **facilities that store and/or accumulate waste** from more than one site for subsequent shipment to a treatment or disposal facility.

## Form Code

The second series of numbers found in the Texas waste code is the “form code.” The list of form codes as well as flowcharts that depict the choosing of a form code can be found in Appendix G.

Form codes are broken down into 10 major categories. They are Lab Packs, Inorganic Liquids, Organic Liquids, Inorganic Solids, Organic Solids, Inorganic Sludges, Organic Sludges, Inorganic Gases, Organic Gases, and Plant Trash. The various form codes and corresponding descriptions can be found under these categories in Appendix G.

In determining a waste stream’s form code, TCEQ recommends that the generator first determine the major category into which the waste stream fits. Then review all the form code descriptions in that category to determine which code or codes best describe your waste stream. From this narrowed-down list, choose a form code for the waste stream.

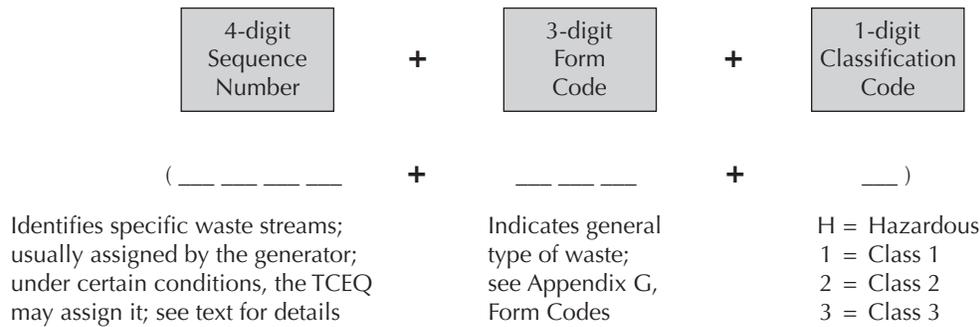
## Classification

The waste stream’s classification completes the Texas waste code. As Figure 5-1 showed, this part of the Texas waste code will be “H” or “1”, “2”, or “3”.

### **Stop! Are You about to Misclassify a Waste?**

Table 5-1 provides additional information about using certain combinations of form and class codes.

**Figure 5-1. Components of a Texas Waste Code**



**Table 5-1. Questions to Ask about Some Combinations of Coding and Classification**

IF the waste is ...	AND you assigned form codes ...	Are you sure about a classification of ...
Any Class 3 waste	Any form code	<i>Class 3?</i> (You must submit all supporting documentation)
Asbestos solids, debris, slurry, sludge, etc.	311, 515	<i>Class 2?</i> (Wastes that contain regulated asbestos-containing material are Class 1)
Oils	205, 206 <sup>a</sup>	<i>Class 2?</i> (Wastes that contain more than 1,500 ppm total petroleum hydrocarbons are Class 1)
PCB-containing materials	297, 298, 394, 395, 396, 397, 398, 399, 494, 495, 496, 497, 498, 499, 598, 599, 698, 699	<i>Class 2?</i> (Wastes that contain 50 ppm or more PCBs are Class 1)
Petroleum-containing materials	205, 206 <sup>a</sup> , 296, 489, 510, 603, 606, 695, 696	(Petroleum substance wastes that contain more than 1,500 ppm total petroleum hydrocarbons are Class 1)
Plant trash	902 and 999 <sup>b</sup>	<i>Hazardous, Class 1, or Class 3?</i> (Only wastes that are Class 2 may be given a form code for plant trash)
Spent lead acid batteries	309 <sup>c</sup>	Hazardous

<sup>a</sup> If your waste oil is nonhazardous, is managed under 40 CFR 279 and 30 TAC 324, and is recycled 100 percent, then do not add to your Notice of Registration (the central record that the TCEQ compiles from waste notifications you send in—see Chapter 6, Notification Requirements and Forms).

<sup>b</sup> Only form codes 902 and 999 may be used.

<sup>c</sup> If all your lead acid batteries are managed under the “universal waste” rule in 40 CFR Part 273, then do not add to your Notice of Registration.

# Notification Requirements and Forms

This chapter describes forms and supporting documentation you must send to the TCEQ to notify the agency about waste streams that you generate. The regulations on notification can be found in 30 TAC Section 335.6 (Notification Requirements), Section 335.502 (Conversion to New Waste Notification and Classification System), Section 335.508 (Classification of Specific Industrial Solid Wastes), Section 335.509 (Waste Analysis), and Section 335.513 (Documentation Required).

## Notifications about Industrial or Hazardous Waste

You must submit information about industrial or hazardous wastes no later than 90 days after the waste's initial generation and before handling, shipment, or disposal; use TCEQ form 00002 or the TCEQ State of Texas Environmental Electronic Reporting System (STEERS) software. (For information on obtaining TCEQ forms and how to access the STEERS information, see this chapter's section "TCEQ and EPA Forms.")

**Please Note:** All Large-Quantity Generators (LQG) **must** use STEERS to update their Notice of Registration (NOR). This requirement, effective December 15, 1997, is found in 30 TAC Section 335.6(b). Therefore, if you are a LQG and you need to update your NOR to replace inactivated waste code, please do so using STEERS.

The TCEQ uses the information submitted on these forms to create a record called the *Notice of Registration*, which contains site-specific waste management information about industrial and municipal hazardous waste generators in Texas.

## Notifications about New Chemical Substance Waste

For a Class 2 or Class 3 waste generated as the result of the production of a "new chemical substance" (see Chapter 8, Definitions of Terms), you must follow the instructions below:

- Give the TCEQ notice that the waste is from the production of a "new chemical substance."
- Submit all supporting reasons and documentation used in that waste's classification.

- Manage nonhazardous waste from the production of a "new chemical substance" as a Class 1 waste, unless you can provide appropriate analytical data and/or process knowledge demonstrating that the waste meets the definition of a Class 2 or Class 3, and the TCEQ concurs. (For definitions of Class 2 and 3, see Chapter 8 and the classification checklist in Chapter 3.)
- If you have not received concurrence or denial from the TCEQ within 120 days from the date of your request for review, you may manage the waste according to the requested classification, but you must give the TCEQ 10 working days written notice before managing the waste as a Class 2 or a Class 3.

## Notifications about Class 2 and Class 3 Out-of-State Waste

If you want to ship a nonhazardous waste into Texas, it is automatically considered a Class 1 waste (and expected to be managed as such) unless

- you request the TCEQ to review your waste classification documentation supporting a lower classification such as Class 2 or 3; and
- the TCEQ concurs with the lower classification.

After concurrence from the TCEQ you must comply with the lower classification's requirements on shipping, record keeping, and disposal of the waste. If, after review of your documentation, the TCEQ disagrees with your waste classification, you must continue managing the nonhazardous waste as Class 1 waste.

## Notifications about Other Industrial and Hazardous Wastes from out of State

Please note the following special requirements for the documentation of industrial and hazardous waste that is imported to Texas from foreign countries and other U.S. states.

- If out-of-state generators and importers of record want to bring hazardous waste into Texas, they must have an EPA Identification number. Generators and importers who do

- not have this ID number must obtain one from the EPA, using EPA Form 8700-12.
- Out-of-state generators or importers of record must fill out a Uniform Hazardous Waste Manifest (TCEQ-00311) and place their EPA ID number in Box 1 of this form.
- In Box B of the Uniform Hazardous Waste Manifest, use one of the generic numbers for identifying the country or state of origin. For example: F0061 for hazardous and or nonhazardous industrial waste imported from Mexico, D0022 for Louisiana (Appendix H gives these codes). For more information about manifesting imported industrial and hazardous waste, see 40 CFR 262.60 and 30 TAC 335.76 (d).
- OUTS must be used as the 4-digit sequence number of the Texas waste code in Box I of the manifest.

## Notifications about Alternate Analytical Methods

Generators who propose an alternate analytical method must validate their alternate method by demonstrating that it is equal to or superior in accuracy, precision, and sensitivity to the corresponding EPA-approved methods for analytical testing given in *Standard Methods for the Examination of Water and Wastewater*, SW-846, and EPA-600/4-79/020.

In making this demonstration, the generator must provide the TCEQ, at a minimum, the following documentation:

- a full description of the proposed method (including all equipment and reagents to be used);
- a description of type of waste and *waste matrices* to be analyzed (for definitions of terms in italics, see Chapter 8);
- comparative results of the proposed method and corresponding SW-846 or *ASTM* method;
- a complete assessment of interferences with the proposed method (see, for example, *matrix interference* in Chapter 8);
- a description of quality control procedures; and
- additional information as needed and/or requested by the TCEQ to adequately review the proposed alternate method.

## TCEQ and EPA Forms

### How to Order

Notification forms can be obtained in several ways:

- Contact the TCEQ regional office near you.
- On the Internet go to <[www.tceq.texas.gov](http://www.tceq.texas.gov)> and select the “Forms” link. Access the

Forms Database and type in the form number. (The instructions for form TCEQ-00002 are in a separate download file).

- Fax your order to 512-239-4488, or order forms by voice at 512-239-0028, the TCEQ’s publications unit. Be sure to give the form **numbers** that you want; this information will help the TCEQ get the correct form to you as quickly as possible.

### How to Access STEERS

State of Texas Environmental Electronic Reporting System (STEERS) information, including an application package, can be obtained as follows:

- on the Internet, go to <<https://www3.tceq.texas.gov/steers>>; or
- call the STEERS Help Line at 512-239-6925.

### Currently Available Forms

Notification forms available at the time of this printing include the following:

- The hazardous or industrial waste “**Initial Notification Form,**” used for initial notification about a site, and adding a waste stream to your Notice of Registration (see Chapter 6) or when recording a 6-digit waste code into one or more 8-digit waste codes. (form number: **TCEQ-00002**)
- The “**Hazardous or Industrial Waste Management Unit Form,**” used when adding information about a waste management unit to a Notice of Registration. (form number: **TCEQ-00002**)
- The “**Uniform Hazardous Waste Manifest,**” used by generators and transporters of hazardous waste and by owners or operators of hazardous waste treatment, storage, and disposal facilities for both inter- and intrastate transportation. (form number: **TCEQ-00311**—Only order form available on the Web)
- The “**One-Time Shipment Request ... for Shipment of Class 1, 2, 3 and EPA Hazardous Waste,**” used by unregistered generators, not by generators that already have a site’s Notice of Registration. (form number: **TCEQ-00757**)
- The EPA “**Notification of Regulated Waste Activity**” form, used when notifying EPA of a federally regulated hazardous waste activity—for example, the generation of hazardous waste. (form number: **EPA 8700-12**—Available on the Web as part of TCEQ-00002)

# Management of Mechanical Shredding Wastes

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The regulations on mechanical shredding waste can be found in 30 TAC Section 335.508 (Classification of Specific Industrial Solid Wastes).

Wastes generated by the mechanical shredding of automobiles, appliances, or other items of scrap, used, or obsolete metals are handled according to the provisions of the Texas Solid Waste Disposal Act, Health and Safety Code, Section 361.019 (Vernon Pamphlet 1992), until the TCEQ develops specific standards for the

classification of this waste and ensures adequate disposal capacity.

These provisions say that you can dispose of mechanical shredding wastes in a municipal landfill facility authorized to accept Class 1 and 2 industrial solid wastes, if the shredding waste:

- contains no free liquids, and
- is not a hazardous waste.

As mentioned earlier, TCEQ may establish other requirements.

# Definitions of Terms

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For readers' convenience, this chapter gives the full version of some abbreviations and brief descriptions of some important terms used in this guidance document. Full, official definitions can be found in the sources cited. Nothing in this chapter takes the place of any definitions in laws, rules, or regulations.

**Acutely hazardous wastes** (40 Code of Federal Regulations (CFRs) Parts 261.31–33 and subject to the exclusion established in 40 CFR Part 261.5: EPA hazardous waste numbers F020, F022, F023, F026, and F027)—A subset of *listed hazardous wastes* that carry the “H” code; they are considered very harmful to human health and the environment.

**ASTM**—American Society for Testing and Material

**CFR**—Code of Federal Regulations

**Characteristically hazardous waste** (40 CFR Part 261 Subpart C)—Any waste that exhibits the characteristics of ignitability, corrosivity, reactivity, and/or toxicity as defined by the EPA in 40 CFR Part 261 Subpart C. These are often referred to as the “D” wastes. (Also see Chapter 3 of this guidance document.)

**Class 1 waste** [30 TAC Section 335.1(14)]—Any waste or mixture of waste 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, disposed of, or otherwise managed. (The checklist in Chapter 3 takes you through the process of distinguishing hazardous waste from nonhazardous Class 1 waste.)

**Class 2 waste** [30 TAC Section 335.1(15)]—Any individual waste or combination of waste that cannot be described as hazardous waste or as nonhazardous Class 1 or Class 3 waste.

**Class 3 waste** [30 TAC Section 335.1(16)]—Waste that is *inert* and *essentially insoluble* (see definitions of terms in italics), usually including but not limited

to materials such as rock, brick, glass, dirt, certain plastics, rubber, and similar materials that are not readily decomposable.

**Classification code** (30 TAC Section 335.503)—This last digit of the Texas waste code represents the classification of the waste stream. The letter H represents hazardous wastes; and the number 1, 2, or 3 represents nonhazardous industrial waste Class 1, 2, or 3.

**Conditionally Exempt Small-Quantity Generator** (30 TAC Section 335.78)—Generators of less than 100 kg (220 lbs) per month of hazardous waste, or less than 1 kg (2.2 lbs) per month of *acutely hazardous waste* (see description of term in italics in this chapter).

**Essential insolubility** (30 TAC Section 335.507)—Is established when using:

- the Seven-Day Distilled Water Leachate Test, and the extract from the sample of waste does not leach greater than the Maximum Contaminant Level listed in Appendix 1, Table 3 of 30 TAC Chapter 335, Subchapter R;
- the test methods described in 40 Code of Federal Regulations Part 261, Appendix II, and the extract from the sample of waste does not exhibit detectable levels of the constituents found in Appendix 1, Table 1 of 30 TAC Chapter 335, Subchapter R;
- an appropriate test method, and a representative sampling of the waste does not exhibit detectable levels of total petroleum hydrocarbon (TPH); (“Petroleum substance wastes” are not subject to 30 TAC’s subsection on essential insolubility.)
- an appropriate test method, and a representative sampling of the waste does not exhibit detectable levels of polychlorinated biphenyls (PCBs).

**Form code** (30 TAC Section 335.503)—This code describes the general type of waste stream. It consists of three numbers, the 5th, 6th, and 7th digits in the Texas waste code (see Figure 5-1 in Chapter 5). More than one form code may apply to a particular waste stream.

**Hazardous substance** (30 TAC Section 335.508)—Any substance designated as “hazardous” in 40 CFR Part 302 (Table 302.4) including, but not limited to, waste designated as hazardous in the Resource Conservation Recovery Act (RCRA).

**Hazardous waste** (40 CFR 261.3.)—The EPA defines a waste as hazardous if it exhibits one or more of four hazardous “characteristics,” or if it is one of several hundred wastes “listed” as hazardous. For details, see Chapters 1 and 3 of this guidance document.

**Hazardous waste determination** (30 TAC Section 335.504)—An evaluation of a waste to determine whether it meets the RCRA definition of a hazardous waste.

**Inert** (30 TAC Section 335.507)—Inertness refers to the chemical inactivity of an element, compound, or waste. Ingredients added to mixtures chiefly for the purposes of bulk and/or weight are normally considered inert.

**Listed hazardous wastes** (40 CFR Part 261 Subpart D)—Specific wastes that have been identified by the EPA as hazardous. These are often referred to as the “F” wastes (waste from nonspecific sources); “K” wastes (wastes from specific sources); “P” wastes (acutely hazardous off-specification materials, container residues, and spill residues of these materials); and “U” wastes (toxic, hazardous off-specification materials, container residues, and spill residues).

A waste is considered hazardous if

- it is listed in 40 CFR Part 261 Subpart D, or
- is mixed with or derived from a waste listed there, and
- has not been provided a particular exclusion from the definition of hazardous as provided in 40 CFR Sections 261.3–4.

**Matrix interference**—Interference with the precision of analytical testing for a particular constituent in a waste stream due to other material(s) in the sample (contamination by carryover). See also waste matrices.

**Medical wastes** (30 TAC Section 335.508)—Nonhazardous medical wastes that are subject to the provisions of 30 TAC Chapter 330 Subchapter Y are designated as Class 2 wastes. An example of such waste would be needle-bearing syringes from plant infirmaries.

**“New chemical substance” waste** (30 TAC Section 335.508)—If a nonhazardous industrial waste is generated as a result of the commercial production of a “new chemical substance” as defined by the federal Toxic Substances Control Act, *United States Code Annotated* (U.S.C.A.), Title 15, Section 2602(9), the generator must manage that waste as a Class 1 waste, unless the generator can provide appropriate analytical data and/or process knowledge demonstrating that the waste is Class 2 or Class 3, and the TCEQ concurs. If the generator has not received concurrence or denial from the TCEQ within 120 days from the date of the request for review, the generator may manage the waste according to the requested classification, but not before giving 10 working days written notice to the TCEQ.

**Notice of Registration (NOR)**—TCEQ term for the information it collects in its database on each hazardous or industrial waste handler: generator, receiver, transporter, and recycler. The NOR includes the facility’s physical and mailing addresses, information on waste streams that are generated or handled at the site, a list of individual units at the facility where wastes are managed, and other information. It also contains the state facility identification numbers and the EPA facility number, issued by the TCEQ. The NOR serves to verify the information submitted by each handler. When a generator registers with the TCEQ using form TCEQ-00002, the agency sends back a printout of the information in its database about the site and generator. The handler should keep the NOR current and in on-site files and check it periodically to make sure that it accurately reflects the facility’s waste streams and waste management units.

**Petroleum-hydrocarbon-containing wastes** (30 TAC Section 335.508)—Wastes resulting from the cleanup of leaking underground storage tanks (USTs), which are regulated under 30 TAC Chapter 334 Subchapter K (relating to Petroleum Substance Waste), are not subject to classification under 30 TAC Chapter 335 Subchapter R (Waste Classification).

**Petroleum substance**—A crude oil, or any refined or unrefined fraction or derivative of crude oil, that is a liquid at standard conditions of temperature and pressure. These substances include the following:

- combinations or mixtures of basic petroleum substances, such as crude oils, crude oil fractions, petroleum feedstocks, and petroleum fractions;

- aviation gasolines, aviation jet fuels, distillate fuel oils, residual fuel oils, gas turbine fuel oils, illuminating oils, lubricants, building materials, insulating and waterproofing materials, used oils;
- solvents or a combination or mixture of solvents—except for any listed substance regulated as a hazardous waste under the federal Solid Waste Disposal Act, Subtitle C (*United States Code*, Title 42, Section 6921, et seq.)—that are liquid at standard conditions of temperature (20° centigrade) and pressure (1 atmosphere). Examples include Stoddard solvent, petroleum spirits, mineral spirits, petroleum ether, varnish makers’ and painters’ naphthas, petroleum extender oils, and commercial hexane.

The following materials are *not* considered petroleum substances:

- polymerized materials, such as plastics, synthetic rubber, polystyrene, high- and low- density polyethylene;
- animal, microbial, and vegetable fats;
- food-grade oils;
- hardened asphalt and solid asphaltic materials, such as roofing shingles, roofing felt, hot mix and cold mix; and
- cosmetics.

**Practical Quantitation Limits (PQLs)**—See quantitation.

**Process Knowledge**—See examples in Chapter 4 under this subheading.

**Quantitation**—Generally, measurement of quantity or amounts. The word appears in a number of specialized terms used in waste regulation:

- **Quantitation Limits (QLs)** indicate the levels at which measurements can be “trusted.”
- **Practical Quantitation Limits (PQLs)** and **Estimated Quantitation Limits (EQLs)** are levels that are routinely and reliably detected and quantitated in a variety of sample matrices. These are 3 to 5 times the Method Detection Limits (MDLs). (See Chapter 1, SW 846, 1992.)
- **Method Detection Limits (MDLs)** take into account the reagents, sample matrix, and preparation steps applied to a sample in specific analytical methods. (See 40 CFR Part 136, Appendix B; Chapter 1, SW 846, July 1992.)

**RCRA**—Resource Conservation and Recovery Act (amendment to the Solid Waste Disposal Act). Primarily designed to regulate five types of disposal activities: hazardous waste, solid waste, underground storage tanks, oil waste, and medical waste. In this guidance document, any mention of “RCRA” refers to RCRA Subtitle C, which applies to all handlers of hazardous waste, including generators; transporters; and operators of treatment, storage, and disposal (TSDF) facilities. (RCRA, a federal law, covers only whether a solid waste is either hazardous or nonhazardous. Texas regulations further subdivide nonhazardous waste into Classes 1, 2, and 3.)

**Regulated asbestos-containing material (RACM)** (30 TAC Sections 335.508)—RACM includes the following:

- **friable** asbestos containing more than 1 percent asbestos<sup>1</sup> that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure;
- **nonfriable** asbestos-containing material containing more than 1 percent asbestos as measured by the method found in 40 CFR Part 763, Subpart E, Appendix E, Section 1 that, when dry, *cannot* be crumbled, pulverized, or reduced to powder by hand pressure.
- **Category I** nonfriable asbestos includes packings, gaskets, resilient floor coverings, and asphalt roofing products);
- **Category II** nonfriable asbestos includes transite shingles, transite pipes, and any nonfriable asbestos material not defined as Category I.

**Regulated generators** (30 TAC Chapter 335 Sub-chapters A and C)—If you generate the following amounts of waste, you are a regulated generator and must follow regulations in Chapter 335:

Waste Type	Monthly Amount
Class 1	100 kg (220 lbs) or more
hazardous	100 kg (220 lbs) or more
acutely hazardous	1 kg (2.2 lbs) or more

If you generate less than the amounts shown above, you are considered a Conditionally Exempt Small-Quantity Generator and are not subject to regulations requiring notification, manifesting, and fees.

<sup>1</sup>As determined using the method specified in 40 CFR Part 763, Subpart E, Appendix E, Section 1, Polarized Light Microscopy.

**Sequence number** (30 TAC Section 335.503)—The first 4 digits of the waste code (actually these four characters may be numbers, letters, or a combination of the two). The sequence number is used as an internal numbering system determined by each generator. The number of a waste may range from 0001 to 9999, and can only be used once.

**Solid waste** (30 TAC Section 335.1 and 40 CFR Section 261.2)—Any discarded material such as garbage; refuse; sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility; or other material including solid, liquid, semisolid, or contained gaseous material resulting from industrial, municipal, commercial, mining, and agricultural operations. Solid wastes include any material that is abandoned by being disposed of; burned or incinerated; or accumulated, stored, or treated before or in lieu of these activities. Certain recycled materials are also considered wastes. Solid wastes are often referred to simply as “wastes.” For the complete definition of a “solid waste,” please refer to 30 TAC Section 335.1 (Solid Waste).

**Specific industrial solid waste** (30 TAC Section 335.508)—A nonhazardous waste for which specific classification criteria and/or a form code have been established.

**Stabilized wastes** (30 TAC Section 335.508)—Wastes that originally exhibit hazardous characteristics can be *stabilized* so that they are no longer hazardous and can meet the criteria for classification as Class 1 or 2 nonhazardous industrial waste. For example a waste containing lead that exhibits the hazardous characteristic of toxicity can be stabilized by mixing with cement in the proper proportion to reduce the toxicity or mobility of contaminants. Depending on the process(es) used, stabilization achieves varying degrees of long-term effectiveness.

**Synthetic oils**—Oils not derived from crude oil, including those derived from shale, coal, or a polymer-based starting material; and nonpolymeric synthetic fluids that are used as hydraulic fluids and heat transfer fluids, such as those based on phosphate esters, diphenyl oxide, or alkylated benzenes. Synthetic oils are generally used for the same purpose as oils, and they present relatively the same level of hazardousness after use.

**TAC**—Texas Administrative Code. Title 30 of TAC contains TCEQ rules on industrial solid waste and municipal hazardous waste, among other subjects.

**TSDF**—Treatment, storage, and disposal facilities.

**Universal Waste** (30 TAC Section 335.261 and 40 CFR Part 273)—This rule covers five types of waste:

- lamps as described in 40 CFR §273.5, and §335.261(b)(16)(F).
- mercury-containing thermostats as described in 40 CFR 273.4;
- all hazardous waste batteries as described in 40 CFR 273.2;
- some hazardous waste pesticides as described in 40 CFR 273.3;
- paint and paint-related waste as described in §335.262(b);

The rule establishes a reduced set of regulatory requirements for facilities managing universal waste, depending on whether the facility falls into one of four categories:

- small-quantity handler of universal waste (SQHUW),
- large-quantity handler of universal waste (LQHUW),
- transporter of universal waste, or
- final destination facilities.

In addition, the rules establish a petitioning procedure whereby additional wastes may be added to the universal waste rule.

**U.S.C.A.**—*United States Code Annotated.*

**Used oil** (30 TAC Section 335.1, 30 TAC Section 324 (relating to used oil), and 40 CFR Part 279 (relating to standards for management of used oil)<sup>2</sup>— Any oil refined from crude oil, or any synthetic oil, that has been used and, from such use, is contaminated by physical or chemical impurities and cannot be used for its intended purpose (that is, it is a spent material).

Used oil fuel includes any fuel produced from used oil by processing, blending, or other treatment.

**Waste**—Unwanted materials left over from a manufacturing process; refuse from places of human or animal habitation.

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<sup>2</sup> Rules applicable to nonhazardous used oil, are found in Chapter 324, state regulations on recyclable used oil, and 40 CFR Part 279, federal regulations on used oil recycling.

**Waste code**—Also referred to as Texas waste code (30 TAC Section 335.503)—This 8-digit code identifies a waste stream. The first 4 digits are the *sequence number*, the next 3 digits are the *form code*, and the last digit is the waste’s *classification* (sequence number + form code + classification code = waste code). (Some of the “digits” referred to here actually may be letters or a combination of letters and numbers.)

**Waste matrices**—Water and soil or sediment in which a waste is found.

**Wastes generated out-of-state** (30 TAC Section 335.508)—All nonhazardous industrial waste generated outside the state of Texas and transported into or through Texas for processing, storage, or disposal

is classified as Class 1 unless the waste satisfies the Class 2 or 3 criteria as defined in 30 TAC Sections 335.506–8. A Class 2 or 3 waste determination, accompanied by all supporting process knowledge and analytical data, must be submitted to the TCEQ for approval.

**Waste stream** (30 TAC Section 335.503)—The total flow of solid waste from homes, businesses, institutions, and manufacturing plants that is recycled, burned, or disposed of in landfills; or segments of that total flow, such as the “residential waste stream” or the “recyclable waste stream.” (It should be noted that the terms “waste stream”, “solid waste”, and “waste” are often used interchangeably by federal and state regulators as well as many members of the regulated community).

# Hazardous Substances

## Applicability: Empty Container Class 2 Evaluations

The following is a listing of materials identified as hazardous substances (40 CFR Table 302.4) in effect at the time of this guideline's printing. (As amended at 57 FR 61492, Dec. 24, 1992; 58 FR 35314, June 30, 1993; 59 FR 31551, June 20, 1994; 60 FR 7824 Feb. 9, 1995). Chemical Abstract Service (CAS) Registry Numbers of the materials are also provided.

Hazardous Substance	CAS Number	Hazardous Substance	CAS Number
Acenaphthene	83329	Ammonium fluoborate	13826830
Acenaphthylene	208968	Ammonium fluoride	12125018
Acetaldehyde	75070	Ammonium hydroxide	1336216
Acetaldehyde, chloro-	107200	Ammonium oxalate	6009707
Acetaldehyde, trichloro-	75876	Ammonium picrate	131748
Acetamide, N-(aminothioxomethyl)-	591082	Ammonium silicofluoride	16919190
Acetamide, N-9H-fluoren-2-yl-	53963	Ammonium sulfamate	7773060
Acetic acid	64197	Ammonium sulfide	12135761
Acetic acid (2,4-dichlorophenoxy)-	94757	Ammonium sulfite	10196040
Acetic anhydride	108247	Ammonium tartrate	14307438
Acetone	67641	Ammonium thiocyanate	1762954
Acetone cyanohydrin	75865	Ammonium vanadate	7803556
Acetonitrile	75058	Amyl acetate	628637
Acetophenone	98862	iso-	123922
2-Acetylaminofluorene	53963	sec-	626380
Acetyl bromide	506967	tert-	625161
Acetyl chloride	75365	Aniline	62533
1-Acetyl-2-thiourea	591082	Anthracene	120127
Acrolein	107028	Antimony	7440360
Acrylamide	79061	Antimony pentachloride	7647189
Acrylic acid	79107	Antimony potassium tartrate	28300745
Acrylonitrile	107131	Antimony tribromide	7789619
Adipic acid	124049	Antimony trichloride	10025919
Aldicarb	116063	Antimony trifluoride	7783564
Aldicarb sulfone	1646884	Antimony trioxide	1309644
Aldrin	309002	Aroclor 1016	12674112
Allyl alcohol	107186	Aroclor 1221	11104282
Allyl chloride	107051	Aroclor 1232	11141165
Aluminum phosphide	20859738	Aroclor 1242	53469219
Aluminum sulfate	10043013	Aroclor 1248	12672296
Ametycin	50077	Aroclor 1254	11097691
(7-amino-9-a-methoxymitosane)		Aroclor 1260	11096825
5-(Aminomethyl)-3-isoxazolol	2763964	Arsenic	7440382
4-Aminopyridine	504245	Arsenic acid H <sub>3</sub> AsO <sub>4</sub>	1327522
Amitrole	61825	Arsenic disulfide	1303328
Ammonia	7664417	Arsenic pentoxide, As <sub>2</sub> O <sub>5</sub>	1303282
Ammonium acetate	631618	Arsenic trichloride	7784341
Ammonium benzoate	1863634	Arsenic trioxide, As <sub>2</sub> O <sub>3</sub>	1327533
Ammonium bicarbonate	1066337	Arsenic trisulfide	1303339
Ammonium bichromate	7789095	Arsinic acid, dimethyl-	75605
Ammonium bifluoride	1341497	Asbestos	1332214
Ammonium bisulfite	10192300	Auramine	492808
Ammonium carbamate	1111780	Azaserine	115026
Ammonium carbonate	506876	1H-Azepine-1-carbothioic acid, hexahydro-, S-ethyl ester	2212671
Ammonium chloride	12125029	Aziridine, 2-methyl	75558
Ammonium chromate	7788989	Barium cyanide	542621
Ammonium citrate, dibasic	3012655	Benz[ <i>c</i> ]acridine	225514

Hazardous Substance	CAS Number	Hazardous Substance	CAS Number
Benzanthracene	56553	Cadmium	7440439
Benz[a]anthracene	57976	Cadmium acetate	543908
Benzene	71432	Cadmium bromide	7789426
Benzene, dichloromethyl-	98873	Cadmium chloride	10108642
Benzene, 2,6-diisocyanato-1-methyl-	91087	Calcium arsenate	7778441
Benzene, m-dimethyl	108383	Calcium arsenite	52740166
Benzene, o-dimethyl	95476	Calcium carbide	75207
Benzene, p-dimethyl	106423	Calcium chromate	13765190
Benzenesulfonic acid chloride	98099	Calcium cyanide Ca(CN) <sub>2</sub>	592018
Benzene, (trichloromethyl)	98077	Calcium dodecylbenzenesulfonate	26264062
Benzidine	92875	Calcium hypochlorite	7778543
Benzo[a]anthracene	56553	Captan	133062
1,3-Benzodioxol-4-ol, 2,2-dimethyl-, (Bendiocarb phenol)	22961826	Carbamic acid, butyl-, 3-iodo-2-n-butylcarbamate)	55406536
1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate (Bendiocarb)	22781233	Carbamic acid, [1- [(butylamino)carbonyl]- 1H-benzimidazol-2-yl, methyl ester (Benomyl)	17804352
Benzo[b]fluoranthene	205992	Carbamic acid, 1H-benzimidazol-2-yl, methyl ester	10605217
Benzo(k)fluoranthene	207089	Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butynyl ester	101279
Benzoic acid	65850	Carbamic acid, dimethyl-,1- [[dimethylamino)carbonyl]-5- methyl-1H-pyrazol-3-yl ester	644644
Benzoic acid, 2-hydroxy-, compound with (3aS-cis)-1,2,3,3a,8,8a- hexahydro-1,3a,8-trimethylpyrrolo- [2,3-b]indol-5-yl methylcarbamate ester (1:1) (Physostigmine salicylate)	57647	Carbamic acid, dimethyl-, 3-methyl-1-(1-methylethyl)- 1H-pyrazol-5-yl ester	119380
Benzonitrile	100470	Carbamic acid, methyl-, 3-methylphenyl ester	1129415
Benzo[rs]t]pentaphene	189559	Carbamic acid, [1,2-phenylenebis- (iminocarbonothioyl)]bis-, dimethyl ester	23564058
Benzo[ghi]perylene	191242	Carbamic acid, phenyl-, 1-methylethyl ester (Propham)	122429
Benzo[a]pyrene	50328	Carbamic acid, methylnitroso-, ethyl ester	615532
p-Benzoquinone	106514	Carbamic chloride, dimethyl-	79447
Benzotrichloride	98077	Carbamodithioic acid, dibutyl-, sodium salt	136301
Benzoyl chloride	98884	Carbamodithioic acid, diethyl-, 2-chloro-2-propenyl ester	95067
Benzyl chloride	100447	Carbamodithioic acid, diethyl-, sodium salt	148185
Beryllium chloride	7787475	Carbamodithioic acid, dimethyl-, potassium salt	128030
Beryllium powder	7440417	Carbamodithioic acid, dimethyl-, sodium salt	128041
Beryllium fluoride	7787497	Carbamodithioic acid, dimethyl-, tetraanhydrosulfide with orthoithioselenious acid	144343
Beryllium nitrate	13597994	Carbamodithioic acid, (hydroxymethyl)methyl-, monopotassium salt	51026289
alpha-BHC	319846	Carbamodithioic acid, methyl-, monopotassium salt	137417
beta-BHC	319857	Carbamodithioic acid, methyl-, monosodium salt	137428
delta-BHC	319868	Carbamothioic acid, bis(1- methylethyl)-, S-(2,3,3- trichloro -2-propenyl) ester	2303175
2,2'-Bioxirane	1464535	Carbamothioic acid, bis(2- methylpropyl)-, S-ethyl ester	2008415
Bis(2-chloroethyl) ether	111444		
Bis(2-chloroethoxy)methane	111911		
Bis(dimethylthiocarbamoyl) sulfide	97745		
Bis(2-ethylhexyl) phthalate	117817		
Bromoacetone	598312		
Bromoform	75252		
4-Bromophenyl phenyl ether	101553		
Brucine	357573		
1-Butanol	71363		
2-Butenal	123739		
Butyl acetate	123864		
iso-	110190		
sec-	105464		
tert-	540885		
n-Butyl alcohol	71363		
Butylamine	109739		
iso-	78819		
sec-	513495		
sec-	13952846		
tert-	75649		
Butyl benzyl phthalate	85687		
Butyric acid	107926		
iso-Butyric acid	79312		

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
Carbamothioic acid, butylethyl-, S-propyl ester	1114712	Cupric sulfate, ammoniated	10380297
Carbamothioic acid, cyclohexylethyl-, S-ethyl ester	1134232	Cupric tartrate	815827
Carbamothioic acid, dipropyl-, S-ethyl ester (EPTC)	759944	Cyanides	57125
Carbamothioic acid, dipropyl-, S-(phenylmethyl) ester	52888809	Cyanogen	460195
Carbamothioic acid, dipropyl-, S-propyl ester	1929777	Cyanogen bromide (CN)Br	506683
Carbaryl	63252	Cyanogen chloride	506774
Carbofuran	1563662	Cyclohexane	110827
Carbofuran, phenol	1563388	Cyclohexanone	108941
Carbosulfan	55285148	2-Cyclohexyl-4,6-dinitrophenol	131895
Carbon disulfide	75150	Cyclophosphamide	50180
Carbon oxyfluoride	353504	2,4-D Acid	94757
Carbon tetrachloride	56235	2,4-D (isopropyl) Esters	94111
Chlorambucil	305033		94791
Chlordane	57749		94804
Chlorine	7782505	Butoxyethyl	1320189
Chlornaphazine	494031		1928387
p-Chloroaniline	106478	Isooctyl	1928616
Chlorobenzene	108907	Dichlorophenoxyaceticacid- polyoxybutyl	1929733
Chlorobenzilate	510156		2971382
p-Chloro-m-cresol	59507	Daunomycin	25168267
Chlorodibromomethane	124481	DDD	53467111
Chloroethane	75003	DDE	20830813
2-Chloroethyl vinyl ether	110758	DDT	72548
Chloroform	67663	DDT	72559
Chloromethyl methyl ether	107302	Diallate	50293
2-Chloronaphthalene	91587	Diazinon	2303164
2-Chlorophenol	95578	Dibenzo[a,h]anthracene	333415
4-Chlorophenyl phenyl ether	7005723	1,2-Dibromo-3-chloropropane	53703
3-Chloropropionitrile	542767	Dibutylnitrosoamine	96128
Chlorosulfonic acid	7790945	Di-n-butyl phthalate	924163
4-Chloro-o-toluidine, hydrochloride	3165933	Dicamba	84742
Chlorpyrifos	2921882	Dichlobenil	1918009
Chromic acetate	1066304	Dichlone	1194656
Chromic acid	11115745	Dichlorobenzene	117806
Chromic sulfate	10101538	1,2-Dichlorobenzene	25321226
Chromium	7440473	1,3-Dichlorobenzene	95501
Chromous chloride	10049055	1,4-Dichlorobenzene	541731
Chrysene	218019	3,3'-Dichlorobenzidine	106467
Cobaltous bromide	7789437	Dichlorobromomethane	91941
Cobaltous formate	544183	1,4-Dichloro-2-butene	75274
Cobaltous sulfamate	14017415	Dichlorodifluoromethane	764410
Copper	7440508	1,1-Dichloroethane	75718
Copper, dimethyldithiocarbamate	137291	1,2-Dichloroethane	75343
Copper cyanide CuCN	544923	1,1-Dichloroethylene	107062
Coumaphos	56724	1,2-Dichloroethylene	75354
Creosote	8001589	Dichloroethyl ether	156605
Cresol(s)	1319773	Dichloroisopropyl	111444
m-Cresol	108394	Dichloromethoxyethane	108601
o-Cresol	95487	Dichloromethyl ether	111911
p-Cresol	106445	2,4-Dichlorophenol	542881
Cumene	98828	2,6-Dichlorophenol	120832
Cupric acetate	142712	Dichlorophenylarsine	87650
Cupric acetoarsenite	12002038	Dichloropropane	696286
Cupric chloride	7447394	1,1-Dichloropropane	26638197
Cupric nitrate	3251238	1,3-Dichloropropane	78999
Cupric oxalate	5893663	1,2-Dichloropropane	142289
Cupric sulfate	7758987	Dichloropropene	78875
		Dichloropropene	8003198
		2,3-Dichloropropene	26952238
		1,3-Dichloropropene	78886
			542756

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
2,2-Dichloropropionic acid	75990	Endrin & metabolites	72208
Dichlorvos	62737	Endrin aldehyde	7421934
Dicofol	115322	Epichlorohydrin	106898
Dieldrin	60571	Epinephrine	51434
Diethylamine	109897	Ethanimidithioic acid, 2-	30558431
Diethylarsine	692422	(dimethylamino-N-hydroxy-2-oxo-, methyl ester (A2213))	
1,4-Diethylenedioxiide	123911	Ethanimidithioic acid, 2-	23135220
O,O-Diethyl S-methyl dithiophosphate	3288582	(dimethylamino)-N-[[[(methylamino) carbonyl]oxy]-2-oxo-, methyl ester (Oxamyl)]	
Diethyl-p-nitrophenyl phosphate	311455	Ethanimidithioic acid, N,N'-	59669260
Diethyl-o-phthalate	84662	[thiobis[(methylimino) carbonyloxy]] bis-, dimethyl ester (Thiodicarb)	
O,O-Diethyl O-pyrazinyl phosphorothioate	297972	Ethanol, 2,2'-oxybis-, dicarbamate (Diethylene glycol, dicarbamate)	5952261
Diethylstilbestrol	56531	Ethion	563122
Dihydrosafrole	94586	Ethyl acetate	141786
Diisopropylfluorophosphate	55914	Ethyl acrylate	140885
3,3'-Dimethoxybenzidine	119904	Ethylbenzene	100414
Dimethylamine	124403	Ethyl carbamate	51796
p-Dimethylamino-azobenzene	60117	Ethyl cyanide	107120
3,3'-Dimethylbenzidine	119937	Ethylenebisdithiocarbamic acid, salts & esters	111546
1,1-Dimethylhydrazine	57147	Ethylenediamine	107153
1,2-Dimethylhydrazine	540738	Ethylenediamine-	60004
alpha,alpha- Dimethylphenethylamine	122098	tetraacetic acid (EDTA)	
2,4-Dimethylphenol	105679	Ethylene dibromide	106934
Dimethyl phthalate	131113	Ethylene glycol	110805
Dimethyl sulfate	77781	monoethyl ether	
Dinitrobenzene (mixed)	25154545	Ethylene oxide	75218
m-Dinitrobenzene	99650	Ethylenethiourea	96457
o-Dinitrobenzene	528290	Ethylenimine	151564
p-Dinitrobenzene	100254	Ethyl ether	60297
4,6-Dinitro-o-cresol and salts	534521	Ethyl methacrylate	97632
Dinitrophenol	25550587	Famphur	52857
2,5-Dinitrophenol	329715	Ferric ammonium citrate	1185575
2,6-Dinitrophenol	573568	Ferric ammonium oxalate	2944674
2,4-Dinitrophenol	51285	Ferric chloride	7705080
Dinitrotoluene	25321146	Ferric fluoride	7783508
3,4-Dinitrotoluene	610399	Ferric nitrate	10421484
2,4-Dinitrotoluene	121142	Ferric sulfate	10028225
2,6-Dinitrotoluene	606202	Ferrous ammonium sulfate	10045893
Dinoseb	88857	Ferrous chloride	7758943
Di-n-octyl phthalate	117840	Ferrous sulfate	7720787
1,2-Diphenylhydrazine	122667	Fluoranthene	206440
Diphosphoramide, octamethyl-	152169	Fluorene	86737
Diphosphoric acid, tetraethyl ester	107493	Fluorine	7782414
Dipropylamine	142847	Fluoroacetamide	640197
Di-n-propylnitrosamine	621647	Fluoroacetic acid, sodium salt	62748
Diquat	85007	Formaldehyde	50000
Disulfoton	298044	Formic acid	64186
Dithiobiuret	541537	Fumaric acid	110178
1,3-Dithiolane-2- carboxaldehyde, 2,4-dimethyl-, O-[(methylamino) carbonyl]oxime (Tirpate)	26419738	Furan	110009
Diuron	330541	Furfural	98011
Dodecylbenzenesulfonic acid	27176870	Glauramine	492808
Endosulfan	115297	Glycidylaldehyde	765344
alpha-Endosulfan	959988	Guanidine, N-methyl-N'-nitro-N-nitroso-	70257
beta-Endosulfan	33213659	Guthion	86500
Endosulfan sulfate	1031078		
Endothall	145733		

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
Heptachlor	76448	Methacrylonitrile	126987
Heptachlor epoxide	1024573	Methanesulfonic acid, ethyl ester	62500
Hexachlorobenzene	118741	Methanimidamide,	23422539
Hexachlorobutadiene	87683	N,N-dimethyl-N'-	
Hexachlorocyclohexane (all isomers)	608731	[3-[[[(methylamino)carbonyl]	
Hexachlorocyclohexane	58899	oxylphenyl]-, monohydrochloride	
(gamma isomer - Lindane)		Methanimidamide,	17702577
Hexachlorocyclopentadiene	77474	N,N-dimethyl-N'-	
Hexachloroethane	67721	[2-methyl-4-[[[(methylamino)	
Hexachlorophene	70304	carbonyl]oxy]phenyl]-	
Hexachloropropene	1888717	Methanol	67561
Hexaethyl tetraphosphate	757584	Methapyrilene	91805
Hydrazine	302012	Methomyl	16752775
Hydrazine, 1,2-diethyl-	1615801	Methoxychlor	72435
Hydrochloric acid	7647010	Methyl bromide	74839
Hydrocyanic acid	74908	1-Methylbutadiene	504609
Hydrofluoric acid	7664393	Methyl chloride	74873
Hydrogen sulfide H <sub>2</sub> S	7783064	Methyl chlorocarbonate	79221
Hydroperoxide, 1-methyl-1-phenylethyl	80159	3-Methylcholanthrene	56495
Indeno(1,2,3-cd)pyrene	193395	4,4'-Methylene(bis)chloroaniline	101144
Iron, tris	14484641	Methylene bromide	74953
(dimethylcarbamodithioato-S,S')-		Methylene chloride	75092
Isobutyl alcohol	78831	Methyl ethyl ketone (MEK)	78933
Isodrin	465736	Methyl ethyl ketone peroxide	1338234
Isophorone	78591	Methyl hydrazine	60344
Isoprene	78795	Methyl iodide	74884
Isopropanolamine	42504461	Methyl isobutyl ketone	108101
dodecylbenzenesulfonate		Methyl isocyanate	624839
Isosafrole	120581	Methylmercaptan	74931
3(2H)-Isoxazolone, 5-(aminomethyl)-	2763964	Methyl methacrylate	80626
Kepone	143500	Methyl parathion	298000
Lasiocarpine	303344	Methylthiouracil	56042
Lead	7439921	Mevinphos	7786347
Lead acetate	301042	Mexacarbate	315184
Lead arsenate	7784409	Mitomycin C	50077
Lead chloride	7758954	Monoethylamine	75047
Lead fluoborate	13814965	Monomethylamine	74895
Lead fluoride	7783462	Naled	300765
Lead iodide	10101630	1-Naphthalenamine	134327
Lead nitrate	10099748	2-Naphthalenamine	91598
Lead phosphate	7446277	Naphthalene	91203
Lead stearate	7428480	1,4-Naphthalenedione	130154
Lead subacetate	1335326	Naphthenic acid	1338245
Lead sulfate	15739807	alpha-Naphthylthiourea	86884
Lead sulfide	1314870	Nickel	7440020
Lead thiocyanate	592870	Nickel ammonium sulfate	15699180
Lithium chromate	14307358	Nickel carbonyl	13463393
Malathion	121755	Nickel chloride	7718549
Maleic acid	110167	Nickel cyanide Ni(CN) <sub>2</sub>	557197
Maleic anhydride	108316	Nickel hydroxide	12054487
Maleic hydrazide	123331	Nickel nitrate	14216752
Manganese dimethyldithiocarbamate	15339363	Nickel sulfate	7786814
Melphalan	148823	Nicotine, & salts	54115
Mercaptodimethur	2032657	Nitric acid	7697372
Mercuric cyanide	592041	p-Nitroaniline	100016
Mercuric nitrate	10045940	Nitrobenzene	98953
Mercuric sulfate	7783359	Nitrogen dioxide NO <sub>2</sub>	10102440
Mercuric thiocyanate	592858	Nitrogen oxide NO	10102439
Mercurous nitrate	10415755	Nitroglycerine	55630
Mercury	7439976	Nitrophenol (mixed)	25154556
Mercury fulminate	628864	m-Nitrophenol	554847

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
o-Nitrophenol	88755	Potassium chromate	7789006
p-Nitrophenol	100027	Potassium cyanide KCN	151508
2-Nitropropane	79469	Potassium hydroxide	1310583
N-Nitrosodiethanolamine	1116547	Potassium permanganate	7722647
N-Nitrosodiethylamine	55185	Potassium silver cyanide	506616
N-Nitrosodimethylamine	62759	Pronamide	23950585
N-Nitrosodiphenylamine	86306	1,3-Propane sultone	1120714
N-Nitrosopyrrolidine	930552	Propanedinitrile	109773
Nitrotoluene	1321126	Propargite	2312358
m-Nitrotoluene	99081	Propargyl alcohol	107197
o-Nitrotoluene	88722	Propionic acid	79094
p-Nitrotoluene	99990	Propionic anhydride	123626
5-Nitro-o-toluidine	99558	n-Propylamine	107108
Osmium tetroxide OsO <sub>4</sub>	20816120	Propylene oxide	75569
Paraformaldehyde	30525894	Pyrene	129000
Paraldehyde	123637	Pyrethrins	121299
Parathion	56382	Pyridine	110861
Pentachlorobenzene	608935	Pyridine, 2-methyl-	109068
Pentachloroethane	76017	Pyrrolo[2,3-b] indol-5-ol, 1,2,3,3a,8,8a-hexahydro-1,3a,8- trimethyl-, methylcarbamate (ester), (3aS-cis)-Physostigmine	57476
Pentachloronitrobenzene	82688	Quinoline	91225
Pentachlorophenol	87865	Reserpine	50555
Perchloroethylene	127184	Resorcinol	108463
Phenacetin	62442	Saccharin and salts	81072
Phenanthrene	85018	Safrole	94597
Phenol	108952	Selenious acid	7783008
Phenol, 3-(1-methylethyl)-, methyl carbamate (m-Cumenyl methylcarbamate)	64006	Selenium	7782492
Phenol, 3-methyl-5- (1-methylethyl)-, methyl carbamate (Promecarb)	2631370	Selenium dioxide	7446084
Phenylmercury acetate	62384	Selenium sulfide SeS <sub>2</sub>	7488564
Phenylthiourea	103855	Selenourea	630104
Phorate	298022	Silver	7440224
Phosgene	75445	Silver cyanide AgCN	506649
Phosphine	7803512	Silver nitrate	7761888
Phosphoric acid	7664382	Silvex (2,4,5-TP)	93721
Phosphorodithioic acid, O,O-dimethyl S- [2(methylamino)-2-oxoethyl] ester	60515	Sodium	7440235
Phosphorus	7723140	Sodium arsenate	7631892
Phosphorus oxychloride	10025873	Sodium arsenite	7784465
Phosphorus pentasulfide	1314803	Sodium azide	26628228
Phosphorus trichloride	7719122	Sodium bichromate	10588019
Phthalic anhydride	85449	Sodium bifluoride	1333831
Piperidine, 1-nitroso-	100754	Sodium bisulfite	7631905
Piperidine, 1,1'- (tetrathiodicarbonothioyl)bis- (Bis(pentamethylene)thiuram tetrasulfide)	120547	Sodium chromate	7775113
Polychlorinated biphenyls (PCBs)	1336363	Sodium cyanide NaCN	143339
Aroclor 1016	12674112	Sodium dodecyl- benzenesulfonate	25155300
Aroclor 1221	11104282	Sodium fluoride	7681494
Aroclor 1232	11141165	Sodium hydrosulfide	16721805
Aroclor 1242	53469219	Sodium hydroxide	1310732
Aroclor 1248	12672296	Sodium hypochlorite	7681529
Aroclor 1254	11097691	Sodium methylate	124414
Aroclor 1260	11096825	Sodium nitrite	7632000
Potassium arsenate	7784410	Sodium phosphate, dibasic	7558794
Potassium arsenite	10124502	Sodium phosphate, tribasic	7601549
Potassium bichromate	7778509	Sodium selenite	10102188
		Streptozotocin	18883664
		Strontium chromate	7789062
		Strychnine, & salts	57249
		Styrene	100425
		Sulfur monochloride	12771083

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
Sulfuric acid	7664939	Trichloroethene (Trichloroethylene)	79016
2,4,5-T acid	93765	Trichloromethanesulfonyl chloride	594423
2,4,5-T amines	2008460	Trichloromonofluoromethane	75694
	1319728	Trichlorophenol	25167822
	3813147	2,3,4-Trichlorophenol	15950660
	6369966	2,3,5-Trichlorophenol	933788
	6369977	2,3,6-Trichlorophenol	933755
2,4,5-T (n-butyl) esters	93798	3,4,5-Trichlorophenol	609198
	1928478	2,4,5-Trichlorophenol	95954
	2545597	2,4,6-Trichlorophenol	88062
Isooctyl	25168154	Triethanolamine	27323417
Methylpropyl	61792072	dodecylbenzenesulfonate	
2,4,5-T salts	13560991	Triethylamine	121448
1,2,4,5-Tetrachlorobenzene	95943	Trimethylamine	75503
2,3,7,8-Tetrachloro-	1746016	1,3,5-Trinitrobenzene	99354
dibenzo-p-dioxin (TCDD)		Tris(2,3-dibromopropyl)phosphate	126727
1,1,1,2-Tetrachloroethane	630206	Trypan blue	72571
1,1,2,2-Tetrachloroethane	79345	Uracil mustard	66751
2,3,4,6-Tetrachlorophenol	58902	Uranyl acetate	541093
Tetraethyllead	78002	Uranyl nitrate	10102064
Tetraethylthiopyrophosphate	3689245	Urea, N-ethyl-N-nitroso-	759739
Tetrahydrofuran	109999	Urea, N-methyl-N-nitroso-	684935
Tetranitromethane	509148	Vanadium pentoxide	1314621
Thallium	7440280	Vanadyl sulfate	27774136
Thallium(I) acetate	563688	Vinyl chloride	75014
Thallium(I) carbonate	6533739	Vinyl acetate	108054
Thallium chloride TlCl	7791120	Vinylamine, N-methyl-N-nitroso-	4549400
Thallium(I) nitrate	10102451	Warfarin, and salts, when present at	81812
Thallium oxide Tl <sub>2</sub> O <sub>3</sub>	1314325	concentrations greater than 0.3%	
Thallium selenite	12039520	Xylene (mixed)	1330207
Thallium(I) sulfate	7446186	Xylenol	1300716
2H-1,3,5-Thiadiazine-2-thione,	533744	Zinc	7440666
tetrahydro-3,5-dimethyl- (Dazomet)		Zinc acetate	557346
Thioacetamide	62555	Zinc ammonium chloride	52628258
Thiofanox	39196184	Zinc, bis(dimethyl	137304
Thioperoxydicarbonic diamide,	1634022	carbomodithioato-S,S')- (Ziram)	
tetrabutyl (Tetrabutylthiuram disulfide)		Zinc, bis(diethylcarbamo	14324551
Thioperoxydicarbonic diamide,	97778	dithioato-S,S')- (Ethyl Ziram)	
tetraethyl (Disulfiram)		Zinc borate	1332076
Thiophenol	108985	Zinc bromide	7699458
Thiosemicarbazide	79196	Zinc carbonate	3486359
Thiourea	62566	Zinc chloride	7646857
Thiourea, (2-chlorophenyl)-	5344821	Zinc cyanide Zn(CN) <sub>2</sub>	557211
Thiram	137268	Zinc fluoride	7783495
Toluene	108883	Zinc formate	557415
Toluenediamine	95807	Zinc hydrosulfite	7779864
Toluene diisocyanate	584849	Zinc nitrate	7779886
o-Toluidine	95534	Zinc phenolsulfonate	127822
p-Toluidine	106490	Zinc phosphide Zn <sub>3</sub> P <sub>2</sub> ,	1314847
o-Toluidine	636215	when present at concentrations	
hydrochloride		greater than 10%	
Toxaphene	8001352	Zinc silicofluoride	16871719
2,4,5-TP esters	32534955	Zinc sulfate	7733020
Trichlorfon	52686	Zirconium nitrate	13746899
1,2,4-Trichlorobenzene	120821	Zirconium potassium fluoride	16923958
1,1,1-Trichloroethane	71556	Zirconium sulfate	14644612
1,1,2-Trichloroethane	79005	Zirconium tetrachloride	10026116

# Ignitable Solids

(30 TAC Chapter 335 Subchapter R Appendix 1 Table 2)

Constituents listed from Department of Transportation Regulations, 49 CFR Part 173 Subpart E, October 1, 1993. Note: The presence of a constituent on this table in a nonhazardous waste does not automatically identify that waste as a Class 1 ignitable waste. The constituents on this table are examples of materials which could be considered Class 1 ignitable waste. The physical characteristics of the waste will be the determining factor as to whether or not a waste is ignitable. Refer to 30 TAC §335.505(2) (relating to Class 1 Waste Determination) for the Class 1 ignitable criteria.

Compound or Material	Compound or Material
Aluminum, metallic, powder	Celluloid
Alkali metal amalgams	Cerium
Alkali metal amides	Cesium metal
Aluminum alkyl halides	Chromic acid or chromic acid mixture, dry
Aluminum alkyl hydrides	Cobalt naphthenates, powder
Aluminum alkyls	Cobalt resinate
Aluminum borohydrides	Decaborane
Aluminum carbide	2-Diazo-1-naphthol-4-sulphochloride
Aluminum ferrosilicon powder	2-Diazo-1-naphthol-5-sulphochloride
Aluminum hydride	2,5-Diethoxy-4-morpholinobenzene-diazonium zinc choride
Aluminum phosphide	Diethylzinc
Aluminum resinate	4-Dimethylamino-6-(2-dimethylaminoethoxy)-toluene-2-diazonium zinc chloride
Aluminum silicon powder	Dimethylzinc
Ammonium picrate	Dinitrophenolates
2,2'-Azodi(2,4-dimethyl-4-methoxyvaleronitrile)	Dinitroresorcinol
2,2'-Azodi(2,4-dimethylvaleronitrile)	N,N'-Dinitroso-N,N'-dimethylterephthalamide
1,1' Azodi(hexahydrobenzonitrile)	N,N'-Dinitrosopentamethylenetetramine
2,2'-Azodi(2-methyl-butryronitrile)	Diphenyloxide-4,4'-disulfohydrazide
Azodiisobutyronitrile	Dipicryl sulfide
Barium, metallic	4-Dipropylaminobenzenediazonium zinc chloride
Barium alloys, pyrophoric	Ferrocium
Barium azide	Ferrosilicon
Benzene-1,3-disulfohydrazide	Ferrous metal
Benzene sulfohydrazide	Hafnium powder
4-(Benzyl(ethyl)amino)-3-ethoxy-benzenediazonium zinc chloride	Hexamine
4-(Benzyl(methyl)amino)-3-ethoxy-benzenediazonium zinc chloride	Hydrides, metal
Borneol	3-(2-Hydroxyethoxy)-4-pyrrolidin-1-ylbenzenediazonium zinc chloride
Boron trifluoride dimethyl etherate	Iron oxide, spent
5-tert-Butyl-2,4,6-trinitro-m-xylene	Isosorbide dinitrate mixture
Calcium, metallic	Lead phosphite, dibasic
Calcium carbide	Lithium acetylide-ethylene diamine complex
Calcium chlorite	Lithium alkyls
Calcium cyanamide	Lithium aluminum hydride
Calcium dithionite	Lithium amide, powdered
Calcium hypochlorite	Lithium borohydride
Calcium manganese silicon	Lithium ferrosilicon
Calcium silicon powder	Lithium hydride
Calcium phosphide	Lithium metal
Calcium pyrophoric	Lithium nitride
Calcium resinate	Lithium silicon
Calcium silicide	Magnesium granules
Camphor, synthetic	Magnesium aluminum phosphide
Carbon, activated	

*Appendix B – Ignitable Solids*

Compound or Material	Compound or Material
Magnesium diamide	Sodium aluminum hydride
Magnesium phosphide	Sodium amide
Magnesium silicide	Sodium borohydride
Maneb	Sodium chlorite
Manganese resinate	Sodium 2-diazo-1-naphthol-4-sulphonate
Methyl magnesium bromide	Sodium 2-diazo-1-naphthol-5-sulphonate
Methyldichlorosilane	Sodium dichloro-s-triazinetrione
Mono-(trichloro)tetra(monopotassium dichloro)- penta-s-triazinetrione	Sodium dinitro-ortho-cresolate
N-Methyl-N'-nitronitrosoguanidine	Sodium hydride
Naphthalene	Sodium hydrosulfite
Nitrocellulose mixtures	Sodium methyrate
Nitroguanidine	Sodium nitrite and mixtures
p-Nitrosodimethylaniline	Sodium picramate, wet
Paraformaldehyde	Sodium potassium alloys
Pentaborane	Sodium sulfide, anhydrous
Peratic acid	Stannic phosphide
Phosphorous, amorphous, red	Strontium phosphide
Phosphorous, white or yellow	Sulfur
Phosphoric anhydride	Titanium metal powder
Phosphorous pentachloride	Titanium hydride
Phosphorus pentasulfide	Trichloroisocyanuric acid
Phosphorus sesquisulfide	Trichlorosilane
Phosphorus trisulfide	Trichloro-s-triazinetrione
Picric acid	Trinitrobenzoic acid
Potassium, metallic	Trinitrophenol
Potassium dichloro-s-triazinetrione	Trinitrotoluene
Potassium borohydride	Urea nitrate
Potassium dithionite	Zinc ammonium nitrite
Potassium phosphide	Zinc phosphide
Potassium sulfide, anhydrous	Zinc powder
Rubidium metal	Zinc resinate
Silicon powder, amorphous	Zirconium hydride, powdered
Silver picrate	Zirconium picramate
Sodium, metallic	Zirconium powder
	Zirconium scrap

# Class 1 Toxic Constituents' Maximum Leachable Concentrations

(30 TAC Chapter 335 Subchapter R Appendix 1 Table 1)

## Applicability: Class 1, 2, and 3 Waste Evaluations

Values are based on information contained in Federal Registers Vol. 55 / Friday, July 27, 1990; Vol. 56 / June 7, 1991; and Integrated Risk Information Systems, Environmental Protection Agency, and 40 CFR 264 Appendix 9.

Compound	CAS No.	Concentration (mg/l)	Compound	CAS No.	Concentration (mg/l)
Acenaphthene	83-32-9	210	Dieldrin	60-57-1	0.02
Acetone	67-64-1	400	Diethyl phthalate	84-66-2	3000
Acetonitrile	75-05-8	20	Dimethoate	60-51-5	70
Acetophenone	98-86-2	400	2,4-Dimethyphenol	105-67-9	70
Acrylamide	79-06-1	0.08	2,6-Dimethyphenol	576-26-1	21
Acrylonitrile	107-13-1	0.6	m-Dinitrobenzene	99-65-0	0.4
Aniline	62-53-3	60	2,4-Dinitrophenol	51-28-5	7
Anthracene	120-12-7	1050	2,4-Dinitrotoluene	602-01-7	0.13
Antimony	7440-36-0	1	(and 2,6-, mixture)		
Arsenic	7440-38-2	1.8	Dinoseb	88-85-7	3.5
Barium	7440-39-3	100.0	1,4-Dioxane	123-91-1	30
Benzene	71-43-2	0.50	Dioxins (Polychlorinated dibenzo-p-dioxins)		
Benzidine	92-87-5	0.002	2,3,7,8-TCDD	1746-01-6	0.005
Beryllium	7440-41-7	0.08	1,2,3,7,8-PeCDD	40321-76-4	0.010
Bis(2-chloroethyl) ether	111-44-4	0.3	1,2,3,4,7,8-HxCDD	57653-85-7	0.050
Bis(2-ethylhexyl) phthalate	117-81-7	30	1,2,3,6,7,8-HxCDD	34465-46-8	0.050
Bromodichloromethane	75-27-4	0.3	1,2,3,7,8,9-HxCDD		0.050
Bromomethane	74-83-9	5	Diphenylamine	122-39-4	90
Butylbenzyl phthalate	85-68-7	700	1,2-Diphenylhydrazine	122-66-7	0.4
Cadmium	7440-43-9	0.5	Disulfoton	298-04-4	0.1
Carbon disulfide	75-15-0	400	Endosulfan	959-98-8	0.2
Carbon tetrachloride	56-23-5	0.50	Endrin	72-20-8	.02
Chlordane	57-74-9	0.03	2-Ethoxyethanol	10-80-5	1400
Chlorobenzene	108-90-7	70	Ethylbenzene	100-41-4	400
Chloroform	67-66-3	6.0	Ethylene dibromide	106-93-4	0.004
Chloro-m-cresol, p	59-50-7	7000	Ethylene glycol	107-21-1	7000
2-Chlorophenol	95-57-8	20	Fluoranthene	206-44-0	140
Chromium	7440-47-3	5.0	Fluorene	86-73-7	140
m-Cresol	108-39-4	200.0*	Furans (Polychlorinated dibenzofurans)		
o-Cresol	95-48-7	200.0*	2,3,7,8-TCDF	51207-31-9	0.050
p-Cresol	106-44-5	200.0*	1,2,3,7,8-PeCDF		0.100
DDD	72-54-8	1	2,3,4,7,8-PeCDF		0.010
DDE	72-55-9	1	1,2,3,4,7,8-HxCDF		0.050
DDT	50-29-3	1	1,2,3,6,7,8-HxCDF		0.050
Dibutyl phthalate	84-74-2	400	1,2,3,7,8,9-HxCDF		0.050
1,4-Dichlorobenzene	106-46-7	7.5	Heptachlor	76-44-8	0.008
3,3-Dichlorobenzidine	91-94-1	0.8	Heptachlor epoxide	1024-57-3	0.04
1,2-Dichloroethane	107-06-2	0.50	Hexachlorobenzene	118-74-1	0.13
Dichlorodifluoromethane	75-71-8	700	Hexachloro-1,3-butadiene	87-68-3	0.4
1,1-Dichloroethylene	75-35-4	0.6	Hexachlorocyclopentadiene	77-47-4	20
1,3-Dichloropropene	542-75-6	1	Hexachloroethane	67-72-1	3.0
2,4-Dichlorophenol	120-83-2	10	Hexachlorophene	70-30-4	1
2,4-Dichlorophenoxy- acetic acid (2,4-D)	94-75-7	10.0	Isobutyl alcohol	78-83-1	1000
			Isophorone	78-59-1	90

*Appendix C – Class 1 Toxic Constituents’  
Maximum Leachable Concentrations (MCLs)*

<b>Compound</b>	<b>CAS No.</b>	<b>Concentration (mg/l)</b>	<b>Compound</b>	<b>CAS No.</b>	<b>Concentration (mg/l)</b>
Lead	7439-92-1	1.5	Pyridine	110-86-1	4
Lindane	58-89-9	0.3	Selenium	7782-49-2	1.0
Mercury	7439-97-6	0.2	Silver	7440-22-4	5.0
Methacrylonitrile	126-98-7	0.4	Styrene	100-42-5	700
Methomyl	16752-77-5	90	1,1,1,2-Tetrachloroethane	630-20-6	10
Methoxychlor	72-43-5	10.0	1,1,2,2-Tetrachloroethane	79-34-5	2
2-Methoxyethanol	109-86-4	14.0	Tetrachloroethylene	127-18-4	0.7
Methyl ethyl ketone	78-93-3	200.0	2,3,4,6-Tetrachlorophenol	58-90-2	100
Methyl isobutyl ketone	108-10-1	200	Toluene	108-88-3	1000
Methylene chloride	75-09-2	50	Toxaphene	8001-35-2	0.3
Methyl parathion	298-00-0	0.9	trans-1,3-Dichloropropene	542-75-6	1
Mirex	2385-85-5	0.7	Tribromomethane (Bromoform)	75-25-2	70
Nickel	7440-02-0	70	1,2,4-Trichlorobenzene	120-82-1	70
Nitrobenzene	98-95-3	2.0	1,1,1-Trichloroethane	71-55-6	300
N-Nitroso-di-n-butylamine	924-16-3	0.06	Trichloroethylene	79-01-6	0.5
N-Nitrosodiphenylamine	86-30-6	70	1,1,2-Trichloroethane	79-00-5	6
N-Nitrosomethylethylamine	10595-95-6	0.02	Trichlorofluoromethane	75-69-4	1000
N-Nitroso-n-propylamine	621-64-7	0.05	2,4,5-Trichlorophenoxy- propionic acid (2,4,5-TP or Silvex)	93-72-1	1.0
N-Nitrosopyrrolidine	930-55-2	0.2	1,2,3-Trichloropropane	96-18-4	20
p-Phenylenediamine	106-50-3	20	2,4,5-Trichlorophenol	95-95-4	400.0
Parathion	56-38-2	20	2,4,6-Trichlorophenol	88-06-2	2
Pentachlorobenzene	608-93-5	3	Vanadium pentoxide	1314-62-1	30
Pentachloronitrobenzene	82-68-8	10	Vinyl chloride	75-01-4	0.2
Pentachlorophenol	87-86-5	100.0	Xylenes (all isomers)	1330-82-1	7000
Phenol	108-95-2	2000			
Pronamide	23950-58-5	300			
Pyrene	129-00-0	5.9			

\* If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.  
The Maximum Concentration for total cresol is 200.0 mg/l.

# 7-Day Distilled Water Leachate Test's Maximum Contaminant Levels

(30 TAC Chapter 335 Subchapter R APPENDIX 1 Table 3)

Applicability: **Class 3 Waste Evaluations**

Values obtained from 40 Code of Federal Regulations Part 141, Subparts B and G, Maximum Contaminant Levels and 40 Code of Federal Regulations Part 143, Total Dissolved Solids.

Constituent	MCL (mg/l)
Arsenic	0.05
Barium	1
*Benzene	0.005
Cadmium	0.005
*Carbon tetrachloride	0.005
Chlordane	0.002
*Chlorobenzene	0.1
Chromium	0.1
2,4-D	0.07
*Dibromochloropropane	0.0002
*ortho-Dichlorobenzene	0.6
*para-Dichlorobenzene	0.075
*1,2-Dichloroethane	0.005
*1,1-Dichloroethylene	0.007
*trans-1,2-Dichloroethylene	0.1
*1,2-Dichloropropane	0.005
*Ethylbenzene	0.7
Heptachlor	0.0004
Heptachlor epoxide	0.0002
Lead	0.05
Mercury	0.002
Methoxychlor	0.04
Pentachlorophenol	0.001
Selenium	0.05
Silver	0.05
*Styrene	0.1
*Tetrachloroethylene	0.005
*1,1,1-Trichloroethane	0.20
*Trichloroethylene	0.005
*Toluene	1
Toxaphene	0.003
2,4,5-TP (Silvex)	0.05
*Vinyl chloride	0.002
*Xylenes (total)	10
Total dissolved solids	500

\* For a Class 3 waste classification, these constituents must also be evaluated using the test methods described in 40 Code of Federal Regulations, Part 261, Appendix II. See §335.507 (4) (A) (ii) for additional information.

# Class 1 Toxic Constituents

(other than those identified in Appendix C, and their Estimated Quantitation Limits [EQLs])

## Applicability: Class 3 Waste Evaluations

This table is to be utilized by the generator in evaluating detection limits for the identified constituents. The EQLs in this table are defined as the lowest detectable levels that can be reliably achieved using the Toxicity Characteristic Leaching Procedure (TCLP) at the time of the printing of this guideline. Applicable EPA method numbers are provided and can be found in EPA Report SW-846 "Test Methods for Evaluating Solid Waste" except where noted. Please note that more than one test method may be available for a particular constituent. Synonyms are provided in brackets "[ ]".

Constituent	EQL (mg/l)	Method(s)	Constituent	EQL (mg/l)	Method(s)
Acenaphthene	0.2	8100	Chloroform	0.0005	8010
	0.01	8270		0.005	8240
	0.02	8250		0.005	8040
Acetone	0.1	8240	p-Chloro-m-cresol	0.02	8270
	0.1	8015	2-Chlorophenol	0.003	8040
Acetonitrile	0.1	8015	[o-Chlorophenol]	0.01	8270
[Methyl cyanide]	0.1	8030	m-Cresol	0.01	8270
Acetophenone	0.001	8250	o-Cresol	0.01	8270
	0.01	8270	p-Cresol	0.01	8270
	0.005	8015	DDD [Dichlorodiphenyl-	0.0001	8080
Acrylamide	0.005	8015	dichloroethane]	0.028	8250
Acrylonitrile	0.005	8030		0.01	8270
[Vinyl cyanide]	0.005	8240	DDE [Dichlorodiphenyl-	0.00004	8080
Anthracene	0.2	8100	ethylene]	0.056	8250
	0.02	8250		0.01	8270
	0.01	8270	DDT [Dichlorodiphenyl-	0.0001	8080
	0.01	8250	trichloroethane]	0.047	8250
Aniline	0.01	8250		0.01	8270
[Benzyl amine]	0.01	8270	Dibutyl phthalate	0.005	8060
Antimony	0.2	204		0.01	8270
	0.3	6010	1,4-Dichlorobenzene	0.004	8010
	2.0	7040		0.003	8020
	0.03	7041		0.013	8120
	2.0	7000A		0.01	8270
Benzidine [Dianiline]	0.44	8250	3,3-Dichlorobenzidine	0.02	8270
Beryllium	**	210	Dichlorodifluoromethane	0.01	8010
	0.003	6010		0.005	8240
	0.05	7090	1,3-Dichloropropene	0.003	8010
	0.002	7091		0.005	8240
	0.05	7000A	2,4-Dichlorophenol	0.05	8040
Bis(2-chloroethyl) ether	0.057	8250		0.01	8270
[Dichloroethyl ether]	0.01	8270	Dieldrin	0.00002	8080
Bis(2-ethylhexyl)	0.02	8060		0.01	8270
phthalate	0.25	8250	Diethyl phthalate	0.005	8060
	0.01	8270		0.01	8270
	0.001	8010	Dimethoate	0.02	8270
Bromodichloromethane	0.005	8240	2,4-Dimethylphenol	0.003	8040
Bromomethane	0.003	8010		0.01	8270
	0.01	8240	2,6-Dimethylphenol	**	**
[Methylbromide]	0.01	8240	m-Dinitrobenzene	0.01	8270
Butylbenzyl phthalate	0.005	8060			
[Benzylbutyl phthalate]	0.025	8250			
Carbon disulfide [CS <sub>2</sub> ]	0.01	8270			
	0.005	8240			

Constituent	EQL (mg/l)	Method(s)	Constituent	EQL (mg/l)	Method(s)
2,4-Dinitrophenol	0.13	8040	Methyl ethyl ketone [MEK]	0.01	8015
	0.05	8270		0.1	8240
2,4-Dinitrotoluene	0.0002	8090	Methyl isobutyl ketone [MIBK]	**	8015
(and 2,6-, mixture)	0.01	8270		0.005	8240
Dinoseb	0.007	8150	Methylene chloride	0.005	8010
	0.02	8270	[Dichloromethane]	0.005	8240
1,4-Dioxane	0.15	8015	Methyl parathion	0.0003	8140
Dioxins (Polychlorinated dibenzo-p-dioxins)				0.01	8270
2,3,7,8-TCDD	0.000005	8280	Mirex	**	**
1,2,3,7,8-PeCdd	0.00001	8280	Nickel	0.04	249
1,2,3,4,7,8-HxCDD	0.00001	8280		0.05	6010
1,2,3,6,7,8-HxCDD	0.00001	8280		0.4	7520
1,2,3,7,8,9-HxCDD	0.00001	8280		0.04	7000A
Diphenylamine	0.01	8270	Nitrobenzene	0.04	8090
1,2-Diphenylhydrazine	0.2	1625		0.01	8250
Disulfoton	0.002	8140		0.01	8270
	0.01	8270	N-Nitroso-di-n-butylamine	0.01	8270
Endosulfan	0.0001	8080	N-Nitrosodiphenylamine	0.01	8270
	0.056	8250	N-Nitrosomethylethylamine	0.02	8270
Endrin	0.00006	8080	N-Nitroso-n-propylamine	0.01	8270
	0.01	8250	N-Nitrosopyrrolidine	0.01	8270
2-Ethoxyethanol	**	**	p-Phenylenediamine	0.01	8270
Ethylene dibromide [EDB]	0.5	6231	Parathion	0.01	8270
(Standard Methods for Examination of Water and Wastewater)				0.0003	8140
Ethylene glycol	**	**	Pentachlorobenzene	0.02	8270
Fluoranthene	0.2	8100	Pentachloronitrobenzene	0.01	8270
	0.01	8270	Phenol	0.001	8040
Fluorene	0.2	8100		0.01	8270
	0.01	8270	Pronamide	0.01	8270
Furans (Polychlorinated dibenzofurans)			Pyrene	0.2	8100
2,3,7,8-TCDF	0.00001	8280		0.01	8270
1,2,3,7,8-PeCDF	0.00001	8280	Pyridine	0.005	8240
2,3,4,7,8-PeCDF	0.00001	8280		0.01	8270
1,2,3,4,7,8-HxCDF	0.00001	8280	1,1,1,2-Tetrachloroethane	0.005	8010
1,2,3,6,7,8-HxCDF	0.00001	8280		0.005	8240
1,2,3,7,8,9-HxCDF	0.00001	8280	1,1,2,2-Tetrachloroethane	0.0003	8010
Hexachlorobenzene	0.0005	8120		0.005	8240
	0.0	8270	2,3,4,6-Tetrachlorophenol	0.01	8270
Hexachloro-1,3-butadiene	0.0034	8120	trans-1,3-Dichloropropene	0.0034	8010
	0.01	8270		0.005	8240
Hexachlorocyclopentadiene	0.004	8120	Tribromomethane [Bromoform]	0.002	8010
	0.01	8270		0.005	8240
Hexachloroethane	0.0003	8120	1,2,4-Trichlorobenzene	0.01	8270
	0.01	8270	1,1,2-Trichloroethane	0.0002	8010
Hexachlorophene	0.05	8270	[1,1,2-TCE]	0.005	8240
Isobutyl alcohol	0.05	8015	Trichlorofluoromethane	0.01	8010
Isophorone	0.06	8090	[Freon 11]	0.005	8240
	0.01	8270	1,2,3-Trichloropropane	0.01	8010
Lindane	0.00004	8080		0.005	8240
	0.01	8250	2,4,5-Trichlorophenol	0.01	8270
	0.00004	608	2,4,6-Trichlorophenol	0.006	8040
	0.01	625		0.01	8270
Methacrylonitrile	0.005	8015	Vanadium pentoxide	0.2	286
Methomyl	0.09	632		0.08	6010
2-Methoxyethanol	**	**		2.0	7910
				0.04	7911

\* If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.

\*\* This information not available at time of publication.

# 7-Day Distilled Water Leachate Test Procedure

(30 TAC Chapter 335 Subchapter R Appendix 4)

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Applicability: **Class 3 Waste Evaluations**

This test is intended only for dry, solid wastes, i.e., waste materials without any free liquids.

1. Place a 250 gram (dry weight) representative sample of the waste material in a 1500 milliliter Erlenmeyer flask.
2. Add 1 liter of deionized or distilled water into the flask and mechanically stir the material at a low speed for five (5) minutes.
3. Stopper the flask and allow to stand for seven (7) days.
4. At the end of seven (7) days, filter the supernatant solution through a 0.45 micron filter, collecting the supernatant into a separate flask.
5. Subject the filtered leachate to the appropriate analysis.

# Form Codes

(30 TAC Chapter 335 Subchapter R Appendix 3)

Applicability: **All Waste**

In determining a waste stream's form code, it is recommended that the generator first determine into which major category the waste stream fits (e.g. inorganic liquids). The generator should then review all the form code descriptors in that category to determine which code or codes best describe the generator's waste stream. The generator should then choose, from the narrowed-down list, a form code for the waste stream.

Form codes are fairly generic in their descriptions. It is possible that more than one form code may be applicable to a particular waste stream. Generators should assign the form code which best describes the waste stream. If more than one form code can "best describe" the waste stream, then the generator should choose one of those several codes.

Code	Waste Description	Code	Waste Description
<b>— Lab Packs —</b>			
<i><b>Lab Packs</b> — Lab packs of mixed wastes, chemicals, lab wastes</i>		113	Other aqueous waste with high dissolved solids
001	Lab packs of old chemicals only	114	Other aqueous waste with low dissolved solids
002	Lab packs of debris only	115	Scrubber water
003	Mixed lab packs	116	Leachate
004	Lab packs containing acute hazardous wastes	117	Waste liquid mercury
009	Other lab packs (Specify in Comments)	119	Other inorganic liquids (Specify in Comments)
		198	Nonhazardous photographic chemical wastes (inorganic)
		199	Brine solution that could also bear the form code 113
<b>— Liquids —</b>			
<i><b>Inorganic Liquids</b> — Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content</i>		<i><b>Organic Liquids</b> — Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content</i>	
101	Aqueous waste with low solvents	201	Concentrated solvent-water solution
102	Aqueous waste with low other toxic organics	202	Halogenated (e.g., chlorinated) solvent
103	Spent acid with metals	203	Non-halogenated solvent
104	Spent acid without metals	204	Halogenated/non-halogenated solvent mixture
105	Acidic aqueous waste	205	Oil-water emulsion or mixture
106	Caustic solution with metals but no cyanides	206	Waste oil
107	Caustic solution with metals and cyanides	207	Concentrated aqueous solution of other organics
108	Caustic solution with cyanides but no metals	208	Concentrated phenolics
109	Spent caustic	209	Organic paint, ink, lacquer, or varnish
110	Caustic aqueous waste	210	Adhesives or epoxies
111	Aqueous waste with reactive sulfides	211	Paint thinner or petroleum distillates
112	Aqueous waste with other reactives (e.g., explosives)	212	Reactive or polymerizable organic liquids
		219	Other organic liquids (Specify in Comments)
		296	Ethylene glycol based antifreeze

*Appendix G – Form Codes*

Code	Waste Description	Code	Waste Description
297	Nonhazardous liquids containing greater than or equal to (>) 50 and less than (<) 500 ppm PCBs	397	Nonhazardous electrical equipment/devices containing greater than or equal to (>) 500 ppm PCBs
298	Nonhazardous liquids containing greater than or equal to (>) 500 ppm PCBs	398	Nonhazardous soils containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
299	Nonhazardous photographic chemical waste (organic)	399	Nonhazardous soils containing greater than or equal to (>) 500 ppm PCBs
<b>— Solids —</b>			
<i>(These codes do not apply to pumpable waste.)</i>			
<b>Inorganic Solids</b> — Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; <b>not pumpable</b>		<b>Organic Solids</b> — Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; <b>not pumpable</b>	
301	Soil contaminated with organics	401	Halogenated pesticide solid
302	Soil contaminated with inorganics only	402	Non-halogenated pesticide solid
303	Ash, slag, or other residue from incineration of wastes	403	Solids resins or polymerized organics
304	Other “dry” ash, slag, or thermal residue	404	Spent carbon
305	“Dry” lime or metal hydroxide solids chemically “fixed”	405	Reactive organic solid
306	“Dry” lime or metal hydroxide solids not “fixed”	406	Empty fiber or plastic containers
307	Metal scale, filings, or scrap	407	Other halogenated organic solids (Specify in Comments)
308	Empty or crushed metal drums or containers	409	Other non-halogenated organic solids (Specify in Comments)
309	Batteries or battery parts, casings, cores	488	Wood debris
310	Spent solid filters or adsorbents	489	Petroleum contaminated solids
311	Asbestos solids and debris	490	Sand blasting waste
312	Metal-cyanide salts/chemicals	491	Dewatered biological treatment sludge
313	Reactive cyanide salts/chemicals	492	Dewatered sewage or other untreated biological sludge
314	Reactive sulfide salts/chemicals	493	Catalyst waste
315	Other reactive salts/chemicals	494	Solids containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
316	Other metal salts/chemicals	495	Solids containing greater than or equal to (>) 500 ppm PCBs
319	Other waste inorganic solids (Specify in Comments)	496	Electrical equipment/devices containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
388	Empty or crushed glass containers	497	Electrical equipment/devices containing greater than or equal to (>) 500 ppm PCBs
389	Nonhazardous sandblasting waste	498	Soil containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
390	Nonhazardous concrete/cement/ construction debris	499	Soils containing greater than or equal to (>) 500 ppm PCBs
391	Nonhazardous dewatered wastewater treatment sludge		
392	Nonhazardous dewatered air pollution control device sludge	<b>— Sludges —</b>	
393	Catalyst waste	<i>(These codes only apply to pumpable waste.)</i>	
394	Nonhazardous solids containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs	<b>Inorganic Sludges</b> — Waste that is primarily inorganic, with moderate-to-high water content and low organic content, and <b>pumpable</b>	
395	Nonhazardous solids containing greater than or equal to (>) 500 ppm PCBs	501	Lime sludge without metals
396	Nonhazardous electrical equipment/devices containing greater than or equal to (>) 50ppm and less than (<) 500 ppm PCBs	502	Lime sludge with metals/metal hydroxide sludge

*Appendix G – Form Codes*

Code	Waste Description	Code	Waste Description
503	Wastewater treatment sludge with toxic organics		<b>— Gases —</b>
504	Other wastewater treatment sludge		<b>Inorganic Gases</b> — Waste that is primarily inorganic with a low organic content and is a gas at atmospheric pressure
505	Untreated plating sludge without cyanides	701	Inorganic gases
506	Untreated plating sludge with cyanides		<b>Organic Gases</b> — Waste that is primarily organic with low-to-moderate inorganic content and is a gas at atmospheric pressure
507	Other sludge with cyanides	801	Organic gases
508	Sludge with reactive sulfides		<b>— Plant Trash —</b>
509	Sludge with other reactives		<i>(In order to be considered for one of the two plant refuse designations, a waste must first meet the following two criteria.</i>
510	Degreasing sludge with metal scale or filings		<b>First</b> , the waste <b>must</b> be a Class 2 waste. This means that a proper classification determination must be performed for each item which a facility is considering as one of the plant refuse designations. A waste is not a Class 2 solely because it has been designated as a plant refuse waste. <b>Hazardous</b> and <b>Class 1 wastes</b> are <b>not eligible</b> for designation as one of the plant refuses.
511	Air pollution control device sludge (e.g., fly ash, wet scrubber sludge)		<b>Second</b> , the waste must meet the particular definition of the plant refuse term. For more information on these terms, please refer to the terms listed in this table as well as the “Definitions” section which follows this table.)
512	Sediment or lagoon dragout contaminated with organics	902	<b>Supplemental plant production refuse</b> – any Class 2 waste from production, manufacturing, or laboratory operations as long as the total amount of the supplemental plant production refuse does not exceed twenty percent of the total plant trash (form code 999) volume or weight, whichever is less – this could include, but is not limited to, such things as metal parts, floor sweepings, and off-specification materials
513	Sediment or lagoon dragout contaminated with inorganics only	999	<b>Plant Trash</b> – any Class 2 waste originating in the facility offices, laboratory, plant production area or food services/cafeteria operations that is composed of paper, cardboard, linings, wrappings, paper and/or wooden packaging materials, uncontaminated food wastes and/or packaging, cafeteria wastes, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wirings, uncontaminated cloth, metal bindings, empty containers with a holding capacity of less than five gallons, uncontaminated floor sweepings, and personal cosmetics generated by facility personnel (does not include cosmetics generated as a result of manufacturing or plant production operations).
514	Drilling mud		
515	Asbestos slurry or sludge		
516	Chloride or other brine sludge		
519	Other inorganic sludges (Specify in Comments)		
597	Catalyst waste		
598	Nonhazardous sludges containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs		
599	Nonhazardous sludges containing greater than or equal to (>) 500 ppm PCBs		
	<b>Organic Sludges</b> — Waste that is primarily organic with low-to-moderate inorganic solids content and water content, and <b>pumpable</b>		
601	Still bottoms of halogenated (e.g., chlorinated) solvents or other organic liquids		
602	Still bottoms on non-halogenated solvents or other organic liquids		
603	Oily sludge		
604	Organic paint or ink sludge		
605	Reactive or polymerizable organics		
606	Resins, tars, or tarry sludge		
607	Biological treatment sludge		
608	Sewage or other untreated biological sludge		
609	Other organic sludges (Specify in Comments)		
695	Petroleum contaminated sludges other than still bottoms and oily sludges		
696	Grease		
697	Catalyst waste		
698	Nonhazardous sludges containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs		
699	Nonhazardous sludges containing greater than or equal to (>) 500 ppm PCBs		

## Form Code Definitions

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The following are definitions of terms utilized in form codes:

**Acidic** – A material having a pH less than 7.0.

**Alkaline** – A material having a pH greater than 7.0.

**Aqueous** – A water solution containing organic and/or inorganic constituents dissolved in solution.

**Caustic** – A material which is corrosive or irritating to living tissue and has a pH greater than 7.

**Inorganic** – Chemicals that are not organic (i.e., water, carbon dioxide, carbon disulfide, iron, zinc, steel). Generally, if a waste is composed of more than 50% inorganic materials, it is considered an inorganic waste.

**Organic** – Chemicals composed primarily of carbon and hydrogen and their derivatives. (i.e. methylene chloride, benzene, petroleum products). In general, if a waste is composed of 50% or more organic materials, it is considered an organic waste.

**Plant Trash** – Includes the following Class 2 wastes which are produced as a result of plant production, manufacturing, laboratory, general office, cafeteria or food service operations; paper, cardboard, linings, wrappings, paper or wood packaging materials, food wastes, cafeteria wastes, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wirings, uncontaminated cloth, metal bindings, empty containers with a holding capacity of less than five gallons, uncontaminated floor sweepings, and personal cosmetics generated by facility personnel (does not include cosmetics generated as a result of manufacturing or plant production operations). **Please note that hazardous waste and Class 1 waste can not be designated as “plant office refuse”.** Plant trash shall not include oils, lubricants of any type, oil filters, contaminated soils, sludges, or wastewaters.

Examples of “plant trash” include Class 2 soda cans, lunch sacks, food scraps, envelopes, plastic binders, empty boxes, pallets, styrofoam shipping boxes, chemical container liners, shrink wrap, and broken glassware.

As another example, used typing paper from the secretarial area could be considered “plant trash” because it resulted from general office operations. (Please note that typing paper would normally be considered a

Class 2 waste unless it were contaminated with something to cause it to be considered a hazardous or Class 1 waste. For example, if typing paper were used to clean up a spill of a F003 waste, it would be considered a hazardous waste.)

As another example, a Class 2 off-specification production chemical could not be considered “plant trash” because it does not meet the definition of a “plant trash”. However, the Class 2 off-specification production chemical might be considered a “supplemental plant production refuse” as long as the weight/volume limits established for “supplemental plant production refuse” were not exceeded. (For more information on “supplemental plant production refuse” and weight/volume limits, please see “Supplemental Plant Production Refuse” in these definitions.

**Reactive** – A material is reactive if it is capable of detonation or explosive decomposition:

1. at standard temperature and pressure, or
2. if subjected to a strong ignition source, or
3. heated under confinement.

A material is also considered reactive if, when mixed with water it is:

1. potentially explosive, or
2. reacts violently, or
3. generates toxic gases or vapors (i.e. hydrogencyanide or hydrogensulfide).

A material is also considered reactive if it is:

1. normally unstable and readily undergoes violent changes, or
2. a forbidden explosive (see 49 CFR §173.53), or
3. a Class B explosive (see 49 CFR §173.88).

**Solvent** – A liquid used to dissolve another material.

**Supplemental Plant Production Refuse** – Any **Class 2 Waste from production, manufacturing, or laboratory operations** can be designated as “**supplemental plant production refuse**” (form code 999) as long as the total amount of the supplemental plant production refuse **does not exceed twenty percent of the total plant production refuse volume or weight, whichever is less.**

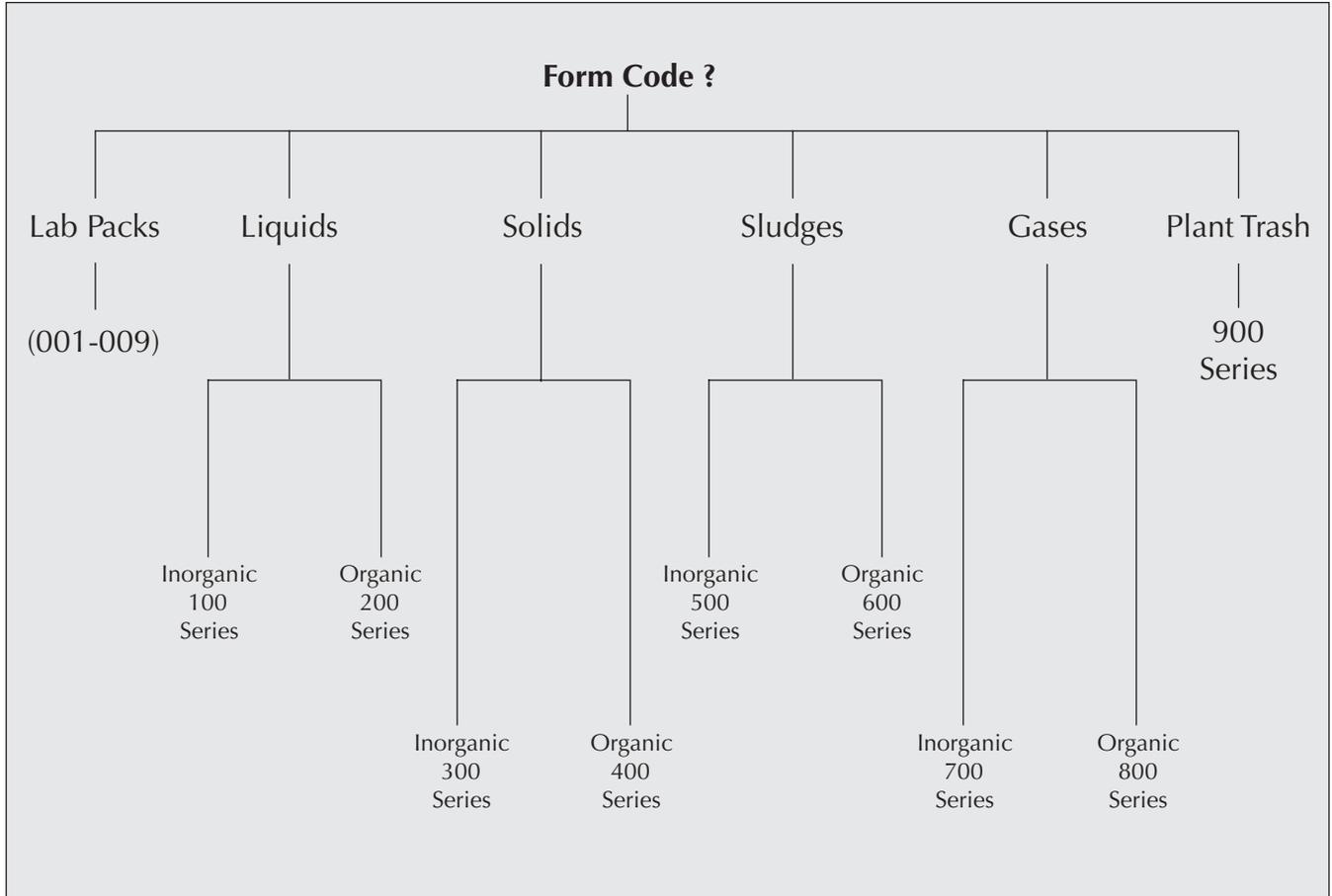
Individual wastes which have been designated “supplemental plant production refuse” may be designated by the generator at a later time as a separate waste in order to maintain the “supplemental plant production refuse” at a level below 20% of the “plant trash” amount. For any waste stream so redesignated, the generator must provide the initial notification information required pursuant to 30 TAC Chapter 335.

## Appendix G – Form Codes

Please note that hazardous waste and Class 1 waste can not be designated as “supplemental plant production refuse”.

Examples of “supplemental plant production refuse” include Class 2 steel shavings, empty metal containers, aerosol cans, old chemicals, safety equipment, and machine parts.

Please note that when a site notifies the Commission that it generates “supplemental plant production refuse”, it must include a list of those wastes which are expected to be included in the “supplemental plant production refuse” designation. If that list increases, the generator must notify the Commission of the additions to that list; otherwise, the Commission will not view the additions as “supplemental plant production refuse”.



### Lab Packs – 001-009 series

Examples:

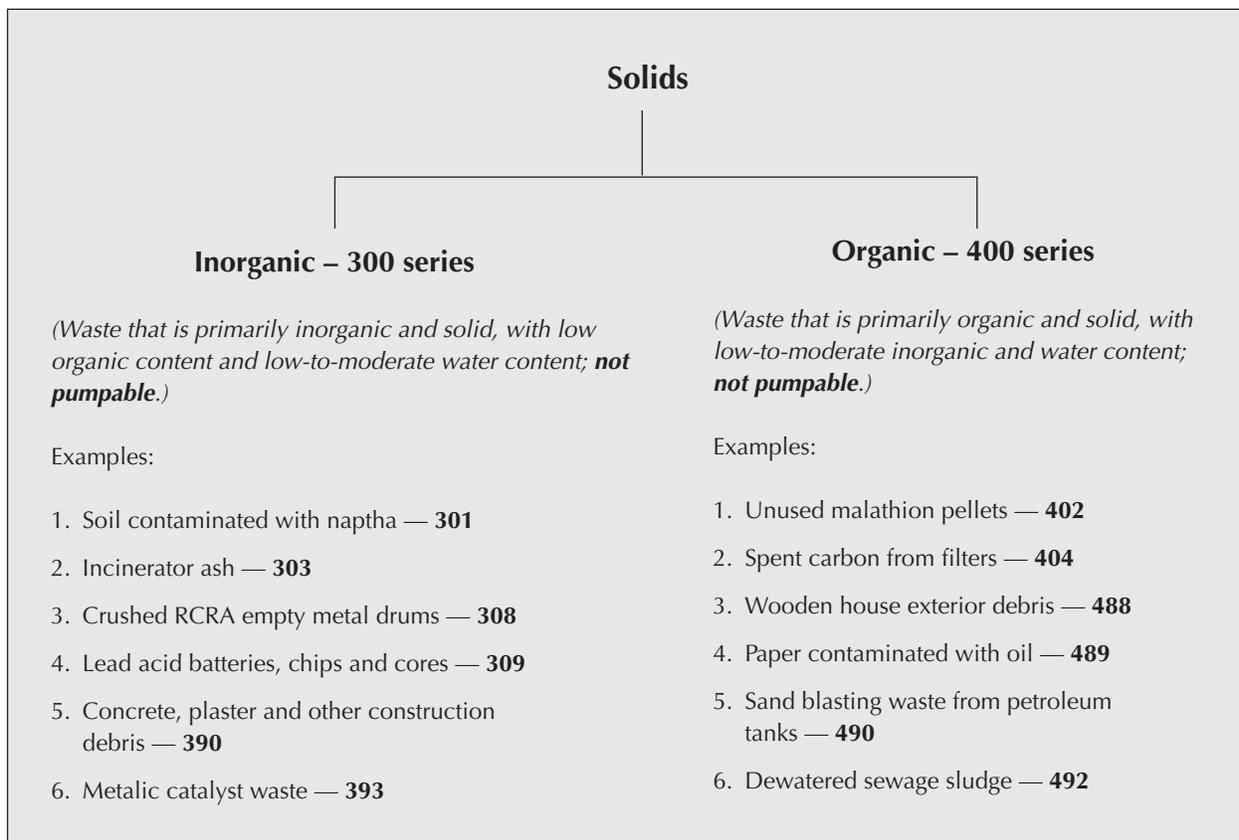
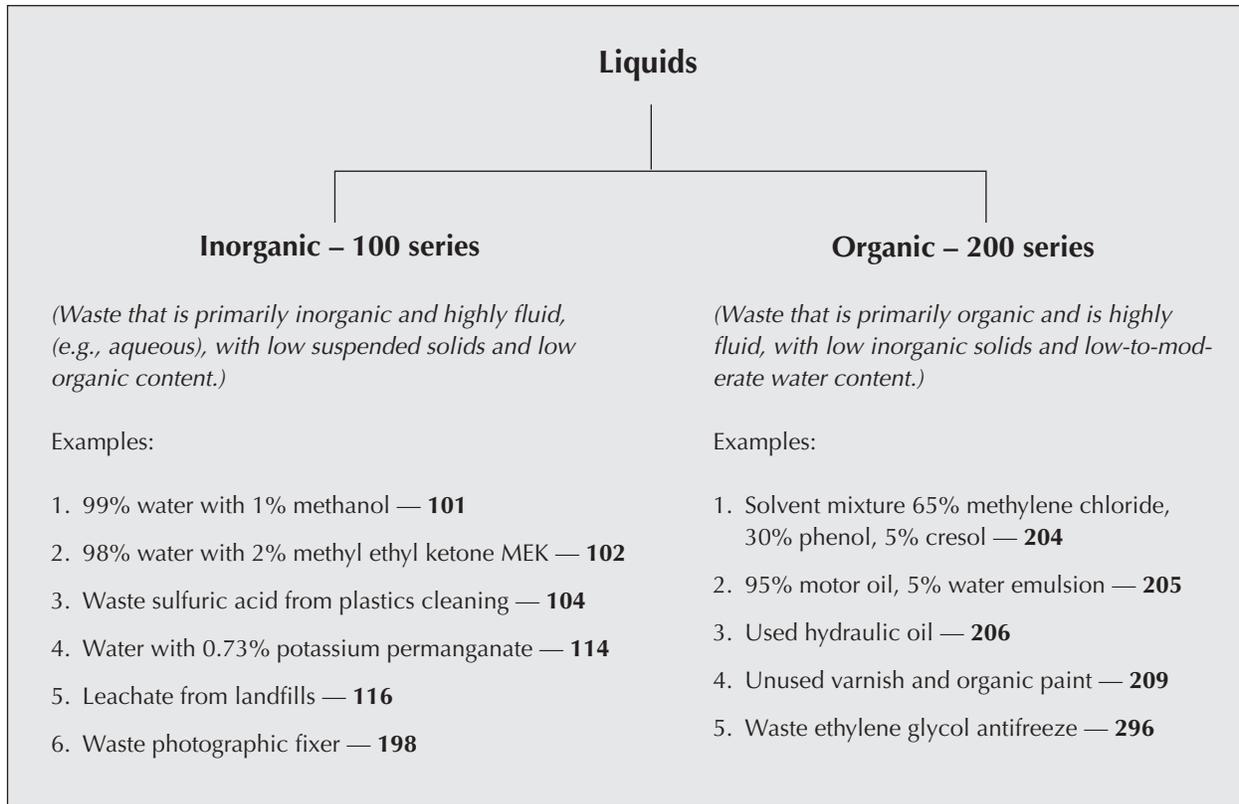
1. Lab pack containing debris — **002**
2. Lab pack containing old unused or partially used chemicals — **001**

### Plant Trash – 900 series

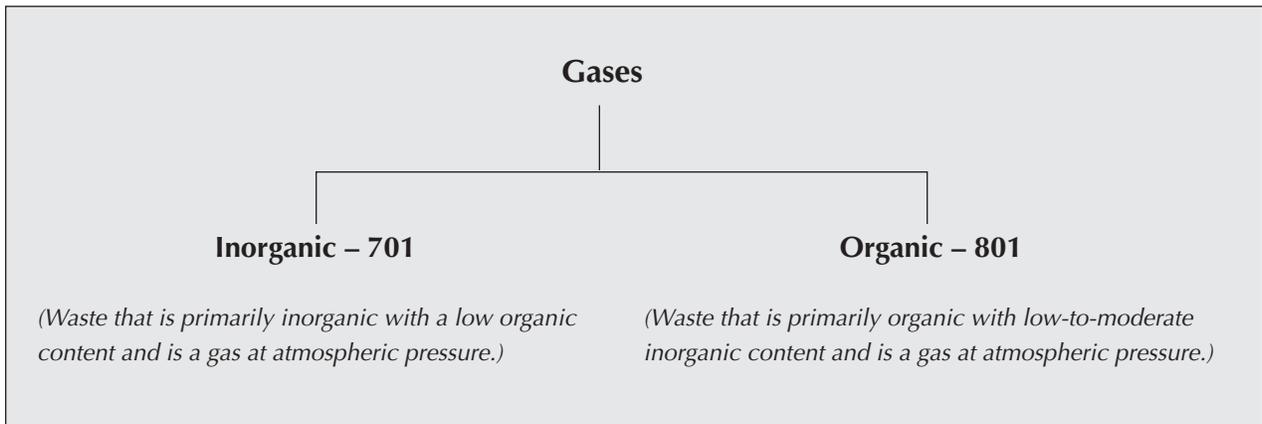
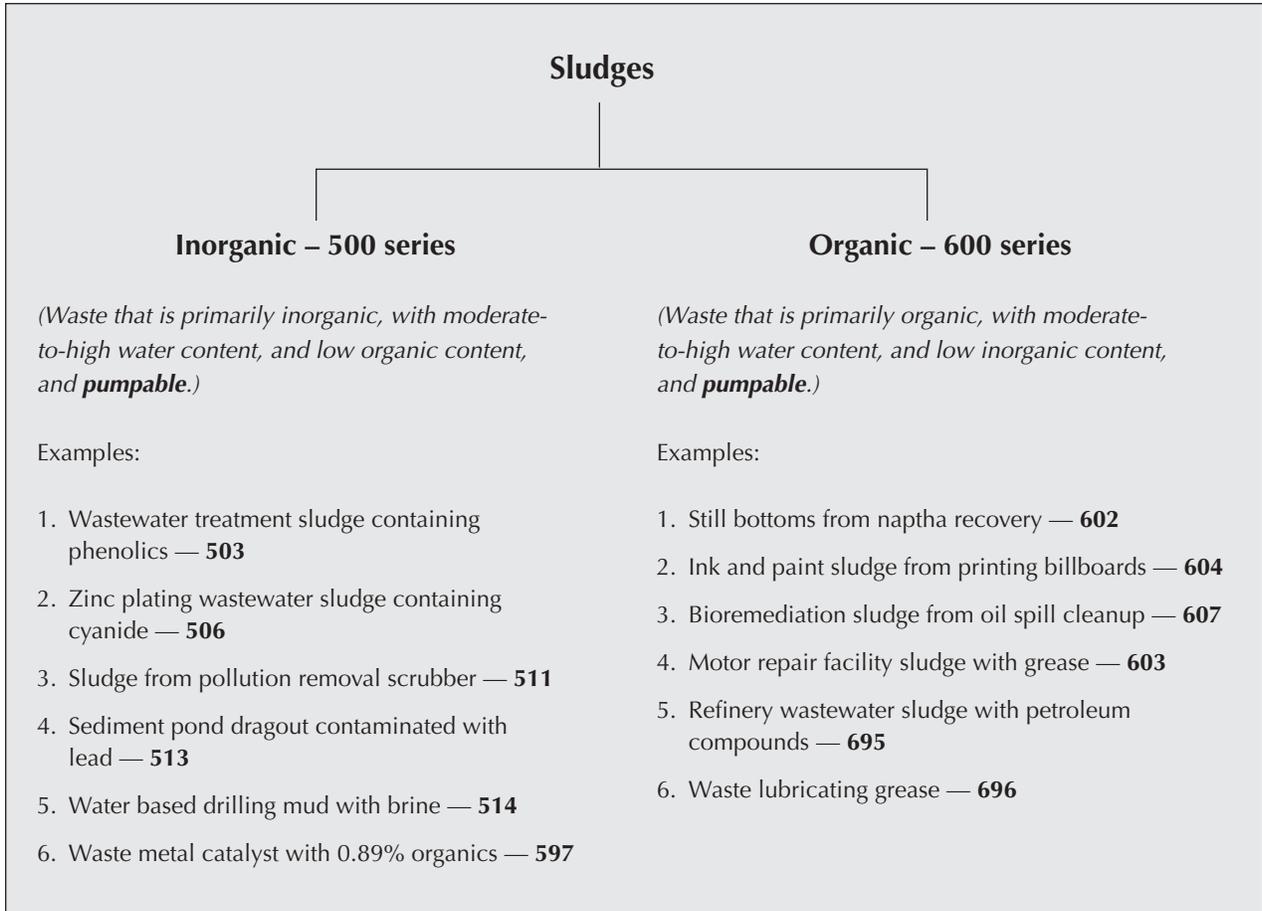
Examples:

1. Office debris (i.e., paper, plastic, aluminum cans and fax paper) — **999**
2. Scrap plastic from molds of toys and souvenirs — **902**
3. Packing debris from unpacking of raw materials — **999**

## Appendix G – Form Codes



Appendix G – Form Codes



# Codes for Out-of-State Waste Generators and Receivers

Codes for States of the United States				Country Codes		
State or Country	Abbreviation	Generator No.	Receiver No.	State or Country	Generator No.	Receiver No.
Alabama	AL	D0001	D0001	American Samoa	D0083	D0083
Alaska	AK	D0002	D0002	Australia	F0095	F0095
Arizona	AZ	D0004	D0004	Austria	F0078	F0078
Arkansas	AR	D0005	D0005	Bahamas Islands	F0002	F0002
California	CA	D0006	D0006	Belgium	F0069	F0069
Colorado	CO	D0008	D0008	Belize	F0091	F0091
Connecticut	CT	D0009	D0009	Brazil	F0086	F0086
Delaware	DE	D0010	D0010	Cambodia	F0001	F0001
Dist. of Columbia		D0011	D0011	Canada	F0063	F0063
Florida	FL	D0012	D0012	Chile	F0007	F0007
Georgia	GA	D0013	D0013	China	F0005	F0005
Hawaii	HI	D0015	D0015	Columbia	F0003	F0003
Idaho	ID	D0016	D0016	Denmark	F0067	F0067
Illinois	IL	D0017	D0017	El Salvador	F0097	F0097
Indiana	IN	D0018	D0018	England	F0064	F0064
Iowa	IA	D0019	D0019	Finland	F0070	F0070
Kansas	KS	D0020	D0020	France	F0076	F0076
Kentucky	KY	D0021	D0021	Germany	F0068	F0068
Louisiana	LA	D0022	D0022	Greece	F0084	F0084
Maine	ME	D0023	D0023	Guam	D0075	D0075
Maryland	MD	D0024	D0024	Haiti	F0093	F0093
Massachusetts	MA	D0025	D0025	Holland	F0079	F0079
Michigan	MI	D0026	D0026	Honduras	F0011	F0011
Minnesota	MN	D0027	D0027	Hong Kong	F0080	F0080
Mississippi	MS	D0028	D0028	India	F0006	F0006
Missouri	MO	D0029	D0029	Italy	F0090	F0090
Montana	MT	D0030	D0030	Jamaica	F0089	F0089
Nebraska	NE	D0031	D0031	Japan	F0062	F0062
Nevada	NV	D0032	D0032	Luxemburg	F0092	F0092
New Hampshire	NH	D0033	D0033	Malaysia	F0077	F0077
New Jersey	NJ	D0034	D0034	Marshall Islands	F0074	F0074
New Mexico	NM	D0035	D0035	Mexico	F0061	F0061
New York	NY	D0036	D0036	Navajo Nation	D0057	D0057
North Carolina	NC	D0037	D0037	Netherlands	F0071	F0071
North Dakota	ND	D0038	D0038	Netherlands Antilles (A,B,C)	F0010	F0010
Ohio	OH	D0039	D0039	Nicaragua	F0094	F0094
Oklahoma	OK	D0040	D0040	Norway	F0081	F0081
Oregon	OR	D0041	D0041	Offshore beyond 12 mi.	F0087	F0087
Pennsylvania	PA	D0042	D0042	Pacific Islands	F0072	F0072
Rhode Island	RI	D0044	D0044	Panama	F0082	F0082
South Carolina	SC	D0045	D0045	Peru	F0085	F0085
South Dakota	SD	D0046	D0046	Puerto Rico	D0060	D0060
Tennessee	TN	D0047	D0047	Saudi Arabia	F0088	F0088
Utah	UT	D0049	D0049	Slovenia	F0009	F0009
Vermont	VT	D0050	D0050	South Africa	F0004	F0004
Virginia	VA	D0051	D0051	Spain	F0065	F0065
Washington	WA	D0053	D0053	Sweden	F0096	F0096
West Virginia	WV	D0054	D0054	Taiwan	F0099	F0099
Wisconsin	WI	D0055	D0055	Thailand	F0008	F0008
Wyoming	WY	D0056	D0056	Trinidad de Tobago	F0098	F0098
				Venezuela	F0073	F0073
				Virgin Islands	D0066	D0066

**RG-029**

**SPECIAL WASTE REGULATIONS IN TEXAS**



# Special Waste Regulations in Texas

Special waste is any solid waste that requires special handling and disposal because of its quantity, concentration, physical or chemical characteristics, or biological properties. Special waste is defined in Title 30 Texas Administrative Code (30 TAC), Chapter 330, 330.3. Special waste that is not specifically identified in 30 TAC 330.171(c) or (d), or 330.173 requires prior written authorization by the TCEQ for disposal. Written authorization for the disposal of a special waste can be obtained in two ways:

1. The generator, with written concurrence from a landfill willing to accept the special waste, may submit a Request for Authorization for Disposal of a Special Waste, agency form TCEQ-0152, along with any supporting documentation, to the Municipal Solid Waste (MSW) Permits Section for review; or
2. the generator may request approval to dispose of a special waste directly from an MSW landfill operator that has an approved Waste Acceptance Plan identified in 330.61(b) that authorizes the acceptance of the specific special waste as set out in 330.171(b)(2).

**Special wastes identified in, and meeting the requirements of, 30 TAC 330.171(c) and (d) do not require prior written authorization before disposal, provided the MSW landfill is permitted to accept these wastes. These include:**

- Municipal hazardous waste from conditionally exempt small-quantity generators may be accepted at a Type I or Type IAE landfill provided the amount of waste does not exceed 220 lb (100 kg) per month per generator.
- Municipal wastewater treatment plant sludges, other types of domestic sewage treatment plant sludges, and water-supply treatment plant sludges.
- Liquid wastes from municipal sources that are treated or processed to eliminate free liquids and tested in accordance with 30 TAC 330.171(c)(7).
- Grease-trap and grit-trap wastes.
- Slaughterhouse wastes.
- Dead animals.
- Empty pesticide (insecticide, herbicide, fungicide, or rodenticide) containers that have been triple rinsed and rendered unusable.

- Certain discarded materials containing asbestos as detailed in 30 TAC 330.171(c)(3) and (4). Regulated asbestos-containing material may be accepted for disposal at a Type I or Type IAE landfill. Nonregulated asbestos-containing materials (non-RACM) may be accepted for disposal at a Type I, Type IAE, Type IV, or Type IVAE landfill. For further information regarding asbestos abatement, contact the Asbestos Programs Branch of the Texas Department of State Health Services Toxic Substance Control Division at 512-834-6600 or 800-572-5548.

**Special wastes that do require prior written authorization include:**

- Untreated medical waste may be approved for disposal by the executive director when necessary to protect human health and the environment from the effects of a natural or man-made disaster.
- Class 1 nonhazardous industrial solid waste not routinely collected with municipal solid waste. (Also see the requirements of 30 TAC 330.173.)
- Wastes from commercial or industrial wastewater treatment plants; air pollution control facilities; and tanks, drums, or containers used for shipping or storing any material that has been listed as a hazardous constituent in 40 CFR, Part 261, Appendix VIII but has not been listed as a commercial chemical product in 40 CFR, 261.33(e) or (f).
- Drugs, contaminated foods, or contaminated beverages, other than those contained in normal household waste.
- Incinerator ash.
- Soil contaminated by petroleum products, crude oil, or chemicals in concentrations of greater than 1,500 milligrams per kilogram total petroleum hydrocarbons; or contaminated by constituents of concern that exceed the concentrations listed in Table 1 of 335.521(a)(1) of this title (relating to Appendices). Such contaminated soil must be disposed of in accordance with 330.171(b)(4).
- Waste from oil, gas, and geothermal activities subject to regulation by the Railroad Commission of Texas when those wastes are to be processed, treated, or disposed of at a municipal solid waste management facility permitted under Chapter 330.
- Waste generated outside the boundaries of Texas that contains:
  - Any industrial waste;
  - Any waste associated with oil, gas, or geothermal exploration, production, or development activities; or
  - Any item listed as a special waste in 30 TAC 330.3.

**The following special wastes are prohibited from disposal in an MSW landfill:**

- Used oil filters from internal combustion engines. Used oil filters are prohibited from disposal at MSW landfills by non-household generators by 30 TAC 330.171(d).
- Lead-acid storage batteries. Lead-acid storage battery disposal is prohibited at MSW landfills by 30 TAC 330.15(e).

**Management and disposal options for special waste:**

1. **Asbestos:** There are two types of asbestos waste—regulated (friable) and non-regulated (not friable) asbestos-containing material (RACM and non-RACM) as defined in 40 CFR Part 61 Section 141. Also, the amount of asbestos in the material contributes to the type of asbestos waste. Non-RACM may become RACM if subject to sanding, grinding, cutting, or abrading, or it has a high probability of being reduced to powder during demolition or renovation.
  - a. RACM is friable asbestos-containing material that contains greater than 1 percent asbestos. Friable is defined as asbestos-containing material that, when dry, can be crushed to a powder by hand pressure. RACM may be disposed of at a Type I or Type I arid exempt (AE) MSW landfill in accordance with 30 TAC 330.171(c)(3).
  - b. Non-RACM is material containing less than one percent asbestos or non-friable asbestos-containing material not identified as regulated. Non-RACM may be disposed of at any MSW landfill provided the facility is authorized to accept the waste in accordance with 30 TAC 330.171(c)(4).
2. **Grease-trap waste:** Material collected in and from a grease interceptor in the sanitary sewer service line of a commercial, institutional, or industrial food service or processing establishment, including the solids resulting from dewatering processes. Grease-trap waste may be from municipal sources and regulated under 30 TAC Chapter 330 or from industrial sources and regulated under 30 TAC Chapter 335. Industrial-waste generators must classify their waste in accordance with Subchapter R of 30 TAC Chapter 335. Grease-trap waste must be transported to an authorized facility which can be a processing or treatment facility, a liquid waste transfer station, or an MSW landfill. Grease-trap waste may also be processed on-site by mobile treatment or processing units. In order for grease-trap waste to be disposed of in an MSW landfill, the waste must pass the paint filter test, Method 9095. Some MSW landfills have liquid-waste solidification units and will process such waste prior to disposal.
3. **Grit-trap waste:** Includes waste from interceptors placed in the drains prior to entering the sewer system at maintenance and repair shops, automobile service stations, car washes, laundries,

and other similar establishments and is regulated under Chapters 330 and 335 in the same manner as grease-trap waste. Grit-trap waste must be transported to an authorized facility which can be a processing or treatment facility, a liquid waste transfer station, or an MSW landfill. Grit-trap waste may also be processed on-site by mobile treatment or processing units. In order for grit-trap waste to be disposed of in an MSW landfill, the waste must pass the paint filter test, Method 9095. Grit-trap waste from car washes may be dried on-site or at a location within 50 miles of generation that is owned by the generator and then disposed of at an authorized facility.

4. **Domestic septage:** Includes liquid and solid material pumped from a septic tank, cesspool, or similar sewage-treatment system and is regulated under 330 in the same manner as grease- and grit-trap waste, but is also subject to Chapter 312 of 30 TAC if used beneficially by land applying. Septage waste must be transported to an authorized facility which can be a wastewater treatment plant, a beneficial land-use site, an MSW processing facility or transfer station, a compost facility, a monofill (sludge only) landfill, or an MSW Type I landfill, or septage may be processed on-site by a mobile unit. Septage waste that is transported to a beneficial land-use site or a monofill must be treated by raising the pH of the waste to 12 for a period of 30 minutes. This treatment is usually performed in the transport unit by adding lime and is the only treatment process allowed for transporters. In addition, septage waste must meet the metal concentration requirements of 30 TAC 312.43 prior to beneficial land application. Like grease- and grit-trap waste, septage waste must pass the paint filter test prior to disposal in an MSW landfill or monofill.
5. **Liquid waste transporter requirements:** All transporters of liquid waste—including grease-trap, grit-trap, and septage waste—must be registered with the TCEQ. Transporters are required to manifest shipments of liquid waste in the form of a trip ticket that identifies the generator, the transporter, and the disposal facility. The transporter is required to provide the generator with the first copy of the trip ticket; after delivery, the transporter must provide the generator the completed fourth copy, which verifies that the disposal facility received the shipment of liquid waste. Transporter companies are required to maintain records of all shipments of liquid waste for five years.
6. **Liquid waste generator requirements:** Generators are responsible for the proper treatment and disposal of their waste. Generators must contract with a TCEQ-registered liquid-waste transporter and must receive a copy of the signed trip ticket from the transporter. The generator must also receive a second signed copy of the trip ticket with the treatment or disposal facility signature and information and must maintain trip-ticket records for three years. Industrial liquid-waste generators are responsible for properly

classifying their waste under Subchapter R of 30 TAC Chapter 335.

7. The following wastes pose a greater potential for objectionable odor. These wastes should be managed and transported to contain odor and then covered immediately at an MSW landfill:
  - a. liquid waste
  - b. grease-trap and grit-trap waste
  - c. slaughterhouse waste
  - d. dead animals
  - e. sludges resulting from wastewater (and possibly water) treatment
8. Wastes which may cause a windblown particulate nuisance condition should be covered immediately at an MSW landfill.

For additional information or questions regarding the disposal of special waste, please contact the Municipal Solid Waste Permits Section of the TCEQ at 512-239-2334 or e-mail inquiries to <mswpermits@tceq.state.tx.us>.

**RG-486**

**DISPOSAL OF EXEMPT WASTE THAT CONTAINS RADIOACTIVE MATERIAL**



RG-486  
November 2010

# Disposal of Exempt Waste That Contains Radioactive Material

Radioactive Materials Division

printed on  
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



# **DISPOSAL OF EXEMPT WASTE THAT CONTAINS RADIOACTIVE MATERIAL**

Prepared by  
Radioactive Materials Division

RG-486  
November 2010



**Bryan W. Shaw, Ph.D.,** *Chairman*  
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Published and distributed  
by the  
Texas Commission on Environmental Quality  
PO Box 13087  
Austin TX 78711-3087

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# **DISPOSAL OF EXEMPT WASTE THAT CONTAINS RADIOACTIVE MATERIAL**

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# ABBREVIATIONS AND SYMBOLS

## Abbreviations

CFR	Code of Federal Regulations
DL	detection limit
dpm	disintegrations per minute
DSHS	(Texas) Department of State Health Services
DOT	(U.S.) Department of Transportation
LLD	lower limit of detection
MDA	minimum detectable activity
MSW	municipal solid waste
NELAC	National Environmental Laboratory Accreditation Conference
NORM	naturally occurring radioactive material
NRC	(U.S.) Nuclear Regulatory Commission
RRC	Railroad Commission of Texas
SI	International System of units, from the French <i>Le Système Internationale d'Unites</i>
SS&D	sealed source and device
TAC	Texas Administrative Code 30 TAC <i>xx</i> = "Title 30, Texas Administrative Code, Chapter (Section, etc.) <i>xx</i> "
TCEQ	Texas Commission on Environmental Quality
THSC	Texas Health and Safety Code

## Symbols

%	percent
4E-2	$4 \times 10^{-2}$ (actual number shown as an example)

Bq	becquerel (1 disintegration per second)
Ci	curie ( $3.7 \times 10^{10}$ disintegrations per second)
cm	centimeter
GBq	gigabecquerel (1 million disintegrations per second)
J	joule (unit of energy)
kBq	kilobecquerel (1,000 disintegrations per second)
m <sup>2</sup>	square meter
mg/cm <sup>2</sup>	milligram per square centimeter
pCi/g	picocurie per gram (0.037 disintegrations per second per gram)
rad	The special unit of absorbed dose equal to an absorbed dose of 0.01 J/kg.
rem	Unit of dose equivalent equal to the absorbed dose in rad multiplied by the quality factor (1 rem = 0.01 sievert).
s	second
Si	sievert: SI unit of dose equivalent equal to the absorbed dose in J/kg (grays) multiplied by the quality factor
T	tritium (Hydrogen-3)
yd <sup>3</sup>	cubic yard





# 1 INTRODUCTION

This guide explains and clarifies the instances where radioactive materials can be exempted from the standard disposal requirements for radioactive wastes. If radioactive materials meet the criteria detailed in this guide, the TCEQ may issue an exemption for the materials. If a radioactive material is exempted, it can be disposed of as if it was not a radioactive material—e.g., if the material would be municipal solid waste if it were not radioactive, then it can be disposed of in an authorized municipal solid waste disposal facility when it receives an exemption. Radioactive waste is exempt from regulations when it poses a reasonably low risk to public health and safety and the environment. *Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials* (NRC, 2001) contains the calculations and methodology used to assess the potential radiation doses associated with the exemption regulations for the normal life cycle, which includes final disposal.

Despite its radioactive content, exempt materials do not need to be sent to a facility that is licensed for radioactive waste disposal [25 TAC 289.101(o)].<sup>1</sup> The disposal of exempt material **as a radioactive substance** is not subject to further regulation by the TCEQ, though the material will still be regulated for other non-radioactive constituents. If it does not meet the exemption criteria, then it must be disposed of in the manner stipulated in 30 TAC 336.211, as appropriate to the type of licensed material.

Before accepting exempt materials, a disposal facility may require a letter from the TCEQ stating that the waste meets the exemption criteria found in the regulations and is thereby exempt from other regulations concerning radioactive-waste disposal. This statement from the TCEQ is called an *exemption concurrence*. Some hazardous-waste disposal facilities regulated by the TCEQ have a condition in their permit requiring them to obtain an exemption concurrence before disposing of exempt materials.

This guide focuses on the disposal of exempt material in TCEQ-regulated disposal facilities: the agencies in Texas that have authority over exempt materials, what materials are exempt, the TCEQ regulations over exempt materials, and what documentation and analysis are required to determine whether the material meets the TCEQ's exemption requirements. Several terms are defined in Appendix A, tables containing exemption-activity values from the regulations are reproduced in Appendix B, and a primer on radiation appears in Appendix C.

---

<sup>1</sup> Short for 'Title 25, Texas Administrative Code, Subsection 289.101(o).'

This guide summarizes the TCEQ rules and regulations concerning exempt materials to assist waste generators and disposal facilities. The rules in the Texas Administrative Code should always be reviewed. The rules will form the ultimate basis for granting an exemption concurrence. If any wording of this guide conflicts with the code, then the code takes precedence.

## 2 REGULATORY BASIS

### 2.1 State Agencies that Regulate Radioactive Material

Three state agencies regulate the handling, processing, transporting, transferring, receiving, storage, and disposal of radioactive material in Texas: the TCEQ, the Texas Department of State Health Services (DSHS), and the Railroad Commission of Texas (RRC).

#### The Department of State Health Services

(<[www.dshs.state.tx.us/radiation/](http://www.dshs.state.tx.us/radiation/)> regulates and licenses the possession, receipt, use, handling, transfer, transport, and storage of all radioactive material except for the radioactive material specifically regulated under the authority of the RRC and the TCEQ. Additionally, the DSHS registers radiation-producing equipment and operates the radiological emergency-response program for Texas. The radiation rules of the DSHS appear at 25 TAC 289. All exemption concurrences for waste that was generated under a DSHS radioactive-material license must be obtained from the DSHS.

#### The Railroad Commission of Texas

<[www.rrc.state.tx.us/environmental/publications/norm.php](http://www.rrc.state.tx.us/environmental/publications/norm.php)> has authority over uranium exploration, surface mining, and handling and disposal of naturally occurring radioactive-material (NORM) wastes produced during the exploration and production of oil and gas. The radiation rules of the RRC can be found at 16 TAC 4 for NORM and 16 TAC 11 for uranium mining. Any exemption concurrences for NORM waste at oil- and gas-production sites must be obtained from the RRC.

#### The Texas Commission on Environmental Quality

<[www.tceq.state.tx.us/nav/permits/rw.html](http://www.tceq.state.tx.us/nav/permits/rw.html)> regulates and licenses the following:

- Receipt, processing, storage and disposal of by-product and low-level radioactive waste from other “persons,” which is defined as to include organizations such as companies or institutions.
- Uranium- and thorium-recovery facilities and the disposal of uranium and thorium by-product wastes.
- Decommissioning of inactive uranium-recovery facilities and sites for the disposal of radioactive material.

The TCEQ radiation rules can be found at 30 TAC 336. Exemption concurrences for waste generated in Texas that was not generated under the authority of the DSHS or the RRC must be obtained from the TCEQ. Exemption

concurrences for waste generated outside of Texas, but to be disposed of in Texas, also must be obtained from the TCEQ.

## 2.2 TCEQ Regulations Concerning Exemptions

The use and disposal of radioactive materials in Texas is governed by Texas Health and Safety Code Chapter 401. The authorization and rules concerning exempt materials appear at THSC 401.106(a). Specific regulations concerning the criteria that materials containing radioactivity must meet to qualify for an exemption are described below, and are mostly found at 25 TAC 289.251 and 289.259. These exemption regulations are based on federal regulations promulgated by the NRC which require that agreement states have essentially identical language in their state rules.

Exemptions are promulgated by the TCEQ under 30 TAC 336.5. Most exemption concurrences are granted under 30 TAC 336.5(c), which exempts waste from licensing requirements under THSC 401.106(a), thus authorizing the TCEQ to use the exemption rules from the DSHS, such as 25 TAC 289.251(d), 251(e), and 259(d). *See* 25 TAC 289.101(c)(2) and (o).

Senate Bill 1604 of the 80th regular legislative session transferred the authority over processing and storage of uranium, by-product, and radioactive waste from the DSHS to the TCEQ, effective June 15, 2007. That bill also transferred the responsibility to grant exemption concurrences from the DSHS to the TCEQ. SB 1604 is reflected in 30 TAC 336.5(d), which exempts any material exempted from licensing requirements for disposal by the DSHS before June 18, 2007.

## 2.3 Additional Regulatory Considerations

### 2.3.1 NRC Alternate Disposal Authorizations

The NRC has an additional option for exempting radioactive material under Title 10, Code of Federal Regulations (10 CFR) 20.2002, which states are not required to adopt into their own regulations. This federal rule is not in the Texas code and cannot exempt a waste for disposal in Texas.

### 2.3.2 Dilution Not Allowed to Change Waste Class

Texas does not allow dilution for reduction of the radioactive concentration so that the waste classification is lowered or disposal requirements lessened [30 TAC 336.229]. The TCEQ will not grant an exemption concurrence to any

waste that was diluted so that it would meet the criteria. Waste that has been diluted due to stabilization, mixing, or treatment will be subject to the disposal regulations according to its pre-dilution concentration.

### ***2.3.3 Department of Transportation Exempt Material***

The U.S. Department of Transportation also has a category called *exempt radioactive material*. However, the DOT exemption rules regulate only how such material is to be transported, not how it is to be used or disposed of. DOT policy differs from the NRC exempt-material rules, and consequently the Texas rules. Therefore, this category only applies to issues related to transportation.

### ***2.3.4 Use of Standard International Units***

Additionally, whenever exemption limits are stated using both the units *curie* and *becquerel* in the regulations, the becquerel values are to be used. In such cases, the becquerel value is the legal limit, while the curie value is also stated in the rule since the curie is most widely used in the United States. The curie value is only an approximation of the becquerel unit due to rounding.

### **3 EXEMPTION RULES FOR RADIOACTIVE-MATERIAL LICENSEES ONLY**

A radioactive-material licensee may dispose of the following licensed material exhibiting radioactivity as though it were exempt material. These exemptions apply only to licensees for the waste generated under authority of their radioactive-material license. Disposal of these materials is typically performed as one of several licensed activities (approved by the appropriate regulating agency in the license application and amendment reviews) and verified by inspections from the appropriate regulatory agency—not through an exemption concurrence. Occasionally, though, disposing of this material as exempt does require an exemption concurrence.

A licensee cannot exceed specific contamination limits for soil, facilities, or equipment in 25 TAC 289.202(eee) and 30 TAC 336.356. Contamination that exceeds those limits must be remediated and will not be considered exempt if left in place for unrestricted use. However, if removed for disposal, the contaminated soil, building rubble, or equipment may be considered exempt for disposal only. This rule applies to both specific licensees and general licensees. (General licenses are under the authority of the DSHS; the rules concerning them appear at 25 TAC 289.251.) However, the exemption rules discussed in this section may not apply to a general licensee and additional clarification should be obtained in such situations by contacting the appropriate regulatory agency.

#### **3.1 Release into Sanitary Sewerage: 30 TAC 336.215**

A licensee may discharge licensed material below specified activity levels into a sewer system (“sanitary sewerage”) if the material is either readily soluble in water or is readily dispersible biological material. The quantity released into the sewer in one month divided by the average monthly volume of water released into the sewer cannot exceed the concentration values listed in Table III of 30 TAC 336.359 (values in this table can be found in Table B.1 in Appendix B). The sum-of-fractions rule (see Appendix A for definition) applies if more than one radionuclide is released.

The total activity released in one year may not exceed:

- 5 Ci (185 GBq) of hydrogen-3 (tritium),
- 1 Ci (37 GBq) of carbon-14, and
- 1 Ci (37 GBq) of all other radioactive materials combined.

### **3.2 Disposal of Hydrogen-3, Carbon-14, and Iodine-125 in Specific Media: 30 TAC 336.225(a) and (b), with qualifying rules at (e) and (f)**

A licensee may dispose of the following licensed material as if it were not radioactive but not in a manner that would permit its use either as food for humans or as animal feed:

- 0.05  $\mu\text{Ci}$  (1.85 kBq), or less, of hydrogen-3, carbon-14, or iodine-125 per gram of medium used for liquid scintillation counting or in vitro clinical or in vitro laboratory testing.
- animal tissue containing 0.05  $\mu\text{Ci}$  (1.85 kBq), or less, of hydrogen-3, carbon-14, or iodine-125 per gram, averaged over the weight of the entire animal.

To qualify for this disposal exemption, the licensee must:

- perform surveys adequate to assure that the specified limits are not exceeded [336.225(e)(1)];
- remove or otherwise obliterate or obscure all labels, tags, or other markings which would indicate that the material or contents are radioactive [336.225(e)(2)]; and
- maintain records in accordance with 30 TAC 336.338 [336.225(f)].

### **3.3 The 300-Day Rule: 30 TAC 336.225(c)**

A licensee may, if approved by the appropriate licensing authority (either the DSHS or the TCEQ), dispose of licensed material listed in 30 TAC 336.365 (and also in Table B.2 in Appendix B) in a Type I municipal solid-waste facility (as defined in TCEQ rules, 30 TAC 330) under the following provisions. The sum-of-fractions rule applies if more than one radionuclide is present. The rule is referred to as the “300-day” rule since the isotopes identified in 30 TAC 336.365 have a half-life under 300 days. The licensed material:

- cannot be hazardous waste, nor combined with hazardous waste, as defined at 30 TAC 330
- must not exceed the specified concentration and annual activity limits in 30 TAC 336.365, Appendix H (see Table B.2)
- must comply with all other requirements for disposals at a Type I municipal solid waste facility and any other requirements for those facilities as set forth in 30 TAC 330

If the material is hazardous waste or is combined with hazardous waste, then it must be disposed of at a hazardous waste disposal facility in accordance with TCEQ rules at 30 TAC 335. The licensee must:

- perform surveys adequate to assure that the specified limits are not exceeded [336.225(e)(1)]
- remove or otherwise obliterate or obscure all labels, tags, or other markings which would indicate that the material or contents are radioactive [336.225(e)(2)]
- maintain records in accordance with 30 TAC 336.338 [336.225(f)]
- submit a copy of the following procedures to TCEQ (or DSHS if it is a DSHS licensee) [336.225(d)]:
  - physical delivery of the material to the disposal facility
  - compliance surveys to be performed
  - maintaining secure packaging during transportation to the site
  - maintaining records of any disposals made under 30 TAC 336.225(d)

### **3.4 Decay in Storage: 30 TAC 336.211(a)(3)**

Decay in storage is authorized in the regulations “according to law.” This authorization is mainly used by medical institutions, licensed by DSHS, for short-lived radionuclides—with half-lives below 120 days—used in nuclear medicine, such as metastable technetium-99, xenon-133, and fluorine-18.

### **3.5 Release of Sites for Unrestricted Use: 30 TAC 336.603 and 336.356**

If a site has been released for unrestricted use (also known as *clean release*), then it has been released from regulatory authority for radioactive material. The soil that remains in place at this site released for unrestricted use does not need an exemption concurrence to be considered exempt. However, if contaminated soil has been removed from the site before the declaration of release for unrestricted use, the soil may not be exempt, and an exemption-concurrence request would need to demonstrate that the soil meets the exemption criteria stipulated in the regulations.

A site meets the unrestricted-use requirement if the residual radioactivity distinguishable from background radiation results in a total effective-dose equivalent of 25 mrem (0.25 mSv) per year or less to an average member of the critical group [30 TAC 336.603]. Additional activity requirements are stated in 30 TAC 336.356(a) for radium. The activity of radium-226 or radium-228 in soil, based on dry weight and averaged over any 100 square meters of area, is not to exceed 5 pCi/g averaged over the first 15 centimeters of soil below the surface and 15 pCi/g averaged over each 15 cm-thick layer of soil below the first 15 centimeters beneath the surface. Also, radium-226 or

radium-228 activities in vegetation are not to exceed 5 pCi/g, based on dry weight.

All remediation and cleanup activities need the approval of the appropriate regulatory agency, which has the authority to determine if a site meets the requirements of unrestricted use.

### 3.6 Release for Unrestricted Use of Surface Contaminated Objects: 30 TAC 336.605

The release for unrestricted use of facilities, equipment, or materials with surface contamination is allowed if the radioactive surface contamination levels are below the limits specified in 30 TAC 336.364, Appendix G, which are replicated in Table 1 below. If it has been released for unrestricted use (through procedures approved by the regulatory license reviewers and inspectors), then it has been released from regulatory authority for radioactive material and does not need an exemption concurrence to be exempt.

Table 1. Acceptable Surface Contamination Levels from 30 TAC 336.364

Radionuclide	Average	Maximum	Removable
U-natural, U-235, U-238, and associated decay products except Ra-226, Th-230, Ac-227, and Pa-231	5,000 dpm alpha/100 cm <sup>2</sup>	15,000 dpm alpha/100 cm <sup>2</sup>	1,000 dpm alpha/100 cm <sup>2</sup>
Transuranics, Ra-223, Ra-224, Ra-226, Ra-228, Th-natural, Th-228, Th-230, Th-232, U-232, Pa-231, Ac-227, Sr-90, I-125, I-126, I-129, I-131, and I-133	1,000 dpm/100 cm <sup>2</sup>	3,000 dpm/100 cm <sup>2</sup>	200 dpm/100 cm <sup>2</sup>
Beta-gamma emitters (radionuclides with decay modes other than alpha emission or spontaneous fission) except Sr-90 and others noted above	5,000 dpm beta-gamma/100 cm <sup>2</sup>	15,000 dpm beta-gamma/100 cm <sup>2</sup>	1,000 dpm beta-gamma/100 cm <sup>2</sup>

Porous materials (e.g., concrete), before being released for unrestricted use, must be evaluated to determine whether radioactive contamination has penetrated to the interior of the material. If so, an average concentration, in picocuries per gram, must be determined by the facility, subject to TCEQ review. This interior contaminated porous material may be exempt if the radionuclide concentrations do not exceed the exemption limits specified in the regulations.

## 4 NATURALLY OCCURRING RADIOACTIVE MATERIAL

### 4.1 Definitions

NORM is any substance that naturally contains one or more radionuclides. Under 25 TAC 289.259(c)(4), NORM is naturally occurring material not regulated under the Atomic Energy Act which has had its radionuclide concentrations increased by, or as a result of, human practices. NORM does not include the natural radioactivity of rocks or soils, or background radiation, but instead refers to material which has had its radioactivity concentrated by controllable practices (or by past human practices).

The DSHS and the TCEQ have slightly different definitions of NORM in their rules. The DSHS definition is used for exemption concurrences, since the exemption rules are mostly contained in the DSHS regulations. The TCEQ definition can be found at 30 TAC 336.2(83): a solid, liquid, or gaseous material or combination of materials, excluding source material, special nuclear material, and by-product material, that

- in its natural physical state spontaneously emits radiation,
- is discarded or unwanted, and
- is not exempt under rules of the DSHS adopted pursuant to THSC 401.106.

Natural radioactivity is defined in 25 TAC 289.201(b)(63) as radioactivity of naturally occurring nuclides whose location and chemical and physical form have not been altered by humans.

### 4.2 Sources of Naturally Occurring Radioactivity

Naturally occurring radioactivity can be divided into two categories: *cosmogenic* and *primordial*. Cosmogenic radioactivity consists of radionuclides formed by interaction of cosmic rays with atoms in the atmosphere, which include carbon-14 (with a half-life of 5,715 years), tritium or hydrogen-3 (12.32 years), sodium-22 (2.6 years), and beryllium-7 (53 days).

Primordial radioactivity consists of radionuclides with half-lives over hundreds of millions of years that were present at the formation of the Earth, which include potassium-40, rubidium-87, uranium, and thorium. Uranium and thorium (the *parent* nuclides) decay into shorter-lived radionuclides

(*daughter* nuclides) such as radium and radon. Since the half-life of the parent is much larger than the half-lives of the daughters, the activity of each daughter approaches the activity of the parent after a time period approximately equal to five times the daughter's half-life. This is called secular equilibrium and results in an increase of the total activity of the material beyond the activity of the uranium or thorium alone. The three main decay chains of uranium and thorium, along with the daughters formed, are listed in the order in which they are formed in Table 2.

Since parent and daughter nuclides are different elements and thus have different chemical properties, they are often separated when the material containing them is processed. For example, NORM waste from the oil-and-gas industry either has radium as its main radionuclide of concern (from process water, scale, and sludge at exploration sites) or contains mainly lead-210 and its decay daughters, bismuth-210 and polonium-210 (typically found inside gas-processing equipment). Radium and lead were combined under the ground before being pumped up and processed.

Table 2. Uranium-238, Uranium-235, and Thorium-232 natural radioactivity decay chains

Radioisotope	Half-life <sup>a</sup>	Radioisotope	Half-life <sup>a</sup>	Radioisotope	Half-life <sup>a</sup>
uranium-238	4.5 By	uranium-235	0.7 By	thorium-232	14 By
thorium-234	21.4 d	thorium-231	25.6 y	radium-228	6.7 y
protactinium-234 (metastable)	1.2 m	protactinium-231	34,300 y	actinium-228	6.1 h
uranium-234	245,500 y	actinium-227	21.8 y	thorium-228	1.9 y
thorium-230	77,000 y	thorium-227	18.4 d	radium-224	3.6 d
radium-226	1,600 y	francium-223	21 m	radon-220	55 s
radon-222	93.8 d	radium-223	11.7 d	polonium-216	0.15 s
polonium-218	3.1 m	radon-219	3.9 s	lead-212	10.6 h
lead-214	26.8 m	polonium-215	0.002 s	bismuth-212	60.6 m
bismuth-214	19.7 m	lead-211	36.1 m	thallium-208	3.0 m
polonium-214	0.0002 s	bismuth-211	2.16 m	lead-208	stable
lead-210	22.3 y	polonium-211	0.5 s		
bismuth-210	5 d	thallium-207	4.78 m		
polonium-210	138.4 d	lead-207	stable		
lead-206	stable				

<sup>a</sup> By = billion years, y = years, d = days, h = hours, m = minutes, s = seconds

### 4.3 Small Quantities of Radium or NORM in Soil or Other Media: 25 TAC 289.259(d)

NORM waste is exempt for purposes of disposal under 25 TAC 289.259(d) if it contains, or is contaminated at, the following concentrations in soil or other media:

- 30 picocuries per gram (pCi/g) or less of radium-226 or radium-228 provided the radon emanation rate is less than 20 picocuries per square meter per second (pCi/m<sup>2</sup>/sec),
- 5 pCi/g or less of radium-226 or radium-228 in which the radon emanation rate is equal to or greater than 20 pCi/m<sup>2</sup>/sec; or
- 150 pCi/g or less of any other NORM radionuclide.

Radium-226 and radium-228 are considered separately, so both isotopes can be up to the limit (30 or 5 pCi/g) and still be exempt. Typically, Ra-226 is present in larger quantities than Ra-228. *Other media* is defined in 25 TAC 289.259(c)(5) as “any volumetric material other than soils or liquids (for example: sludge, scale, slag, etcetera [sic]).”

Note that the radon-220 emanation rate, formed by the decay of radium-228-contaminated material, would likely be undetectable due to the extremely short half-life of radon-220. The radon-emanation rate specified in the rule above does not apply to:

- known NORM types for which the radon-emanation fraction has been documented to be low, e.g. oil-production scales and sludges;
- soil in which the known volume of NORM would be too low to produce a radon-emanation rate of 20 pCi/m<sup>2</sup>/s (as demonstrated by calculation); or
- soil that has been displaced from its natural location and is to be disposed of in a (permitted) disposal site for hazardous material.

This 30 pCi/g rule [289.259(d)] is not applicable to pipe or other equipment as a means of determining exemption. It is more appropriate for volumetric media, such as sludge, slag, soil, scale, or rubble mixed with other media.

This rule is not to be confused with the “release for unrestricted use” rules at 30 TAC 336.356 (see section 3.5); 25 TAC 289.259(d) applies to soil that has been removed from the site before the site was declared to be released for unrestricted use. These rules are not to be used for determining if soil or other media can be released for unrestricted use.

## 4.4 Source Material: 25 TAC 289.251(d)(1) and (2)

### 4.4.1 Weight Percent of 0.05

For the purpose of exemption concurrences, source material is defined as uranium or thorium, or any combination thereof, in any physical or chemical form [30 TAC 336.2(125)]. Source material does not include special nuclear material (defined in Appendix A). Any chemical mixture, compound, solution, or alloy of source material is exempt if the source material is by weight less 0.05% of the mixture, compound, solution, or alloy [25 TAC 251(d)(1)].

The levels of activity per unit mass that corresponds to 0.05% by weight for different source material radionuclides are shown in Table 3. In the calculations of weight percent, the isotopes Th-228, Th-230, and U-234 can be ignored, since their activity values at 0.05 weight percent exceed the limit of U-238 or Th-232 by over three orders of magnitude and these isotopes, being in equilibrium with Th-232 and U-238, will have activities equal to or less than their parents'. Additionally, U-235 can usually be ignored for uranium that has not been enriched, since it is present in natural ore at only 0.72% by mass, and 2.2% by activity, compared to total uranium.

If radium and other daughters are at or reaching secular equilibrium with the uranium or thorium (each daughter activity should then be equal to or less than the parent activity), then the activity of the daughter is not considered for determining the exemption status of the material. The daughter radionuclides are considered to be covered under the exemption of the uranium or thorium parent. For example, if the material contains 100 pCi/g uranium-238 (under 0.05% by weight) and 90 pCi/g radium-226, it is still exempt even though the radium exceeds 30 pCi/g (see Section 4.1).

Table 3. Specific-Activity Values for 0.05 Weight Percent of Source Material

Isotope	Specific Activity	Material	Specific activity
thorium-232	54.9 pCi/g	natural thorium	110 pCi/g of total Thorium <sup>a</sup>
uranium-238	167.5 pCi/g	natural uranium	340 pCi/g of total Uranium <sup>b</sup>
uranium-235	1,078 pCi/g	depleted uranium	199 pCi/g of total Uranium <sup>c</sup>

<sup>a</sup> Th-232 is in secular equilibrium with its daughter Th-228 (both isotopes are at equal activity level).

<sup>b</sup> By activity, 48.8% U-234 (daughter of U-238), 2.4% U-235, and 48.8% U-238 (IAEA, 2010).

<sup>c</sup> Typically, by activity, 15.2% U-234, 1.1% U-235, and 83.7% U-238 (IAEA, 2010).

### 4.4.2 Unrefined or Unprocessed Ore

Unrefined and unprocessed ore containing source material are exempt provided that the ore has not been refined or processed [25 TAC

289.251(d)(2)]. This exemption does not apply to the mining of ore containing source material for the extraction of source material (known as *source recovery*), which requires a specific license from the TCEQ or the RRC.

#### **4.4.3 Rare-Earth Elements with Source Material**

Rare-earth metals and compounds, mixtures, and products containing no more than 0.25% by weight of thorium, uranium, or any combination of these are exempt [25 TAC 289.251(d)(A)(vi)]. Rare-earth metals include the elements scandium, yttrium, and the 15 lanthanides (also referred to as lanthanoids) with atomic numbers 57–71: lanthanum, cerium, praseodymium, neodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium, and lutetium.

### **4.5 Specific Items Containing Source Material: 25 TAC 289.251(d)(3)**

#### **4.5.1 Thorium**

The following specific items containing thorium are exempt, provided that they meet the weight percentage and other requirements found in the rule.

- incandescent gas mantles: any quantity of Th [25 TAC 251(d)(3)(A)(i)]
- vacuum tubes: any quantity of Th [25 TAC 251(d)(3)(A)(ii)]
- welding rods: any quantity of Th [25 TAC 251(d)(3)(A)(iii)]
- electric lamps used for illuminating: no more than 50 mg Th per lamp [25 TAC 251(d)(3)(A)(iv)]
- germicidal lamps, sunlamps, and lamps for outdoor or industrial lighting: no more than 2 g Th per lamp [25 TAC 251(d)(3)(A)(v)]
- personnel neutron dosimeters: no more than 50 mg Th per dosimeter [25 TAC 251(d)(3)(A)(vi)]
- finished optical lenses (except for contact lenses, spectacles, or in eyepieces in binoculars or in other optical instruments): no more than 30% by weight of Th (does not include the shaping, grinding, or polishing of such lenses or manufacturing processes other than the assembly of such lenses into optical systems and devices without any alteration of the lens) [25 TAC 251(d)(3)(G)]
- finished aircraft-engine parts containing nickel-thoria alloy [25 TAC 251(d)(3)(I)], provided that:

- the thorium is dispersed in the nickel-thoria alloy in the form of finely divided thoria (thorium dioxide) and
- the thorium content in the nickel-thoria alloy does not exceed 4.0% by weight
- any finished product or part containing metal-thorium alloys [25 TAC 289.259(d)(3)(D)], provided that:
  - the thorium content of the alloy does not exceed 4% by weight

The chemical, physical, or metallurgical treatment or processing of these products or parts is not authorized under this rule. However, if parts are machined to ensure they still meet tolerance levels after a period of use, the shavings will be considered exempt for waste-disposal purposes

### **4.5.2 Uranium**

Uranium contained in detector heads for use in fire-detection units are exempt, provided that each detector head contains not more than 0.005 microcuries of uranium [25 TAC 251(d)(3)(H)].

### **4.5.3 Source Material**

The following items containing source material are exempt provided that they meet the weight percentages and other requirements in the rule.

- glazed ceramics (for example tableware): the glaze may not contain more than 20% source material by weight [25 TAC 251(d)(3)(B)(i)]
- glassware (except commercially manufactured glass brick, pane glass, ceramic tile, or other glass or ceramic used in construction): no more than 10% source material by weight [25 TAC 251(d)(3)(B)(ii)]
- glass enamel or glass-enamel frit imported or ordered for importation into the U.S., or initially distributed by manufacturers in the U.S., before July 25, 1983: no more than 10% source material by weight [25 TAC 251(d)(3)(B)(iii)]
- piezoelectric ceramic: no more than 2.0% source material by weight [25 TAC 251(d)(3)(B)(iv)]
- photographic film, negatives, and prints [25 TAC 251(d)(3)(C)]: no weight-percent limit

## **4.6 Depleted Uranium**

Additionally, depleted uranium is exempt if it is used as shielding constituting part of any shipping container, provided that the shipping container is

conspicuously and legibly impressed with the legend "CAUTION—RADIOACTIVE SHIELDING—URANIUM;" and the uranium metal is encased in mild steel or an equally fire-resistant material, with a wall thickness of at least  $\frac{1}{8}$  inch [25 TAC 289.251(d)(3)(F)].

Depleted uranium is exempt if it is contained in counterweights installed (also if stored or handled in connection with the installation or removal of such counterweights) in aircraft, rockets, projectiles, and missiles [25 TAC 289.251(d)(3)(E)]. The rule does not authorize the chemical, physical, or metallurgical treatment or processing of any of these counterweights except for the purpose of repairing or restoring any plating, covering, or labeling. This exemption applies provided that:

- the counterweights are manufactured in accordance with a specific license issued by the NRC authorizing distribution by the licensee in accordance with 10 CFR 40;
- each counterweight has been impressed with the following legend clearly legible through any plating or other covering: "DEPLETED URANIUM" ("CAUTION—RADIOACTIVE MATERIAL—URANIUM" if manufactured prior to December 31, 1969); and
- each counterweight is durably and legibly labeled or marked with the identification of the manufacturer and the statement: "UNAUTHORIZED ALTERATIONS PROHIBITED" ("CAUTION—RADIOACTIVE MATERIAL—URANIUM" if manufactured prior to December 31, 1969).

## 4.7 Other Exempt NORM Items

### 4.7.1 Recycled Contaminated Objects

Materials and equipment in the recycling process contaminated with NORM scale or residue are exempt if the maximum radiation exposure level, including the background radiation level, does not exceed 50 microroentgens per hour ( $\mu\text{R/hr}$ ) at any accessible point [25 TAC 289.259(d)(2)]. Recycling is defined in this context as "a process by which materials that have served their useful purpose are collected, separated, or processed and returned to use in the form of raw materials in the production of new products" [25 TAC 289.259(c)(8)]. Recycling does not include the reuse of an oil pipe after cleaning.

### 4.7.2 Oil and Gas Products and Processing

Pipe (tubulars) and other downhole or surface equipment used in oil production contaminated with NORM scale or residue are exempt if the

maximum radiation exposure level, including the background radiation level, does not exceed 50  $\mu\text{R/hr}$  at any accessible point [25 TAC 289.259(d)(3)]. Unlike other exemption rules that apply to both gas and oil, this rule applies only to oil production.

Natural gas, natural-gas products, crude oil, and crude-oil products containing NORM are exempt [25 TAC 289.259(d)(7)]. However, the processing and manufacturing of natural-gas and crude-oil products containing NORM are subject to general license requirements. Possession of produced waters from crude oil and natural gas production is exempt if the produced waters are reinjected into a well approved by the agency having jurisdiction or if the produced waters are discharged under the authority of the appropriate agency [25 TAC 289.259(d)(8)].

If the waste is under the authority of the Railroad Commission, contact the RRC for the application of this rule to exempt material. Oil-production waste generated outside of Texas falls under the authority of TCEQ if disposed of in Texas.

### ***4.7.3 Phosphate Industry***

The wholesale and retail commercial distribution (including custom blending), possession, and use of the following products and materials, or the recycling of equipment or containers used to produce, contain, or transport them, are exempt [25 TAC 289.259(d)(6)]:

- Phosphate and potash fertilizer. (Note that the manufacture of phosphate and potash fertilizer is subject to general license requirements.)
- Phosphogypsum for agricultural uses, if such commercial distribution and uses meet the requirements of 40 CFR 61.204.

### ***4.7.4 Building, Construction, Industrial Processing, and Other NORM***

Materials used for building construction are exempt if the materials contain NORM that has not been concentrated to higher levels than those found in their natural state. This exemption includes the wholesale and retail commercial distribution, possession, use, and recycling of equipment or containers used to produce, contain, or transport these materials [25 TAC 289.259(d)(6)].

Material used for building construction, industrial processing, sand blasting, metal casings, or other NORM in which the radionuclide content has not been concentrated to higher levels than found in its natural state is exempt. This exemption includes any products or materials and the recycling of equipment

or containers used to produce, contain, or transport those products or materials [25 TAC 289.259(d)(5)].

The following materials commonly contain NORM at relatively high concentrations (but have not been concentrated to higher levels than those found in their natural state and are therefore exempt) and are frequently seen in exemption requests:

- Refractory bricks: NORM is not concentrated during use in a furnace and is therefore exempt under 25 TAC 289.259(d)(5)(C).
- Zirconium oxide (zircon, zirconium): commonly used as a blasting agent. It has a typical total activity of 130 to 145 pCi/g but contains a higher activity of radium (greater than 30 pCi/g) than uranium and thorium. It is exempt under 25 TAC 259(d)(5)(C) as a NORM material used in industrial processing in which radionuclide content has not been concentrated to higher levels than found in its natural state.
- Monazite sand containing thorium-232 and its daughters.
- Alumina, used for ceramic insulators in electrical equipment.

#### ***4.7.5 Potassium and By-Products from Fossil-Fuel Combustion***

The following products and materials and the recycling of equipment or containers used to produce, contain, or transport them, are exempt [25 TAC 289.259(d)(5)]:

- potassium and potassium compounds that have not been isotopically enriched in the radionuclide K-40
- byproducts from fossil-fuel combustion (bottom ash, fly ash, and by-products of flue-gas emission control)

## 5 NON-NORM EXEMPTIONS

### 5.1 Exempt Concentrations of Radionuclides

Rule 25 TAC 289.251(e)(1) exempts materials (solid, liquid, or gaseous) containing radioactive material other than source material which have radionuclide concentrations that do not exceed those listed in 25 TAC §289.251(l)(1), which can be found in Tables B.3 and B.4 in Appendix B.

If a radionuclide decays to a radioactive daughter, the value in those tables for the parent radionuclide includes the daughter activity. The activity of the daughter, as long as it is not greater than the activity of the parent, is not considered in the determination of whether the material is exempt. The sum-of-fractions rule applies if more than one radionuclide is present.

Please note that in most disposal situations, waste form restrictions (such as moisture being below a certain percentage) at landfills and disposal facilities would rule out the disposal of liquid and gaseous wastes, even though values are given for liquid and gaseous concentrations in 25 TAC 289.251(l)(1). These exemption rules were written for use, as well as disposal, of those materials.

This exemption only applies to waste in which radioactive or by-product<sup>2</sup> material was introduced into the waste in accordance to a specific or general license (a specific license **only** for by-product material) of the NRC, an agreement state, or a licensing state.

### 5.2 Exempt Quantities of Radionuclides

Rule 25 TAC 289.251(e)(2) grants exemptions for materials (solid, liquid, or gaseous) containing radioactive material, other than source material, which have individual quantities of radionuclides that do not exceed those listed in 25 TAC 289.251(l)(2), reproduced in Table B.5 in Appendix B. The sum-of-fractions rule applies if more than one radionuclide is present.

Examples of individual quantities for which this rule applies include, but are not limited to, sealed sources and, for liquid waste, the container—such as a tank, truck, or train car—in which the waste is transported into the facility. If the radionuclide is listed in both 25 TAC 289.251(l)(1) and (2), then the concentration limit in 25 TAC 289.251(l)(1) is to be used.

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<sup>2</sup> See Appendix A for definition.

This exemption only applies to waste into which radioactive material has been introduced in accordance with a specific or general license of the NRC, an agreement state, or a licensing state. Additionally, waste in which the radionuclide activity has decayed from quantities not originally exempt does not qualify for this exemption.

Note that in most disposal situations, restrictions on the form of waste (such as moisture being below a certain percentage) of landfills and disposal facilities would rule out the disposal of liquid and gaseous waste even though values are given for liquid and gaseous concentrations in 25 TAC 289.251(l)(1). Those exemption rules were written for use, as well as disposal, of such materials.

### 5.3 Specific Items: 25 TAC 289.251(e)(3)

The following items, which incorporate radioactivity for functional purposes, are exempt if they meet the activity and radiation exposure levels in the rule:

- Timepieces, hands, or dials [25 TAC 289.251(e)(3)(A)(i)(I)] containing not more than—
  - tritium (Hydrogen-3): 25 mCi per timepiece, 5 mCi per hand, 15 mCi per dial (bezels when used shall be considered as part of the dial);
  - radium-226: 1  $\mu$ Ci per timepiece in intact timepieces manufactured prior to January 1, 1986; or
  - promethium-147:
    - 100  $\mu$ Ci per watch or 200  $\mu$ Ci per any other timepiece, 20  $\mu$ Ci per watch hand or 40  $\mu$ Ci per other timepiece hand, 60  $\mu$ Ci per watch dial or 120  $\mu$ Ci per other timepiece dial (bezels when used shall be considered as part of the dial), and
    - The radiation exposure at 10 centimeters when measured through 50 milligrams per square centimeter ( $\text{mg}/\text{cm}^2$ ) of absorber from any surface shall not exceed
      - 0.1 mrad/hr for wristwatches,
      - 0.1 mrad/hr for pocket watches, and
      - 0.2 mrad/hr for any other timepiece.
- Lock illuminators installed in automobile locks containing not more than [25 TAC 289.251(e)(3)(A)(i)(II)]—
  - tritium: 15 mCi or
  - promethium-147:
    - 2 mCi and

- an exposure rate not exceeding 1 mrad/hr at 1 cm from any surface when measured through 50 mg/cm<sup>2</sup> of absorber.
- Precision balances containing not more than 1 mCi of tritium per balance or not more than 0.5 mCi of tritium per balance part [25 TAC 289.251(e)(3)(A)(i)(III)].
- Automobile shift quadrants containing not more than 25 mCi of tritium [25 TAC 289.251(e)(3)(A)(i)(IV)].
- Marine compasses containing not more than 750 mCi of tritium gas and other marine navigational instruments containing not more than 250 mCi of tritium gas [25 TAC 289.251(e)(3)(A)(i)(V)].
- Thermostat dials and pointers containing not more than 25 mCi of tritium per thermostat [25 TAC 289.251(e)(3)(A)(i)(VI)].
- Electron tubes (including spark-gap tubes, power tubes, gas tubes, glow lamps, receiving tubes, microwave tubes, indicator tubes, pick-up tubes, radiation detection tubes, and any other completely sealed tube designed to control electrical currents) [25 TAC 289.251(e)(3)(A)(i)(VII)] provided that—
  - each tube does not contain more than one of the following specified quantities of radioactive material:
    - Tritium: 150 mCi per microwave receiver protector tube or 10 mCi per any other electron tube,
    - Cobalt-60: 1 μCi,
    - Nickel-63: 5 μCi,
    - Krypton-85: 30 μCi,
    - Cesium-137: 5 μCi, or
    - Promethium-147: 30 μCi, and
  - for each tube, the exposure level does not exceed 1 mrad/hr at 1 cm from any surface when measured through 7 mg/cm<sup>2</sup> of absorber.
- Instruments for measuring ionizing radiation containing, for purposes of internal calibration or standardization, a source of radioactive material not exceeding either the applicable quantity set forth in 25 TAC 289.251(l)(2) [see Table B.5] or 0.05 μCi of americium-241 [25 TAC 289.251(e)(3)(A)(i)(VIII)].
- Spark-gap irradiators, each containing no more than 1 μCi of cobalt-60, for use in electrically ignited fuel-oil burners having a firing rate of at least 3 gallons per hour [25 TAC 289.251(e)(3)(A)(i)(IX)].
- Capsules containing 1 μCi or less of carbon-14 urea for *in vivo* diagnostic use in humans [25 TAC 289.251(e)(4)]. (A specific license is required to manufacture, prepare, process, produce, package, repackage, or transfer for commercial distribution such capsules.)

- Self-luminous products containing tritium, krypton-85, or promethium-147 if manufactured, processed, produced, imported, or transferred in accordance with a specific license issued by the NRC authorizing the transfer of the product to persons exempt from regulatory requirements except for [25 TAC 289.251(e)(3)(B)(i)]:
  - those who manufacture, process, or produce these products,
  - products in which self-luminosity serves frivolous purposes, or
  - toys or adornments.
- Ionization-chamber smoke detectors containing no more than 1  $\mu\text{Ci}$  of Am-241 per detector in the form of a foil and designed to protect life and property from fire [25 TAC 289.251(e)(3)(A)(i)(X)].
- Items that contain less than 0.1  $\mu\text{Ci}$  of radium-226 if received, possessed, used, transferred, or owned prior to January 1, 1986 [25 TAC 289.251(e)(3)(B)(ii)].
- Gas and aerosol detectors containing radioactive material designed to protect life or property from fires and airborne hazards are exempt (except for persons who manufacture, process, produce, or initially transfer these detectors) provided that the detectors were manufactured, imported, or transferred in accordance with a specific license issued by the NRC, an agreement state or a licensing state which authorizes the initial transfer of the detectors to persons who are exempt from regulatory requirements [25 TAC 289.251(e)(3)(C)].
  - Detectors must be intact to qualify for this exemption. That is, the cover must not have been removed, nor the source removed from the unit.
  - Required documentation to qualify for this exemption is typically either a sealed-source-and-device (SS&D) sheet or a copy of the radioactive-material license that identifies the make and model of the smoke detector as exempt. The SS&D sheet can be obtained from the manufacturer. If it is unobtainable, the state regulator (Chapter 7 has contact information) has access to additional resources not available to the public that may be able to identify the detector's make and model as exempt. If documentation cannot be found, then that item cannot be exempted under this rule.

## **5.4 Emission-control dust from electric arc furnaces: 25 TAC 289.202(ff)(2)**

This exemption requires approval from either the TCEQ or the DSHS. The DSHS is the appropriate agency if the generator of the material was a DSHS licensee. The TCEQ is the appropriate agency in all other instances.

Emission-control dust and other material from electric-arc furnaces or foundries contaminated as a result of inadvertent melting of cesium-137 or americium-241 sources may be transferred for disposal to a hazardous-waste disposal facility authorized by the TCEQ without regard to its radioactivity if all of the following conditions are met [25 TAC 289.202(ff)(2)]. (“Licensee” includes the owner-operator of an electric arc furnace or foundry or the service contractor hired to handle the waste.)

- The emission-control dust and other incident-related materials (“contaminated materials”), whether packaged or unpackaged (i.e., bulk), must be treated through stabilization to comply with all waste-treatment requirements by the licensee, who must be licensed to possess, treat, or transfer incident-related material contaminated with Cs-137 or Am-241, .
- Transfer and storage (if applicable) and storage of the contaminated materials were in accordance with operating and emergency procedures approved by the appropriate regulatory agency.
- The total Cs-137 or Am-241 activity contained in the contaminated materials to be transferred for disposal was specifically approved by the NRC or all appropriate agreement states and does not exceed the total activity associated with the inadvertent melting incident.
- The operator of the hazardous-waste disposal facility has been notified in writing of the impending transfer and has agreed in writing to receive and dispose of the materials. (Copies of the notification and agreement must be submitted to the appropriate regulatory agency.)
- The licensee has notified the NRC or all agreement states in which the transferor and transferee are located, in writing, of the impending transfer, at least 30 days before the transfer.
- The stabilized contaminated materials had been packaged for transportation and disposal in non-bulk steel packaging as defined in DOT regulations at 49 CFR 173.213.
- The pretreatment average concentrations of Cs-137 in the stabilized contaminated materials do not exceed 130 pCi/g for packaged contaminated materials and 100 pCi/g for unpackaged contaminated materials.
- The pretreatment average concentrations of Am-241 in the stabilized materials do not exceed 3 pCi/g for packaged and unpackaged contaminated materials.
- The dose rate at 3.28 feet (1 meter) from the surface of any package containing the stabilized waste does not exceed 20  $\mu$ rem/hr above background.
- The licensee transferring the contaminated materials must consult with the NRC, the appropriate state and federal agencies, and local governments and obtain all necessary approvals.

- The total incident-related activity received by a disposal facility over its operating life shall not exceed 1 Ci of Cs-137 and 30 mCi of Am-241.

## 6 ALTERNATIVE METHOD FOR OBTAINING AN EXEMPTION CONCURRENCE

Another option for obtaining an exemption concurrence is stipulated at 30 TAC 336.5(a): the TCEQ may exempt a radioactive material if it determines that the exemption is not prohibited by law and will not result in a significant risk to public health and safety or the environment. Persons requesting an exemption under this rule need to submit an application to TCEQ using the process in 30 TAC 90 (relating to regulatory flexibility).

The application must be accompanied by certain fees and must include:

- the nature of the request,
- a legal analysis to demonstrate that the exemption is not prohibited by law,
- a technical analysis to demonstrate that the exemption will not result in a significant risk to public health and safety or the environment, and
- a detailed explanation, including a demonstration as appropriate, that the proposed exemption is:
  - not prohibited by law, including any requirement for a federally approved or authorized program, and
  - at least as protective of the environment and the public health as the method or standard prescribed by the TCEQ rule that would otherwise apply.

## 7 OBTAINING AN EXEMPTION CONCURRENCE

To request an exemption concurrence, send a signed letter with the appropriate documentation to the Radioactive Materials Division, MC 233, TCEQ, P.O. Box 13087, Austin TX 78711-3087. Please mark on the envelope that an exemption is being requested. The request can also be scanned and electronically submitted to the Radioactive Materials Division. However, if the request is over 50 pages, a hard copy must be mailed as well. To determine the point of contact for exemptions, call the Radioactive Materials Division at 512-239-6466.

Often, a hazardous-waste disposal facility will request an exemption concurrence for the waste generator as part of its process of receiving and disposing of waste that contains radioactive material.

Please include the following information in the exemption-concurrence request:

- the waste-generator identification
- the volume of waste
- the physical form of the waste
- a sampling protocol and sampling data
- characterization
- the device manufacturer's name and device model number (if appropriate)
- any other information that may help in making the exemption determination

The TCEQ typically needs up to two weeks to review an exemption request. If the agency requires additional information, its staff will contact the requester by letter, e-mail, or phone. There is no fee for an exemption-concurrence request (or for the actual concurrence) unless the exemption is processed according to 30 TAC 336.5(a) (see Chapter 6).

An exemption concurrence can only be granted to a material or item if documentation shows that it meets the exemption criteria. Documentation can be one or more of the following: process knowledge, radiochemical analysis of the sample, radiation surveys of the item or material, or NRC analysis documenting that it meets the exemption criteria, provided that the criteria are also in the Texas Administrative Code.

## 7.1 Process Knowledge

Many items identified in the exemption rules have been manufactured with specific radioactive content so that those items would satisfy the exemption limits. Such items can be exempted without radiochemical analysis if it can be documented that they were manufactured to contain a radioactive content at or below the exemption limits. Some examples of such items or documentation include:

- a smoke detector which has a sticker attached verifying that it contains 1  $\mu\text{Ci}$  or less of americium-241
- a sealed-source-or-device sheet from the NRC exempting this specific sealed source, identified by manufacturer and model number
- NRC license showing the make and model of a device or sealed source as being authorized to be commercially distributed as an exempt item
- company literature
- a Material Data Safety Sheet
- items used by the U.S. armed forces that are built according to military specifications and listed by a national part number in the Technical Bulletin (Army, 1998) as exempt.

The list above is not an exhaustive discussion of the different possibilities for using process knowledge but only gives examples from prior exemption-concurrence requests.

Clearly defined manufacturing processes that use NORM material can be exempted using process knowledge [under 25 TAC 289.259(d)(5)(A), (5)(C), and (6)(C)] if it can be documented that the process does not concentrate the naturally occurring radionuclides according to the appropriate regulation.

## 7.2 Radiochemical Analysis

If process knowledge cannot demonstrate whether an item or material is exempt, then the TCEQ may require sampling to ascertain whether the waste meets the exemption criteria.

### ***7.2.1 NELAC Accreditation***

Analytical data from samples measured by a laboratory can only be accepted if the laboratory is National Environmental Laboratory Accreditation Conference (NELAC) accredited by the Texas Laboratory Accreditation Program operated

by the TCEQ<sup>3</sup> or the data are exempt from the NELAC-accreditation requirement under one of the following criteria [30 TAC 25.6]:

- The laboratory is an on-site or in-house environmental testing laboratory that
  - is inspected at least every three years by the executive director,
  - is located in another state and accredited or periodically inspected by that state, or
  - gets inspected at least every three years by the executive director and is performing work:
    - for another company with a unit located on the same site, or
    - without compensation for a governmental agency or a charitable organization.
- The lab is accredited under federal law, including certification by the United States Environmental Protection Agency to provide analytical data for decisions relating to compliance with the Safe Drinking Water Act.
- The lab supplies analytical data necessary for emergency response and the required analytical data are not otherwise available from an environmental testing laboratory that is accredited by the TCEQ or federal law.
- The lab supplies analytical data for which the commission does not offer accreditation.

## **7.2.2 Minimum Detectable Activity and Detection Limit**

The *minimum detectable activity* (MDA) is the smallest activity above the background level of a radionuclide that will be detected with a 95% probability (a 5% probability of a *false negative*) and a 5% probability of falsely concluding that a sample at background is above the background activity value (*false positive*). The MDA is the minimum radionuclide activity that an instrument can reliably detect.

The *detection limit* (DL) is the smallest activity that will be detected with a 5% false positive probability but with a false negative probability higher than 5%. The DL is also known as the *lower level of detection*. If the analytical result is above the DL, even if the value is below the MDA, it can be concluded that the radionuclide is present above background in that sample. The DL is the minimum activity that an instrument can detect.

It is a common error to assume that measurements below the MDA indicate that the sample does not contain that radionuclide or that the radionuclide is at background levels. Reported values below the MDA should be reported as

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<sup>3</sup> A list of which laboratories are accredited by the TCEQ appears at <[www.tceq.state.tx.us/assets/public/compliance/compliance\\_support/qa/txnelap\\_lab\\_list.pdf](http://www.tceq.state.tx.us/assets/public/compliance/compliance_support/qa/txnelap_lab_list.pdf)>.

measured, even if negative, and not be listed only as being below the MDA. Since values above the DL indicate the presence of the radionuclide, the MDA should not be used as the detection cutoff point.

The MDA and DL depends upon the type of instrument, the counting geometry (position and size of the radiation source in relation to the detector), the measurement methodology, and the radionuclide to be detected. The DL must be below the exemption limits or the values cannot be used to confirm that the exemption requirements have been met.

Equations 1 and 2 determine the MDA and LLD, respectively. The square root of the background activity is also the standard deviation of the background count.

$$\text{Eqn. 1} \quad LLD = 2.33\sqrt{B}$$

$$\text{Eqn. 2} \quad MDA = 3 + 4.66\sqrt{B}$$

$B$  is the measured background activity.

### 7.2.3 Averaging and Homogeneity

It is important that the sample accurately represent the average activity level of the waste volume. If homogeneity cannot be guaranteed, then four to five samples are required for every 20 cubic yards (yd<sup>3</sup>). The maximum volume of material over which averaging may be performed is 20 yd<sup>3</sup>. No single measurement made to calculate an average volumetric or surface-activity contamination can exceed 10 times the exemption criteria.

A total of fewer than four to five samples per 20 yd<sup>3</sup> will be accepted if additional data are included such as the studies of contaminated soil from an environmental remediation project which had been sampled extensively during the characterization or remediation stage. Examples of acceptable data successfully used in prior exemption-concurrence requests, combined with analytical laboratory analysis of samples, include the results of an *in situ* object-counting system (ISOCS) and screening surveys of soil or debris with the intent of on-site segregation into waste types.

Each waste container is considered as a separate waste volume. Two waste volumes cannot be averaged together to determine if the activity is below the exemption limit. For example, two containers, one at 34 pCi/g Ra-226 and the other at 20 pCi/g Ra-226 cannot be averaged to yield a result of 27 pCi/g Ra-226 and thereby exempt both containers. Only the container at 20 pCi/g Ra-226 would be exempt.

## 7.2.4 Measurement of Daughters to Determine Parent Radionuclide Activity

Some radiochemical analyses are difficult to perform, given the isotope and the material. These analyses may require alternative testing methodologies. For example, analysis of thorium in metal is a difficult measurement to perform since iron in the sample interferes with measuring the thorium. However, the daughters of the parent nuclide (uranium or thorium) may be measured to determine the parent radionuclide concentration. In addition, whether equilibrium has been reached (daughter activity equals parent activity) or the ratio of daughter activity to parent activity (if equilibrium has not yet been reached) can be calculated from the elapsed time since the item was processed or manufactured and the half-life values of the applicable isotopes.

## 7.2.5 Surface Contaminated Waste

Volumetric measurements of surface-contaminated waste (averaging the activity on the surface over the mass of the piece of debris)—such as fixed contamination on concrete rubble—for disposal exemption concurrences are allowed, case by case, if the procedures in ANSI/HPS N13.12-1999 are closely followed. Contaminated distinct items or equipment, if they are to be disposed of, do not need to meet the surface-contamination release limits in 30 TAC 336.364 (see Table 1). The TCEQ will not accept a calculation that averages the activity on the surface of a piece of debris and the entire mass of material in a container containing non-contaminated rubble or other waste. *Radiological Assessments for Clearance of Materials from Nuclear Facilities* (NRC, 2003: section 3.8) contains a methodology relating specific activities (Bq/cm<sup>2</sup>) to specific areal activity (Bq/g), including the mass-to-surface-ratio conversion factors for various steel components of nuclear power plants.

## 7.3 Radiation Survey

Radiation surveys (wipes or exposure rates) are sometimes required to determine if exemption requirements are met. Rules regarding the radiation-survey instruments are at 25 TAC 289.259(e), which is summarized below.

- The radiation-survey instrument must be:
  - able to measure from 1  $\mu\text{R/hr}$  to at least 500  $\mu\text{R/hr}$ ,
  - calibrated,
  - appropriate (for example, a detector able to measure alpha radiation shall be used for alpha-emitting radionuclides), and
  - operable.
- Calibration of the radiation-survey instrument must:

- be performed by a person licensed or registered by the DSHS, another agreement state or licensing state, or the NRC to perform such service;
  - be for the same energy values as the radiation to be measured;
  - be performed annually and also after each time that the instrument is serviced (changing the battery does not require that the instrument be calibrated); and
  - demonstrate an accuracy within  $\pm 20\%$  using a reference source supplied by a person properly authorized.
- Records of instrument calibrations are to be maintained for inspection by the NRC, DSHS, or an appropriate agreement-state agency for five years after the calibration date.

## 7.4 NRC Analysis

A letter from the NRC documenting its analysis and conclusion that a specific waste volume or stream meets the exemption requirements may be accepted by TCEQ to grant an exemption concurrence in Texas, provided that the rule in the Code of Federal Regulations used by the NRC to exempt the material is also in the Texas Administrative Code (see Subsection 2.3.1).

## 8 REFERENCES

- American National Standards Institute–Health Physics Society. 1999. *Surface and Volume Radioactivity Standards for Clearance*. ANSI/HPS N13.12-1999. McLean, VA: Health Physics Society.
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- NRC. 1974. *Termination of Operating Licenses for Nuclear Reactors*. Regulatory Guide 1.86. Washington.
- . 2001. *Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials*. NUREG-1717. Washington.
- . 2003. *Radiological Assessments for Clearance of Materials from Nuclear Facilities*. NUREG-1640. Washington.

## APPENDIX A: DEFINITIONS

**agreement state.** Any state with which the NRC has entered into an effective agreement under 274b of the Atomic Energy Act of 1954, as amended. An agreement state regulates radioactive material within its boundaries except for federal sites and nuclear power plants.

**by-product material.** Defined in 30 TAC 336.2(16) in regards to source material as “the tailings or wastes produced by or resulting from the extraction or concentration of uranium or thorium from ore processed primarily for its source material content, including discrete surface wastes resulting from uranium solution extraction processes, and other tailings having similar radiological characteristics.” It excludes underground ore bodies depleted by these solution-extraction processes.

**executive director.** The executive director of the commission, or any authorized individual designated to act for the executive director [30 TAC 3.2(16)].

**exempt material.** Radioactive material that is exempt from the radioactive-material regulations and can therefore be used or disposed of without consideration of its radioactive content.

**exemption concurrence.** A letter from the appropriate regulatory agency stating that a specific radioactive material or object meets the exemption criteria stipulated in the Texas Administrative Code and is therefore exempt from the radioactive material regulations.

**false negative.** Failure of an analysis of a sample for a radionuclide contaminant to detect that radionuclide when the sample actually is contaminated with it.

**false positive.** Seeming detection of a radionuclide contaminant in a sample when the sample actually is not contaminated with that radionuclide.

**licensed material.** Radioactive material received, possessed, used, or transferred under a general or specific license issued by the agency [25 TAC 289.201(b)(53)].

**naturally occurring radioactive material.** Defined in 25 TAC 289.259(c)(4) as:

Naturally occurring materials not regulated under the A[tomic] E[nergy] A[ct] whose radionuclide concentrations have been increased by or as a result of human practices. NORM does not include the natural radioactivity of rocks or soils, or background radiation, but instead refers to materials whose radioactivity is

concentrated by controllable practices (or by past human practices). NORM does not include source, byproduct, or special nuclear material.

**special nuclear material.** Either (A) plutonium, uranium-233, uranium enriched in the isotope 233 or in the isotope 235, and any other material that NRC, in accordance with the provisions of the Atomic Energy Act of 1954, 51 as amended, determines to be special nuclear material, but does not include source material; or (B) any material artificially enriched by any of the foregoing, but not source material [25 TAC 289.201(b)(101)].

**sum-of-fractions rule.** Equation used to determine if a mixture of radionuclides exceeds a regulatory limit when each radionuclide has a different activity limit. The rule is shown in Equation A-1, but can be described as the requirement that the sum of the ratios of the radionuclide concentrations over its regulatory limit is less than or equal to one.

Eqn. A-1 
$$Ratio = \sum_{i=1}^N \frac{C_i}{R_i} \leq 1.0$$

$C$  is the measured concentration or activity of radioisotope  $i$ .

$R$  is the regulatory limit for the concentration or activity of radioisotope  $i$ .

$N$  is the total number of radioisotopes in the waste.

**transuranics (TRUs).** Elements with an atomic number higher than that of uranium, which is 92. Common transuranic elements are neptunium, plutonium, americium, and curium.

**tritium.** A hydrogen isotope with one proton and two neutrons. It is commonly referred as tritium (T) instead of hydrogen-3 (H-3).

# APPENDIX B: REGULATORY TABLES USED TO DETERMINE IF A MATERIAL IS EXEMPT

**Table B.1. Monthly Average Radionuclide Concentrations Allowed for Release to Sewers as Authorized at 25 TAC 336.215**

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
Hydrogen (H)	1	H-3	1E-2				
Beryllium (Be)	4	Be-7	6E-3	Be-10	2E-4		
Carbon (C)	6	C-11	6E-2	C14	3E-4		
Fluorine (F)	9	F-18	7E-3				
Sodium (Na)	11	Na-22	6E-5	Na-24	5E-4		
Magnesium (Mg)	12	Mg-28	9E-5				
Aluminum (Al)	13	Al-26	6E-5				
Silicon (Si)	14	Si-31	1E-3	Si-32	4E-4		
Phosphorus (P)	15	P-32	9E-5	P-33	8E-4		
Sulfur (S)	16	S-35	1E-3				
Chlorine (Cl)	17	Cl-36	2E-4	Cl-38	3E-3	Cl-39	5E-3
Potassium (K)	19	K-40	4E-5	K-42	6E-4	K-43	9E-4
		K-44	5E-3	K-45	7E-3		
Calcium (Ca)	20	Ca-41	6E-4	Ca-45	2E-4	Ca-47	1E-4
Scandium (Sc)	21	Sc-43	1E-3	Sc-44m	7E-5	Sc-44	5E-4
		Sc-46	1E-4	Sc-47	4E-4	Sc-48	1E-4
		Sc-49	3E-3				
Titanium (Ti)	22	Ti-44	4E-5	Ti-45	1E-3		
Vanadium (V)	23	V-47	4E-3	V-48	9E-5	V-49	1E-2
Chromium (Cr)	24	Cr-48	8E-4	Cr-49	4E-3	Cr-51	5E-3
Manganese (Mn)	25	Mn-51	3E-3	Mn-52m	5E-3	Mn-52	1E-4
		Mn-53	7E-3	Mn-54	3E-4	Mn-56	7E-4
Iron (Fe)	26	Fe-52	1E-4	Fe-55	1E-3	Fe-59	1E-4
		Fe-60	4E-6				
Cobalt (Co)	27	Co-55	2E-4	Co-56	6E-5	Co-57	6E-4
		Co-58m	8E-3	Co-58	2E-4	Co-60m	2E-1
		Co-60	3E-5	Co-61	3E-3	Co-62m	7E-3
Nickel (Ni)	28	Ni-56	2E-4	Ni-57	2E-4	Ni-59	3E-3
		Ni-63	1E-3	Ni-65	1E-3	Ni-66	6E-5
Copper (Cu)	29	Cu-60	4E-3	Cu-61	2E-3	Cu-64	2E-3
		Cu-67	6E-4				
Zinc (Zn)	30	Zn-62	2E-4	Zn-63	3E-3	Zn-65	5E-5
		Zn-69m	6E-4	Zn-69	8E-3	Zn-71m	8E-4
		Zn-72	1E-4				
Gallium (Ga)	31	Ga-65	9E-3	Ga-66	1E-4	Ga-67	1E-3
		Ga-68	2E-3	Ga-70	1E-2	Ga-72	2E-4
		Ga-73	7E-4				
Germanium (Ge)	32	Ge-66	3E-3	Ge-67	6E-3	Ge-68	6E-4
		Ge-69	2E-3	Ge-71	7E-2	Ge-75	9E-3
		Ge-77	1E-3	Ge-78	3E-3		
Arsenic (As)	33	As-69	6E-3	As-70	2E-3	As-71	5E-4
		As-72	1E-4	As-73	1E-3	As-74	2E-4
		As-76	1E-4	As-77	6E-4	As-78	1E-3
Selenium (Se)	34	Se-70	1E-3	Se-73m	4E-3	Se-73	4E-4
		Se-75	7E-5	Se-79	8E-5	Se-81m	3E-3

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
Bromine (Br)	35	Se-81	1E-2	Se-83	4E-3		
		Br-74m	3E-3	Br-74	5E-3	Br-75	5E-3
		Br-76	5E-4	Br-77	2E-3	Br-80m	3E-3
		Br-80	1E-2	Br-82	4E-4	Br-83	9E-3
Rubidium (Rb)	37	Br-84	4E-3				
		Rb-79	8E-3	Rb-81m	4E-2	Rb-81	5E-3
		Rb-82m	2E-3	Rb-83	9E-5	Rb-84	7E-5
		Rb-86	7E-5	Rb-87	1E-4	Rb-88	4E-3
Strontium (Sr)	38	Rb-89	9E-3				
		Sr-80	6E-4	Sr-81	3E-3	Sr-82	3E-5
		Sr-83	3E-4	Sr-85m	3E-2	Sr-85	4E-4
		Sr-87m	6E-3	Sr-89	8E-5	Sr-90	5E-6
Yttrium (Y)	39	Sr-91	2E-4	Sr-92	4E-4		
		Y-86m	3E-3	Y-86	2E-4	Y-87	3E-4
		Y-88	1E-4	Y-90m	1E-3	Y-90	7E-5
		Y-91m	2E-2	Y-91	8E-5	Y-92	4E-4
Zirconium (Zr)	40	Y-93	2E-4	Y-94	4E-3	Y-95	7E-3
		Zr-86	2E-4	Zr-88	5E-4	Zr-89	2E-4
		Zr-93	4E-4	Zr-95	2E-4	Zr-97	9E-5
Niobium (Nb)	41	Nb-88	1E-2	Nb-89	1E-3	Nb-89	7E-4
				(22 min)		(122 min)	
		Nb-90	1E-4	Nb-93m	2E-3	Nb-94	1E-4
		Nb-95m	3E-4	Nb-95	3E-4	Nb-96	2E-4
Molybdenum (Mo)	42	Nb-97	3E-3	Nb-98	2E-3		
		Mo-90	3E-4	Mo-93m	6E-4	Mo-93	5E-4
		Mo-99	2E-4	Mo-101	7E-3		
Technetium (Tc)	43	Tc-93m	1E-2	Tc-93	4E-3	Tc-94m	3E-3
		Tc-94	1E-3	Tc-95m	5E-4	Tc-95	1E-3
		Tc-96m	2E-2	Tc-96	3E-4	Tc-97m	6E-4
		Tc-97	5E-3	Tc-98	1E-4	Tc-99m	1E-2
		Tc-99	6E-4	Tc-101	2E-2	Tc-104	4E-3
Ruthenium (Ru)	44	Ru-94	2E-3	Ru-97	1E-3	Ru-103	3E-4
		Ru-105	7E-4	Ru-106	3E-5		
Rhodium (Rh)	45	Rh-99m	2E-3	Rh-99	3E-4	Rh-100	2E-4
		Rh-101m	8E-4	Rh-101	3E-4	Rh-102m	2E-4
		Rh-102	8E-5	Rh-103m	6E-2	Rh-105	5E-4
		Rh-106m	1E-3	Rh-107	1E-2		
Palladium (Pd)	46	Pd-100	2E-4	Pd-101	2E-3	Pd-103	1E-3
		Pd-107	5E-3	Pd-109	3E-4		
Silver (Ag)	47	Ag-102	9E-3	Ag-103	5E-3	Ag-104m	4E-3
		Ag-104	3E-3	Ag-105	4E-4	Ag-106m	1E-4
		Ag-106	9E-3	Ag-108m	9E-5	Ag-110m	6E-5
		Ag-111	2E-4	Ag-112	4E-4	Ag-115	4E-3
Cadmium (Cd)	48	Cd-104	3E-3	Cd-107	3E-3	Cd-109	6E-5
		Cd-113m	5E-6	Cd-113	4E-6	Cd-115m	4E-5
		Cd-115	1E-4	Cd-117m	6E-4	Cd-117	6E-4
Indium (In)	49	In-109	3E-3	In-110	2E-3	In-110	7E-4
				(69.1 min)		(4.9 hr)	
		In-111	6E-4	In-112	2E-2	In-113m	7E-3
		In-114m	5E-5	In-115m	2E-3	In-115	5E-6
		In-116m	3E-3	In-117m	2E-3	In-117	8E-3
Tin (Sn)	50	In-119m	7E-3				
		Sn-110	5E-4	Sn-111	1E-2	Sn-113	3E-4
		Sn-117m	3E-4	Sn-119m	6E-4	Sn-121m	5E-4
		Sn-121	8E-4	Sn-123m	7E-3	Sn-123	9E-5

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
Antimony (Sb)	51	Sn-125	6E-5	Sn-126	4E-5	Sn-127	9E-4
		Sn-128	1E-3				
		Sb-115	1E-2	Sb-116m	3E-3	Sb-116	1E-2
		Sb-117	9E-3	Sb-118m	7E-4	Sb-119	2E-3
		Sb-120	2E-2	Sb-120	1E-4	Sb-122	1E-4
				(5.8d)			
		Sb-124m	3E-2	Sb-124	7E-5	Sb-125	3E-4
		Sb-126m	9E-3	Sb-126	7E-5	Sb-127	1E-4
		Sb-128	1E-2	Sb-128	2E-4	Sb-129	4E-4
		(10 min)		(9.01 hr)			
Tellurium (Te)	52	Sb-130	3E-3	Sb-131	2E-3		
		Te-116	1E-3	Te-121m	1E-4	Te-121	4E-4
		Te-123m	1E-4	Te-123	2E-4	Te-125m	2E-4
		Te-127m	9E-5	Te-127	1E-3	Te-129m	7E-5
		Te-129	4E-3	Te-131m	8E-5	Te-131	8E-4
		Te-132	9E-5	Te-133m	9E-4	Te-133	4E-3
		Te-134	3E-3				
Iodine (I)	53	I-120m	2E-3	I-120	1E-3	I-121	4E-3
		I-123	1E-3	I-124	2E-5	I-125	2E-5
		I-126	1E-5	I-128	8E-3	I-129	2E-6
		I-130	2E-4	I-131	1E-5	I-132m	1E-3
		I-132	1E-3	I-133	7E-5	I-134	4E-3
		I-135	3E-4				
Cesium (Cs)	55	Cs-125	1E-2	Cs-127	9E-3	Cs-129	3E-3
		Cs-130	1E-2	Cs-131	3E-3	Cs-132	4E-4
		Cs-134m	2E-2	Cs-134	9E-6	Cs-135m	1E-2
		Cs-135	1E-4	Cs-136	6E-5	Cs-137	1E-5
		Cs-138	4E-3				
Barium (Ba)	56	Ba-126	8E-4	Ba-128	7E-5	Ba-131m	7E-2
		Ba-131	4E-4	Ba-133m	4E-4	Ba-133	2E-4
		Ba-135m	4E-4	Ba-139	2E-3	Ba-140	8E-5
		Ba-141	3E-3	Ba-142	7E-3		
Lanthanum (La)	57	La-131	6E-3	La-132	4E-4	La-135	5E-3
		La-137	2E-3	La-138	1E-4	La-140	9E-5
		La-141	5E-4	La-142	1E-3	La-143	5E-3
Cerium (Ce)	58	Ce-134	8E-5	Ce-135	2E-4	Ce-137m	3E-4
		Ce-137	7E-3	Ce-139	7E-4	Ce-141	3E-4
		Ce-143	2E-4	Ce-144	3E-5		
Praseodymium (Pr)	59	Pr-136	1E-2	Pr-137	5E-3	Pr-138m	1E-3
		Pr-139	6E-3	Pr-142m	1E-2	Pr-142	1E-4
		Pr-143	2E-4	Pr-144	6E-3	Pr-145	4E-4
		Pr-147	1E-2				
Neodymium (Nd)	60	Nd-136	2E-3	Nd-138	3E-4	Nd-139m	7E-4
		Nd-139	1E-2	Nd-141	2E-2	Nd-147	2E-4
		Nd-149	1E-3	Nd-151	9E-3		
Promethium (Pm)	61	Pm-141	8E-3	Pm-143	7E-4	Pm-144	2E-4
		Pm-145	1E-3	Pm-146	2E-4	Pm-147	7E-4
		Pm-148m	1E-4	Pm-148	7E-5	Pm-149	2E-4
		Pm-150	7E-4	Pm-151	2E-4		
Samarium (Sm)	62	Sm-141m	4E-3	Sm-141	8E-3	Sm-142	1E-3
		Sm-145	8E-4	Sm-146	3E-6	Sm-147	4E-6
		Sm-151	2E-3	Sm-153	3E-4	Sm-1552	1E-2
		Sm-156	7E-4				
Europium (Eu)	63	Eu-145	2E-4	Eu-146	1E-4	Eu-147	4E-4
		Eu-148	1E-4	Eu-149	2E-3	Eu-150	4E-4

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
						(12.6 h)	
		Eu-150	1E-4	Eu-152m	4E-4	Eu-152	1E-4
		(34.2 y)					
		Eu-154	7E-5	Eu-155	5E-4	Eu-156	8E-5
		Eu-157	3E-4	Eu-158	3E-3		
Gadolinium (Gd)	64	Gd-145	6E-3	Gd-146	2E-4	Gd-147	3E-4
		Gd-148	3E-6	Gd-149	4E-4	Gd-151	9E-4
		Gd-152	4E-6	Gd-153	6E-4	Gd-159	4E-4
Terbium (Tb)	65	Tb-147	1E-3	Tb-149	7E-4	Tb-150	7E-4
		Tb-151	5E-4	Tb-153	7E-4	Tb-154	2E-4
		Tb-155	8E-4	Tb-156m	2E-3	Tb-156m	1E-3
				(5.0 hr)		(24.4 hr)	
		Tb-156	1E-4	Tb-157	7E-3	Tb-158	2E-4
		Tb-160	1E-4	Tb-161	3E-4		
Dysprosium (Dy)	66	Dy-155	1E-3	Dy-157	3E-3	Dy-159	2E-3
		Dy-165	2E-3	Dy-166	1E-4		
Holmium (Ho)	67	Ho-155	6E-3	Ho-157	4E-2	Ho-159	3E-2
		Ho-161	1E-2	Ho-162m	7E-3	Ho-162	1E-1
		Ho-164m	1E-2	Ho-164	3E-2	Ho-166m	9E-5
		Ho-166	1E-4	Ho-167	2E-3		
Erbium (Er)	68	Er-161	2E-3	Er-165	9E-3	Er-169	5E-4
		Er-171	5E-4	Er-172	2E-4		
Thulium (Tm)	69	Tm-162	1E-2	Tm-166	6E-4	Tm-167	3E-4
		Tm-170	1E-4	Tm-171	2E-3	Tm-172	1E-4
		Tm-173	6E-4	Tm-175	1E-2		
Ytterbium (Yb)	70	Yb-162	1E-2	Yb-166	2E-4	Yb-167	4E-2
		Yb-169	2E-4	Yb-175	4E-4	Yb-177	2E-3
		Yb-178	2E-3				
Lutetium (Lu)	71	Lu-169	3E-4	Lu-170	2E-4	Lu-171	3E-4
		Lu-172	1E-4	Lu-173	7E-4	Lu-174m	4E-4
		Lu-174	7E-4	Lu-176m	1E-3	Lu-176	1E-4
		Lu-177m	1E-4	Lu-177	4E-4	Lu-178m	8E-3
		Lu-178	6E-3	Lu-179	9E-4		
Hafnium (Hf)	72	Hf-170	4E-4	Hf-172	2E-4	Hf-173	7E-4
		Hf-175	4E-4	Hf-177m	3E-3	Hf-178m	3E-5
		Hf-179m	1E-4	Hf-180m	1E-3	Hf-181	2E-4
		Hf-182m	5E-3	Hf-182	5E-5	Hf-183	3E-3
		Hf-184	3E-4				
Tantalum (Ta)	73	Ta-172	5E-3	Ta-173	9E-4	Ta-174	4E-3
		Ta-175	8E-4	Ta-176	5E-4	Ta-177	2E-3
		Ta-178	2E-3	Ta-179	3E-3	Ta-180m	3E-3
		Ta-180	2E-4	Ta-182m	3E-2	Ta-182	1E-4
		Ta-183	2E-4	Ta-184	3E-4	Ta-185	4E-3
		Ta-186	1E-2				
Tungsten (W)	74	W-176	1E-3	W-177	3E-3	W-178	7E-4
		W-179	7E-2	W-181	2E-3	W-185	4E-4
		W-187	3E-4	W-188	7E-5		
Rhenium (Re)	75	Re-177	2E-2	Re-178	1E-2	Re-181	7E-4
		Re-182	9E-4	Re-182	2E-4	Re-184m	3E-4
		(12.7 hr)		(64.0 hr)			
		Re-184	3E-4	Re-186m	2E-4	Re-186	3E-4
		Re-187	8E-2	Re-188m	1E-2	Re-188	2E-4
		Re-189	4E-4				
Osmium (Os)	76	Os-180	1E-2	Os-181	2E-3	Os-182	3E-4
		Os-185	3E-4	Os-189m	1E-2	Os-191m	2E-3

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )						
Iridium (Ir)	77	Os-191	3E-4	Os-193	2E-4	Os-194	8E-5	
		Ir-182	6E-3	Ir-184	1E-3	Ir-185	7E-4	
		Ir-186	3E-4	Ir-187	1E-3	Ir-188	3E-4	
		Ir-189	7E-4	Ir-190m	2E-2	Ir-190	1E-4	
		Ir-192m	4E-4	Ir-192	1E-4	Ir-194m	9E-5	
Platinum (Pt)	78	Ir-194	1E-4	Ir-195m	1E-3	Ir-195	2E-3	
		Pt-186	2E-3	Pt-188	2E-4	Pt-189	1E-3	
		Pt-191	5E-4	Pt-193m	4E-4	Pt-193	6E-3	
		Pt-195m	3E-4	Pt-197m	2E-3	Pt-197	4E-4	
Gold (Au)	79	Pt-199	7E-3	Pt-200	2E-4			
		Au-193	1E-3	Au-194	4E-4	Au-195	7E-4	
		Au-198m	1E-4	Au-198	2E-4	Au-199	4E-4	
Mercury (Hg) organic	80	Au-200m	2E-4	Au-200	4E-3	Au-201	1E-2	
		Hg-193m	6E-4	Hg-193	3E-3	Hg-194	2E-6	
		Hg-195m	4E-4	Hg-195	2E-3	Hg-197m	5E-4	
Mercury (Hg) sulfate	80	Hg-197	9E-4	Hg-199m	1E-2	Hg-203	7E-5	
		Hg-193m	4E-4	Hg-193	2E-3	Hg-195	1E-4	
		Hg-195m	3E-4	Hg-195	2E-3	Hg-197m	4E-4	
Thallium (Tl)	81	Hg-197	8E-4	Hg-199m	8E-3	Hg-203	3E-4	
		Tl-194m	1E-2	Tl-194	4E-2	Tl-195	9E-3	
		Tl-197	1E-2	Tl-198m	4E-3	Tl-198	3E-3	
		Tl-199	9E-3	Tl-200	1E-3	Tl-201	2E-3	
Lead (Pb)	82	Tl-202	5E-4	Tl-204	2E-4			
		Pb-195m	8E-3	Pb-198	4E-3	Pb-199	3E-3	
		Pb-200	4E-4	Pb-201	1E-3	Pb-202m	1E-3	
		Pb-202	2E-5	Pb-203	7E-4	Pb-205	5E-4	
		Pb-209	3E-3	Pb-210	1E-7	Pb-211	2E-3	
Bismuth (Bi)	83	Pb-212	2E-5	Pb-214	1E-3			
		Bi-200	4E-3	Bi-201	2E-3	Bi-202	2E-3	
		Bi-203	3E-4	Bi-205	2E-4	Bi-206	9E-5	
		Bi-207	1E-4	Bi-210m	8E-6	Bi-210	1E-4	
Polonium (Po)	84	Bi-212	7E-4	Bi-213	1E-3	Bi-214	3E-3	
		Po-203	3E-3	Po-205	3E-3	Po-207	1E-3	
Astatine (At)	85	Po-210	4E-7					
Francium (Fr)	87	At-207	8E-4	At-211	2E-5			
Radium (Ra)	88	Fr-222	3E-4	Fr-223	8E-5			
		Ra-223	1E-6	Ra-224	2E-6	Ra-225	2E-6	
Actinium (Ac)	89	Ra-226	6E-7	Ra-227	3E-3	Ra-228	6E-7	
		Ac-224	3E-4	Ac-225	7E-6	Ac-226	2E-5	
Thorium (Th)	90	Ac-227	5E-8	Ac-228	3E-4			
		Th-226	7E-4	Th-227	2E-5	Th-228	2E-6	
		Th-229	2E-7	Th-230	1E-6	Th-231	5E-4	
Protactinium (Pa)	91	Th-232	3E-7	Th-234	5E-5			
		Pa-227	5E-4	Pa-228	2E-4	Pa-230	1E-4	
		Pa-231	6E-8	Pa-232	2E-4	Pa-233	2E-4	
Uranium (U)	92	Pa-234	3E-4					
		U-230	8E-7	U-231	6E-4	U-232	6E-7	
		U-233	3E-6	U-234	3E-6	U-235	3E-6	
		U-236	3E-6	U-237	3E-4	U-238	3E-6	
Neptunium (Np)	93	U-239	9E-3	U-240	2E-4	U-natural	3E-6	
		Np-232	2E-2	Np-233	1E-1	Np-234	3E-4	
		Np-235	3E-3	Np-236	9E-7	Np-236	5E-4	
				(1.2E5 yr)		(22.5 hr)		
		Np-237	2E-7	Np-238	2E-4	Np-239	2E-4	
		Np-240	3E-3					

Element	N	Radionuclides with monthly average concentration (μCi/ml)					
Plutonium (Pu)	94	Pu-234	1E-3	Pu-235	1E-1	Pu-236	6E-7
		Pu-237	2E-3	Pu-238	2E-7	Pu-239	2E-7
		Pu-240	2E-7	Pu-241	1E-5	Pu-242	2E-7
		Pu-243	2E-3	Pu-244	2E-7	Pu-245	3E-4
		Pu-246	6E-5				
Americium (Am)	95	Am-237	1E-2	Am-238	5E-3	Am-239	7E-4
		Am-240	3E-4	Am-241	2E-7	Am-242m	2E-7
		Am-242	5E-4	Am-243	2E-7	Am-244m	1E-2
		Am-244	4E-4	Am-245	4E-3	Am-246m	8E-3
		Am-246	4E-3				
Curium (Cm)	96	Cm-238	2E-3	Cm-240	1E-5	Cm-241	2E-4
		Cm-242	7E-6	Cm-243	3E-7	Cm-244	3E-7
		Cm-245	2E-7	Cm-246	2E-7	Cm-247	2E-7
		Cm-248	5E-8	Cm-249	7E-3	Cm-250	9E-9
Berkelium (Bk)	97	Bk-245	3E-4	Bk-246	4E-4	Bk-247	2E-7
		Bk-249	6E-5	Bk-250	1E-3		
Californium (Cf)	98	Cf-244	4E-3	Cf-246	5E-5	Cf-248	2E-6
		Cf-249	2E-7	Cf-250	3E-7	Cf-251	2E-7
		Cf-252	7E-7	Cf-253	5E-5	Cf-254	3E-7
Einsteinium (Es)	99	Es-250	6E-3	Es-251	1E-3	Es-253	2E-5
		Es-254m	4E-5	Es-254	2E-6		
Fermium (Fm)	100	Fm-252	6E-5	Fm-253	1E-4	Fm-254	4E-4
		Fm-255	7E-5	Fm-257	5E-6		
Mendelevium (Md)	101	Md-257	1E-3	Md-258	6E-6		
Any single radionuclide not listed above with decay mode other than alpha emission or spontaneous fission and with radioactive half-life greater than 2 hours							1E-7
Any single radionuclide not listed above that decays by alpha emission or spontaneous fission, or any mixture for which either the identity or the concentration of any radionuclide in the mixture is not known							2E-8

**Table B.2. Radionuclide Concentration and Annual Activity Limits for Disposal in a Type I Municipal Solid Waste Facility or a Hazardous Waste Facility According to 30 TAC 336.225(c) and 336.365 (Section 3.3)**

Radioisotope	Concentration Limit (Ci/m <sup>3</sup> )	Annual Generator Limit (Ci/yr)	Radioisotope	Concentration Limit (Ci/m <sup>3</sup> )	Annual Generator Limit (Ci/yr)
Fluorine-18	3E-1	8	Rhodium-106	1	30
Sodium-24	9E-4	2E-2	Ag-110m	2E-3	5E-2
Silicon-31	1E+2	3E+3	Cadmium-115m	2E-1	5
Phosphorus-32	2	50	Indium-111	9E-2	2
Phosphorus-33	10	3E+2	Indium-113m	9	2E+2
Sulfur-35	9	2E+2	Tin-113	6E-2	2
Argon-41	3E-1	8	Tin-119	20	5E+2
Potassium-42	2E-2	5E-1	Antimony-124	2E-3	5E-2
Calcium-45	4	1E+2	Iodine-123	4E-1	10
Calcium-47	2E-2	5E-1	Iodine-125	7E-1	20
Scandium-46	2E-3	5E-2	Iodine-131	4E-2	1
Chromium-51	6E-1	20	Iodine-133	2E-2	5E-1
Iron-59	5E-3	1E-1	Tellurium-129	2E-1	5
Cobalt-57	6E-2	2	Xenon-127	8E-2	2
Cobalt-58	1E-2	3E-1	Xenon-133	1	30
Zinc-65	7E-3	2E-1	Barium-140	2E-3	5E-2
Gallium-67	3E-1	8	Lanthanum-140	2E-3	5E-2
Selenium-75	5E-2	1	Cerium-141	4E-1	10
Bromine-82	2E-3	5E-2	Cerium-144	1E-3	3E-2
Rubidium-86	4E-2	1	Praseodymium-143	6	2E+2
Strontium-85	2E-2	5E-1	Neodymium-147	7E-2	2
Strontium-89	8	2E+2	Ytterbium-169	6E-2	2
Yttrium-90	4	1E+2	Iridium-192	1E-2	3E-1
Yttrium-91	4E-1	10	Gold-198	3E-2	8E-1
Zirconium-95	8E-3	2E-1	Mercury-197	8E-1	20
Niobium-95	8E-3	2E-1	Thallium-201	4E-1	10
Molybdenum-99	5E-2	1	Mercury-203	1E-1	3
Technetium-99m	1	30			

**Table B.3. Concentration Limits for Exemptions for Liquid ( $\mu\text{Ci/ml}$ ) and for Solids ( $\mu\text{Ci/g}$ ) According to 25 TAC 289.251(e)(1) and 289.251(l)(1) (see Section 5.1)**

Element (Atomic Number)	Isotope <sup>a</sup>	Concentration	Isotope <sup>a</sup>	Concentration
Antimony (51)	Sb-122	3E-4	Sb-124	2E-4
	Sb-125	1E-3		
Arsenic (33)	As-73	5E-3	As-74	5E-4
	As-76	2E-4	As-77	8E-4
Barium (56)	Ba-131	2E-3	Ba-140	3E-4
Beryllium (4)	Be-7	2E-2		
Bismuth (83)	Bi-206	4E-4		
Bromine (35)	Br-82	3E-3		
Cadmium (48)	Cd-109	2E-3	Cd-115m	3E-4
	Cd-115	3E-4		
Calcium (20)	Ca-45	9E-5	Ca-47	5E-4
Carbon (6)	C-14	8E-3		
Cerium (58)	Ce-141	9E-4	Ce-143	4E-4
	Ce-144	1E-4		
Cesium (55)	Cs-131	2E-2	Cs-134m	6E-2
	Cs-134	9E-5		
Chlorine (17)	Cl-138	4E-3		
Chromium (24)	Cr-51	2E-2		
Cobalt (27)	Co-57	5E-3	Co-58	1E-3
	Co-60	5E-4		
Copper (29)	Cu-64	3E-3		
Dysprosium (66)	Dy-165	4E-3	Dy-166	4E-4
Erbium (68)	Er-169	9E-4	Er-171	1E-3
Europium (63)	Eu-152 <sup>b</sup>	6E-4	Eu-155	2E-3
Fluorine (9)	F-18	8E-3		
Gadolinium (64)	Gd-153	2E-3	Gd-159	8E-4
Gallium (31)	Ga-72	4E-4		
Germanium (32)	Ge-71	2E-2		
Gold (79)	Au-196	2E-3	Au-198	5E-4
	Au-199	2E-3		
Hafnium (72)	Hf-181	7E-4		
Hydrogen (1)	H-3	3E-2		
Indium (49)	In-113m	1E-2	In-114m	2E-4
Iodine (53)	I-126	2E-5	I-131	2E-5
	I-132	6E-4	I-133	7E-5
	I-134	1E-3		
Iridium (77)	Ir-190	2E-3	Ir-192	4E-4
	Ir-194	3E-4		
Iron (26)	Fe-55	8E-3	Fe-59	6E-4
Lanthanum (57)	La-140	2E-4		
Lead (82)	Pb-203	4E-3		
Lutetium (71)	Lu-177	1E-3		
Manganese (25)	Mn-52	3E-4	Mn-54	1E-3
	Mn-56	1E-3		
Mercury (80)	Hg-197m	2E-3	Hg-197	3E-3
	Hg-203	2E-4		
Molybdenum (42)	Mo-99	2E-3		
Neodymium (60)	Nd-147	6E-4	Nd-149	3E-3
Nickel (28)	Ni-65	1E-3		
Niobium (Columbium) (41)	Nb-95	1E-3	Nb-97	9E-3
Osmium (76)	Os-185	7E-4	Os-191m	3E-2
	Os-191	2E-3		
			Os-193	6E-4

Element (Atomic Number)	Isotope <sup>a</sup>	Concentration	Isotope <sup>a</sup>	Concentration
Palladium (46)	Pd-103	3E-3	Pd-109	9E-4
Phosphorus (15)	P-32	2E-4		
Platinum (78)	Pt-191	1E-3	Pt-193m	1E-2
	Pt-197m	1E-2	Pt-197	1E-3
Polonium (84)	Po-210	7E-6		
Potassium (19)	K-42	3E-3		
Praseodymium	Pr-142	3E-4	Pr-143	5E-4
Promethium (61)	Pm-147	2E-3	Pm-149	4E-4
Radium (88)	Ra-226	1E-7	Ra-228	3E-7
Rhenium (75)	Re-183	6E-3	Re-186	9E-4
	Re-188	6E-4		
Rhodium (45)	Rh-103m	1E-1	Rh-105	1E-3
Rubidium (37)	Rb-86	7E-4		
Ruthenium (44)	Ru-97	4E-3	Ru-103	8E-4
	Ru-105	1E-3	Ru-106	1E-4
Samarium (62)	Sm-153	8E-4		
Scandium (21)	Sc-46	4E-4	Sc-47	9E-4
	Sc-48	3E-4		
Selenium (34)	Se-75	3E-3		
Silicon (14)	Si-131	9E-3		
Ag (47)	Ag-105	1E-3	Ag-110m	3E-4
	Ag-111	4E-4		
Sodium (11)	Na-24	2E-3		
Strontium (38)	Sr-85	1E-3	Sr-89	1E-4
	Sr-91	7E-4	Sr-92	7E-4
Sulfur (16)	S-35	6E-4		
Tantalum (73)	Ta-82	4E-4		
Technetium (43)	Tc-96m	1E-1	Tc-96	1E-3
Tellurium (52)	Te-125m	2E-3	Te-127m	6E-4
	Te-127	3E-3	Te-129m	3E-4
	Te-131m	6E-4	Te-132	3E-4
Terbium (65)	Tb-160	4E-4		
Thallium (81)	Tl-200	4E-3	Tl-201	3E-3
	Tl-202	1E-3	Tl-204	1E-3
Thulium (69)	Tm-170	5E-4	Tm-171	5E-3
Tin (50)	Sn-113	9E-4	Sn-125	2E-4
Tungsten(Wolfram ) (74)	W-181	4E-3	W-187	7E-4
Vanadium (23)	V-48	3E-4		
Ytterbium (70)	Yb-175	1E-3		
Yttrium (39)	Y-90	2E-4	Y-91m	3E-2
	Y-91	3E-4	Y-92	6E-4
	Y-93	3E-4		
Zinc (30)	Zn-65	1E-3	Zn-69m	7E-4
	Zn-69	2E-2		
Zirconium (40)	Zr-95	6E-4	Zr-97	2E-4
Beta and/or gamma emitting radioactive material not listed above with half-life less than 3 years			1E-6	

<sup>a</sup> m refers to the metastable state of that radioisotope.

<sup>b</sup> Value for the isotope Eu-152, with a half-life of 9.2 hours.

**Table B.4. Concentration Limits for Exemptions for Gases ( $\mu\text{Ci/ml}$ ) According to 25 TAC 289.251(e)(1) and 289.251(l)(1) (see Section 5.1)**

Element (Atomic Number)	Isotope	Concentration	Isotope	Concentration
Argon (18)	Ar-37	1E-3	Ar-41	1E-7
Bromine (35)	Br-82	4E-7		
Carbon (6)	C-14	1E-6		
Chlorine (17)	Cl-138	9E-7		
Fluorine (9)	F-18	2E-6		
Hydrogen (1)	H-3	5E-6		
Iodine (53)	I-126	3E-9	I-131	3E-9
	I-132	8E-8	I-133	1E-8
	I-134	2E-7		
Krypton (36)	Kr-85m	1E-6	Kr-85	3E-6
Sulfur (16)	S-35	9E-8		
Xenon (54)	Xe-131m	4E-6	Xe-133	3E-6
	Xe-135	1E-6		
Beta and/or gamma emitting radioactive material not listed above with half-life less than 3 years				1E-10

**Table B.5.Total Activity Limits for Exemptions of Individual Quantities per Container According to 25 TAC 289.251(e)(2) and 289.251(l)(2) (see Section 5.2)**

Isotope	μCi	Isotope	μCi	Isotope	μCi	Isotope	μCi
Antimony-122 (Sb-122)	100	Sb-124	10	Sb-125	10		
Arsenic-73 (As-73)	100	As-74	10	As-76	10	As-77	100
Barium-131 (Ba-131)	10	Ba-133	10	Ba-140	10		
Beryllium-7 (Be-7)	100						
Bismuth-210 (Bi-210)	1						
Bromine-82 (Br-82)	10						
Cadmium-109 (Cd-109)	10	Cd-115m	10	Cd-115	100		
Calcium-45 (Ca-45)	10	Ca-47	10				
Carbon-14 (C-14)	100						
Cerium-141 (Ce-141)	100	Ce-143	100	Ce-144	1		
Cesium-129 (Cs-129)	100	Cs-131	1,000	Cs-134m	100	Cs-134	1
		Cs-135	10	Cs-136	10	Cs-137	10
Chlorine-36 (Cl-36)	10	Cl-38	10				
Chromium-51 (Cr-51)	1,000						
Cobalt-57 (Co-57)	100	Co-58m	10	Co-58	10	Co-60	1
Copper-64 (Cu-64)	100						
Dysprosium-165 (Dy-165)	10	Dy-166	100				
Erbium-169 (Er-169)	100	Er-171	100				
Europium-152 (Eu-152), 9.2 hour half-life	100	Eu-152	1	Eu-154	1	Eu-155	10
		13 year					
Fluorine-18 (F-18)	1,000						
Gadolinium-153 (Gd-153)	10	Gd-159	100				
Gallium-67 (Ga-67)	100	Ga-72	10				
Germanium-68 (Ge-68)	10	Ge-71	100				
Gold-195 (Au-195)	10	Au-198	100	Au-199	100		
Hafnium-181 (Hf-181)	10						
Holmium-166 (Ho-166)	100						
Hydrogen-3 (H-3)	1,000						
Indium-111 (In-111)	100	In-113m	100	In-114m	10	In-115m	100
		In-115	10				
Iodine-123 (I-123)	100	I-125	1	I-126	1	I-129	0.1
		I-131	1	I-132	10	I-133	1
		I-134	10	I-135	10		
Iridium-192 (Ir-192)	10	Ir-194	100				
Iron-52 (Fe-52)	10	Fe-55	100	Fe-59	10		
Krypton-85 (Kr-85)	100	Kr-87	10				
Lanthanum-140 (La-140)	10						
Lutetium-177 (Lu-177)	100						
Manganese-52 (Mn-52)	10	Mn-54	10	Mn-56	10		
Mercury-197m (Hg-197m)	100	Hg-197	100	Hg-203	10		
Molybdenum-99 (Mo-99)	100						
Neodymium-147 (Nd-147)	100	Nd-149	100				
Nickel-59 (Ni-59)	100	Ni-63	10	Ni-65	100		
Niobium-93m (Nb-93m)	10	Nb-95	10	Nb-97	10		
Osmium-185 (Os-185)	10	Os-191m	100	Os-191	100	Os-193	100
Palladium-103 (Pd-103)	100	Pd-109	100				
Phosphorus-32 (P-32)	10						
Platinum-191 (Pt-191)	100	Pt-193m	100	Pt-193	100	Pt-197m	100
		Pt-197	100				
Polonium-210 (Po-210)	0.1						
Potassium-42 (K-42)	10	K-43	10				
Praseodymium-142 (Pr-142)	100	Pr-143	100				

Isotope	μCi	Isotope	μCi	Isotope	μCi	Isotope	μCi
Promethium-147 (Pm-147)	10	Pm-149	10				
Radon-222 (Rn-222)	100						
Rhenium-186 (Re-186)	100	Re-188	100				
Rhodium-103m (Rh-103m)	100	Rh-105	100				
Rubidium-81 (Rb-81)	10	Rb-86	10	Rb-87	10		
Ruthenium-97 (Ru-97)	100	Ru-103	10	Ru-105	10	Ru-106	1
Samarium-151 (Sm-151)	10	Sm-153	100				
Scandium-46 (Sc-46)	10	Sc-47	100	Sc-48	10		
Selenium-75 (Se-75)	10						
Silicon-31 (Si-31)	100						
Silver-105 (Ag-105)	10	Ag-110m	1	Ag-111	100		
Sodium-22 (Na-22)	10	Na-24	10				
Strontium-85 (Sr-85)	10	Sr-87m	10	Sr-89	1	Sr-90	0.1
		Sr-91	10	Sr-92	10		
Sulphur-35 (S-35)	100						
Tantalum-182 (Ta-182)	10						
Technetium-96 (Tc-96)	10	Tc-97m	100	Tc-97	100	Tc-99m	100
		Tc-99	10				
Tellurium-125m (Te-125m)	10	Te-127m	10	Te-127	100	Te-129m	10
		Te-129	100	Te-131m	10	Te-132	10
Terbium-160 (Tb-160)	10						
Thallium-200 (Tl-200)	100	Tl-201	100	Tl-202	100	Tl-204	10
Thulium-170 (Tm-170)	10	Tm-171	10				
Tin-113 (Sn-113)	10	Sn-125	10				
Tungsten-181 (W-181)	10	W-185	10	W-187	100		
Vanadium-48 (V-48)	10						
Xenon-131m (Xe-131m)	1,000	Xe-133	100	Xe-135	100		
Ytterbium-175 (Yb-175)	100						
Yttrium-87 (Y-87)	10	Y-88	10	Y-90	10	Y-91	10
		Y-92	100	Y-93	100		
Zinc-65 (Zn-65)	10	Zn-69m	100	Zn-69	1,000		
					0		
Zirconium-93 (Zr-93)	10	Zr-95	10	Zr-97	10		
Any radioactive material not listed above other than alpha emitting radioactive material							0.1

## APPENDIX C: RADIATION PRIMER

Radiation is the release of energy by the nucleus of an atom to obtain a more stable (but still radioactive) or a stable (non-radioactive) state, which is called a *decay*. Radioactive materials are detected and analyzed by measuring the radiation released by the material.

An atom consists of a nucleus in its center, containing most of the atomic mass, and electrons surrounding the nucleus, comprising most of the atomic volume. The nucleus is composed of a combination of two particles: protons and neutrons. Atoms with the same number of protons are of the same element. For example, all atoms with six protons are carbon atoms and all atoms with eight protons are oxygen atoms. The atomic number of an atom is the sum of the protons and neutrons in the nucleus.

Atoms of the same element (same number of protons) but with different number of neutrons are called *isotopes*. Isotopes of the same element have the same chemical properties but the nuclei may have different radioactive statuses. For example, beryllium (Be), which has four protons in its nucleus, has several isotopes: Be-7 (3 neutrons) has a half-life of 53.28 days and emits a gamma ray, Be-9 (5 neutrons) is stable, and Be-10 (6 neutrons) has a half-life of 1.5 million years and emits a beta particle. Both *radioisotope* and *radionuclide* are terms for an atom with a radioactive nucleus.

A metastable isotope is an atom whose nucleus has excess energy that will undergo radioactive decay by emitting the excess energy to become the isotope with a non-energized nucleus, which may still be radioactive. For example, Tc-99m will undergo radioactive decay and become the radioisotope Tc-99.

The excess energy released by the nucleus is either in the form of a light particle, also known as a photon (this is *non-ionizing* radiation), or an energized charged particle (this is *ionizing* radiation). Each type of radiation interacts with matter differently, and thus different types of detectors are required to detect and measure each type. The different kinds of detectors used to measure radiation are not discussed in this primer. The three main types of radiation are:

1. A *gamma ray*, which is a photon emitted by the nucleus (in contrast to an x-ray which is a photon emitted by changes in the position of the electrons inside an atom to a lower energy state).
2. A *beta particle*, which is an electron.
3. An *alpha particle*, which is a helium nucleus (two protons and two neutrons).

The lifespan of a specific radioisotope is measured by its half-life, which is the amount of time required for half of these radioisotopes to decay. For example: Cesium-137 (atomic number, 137; its nucleus has 55 protons and 82 neutrons) has a half-life of 30 years and, in 30 years, 2 grams of Cs-137 will have decayed to 1 gram.

A related concept is the *decay constant*, which is the probability that the radionuclide will decay within a specified time. The decay constant can be calculated using the half-life as shown in equation C.1. The decay constant of Cs-137 is 0.023 per year. A Cs-137 atom has a 2.3% probability of decaying in any year. The equation to determine how many radioactive isotopes remain after a period of time is shown in equation C.2

$$\text{Eqn. C.1} \quad \lambda = \frac{\ln(2)}{T_{1/2}}$$

$\lambda$  is the radioactive decay constant.

$\ln(2)$  is the natural log of 2, which is equal to 0.69315

$T_{1/2}$  = half-life.

$$\text{Eqn. C.2} \quad N(t) = N_0 e^{-\lambda t}$$

$N(t)$  is the number of radioactive isotopes at time  $t$ .

$N_0$  is the initial number of radioactive isotopes (at  $t = 0$ ).

$t$  is time.

The activity of a radioactive material is the number of decays that happen per unit time and is measured in units of counts per minute, disintegrations per minute, becquerel (Bq, one disintegration per second), or curie (Ci,  $3.7 \times 10^{10}$  disintegrations per second). The becquerel is the International System (SI) unit. Activity is measured by radiation detectors and can be calculated using equation C.3:

$$\text{Eqn. C.3} \quad A = \lambda N$$

$A$  is the activity.

$N$  is the number of atoms.

Radiation detectors only detect some of the radiation that enters the detector. Careful calibration of the instrument allows one to determine what percentage of radiation is detected, which is called the efficiency of the detector. The efficiency depends on the radiation type and its energy. Counts per minute (cpm) are the number of radiation particles that are detected (counted) in a minute. Disintegrations per minute (dpm) are the actual number of radiation particles emitted; dpm is calculated in equation D.4.

$$\text{Eqn. C.4} \quad \text{dpm} = \frac{\text{cpm}}{\text{efficiency}}$$

Additionally, radiation is present in the background due to naturally occurring radioactive materials and cosmic rays. This background radiation is not included in the radiation measurements to determine if a waste is at or below the exemption limits, unless the rule for that specific exemption stipulates that background be included. Therefore, a background count is typically measured (in an area close to the waste but at a sufficient distance so that the radioactivity in the waste does not affect the measurement) using the same radiation detector before measuring the waste sample. The background activity value is then subtracted from the measured activity value of the waste to obtain the activity value for the waste.

**APPENDIX IV**  
**LIQUID WASTE SOLIDIFICATION PLAN**



PERMIT AMENDMENT APPLICATION

Part IV, Appendix I

# LIQUID WASTE SOLIDIFICATION PLAN

**Edinburg Regional Disposal Facility**

**Edinburg, Hidalgo County, Texas**

**TCEQ Permit MSW-956C**

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

**November 2017**

**Project No. 1401491**



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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 constructed 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(s) will include basins that may vary in size.

#### **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. 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. In addition, the bottom of the basin will be at least 10 ft above the top of protective cover soil of the underlying constructed lining system.

#### **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 decommissioned, the City will either repurpose the metal basin for beneficial use, place it back into existing pit and fill with soil, or dispose it at the active working face. Any repurposed metal basin must 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 stabilizing material and effective processing to adequately stabilize the liquid waste.

### **2.3 Processing**

Using an excavator or similar mixing equipment, the liquid wastes will be mixed with a stabilizing material (see Appendix IVH, Special Waste Acceptance Plan) or soil 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 stabilized, the waste will be removed from the basin and deposited in the active face for landfilling.

### **2.4 Verification**

If necessary, a 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.



PERMIT AMENDMENT APPLICATION

# PERMIT AMENDMENT APPLICATION

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

Volume 1 of 4

**Prepared For:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
Professional Engineering Firm Registration Number F-2578  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

INTENDED FOR PERMITTING  
PURPOSES ONLY

July 2017  
Revised: November 2017

Project No. 1401491





PERMIT AMENDMENT APPLICATION

# PERMIT AMENDMENT APPLICATION

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

Volume 2 of 4

**Prepared For:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
Professional Engineering Firm Registration Number F-2578  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017



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Facility Name: Edinburg Regional Disposal Facility  
Permittee/Registrant Name: City of Edinburg  
MSW Authorization #:956C  
Initial Submittal Date: July 2017  
Revision Date: Administrative NOD August 2017; Revised 1<sup>st</sup> NOD November 2017



## Texas Commission on Environmental Quality

### Part I Form

New Permit/Registration and Amendment Applications for an MSW Facility

#### 1. Reason for Submittal

- Initial Submittal                       Notice of Deficiency (NOD) Response

#### 2. Authorization Type

- Permit                                       Registration

#### 3. Application Type

- New     Major Amendment  
 Major Amendment (Limited Scope)

#### 4. Application Fees

- Pay by Check                               Online Payment

If paid online, e-Pay Confirmation Number: 582EA000264970

#### 5. Application URL

Is the application submitted for Type I Arid Exempt (AE) and/or Type IV AE facility?

- Yes     No

If the answer is "No", provide the URL address of a publicly accessible internet web site where the application and all revisions to that application will be posted.

<http://www.cityofedinburg.com/pdfs/EdinburgPermitAmendmentMSW-956C.pdf>

#### 6. Application Publishing

Party Responsible for Publishing Notice:

- Applicant                                       Agent in Service                               Consultant

<b>7. Alternative Language Notice</b>
<p>Is an alternative language notice required for this application? (For determination refer to Alternative Language Checklist on the Public Notice Verification Form TCEQ-20244-Waste)</p> <p><input checked="" type="checkbox"/> Yes                      <input type="checkbox"/> No</p>

<b>8. Public Place Location of Application</b>
<p>Name of the Public Place: <b>City of Edinburg, City Hall - Secretary's Office.</b></p> <p>Physical Address: <b>415 W. University Dr.</b></p> <p>City: <b>Edinburg</b> County: <b>Hidalgo</b> State: <b>TX</b> Zip Code: <b>78541</b></p> <p>(Area code) Telephone Number: <b>956-388-1851</b></p>

<b>9. Consolidated Permit Processing</b>
<p>Is this submittal part of a consolidated permit processing request, in accordance with 30 TAC Chapter 33?</p> <p><input type="checkbox"/> Yes                      <input checked="" type="checkbox"/> No                      <input type="checkbox"/> Not Applicable</p> <p>If "Yes", state the other TCEQ program authorizations requested:</p>

<b>10. Confidential Documents</b>
<p>Does the application contain confidential documents?</p> <p><input type="checkbox"/> Yes                      <input checked="" type="checkbox"/> No</p> <p>If "Yes", cross-reference the confidential documents throughout the application and submit as a separate attachment in a binder clearly marked "CONFIDENTIAL."</p>

<b>11. Permits and/or Construction Approvals</b>	<b>Received</b>	<b>Pending</b>	<b>Not Applicable</b>
<b>Select all that apply</b>			
Hazardous Waste Management Program under the Texas Solid Waste Disposal Act	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Underground Injection Control Program under the Texas Injection Well Act	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
National Pollutant Discharge Elimination System Program under the Clean Water Act and Waste Discharge Program under Texas Water Code, Chapter 26	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prevention of Significant Deterioration Program under the Federal Clean Air Act (FCAA). Nonattainment Program under the FCAA	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
National Emission Standards for Hazardous Air Pollutants Preconstruction Approval under the FCAA	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Facility Name: Edinburg Regional Disposal Facility  
 MSW Authorization #: 956C  
 November 2017

Initial Submittal Date: July 2017  
 Revision Date: Administrative NOD August 2017; Revised 1st NOD

Select all that apply	Received	Pending	Not Applicable
Ocean Dumping Permits under the Marine Protection Research and Sanctuaries Act	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Dredge or Fill Permits under the CWA	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Licenses under the Texas Radiation Control Act	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Other Environmental Permits</b>			
<b>Air New Source Permit Account No. (HN0018R)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Air New Source Permit Registration (81830)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Air Operating Permits (2841)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12. General Facility Information
<p>Facility Name: <b>Edinburg Regional Disposal Facility</b></p> <p>MSW Authorization No. (if available): <b>956C</b></p> <p>Regulated Entity Reference No. (if issued)*: <b>RN102217734</b></p> <p>Physical or Street Address (if available): <b>8601 North Jasman Road</b></p> <p>City: <b>Edinburg</b> County: <b>Hidalgo</b> State: <b>TX</b> Zip Code: <b>78542</b></p> <p>(Area Code) Telephone Number: <b>(956) 381-5635</b></p> <p>Latitude (Degrees, Minutes Seconds): <b>N 26° 23' 53.66"</b></p> <p>Longitude (Degrees, Minutes Seconds): <b>W 98° 07' 48.22"</b></p> <p>Benchmark Elevation (above mean sea level): <b>84.85ft.</b></p> <p>Provide a description of the location of the facility with respect to known or easily identifiable landmarks: <b>6.7 miles north of Edinburg City Limits</b></p> <p>Detail access routes from the nearest United States or state highway to the facility:  <b>Exit US281 onto eastbound FM2812. Turn (left) (north) at Jasman Road.</b></p> <p><small>*If this number has not been issued for the facility, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Facility as the Regulated Entity.</small></p>

13. Facility Type(s)
<input checked="" type="checkbox"/> Type I <input type="checkbox"/> Type IV <input type="checkbox"/> Type V <input type="checkbox"/> Type I AE <input type="checkbox"/> Type IV AE <input type="checkbox"/> Type VI

14. Activities Conducted at the Facility
<input type="checkbox"/> Storage <input type="checkbox"/> Processing <input checked="" type="checkbox"/> Disposal

### 15. Facility Waste Management Unit(s)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Landfill Unit(s) | <input type="checkbox"/> Incinerator(s)                   |
| <input type="checkbox"/> Class 1 Landfill Unit(s)    | <input type="checkbox"/> Autoclave(s)                     |
| <input type="checkbox"/> Process Tank(s)             | <input type="checkbox"/> Refrigeration Unit(s)            |
| <input type="checkbox"/> Storage Tank(s)             | <input type="checkbox"/> Mobile Processing Unit(s)        |
| <input type="checkbox"/> Tipping Floor               | <input type="checkbox"/> Type VI Demonstration Unit       |
| <input type="checkbox"/> Storage Area                | <input type="checkbox"/> Compost Pile(s) and/or Vessel(s) |
| <input type="checkbox"/> Container(s)                | <input type="checkbox"/> Other (Specify)                  |
| <input type="checkbox"/> Roll-off Boxes              | <input type="checkbox"/> Other (Specify)                  |
| <input type="checkbox"/> Surface Impoundment         | <input type="checkbox"/> Other (Specify)                  |

### 16. Description of the Revisions to the Facility

Skip this box, if "New" is selected under "Application Type".

Provide a brief description of all revisions to the permit conditions and supporting documents referenced by the permit. Also, provide an explanation of why the amendment is requested.

**Major Amendment for a lateral and vertical expansion of existing TCEQ Permit MSW-956B. Change in facility's legal name to Edinburg Regional Disposal Facility.**

### 17. Facility Contact Information

**Site Operator (Permittee/Registrant) Name: City of Edinburg, Ramiro L.**

**Gomez, Jr., Director of Solid Waste Management** Customer Reference No. (if issued)\*: **CN600647978**

Mailing Address: **P.O. Box 1079**

City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78540**

(Area Code) Telephone Number: **(956) 381-5635**

Email Address: **rgomez@cityofedinburg.com**

TX Secretary of State (SOS) Filing Number:

\*If the Site Operator (Permittee/Registrant) does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Site Operator (Permittee/Registrant) as the Customer.

**Operator Name<sup>1</sup>: "Same as "Site Operator Permittee"**

Customer Reference No. (if issued)\*:

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

Email Address:

TX SOS Filing Number:

<sup>1</sup>If the Operator is the same as Site Operator/Permittee type "Same as "Site Operator (Permittee/Registrant)".

\*If the Operator does not have this number, complete a TCEQ Core Data Form (TCEQ-10400) and submit it with this application. List the Operator as the customer.

**Consultant Name (if applicable): Golder Associates Inc. Chad Ireland, Senior Project Geological Engineer (Texas PE 99293)**

Texas Board of Professional Engineers Firm Registration Number: **F-2578**

Mailing Address: **500 Century Plaza Drive, Suite 190**

City: **Houston** County: **Harris** State: **TX** Zip Code: **77073**

(Area Code) Telephone Number: **(281) 821-6868**

E-Mail Address: **cireland@golder.com**

**Agent in Service Name (required only for out-of-state): N/A**

Mailing Address:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-Mail Address:

**18. Facility Supervisor's License**

Select the Type of License that the Solid Waste Facility Supervisor, as defined in 30 TAC Chapter 30, Occupational Licenses and Registrations, will obtain prior to commencing facility operations.

Class A       Class B

**19. Ownership Status of the Facility**

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Corporation         | <input type="checkbox"/> Limited Partnership        | <input type="checkbox"/> Federal Government |
| <input type="checkbox"/> Individual          | <input checked="" type="checkbox"/> City Government | <input type="checkbox"/> Other Government   |
| <input type="checkbox"/> Sole Proprietorship | <input type="checkbox"/> County Government          | <input type="checkbox"/> Military           |
| <input type="checkbox"/> General Partnership | <input type="checkbox"/> State Government           | <input type="checkbox"/> Other (Specify):   |

Does the Site Operator (Permittee/Registrant) own all the facility units and all the facility property?

Yes                       No

If "No", provide the information requested below for any additional ownership.

**Owner Name:**

Street or P.O. Box:

City:                      County:                      State:                      Zip Code:

(Area Code) Telephone Number:

Email Address (optional):

**20. Other Governmental Entities Information**

**Texas Department of Transportation District: Pharr**

District Engineer's Name: **Toribio Garza Jr., P.E.**

Street Address or P.O. Box: **600 W. US Expressway 83**

City: **Pharr** County: **Hidalgo** State: **TX** Zip Code: **78511-1231**

(Area Code) Telephone Number: **(956) 702-6101**

E-Mail Address (optional):

**The Local Governmental Authority Responsible for Road Maintenance (if applicable): Public Works**

Contact Person's Name: **Ponciano N. Longoria, Director of Public Works**

Street Address or P.O. Box: **415 W. University Drive**

City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78541**

(Area Code) Telephone Number: **(956) 388-8210**

E-Mail Address (optional): **plongoria@cityofedinburg.com**

**City Mayor Information**

City Mayor's Name: **Richard H Garcia**

Office Address: **415 W. University Drive**

City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78541**

(Area Code) Telephone Number: **(956) 388-8204**

E-Mail Address (optional):

**City Health Authority: N/A**

Contact Person's Name:

Street Address or P.O. Box:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-Mail Address (optional):

**County Judge Information**

County Judge's Name: **Honorable Ramon Garcia**

Street Address or P.O. Box: **100 E. Cano St., 2<sup>nd</sup> Floor**

City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78539**

(Area Code) Telephone Number: **(956) 318-2600**

E-Mail Address (optional):

**County Health Authority: Hidalgo County Health Department**

Contact Person's Name: **Eduardo Olivarez**

Street Address or P.O. Box: **1304 South 25<sup>th</sup> Ave.**

City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78539**

(Area Code) Telephone Number: **(956) 383-6221**

E-Mail Address (optional):

**State Representative Information**

District Number: **40**

State Representative's Name: **Terry Canales**

District Office Address: **101 North 10<sup>th</sup> Avenue, Suite B**

City: **Edinburg** County: **Hidalgo** State: **TX** Zip Code: **78541**

(Area Code) Telephone Number: **(956) 383-0860**

E-Mail Address (optional):

**State Senator Information**

District Number: **20**

State Senator's Name: **Honorable Juan "Chuy" Hinojosa**

District Office Address: **612 Nolana, Suite 410B**

City: **McAllen** County: **Hidalgo** State: **TX** Zip Code: **78504**

(Area Code) Telephone Number: **(956) 972-1841**

E-Mail Address (optional):

**Council of Government (COG) Name: Lower Rio Grande Valley Development**

**Council**

COG Representative's Name: **Ron Garza**

COG Representative's Title: **Executive Director**

Street Address or P.O. Box: **301 W. Railroad St.**

City: **Weslaco** County: State: **TX** Zip Code: **78591**

(Area Code) Telephone Number: **(956) 682-3481**

E-Mail Address (optional): **rongarza@lrgvdc.org**

**River Basin Authority Name: N/A**

Contact Person's Name:

Watershed Sub-Basin Name:

Street Address or P.O. Box:

City: County: State: Zip Code:

(Area Code) Telephone Number:

E-Mail Address (optional):

**Coastal Management Program**

Is the facility within the Coastal Management Program boundary?

Yes  No

**U.S. Army Corps of Engineers**

The facility is located in the following District of the U.S. Army Corps of Engineers:

Albuquerque, NM  Galveston, TX

Ft. Worth, TX  Tulsa, OK

**Local Government Jurisdiction**

Within City Limits of: **Edinburg**

Within Extraterritorial Jurisdiction of: **Edinburg**

Is the facility located in an area in which the governing body of the municipality or county has prohibited the storage, processing or disposal of municipal or industrial solid waste?

Yes  No

(If "Yes", provide a copy of the ordinance or order as an attachment):

**Signature Page**

I, Ramiro L. Gomez, Jr.,  
Department,

Director Solid Waste Management

(Site Operator (Permittee/Registrant)'s Authorized Signatory)

(Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

-----  
TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR

I, \_\_\_\_\_, hereby designate \_\_\_\_\_  
(Print or Type Operator Name) (Print or Type Representative Name)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

\_\_\_\_\_  
Printed or Typed Name of Operator or Principal Executive Officer

\_\_\_\_\_  
Signature

-----  
SUBSCRIBED AND SWORN to before me by the said \_\_\_\_\_

On this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

My commission expires on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

\_\_\_\_\_  
Notary Public in and for

\_\_\_\_\_ County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)

## Part I Attachments

(See Instructions for P.E. seal requirements.)

### Required Attachments

### Attachment No.

Supplementary Technical Report

Property Legal Description

Property Metes and Bounds Description

Facility Legal Description

Facility Metes and Bounds Description

Metes and Bounds Drawings

On-Site Easements Drawing

Land Ownership Map

Land Ownership List

Electronic List or Mailing Labels

Texas Department of Transportation (TxDOT) County Map

General Location Map

General Topographic Map

Verification of Legal Status

Property Owner Affidavit

Evidence of Competency

### Additional Attachments as Applicable- Select all those apply and add as necessary

TCEQ Core Data Form(s)

Signatory Authority Delegation

Fee Payment Receipt

Confidential Documents

Waste Storage, Processing and Disposal Ordinances

Final Plat Record of Property

Certificate of Fact (Certificate of Incorporation)

Assumed Name Certificate



PERMIT AMENDMENT APPLICATION  
Part I

# FACILITY AND APPLICANT INFORMATION

## SUPPLEMENTARY TECHNICAL REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78541 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017



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

INTENDED FOR PERMITTING  
PURPOSES ONLY

Project No. 1401491



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IA3	Permit Boundary Metes and Bounds Legal Description
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IA5	Property Owner Affidavit
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IC4	Agent Appointment of Consulting and Design Engineering Firm
Appendix ID	Documentation of Application Fee Payment



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

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## **1.0 FACILITY AND APPLICANT INFORMATION**

### **1.1 Application**

30 TAC §§330.57(i)(1), 330.59(a)(1), 305.45(a)(3), 305.45(a)(4), & 281.5(1)&(4)

The City of Edinburg submits this permit amendment application for the Edinburg Regional Disposal Facility, TCEQ Permit MSW-956C, a Type I municipal solid waste (MSW) disposal facility. This permit amendment application has been prepared consistent with 30 Texas Administrative Code (TAC) Chapter 330 Municipal Solid Waste Regulations adopted by the Texas Commission on Environmental Quality (TCEQ).

Part I of this permit amendment application contains information about the site and applicant, as required by 30 TAC §§281.5, 305.45, and 330.59. Part II of the permit amendment application describes waste acceptance, existing conditions and the character of the facility and surrounding area, as required by 30 TAC §330.61. Part III of the permit amendment application presents engineering information, detailed investigative reports, the schematic designs of the facility, and the required plans, as required by 30 TAC §330.63. Part IV of the permit amendment application contains the Site Operating Plan, which includes specific information regarding the daily operations of the site, as required by 30 TAC §330.65.

Upon submittal of this application to the Texas Commission of Environmental Quality (TCEQ), the City of Edinburg shall post a complete copy, including all revisions and supplements, for information purposes at <http://www.cityofedinburg.com>.

### **1.2 General Facility Information**

#### **1.2.1 Location Description, Facility Name, Mailing Address**

30 TAC §§305.45(a)(1) & 305.59(b)(1)

Edinburg Regional Disposal Facility  
P.O. Box 1079  
Edinburg, Hidalgo County, Texas 78540

Edinburg Regional Disposal Facility TCEQ Permit MSW-956C is located approximately 1,900 feet east of U.S. Hwy 281 and 3,200 feet north of FM 2812 in Edinburg, Hidalgo County, Texas. Figure I-1 shows the facility location.

### 1.2.2 Access Routes

30 TAC §305.59(b)(2)

The facility entrance is located at 8601 Jasman Road north of FM 2812 and is shared with the City’s Type IV Landfill TCEQ Permit MSW-2302. The access route to the facility from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Road. An additional facility access route, used only for landfill operations and maintenance vehicles as well as for emergency response vehicles from US Hwy 281, is eastbound on Encinitos Road. Figure I-1 shows access routes via major roadways to facility.

### 1.2.3 Geographic Coordinates

30 TAC §305.59(b)(3)

Geographical coordinates of the facility represented by the permanent site benchmark are:

Latitude: N 26° 23' 53.66"  
 Longitude: W 98° 07' 48.22"  
 Elevation: 84.85 ft-msl

The permanent site benchmark monument, a bronze marker set in concrete with the benchmark elevation and survey date stamped on it, is established in an area that is readily accessible and will not be used for disposal. The monument elevation was surveyed from a known United States Coast and Geodetic Survey benchmark. Figure I-1 shows the location of the benchmark in relation to the facility.

## 1.3 Maps

30 TAC §§305.45(a)(6), 330.59(c)(1), & 330.59(c)(2)

**Table I-1: Maps**

Figure	Title	Citation
I-1	Facility Location Map	30 TAC §330.59(c)(1)
I-2	TxDOT County Map	30 TAC §330.59(c)(2)
I-3	USGS Topographic Map	30 TAC §305.45(a)(6)(A)
I-4	Land Use Map	30 TAC §305.45(a)(6)(B)
I-5	Land Ownership Map	30 TAC §305.45(a)(6)(D) & §330.59(c)(3)(A)

Note: 1. No storm water intake or discharge structures are located within facility according to Part III2, Surface Water Drainage Report.  
 2. All waste disposal activities conducted on the tract are included in this application.

### 1.3.1 Facility Location Map

30 TAC §330.59(c)(1)

The Facility Location Map illustrates the expansion permit boundary in relation to the permit boundary for TCEQ Permit MSW-956B, Type IV Landfill TCEQ Permit MSW-2302, and the landfill facilities that serve both landfills.

### **1.3.2 TxDOT County Map**

30 TAC §330.59(c)(2)

The TxDOT County Map illustrates the expansion permit boundary with a base map taken from a portion of county maps prepared by Texas Department of Transportation (TxDOT) with a scale of one-half inch equals one mile.

### **1.3.3 USGS Topographic Map**

30 TAC §§305.45(a)(6) & 305.45(a)(6)(A)

The USGS Topographic Map depicts the expansion permit boundary with a base map taken from the United States Geological Survey (USGS) 7-1/2-minute quadrangle sheets with a scale of one inch equals one mile and illustrates each well, spring, and surface water body or other water in the state within the map area.

### **1.3.4 Land Use Map**

30 TAC §305.45(a)(6)(B)

The Land Use Map is a constructed map showing the facility boundary and land uses within 1 mile such as commercial, industrial, residential, recreational, institutional, and open areas used for agricultural, pastureland, or roadways.

## **1.4 Land Ownership Map and Land Ownership List**

30 TAC §§305.45(a)(6)(D) & 330.59(c)(3), & 281.5

The Land Ownership Map locates the property owned by adjacent and potentially affected landowners within a quarter-mile of the facility. No mineral interest ownership under the facility nor facility easement holders were located in the Hidalgo County Appraisal District records as of the date of this application. Mineral interest owners and easement holders known to the City have been included on the landowner's list. The landowner's list is provided in electronic format on an enclosed compact disc.

## **1.5 Legal Description**

30 TAC §330.59(d)

Legal description documentation is provided in Appendix IA.

### **1.5.1 Ownership Record**

30 TAC §330.59(d)(1)(A)

The current ownership record of facility property and pipeline easements is provided in Appendix IA1.

### **1.5.2 Plat Records**

30 TAC §330.59(d)(1)(B)

Plats of facility property is provided in Appendix IA2.

### **1.5.3 Boundary Metes and Bounds Description**

30 TAC §330.59(d)(1)(C)

A boundary metes and bounds description of the facility signed and sealed by a registered professional land surveyor is provided in Appendix IA3.

### **1.5.4 Boundary Metes and Bounds Exhibit**

30 TAC §330.59(d)(1)(D)

A boundary metes and bounds exhibit of the facility signed and sealed by a registered professional land surveyor is provided in Appendix IA4.

### **1.5.5 Property Owner Affidavit**

30 TAC §330.59(d)(2)(D)

A property owner affidavit signed by the owner is provided in Appendix IA5.

## **1.6 Legal Authority**

### **1.6.1 Legal Status**

30 TAC §330.59(e)

The sole owner and operator of the Edinburg Regional Disposal Facility is the City of Edinburg. Under Texas law the City has the responsibility to provide for the management of solid waste generated by residences and businesses within its city limits. The City Charter establishes that the City Manager is the chief executive officer of the City. As the City's executive officer, the City Manager or designee is designated to sign the application. No other person or entity owns more than 20 percent of the facility.

### 1.6.2 Ownership Status

30 TAC §305.45(a)(2)

The City of Edinburg is a Texas home-rule municipality.

### 1.7 Evidence of competency

30 TAC §330.59(f)

The applicant for this landfill amendment is the City of Edinburg, who is also the owner of the Edinburg Regional Disposal Facility. The sections below provide evidence of competency information for City of Edinburg officials and Edinburg Regional Disposal Facility management and personnel.

#### 1.7.1 Solid Waste Facility Ownership and Operation

30 TAC §§330.59(f)(1) & 330.59(f)(2)

The Edinburg Regional Disposal Facility is owned and operated by the City of Edinburg. The Type I landfill facility has been operating in good standing with the State of Texas since December 1976. The City of Edinburg owns the adjacent Type IV Landfill, which it has operated since 2006. Below is a list of Texas Solid Waste Sites Owned/Operated by the City of Edinburg within the last ten years.

**Table I-2: Solid Waste Facilities**

Site Name	Type	TCEQ Permit	County	Dates of Operation
Edinburg Sanitary Landfill	Type I	MSW-956B	Hidalgo	1976 to present
Type IV Landfill	Type IV	MSW- 2302	Hidalgo	2006 to present

#### 1.7.2 Licensed Solid Waste Facility Supervisor

30 TAC §330.59(f)(3)

##### **Mr. Ramiro L. Gomez, Jr. Director, Department of Solid Waste Management**

Mr. Gomez is licensed pursuant to 30 TAC Chapter 30 and has over 16 years of experience in solid waste collections, disposal, and recycling. Mr. Gomez 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 municipal solid waste, health and safety, and waste identification. The Director or designated alternate will serve as the emergency coordinator for the facility. Mr. Gomez manages a staff of 95 employees in 8 service activities and ensures ongoing education, safety and training programs for the department.

Ramiro Gomez has been with the City of Edinburg since June 2000 and has been Director in charge of all solid waste collection, processing and disposal operations for the last thirteen years. Mr. Gomez directs and oversees all aspects of the Solid Waste System and leads a complement of 95 Professionals, Managers, Supervisors, Drivers and Support Personnel. Mr. Gomez administers all quality control and regulatory compliance aspects of the system, permit development and implementation functions of both the disposal and processing system, and administers all aspects of capital construction projects and expenditures.

Prior to coming to work for the City of Edinburg, Mr. Gomez worked for the City of Roma Water Processing and Distribution System before being hired on as a Planner with the Lower Rio Grande Valley Development Council. Mr. Gomez currently serves as Chairman of the Regional Solid Waste Advisory Committee.

**Facility Supervisor**

The Director of Solid Waste Management (DSWM) will appoint a Site Manager (SM) to provide on-site management of the daily facility operations. The Site Manager will be an experienced manager/supervisor, 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 municipal solid waste, health and safety, and waste identification.

**1.7.3 City of Edinburg Officials**

30 TAC §330.59(f)(4)

Synopsis of the City Officials and their initial Election Date.

**Table I-3: City of Edinburg Officials**

Richard H. Garcia	Mayor
Richard H. Garcia is a Federal Criminal Law Attorney and a senior partner with an established law firm. He is currently serving his second term as Mayor of the City of Edinburg, having served from 2003-2006	
J.R. Betancourt	Mayor Pro Tem
J.R. Betancourt is a certified public accountant and business consultant and owner of Joel R. Betancourt, CPA PLLC. He is also a partner with Betancourt & Garza LLP.	
Homer Jasso Jr.	Councilmember
Homer Jasso, Jr. is a business man and owner of Superior Oil Express in Mission. Jasso has been on the Edinburg City Council since 2012 and is currently serving his second term.	
Richard Molina	Councilmember

Richard Molina is the owner and manager of Molina Rental Properties in Edinburg. He is a U.S. Army veteran and former City police sergeant.	
David Torres	Councilmember
David Torres is a businessman and entrepreneur. He is the owner of David's Bail Bonds, At Home Health Care, A-Lightning Bail Bonds, Torres Rental Properties, and JDRED Investments.	
Richard Hinojosa	City Manager
Mr. Hinojosa has twenty-three (23) years of Municipal Government experience working for the Cities of Edinburg, McAllen, San Juan and San Benito. Mr. Hinojosa has fifteen (15) years of experience working for the Lower Rio Grande Valley Development Council the Council of Governments representing the three County region of Cameron, Hidalgo and Willacy. Mr. Hinojosa has worked for the City of Edinburg for sixteen (16) years and assumed the position of City Manager on December 7, 2015.	

### 1.7.4 Landfilling Experience and Dedicated Equipment

30 TAC §330.59(f)(5)

The City of Edinburg has been successfully operating the Edinburg Regional Disposal Facility in compliance with Texas municipal solid waste regulations since 1976.

Sufficient equipment will be provided at the facility to conduct site operations in accordance with the design of the facility, the method of landfill operations, the rate of waste acceptance, and the permit conditions. Part IV, Site Operating Plan provides a description, including the minimum number, size, type, and function of the equipment to be utilized at the facility based on the estimated waste acceptance rate and other operational requirements.

Subject to the description of equipment in Part IV, the following is a list of equipment generally expected to be available for use at the facility. Other equivalent types of equipment may be substituted for this equipment on an as-needed basis.

**Table I-4: Equipment List**

Equipment Type	Waste Acceptance Rate <sup>(1)(2)</sup> (Tons Per Year)				Minimum Size <sup>(3)</sup>	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

Equipment Type	Waste Acceptance Rate <sup>(1)(2)</sup> (Tons Per Year)				Minimum Size <sup>(3)</sup>	Function
	Less Than 350,000	350,001 to 750,000	750,001 to 1,250,000	1,250,001 to 1,750,000		
						compaction, fire protection
Excavator <sup>(2)</sup>	1	1	1	1	2.5 cy bucket	Excavation of soil, fire protection
Haul Truck <sup>(2)</sup>	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

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.

## 1.8 Signatory Authority Delegation

30 TAC §§330.59(g) & 330.44

### 1.8.1 Appointments

30 TAC §330.59(g)

Provided in Appendix 1D is a Resolution of the City of Edinburg for an Appointment of Applicant's Agent by the City of Edinburg duly appointing Mr. Richard M. Hinojosa, City Manager and Mr. Ramiro L. Gomez Jr., Director of Department of Solid Waste Management as its agent and signatory in matters concerning the application to amend TCEQ Permit MSW-956B. Also included is an Appointment of Applicant's Agent by the City of Edinburg retaining Golder Associates Inc. as consulting and designing engineers.

### 1.8.2 Application Signature

30 TAC §§330.44(a)(3) & 330.44(b)

This application for an amendment application submitted by the City of Edinburg is signed in accordance to §330.44(a)(3)&(b) on the Part I Form.

## 1.9 Permits and Construction Approvals

30 TAC §330.45(a)(7)

The City of Edinburg has not received or applied for permits under any of the following programs:

- Hazardous Waste Management Program under the Texas Solid Waste Disposal Act;
- Underground Injection Control Program under the Texas Injection Well Act;
- National Pollutant Discharge Elimination System Program under the Clean Water Act and Waste Discharge Program under Texas Water Code, Chapter 26;
- Prevention of Significant Deterioration Program under the Federal Clean Air Act (FCAA);
- Nonattainment Program under the FCAA;
- national emission standards for hazardous air pollutants preconstruction approval under the FCAA;
- ocean dumping permits under the Marine Protection Research and Sanctuaries Act;
- dredge or fill permits under the FCAA;
- licenses under the Texas Radiation Control Act; and
- subsurface area drip dispersal system permits under Texas Water Code, Chapter 32.

Other environmental permits received or applied for are summarized in Table I-5.

**Table I-5 Permits, Registrations, or Other Authorizations**

Program	ID Type	ID Number
Air Emissions Inventory	Account Number	HN0018R
Air New Source Permits	Account Number	HN0018R
Air New Source Permits	AFS Number	4821500651
Air New Source Permits	Registration	81830
Air Operating Permits	Permit	2841
Municipal Solid Waste Disposal	Permit	2302
Municipal Solid Waste Disposal	Permit	956 (Cancelled)
Municipal Solid Waste Disposal	Permit	956A (Inactive)
Municipal Solid Waste Disposal	Permit	956B
Sludge	Registration	23165 (Cancelled)
Stormwater	Permit	TXR05O693 (Expired)
Stormwater	Permit	TXR05Y266
Used Oil	Registration	HAU0055
Water Quality Non Permitted	ID Number	TXR05A393 (Inactive)
Air Emissions Inventory	Account Number	HN0018R
Air New Source Permits	Account Number	HN0018R
Air New Source Permits	AFS Number	4821500651

Program	ID Type	ID Number
Air New Source Permits	Registration	81830
Air Operating Permits	Permit	2841
Municipal Solid Waste Disposal	Permit	2302

## 1.10 Application Fees

30 TAC §330.59(h)

On behalf of the City of Edinburg, Golder Associates Inc. has made payment of the \$150 permit amendment application fee. This fee was paid online using TCEQ e-pay at [www.tceq.state.tx.us/e-service/index.html](http://www.tceq.state.tx.us/e-service/index.html) and the e-pay receipt is provided in Appendix ID.

## 2.0 SUPPLEMENTARY TECHNICAL REPORT

30 TAC §305.45(a)(8)

This report is prepared by a Texas licensed professional engineer experienced in the field to which the application relates and thoroughly familiar with the operation for which the application is made.

### 2.1 General Description

30 TAC §305.45(a)(8)(A)

The Edinburg Sanitary Landfill is an active, 253.5-acre Type I municipal solid waste (MSW) facility owned and operated by the City of Edinburg, Texas (City) under TCEQ Permit MSW-956B. This facility is located approximately 1,900 feet east of US Hwy 281 and 3,200 feet north of FM 2812 in Edinburg, Hidalgo County, Texas.

Within its permit boundary, the total area consists of a total of 192.9 acres of permitted waste disposal and 60.6 acres of non-waste disposal. Waste disposal areas include 29.2 acres of Pre-Subtitle D Units 1-4 with final cover in place, and 163.7 acres of Subtitle D, Units 5-6.

#### 2.1.1 Permit History

The Edinburg Sanitary Landfill TCEQ Permit MSW-956, was a 100.0-acre MSW facility permitted in December 10, 1976 which included waste disposal Units 1-5. Of these units, the eastern 29.2 acres included Pre-Subtitle D Units 1-4 that currently has final cover in place with slopes of approximately 2% and the western 52.9 acres, Unit 5, was upgraded to Subtitle D requirements with a Class I Permit Modification submitted to the TNRCC on October 7, 1994.

A vertical expansion amendment to the 100.0-acre MSW facility, Edinburg Sanitary Landfill TCEQ Permit MSW-956A, was issued on October 9, 1996 increasing the maximum fill elevation of Unit 5 to approximately 145 ft-msl and also included drainage revisions.

A lateral expansion amendment for a 253.5-acre MSW facility, Edinburg Sanitary Landfill TCEQ Permit MSW-956B, was issued on July 18, 2002. This lateral expansion added approximately 110.8 acres of waste disposal area, Unit 6, east of Pre-Subtitle D Units 1-4 with a maximum fill elevation of approximately 213 ft-msl.

### **2.1.2 Lateral and Vertical Expansion**

The lateral and vertical expansion amendment for a 602.5-acre MSW facility, Edinburg Regional Disposal Facility TCEQ Permit MSW-956C, adds 213.1 acres of waste disposal area including 205.7 acres, Unit 7, located east and north east of Unit 6 and 7.4 acres between Pre-Subtitle D Units 1-4 and Unit 6.

Waste disposal areas Units 1-4 and the additional 7.4 acres will be developed as one of two options; an Overliner or Unit 8. The Overliner option includes construction of a lining system over the in-place final cover of Pre-Subtitle D Units 1-4 and the Unit 8 option will relocate the waste within Pre-Subtitle D Units 1-4. The elevation of the deepest excavation is 70 ft-msl and the maximum final contour elevation is 398 ft-msl. Figure I-5 illustrates waste disposal area locations.

## **2.2 Disposal Volume and Rates**

30 TAC §305.45(a)(8)(B)(i)

Edinburg Regional Disposal Facility TCEQ Permit MSW-956C has a waste disposal area of 406.0 acres with a total disposal capacity 87,301,156 cubic yards. According to the FY 2016 MSW Annual Report for TCEQ Permit MSW-956B, the facility received approximately 494,319 tons of waste and has 5,738,691 cubic yards of remaining airspace.

The waste acceptance rate will vary over the life of the facility depending on market conditions. With a resulting 76,304,934 cubic yards of remaining airspace, the site life is extended to over 60 years and the rate of waste disposal could reach approximately 1,625,000 tons per year. The total disposal capacity and site life calculations are provided in Part III3A, Volume and Site Life Calculations.

<b>Table I-6: Permit Condition Comparison</b>	<b>TCEQ Permit MSW-956B</b>	<b>TCEQ Permit MSW-956C</b>
Permitted Area (acre)	253.5	602.5
Waste Disposal Unit Area (acre)	192.9	406.0
Buffer/Other Area (acre)	60.6	196.5

<b>Table I-6: Permit Condition Comparison</b>	<b>TCEQ Permit MSW-956B</b>	<b>TCEQ Permit MSW-956C</b>
Remaining Capacity (cubic yards)	5,738,691	76,304,934
Remaining Projected Site Life (years)	8 years	64 years
Maximum Elevation (ft-msl)	213	398
Elevation of Deepest Excavation (ft-msl)	70	70

## 2.3 Properties of Waste

30 TAC §305.45(a)(8)(B)(ii)

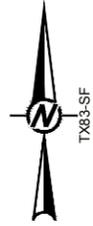
Waste authorized for acceptance at the facility in accordance with Part II, Waste Acceptance Plan will be appropriate for a Type I municipal solid waste disposal facility and will not have constituents or characteristics that will negatively impact or influence the design and operation of the facility.

## 2.4 Other Information

30 TAC §305.45(a)(8)(C)

Both the Edinburg Regional Disposal Facility, TCEQ Permit MSW-956B, and the Type IV Landfill, TCEQ Permit MSW-2302, share a common entrance and certain facilities and equipment. Existing structures/areas located at the facility, which will remain as part of this permit amendment application, include:

- Landfill administrative office
- Gatehouse and scales
- Citizen collection station
- Landfill gas to energy facility including landfill flare and blower
- Reusable material staging area
- Large item salvage and white goods storage area
- Fuel storage tank



W 98° 09' 00"  
N 26° 25' 00"

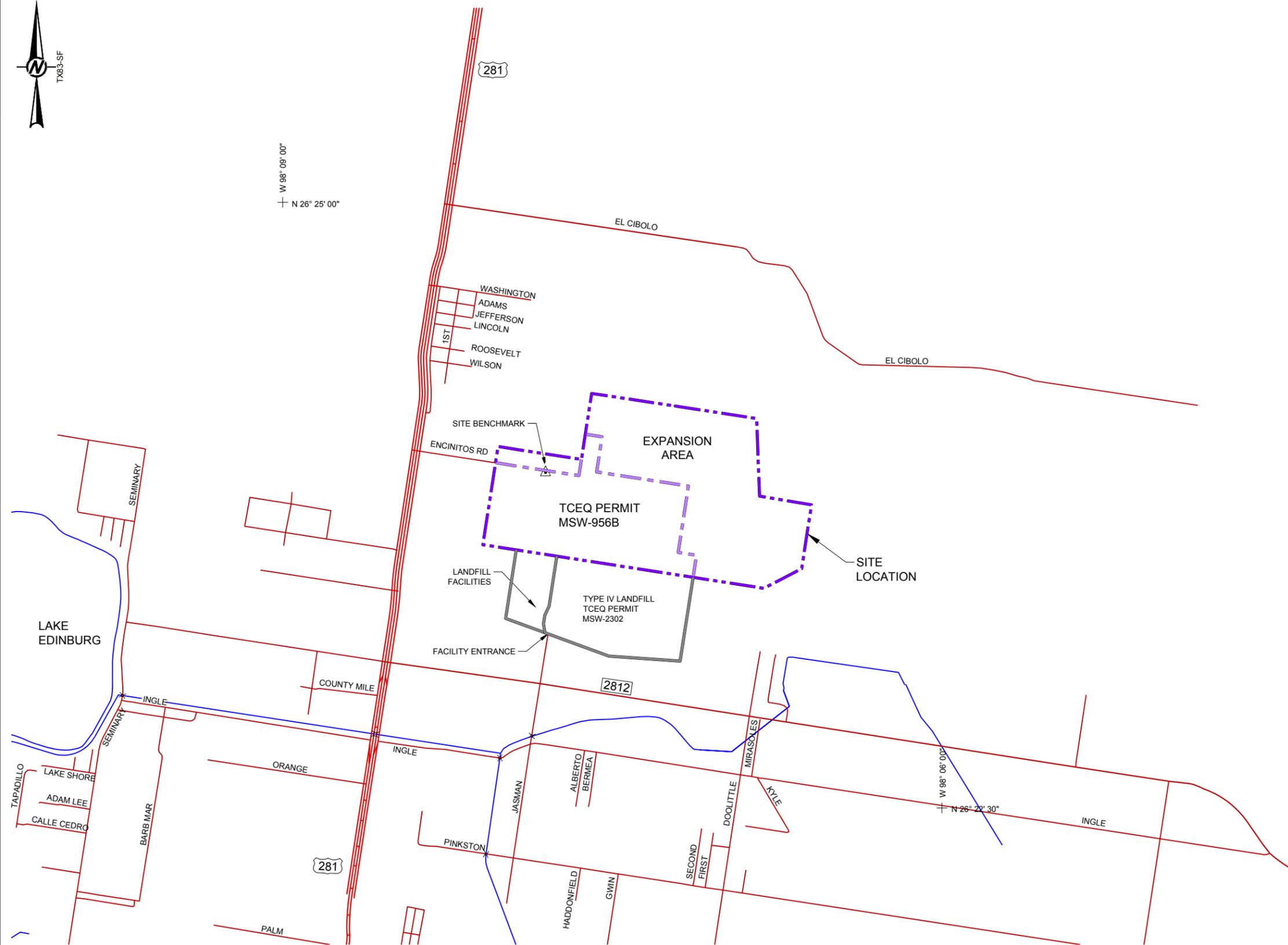
- LEGEND**
- EXPANSION PERMIT BOUNDARY
  - PERMIT BOUNDARY TCEQ PERMIT MSW-956B
  - SITE BENCHMARK

- NOTE(S)**
1. NO STORM WATER INTAKE OR DISCHARGE STRUCTURES.
  2. REFER TO FIGURE I-6 FOR STRUCTURES ASSOCIATED WITH THE FACILITY'S DISPOSAL ACTIVITIES INCLUDING AN OUTLINE OF THE SOLID WASTE MANAGEMENT UNITS, INTERIOR ROADS, AND SURFACE WATER DRAINAGE FEATURES AS WELL AS ENTRANCE FACILITY STRUCTURES INCLUDING OFFICE, MAINTENANCE BUILDINGS, GATEHOUSE AND SCALES, AND ENTRANCE ROAD.

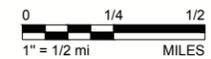
**SITE BENCHMARK COORDINATES**

GEODETIC		TEXAS STATE PLANE SOUTH ZONE NAD 83		SITE GRID		ELEVATION
LATITUDE	LONGITUDE	NORTHING	EASTING	NORTHING	EASTING	MSL
N 26° 23' 53.66"	W 98° 07' 48.22"	16,670,266.0'	1,105,344.6'	2042.5'	1264.5'	84.85'

**REFERENCE(S)**  
BASE MAP TAKEN FROM TEXAS DEPARTMENT OF TRANSPORTATION, TXDOT URBAN FILE 2003 FOR HIDALGO COUNTY, DOWNLOADED FROM TNRIS.ORG



**ISSUED FOR PERMITTING PURPOSES ONLY**



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	MGC	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CONSULTANT

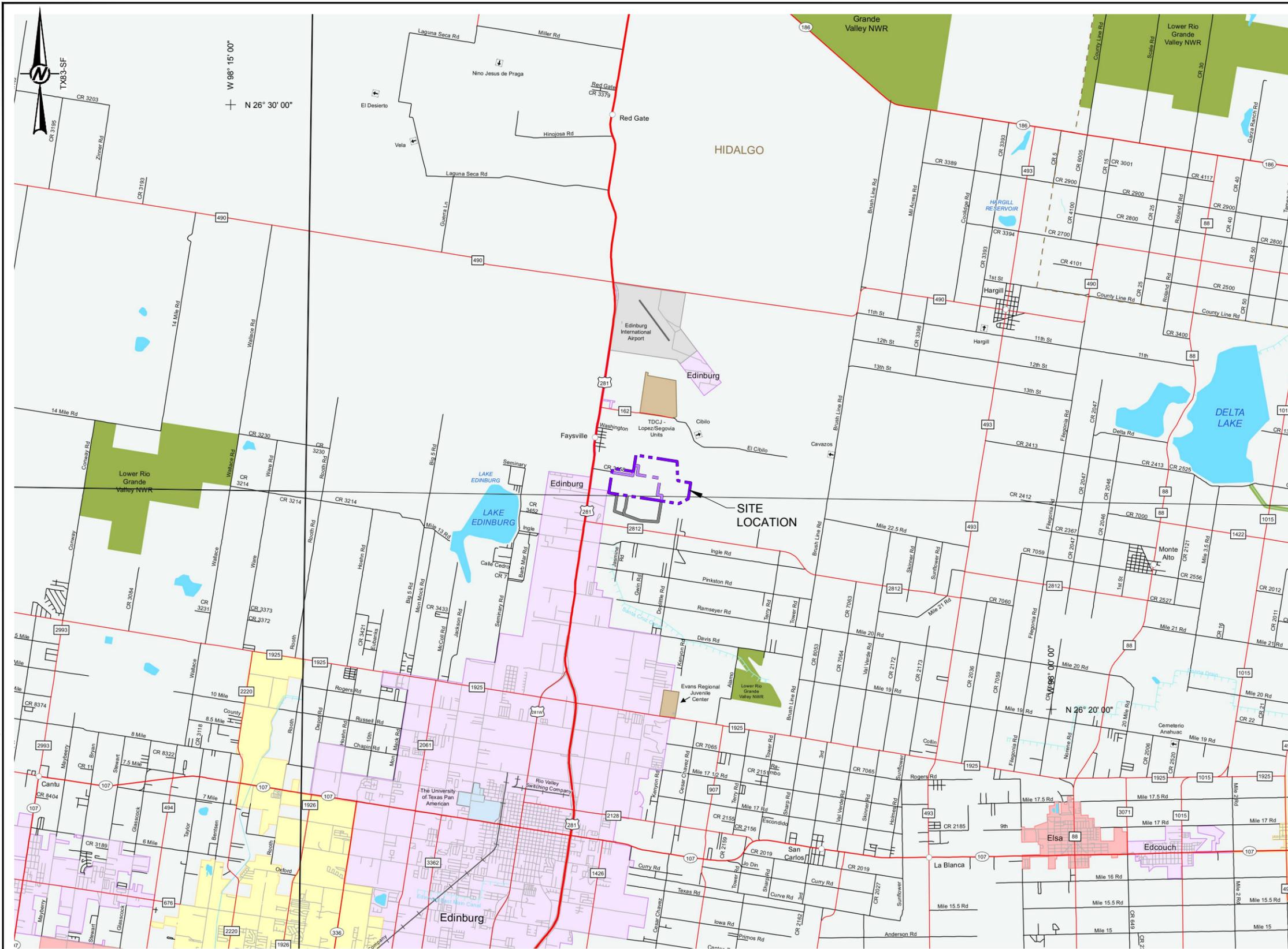
HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FACILITY LOCATION MAP**

PROJECT NO. 1401491	APPLICATION SECTION I	REV. 1	1 of 5	FIGURE I-1
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**COUNTY MAPBOOK 2012 LEGEND**

- IH, BI
- US, BU, UA, UP
- SH, BS
- SL, SS, PR
- FM, BF, RM, RR, RE, RS, PA
- County Road
- City Street or other
- Non-County Maintained Road
- Railroad
- Incorporated City
- Unincorporated Community
- Airport
- Airport Runway
- School
- Military Installation
- Prison
- National or State Park
- Cemetery
- Dam
- County Line
- District Line
- Canal
- Flowing Stream
- Intermittent Stream
- River
- Gulf Intracoastal Waterway
- Other Body of Water

**LEGEND**

- EXPANSION PERMIT BOUNDARY
- PERMIT BOUNDARY TCEQ PERMIT MSW-956B

**NOTE(S)**

- NO STORM WATER INTAKE OR DISCHARGE STRUCTURES.
- REFER TO FIGURE I-6, FACILITY LAYOUT PLAN FOR STRUCTURES ASSOCIATED WITH THE FACILITY'S DISPOSAL ACTIVITIES INCLUDING AN OUTLINE OF THE SOLID WASTE MANAGEMENT UNITS, INTERIOR ROADS, AND SURFACE WATER DRAINAGE FEATURES AS WELL AS ENTRANCE FACILITY STRUCTURES INCLUDING OFFICE, MAINTENANCE BUILDINGS, GATEHOUSE AND SCALES, AND ENTRANCE ROAD.

**REFERENCE(S)**

BASE MAP TAKEN FROM TEXAS DEPARTMENT OF TRANSPORTATION, COUNTY MAPBOOK 2012, PAGES 415, 416, 445, & 446; DELIVERED IN PDF <http://www.dot.state.tx.us>

**ISSUED FOR PERMITTING PURPOSES ONLY**



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	MGC	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

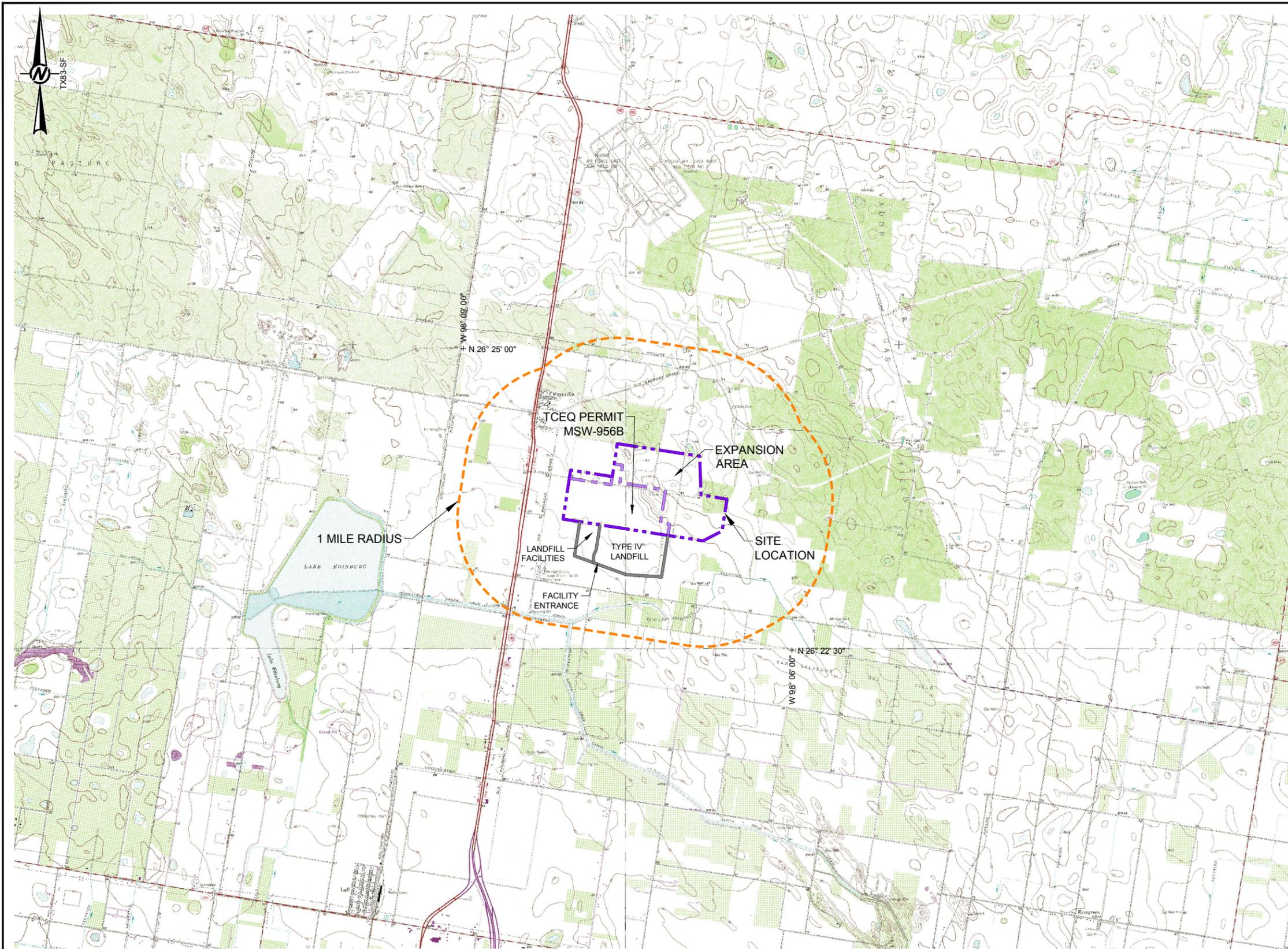
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**TxDOT COUNTY MAP**

PROJECT NO.	APPLICATION SECTION	REV.	2 of 5	FIGURE
1401491	I	1		I-2

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



USGS LEGEND	
<b>BUILDINGS AND RELATED FEATURES</b>	<b>RIVERS, LAKES, AND CANALS</b>
Building	Perennial stream
School; house of worship	Perennial river
Athletic field	Intermittent stream
Built-up area	Intermittent river
Forest headquarters*	Perennial lake/pond
Ranger district office*	Intermittent lake/pond
Guard station or work center*	Dry lake/pond
Racetrack or raceway	Narrow wash
Airport, paved landing strip, runway, taxiway, or apron	Wide wash
Unpaved landing strip	Canal, flume, or aqueduct with lock
Well (other than water), windmill or wind generator	Elevated aqueduct, flume, or conduit
Tanks	<b>MINES AND CAVES</b>
Covered reservoir	Quarry or open pit mine
Gaging station	Gravel, sand, clay, or borrow pit
Located or landmark object (feature as labeled)	<b>CONTROL DATA AND MONUMENTS</b>
Boat ramp or boat access*	Principal point**
Roadside park or rest area	Located or landmark object (feature as labeled)
Picnic area	U.S. mineral or location monument
Campground	River mileage marker
<b>ROADS AND RELATED FEATURES</b>	<b>Boundary monument</b>
Please note: Roads on Provisional-edition maps are not classified as primary, secondary, or light duty. These roads are all classified as improved roads and are symbolized the same as light duty roads.	
Primary highway	Third-order or better elevation, with tablet
Secondary highway	Third-order or better elevation, recoverable mark, no tablet
Light duty road, paved*	With number and elevation
Light duty road, gravel*	<b>Horizontal control</b>
Light duty road, dirt*	Third-order or better, permanent mark
Light duty road, unspecified*	With third-order or better elevation
Unimproved road	With checked spot elevation
Unimproved road*	Coincident with found section corner
4WD road	Unmonumented**
4WD road*	<b>PROJECTION AND GRIDS</b>
Trail	Neatline
Highway or road with median strip	Graticule tick
Highway or road under construction	Graticule intersection
Highway or road bridge; drawbridge	Datum shift tick
Highway or road tunnel	<b>State plane coordinate systems</b>
Road block, berm, or barrier*	Primary zone tick
Gate on road*	Secondary zone tick
<b>CONTOURS</b>	Tertiary zone tick
<b>Topographic</b>	Quaternary zone tick
Index	Quinary zone tick
Approximate or indefinite	<b>Universal transverse mercator grid</b>
Intermediate	UTM grid (full grid)
Approximate or indefinite	UTM grid ticks*
Supplementary	
Depression	

LEGEND	
	EXPANSION PERMIT BOUNDARY
	PERMIT BOUNDARY TCEQ PERMIT MSW-956B

- NOTE(S)**
- NO STORM WATER INTAKE OR DISCHARGE STRUCTURES.
  - REFER TO FIGURE I-6, FACILITY LAYOUT PLAN FOR STRUCTURES ASSOCIATED WITH THE FACILITY'S DISPOSAL ACTIVITIES INCLUDING AN OUTLINE OF THE SOLID WASTE MANAGEMENT UNITS, INTERIOR ROADS, AND SURFACE WATER DRAINAGE FEATURES AS WELL AS ENTRANCE FACILITY STRUCTURES INCLUDING OFFICE, MAINTENANCE BUILDINGS, GATEHOUSE AND SCALES, AND ENTRANCE ROAD.

**REFERENCE(S)**  
 BASE MAP INITIALLY DEVELOPED BY THE UNITED STATES GEOLOGICAL SURVEY (USGS) AND ENHANCED BY TEXAS NATURAL RESOURCE INFORMATION SYSTEM (TNRIS) USING CONTENT LAST UPDATED BY USGS IN 1996 FOR LA BLONCA, TX, AND 1995 FOR EDINBURG, HARGILL, AND FAYSVILLE.

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0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI



CLIENT  
 CITY OF EDINBURG SOLID WASTE MANAGEMENT

CONSULTANT  
 Golder Associates

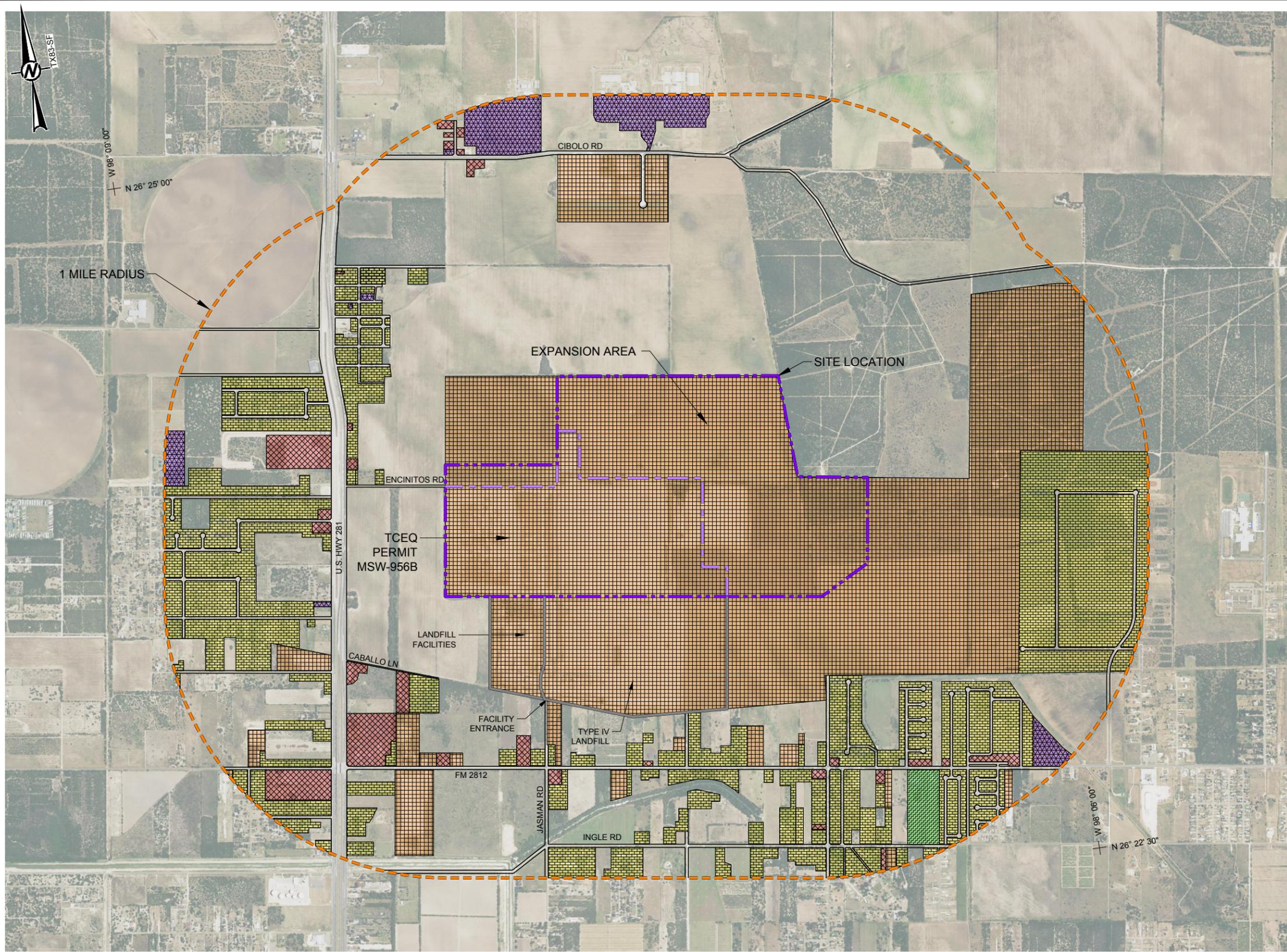
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PROJECT  
 EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**USGS TOPOGRAPHIC MAP**

PROJECT NO.	APPLICATION SECTION	REV.	3 of 5	FIGURE
1401491	I	1		I-3

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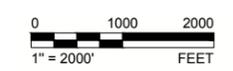
**LEGEND**

- EXPANSION PERMIT BOUNDARY
- TCEQ PERMIT MSW-956B PERMIT BOUNDARY
- 1 MILE RADIUS
- COMMERCIAL
- INDUSTRIAL
- RESIDENTIAL
- RECREATIONAL
- INSTITUTIONAL
- AGRICULTURAL / PASTURELAND / OPEN

- NOTE(S)**
1. NO STORM WATER INTAKE OR DISCHARGE STRUCTURES.
  2. REFER TO FIGURE I-6, FACILITY LAYOUT PLAN FOR STRUCTURES ASSOCIATED WITH THE FACILITY'S DISPOSAL ACTIVITIES INCLUDING AN OUTLINE OF THE SOLID WASTE MANAGEMENT UNITS, INTERIOR ROADS, AND SURFACE WATER DRAINAGE FEATURES AS WELL AS ENTRANCE FACILITY STRUCTURES INCLUDING OFFICE, MAINTENANCE BUILDINGS, GATEHOUSE AND SCALES, AND ENTRANCE ROAD.
  3. LAND USE PRESENTED IS ACTUAL LAND USE BASED ON FIELD INVENTORIES PERFORMED ON OCTOBER 2016 AND REVIEW OF GOOGLE EARTH IMAGERY AND NOT PLANNED LAND USE AS DEPICTED ON FIGURE II-5, ZONING MAP.

**REFERENCE(S)**  
 BASE MAP TAKEN FROM NATIONAL AGRICULTURE IMAGERY PROGRAM (NAIP) DIGITAL ORTHO PHOTO IMAGE PUBLISHED BY USDA-FSA-APFO DATED DECEMBER 16, 2014

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 SOLID WASTE MANAGEMENT

CONSULTANT

Golder Associates

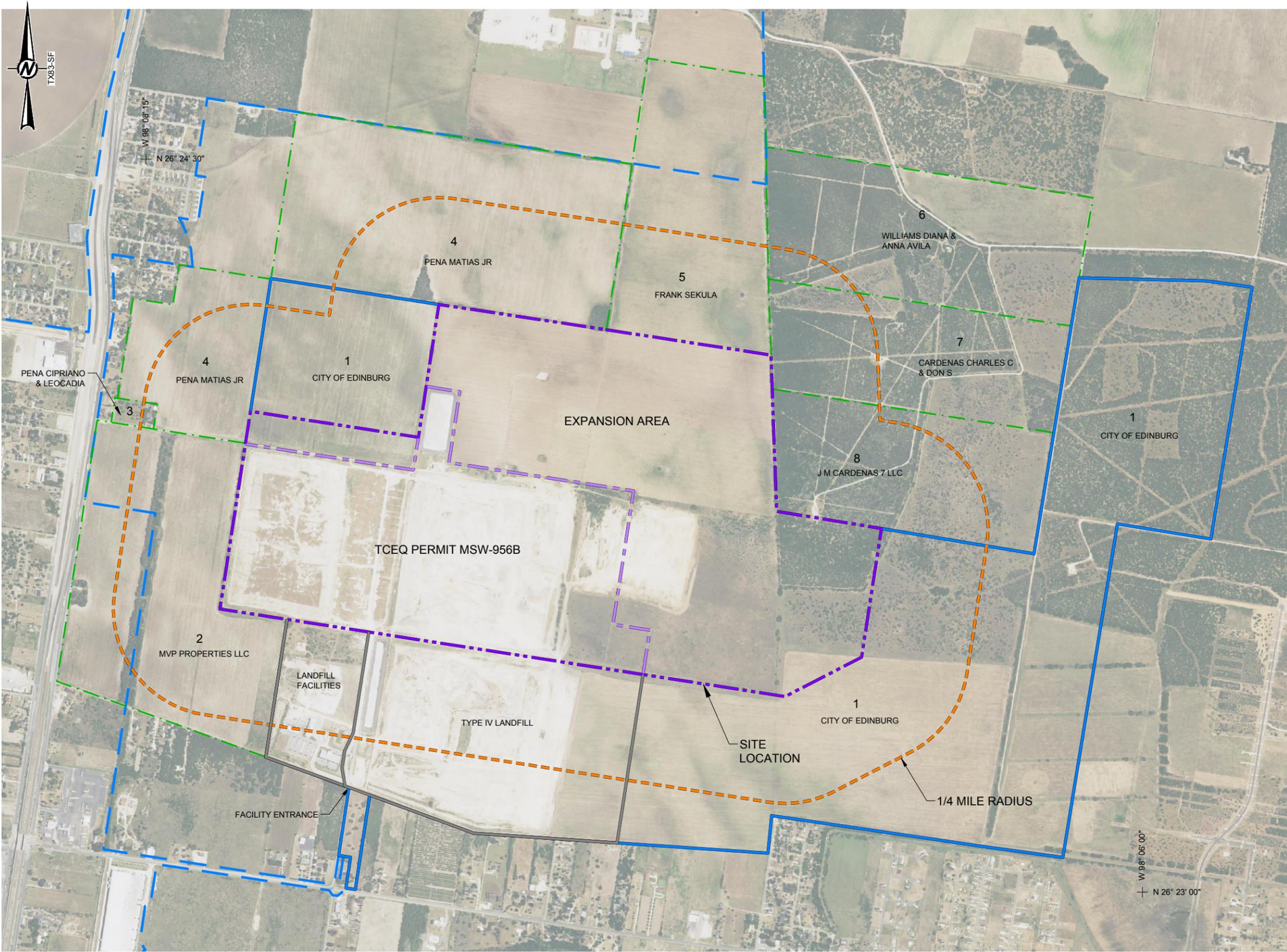
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PROJECT  
 EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**LAND USE MAP**

PROJECT NO. 1401491	APPLICATION SECTION I	REV. 1	4 of 5	FIGURE I-4
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**LEGEND**

- - - EXPANSION PERMIT BOUNDARY
- - - TCEQ PERMIT MSW-956B PERMIT BOUNDARY
- - - 1/4 MILE RADIUS
- - - PROPERTY OWNED BY THE CITY OF EDINBURG INCLUDED IN CITY LIMITS
- - - CITY LIMITS
- - - ADJACENT PROPERTY OWNER

- NOTE(S)**
- NO MINERAL INTEREST OWNERSHIP UNDER THE FACILITY OR FACILITY EASEMENT HOLDERS LISTED IN HIDALGO COUNTY APPRAISAL DISTRICT RECORDS ON DATE OF THIS APPLICATION. <http://hidalgoad.org/index.html>
  - NO STORM WATER INTAKE OR DISCHARGE STRUCTURES.
  - REFER TO FIGURE I-6, FACILITY LAYOUT PLAN FOR STRUCTURES ASSOCIATED WITH THE FACILITY'S DISPOSAL ACTIVITIES INCLUDING AN OUTLINE OF THE SOLID WASTE MANAGEMENT UNITS, INTERIOR ROADS, AND SURFACE WATER DRAINAGE FEATURES AS WELL AS ENTRANCE FACILITY STRUCTURES INCLUDING OFFICE, MAINTENANCE BUILDINGS, GATEHOUSE AND SCALES, AND ENTRANCE ROAD.
  - PROPERTY OWNED BY THE CITY OF EDINBURG ON THIS FIGURE IS WITHIN THE JURISDICTIONAL CITY LIMITS OF THE CITY OF EDINBURG.
  - THE CITY OF EDINBURG IS THE OWNER OF ALL OF THE LANDS LOCATED WITHIN THE PERMIT BOUNDARY.

MAP ID	ADJACENT PROPERTY OWNER	HCAD PROPERTY ID
1	CITY OF EDINBURG PO BOX 1079 EDINBURG, TX 78540-1079	137144 137157 598277 847730 137145 158365 599131 883423 137147 158366 641113 902278 137155 287793 791134 137156 598269 796521 137158 629272
2	MVP PROPERTIES LLC 3101 N JACKSON RD MCALLEN, TX 78501-1446	683483 901367
3	PENA CIPRIANO & LEOCADIA 137 ENCINITOS RD EDINBURG, TX 78542-8215	170443 170442
4	PENA MATIAS JR 13303 N EXPRESSWAY 281 EDINBURG, TX 78542-6459	137149 137154 120161
5	SEKULA FRANK 26151 N FM 681 EDINBURG, TX 78541-6124	287791
6	WILLIAMS DIANA & ANNA AVILA ROBERT DE LA GARZA 400 BENDITO WAY MARBLE FALLS, TX 78654-6268	158362
7	CARDENAS CHARLES C & DON S 2019 S MCCOLL RD STE A4 EDINBURG, TX 78539	158363
8	J M CARDENAS 7 LLC 3211 SAGE HILL ST SAN ANTONIO, TX 78230-4922	158364

- REFERENCE(S)**
- BASE MAP TAKEN FROM NATIONAL AGRICULTURE IMAGERY PROGRAM (NAIP) DIGITAL ORTHO PHOTO IMAGE PUBLISHED BY USDA-FSA-APFO DATED DECEMBER 16, 2014.
  - PROPERTY OWNERS INFORMATION TAKEN FROM HIDALGO COUNTY APPRAISAL DISTRICT, HCAD DATED 12/13/16, DELIVERED FROM <http://www.hidalgoad.org/index.html>

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0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

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HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
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[+1] (281) 821-6868  
[www.golder.com](http://www.golder.com)

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**LAND OWNERSHIP MAP**

PROJECT NO. 1401491	APPLICATION SECTION I	REV. 1	5 of 5	FIGURE I-5
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**APPENDIX IA1**

**OWNERSHIP RECORDS**

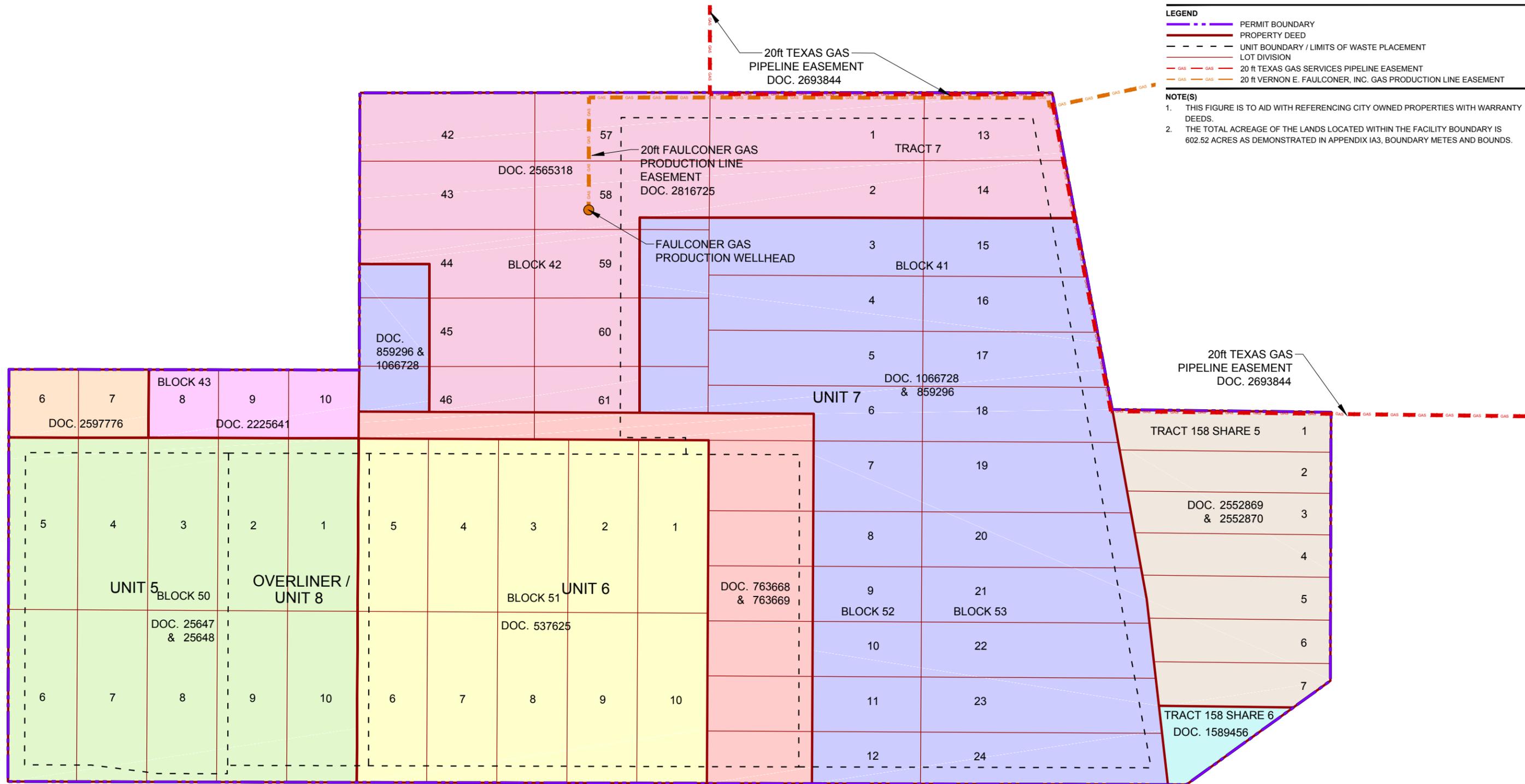


**LEGEND**

- PERMIT BOUNDARY
- PROPERTY DEED
- UNIT BOUNDARY / LIMITS OF WASTE PLACEMENT
- LOT DIVISION
- 20 ft TEXAS GAS SERVICES PIPELINE EASEMENT
- 20 ft VERNON E. FAULCONER, INC. GAS PRODUCTION LINE EASEMENT

**NOTE(S)**

1. THIS FIGURE IS TO AID WITH REFERENCING CITY OWNED PROPERTIES WITH WARRANTY DEEDS.
2. THE TOTAL ACREAGE OF THE LANDS LOCATED WITHIN THE FACILITY BOUNDARY IS 602.52 ACRES AS DEMONSTRATED IN APPENDIX IA3, BOUNDARY METES AND BOUNDS.



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SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

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CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
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PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

---

TITLE

**LAND OWNERSHIP RECORD MAP**

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PROJECT NO. 1401491	APPLICATION SECTION IA1	REV. 1	1 of 1	FIGURE IA-1
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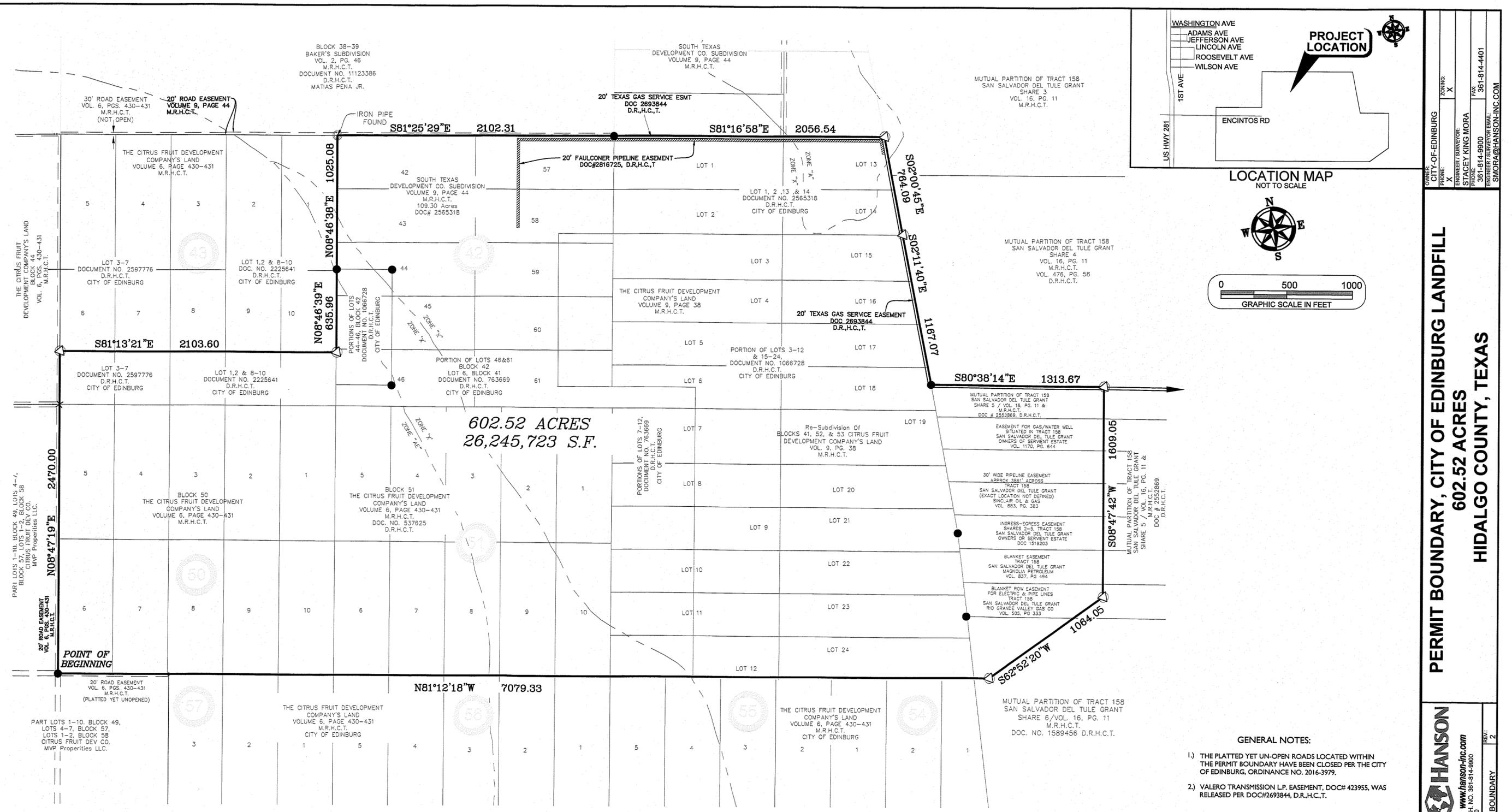
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**APPENDIX IA3**

**PERMIT BOUNDARY METES AND BOUNDS LEGAL DESCRIPTION**

**APPENDIX IA4**

**PERMIT BOUNDARY METES AND BOUNDS EXHIBIT**



I, Stacey King Mora, Registered Professional Land Surveyor, hereby certify that this survey map was prepared from an actual on the ground survey made under my direction and supervision, and represents the facts found at the time of survey, and that this survey substantially complies with the current standards adopted by the Texas Board of Professional Land Surveying.

*Stacey King Mora*  
 Stacey King Mora  
 Registered Professional Land Surveyor  
 Texas Registration No. 6166



Naismith/Hanson Professional Services Inc.  
 Date: June 24, 2017

- CALCULATED CORNER
- IRON PIPE FOUND
- 5/8" IRON ROD FOUND
- COTTON SPINDLE FOUND

- GENERAL NOTES:**
- THE PLATTED YET UN-OPEN ROADS LOCATED WITHIN THE PERMIT BOUNDARY HAVE BEEN CLOSED PER THE CITY OF EDINBURG, ORDINANCE NO. 2016-3979.
  - VALERO TRANSMISSION LP. EASEMENT, DOC# 423955, WAS RELEASED PER DOC#2693844, D.R.H.C.T.
  - SINCLAIR OIL & GAS EASEMENT, DOC# 5798, VOLUME 886, PG 207 WAS RELEASED PER DOC#2824216, D.R.H.C.T.
  - ALL BEARINGS ARE GRID BEARING BASED ON THE TEXAS COORDINATE SYSTEM FOR THE LAMBERT SOUTH ZONE NAD 1983
  - SOME OBJECTS MAY BE DRAWN OUT OF SCALE FOR CLARITY.
  - A METES A BOUNDS DESCRIPTION DATED MARCH 4, 2016 TO ACCOMPANY THIS SURVEY.
  - PER FLOOD INSURANCE RATE MAP COMMUNITY-PANEL NUMBER 480334 0325 D, MAP REVISED JUNE 6, 2000, THE SUBJECT PROPERTY IS LOCATED PARTIALLY IN ZONES:
    - "A" AND "AE", DEFINED AS "SPECIAL FLOOD HAZARD AREAS INUNDATED BY 100-YEAR FLOOD";
    - "X" - OTHER FLOOD AREAS, DEFINED AS "AREAS OF 500-YEAR FLOOD; AREAS OF 100-YEAR FLOOD WITH AVERAGE DEPTHS OF LESS THAN 1 FOOT OR WITH DRAINAGE AREAS LESS THAN 1 SQUARE MILE; AND AREAS PROTECTED BY LEVEES FROM 100-YEAR FLOOD";
    - "X" - OTHER AREAS, DEFINED AS "AREAS DETERMINED TO BE OUTSIDE 500-YEAR FLOODPLAIN"
- THIS STATEMENT SHALL NOT CREATE LIABILITY ON THE PART OF THE SURVEYOR.

**PERMIT BOUNDARY, CITY OF EDINBURG LANDFILL**  
**602.52 ACRES**  
**HIDALGO COUNTY, TEXAS**

OWNER: CITY OF EDINBURG  
 PHONE: X  
 ZONING: X  
 ENGINEER/SURVEYOR: STACEY KING MORA  
 PH: 361-814-9900  
 FAX: 361-814-4401  
 ENGINEER/SURVEYOR EMAIL: SMORA@HANSON-INC.COM

**HANSON**  
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 4501 GOLLHAR RD., CORPUS CHRISTI, TEXAS 78411  
 TSP# FIRM #655  
 PROJECT NO.: 1703000000  
 SURVEY DATE: 06/23/2017  
 SHEET NO.: 2/23

DATE: 06/23/2017  
 TIME: 10:00 AM  
 CHECKED BY: SKM  
 DRAWN BY: SKM  
 CDD

SHEET 1 OF 1

**APPENDIX IA5**

**PROPERTY OWNER AFFIDAVIT**



**PROPERTY OWNER'S AFFIDAVIT**

I, Richard M. Hinojosa, as City Manager, as authorized signatory for City of Edinburg, acknowledge on behalf of City of Edinburg, the owner of record of the property herein described:

The permit boundary for TCEQ Permit MSW-956C, a 602.52 acre tract of land comprised of Lots 42-46 & 57-61, Block 42, South Texas Development Company Subdivision Hidalgo County, Texas, and Lots 1-24, Citrus Fruit Development Company's Land, Hidalgo County, Texas, Lots 1-10, Block 51, Lots 1-10, Block 50, and a portion of Lots 6-10, Block 43, all being of the Citrus Fruit Development Company's Land, Share 5 & 6, of the Mutual Partition of Tract 158, San Salvador Del Tule Grant, , Hidalgo County, Texas."

I acknowledge that City of Edinburg is applying for authorization to horizontally and vertically expand the existing municipal solid waste landfill facility under permit amendment application TCEQ Permit MSW-956C upon such property.

I acknowledge on behalf of City of Edinburg, that the State of Texas may hold the City of Edinburg either jointly or severally responsible for the operation, maintenance, closure, and ay required post-closure care of the site and facility.

I acknowledge on behalf of City of Edinburg, that it has responsibility to file with the deed records of Hidalgo County, an affidavit to the public advising that the Site has been used for a solid waste facility, prior to the time the Site begins operating as a municipal solid waste landfill facility, and to file a final recording upon completion of disposal operations and closure of the landfill units at the municipal solid waste facility in accordance with 30 TAC §330.19.

I acknowledge on behalf of City of Edinburg, the requirement that owner or operator of the Site and the State of Texas shall have access to the property described herein during the active life and post-closure care of the municipal solid waste facility for the purpose of inspection and maintenances.

WITNESS MY HAND on this 10<sup>th</sup> day of October, 2017.

Richard M. Hinojosa  
Richard M. Hinojosa, City Manager

SWORN TO AND SUBSCRIBED before me on this 10<sup>th</sup> day of October, 2017.

Martha Jenkins, For Hidalgo County, Texas

Notary Public

My Commission Expires: 7/15/18





PERMIT AMENDMENT APPLICATION  
Part II

# WASTE ACCEPTANCE PLAN, EXISTING CONDITIONS SUMMARY, AND FACILITY LAYOUT

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

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78541 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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 Registration Number F-2578

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 PURPOSES ONLY

## 1.0 WASTE ACCEPTANCE PLAN

No changes to the types of waste accepted at the Edinburg Regional Disposal Facility are proposed in this permit amendment application.

### 1.1 Properties and Characteristics of Waste

30 TAC §330.61(b)(1)

**Table II-1: Major Classifications of Solid Waste to be Accepted**

Major Classification	Characteristics and Sources
Garbage	Putrescible animal and vegetable waste materials resulting from the handling, preparation, cooking, and consumption of food, including waste materials from markets, storage facilities, handling, and sale of produce and other food products.
Rubbish / Trash	Non-putrescible solid waste (excluding ashes), consisting of both combustible and noncombustible waste materials. Combustible rubbish includes paper, rags, cartons, wood, excelsior, furniture, rubber, plastics, brush, or similar materials; noncombustible rubbish includes glass, crockery, tin cans, aluminum cans, and similar materials.
Brush	Cuttings or trimmings from trees, shrubs, or lawns and similar materials.
Construction and Demolition	Waste resulting from construction or demolition projects; includes all materials that are directly or indirectly the by-products of construction work or that result from demolition of buildings and other structures, including, but not limited to, paper, cartons, gypsum board, wood, excelsior, rubber, and plastics.
Class 2 non-hazardous industrial	Any individual solid waste or combination of industrial solid waste that are not described as Hazardous, Class 1, or Class 3.
Class 3 non-hazardous industrial	Inert and essentially insoluble industrial solid waste, usually including, but not limited to, materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc., that are not readily decomposable.
Regulated asbestos-containing material (RACM) <sup>1</sup>	Friable asbestos material, Category I non-friable asbestos-containing material that has become friable; Category I non-friable asbestos-containing material that will be or has been subjected to sanding, grinding, cutting, or abrading; or Category II non-friable asbestos-containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.
Special Waste <sup>2</sup> (subject to provisions of 30 TAC §330.171)	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.
White Goods <sup>3</sup>	Discarded large household appliances such as refrigerators, stoves, washing machines, or dishwashers

1. Refer to Part IVG, Regulated Asbestos Containing Material Handling Plan
2. Refer to Part IVH, Special Waste Acceptance Plan
3. Must not contain chlorinated fluorocarbon (CFC)

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):

- Lead acid storage battery.
- Do-it-yourself used motor vehicle oil, either by itself or mixed with other solid waste.
- Used oil filters from internal combustion engines.
- Whole used or scrap tires unless processed prior to disposal in a manner acceptable to the TCEQ or otherwise approved by the TCEQ (e.g. variance)
- Refrigerators, freezers, air conditioners, and any other items containing chlorinated fluorocarbon (CFC) must be handled in accordance with 40 CFR §82.156(f). Such items will only be accepted at the site if the generator or transporter provides written certification that the CFC has been evacuated from the unit and that it was not knowingly allowed to escape into the atmosphere. The site operator will verify that the refrigerant has been evacuated from the appliance or shipment of appliances. Such verification must include a signed statement from the person from whom the appliance or shipment of appliances is obtained that all refrigerant that had not leaked previously has been recovered from the appliance or shipment of appliances in accordance with 40 CFR §82.156(g) or (h), as applicable. This statement must include the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered or a contract that refrigerant will be removed prior to delivery. The facility will notify persons who may deliver such items of the requirement to verify evacuation of refrigerant by signage or letter.
- Bulk or non-containerized liquid waste unless the waste is household waste other than septic waste.
- 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.
- 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.
- Polychlorinated biphenyls (PCB) wastes, as defined under 40 CFR Part 761.
- Radioactive materials
- Special waste not identified in Appendix IVH, Special Waste Acceptance Plan.
- Or other wastes prohibited by the TCEQ regulations

The facility has not in the past accepted, and will not accept, Class 1 industrial solid waste, with the exception of waste that has been designated Class 1 industrial waste only because of its asbestos content. There are no existing or proposed Class 1 cells or disposal areas at the facility; therefore, the facility is consistent with the provisions of 30 TAC §330.561.

## 1.2 Waste Parametric Limitations

30 TAC §330.61(b)(1)

Waste accepted at the facility will not have constituent concentrations or characteristics that will adversely impact or influence the design and operation of the facility. Special wastes accepted at the facility will meet the provisions of 30 TAC §330.171 and criteria outlined in Part IVH, Special Waste Acceptance Plan, including the waste management procedures set forth in Part IV, Appendix H-1, Waste Specific Special Waste Management Procedures.

## 1.3 Waste Source Generation

30 TAC §330.61(b)(1)(A)

The facility serves individuals, businesses, and communities in the Lower Rio Grande Valley, including the City of Edinburg and Hidalgo, Starr, Books, Kennedy, Willacy, and Cameron Counties. According to the Regional Solid Waste Management Plan Amendment developed by the Lower Rio Grande Valley Development Council, the waste types and percentage by weight are as follows.

**Table II-2: Lower Rio Grande Valley Waste Characteristics**

Types of Waste	Percentage	Description
Residential	40.73%	Durable goods - appliances and furniture Non-durable goods - papers, disposable diapers, clothing & footwear Containers and packaging Food wastes and yard wastes
Commercial	14.15%	Commercial waste - cardboard, office papers, food, disposable dinnerware, and other waste products. Disaster waste is included in this category.
Contaminated Soil	12.9%	Generated during remediation of spill sites, often in conjunction with removal of underground storage tanks.
Class II & Class III	10.8%	Waste imported from Mexico - A sub-category of industrial waste
C & D Waste	7.6%	Wastes resulting from construction and demolition processes
Brush	5.9%	Trees, shrubs and other yard waste debris
Institutional	3.93%	Institutional waste (schools, nursing homes and hospitals) generally considered the same as commercial waste.
Recreational	2.95%	Waste generated at parks and other recreational facilities.
Sludge	0.6%	Sludge from water and wastewater treatment plants and also septage (pumped from septic tanks) and grease and grit trap waste.
Class I Asbestos	0.44%	Asbestos generated during construction demolition or removal of asbestos from existing buildings and readily releases airborne particles.
Litter/Dumping	.006%	Waste generated by promiscuous dumping along road ways and other areas
Asbestos	.06%	Asbestos generated construction demolition or removal of asbestos from existing buildings and does not readily release airborne particles.

Types of Waste	Percentage	Description
Other	.007%	Waste not identified in the categories above

The population equivalent as defined by 30 TAC §330.3 is “the hypothetical population that would generate an amount of solid waste equivalent to that actually being managed based on a generation rate of five pounds per capita per day and applied to situations involving solid waste not necessarily generated by individuals.” The facility received approximately 494,319 tons of waste during the fiscal year according to the FY 2016 MSW Annual Report; therefore, the current population equivalent is approximately 542,000.

The facility does not have a waste recovery requirement but does regularly evaluate market feasibility for material reuse. Brush is mulched for beneficial use such as for side slope erosion control.

### 1.4 Waste Acceptance Rate

30 TAC §330.61(b)(1)(C)

Based on the FY 2016 MSW Annual Report, the facility received approximately 494,319 tons of waste during the fiscal year. According to the TCEQ – Municipal Solid Waste in Texas: A Year in Review 2003-2015, the greatest annual population increase was 4.4% in year 2004. Assuming a 4.4% annual increase, the estimated maximum annual waste acceptance rate for the facility projected for five years is as follows:

**Table II-3: Estimated Maximum Annual Waste Acceptance Rates**

Year	Estimated Maximum Annual Waste Acceptance Rate (tons per year)
2017	516,069
2018	538,776
2019	562,482
2020	587,231
2021	613,070

The landfill expansion will result in a permit boundary of 602.5 acres and a waste disposal area of 406.0 acres. The total disposal capacity of the expansion will be 87,301,156 cubic yards, and the remaining disposal capacity will be 76,304,934 cubic yards of waste and daily cover, based on the FY 2016 MSW Annual Report. It is projected that the maximum rate of waste disposal will reach approximately 1,500,000 tons per year and that the facility will have a site life of approximately 63.5 years. The total disposal capacity and operational life calculations are provided in Part III3A, Volume and Site Life Calculations.

As population, economic conditions, and available landfill disposal capacity change within the region, the volume of incoming waste could vary considerably. The facility will maintain quarterly records to document waste acceptance rates. If the rate exceeds the estimated rate and is not due to a temporary occurrence,

the City will file a permit modification application consistent with 30 TAC §330.125(h). As provided by rule, the estimated waste acceptance rate is not a limiting parameter of the permit.

## 2.0 EXISTING CONDITIONS SUMMARY

The Edinburg Sanitary Landfill is an active, 253.5-acre Type I municipal solid waste (MSW) facility owned and operated by the City of Edinburg, Texas (City) under TCEQ Permit MSW-956B. The lateral and vertical expansion amendment is for a 602.5-acre MSW facility. The Edinburg Regional Disposal Facility, TCEQ Permit MSW-956C, is located approximately 1,900 feet east of U.S. Hwy 281 and 3,200 feet north of FM 2812 in Edinburg, Hidalgo County, Texas as shown on Figure II-1, General Location Map.

### 2.1 General Location Maps

30 TAC §330.61(c)

The following general location maps are provided in this document. These general location maps are provided in addition to those maps provided in Part I, Facility and Applicant Information and Supplementary Technical Report. Collectively, these maps accurately show the proximity of the facility to surrounding features.

**Table II-4: General Location Maps**

Figure	Title	Citation
II-1	General Location Map	30 TAC §330.61(c)(6),(7),(8),&(9)
II-2	General Topographic Map	30 TAC §330.61(c)(6),(7),&(9) & §330.61(e)
II-3	Aerial Photograph	30 TAC §330.61(c)(6),(7),&(9) & §330.61(f)(1)
II-4	Land Use Map	30 TAC §330.61(c)(4),(6),(7),&(9) & 330.61(g) & 330.61(h)(2)
II-5	Zoning Map	30 TAC §330.61(c)(6)&(9) & 330.61(h)(1)
II-6	Drainage, Pipeline, and Utility Easement Location Map	30 TAC §330.61(c)(6),(9),&(10)
II-7	Growth Trend Aerial Photograph Series	30 TAC §330.61(c)(6),(7),&(9) & §330.61(f)(2)
II-8	Water Well and Oil & Gas Well Location Map	30 TAC §330.61(c)(2),(6),(7),&(9)
II-9	Structures Location Map	30 TAC §330.61(c)(3),(6),&(9)
II-10	Wind Rose	30 TAC §330.61(c)(1)
II-11	Traffic Volumes	30 TAC §330.61(c)(5),(6),(9),&(11)

Note: 30 TAC §330.61(c)

- (1) Prevailing wind direction
- (2) Known water wells within 500 feet
- (3) Structures and inhabitable buildings within 500 feet
- (4) Schools, licensed daycare facilities, churches, hospitals, cemeteries, ponds, lakes, and residential, commercial, and recreational areas within 1 mile
- (5) Location and surface type of roads within 1 mile
- (6) Latitudes and longitudes
- (7) Area streams
- (8) Airports within 6 miles
- (9) Permit boundary

- (10) Drainage, pipeline, and utility easements
- (11) Facility access control features
- (12) Archaeological site and historical sites (None found within a 1-mile radius of facility)

### **2.1.1 General Topographic Map**

30 TAC §330.61(e)

Figure II-2, General Topographic Map depicts the permit boundary with a base map taken the United States Geological Survey (USGS) 7-1/2-minute quadrangle sheets and enhanced by Texas Natural Resource Information System (TNRIS) using content last updated by USDS in 1996 for La Blanca, TX, and 1995 for Edinburg, Hargill, and Faysville, TX delivered in a digital raster graphic (DRG) a scale of 1 inch equals 2,000 feet.

### **2.1.2 Aerial Photograph**

30 TAC §330.61(f)(1)

Figure II-3, Aerial Photograph approximately 9 inches by 12 inches with a scale of 1 inch equals 2,000 feet shows the area within at least a 1-mile-radius of the site boundaries with a base map taken from National Agriculture Imagery Program (NAIP) digital ortho-photo image published by USDA-FSA-APFO dated December 16, 2014. The permit boundary and waste fill areas are marked on the aerial photograph.

## **2.2 Land Use Compatibility**

30 TAC §330.61(a)

§§2.2 – 2.11 of this report discuss site-specific conditions that potentially require special design considerations, as set forth in 30 TAC §330.61(a), including land use compatibility, land use characterization, transportation, geology and soils, groundwater and surface water, abandoned oil & gas and water wells, floodplains, wetlands, endangered or threatened species, and Texas Historical Commission (THC) review. As documented, there are no existing site-specific conditions that require special design considerations or possible mitigation of conditions under 30 TAC §330.61(h)–(o).

### **2.2.1 Impact on Surrounding Cities, Communities, Group of Property Owners, or Individuals**

30 TAC §330.61(h)

As documented, there are no existing site-specific conditions that may impact surrounding cities, communities, group of property owners, or individuals; nor concern that the use of land for a MSW facility will adversely impact human health or the environment.

## **2.2.2 Compatibility with Surrounding Land Use, Zoning, Community Growth Patterns**

30 TAC §330.61(h)

Sections 2.3 discusses site-specific land use characterization including surrounding land use, zoning in the vicinity, community growth patterns, and proximity to residents and other uses. As documented, the MSW facility is compatible with the surrounding area.

## **2.3 Land Use Characterization**

### **2.3.1 Land Use Map**

30 TAC §330.61(g)

Figure II-4, Land Use Map is a constructed map showing the facility boundary and land uses within 1 mile such as commercial, industrial, residential, recreational, institutional, and open areas used for agricultural, pastureland, or roadways. The map shows the location of approximately 972 residences, sixty commercial and industrial businesses, a school, a licensed daycare facility, four churches, a cemetery, and a recreational area within 1 mile of the facility boundary. There are no ponds or lakes, hospitals, or historic structures and sites within 1 mile of the facility boundary.

Any existing zoning on or surrounding the property is shown on Figure II-5, Zoning Map and any drainage, pipeline, and utility easements within the facility are shown on Figure II-6, Drainage, Pipeline, and Utility Easement Location Map. Access roads serving the facility are shown on the Figure II-4, Land Use Map and Figure II-11, Traffic Volumes.

### **2.3.2 Zoning Map**

30 TAC §330.61(h)(1)

Figure II-5, Zoning Map shows the City's Official Zoning Map dated June 16, 2015 within 2 miles of the facility as well as property recently annexed by the City. The facility is located with the City of Edinburg limits zoned for industrial land use.

### **2.3.3 Drainage, Pipeline, and Utility Easement Location Map**

30 TAC §330.61(c)(10)

Figure II-6, Drainage, Pipeline, and Utility Easement Location Map shows two deed recorded dedicated pipeline easements within and adjacent to the facility property. Deed records for both pipeline easements are located in Appendix IA, Legal Description. One 20-foot wide pipeline easement, owned by Texas Gas Services, runs adjacent to the eastern and northern facility property boundary. Another 20-foot wide pipeline easement, owned by Vernon E. Faulconer, Inc. (VEFI), runs adjacent to the Texas Gas Services pipeline

along northern property boundary and continues south to the gas production well located approximately 675 feet from the north property boundary as shown on Figure II-6.

Electrical powerlines owned by Magic Valley Electric Cooperative currently run from the intersection of Encinitos Road and the west property boundary a distance of approximately 2,000 feet south along the west permit boundary and extend approximately 5,000 feet east. Another electrical powerline owned by American Electric Power is located adjacent to the entrance road into the facility. Both powerlines are not constructed on dedicated easements and may be relocated if necessary for future site development.

A City owned sanitary sewer line currently runs from the intersection of Encinitos Road and the west property boundary and extends approximately 1,900 feet east. Another City owned sanitary sewer line is located adjacent to the entrance road into the facility. Neither sewer line is constructed on dedicated easements and may be relocated if necessary for future site development.

No drainage easements are located within the facility.

### **2.3.4 Character of Surrounding Land Use**

30 TAC §330.61(h)(2)

Information about the character of surrounding land uses within 1 mile of the facility is depicted on Figure II-4, Land Use Map. Portions of land are developed with a wide variety uses such as commercial, industrial, residential, recreational, institutional, and open areas used for agricultural, pastureland, or roadways. A breakdown of land use type and corresponding areas is summarized in Table II-5, Land Use within One Mile.

**Table II-5: Land Use within One Mile**

<b>Land Use</b>	<b>Area in Acres</b>	<b>Percentage of Total Area</b>
Open	2,773	52.4%
Industrial	1,554	29.3%
Residential	779	14.7%
Commercial	86	1.6%
Institutional	83	1.6%
Recreational	19	0.4%
<b>Total</b>	<b>5,294</b>	<b>100.0%</b>

### **2.3.5 Growth Trends**

30 TAC §330.61(h)(3)

Information about growth trends within 5 miles of the facility with directions of major development is evaluated by area population projections, inspection of a series of aerial photographs, and local planning studies.

#### **2.3.5.1 Population Projections**

Population projection data is provided by Texas State Data Center (TSDC) Office of the State Demographer county level population projections. Such projections are based on recent and projected demographic trends, including the birth rates, survival rates, and net migration rates of population groups defined by age, gender and ethnicity. The TSDC strongly recommends use of their half migration scenario for long-term planning. Population projections for the facility's current market areas are presented in Table II-6, Population Projections and Annual Growth Rates by County. The average annual growth rate for Hidalgo County is 1.75 percent.

**Table II-6: Population Projections and Annual Growth Rates by County**

Year	Hidalgo		Cameron		Willacy		Starr		Brooks	
2010	774,769		406,220		22,134		60,968		7,223	
2011	790,719	2.06%	413,216	1.72%	22,489	1.60%	61,948	1.61%	7,288	0.90%
2012	807,069	2.07%	420,341	1.72%	22,835	1.54%	62,935	1.59%	7,360	0.99%
2013	823,594	2.05%	427,512	1.71%	23,189	1.55%	63,974	1.65%	7,421	0.83%
2014	840,459	2.05%	434,651	1.67%	23,550	1.56%	64,984	1.58%	7,473	0.70%
2015	857,513	2.03%	442,043	1.70%	23,919	1.57%	66,002	1.57%	7,521	0.64%
2016	875,041	2.04%	449,385	1.66%	24,281	1.51%	67,032	1.56%	7,578	0.76%
2017	892,943	2.05%	456,745	1.64%	24,659	1.56%	68,070	1.55%	7,634	0.74%
2018	911,090	2.03%	464,372	1.67%	25,023	1.48%	69,120	1.54%	7,695	0.80%
2019	929,670	2.04%	471,949	1.63%	25,397	1.49%	70,150	1.49%	7,749	0.70%
2020	948,305	2.00%	479,754	1.65%	25,763	1.44%	71,198	1.49%	7,802	0.68%
2021	967,192	1.99%	487,619	1.64%	26,124	1.40%	72,218	1.43%	7,851	0.63%
2022	986,516	2.00%	495,617	1.64%	26,525	1.53%	73,255	1.44%	7,890	0.50%
2023	1,005,749	1.95%	503,683	1.63%	26,913	1.46%	74,309	1.44%	7,944	0.68%
2024	1,025,445	1.96%	511,744	1.60%	27,292	1.41%	75,319	1.36%	8,003	0.74%
2025	1,045,265	1.93%	519,892	1.59%	27,686	1.44%	76,313	1.32%	8,055	0.65%
2026	1,065,196	1.91%	528,188	1.60%	28,061	1.35%	77,275	1.26%	8,101	0.57%
2027	1,085,201	1.88%	536,214	1.52%	28,459	1.42%	78,253	1.27%	8,148	0.58%
2028	1,105,449	1.87%	544,417	1.53%	28,840	1.34%	79,213	1.23%	8,183	0.43%
2029	1,125,509	1.81%	552,460	1.48%	29,208	1.28%	80,124	1.15%	8,231	0.59%
2030	1,145,413	1.77%	560,637	1.48%	29,591	1.31%	81,023	1.12%	8,288	0.69%
2031	1,165,534	1.76%	568,577	1.42%	29,963	1.26%	81,913	1.10%	8,345	0.69%
2032	1,185,593	1.72%	576,698	1.43%	30,331	1.23%	82,801	1.08%	8,394	0.59%
2033	1,205,593	1.69%	584,801	1.41%	30,701	1.22%	83,706	1.09%	8,438	0.52%
2034	1,225,405	1.64%	592,893	1.38%	31,079	1.23%	84,585	1.05%	8,480	0.50%
2035	1,245,506	1.64%	600,956	1.36%	31,465	1.24%	85,462	1.04%	8,528	0.57%
2036	1,265,504	1.61%	609,040	1.35%	31,847	1.21%	86,374	1.07%	8,579	0.60%
2037	1,285,560	1.58%	617,258	1.35%	32,232	1.21%	87,268	1.04%	8,633	0.63%
2038	1,305,403	1.54%	625,479	1.33%	32,641	1.27%	88,171	1.03%	8,681	0.56%
2039	1,325,520	1.54%	633,617	1.30%	33,051	1.26%	89,070	1.02%	8,725	0.51%
2040	1,345,740	1.53%	641,946	1.31%	33,459	1.23%	89,949	0.99%	8,775	0.57%
2041	1,365,979	1.50%	650,215	1.29%	33,876	1.25%	90,848	1.00%	8,819	0.50%
2042	1,386,215	1.48%	658,619	1.29%	34,289	1.22%	91,770	1.01%	8,867	0.54%
2043	1,406,702	1.48%	667,056	1.28%	34,730	1.29%	92,689	1.00%	8,914	0.53%
2044	1,427,106	1.45%	675,597	1.28%	35,142	1.19%	93,606	0.99%	8,957	0.48%
2045	1,447,836	1.45%	684,275	1.28%	35,567	1.21%	94,514	0.97%	9,003	0.51%
2046	1,468,695	1.44%	692,910	1.26%	35,993	1.20%	95,408	0.95%	9,050	0.52%
2047	1,489,504	1.42%	701,729	1.27%	36,416	1.18%	96,294	0.93%	9,102	0.57%
2048	1,510,583	1.42%	710,603	1.26%	36,849	1.19%	97,194	0.93%	9,150	0.53%
2049	1,531,829	1.41%	719,501	1.25%	37,292	1.20%	98,072	0.90%	9,205	0.60%
2050	1,553,142	1.39%	728,518	1.25%	37,733	1.18%	98,953	0.90%	9,256	0.55%

### 2.3.5.2 Series of Aerial Photographs

§330.61(f)(2)

A series of National Agriculture Imagery Program (NAIP) digital aerial photographs for years 2006, 2008, 2010, 2012, and 2014 are presented in Figures I17A through I17E. An inspection of the series of digital aerial photographs revealed that relatively little development has occurred in the area of the facility over the past ten years in comparison to growth of the City of Edinburg in other areas. Most residential land use within the area is relatively unchanged with the exception of new single family home development east and southeast of the facility. A few commercial businesses have followed the new residential development along FM 2812 and a middle school was constructed approximately 1-1/2 miles east of the facility. West of the facility near the intersection of US Hwy 281 and FM 2812, a truck stop expanded and a produce distribution building was constructed.

### 2.3.5.3 Local Planning

The City of Edinburg developed a comprehensive plan, Edinburg Gateway Plan – An Agenda for 2025, providing integrated policy direction in the areas of land use and community character, growth and development, transportation, economic development, and utilities. According to the plan, most new residential development is occurring to the southwest and northwest of the City where commercial businesses closely follow. Downtown retail businesses have been replaced by government and professional offices and have relocated along the major transportation corridor US Hwy 281 for more market exposure.

Projected growth trends within a 5-mile radius of the facility reflect an increase in industrial activity on properties around the facility, an increase in commercial business along the US Hwy 281 corridor to the west, and an increase in residential and commercial development along FM 2812 to the east.

## **2.3.6 Proximity to Residents and Other Uses**

30 TAC §330.61(h)(4)

The proximity to residences and other uses (e.g., schools, churches, cemeteries, historic structures and sites, archaeologically significant sites, sites having exceptional aesthetic quality, etc.) within 1 mile of the facility, as well as an approximate number of residences and commercial establishments, including the distances and directions to the nearest residences and commercial establishments, are presented.

### 2.3.6.1 Schools

One school is located within 1 mile of the facility, Einedina B. Guerra Elementary, approximately 5,020 feet west at 10010 Via Fernandez.

#### 2.3.6.2 Licensed Day Care Facilities

One licensed day care facility is located within 1 mile of the facility, Mis Angelito's Day Care, approximately 3,530 feet south at 3324 E FM 2812.

#### 2.3.6.3 Churches

Four churches are located within 1 mile of the facility: Iglesia Metodista Unida Cristo Vencedor, Saint Theresa Catholic Church, Iglesia Bautista Emmanuel, and Iglesia Casa De Dios. The closet church, Iglesia Bautista Emmanuel is located approximately 2,480 feet west of the facility at 9413 N Expy 281.

#### 2.3.6.4 Hospitals

No hospitals are located within 1 mile of the facility.

#### 2.3.6.5 Cemeteries

One cemetery is located within 1 mile of the facility, Cibolo Cemetery, approximately 2,900 feet northeast on Cibolo Road.

#### 2.3.6.6 Historic Structures and Sites, Archeologically Significant Sites, and Sites having Exceptional Aesthetic Quality

No known historic structures and sites, archeologically significant sites, and sites having exceptional aesthetic quality are located within 1 mile of the facility.

#### 2.3.6.7 Recreational Areas

One recreational area is located within 1 mile of the facility, J. R. "Milo" Ponce Park, approximately 3,625 feet southeast at 3516 E FM 2812.

#### 2.3.6.8 Ponds and Lakes

No ponds and lakes are located within 1 mile of the facility.

#### 2.3.6.9 Residential

Based on field inventories performed in October 2016 and examination of Google Earth imagery, approximately 972 existing residences (including houses and mobile homes) are located within 1 mile of the facility. Established residential communities are located to the west and south and a new residential development is located approximately ½ mile east of the facility. The nearest existing residence is located approximately 1,230 feet west at 1307 Encinitos Rd.

#### 2.3.6.10 Commercial and Industrial

Based on field inventories performed in October 2016, examination of Google Earth imagery, and review of Hidalgo County Appraisal District records, approximately 60 businesses are located within 1 mile of the

facility representing a mix of both commercial and industrial activity. The nearest business, Dog Obedience Inc., is located approximately 1,590 feet southwest at 502 Caballo Ln.

### **2.3.7 Water Wells and Oil & Gas Wells**

30 TAC §330.61(h)(5)

Figure II-8, Water Well and Oil & Gas Well Location Map shows the location of water wells and oil & gas wells within 1 mile and 500 feet of the permit boundary.

#### **2.3.7.1 Water Wells**

30 TAC §330.61(c)(2)

No located water wells are located within 500 feet of the facility as shown on Figure II-8, Water Well and Oil & Gas Well Location Map.

Water well location information was provided by Texas Water Development Board's (TWDB) water data interactive viewer and by the Red Sands Groundwater Conservation District (RSGCD). The TWDB search identified six located water wells within a 1-mile-radius from the facility. Total depths of the wells range from 74 feet to 1,250 feet and are noted to be in the upper parts of the Evangeline aquifer. RSGCD provided approximate locations of an additional six water wells within a 1-mile-radius from the facility. The locations and records of these additional wells could not be verified. No water wells are located within the facility property.

#### **2.3.7.2 Oil & Gas Wells**

Three located plugged gas wells identified as OG-1, OG-4, and OG-15; and one dry hole identified as OG-3; and one production gas well identified as OG-1 are located on facility property and within 500 feet of the facility as shown on Figure II-8, Water Well and Oil & Gas Well Location Map. The gas production well identified as OG-1, owned by VEFI, located on the northern portion of the facility will remain active and will not interfere with landfill operations.

Oil & gas well location information was provided by the Texas Railroad Commission's (Texas RRC) public GIS viewer. The Texas RRC search identified 30 oil & gas wells within a 1-mile-radius from the site. Of those wells, two are production gas wells, six are dry holes, and 22 are plugged gas wells.

### **2.3.8 Structures**

30 TAC §330.61(c)(3)

All structures and inhabitable buildings within 500 feet of the facility are shown on Figure II-9, Structures Location Map. Edinburg Landfill Gas Treatment Facility (LFGTF) TCEQ Permit AIR-134429 is currently

located on the southern boundary of the facility west of the entrance road. The flare station located directly north of the LFGTF on facility property may be moved for future site development to a location within the LFGTF permit boundary. The unused container storage pad and storage building will be removed as operational development progresses.

### **2.3.9 Prevailing Wind Direction**

30 TAC §330.61(c)(1)

A wind rose is included as Figure II-10, Wind Rose to illustrate the prevailing wind direction for the Brownsville Airport located approximately 50 miles southeast for the period January 1, 1984 to December 31, 1992. The prevailing wind direction is from the south and southeast with a strength that can be greater than 21 knots. Calm winds are 5.23 percent of the time.

## **2.4 Transportation**

### **2.4.1 Traffic**

A traffic and location restrictions review and correspondence with Texas Department of Transportation (TxDOT) is included in Appendix IIA, Traffic.

#### **2.4.1.1 Access Road Availability and Adequacy**

30 TAC §330.61(i)(1)

##### **2.4.1.1.1 Access Road Availability**

The facility entrance is located at 8601 Jasman Road north of FM 2812 and is shared with the City's Type IV Landfill, TCEQ Permit MSW-2302. The access route from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Rd. An additional facility access route used only for landfill operations and maintenance vehicles as well as for emergency response vehicles from US Hwy 281 is eastbound Encinitos Rd. Figure II-11, Traffic Volume shows the access roads to facility.

##### **2.4.1.1.2 Access Road Adequacy**

Access road adequacy for US Hwy 281 and FM 2812, as provided by TxDOT, and a summary of their characteristics is presented in Table II-7, Access Road Characteristics. The portion of Jasman Rd located north of FM 2812 is owned, operated, and maintained by the City.

**Table II-7: Access Road Characteristics**

Access Road	Maximum Weight (Pounds)	Number of Lanes <sup>1</sup>	Width of Lanes (ft)	Curb/Shoulders <sup>2</sup>	Surface Type
US Hwy 281 <sup>3</sup>	80,000	4	12	5 to 10-ft shoulder	Asphaltic concrete Pavement surface overlaying a limed caliche base
FM 2812 <sup>4</sup>	80,000	2 <sup>4</sup>	12	~10-ft shoulder	Asphaltic concrete Pavement surface overlaying a limed caliche base

1. The number of lanes represent the total in both directions.
2. Curb and shoulder exist in both directions.
3. Near the intersection with FM 2812, US Hwy 281 northbound frontage road has three 12-foot wide lanes.
4. For a distance of approximately 500 foot on the eastern side of the intersection with US Hwy 281, FM 2812 has four 12-foot wide lanes.

#### 2.4.1.2 Volume of Vehicular Traffic

30 TAC §330.61(i)(2)

Volume of vehicular traffic on access roads within 1 mile of the proposed facility, both existing and future, during the expected life of the proposed facility is summarized in Table II-8, Volume of Vehicular Traffic and presented on Figure II-11, Traffic Volume. The expected life is estimated at 60 years with a 2 percent annual growth rate.

**Table II-8: Volume of Vehicular Traffic**

Access Road	Location	Existing Annual Average Daily Traffic	Future Annual Average Daily Traffic
US Hwy 281	North of FM 2812 intersection	18,954 VPD	667,605 VPD
US Hwy 281	South of FM 2812 intersection	32,674 VPD	1,150,856 VPD
FM 2812	West of Jasman Road intersection	9,610 VPD	58,286 VPD
FM 2812	East of Jasman Road intersection	8,420 VPD	51,069 VPD

#### 2.4.1.3 Facility Traffic Volume

30 TAC §330.61(i)(3)

Volume of vehicular traffic expected to be generated by the facility on access roads within 1 mile of the proposed facility summarized in Table II-9, Facility Traffic Volume and presented on Figure II-11, Traffic Volume. The expected life is estimated at 60 years with a 2 percent annual growth rate.

**Table II-9: Facility Traffic Volume**

Access Road	Location	Existing Annual Average Daily Traffic	Future Annual Average Daily Traffic
Jasman	Facility Entrance	187 VPD	763 VPD

#### 2.4.1.4 Coordination with TxDOT

30 TAC §§330.61(i)(4) & 330.23(a)

A traffic and location restrictions request for review was submitted to TxDOT presenting general location of access roads within a 1-mile-radius of the facility, access road availability and adequacy, existing and expected vehicular traffic volume, and expected traffic volume generated by the facility. TxDOT responded in general agreement with the amendment. Therefore, coordination of designs of proposed public roadway improvements, screening or special operating requirements, and solicitation of recommendations regarding access road adequacy and design capacity to safely accommodate additional traffic expected to be generated is not required.

#### **2.4.2 Airport Safety**

Documentation of coordination with the Federal Aviation Administration for compliance with airport location restrictions is included in Appendix IIB, Airport Safety.

##### 2.4.2.1 Airport Locations

Two airports are located within a 6-mile-radius of the facility as shown on Figure II-1, General Location Map. South Texas International Airport at Edinburg (FAA Identifier EBG) is located approximately 2.3 miles north of the facility and a privately owned airport, Norman and White Airport (FAA Identifier 6TE1) is located approximately 2.4 miles south of the facility.

##### 2.4.2.2 Airport Impact

30 TAC §330.61(i)(5)

The impact of the facility upon airports was analyzed and no bird hazards and no obstruction to navigable airspace were determined to exist.

##### 2.4.2.3 Coordination with Federal Aviation Administration

30 TAC §330.61(i)(5)

Notification of the proposed landfill expansion was submitted to the Federal Aviation Administration (FAA) including a description of the landfill expansion, location of facility and airports within a 6-mile-radius of facility, plan and profile views of the proposed landfill expansion condition and the imaginary surface for the South Texas International Airport at Edinburg, and a copy of the Brownsville Sectional Aeronautical Chart. A notice of proposed construction or alteration was filed with the Air Traffic Division and the FAA responded that an aeronautical study was conducted and issued a determination of no hazard to air navigation.

#### 2.4.2.4    No Bird Hazards

30 TAC §§330.545(a) & 330.545(c)

The facility is located greater than 10,000 feet from the South Texas International Airport at Edinburg's runway end used by turbojet aircraft and greater than 5,000 feet from the Norman and White Airport's runway end used by piston-type aircraft. The facility is not located in an area where the attraction of birds can cause a significant bird hazard to low-flying aircraft, and the facility has been designed and will be operated so that the municipal solid waste landfill units do not pose a bird hazard to aircraft.

#### 2.4.2.5    Notice to Airports and FAA

30 TAC §330.545(b)

In addition to the FAA, notification of the proposed landfill expansion was submitted to the South Texas International Airport at Edinburg and Norman and White Airport.

### **2.5    General Geology and Soils Statement**

30 TAC §330.61(j)(1)-(4)

Detailed discussion of the site geology is included in Part III4, Geology Report.

#### **2.5.1    Geology and Soils**

30 TAC §330.61(j)(1)

##### 2.5.1.1    Geology

In the Lower Rio Grande Valley (LRGV) the depositional stratigraphy described as the Gulf Coast Aquifer (GCA) are Quaternary and Neogene period sediments consisting primarily of fine to medium-grained materials deposited by fluvial and eolian processes. The outcrop of each progressively older, underlying unit is found to the west of the younger, overlying unit. Because of continental shelf differential subsidence, units typically thicken and dip toward the coastline of the Gulf of Mexico.

Figure II-12, Geologic Map presents the McAllen-Brownsville Sheet, Geologic Atlas of Texas prepared by the Bureau of Economic Geology. This map presents geologic units and structural features within the vicinity of the facility with text describing the stratigraphy and lithology of the map units. The facility is located on Neogene sediment overlain by Quaternary windblown sediment.

The generalized stratigraphic column of the area beneath the facility is presented to a depth of approximately 1,600 ft-bgs, which is the base of the Evangeline Aquifer. Based on Figure II-12, Geologic Map and Figure II-13, Stratigraphic Cross-Section, the Goliad Formation outcrops in the vicinity and is overlain by a veneer of Holocene eolian deposits. A description of the stratigraphy, including geologic age,

lithology including variations, thickness, depth, geometry, hydraulic conductivity, and depositional facies of each geologic unit as available through current geologic information is included in Table III4-1.

**Table II-10: Stratigraphic Units Underlying Facility**

System	Series	Age (M.Y.)	Stratigraphic Units	Lithology	Approx. Thickness (ft)	Approx. Depth (ft-bgs)	Geometry	Hydraulic Conductivity	Depositional Facies
Quaternary	Holocene	0.02	Stabilized Sand Dune Deposits	Sand; Silt	0-30	10	Sand sheets and dunes	Moderate to High	Eolian
Neogene	Miocene	4.4	Upper Goliad	Clay or Mud; Sandstone; Mudstone, Carbonate, Limestone, Conglomerate	400	400	Large planar, cross bedding, and lamination.	Moderate	Fluvial / Meander belt
		11.3	Lower Goliad		550	950			Dips east towards gulf coastline; units thicken down dip
		13.3	Upper Lagarto	Sandstone	650	1600			
		15.6	Middle Lagarto	Clay or Mud	700	2300	Low		

(Table compiled after Baker, 1979; Chowdhury and Mace, 2007; and Young et al., 2010)

### 2.5.1.2 Soils

Figure II-14, Soils Map presents the distribution of six soil series, predominantly loamy, located across the facility according to the Soil Survey of Hidalgo County, Texas. These soil series include: the Brennan, Hebronville (#22, #23, and #24), Hidalgo, Racombs, and Willacy Series. Table II-11, Soil Types lists sixteen soil types within the facility boundary, percentage of area covered, and potential for water and wind erosion.

**Table II-11: Soil Types**

Soil	Unit Name	Area Covered <sup>1</sup> (%)	Water Erosion Hazard	Wind Blowing Hazard
3	Brennan fine sandy loam, 0 to 1 percent slopes	7.8	Slight	Moderate
9	Delfina loamy fine sand, warm, 0 to 2 percent slopes	4.2	Moderate	Severe
16	Hargill fine sandy loam, 0 to 1 percent slopes	9.5	Slight	Moderate
17	Hargill fine sandy loam, 1 to 3 percent slopes	6.6	Moderate	Moderate
22	Hebronville sandy loam, 0 to 1 percent slopes	7.7	Slight	Moderate

Soil	Unit Name	Area Covered <sup>1</sup> (%)	Water Erosion Hazard	Wind Blowing Hazard
23	Hebbronville sandy loam, 1 to 3 percent slopes	11.7	Moderate	Moderate
24	Hebbronville sandy loam, 3 to 5 percent slopes	8.9	Severe	Moderate
25	Hidalgo fine sandy loam, 0 to 1 percent slopes	9.1	Slight	Moderate
48	Racombes sandy clay loam	5.1	Slight	Slight
60	Rio clay loam	1.2	Moderate	Slight
70	Willacy fine sandy loam, 0 to 1 percent slopes	19.1	Slight	Moderate
71	Willacy fine sandy loam, 1 to 3 percent slopes	4.0	Moderate	Moderate

Notes:

- The percentages do not add up to 100% due to part of the area being occupied by the landfill and ponds that are not accounted for in the data. The data is obtained from the NRCS Web Soil Survey Tool: <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

### 2.5.2 Active Geologic Faulting Assessment

30 TAC §330.61(j)(2) & §330.555(a)

New municipal solid waste landfill units and lateral expansions shall not be located within 200 feet of a fault that has had displacement in Holocene time (representing the most recent 10,000 years), referred to herein as an active fault. Sites located within areas that may be subject to differential subsidence or active geological faulting must include detailed fault studies. When an active fault is known to exist within 1/2 mile of the site, the site must be investigated for unknown faults. There is no evidence of active geological faulting or differential subsidence that would impair the integrity of any landfill component.

Salt domes cause much of the recent fault activity in the Gulf Coastal Plains. In Hidalgo County, salt domes are rare because the Jurassic salt layer, found throughout the Gulf Coast, is thin (Worral & Snelson, 1989). This occurrence has reduced recent fault activity to a minimum in Hidalgo County. The Geologic Atlas of Texas (McAllen-Brownsville Sheet) presented in Figure II-12, Geologic Map and Texas Water Development Board (TWDB) Reports showing faults, were reviewed to determine the presence of faults within the vicinity. Based on the review of the maps and published literature, there are no faults or surface expression of Holocene faults indicated within a one-half-mile radius of the facility. As depicted on Figure II-12, Geologic Map there are no mapped surface expressions of active or inactive faults located within at least a five-mile-radius of the facility

### **2.5.3 Seismic Impact Zone Assessment**

30 TAC §330.61(j)(3) & §330.557

New municipal solid waste landfill units and lateral expansions shall not be located in seismic impact zones. A seismic impact zone is defined as an area with a 10-percent or greater probability that the maximum horizontal acceleration in lithified earth material, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 250 years.

The 2014 U.S. Geological Survey (USGS) National Seismic Hazard Maps display earthquake ground motions for various probability levels across the United States up to 50 years. According to the USGS, ground motion values having a 2% probability of exceedance in 50 years should be approximately the same as those having 10% probability of being exceeded in 250 years. Figure II-15, Seismic Impact Map shows the maximum horizontal acceleration is approximately 0.02g at the location of the facility. Because the maximum horizontal acceleration is less than 0.1g, the facility is not located in a seismic impact zone.

### **2.5.4 Unstable Areas Assessment**

30 TAC §§330.61(j)(4) & 330.559

An unstable area is defined to be a location that is susceptible to natural or human-induced events or forces capable of impairing the integrity of some or all of a landfill's structural components responsible for preventing releases from the landfill; unstable areas can include poor foundation conditions, areas susceptible to mass movement, and karst terrains. No unstable areas exist within the vicinity of the facility that would impair the integrity of any landfill components.

#### **2.5.4.1 Local Soil Conditions**

The soils within vicinity of the facility are predominantly sandy loam and have similar soil properties. They are well drained because of high infiltration rates and lack natural drainage features. No significant differential settling is anticipated.

#### **2.5.4.2 Local Geologic or Geomorphologic Features**

The lithology within the vicinity of the facility is moderately consistent and no indication of any karst conditions, active geological faulting, or presence of salt domes; therefore no differential subsidence is anticipated.

#### **2.5.4.3 Local Human-Made Features**

In Part III3, Waste Management Unit Design analyses were performed to assess the performance of the landfill with respect to slope stability and settlement using very conservative assumptions. Results of the analyses indicate slope stability and long-term settlement would not impair the integrity of the landfill's

structural components responsible for preventing releases, including performance of the leachate collection system.

## **2.6 Groundwater and Surface Water**

### **2.6.1 Groundwater Conditions**

§330.61(k)(1)

A detailed discussion of the groundwater conditions is included in Part III4, Geology Report. Based upon an evaluation of the soil boring and groundwater data from subsurface investigations, the uppermost water-bearing unit (uppermost aquifer) is identified as fine, poorly graded, sands or silty sand layer. Based on hydrogeologic investigations of the facility area, vertical flow is restricted by underlying low permeability clays that act as a local aquiclude dividing the uppermost water-bearing unit from lower aquifers.

The predominant groundwater flow direction in the uppermost water-bearing unit (uppermost aquifer) is generally controlled by the natural surface topography. Groundwater generally flows towards the southeast from the northwest within the currently permitted area; within the expansion area groundwater flow is predominantly towards the east, northeast, or southeast in subdued conformance to topography.

### **2.6.2 Surface Water Conditions**

30 TAC §330.61(k)(2)

A detailed discussion of the surface water conditions is included in Part III4, Geology Report. Gullying and channeling are uncommon in the area because of high infiltration rates and little relief. Soils in the area are well drained and have slopes of less than or equal to 5.2%. Only sheet flow may occur during very heavy rainfall as evident by lack of natural drainage features on or near the facility.

### **2.6.3 Texas Pollutant Discharge Elimination System**

30 TAC §330.61(k)(3)

The facility is designed to prevent the discharge of pollutants into waters of the State of Texas or waters of the United States, as defined by the Texas Water Code and the Federal Clean Water Act, respectively. As demonstrated in Part III2, Surface Water Drainage Report the storm water ponds have freeboards ranging from a minimum of 5 feet to over 10 feet considering the 25-year 24-hour design storm; such design ensures that the ponds have adequate capacity for more severe storms or consecutive storms. All stormwater will be contained within the facility boundary with no discharge into surface water in the state, including no discharge during, or as the result of any storm event.

According to the Texas Pollution Discharge Elimination System (TPDES) General Permit TXR050000, Part II, Section B, 12(f), "Facilities that dispose of all storm water associated with industrial activity by any of the following practices would not be required to obtain coverage for the storm water under this general permit nor under an individual TPDES permit or alternative general permit: (f) Containment of all storm water within property boundaries, with no discharge into surface water in the state, including no discharge during, or as the result of, any storm event." Therefore, the facility would not be required to obtain coverage under TPDES General Permit or alternate general permit.

#### **2.6.4 Location Restrictions**

30 TAC §330.549(a)&(b)

The facility is not located over the Edwards Aquifer recharge zone and is not subject to 30 TAC Chapter 213. No Class 1 cells exist or are proposed at the facility; therefore, the facility is not subject to location restrictions 30 TAC §335.584(b)(1)&(2) and is not subject to active coastal shoreline erosion and 30 TAC §335.584(b)(4) & 30 TAC §330.561.

### **2.7 Abandoned Oil, Gas, and Water Wells**

#### **2.7.1 Water Wells**

30 TAC §330.61(l)(1)

As described in Section 2.3.7.1 of this narrative, there are no located water wells situated within the facility. The City does not require water wells for supply for operations at the landfill. Should any unknown existing or abandoned water wells be discovered during facility development, the City shall provide, within 30 days prior to construction, the executive director with written certification that all such wells have been capped, plugged, and closed in accordance with all applicable rules and regulations of the commission or other state agency.

#### **2.7.2 Oil and Gas Wells**

30 TAC §330.61(l)(2)

There are two plugged gas wells, identified as OG-2 and OG-4, situated within the facility. If any abandoned crude oil or natural gas wells or other wells associated with mineral recovery are located during site development, the City shall provide the executive director with written certification that these wells have been properly capped, plugged, and closed in accordance with all applicable rules and regulations of the Texas RRC.

In addition, a producing natural gas well owned by VEFI identified as OG-1 is located within the facility boundary. OG-1 will not affect or hamper landfill operations and may remain.

## **2.8 Floodplains**

30 TAC §§330.61(m)(1) & 330.547(b)

The facility's northern boundary extends into two small unnamed ponding areas designated as a 100-yr flood zone without floodways. Construction of the facility's perimeter berm and storm water management structures—placement of fill in the 100-yr flood zone without floodways—will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment. The City of Edinburg has jurisdiction over the facility and adjacent properties and the Director of Public Works has reviewed and approved the construction of the facility's perimeter berm and storm water management structures.

### **2.8.1 Location**

The facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D dated June 6, 2000 as depicted in Figure IIC-1, Flood Insurance Rate Map (FIRM). A Flood Insurance Study (FIS) and FIRM for the Unincorporated Areas of Hidalgo County, Texas, have been revised by a Letter of Map Revision (LOMR) case number 01-06-1095P dated May 17, 2001 to reflect revised hydrologic and hydraulic analyses, and more accurate topographic information. Figure IIC-2, Revised FIRM to Reflect LOMR depicts the facility's property boundary on the revised FIRM based on LOMR 01-06-1095P with revised Special Flood Hazard Areas (SFHA). The most current SFHA delineations available are FEMA Quality Level 3 (Q3) Flood Data files. Figure IIC-3, FEMA Q3 Flood Data shows the facility's northern boundary extends into two small unnamed ponding areas designated as SFHA Zone A, 100-year flood with no base flood elevations determined.

### **2.8.2 Data Source**

The Facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D dated June 6, 2000, which was revised by LOMR 01-06-1095P dated May 17, 2001. The SFHA changes made by subsequent Letter of Map Changes (LMOCs) have not yet been incorporated into FEMA's National Flood Insurance Program (NFIP) National Flood Hazard Layer (NFHL) digital database and does not yet contain high resolution flood hazard mapping data for Hidalgo County. The most current SFHA delineations available for the project area are FEMA Quality Level 3 (Q3) Flood Data files as verified by FEMA.

### **2.8.3 Floodplain Evaluation**

A floodplain evaluation for TCEQ Permit MSW-956B was performed using FIRM revised by a LOMR case number 01-06-1095P dated May 17, 2001 as depicted on Figure IIC-2, Revised FIRM to Reflect LOMR. Appendix IIC1, Floodplain Evaluation for TCEQ Permit MSW-956B includes floodplain correspondence in

Appendix IIC1-1 and documentation that the development of TCEQ Permit MSW-956B was certified not to violate floodplain restrictions in Appendix IIC1-2.

A floodplain evaluation was performed for the expansion property for TCEQ Permit MSW-956C as depicted in Figure IIC-3, FEMA Q3 Flood Data and a request for Conditional Letter of Map Revision Based on the Placement of Fill (CLOMR-F) was submitted to FEMA. Appendix IIC2, Floodplain Evaluation for TCEQ Permit MSW-956C Expansion Area includes Appendix IIC2-1, FEMA CLOMR-F Request which includes a detailed evaluation of proposed fill in the two SFHA Zone A areas, figures detailing facility design plan and profiles, and required documentation to demonstrate compliance with each applicable requirement of 30 TAC §§330.63(c)(2), 330.307(b), and 330.547.

As discussed in Appendix IIC2-1, FEMA CLOMR-F Request, the facility's stormwater management system will incorporate ponds with adequate capacity to hold all runoff, and there will be no offsite stormwater discharge except the insignificant runoff from the exterior slope of the access road berm. The facility perimeter berms are designed to protect deposited waste from flooding. The diversion structures route stormwater run-off to the stormwater ponds along the perimeter of the facility and the access roads prevent run-on from entering the facility.

As detailed in Appendix IIC2-1, FEMA CLOMR-F Request, FEMA's Q3 Flood Data Zone A delineation was used to determine a 100-year base flood elevation (BFE) of 86 feet above mean sea level (ft-msl) for the two small unnamed ponding areas designated (SFHA) Zone A without floodways using contour interpolation as described in FEMA's guide, Managing Floodplain Development in Approximate Zone A Areas. Figure 4 in Appendix IIC2-1, FEMA CLOMR-F Request presents Sections A and B for profile views of the northeast Zone A SFHA and northwest Zone A SFHA, respectively. Section A shows that the construction in the northeast Zone A SFHA includes the waste buttressed by a landfill perimeter berm, a facility stormwater perimeter channel, and a perimeter access road with a crest elevation of 95 ft-msl. Section B shows the waste buttressed by a landfill perimeter berm, a stormwater perimeter channel, an access road with a minimum elevation of 89 ft-msl, a stormwater pond, and a facility perimeter berm with a minimum elevation of 89 ft-msl, i.e. a 3-ft minimum freeboard is maintained above the 100-year design flood (86 ft-msl) in accordance with 30 TAC 330.307(b).

As demonstrated in Appendix IIC2-1, FEMA CLOMR-F Request, construction of the facility's landfill perimeter berm and storm water management structures—placement of fill in the SFHA Zone A areas—will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment.

#### **2.8.4 Construction Approval**

Appendix IIC2-2, FEMA Response to CLOMR-F Request states the proposed development does not encroach on a FEMA designated floodway and no buildings are anticipated to be constructed on the site, there are no procedures under the NFIP regulations that require action on your requests by FEMA. Hidalgo County, or other agencies having jurisdiction of the site, may have requirements that apply. The City of Edinburg has jurisdiction over the facility and adjacent properties. The Director of Public Works reviewed and approved the request for CLOMR-F thus signing the Community Acknowledgement Form included in Appendix IIC2-3, Community Floodplain Management Review and Approval; therefore, no further action is required.

#### **2.9 Wetlands**

Appendix IID, Wetlands includes a wetlands evaluation and correspondence with the Department of Army, US Army Corps of Engineers (USACE).

##### **2.9.1 Wetlands Determination**

30 TAC §330.61(m)(2)

Appendix IID1, Wetlands Evaluation is a wetlands assessment for the facility's expansion area conducted by Naismith Engineering, Inc. (NEI) under applicable federal, state, and local laws. The assessment was conducted to determine if existing water features within the facility's expansion area meet federal 33 CFR §328.3(c)(4) and state 30 TAC §307.3(84) criteria for wetlands, and if any jurisdictional "waters of the US" are within the expansion area. Under the federal Clean Water Act § 404 (CWA § 404), the USACE regulates the discharge of dredged and fill material into "waters of the US". The phrase "waters of the US" defines the extent of the USACE's geographic jurisdiction of the CWA § 404. There are no known local laws or ordinances that would regulate or otherwise apply to wetlands within the proposed expansion area.

The wetlands assessment identified a potential wetland meeting the criteria of hydrology, vegetation, and hydric soils and performed a wetland delineation. The delineated isolated wetland is approximately 1/3 acre in size and located in the middle of the facility's expansion area. According to the wetlands assessment, the small isolated wetland of less than an acre has been manipulated over time by agricultural practices and may have been created by excavation; therefore the potential wetland does not meet state 30 TAC §307.3(84) criteria for wetlands.

A request for wetlands verification was submitted to the Galveston District of USACE. The USACE issued an approved jurisdictional determination that the small isolated wetland is not a water of the U.S. and is based on the isolated nature and the lack of a significant nexus to navigable or interstate waters. A Department of the Army permit is not required for expansion of the facility.

## 2.9.2 Wetlands Location

30 TAC §§330.61(m)(3), 330.553(a), & 330.553(b)

No federally jurisdictional wetlands nor existing water features meeting state criteria for wetlands are located within the facility boundary. Therefore compliance with location restrictions 30 TAC §330.553 is not required.

## 2.10 Endangered or Threatened Species

An Endangered Species Biological Assessment, Texas Parks and Wildlife Department (TPWD) recommendations, and United States Department of the Interior Fish and Wildlife Service (USFWS) agreements are included in Appendix IIE, Endangered or Threatened Species.

### 2.10.1 Protection of Endangered or Threatened Species 30 TAC §§330.61(n)(1) & 330.551(b)(1)

Construction and operation of the facility shall not result in the destruction or adverse modification of the critical habitat or cause or contribute to the taking of endangered or threatened species.

### 2.10.2 Endangered or Threatened Species Assessment

30 TAC §330.61(n)(2)

Naismith Engineering, Inc. (NEI) performed an Endangered Species Biological Assessment for the landfill expansion area under applicable federal, state, and local laws. As part of the assessment, they conducted field surveys to determine if environmental features necessary for supporting the list of Federal and State threatened and endangered species existed. Emphasis was directed towards three areas designated as upland habitat types along the eastern boundary of the proposed expansion area that would be more likely to contain suitable habitat for threatened and endangered species. The assessment identified 18 of the 79 listed species that could potentially occur within the landfill expansion area based on habitats observed during the site visit. Of those, 11 species could potentially be impacted or affected by the proposed project expansion activities if present at the site: one federal- and state-listed endangered, eight state-listed threatened, and two state-listed rare.

The City submitted a request for threatened or endangered species review to the TPWD Wildlife Diversity Program and USFWS Wildlife Diversity Program. TPWD responded with recommendations which included preservation of potential ocelot habitat. In response, the City made an agreement with USFWS to preserve a 200-foot wide corridor of dense native woodland along the northern property boundary established with native vegetation, connecting to the southern property boundary of dense native woodland owned by the City.

## 2.11 Texas Historical Commission Review

30 TAC §330.61(o)

The City submitted a request for review to the Texas Historical Commission (THC) documenting compliance with the Natural Resources Code, Chapter 191, Texas Antiquities Code. The request included two figures showing the general location and site location with existing and proposed limits of the permit boundary and copies of the previously submitted letters documenting archeological and historical review. The State Historic Preservation Officer determined that no survey was required and the project may proceed. Documentation of correspondence with THC is included in Appendix IIF, Texas Historical Commission.

## 2.12 Council of Governments and Local Government Review Request

30 TAC §§330.61(p) & 330.57(e)(2)

The City submitted a MSW Facility Permit Application Review Form to the Lower Rio Grande Valley Development Council (LRGVDC) and gave a presentation to the Solid Waste Advisory Committee (SWAC). LRGVDC responded that Board of Directors has gone on record with favorable comments and the expansion of the landfill falls within the goals of the LRGVDC Regional Solid Waste Management Plan. Parts I and II of this application and any subsequent revisions will be furnished to the LRGVDC. Documentation of correspondence with LRGVDC is included in Appendix IIG, Council of Governments.

## 3.0 FACILITY LAYOUT PLAN

The landfill expansion will add 349.0 acres resulting in a facility boundary of 602.5 acres, a waste disposal area of 406.0 acres, and a 196.5 acres of non-waste disposal to be used for buffer, landfill access roads, leachate force main, and drainage features with 11 storm water ponds.

### 3.1 Easements and Buffer Zones

#### 3.1.1 Easement Protection

30 TAC §330.543(a)

No solid waste unloading, storage, disposal, or processing operations shall occur within any easement, buffer zone, or right-of-way that crosses the facility. No solid waste disposal shall occur within 25 feet of the center line of any utility line or pipeline easement but no closer than the easement, unless otherwise authorized by the executive director. All pipeline and utility easements shall be clearly marked with posts that extend at least 6 feet above ground level, spaced at intervals no greater than 300 feet.

#### 3.1.2 Buffer Zones

The facility will provide and maintain buffer zones within and adjacent to the permit boundary and shall not be narrower than that necessary to provide for safe passage for firefighting and other emergency vehicles.

c:\users\kcrowe\golder associates\1401491, city of edinburg permit application tceq msw 956 - documents\application\response to first nod\part ii\ii.docx

Submitted: July 2017

Revised: November 2017

### 3.1.2.1 Buffer Zone Establishment

30 TAC §330.543(b)(2)

A buffer zone by definition is a zone free of municipal solid waste processing and disposal activities within and adjacent to the facility boundary on property owned or controlled by the owner or operator. Buffer distances from the waste footprint to the facility boundary are illustrated on Figure II-17, Facility Layout Plan.

Buffer zones for Pre-Subtitle D Units 1-4 and Subtitle D Units 5 and 6 were established under TCEQ Permit MSW-956A and TCEQ Permit MSW-956B, respectively before the comprehensive rule revisions of 30 TAC §330.543 as adopted in 2006 became effective; therefore, the buffer zones in the area are subject to the former rules and shall be maintained in compliance with the permit. Buffer zones for Pre-Subtitle D Units 1-4 and Subtitle D Units 5 and 6 were established at 100 feet with an exception of an established 50-foot buffer zone along the southeast corner of Unit 5.

For any vertical expansion, a 125-foot buffer zone must be maintained. The vertical expansion over Pre-Subtitle D Units 1-4 and Subtitle D Units 5 and 6 is the height increase that exceeds the maximum permitted final contour. The buffer distance is measured from the outermost edge of the newly permitted solid waste disposal airspace. The buffer distance for the vertical expansion over Pre-Subtitle D Units 1-4 and Subtitle D Units 5 and 6 is greater than 125 feet and therefore is in compliance with §330.543(b)(2).

For any lateral expansion to areas not previously permitted, a 125-foot buffer zone must be maintained. The buffer distance is measured from the edge of the horizontally expanded portion of the landfill. The buffer distance for the lateral expansion of Unit 7 will be greater than 125 feet along the eastern and northern permit boundary. However, the buffer distance for Unit 7 along the southern boundary will be 100 feet because the prescribed buffer zone standard is not feasible for alignment and keying into previously approved Unit 6. This is also the case if the Unit 8 option instead of the Overliner option is developed, which is discussed in Section 3.4.1. An alternative to the buffer zone requirement is demonstrated in the following section.

### 3.1.2.2 Alternate to Buffer Zone Requirements

30 TAC §330.543(b)(3)

The prescribed standard to maintain a 125-foot buffer zone for a lateral expansion into areas not previously permitted is not feasible along the southern boundary of Unit 7. Likewise, it is not feasible if the Unit 8 option instead of the Overliner option is developed. It is most feasible to maintain a 100-foot buffer zone because construction and waste filling operations will be aligned with Unit 6.

The City owns the property south of the facility boundary and the Type I Landfill is adjacent to the Type IV Landfill TCEQ Permit MSW-2302. As indicated on Figure II-17, Facility Layout Plan the facility currently shares a perimeter access road with the Type IV landfill, thereby providing ready access for emergency response, maintenance, and monitoring, as well as sufficient distance to meet the drainage and sediment control requirements applicable to the facility. Visual screening of solid waste disposal activities and control of odors and windblown waste of a 100-foot buffer zone will be equivalent to that of the prescribed standard.

### 3.2 Facility Layout Drawings

30 TAC §330.61(d)

The following facility layout drawings are provided in this document.

**Table II-12: Facility Layout Drawings**

Figure	Title	Citation
II-16	Facility Entrance Plan	30 TAC §330.61(d)(4),(6),(7),&(8)
II-17	Facility Layout Plan	30 TAC §330.61(d)(1),(2),(3),&(9)(A)
II-18A	Subgrade Layout Plan – Overliner Option	30 TAC §330.61(d)(9)(D)
II-18B	Subgrade Layout Plan – Unit 8 Option	30 TAC §330.61(d)(9)(D)
II-19	Final Contour Map	30 TAC §330.61(d)(9)(E)
II-20	Operational Sequence I	30 TAC §330.61(d)(5),(9)(B),&(9)(C)
II-21	Operational Sequence II	30 TAC §330.61(d)(5),(9)(B),&(9)(C)
II-22	Operational Sequence III	30 TAC §330.61(d)(5),(9)(B),&(9)(C)
II-23	Operational Sequence IV	30 TAC §330.61(d)(5),(9)(B),&(9)(C)
II-24	Operational Sequence V	30 TAC §330.61(d)(5),(9)(B),&(9)(C)
II-25	Operational Sequence VI	30 TAC §330.61(d)(5),(9)(B),&(9)(C)

Note: 30 TAC §330.61(d)

- (1) the outline of the units
- (2) general locations of main interior facility roadways, and for landfill units, the general locations of main interior facility roadways that can be used to provide access to fill areas
- (3) locations of monitor wells
- (4) locations of buildings
- (5) any other graphic representations or marginal explanatory notes necessary to communicate the proposed construction sequence of the facility
- (6) fencing
- (7) provisions for the maintenance of any natural windbreaks, such as greenbelts, where they will improve the appearance and operation of the facility and, where appropriate, plans for screening the facility from public view
- (8) all site entrance roads from public access roads
- (9) for landfill units
  - (A) sectors with appropriate notations to communicate the types of wastes to be disposed of in individual sectors
  - (B) the general sequence of filling operations
  - (C) sequence of excavation and filling
  - (D) dimensions of cells or trenches
  - (E) maximum waste elevations and final cover.

### 3.3 Facility Entrance Plan

The facility entrance and maintenance facilities are located south of the Type I disposal areas. Figure II-16, Facility Entrance Plan illustrates existing facility buildings and designated areas, existing fencing and screening, and site entrance roads.

#### 3.3.1 Facility Buildings

30 TAC §330.61(d)(4)

Existing structures/areas located at the facility, which will remain as part of this permit amendment application, include:

- Landfill administrative office
- Maintenance buildings
- Gatehouse and scales
- Dumpster / roll off box storage area
- Citizen collection station
- Landfill gas to energy facility including landfill flare and blower
- Reusable material staging area
- Large item salvage and white goods storage area
- Fuel storage tank

#### 3.3.2 Fencing

30 TAC §§330.61(d)(6) & 330.223(c)

Access to the facility is controlled by a perimeter fence, a composite of either a four-foot barbed wire fence or a six-foot steel-link mesh fence, 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.

A gate located at the facility entrance is locked by site personnel at the end of the day's operations. Another gate is located on the west side of the facility on Encinitos Road and is locked unless access is needed by site personnel.

### 3.3.3 Screening

30 TAC §330.61(d)(7)

Although there exist some visual screening of the along the southern portion of the facility boundaries, plans for screening the facility from public view is not required because the nearest high traffic roadway is located approximately 1,900 feet to the west and surrounding land use is primarily agricultural and industrial.

### 3.3.4 Site Entrance Roads

30 TAC §330.61(d)(8)

The facility entrance is located at 8601 Jasman Rd north of FM 2812 and is shared with the City's Type IV Landfill TCEQ Permit MSW-2302. Access to the facility entrance from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Rd. The site entrance of the facility is on its southern permit boundary directly north of the scale house as shown on Figure II-16, Facility Entrance Plan

## 3.4 Facility Layout Plan

30 TAC §330.61(d)(9)(A)

Figure II-17, Facility Layout Plan illustrates an outline of the solid waste management units to receive waste accepted by facility as outlined in §1.0, Waste Acceptance Plan; general locations of main interior facility roadways that can be used to provide access to fills areas; surface water drainage features and ponds; buffer zones; and location of monitoring wells. Figure II-17, Facility Layout Plan includes the location of the permanent site benchmark.

### 3.4.1 Outline of Solid Waste Management Units

30 TAC §330.61(d)(1)

Figure II-17, Facility Layout Plan illustrates an outline of the solid waste management units. Waste within Pre-Subtitle D Units 1-4 will either be relocated for development of Unit 8 or an Overliner will be constructed for vertical expansion. Therefore, Subtitle D waste disposal areas are 52.9 acres in Unit 5, 110.8 acres in Unit 6, 205.7 acres in Unit 7, and 36.6 acres in Unit 8/Overliner.

### 3.4.2 Interior Facility Roadways

30 TAC §330.61(d)(2)

The facility has interior roadways that can be used to provide access to the solid waste management units as shown on Figure II-17, Facility Layout Plan.

### **3.4.3 Monitoring Wells**

30 TAC §330.61(d)(3)

Figure II-17, Facility Layout Plan shows the location of 38 monitoring wells used for the groundwater monitoring system outlined in Part III5, Groundwater Characterization Report.

### **3.5 Subgrade Layout Plan**

30 TAC §330.61(d)(9)(D)

Currently active disposal areas are Unit 5, Cells SD-1 through SD-8 and Unit 6, Cells 1A through 6A. Figure II-18A, Subgrade Layout Plan – Overliner Option, depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Overliner and lists their approximate dimensions. Likewise Figure II-18B, Subgrade Layout Plan –Unit 8 Option, depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Unit 8 and lists their approximate dimensions. Cells may be divided into smaller areas for development. Resulting divisions will be labeled with parent cell designation appended with an incremental letter.

### **3.6 Final Contour Map**

30 TAC §330.61(d)(9)(E)

Figure II-19, Final Contour Map depicts the maximum final cover elevation of approximately 398 ft-msl. The maximum waste elevation is the final cover elevation minus the thickness of final cover and is dependent on thickness of the final cover lining option used. Part III7, Closure Plan details final cover lining options.

### **3.7 Sequence of Site Development**

30 TAC §330.61(d)(5)

Figures II-20, Operational Sequence I – V demonstrate the general sequence of filling operations and sequence of excavation.

The pattern of waste disposal will be governed by the area fill disposal method. Landfilling will occur below grade and above grade, depending on the stage of operational development and operational considerations. Initially, filling will occur above grade over the existing constructed fill areas to attain the design top of waste grades. New landfill cells will be developed adjacent to existing filled areas and waste placement operations will continue below grade.

Waste filling operations have been completed on the Pre-Subtitle D areas and final cover has been constructed over the Units 1–4. As waste placement progresses on the Subtitle D units, final cover will be placed in incremental phases to meet the 180-day requirement for a landfill unit that has reached final waste grade. Figures II-20, Operational Sequence I – V present the basic capping sequence that will be followed.

It is expected that the largest area to receive final cover will be approximately 159.1 acres as shown on Figure II-20A, Operational Fill Sequence I.

Groundwater and landfill gas monitoring will be on-going activities for the life of the site. Monitoring wells MW-101 through MW-126 and gas monitoring probes GP-101 through GP-126 will be installed at the approximate locations identified on Figure II-17, Facility Layout Plan.

Storm water from the developed waste disposal units will be collected by add-on berms and downchutes constructed on the cover of the landfill and routed to perimeter channels around the perimeter of the disposal units. The surface water will then be conveyed to the storm water ponds located on the north and east sides of the waste disposal units. The 11 storm water ponds collectively have sufficient storage capacity for severe or consecutive storms.

### 3.7.1 Schedule of Development

30 TAC §330.61(d)(9)(B)&(C)

An anticipated schedule of development for this facility is provided in Table II-13, Schedule of Development. Cells within lateral expansion Unit 7 and Unit 8/Overliner may be incrementally constructed wholly or partially in any sequence for operational feasibility.

**Table II-13: Schedule of Development**

Operational Sequence I	Waste Fill	Waste placement in Units 5 and 6.	
	Excavation	Excavate the southern portion of Unit 7 for soil borrow.	
	Cell Construction	Construct the southern portion of Unit 7, Cells 1–7	
	Storm Water Control Features	Amend existing and construct additional perimeter channels and construct storm water Ponds W1, W2, W6, E1, and E2	
	Groundwater Monitoring System	Abandon	MW-1R, MW-8R, MW-7R, MW-4A, MW-11, MW-15R, MW-16, MW-19, MW-14R, MW-20, MW-17, & MW-21
		Install	MW-101, MW-102, MW-103, MW-104, & MW-105
Landfill Gas Monitoring System	Abandon	GP-32, GP-33, GP-18, GP-19R, GP-36, GP-37, GP-38, GP-39, GP-40, GP-41, GP-42, & GP-43	
	Install	GP-101, GP-102, GP-103 & GP-104	

Operational Sequence II	Waste Fill	Waste placement in southern portion of Unit 7, Cells 1–7
	Excavation	Progressively excavate Unit 7 adjacent to sequential cell development for soil borrow.
	Cell Construction	Construct the northeast portion of Unit 7, Cells 6 – 9
	Storm Water Control Features	Construct storm water Ponds W3, W4, and W5.

	Groundwater Monitoring System	Install	MW-119, MW-120, MW-121, MW-122, MW-123, MW-124, MW-125, & MW-126
	Landfill Gas Monitoring System	Install	GP-119, GP-120, GP-121, GP-122, GP-123, GP-124, GP-125, & GP-126
	Final Cover Placement	North, west, and south side slopes of Unit 5 and north and south of Unit 6	

Operational Sequence III	Waste Fill	Waste placement in Unit 7, Cells 1–9	
	Excavation	Progressively excavate Unit 7 adjacent to sequential cell development for soil borrow.	
	Cell Construction	Construct northern portion of Unit 7, Cells 10 – 12.	
	Storm Water Control Features	Construct storm water Pond E4.	
	Groundwater Monitoring System	Install	MW-112, MW-113, MW-114, MW-115, MW-116, MW-117, & MW-118
	Landfill Gas Monitoring System	Install	GP-112, GP-113, GP-114, GP-115, GP-116, GP-117, & GP-118
	Final Cover Placement	South and southeast side slopes and of Unit 7	

Operational Sequence IV	Waste Fill	Waste placement in Unit 7, Cells 1–12	
	Excavation	For Unit 8 option of cell development, relocate Pre-Subtitle D waste and excavate to subgrade.	
	Cell Construction	Construct Unit 8/Overliner	
	Storm Water Control Features	Construct storm water Pond E3	
	Groundwater Monitoring System	Install	MW-108, MW-109, MW-110, & MW-111
	Landfill Gas Monitoring System	Install	GP-107, GP-108, GP-109, GP-110, & GP-111
	Final Cover Placement	East and northeast side slopes of Unit 7	

Operational Sequence V	Waste Fill	Waste placement in Unit 5, Unit 6, and Unit 8/Overliner	
	Storm Water Control Features	Construct storm water Pond W7	
	Final Cover Placement	North and west side slopes and crest of Unit 7	

Closure / Post Closure Care	Closure signs		
	Notify TCEQ of intent to close		
	Complete final cover construction over the waste fill units		
	Closure Certification		
	Affidavit to public is filed for notification of complete closure of facility		

### 3.7.2 Excavation and Bottom Liner Construction

30 TAC §330.61(d)(9)(C)

Throughout the development of the facility, the general excavation sequence will be as follows:

- Excavate to subgrade elevations shown on Figure II-18, Subgrade Layout Plan.
- Construct temporary erosion controls including diversion berms, channels, silt fences, and sediment basins.
- Construct an alternative liner system in accordance with Part III3F, Liner Quality Control Plan.

### 3.7.3 General Filling Sequence

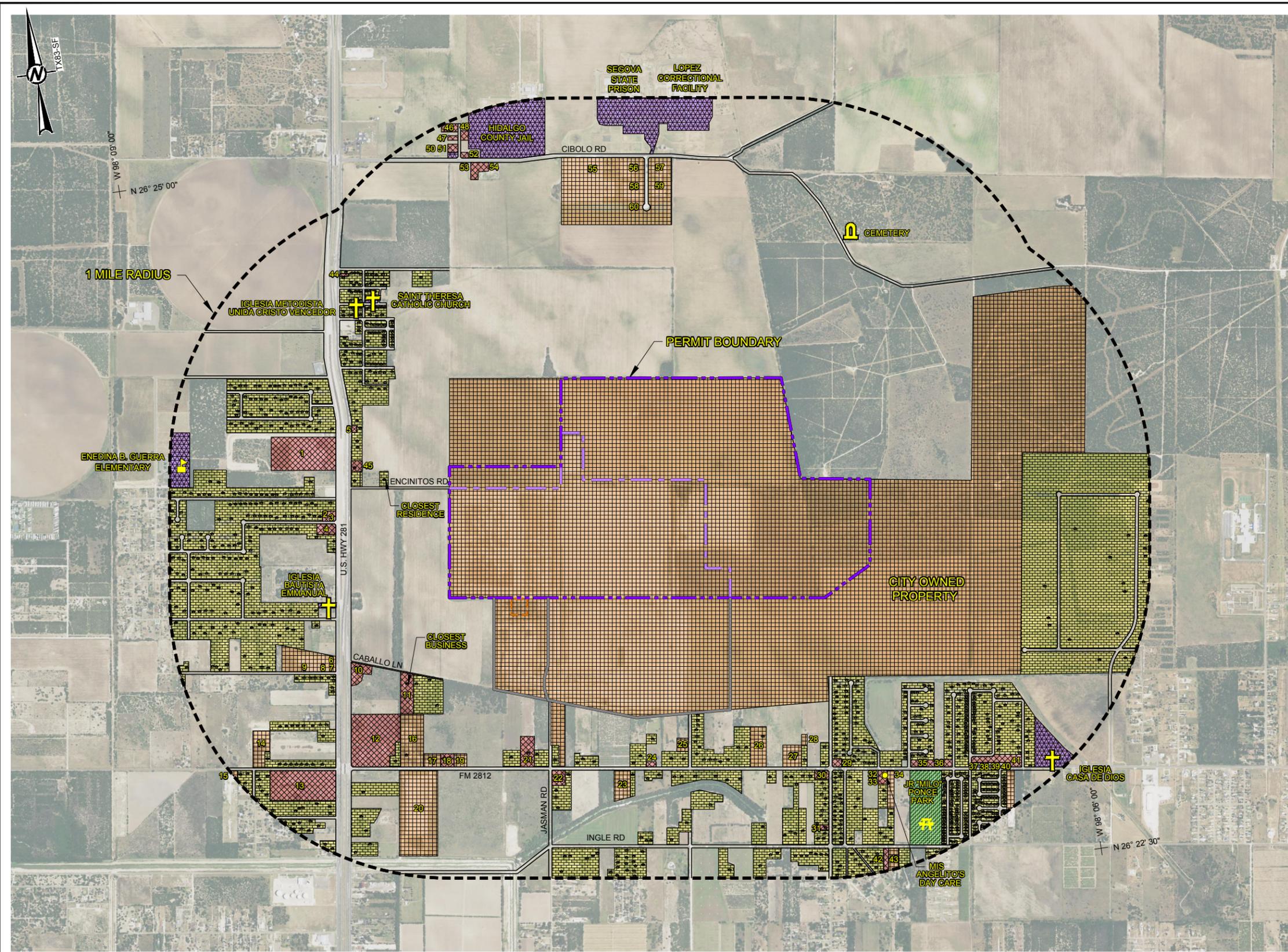
30 TAC §330.61(d)(9)(B)

Throughout the development of the facility, the general filling sequence will be as follows:

- The location of the initial working face in a newly constructed cell will be established around and including the sump area. Up-gradient berms will be constructed as necessary until the entire lined area of the constructed cell has been covered with waste including daily cover or an approved alternate.
- Place waste in lifts as determined by the site operator and construct storm water control berms as indicated within Part III2B, Active Face Berm Sizing.
- Temporary waste slopes will be graded at a maximum slope of 3H:1V. Temporary waste slope stability analysis is presented in Part III3B-2C, Interior Waste Slope Stability.
- Gas Collection and Control System will be installed incrementally as waste fill progresses in accordance with Part III6, Landfill Gas Management Plan.
- Provide intermediate cover as final grade is reached and in areas where storm water runoff discharges to the perimeter channel system.
- Install final cover in accordance with Part III7D, Final Cover Quality Control Plan over areas which will not receive additional waste.
- Drainage features must be incrementally constructed to manage surface water from within areas impacted by cell development in accordance to Part III2, Surface Water Drainage Report.
- Groundwater monitoring wells and gas probes must be installed within 500 feet of constructed cells prior to waste acceptance in accordance to Part III5, Groundwater Characterization Report and Part III6, Landfill Gas Management Plan respectively.

### 3.7.4 Closure and Post-Closure Care

Closure and Post Closure care of the facility are discussed in Part III7, Closure Plan and Part III8, Post-Closure Care Plan respectively.



**LEGEND**

	PERMIT BOUNDARY		RESIDENTIAL
	1 MILE RADIUS		RECREATIONAL
	COMMERCIAL		INSTITUTIONAL
	INDUSTRIAL		
	AGRICULTURAL / PASTURELAND / OPEN		

**SCHOOLS**  
 THERE IS ONE SCHOOL LOCATED WITH IN ONE MILE OF THE FACILITY. ENEDINA B. GUERRA ELEMENTARY IS LOCATED APPROXIMATELY 5,020 FT WEST AT 10010 VIA FERNANDEZ.

**CHURCHES**  
 THERE ARE 4 CHURCHES LOCATED WITHIN ONE MILE OF THE FACILITY. IGLESIA BAUTISTA EMMANUEL IS THE CLOSEST CHURCH LOCATED APPROXIMATELY 2,480 FT WEST OF THE FACILITY AT 9413 N. EXPRESSWAY 281.

**CEMETERY**  
 THERE IS ONE CEMETERY LOCATED WITHIN ONE MILE OF THE FACILITY. CIBOLO CEMETERY IS LOCATED APPROXIMATELY 2,900 FT NORTHEAST ON CIBOLO RD.

**LICENSED DAY CARE FACILITY**  
 THERE IS ONE LICENSED DAY CARE FACILITY LOCATED WITHIN ONE MILE OF THE FACILITY. MIS ANGELITO'S DAY CARE IS LOCATED APPROXIMATELY 3,530 FT SOUTH AT 3324 E FM 2812.

**RECREATIONAL AND PARKS AREA**  
 THERE IS ONE RECREATIONAL AREA LOCATED WITHIN ONE MILE OF THE FACILITY. J. R. "MILO" PONCE PARK IS LOCATED APPROXIMATELY 3,625 FT SOUTHEAST AT 3516 E FM 2812.

**RESIDENTIAL**  
 BASED ON FIELD INVENTORIES PERFORMED ON OCTOBER 2016 AND A REVIEW OF GOOGLE EARTH IMAGERY, IT IS ESTIMATED THAT THERE ARE APPROXIMATELY 972 EXISTING RESIDENCES LOCATED WITHIN ONE MILE OF THE FACILITY. THE NEAREST EXISTING RESIDENCE IS LOCATED APPROXIMATELY 1,230 FT WEST AT 1307 ENCINITOS RD.

**COMMERCIAL AND INDUSTRIAL**  
 BASED ON FIELD INVENTORIES PERFORMED ON OCTOBER 2016, REVIEW OF GOOGLE EARTH IMAGERY, AND REVIEW OF HIDALGO COUNTY APPRAISAL DISTRICT PROPERTY MAP SEARCH, APPROXIMATELY 60 BUSINESSES ARE LOCATED WITHIN ONE MILE OF THE FACILITY REPRESENTING A MIX OF BOTH COMMERCIAL AND INDUSTRIAL ACTIVITY. THE NEAREST BUSINESS, DOG OBEDIENCE INC., IS LOCATED APPROXIMATELY 1,590 FT SOUTHWEST AT 502 CABALLO LN.

1 HOLT CAT AGRIBUSINESS	31 UIS MARTINEZ ADAN
2 ALANIS AUTO CENTER	32 DAISY'S BEAUTY SALON
3 TEX MEX FOOD MART	33 MIS ANGELITO'S DAY CARE
4 SANTO CRUZ PROPERTIES	34 LAS CASITAS METAL BUILDINGS
5 LAURA'S KITCHEN	35 PUEBLO DE PALMAS
6 PRUMAR TRADING SOLUTIONS LLC	36 DELICIAS BAKERY
7 DCP MIDSTREAM	37 VILLA BONITA RESTAURANTE
8 LG PACKING CO.	38 EL FOGON
9 CHIP BERRY PRODUCE	39 MORA TIRES AND TRUCK CENTER
10 JEA TIRES	40 TEXAS SOUTH PROPANE
11 DOG OBEDIENCE SCHOOL	41 DOLLAR GENERAL
12 LOVE'S TRAVEL STOP	42 CHARLIE'S AUTO REPAIR
13 TA EDINBURG	43 G & D LOGISTICS LLC
14 AQUAWORKS PIPING	44 RODRIGUEZ BAIL BONDS
15 J BROTHERS TRUCKING	45 OWL HOUSE PAINTING LC
16 HIDALGO COUNTY WATER DISTRICT 15	46 METRO VALLEY SECURITY
17 GRIFFIN INDUSTRIES INC.	47 REYES BAIL BONDS
18 GARCIA'S LIFT TRUCK SERVICE	48 CORDOVA SOUTH TEXAS BAIL BONDS
19 BOOKER TRANSPORTATION SERVICES, INC.	49 ANZALDUA BAIL BONDS
20 DON HUGO PRODUCE	50 A-QUICK BAIL BONDS
21 RANCHOS LAS TRES MARIAS	51 LIBERTY BAIL BONDS
22 TAQUERIA LOS CASTILLO'S	52 DAVID'S BAIL BONDS
23 NORTH ALAMO WATER SUPPLY	53 A-FAST BAIL BONDS
24 CAMPOS AUTO REPAIR	54 CASTADA'S BAIL BONDS
25 DIAMOND "C" TRANSPORT	55 KEY ENERGY SERVICES
26 TANIS SIGNATURE TRANSPORT	56 CHEVRON
27 LAND COAST LOGICSTICS	57 SOUTHERN DISPOSALS
28 MRC TRANSPORT LLC	58 M-I LLC
29 D'NELLY'S RESTAURANT	59 BUTCH'S OILFIELD SERVICES, INC.
30 FAMILY DOLLAR	60 MISWACO

**NOTE(S)**  
 1. NO PONDS AND LAKES, HOSPITALS, OR HISTORIC SITES ARE LOCATED WITHIN 1 MILE.  
 2. DRAINAGE, PIPELINE, AND UTILITY EASEMENTS ARE SHOWN ON FIGURE II-6.  
 3. LAND USE PRESENTED IS ACTUAL LAND USE BASED ON FIELD INVENTORIES PERFORMED ON OCTOBER 2016 AND REVIEW OF GOOGLE EARTH IMAGERY AND NOT PLANNED LAND USE AS DEPICTED ON FIGURE II-5, ZONING MAP.

**REFERENCE(S)**  
 BASE MAP TAKEN FROM NATIONAL AGRICULTURE IMAGERY PROGRAM (NAIP) DIGITAL ORTHO PHOTO IMAGE PUBLISHED BY USDA-FSA-APFO DATED DECEMBER 16, 2014

**ISSUED FOR PERMITTING PURPOSES ONLY**



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI

SEAL

GOLDER ASSOCIATES INC.  
 TEXAS REGISTRATION F-2578

CLIENT

CONSULTANT

HOUSTON OFFICE  
 500 CENTURY PLAZA DRIVE, SUITE 190  
 HOUSTON, TEXAS  
 USA  
 [+1] (281) 821-6868  
 www.golder.com

PROJECT  
 EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**LAND USE MAP**

PROJECT NO.	APPLICATION SECTION	REV.	4 of 30	FIGURE
1401491	II	1		II-4

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

	PERMIT BOUNDARY
	2 MILE RADIUS
	INDUSTRIAL
	AGRICULTURAL
	SUBURBAN RESIDENTIAL
	COMMERCIAL, GENERAL
	NEIGHBORHOOD CONSERVATION
	NEIGHBORHOOD CONSERVATION

- REFERENCE(S)**
- ZONING MAP TAKEN FROM THE CITY OF EDINBURG, PLANNING & ZONING MAPS, DATED 6/16/2015, DELIVERED FROM <http://www.cityofedinburg.com/pzmaps.php>
  - CITY OWNED PROPERTY ANNEXED PER CITY ORDINANCE 2016-3946 APPROVED OCTOBER 3, 2017.

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	CGD	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
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PROJECT

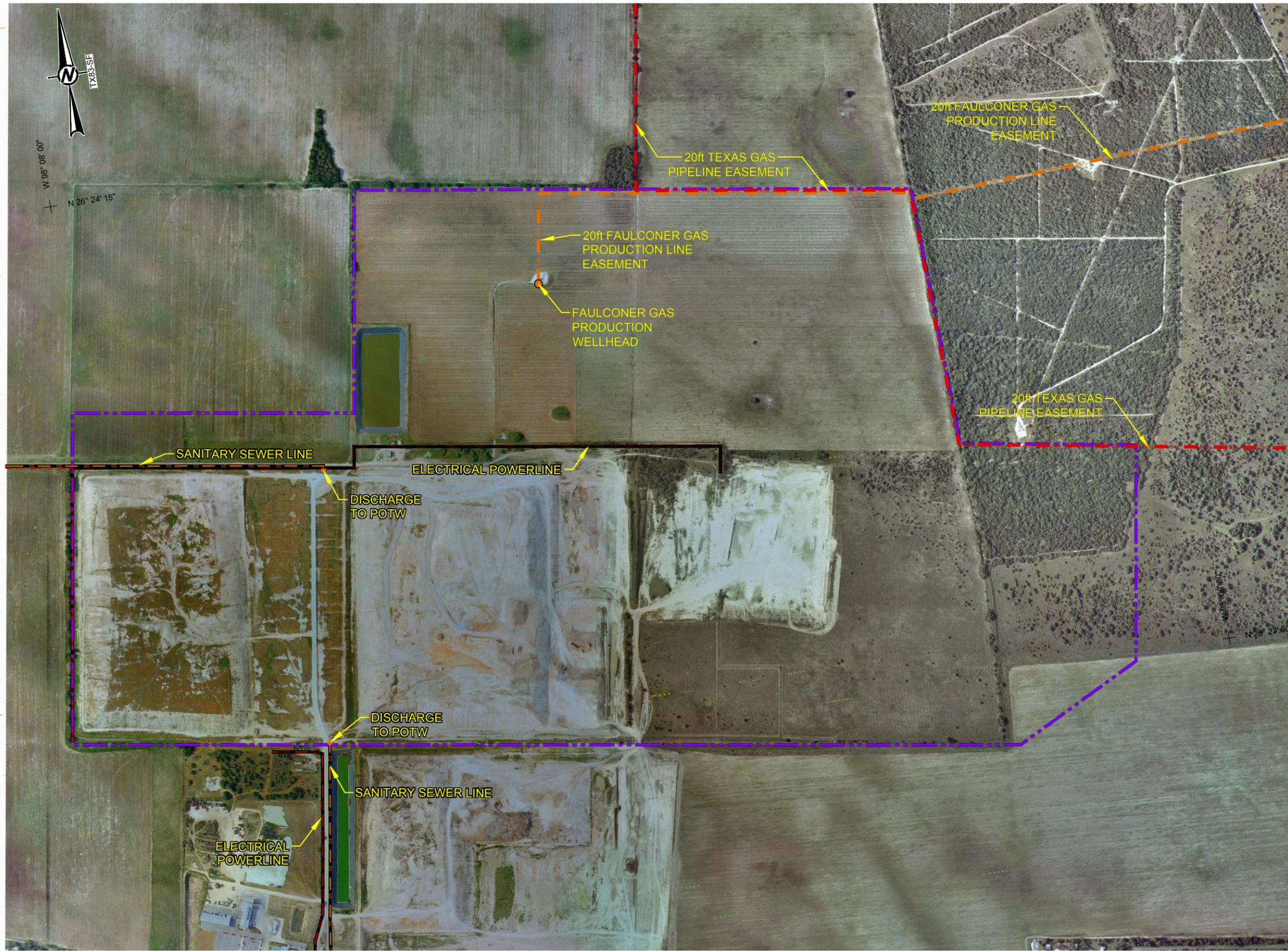
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**ZONING MAP**

PROJECT NO.	APPLICATION SECTION	REV.	5 of 30	FIGURE
1401491	II	1		II-5

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

	PERMIT BOUNDARY
	TEXAS GAS DEDICATED PIPELINE EASEMENT
	FAULKNER DEDICATED PIPELINE EASEMENT
	ELECTRICAL POWERLINE
	SANITARY SEWER LINE

- REFERENCE(S)**
1. POWERLINE LOCATION TAKEN FROM MAGIC VALLEY ELECTRIC COOPERATIVE, DATED 02/10/16 DELIVERED FROM <http://www.magicvalley.coop/map/outage>
  2. PIPELINE EASEMENT DEED RECORDS CAN BE FOUND IN PART IC OF THIS APPLICATION.
  3. CITY OWNED SANITARY SEWER LINE LOCATIONS PROVIDED BY THE CITY OF EDINBURG.

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	MGC	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI

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Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**DRAINAGE, PIPELINE, AND UTILITY EASEMENT LOCATION MAP**

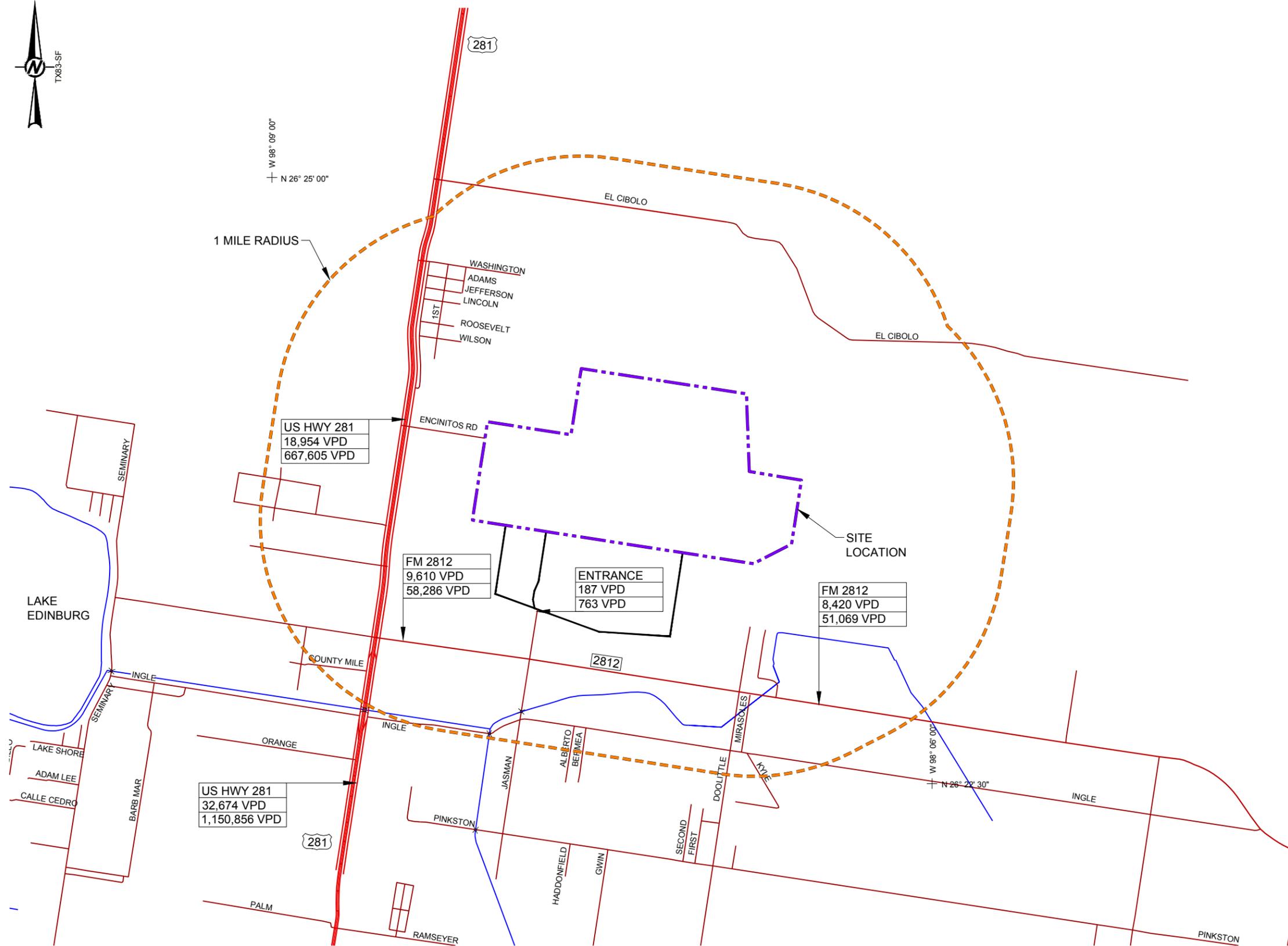
PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	6 of 30	FIGURE II-6
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



W 98° 09' 00"  
N 26° 25' 00"

1 MILE RADIUS



**LEGEND**

- PERMIT BOUNDARY
- 1 MILE RADIUS

**ENTRANCE**

ROADWAY	
187 VPD	EXISTING ANNUAL AVERAGE DAILY TRAFFIC (2013)
763 VPD	FUTURE ANNUAL AVERAGE DAILY TRAFFIC (2086)

**SURFACE TYPES**

US 281	ASPHALTIC CONCRETE PAVEMENT
FM 2812	CONCRETE AND ASPHALTIC CONCRETE PAVEMENT

**NOTE(S)**

- 2013 ANNUAL AVERAGE DAILY TRAFFIC COUNTS PROVIDED BY TXDOT.
- THE EXISTING TOTAL TRAFFIC GENERATED BY THE TYPE I LANDFILL IS BASED ON THE 2015 LANDFILL DATA.

**REFERENCE(S)**

BASE MAP TAKEN FROM TEXAS DEPARTMENT OF TRANSPORTATION, TXDOT URBAN FILE 2003 FOR HIDALGO COUNTY, DOWNLOADED FROM TNRIS.ORG

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	MGC	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI

SEAL

CHAD E. IRELAND  
99283  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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CITY OF EDINBURG  
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CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

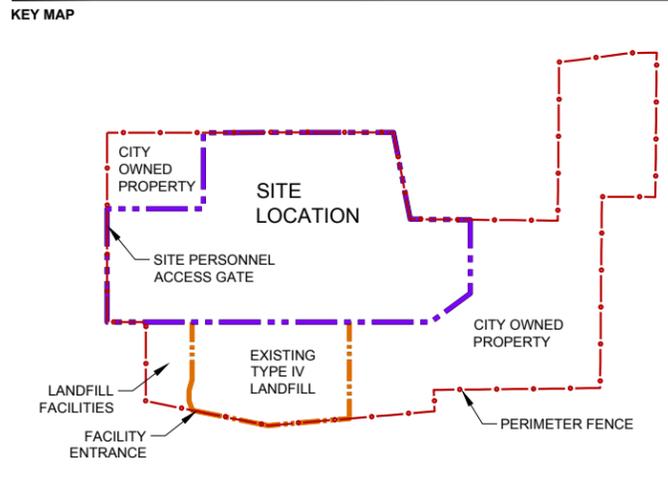
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**TRAFFIC VOLUMES**

PROJECT NO.	APPLICATION SECTION	REV.	15 of 30	FIGURE
1401491	II	1		II-11

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



- LEGEND**
- PERMIT BOUNDARY
  - TYPE IV LANDFILL TCEQ PERMIT MSW-2302 PERMIT BOUNDARY
  - PERIMETER FENCE
  - EXISTING STRUCTURES

- NOTE(S)**
1. SITE ENTRANCE IS LOCATED ON SOUTHWESTERN CORNER OF TYPE IV LANDFILL TCEQ PERMIT MSW-2302 ACCESSIBLE VIA JASMAN ROAD.
  2. SCALE HOUSE SERVES BOTH TYPE I AND TYPE IV LANDFILLS.
  3. ROADS TO FACILITY ARE ASPHALT.
  4. ACCESS TO FACILITY IS CONTROLLED BY A PERIMETER FENCE CURRENTLY INSTALLED AROUND CONTIGUOUS PROPERTIES OWNED BY THE CITY.

**REFERENCE(S)**  
AERIAL PHOTOGRAPH PROVIDED BY DALLAS AERIAL SURVEYS INC. DATED 07/24/14.

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI

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MANAGEMENT

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Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FACILITY ENTRANCE PLAN**

PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	20 of 30	FIGURE II-16
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B





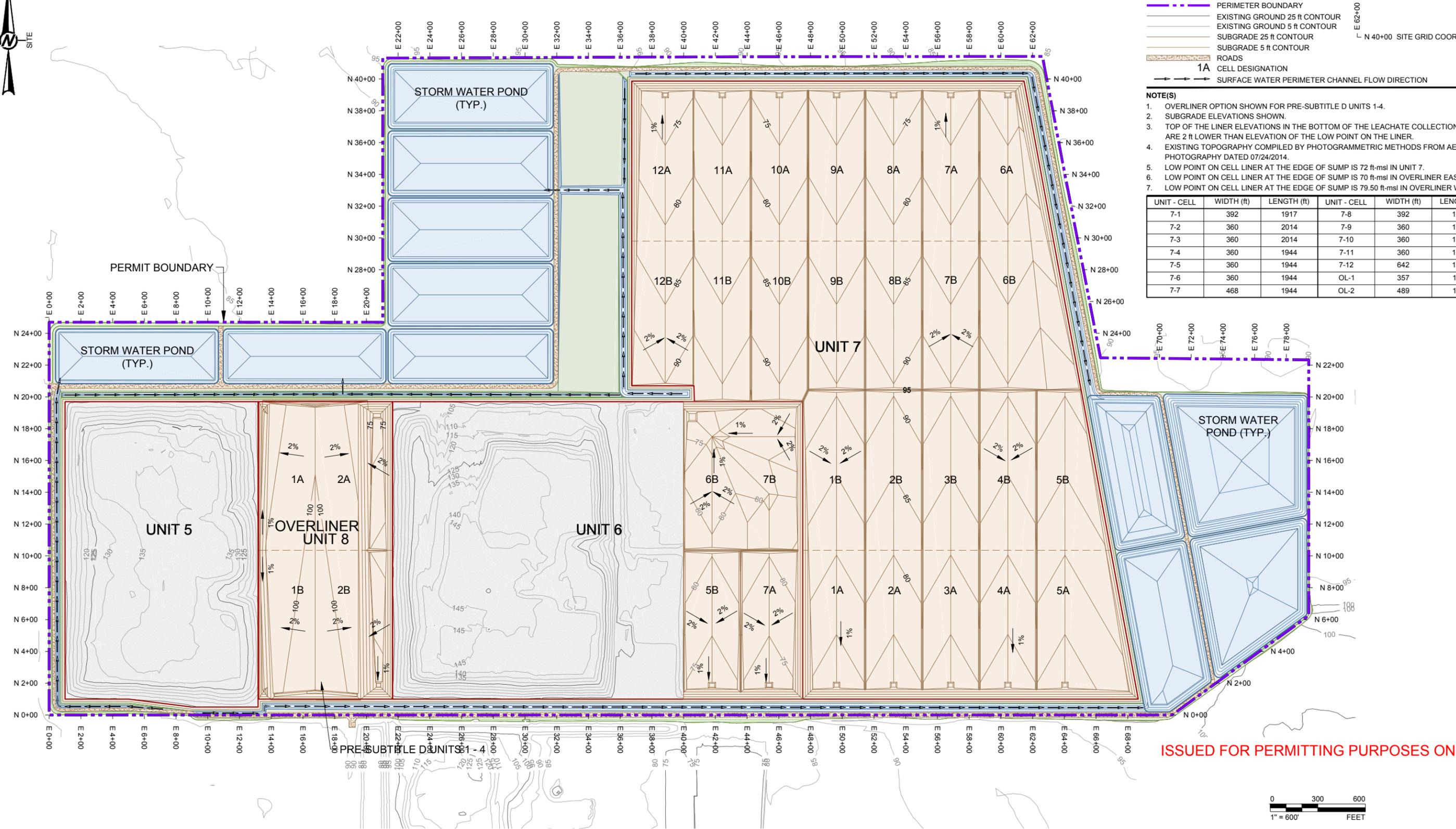
**LEGEND**

- PERIMETER BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- ROADS
- 1A CELL DESIGNATION
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

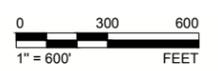
N 40+00  
E 62+00

- NOTE(S)**
1. OVERLINER OPTION SHOWN FOR PRE-SUBTITLE D UNITS 1-4.
  2. SUBGRADE ELEVATIONS SHOWN.
  3. TOP OF THE LINER ELEVATIONS IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS ARE 2 ft LOWER THAN ELEVATION OF THE LOW POINT ON THE LINER.
  4. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  5. LOW POINT ON CELL LINER AT THE EDGE OF SUMP IS 72 ft-msl IN UNIT 7.
  6. LOW POINT ON CELL LINER AT THE EDGE OF SUMP IS 70 ft-msl IN OVERLINER EAST.
  7. LOW POINT ON CELL LINER AT THE EDGE OF SUMP IS 79.50 ft-msl IN OVERLINER WEST.

UNIT - CELL	WIDTH (ft)	LENGTH (ft)	UNIT - CELL	WIDTH (ft)	LENGTH (ft)
7-1	392	1917	7-8	392	1944
7-2	360	2014	7-9	360	1944
7-3	360	2014	7-10	360	1944
7-4	360	1944	7-11	360	1944
7-5	360	1944	7-12	642	1944
7-6	360	1944	OL-1	357	1871
7-7	468	1944	OL-2	489	1871



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

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TEXAS REGISTRATION F-2578

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CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**SUBGRADE LAYOUT PLAN  
OVERLINER OPTION**

PROJECT NO.	APPLICATION SECTION	REV.	22 of 30	FIGURE
1401491	II	1		II-18A

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

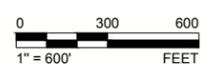
- PERIMETER BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- ROADS
- 1A CELL DESIGNATION
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

- NOTE(S)**
- UNIT 8 OPTION (WASTE EXCAVATION) SHOWN FOR PRE-SUBTITLE D UNITS 1-4.
  - SUBGRADE ELEVATIONS SHOWN.
  - TOP OF THE LINER ELEVATIONS IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS ARE 2 ft LOWER THAN ELEVATION OF THE LOW POINT ON THE LINER.
  - EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  - LOW POINT ON CELL LINER AT THE EDGE OF SUMP IS 72 ft-msl IN UNIT 7.
  - LOW POINT ON CELL LINER AT THE EDGE OF SUMP IS 70 ft-msl IN UNIT 8.

UNIT - CELL	WIDTH (ft)	LENGTH (ft)	UNIT - CELL	WIDTH (ft)	LENGTH (ft)
7-1	392	1917	7-8	392	1944
7-2	360	2014	7-9	360	1944
7-3	360	2014	7-10	360	1944
7-4	360	1944	7-11	360 <td 1944	
7-5	360	1944	7-12	642	1944
7-6	360	1944	8-1	423	1871
7-7	468	1944	8-2	423	1871



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

CHAD E. IRELAND  
99283  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**SUBGRADE LAYOUT PLAN  
UNIT 8 OPTION**

PROJECT NO.	APPLICATION SECTION	REV.	23 of 30	FIGURE
1401491	II	1		II-18B

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- GP-107 GAS PROBE
- MW-107 GROUNDWATER MONITORING WELL
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERM FLOW DIRECTION
- DOWNCHUTE FLOW DIRECTION

**NOTE(S)**

1. TOP OF FINAL COVER GRADES ARE SHOWN ON THIS SHEET.
2. TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. SEE PART III.2, SURFACE WATER DRAINAGE REPORT FOR DETAILS OF STORM WATER MANAGEMENT FEATURES.



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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

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0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI
	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI

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CHAD E. IRELAND  
99293  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

Golder Associates

HOUSTON OFFICE  
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PROJECT  
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PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

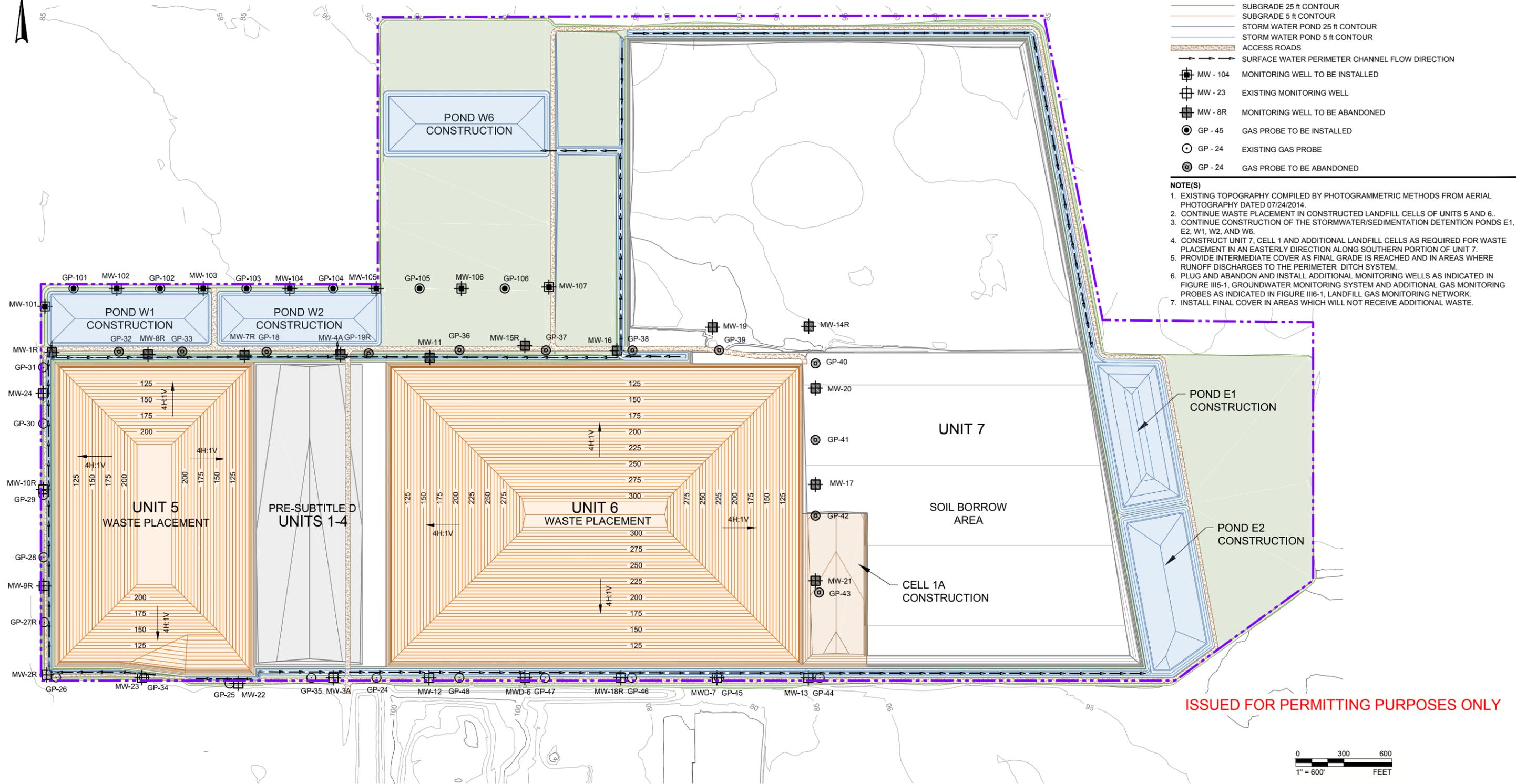
TITLE  
**FINAL CONTOUR MAP**

PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	24 of 30	FIGURE II-19
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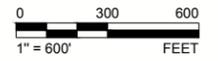


- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - TOP OF WASTE 25 ft CONTOUR
  - TOP OF WASTE 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ACCESS ROADS
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - MW - 104 MONITORING WELL TO BE INSTALLED
  - MW - 23 EXISTING MONITORING WELL
  - MW - 8R MONITORING WELL TO BE ABANDONED
  - GP - 45 GAS PROBE TO BE INSTALLED
  - GP - 24 EXISTING GAS PROBE
  - GP - 24 GAS PROBE TO BE ABANDONED

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. CONTINUE WASTE PLACEMENT IN CONSTRUCTED LANDFILL CELLS OF UNITS 5 AND 6.
  3. CONTINUE CONSTRUCTION OF THE STORMWATER/SEDIMENTATION DETENTION PONDS E1, E2, W1, W2, AND W6.
  4. CONSTRUCT UNIT 7, CELL 1 AND ADDITIONAL LANDFILL CELLS AS REQUIRED FOR WASTE PLACEMENT IN AN EASTERLY DIRECTION ALONG SOUTHERN PORTION OF UNIT 7.
  5. PROVIDE INTERMEDIATE COVER AS FINAL GRADE IS REACHED AND IN AREAS WHERE RUNOFF DISCHARGES TO THE PERIMETER DITCH SYSTEM.
  6. PLUG AND ABANDON AND INSTALL ADDITIONAL MONITORING WELLS AS INDICATED IN FIGURE III-5-1, GROUNDWATER MONITORING SYSTEM AND ADDITIONAL GAS MONITORING PROBES AS INDICATED IN FIGURE III-6-1, LANDFILL GAS MONITORING NETWORK.
  7. INSTALL FINAL COVER IN AREAS WHICH WILL NOT RECEIVE ADDITIONAL WASTE.



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0	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

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CHAD E. IRELAND  
99283  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**OPERATIONAL SEQUENCE I**

PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	25 of 30	FIGURE II-20A
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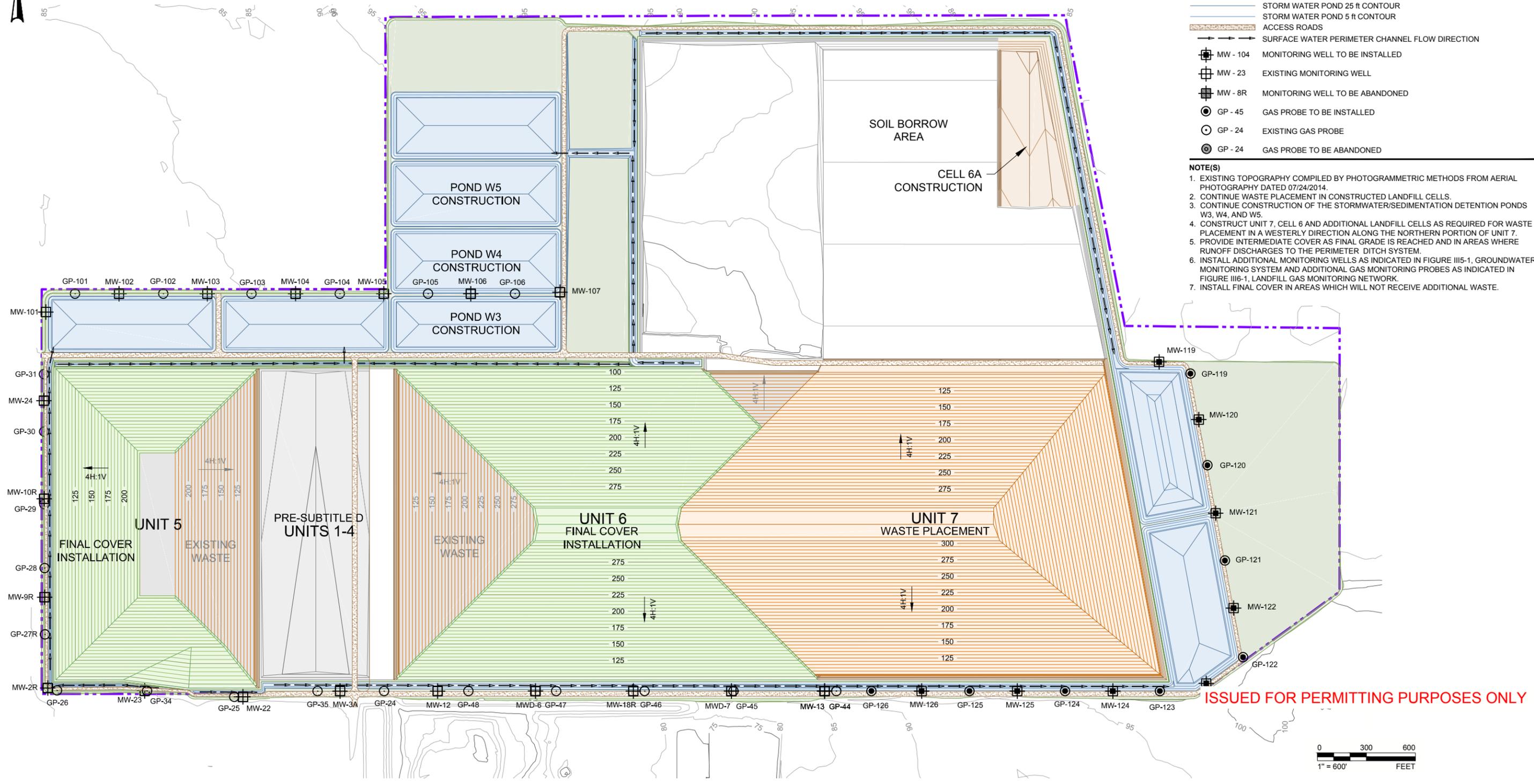
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



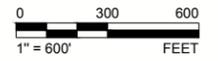
**LEGEND**

- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- TOP OF WASTE 25 ft CONTOUR
- TOP OF WASTE 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- STORM WATER POND 25 ft CONTOUR
- STORM WATER POND 5 ft CONTOUR
- ACCESS ROADS
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- MW - 104 MONITORING WELL TO BE INSTALLED
- MW - 23 EXISTING MONITORING WELL
- MW - 8R MONITORING WELL TO BE ABANDONED
- GP - 45 GAS PROBE TO BE INSTALLED
- GP - 24 EXISTING GAS PROBE
- GP - 24 GAS PROBE TO BE ABANDONED

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. CONTINUE WASTE PLACEMENT IN CONSTRUCTED LANDFILL CELLS.
  3. CONTINUE CONSTRUCTION OF THE STORMWATER/SEDIMENTATION DETENTION PONDS W3, W4, AND W5.
  4. CONSTRUCT UNIT 7, CELL 6 AND ADDITIONAL LANDFILL CELLS AS REQUIRED FOR WASTE PLACEMENT IN A WESTERLY DIRECTION ALONG THE NORTHERN PORTION OF UNIT 7.
  5. PROVIDE INTERMEDIATE COVER AS FINAL GRADE IS REACHED AND IN AREAS WHERE RUNOFF DISCHARGES TO THE PERIMETER DITCH SYSTEM.
  6. INSTALL ADDITIONAL MONITORING WELLS AS INDICATED IN FIGURE III-5-1, GROUNDWATER MONITORING SYSTEM AND ADDITIONAL GAS MONITORING PROBES AS INDICATED IN FIGURE III-6-1, LANDFILL GAS MONITORING NETWORK.
  7. INSTALL FINAL COVER IN AREAS WHICH WILL NOT RECEIVE ADDITIONAL WASTE.



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CLIENT

CONSULTANT

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
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[+1] (281) 821-6868  
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**OPERATIONAL SEQUENCE II**

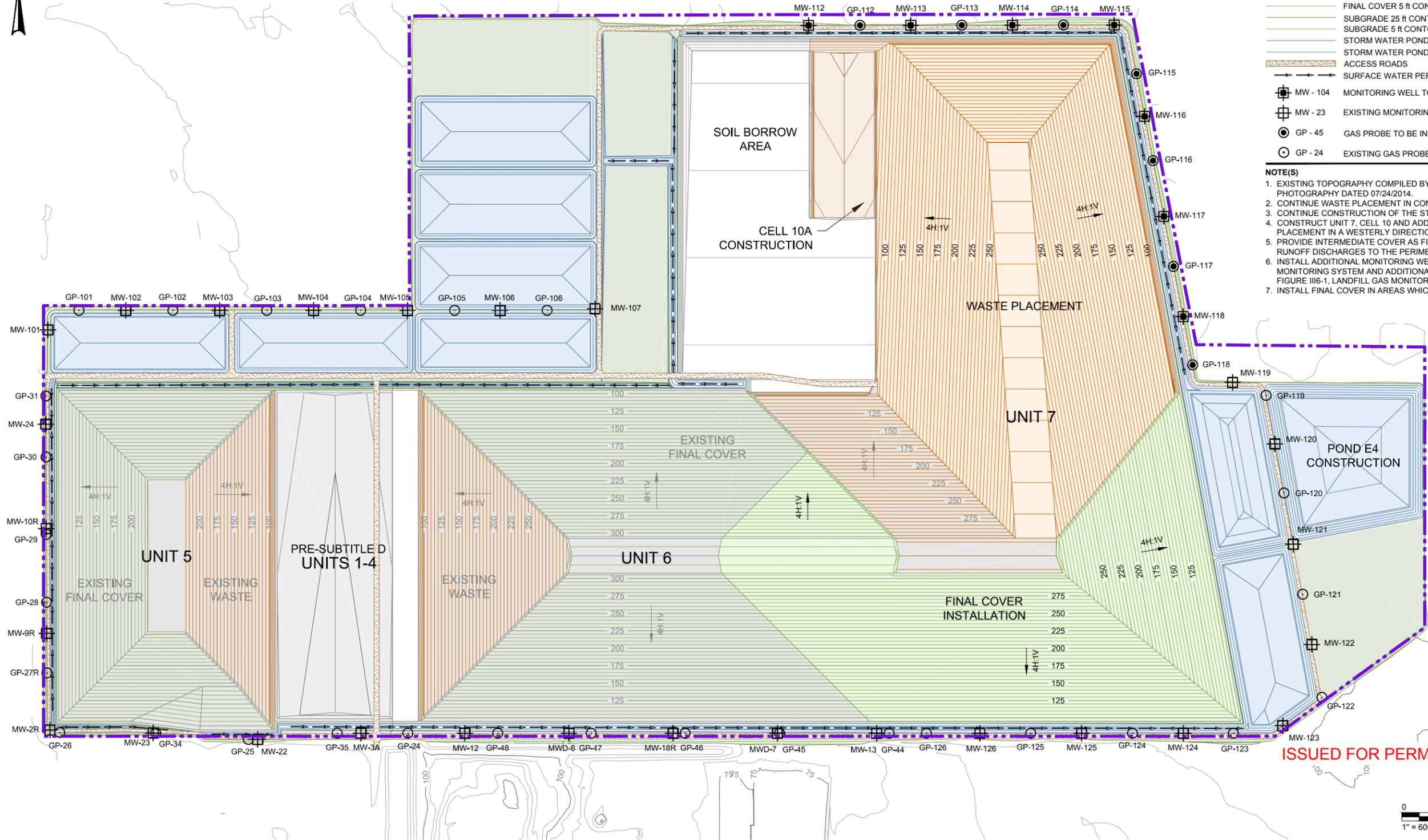
PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	26 of 30	FIGURE II-20B
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

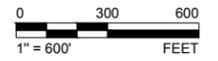


- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - TOP OF WASTE 25 ft CONTOUR
  - TOP OF WASTE 5 ft CONTOUR
  - FINAL COVER 25 ft CONTOUR
  - FINAL COVER 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ACCESS ROADS
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - MW - 104 MONITORING WELL TO BE INSTALLED
  - MW - 23 EXISTING MONITORING WELL
  - GP - 45 GAS PROBE TO BE INSTALLED
  - GP - 24 EXISTING GAS PROBE

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. CONTINUE WASTE PLACEMENT IN CONSTRUCTED LANDFILL CELLS.
  3. CONTINUE CONSTRUCTION OF THE STORMWATER/SEDIMENTATION DETENTION POND E4.
  4. CONSTRUCT UNIT 7, CELL 10 AND ADDITIONAL LANDFILL CELLS AS REQUIRED FOR WASTE PLACEMENT IN A WESTERLY DIRECTION ALONG THE NORTHERN PORTION OF UNIT 7.
  5. PROVIDE INTERMEDIATE COVER AS FINAL GRADE IS REACHED AND IN AREAS WHERE RUNOFF DISCHARGES TO THE PERIMETER DITCH SYSTEM.
  6. INSTALL ADDITIONAL MONITORING WELLS AS INDICATED IN FIGURE III-5-1, GROUNDWATER MONITORING SYSTEM AND ADDITIONAL GAS MONITORING PROBES AS INDICATED IN FIGURE III-6-1, LANDFILL GAS MONITORING NETWORK.
  7. INSTALL FINAL COVER IN AREAS WHICH WILL NOT RECEIVE ADDITIONAL WASTE.



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
0	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

CHAD E. IRELAND  
99283  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**OPERATIONAL SEQUENCE III**

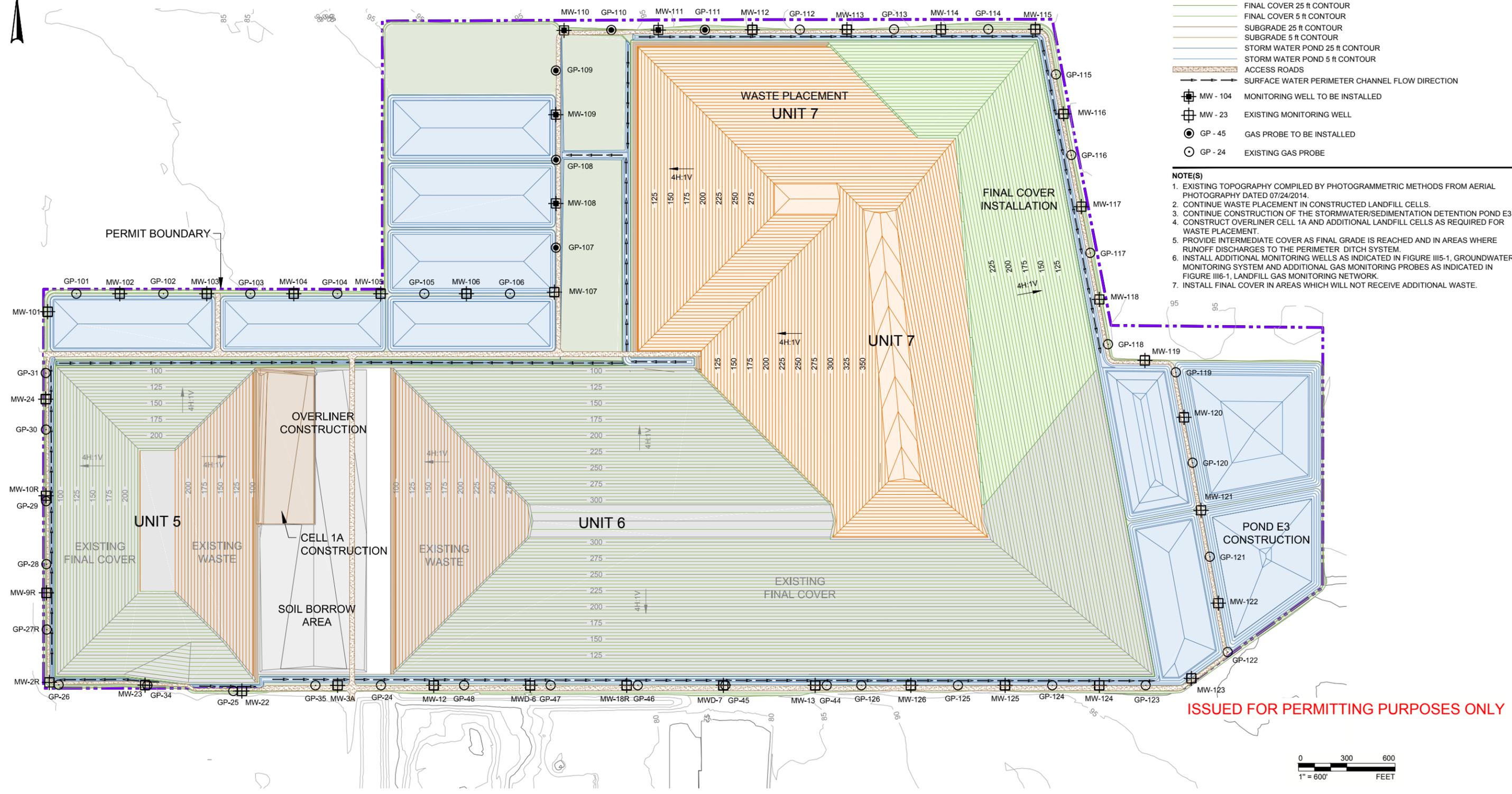
PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	27 of 30	FIGURE II-20C
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - TOP OF WASTE 25 ft CONTOUR
  - TOP OF WASTE 5 ft CONTOUR
  - FINAL COVER 25 ft CONTOUR
  - FINAL COVER 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ACCESS ROADS
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - MW - 104 MONITORING WELL TO BE INSTALLED
  - MW - 23 EXISTING MONITORING WELL
  - GP - 45 GAS PROBE TO BE INSTALLED
  - GP - 24 EXISTING GAS PROBE

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. CONTINUE WASTE PLACEMENT IN CONSTRUCTED LANDFILL CELLS.
  3. CONTINUE CONSTRUCTION OF THE STORMWATER/SEDIMENTATION DETENTION POND E3.
  4. CONSTRUCT OVERLINER CELL 1A AND ADDITIONAL LANDFILL CELLS AS REQUIRED FOR WASTE PLACEMENT.
  5. PROVIDE INTERMEDIATE COVER AS FINAL GRADE IS REACHED AND IN AREAS WHERE RUNOFF DISCHARGES TO THE PERIMETER DITCH SYSTEM.
  6. INSTALL ADDITIONAL MONITORING WELLS AS INDICATED IN FIGURE III-5-1, GROUNDWATER MONITORING SYSTEM AND ADDITIONAL GAS MONITORING PROBES AS INDICATED IN FIGURE III-6-1, LANDFILL GAS MONITORING NETWORK.
  7. INSTALL FINAL COVER IN AREAS WHICH WILL NOT RECEIVE ADDITIONAL WASTE.



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

CHAD E. IRELAND  
99283  
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CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

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HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**OPERATIONAL SEQUENCE IV OVERLINER OPTION**

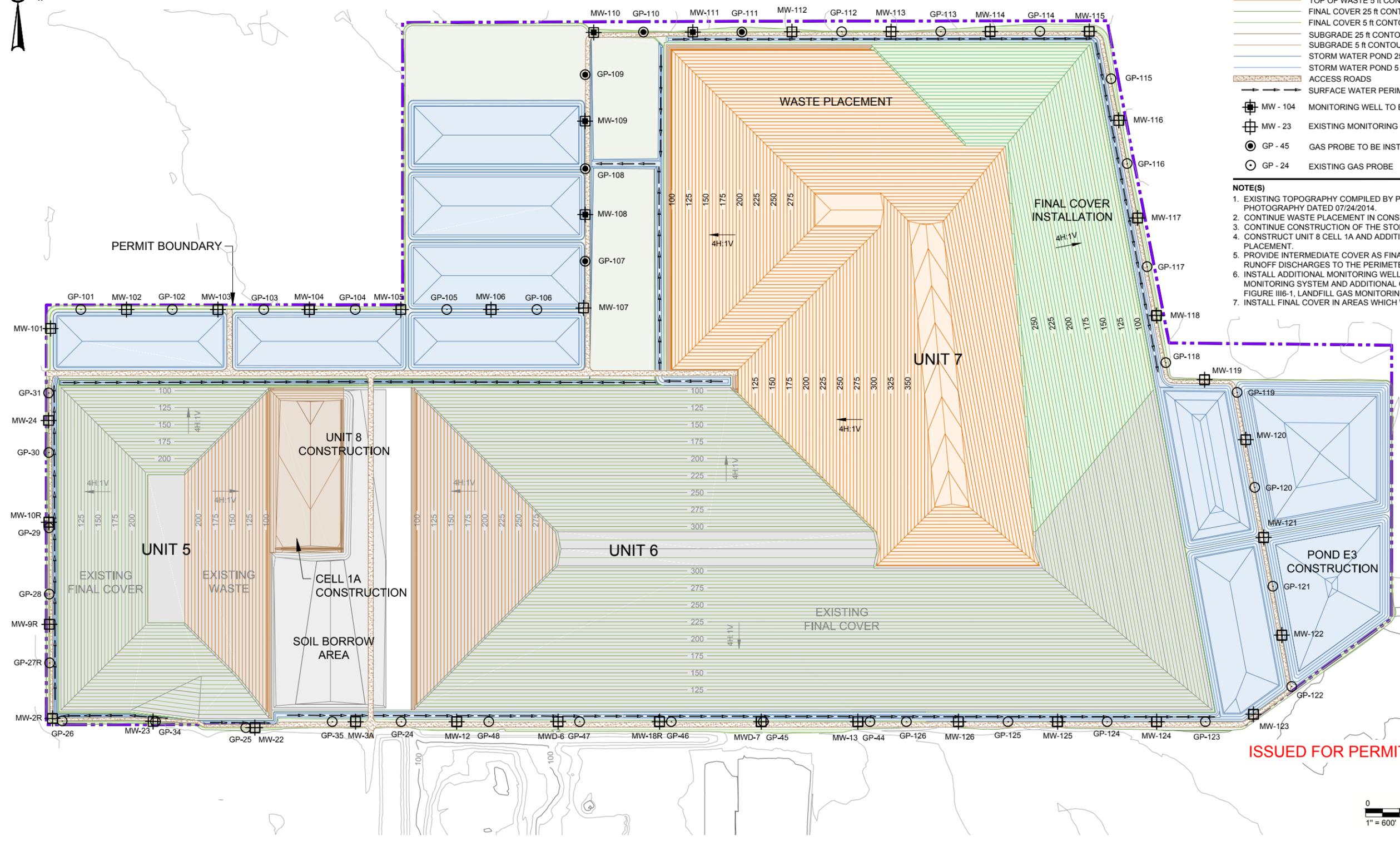
PROJECT NO. 1401491      APPLICATION SECTION II      REV. 1      28 of 30      FIGURE II-20D1

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

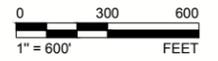


- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - TOP OF WASTE 25 ft CONTOUR
  - TOP OF WASTE 5 ft CONTOUR
  - FINAL COVER 25 ft CONTOUR
  - FINAL COVER 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ACCESS ROADS
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - ⊠ MW - 104 MONITORING WELL TO BE INSTALLED
  - ⊠ MW - 23 EXISTING MONITORING WELL
  - ⊙ GP - 45 GAS PROBE TO BE INSTALLED
  - ⊙ GP - 24 EXISTING GAS PROBE

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. CONTINUE WASTE PLACEMENT IN CONSTRUCTED LANDFILL CELLS.
  3. CONTINUE CONSTRUCTION OF THE STORMWATER/SEDIMENTATION DETENTION POND E3.
  4. CONSTRUCT UNIT 8 CELL 1A AND ADDITIONAL LANDFILL CELLS AS REQUIRED FOR WASTE PLACEMENT.
  5. PROVIDE INTERMEDIATE COVER AS FINAL GRADE IS REACHED AND IN AREAS WHERE RUNOFF DISCHARGES TO THE PERIMETER DITCH SYSTEM.
  6. INSTALL ADDITIONAL MONITORING WELLS AS INDICATED IN FIGURE III-5-1, GROUNDWATER MONITORING SYSTEM AND ADDITIONAL GAS MONITORING PROBES AS INDICATED IN FIGURE III-6-1, LANDFILL GAS MONITORING NETWORK.
  7. INSTALL FINAL COVER IN AREAS WHICH WILL NOT RECEIVE ADDITIONAL WASTE.



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

CHAD E. IRELAND  
99293  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
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HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**OPERATIONAL SEQUENCE IV UNIT 8 OPTION**

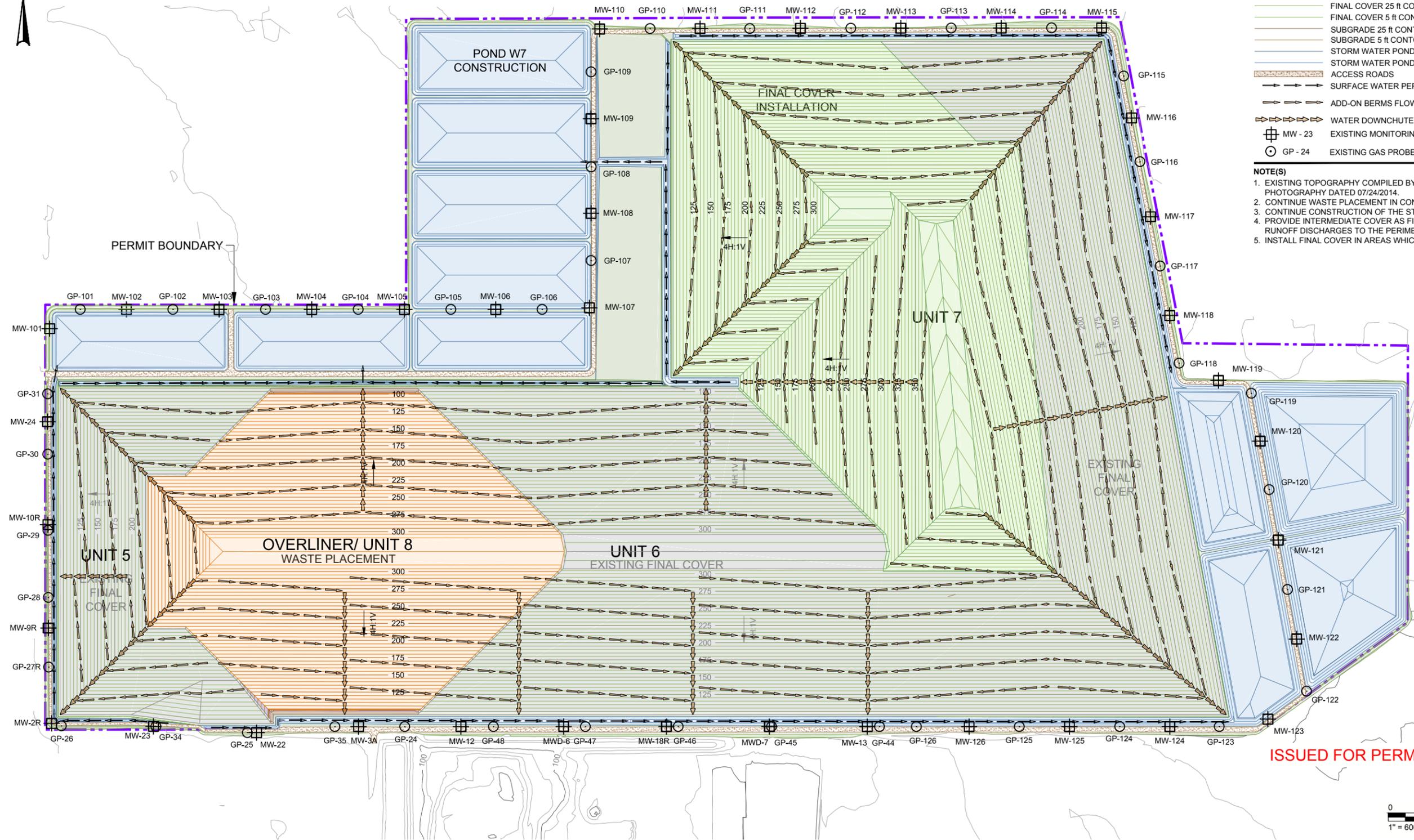
PROJECT NO. 1401491      APPLICATION SECTION II      REV. 1      29 of 30      FIGURE II-20D2

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

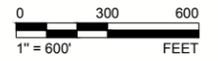


- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - TOP OF WASTE 25 ft CONTOUR
  - TOP OF WASTE 5 ft CONTOUR
  - FINAL COVER 25 ft CONTOUR
  - FINAL COVER 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ACCESS ROADS
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - ADD-ON BERMS FLOW DIRECTION
  - WATER DOWNCHUTE FLOW DIRECTION
  - MW - 23 EXISTING MONITORING WELL
  - GP - 24 EXISTING GAS PROBE

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. CONTINUE WASTE PLACEMENT IN CONSTRUCTED LANDFILL CELLS.
  3. CONTINUE CONSTRUCTION OF THE STORMWATER/SEDIMENTATION DETENTION POND W7.
  4. PROVIDE INTERMEDIATE COVER AS FINAL GRADE IS REACHED AND IN AREAS WHERE RUNOFF DISCHARGES TO THE PERIMETER DITCH SYSTEM.
  5. INSTALL FINAL COVER IN AREAS WHICH WILL NOT RECEIVE ADDITIONAL WASTE.



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

CHAD E. IRELAND  
99293  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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CITY OF EDINBURG  
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CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
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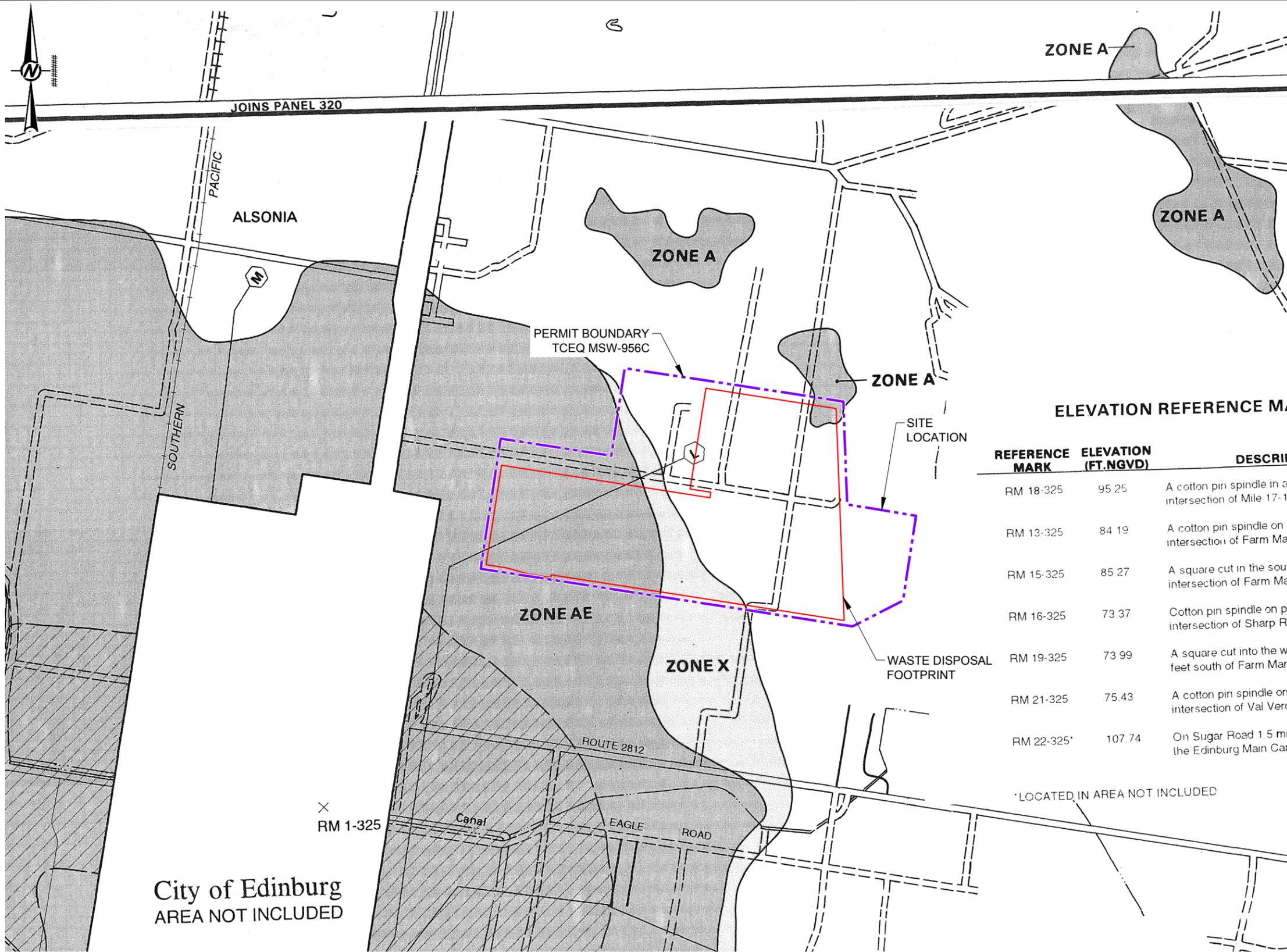
PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**OPERATIONAL SEQUENCE V**

PROJECT NO. 1401491	APPLICATION SECTION II	REV. 1	30 of 30	FIGURE II-20E
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

**APPENDIX IIC  
FLOODPLAINS**



**LEGEND**

**NATIONAL FLOOD INSURANCE PROGRAM**

**FIRM FLOOD INSURANCE RATE MAP**

HIDALGO COUNTY, TEXAS (UNINCORPORATED AREAS)

(SEE MAP INDEX FOR PANELS NOT PRINTED)

**COMMUNITY-PANEL NUMBER**  
480334 0325 D

**MAP REVISED:**  
JUNE 6, 2000

Federal Emergency Management Agency

**SPECIAL FLOOD HAZARD AREAS INUNDED BY 100-YEAR FLOOD**

**ZONE A** No base flood elevations determined.

**ZONE AE** Base flood elevations determined.

**ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); base flood elevations determined.

**ZONE AD** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding; velocities also determined.

**ZONE A99** To be protected from 100-year flood by Federal flood protection system under construction; no base flood elevations determined.

**ZONE V** Coastal flood with velocity hazard (wave action); no base flood elevations determined.

**ZONE VE** Coastal flood with velocity hazard (wave action); base flood elevations determined.

**FLOODWAY AREAS IN ZONE AE**

**OTHER FLOOD AREAS**

**ZONE X** Areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood.

**OTHER AREAS**

**ZONE X** Areas determined to be outside 500-year floodplain.

**ZONE D** Areas in which flood hazards are undetermined.

**UNDEVELOPED COASTAL BARRIERS†**

Identified 1983    Identified 1990    Otherwise Protected Areas

†Coastal barrier areas are normally located within or adjacent to special flood hazard areas.

Floodplain Boundary  
Floodway Boundary  
Zone D Boundary

Boundary Dividing Special Flood Hazard Zones, and Boundary Dividing Areas of Different Coastal Base Flood Elevations Within Special Flood Hazard Zones.

Base Flood Elevation Line; Elevation in Feet\*  
Cross Section Line  
Base Flood Elevation in Feet Where Uniform Within Zone\*  
Elevation Reference Mark  
River Mile

\*Referenced to the National Geodetic Vertical Datum of 1929

**ELEVATION REFERENCE MARKS**

REFERENCE MARK	ELEVATION (FT. NGVD)	DESCRIP
RM 18-325	95.25	A cotton pin spindle in a intersection of Mile 17-1
RM 13-325	84.19	A cotton pin spindle on a intersection of Farm Mar
RM 15-325	85.27	A square cut in the south intersection of Farm Mar
RM 16-325	73.37	Cotton pin spindle on pc intersection of Sharp R
RM 19-325	73.99	A square cut into the we feet south of Farm Mar
RM 21-325	75.43	A cotton pin spindle on intersection of Vai Verd
RM 22-325*	107.74	On Sugar Road 1.5 mil the Edinburg Main Can

\*LOCATED IN AREA NOT INCLUDED

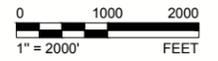
**LEGEND**

PERMIT BOUNDARY TCEQ MSW-956C  
WASTE DISPOSAL FOOTPRINT

**REFERENCE(S)**

- FLOOD INSURANCE RATE MAP TAKEN FROM FEMA FLOOD MAP SERVICE CENTER, DELIVERED IN PDF, <<http://msc.fema.gov/portal>> (ACCESSED JANUARY 2016)
- ZONE A SPECIAL FLOOD HAZARD AREA (SFHA) BOUNDARIES IMPACTING LANDFILL AREA ARE FROM QUALITY LEVEL 3 (Q3) FLOOD DATA PROVIDED BY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) ONLINE FLOOD MAPS, <<http://msc.fema.gov/portal>> (ACCESSED JANUARY 2016)

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	CEI	CGD
0	2017-10	RESPONSE TO FIRST NODs	CEI	TNB	CEI	CGD

SEAL

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TEXAS REGISTRATION F-2578

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CONSULTANT

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821 6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FEMA FLOOD INSURANCE RATE MAP**

PROJECT NO. 1401491	APPLICATION SECTION IIC	REV. 1	1 of 3	FIGURE IIC-1
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



NATIONAL FLOOD INSURANCE PROGRAM

## FIRM FLOOD INSURANCE RATE MAP

HIDALGO COUNTY, TEXAS (UNINCORPORATED AREAS)

(SEE MAP INDEX FOR PANELS NOT PRINTED)

**REVISED TO REFLECT LOMR DATED MAY 17, 2001**

COMMUNITY-PANEL NUMBER 480334 0325 D  
MAP REVISED: JUNE 6, 2000

Federal Emergency Management Agency

**LEGEND**

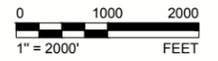
- SPECIAL FLOOD HAZARD AREAS INUNDED BY 100-YEAR FLOOD
- ZONE A No base flood elevations determined.
- ZONE AE Base flood elevations determined.
- ZONE AH Flood depths of 1 to 3 feet (usually areas of ponding); base flood elevations determined.
- ZONE AO Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding; velocities also determined.
- ZONE A99 To be protected from 100-year flood by Federal flood protection system under construction; no base flood elevations determined.
- ZONE V Coastal flood with velocity hazard (wave action); no base flood elevations determined.
- ZONE VE Coastal flood with velocity hazard (wave action); base flood elevations determined.
- FLOODWAY AREAS IN ZONE AE
- OTHER FLOOD AREAS
- ZONE X Areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood.
- OTHER AREAS
- ZONE X Areas determined to be outside 500-year flood plain.
- ZONE D Areas in which flood hazards are undetermined.
- UNDEVELOPED COASTAL BARRIERS
- Identified 1993
- Identified 1995
- Observed Impaired Area
- Coastal barrier areas are normally located within or adjacent to special flood hazard areas.
- Floodplain Boundary
- Floodway Boundary
- Zone D Boundary
- Boundary Dividing Special Flood Hazard Zones, and Boundary Dividing Areas of Different Coastal Base Flood Elevations Within Special Flood Hazard Zones.
- Base Flood Elevation line; Elevation in feet. \* 513
- Cross Section Line (EL 987)
- Base Flood Elevation in Feet Where Uniform Within Zone. \*
- BM S-00-11 Elevation Bench Mark (See notes below)
- M1.5 River Mile

\*Referenced to the National Geodetic Vertical Datum of 1929  
To determine elevation bench mark location and elevation, contact Hidalgo County Drainage District No. 1.  
Base Map is UTM, NAD83 Datum, Zone 14

**LEGEND**

- PERMIT BOUNDARY TCEQ MSW-956C
- PERMIT BOUNDARY TCEQ MSW-956B

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	CEI	CGD
0	2017-10	RESPONSE TO FIRST NODs	CEI	TNB	CEI	CGD

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TEXAS REGISTRATION F-2578

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CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

Golder Associates

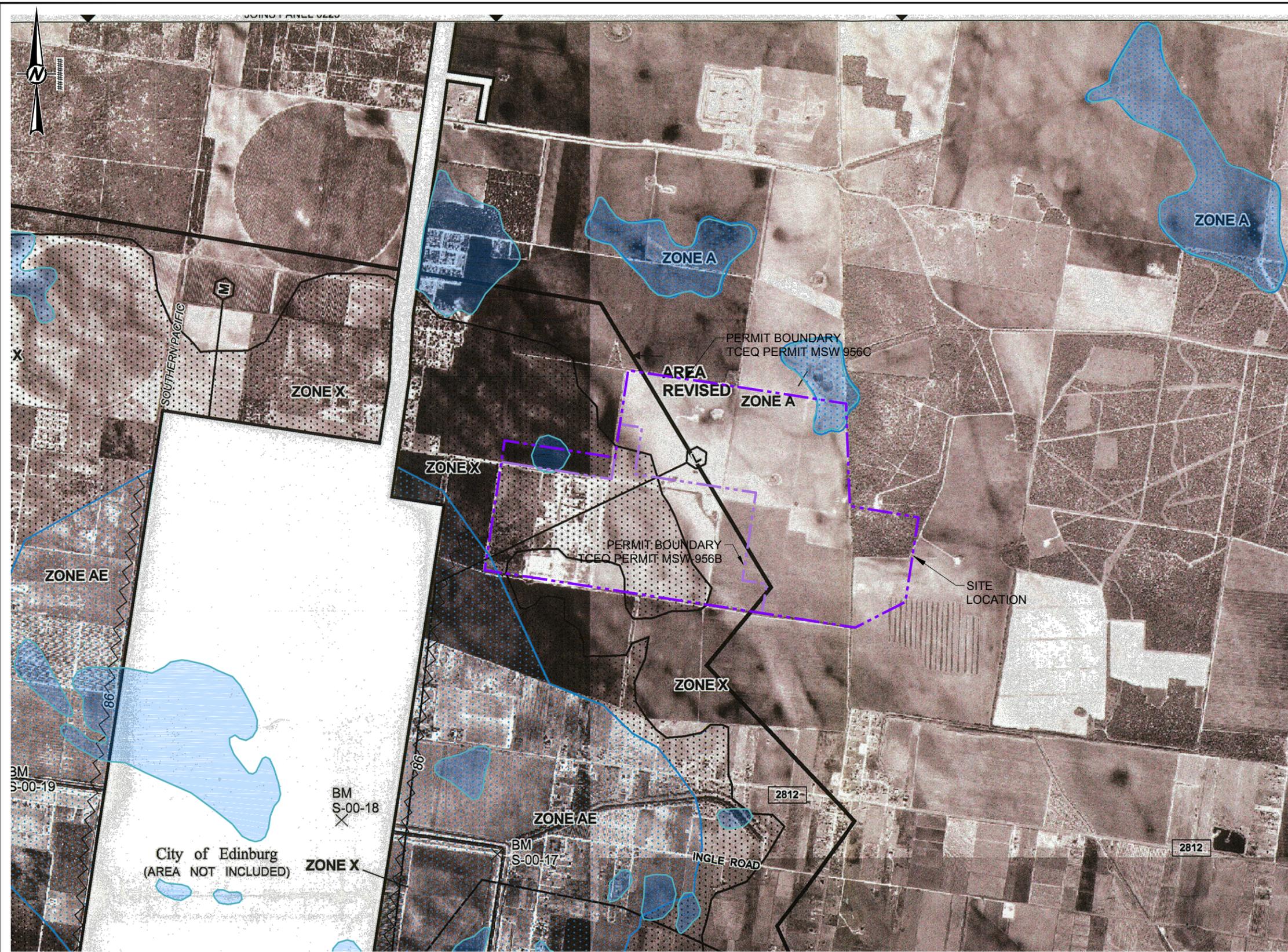
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**REVISED FIRM TO REFLECT LOMR**

PROJECT NO. 1401491	APPLICATION SECTION IIC	REV. 1	2 of 3	FIGURE IIC-2
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



NATIONAL FLOOD INSURANCE PROGRAM

## FIRM FLOOD INSURANCE RATE MAP

HIDALGO COUNTY, TEXAS (UNINCORPORATED AREAS)

(SEE MAP INDEX FOR PANELS NOT PRINTED)

**REVISED TO REFLECT LOMR DATED MAY 17, 2001**

COMMUNITY-PANEL NUMBER 480334 0325 D  
MAP REVISED: JUNE 6, 2000

Federal Emergency Management Agency

**LEGEND**

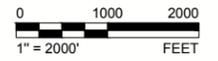
- SPECIAL FLOOD HAZARD AREAS INUNDED BY 100-YEAR FLOOD
- ZONE A No base flood elevations determined.
- ZONE AE Base flood elevations determined.
- ZONE AH Flood depths of 1 to 3 feet (usually areas of ponding); base flood elevations determined.
- ZONE AO Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding; velocities also determined.
- ZONE A99 To be protected from 100-year flood by Federal flood protection system under construction; no base flood elevations determined.
- ZONE V Coastal flood with velocity hazard (wave action); no base flood elevations determined.
- ZONE VE Coastal flood with velocity hazard (wave action); base flood elevations determined.
- FLOODWAY AREAS IN ZONE AE
- OTHER FLOOD AREAS
- ZONE X Areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood.
- OTHER AREAS
- ZONE X Areas determined to be outside 500-year flood plain.
- ZONE D Areas in which flood hazards are undetermined.
- UNDEVELOPED COASTAL BARRIERS
- Identified 1993
- Identified 1995
- Observed Improved Area
- Coastal barrier areas are normally located within or adjacent to special flood hazard areas.
- Floodplain Boundary
- Floodway Boundary
- Zone D Boundary
- Boundary Dividing Special Flood Hazard Zones, and Boundary Dividing Areas of Different Coastal Base Flood Elevations Within Special Flood Hazard Zones.
- Base Flood Elevation line; Elevation in feet. \* 513
- Cross Section Line
- Base Flood Elevation in Feet Where Uniform Within Zone. \* (EL 987)
- BM S-00-11 Elevation Bench Mark (See notes below)
- M1.5 River Mile

\*Referenced to the National Geodetic Vertical Datum of 1929  
To determine elevation bench mark location and elevation, contact Hidalgo County Drainage District No. 1.  
Base Map is UTM, NAD83 Datum, Zone 14

**LEGEND**

- PERMIT BOUNDARY TCEQ MSW-956C
- PERMIT BOUNDARY TCEQ MSW-956B
- ZONE A SPECIAL FLOOD HAZARD AREA (100YR-FLOOD ZONES)

**ISSUED FOR PERMITTING PURPOSES ONLY**



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0	2017-10	RESPONSE TO FIRST NODs	CEI	TNB	CEI	CGD

SEAL

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Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821 6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FEMA Q3 FLOOD DATA**

PROJECT NO. 1401491	APPLICATION SECTION IIC	REV. 1	3 of 3	FIGURE IIC-3
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

**APPENDIX IIC1**

**Floodplain Evaluation for TCEQ Permit MSW-956B**

**APPENDIX IIC1-1**  
**FLOODPLAIN CORRESPONDENCE FOR TCEQ PERMIT MSW-956B**



# Federal Emergency Management Agency

Washington, D.C. 20472

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

The Honorable Jose Eloy Pulido  
Hidalgo County Judge  
P.O. Box 1356  
Edinburg, TX 78540

IN REPLY REFER TO:

Case Number: 01-06-609F

Community: Hidalgo County, Texas  
(Unincorporated Areas)

Community No.: 480334

Panels Affected: 480334 0290 D, 0295 D,  
0325 D, 0350 C, 0450 C

Effective Date of  
This Revision: February 28, 2001

102-D

Dear Judge Pulido:

This Letter of Map Revision (LOMR) has revised the Flood Insurance Study (FIS) and Flood Insurance Rate Map (FIRM) for Hidalgo County, Texas. This revision is effective as of the date of this letter. Any requests to review or alter this determination should be made within 30 days and must be based on scientific or technical data.

A floodway designation is one tool for a community to use to regulate floodplain development. However, at your request, the floodway delineation has been removed from FIRM number 480334, panels 0290 D, 0295 D, 0325 D, 0350-C, and 0450 C, dated June 6, 2000. This removal is an acknowledgement of your coordination with the Federal Emergency Management Agency (FEMA) Region VI office to meet the minimum National Flood Insurance Program (NFIP) standards to include an accepted administrative process that will ensure safe development in the floodplain.

We will not print and distribute this LOMR to primary users, such as local insurance agents or mortgage lenders; instead, the community will serve as a repository for the new data. We encourage you to disseminate the information in this LOMR by preparing, for publication in your community's newspaper, a news release that describes the revision and explains how your community will provide the data and help interpret the NFIP maps. In that way, interested persons, such as property owners, insurance agents, and mortgage lenders, can benefit from the information.

We have made this determination pursuant to Section 206 of the Flood Disaster Protection Act of 1973 (P.L. 93-234) and in accordance with the National Flood Insurance Act of 1968, as amended (Title XIII of the Housing and Urban Development Act of 1968, P.L. 90-448), 42 U.S.C. 4001-4128, and 44 CFR Part 65. Pursuant to Section 1361 of the National Flood Insurance Act of 1968, as amended, communities participating in the NFIP are required to adopt and enforce floodplain management ordinances that meet or exceed minimum NFIP criteria. These criteria, including adoption of the FIS and FIRM, the modifications made by this LOMR, are the minimum requirements for continued NFIP participation and do not supersede more stringent State or local requirements to which the regulations apply.

If you have any questions regarding this LOMR, please contact Ms. Katie Paulson of my staff at 202-646-2585

Sincerely,



William R. Blanton, Jr., Project Officer  
Hazards Study Branch  
Mitigation Directorate

For: Matthew B. Miller, P.E., Chief  
Hazards Study Branch  
Mitigation Directorate

Enclosures

cc: The Honorable Ruben Hinojosa, U.S. House of Representatives  
The Honorable Solomon P. Ortiz, U.S. House of Representatives  
Mayor Joe Ochoa, City of Edinburg  
Commissioner Oscar Garza, Hidalgo County, Precinct 4  
Mr. Godfrey Garza, Jr., Hidalgo County Floodplain Coordinator

**MEMORANDUM OF AGREEMENT**  
**Between the Federal Emergency Management Agency**  
**And**  
**Hidalgo County, Texas**

This Memorandum of Agreement between the aforementioned parties pertains to the acceptance of administrative procedures for floodway removal and is specific to the five revised panels (FIRM number 480334, panels 0290D, 0295D, 0325D, 0350C, and 0450C) of Hidalgo County's Flood Insurance Rate Map (FIRM). Attached are the following:

1. Background and history of floodplain management
2. The County's floodplain management regulations
3. The County's subdivision rules
4. Floodplain management administrative procedures
5. The Letter of Map Revision (LOMR) dated February 28, 2001

In order to remove the floodway, as indicated in the attached LOMR, the County must fulfill its commitment as a participant in the National Flood Insurance Program (NFIP) and accept the administrative procedures to properly meet local floodplain management standards. In doing so, the County must provide the adequate resources to ensure the timely processing of floodplain development permits.

We agree to provide any additional programmatic support during this process. We are committed to work with the County on potential revisions to the FIRM.

IN WITNESS WHEREOF, each party has caused the Agreement to be executed by its duly authorized representatives on the following date:

Agreed on this date, February 28, 2001

  
\_\_\_\_\_  
Approved for  
Hidalgo County, Texas

  
\_\_\_\_\_  
Approved for the  
Federal Emergency Management Agency  
Region VI, Mitigation Division

**APPENDIX IIC1-2**

**Floodplain Location Restriction Certification for TCEQ Permit MSW-956B**

## FLOODPLAIN LOCATION RESTRICTION CERTIFICATION

The amendment of the City of Edinburg's Municipal Solid Waste (MSW) Permit to include a lateral expansion will not cause a violation of floodplain restrictions.

The plans for expansion of the landfill have been reviewed by the Hidalgo County Floodplain Administrator (HCFPA), the agency having jurisdiction. The Administrator issued a Floodplain Development Permit for the project. The floodplain boundary was recently revised by the Federal Emergency Management Administration (FEMA), by Letter of Map Revision, Dated February 28, 2001, and by Flood Insurance Rate Map (FIRM), Revised May 17, 2001. The revised conditions are less critical with respect to the facility than those depicted by the previous FIRM dated, June, 2000. A Floodplain Development Permit (now superseded) was also issued given the design and conditions of the June, 2000 FIRM.

A substantial portion of the site is located within Zone X of the map. Zone X is that area is subject to flooding of one foot or less in depth with the 100 year storm event. No portion of the facility encroaches on the designated floodway.

The facility is designed with ponds having capacity to retain the run-off from the 100-year, 24-hour storm event. The facility is also designed with run-on berms to protect the capacity of the ponds from run-on. The run-on berms are designed to be a minimum of one foot above the highest portion of the Zone X area that could receive run-on

The waste within the landfill is protected by massive earth berms that are surrounded by the ditches that transmit stormwater run-off to the ponds.

Southern Ecology Management, Inc.  
Mitch Hudgins, P.E.



**APPENDIX IIC2**  
**FLOODPLAIN EVALUATION FOR TCEQ PERMIT MSW-956C EXPANSION AREA**

**APPENDIX IIC2-1**  
**FEMA CLOMR-F REQUEST**



03/25/2016

1401491

LOMC Clearinghouse  
847 South Pickett Street  
Alexandria, VA 22304-4605

**RE: REQUEST FOR CLOMR-F  
PERMIT AMENDMENT APPLICATION  
EDINBURG REGIONAL DISPOSAL FACILITY  
HIDALGO COUNTY, TEXAS  
TCEQ PERMIT MSW-956C**

Dear Recipient:

The City of Edinburg is preparing a Permit Amendment Application, to submit to the Texas Commission on Environmental Quality (TCEQ) Solid Waste Permits Division proposing an expansion to the Edinburg Regional Disposal Facility's permit boundary from 254 acres (currently permitted under TCEQ Permit MSW-956B) to 603 acres (to be permitted as TCEQ Permit MSW-956C). The proposed waste disposal footprint and permit boundary are shown in Figure 1. The existing and proposed permit boundaries overlaying a 7.5 minute USGS quadrangle map are shown in Figure 2.

The proposed permit boundary for the Edinburg Regional Disposal Facility extends into two small unnamed ponding areas designated Special Flood Hazard Area (SFHA) Flood Zone A as shown in Figures 1, 3, and 5; the facility's design involves placement of fill in these two Zone A areas. In order to comply with current solid waste regulations 30 Texas Administrative Code (TAC) §330.61(m)(1) and 330.547(a) through (c), Golder Associates Inc., on behalf of the City of Edinburg, is requesting a Conditional Letter of Map Revision Based on the Placement of Fill (CLOMR-F). The CLOMR-F request has been initiated through FEMA's online Letter of Map Change (LOMC) system. This letter provides a brief description of the supporting documents being submitted with the online request for a CLOMR-F, Application I.D. 1463085163038 and describes how placement of fill in the Zone A areas in conjunction with the construction of stormwater structures allows the facility to prevent washout during a 100-year storm event while not affecting the floodplain's Base Flood Elevation (BFE).

## BASE FLOOD ELEVATION DETERMINATION

The Edinburg Regional Disposal Facility property is located in Hidalgo County, National Flood Insurance Program (NFIP) community number 480338. The Facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D, which was most recently revised by the Letter of Map Revision Based on Fill (LOMR-F) case number 03-06-153P in 2003. The SFHA changes made by LOMR-F 03-06-153P have not yet been incorporated into a FIRM revision and FEMA's National Flood Insurance Program (NFIP) National Flood Hazard Layer (NFHL) digital database does not yet contain high resolution flood hazard mapping data for Hidalgo County.

The most current SFHA delineations available are FEMA Quality Level 3 (Q3) Flood Data files. The source information section of the Q3 Flood Data metadata file lists a modification in 2005 confirming the Q3 incorporates the 2003 LOMR-F 03-06-153P map changes in the SFHA delineations. Figure 5 presents the current Q3 Flood Data Zone A delineations (provided by Texas Natural Resources Information System Data Support Team in January 2016) overlaying the unrevised effective FIRM panel, annotated to show where the property is located.

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**Golder Associates Inc.**  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA  
Tel: (281) 821-6868 Fax: (281) 821-6870 [www.golder.com](http://www.golder.com)



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FEMA's Q3 Flood Data Zone A delineation was used in the development of a BFE for this CLOMR-F. The 100-year BFE was determined to be 86 feet above mean sea level (ft-msl) using contour interpolation as described in FEMA's guide, Managing Floodplain Development in Approximate Zone A Areas.

## FACILITY DESIGN

The facility's stormwater management system will incorporate ponds with adequate capacity to hold all runoff, and there will be no offsite stormwater discharge except the insignificant runoff from the exterior slope of the access road berm. The landfill perimeter berms are designed to protect deposited waste from flooding. The diversion structures route stormwater run-off to the stormwater ponds along the perimeter of the facility and the access roads prevent run-on from entering the facility.

Figure 4 presents Sections A and B for profile views of the northeast Zone A SFHA and northwest Zone A SFHA, respectively. Section A shows that the proposed construction in the northeast Zone A SFHA includes the waste buttressed by a landfill perimeter berm, a facility stormwater perimeter channel, and a perimeter access road with a crest elevation of 95 ft-msl. Section B shows the waste buttressed by a landfill perimeter berm, a stormwater perimeter channel, a perimeter access road with a minimum elevation of 89 ft-msl, a stormwater pond, and a perimeter berm with a minimum elevation of 89 ft-msl, i.e. a 3-ft minimum freeboard is maintained above the 100-year design flood (86 ft-msl) in accordance with 30 TAC 330.307(b).

As discussed above, the facility will provide stormwater holding ponds. The proposed design will not restrict flow or adversely impact the storage area of the ponding areas.

## SUPPORTING DOCUMENTS

The following is a list of the figures attached to indicate the property location and FEMA's SFHAs:

- Figure 1 – Site Location Map with FEMA SFHA
- Figure 2 - 7.5 minute USGS Quadrangle Map Showing Facility Boundary
- Figure 3 – Facility Design with FEMA SFHA
- Figure 4 – Zone A Special Flood Hazard Areas
- Figure 5 – FEMA Flood Insurance Rate Map

The following is a list of the other supporting documents being submitted with the online request for a CLOMR-F, Application I.D. 1463085163038:

- Property deeds for areas involved in CLOMR-F
- Proposed permit boundary's surveyed metes and bounds
- Elevation form (Form 2)
- A signed community acknowledgement form (Form 3)
- A copy of a letter from the United States Department of the Interior Fish and Wildlife Service's "not likely to adversely affect" determination
- A copy of the effective FIRM, annotated to show the property's general location

## FOLLOW UP

After construction is completed certified as-built information will be submitted to FEMA for a Letter of Map Revision (LOMR) to be issued.

## CLOSING

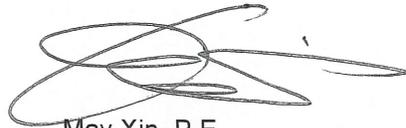
We appreciate your assistance with this request for a CLOMR-F. If further information is required by your department, please call the undersigned at (281) 821-6868.

Sincerely,

### GOLDER ASSOCIATES INC.



Chad E. Ireland, P.E.  
Senior Project Geological Engineer



May Xin, P.E.  
Senior Engineer

cc: Ramiro L. Gomez, Jr. City of Edinburg Department of Solid Waste

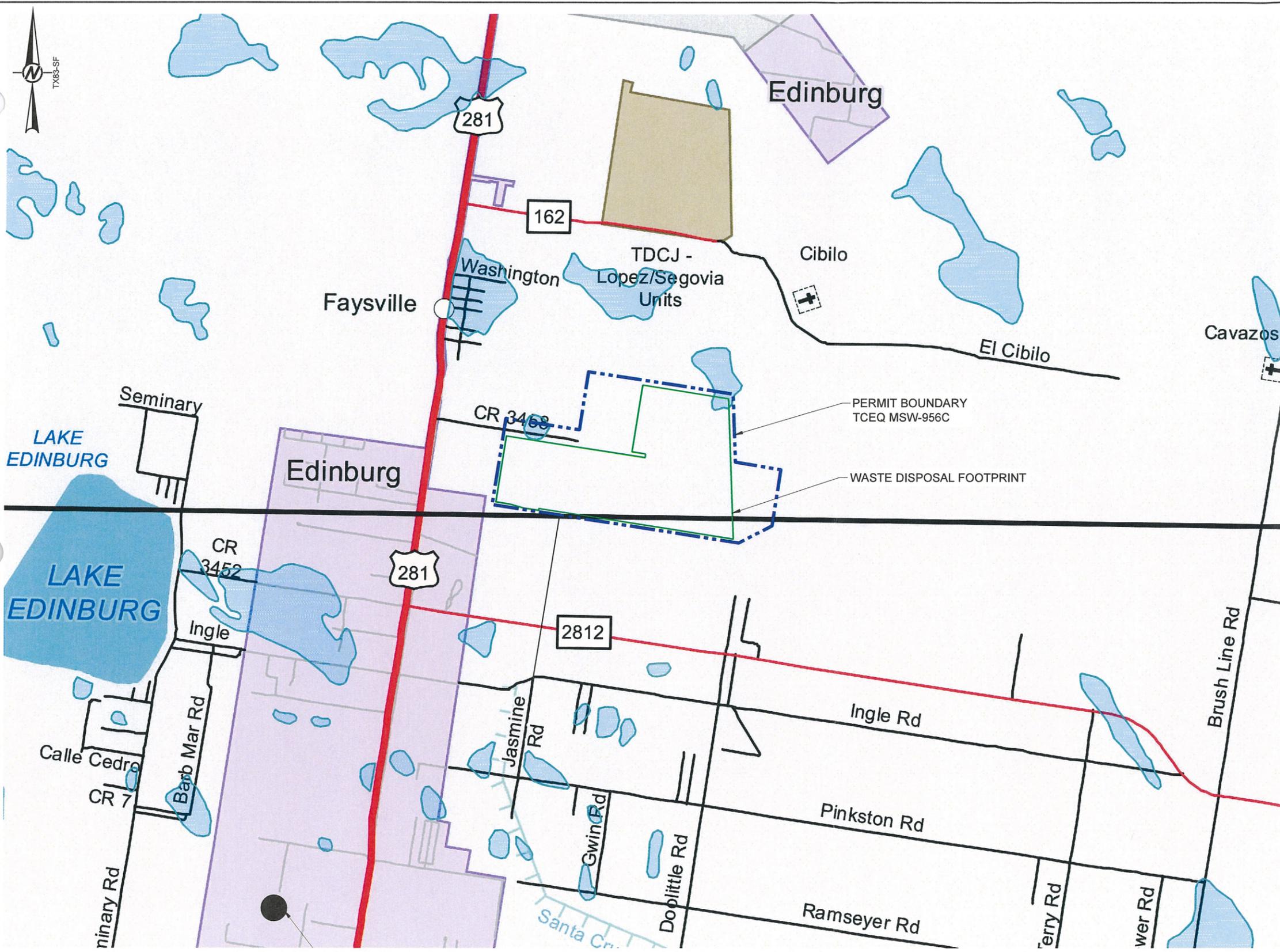
#### Attachments:

- Figures
  - Figure 1 – Site Location Map with FEMA SFHA
  - Figure 2 - 7.5 minute USGS Quadrangle Map Showing Facility Boundary
  - Figure 3 – Facility Design with FEMA SFHA
  - Figure 4 – Zone A Special Flood Hazard Areas
  - Figure 5 – FEMA Flood Insurance Rate Map
- Property Deeds
- Proposed Permit Boundary Metes and Bounds
- Elevation Form (Form 2)
- Community Acknowledgment Form (Form 3)
- USFWS Letter
- Copy of Effective FIRM

#### References:

FEMA. Managing Floodplain Development in Approximate Zone A Areas, FEMA, April 1995. Accessed February 2016. <https://www.fema.gov/media-library/assets/documents/1911>

**FIGURES**

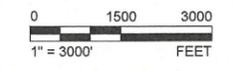


**LEGEND**

- PERMIT BOUNDARY
- WASTE DISPOSAL FOOTPRINT
- IH, BI
- US, BU, UA, UP
- SH, BS
- SL, SS, PR
- FM, BF, RM, RR, RE, RS, PA
- County Road
- City Street or other Non-County Maintained Road
- Railroad
- Incorporated City
- Unincorporated Community
- Airport
- Airport Runway
- School
- Military Installation
- Prison
- National or State Park
- Cemetery
- Dam
- County Line
- District Line
- Canal
- Flowing Stream
- Intermittent Stream
- River
- Gulf Intracoastal Waterway
- Other Body of Water
- ZONE A SPECIAL FLOOD HAZARD AREA (100YR-FLOOD ZONES)

- REFERENCE(S)**
- BASE MAP TAKEN FROM TEXAS DEPARTMENT OF TRANSPORTATION, COUNTY MAPBOOK 2012, PAGES 445 & 446, DELIVERED IN PDF, <http://www.dot.state.tx.us> (ACCESSED OCTOBER 2014)
  - ZONE A SPECIAL FLOOD HAZARD AREA (SFHA) BOUNDARIES IMPACTING LANDFILL AREA ARE FROM QUALITY LEVEL 3 (Q3) FLOOD DATA PROVIDED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) ONLINE FLOOD MAPS, <http://msc.fema.gov/portal> (ACCESSED JANUARY 2016)

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GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT  
CITY OF EDINBURG  
DEPARTMENT OF SOLID WASTE MANAGEMENT

CONSULTANT

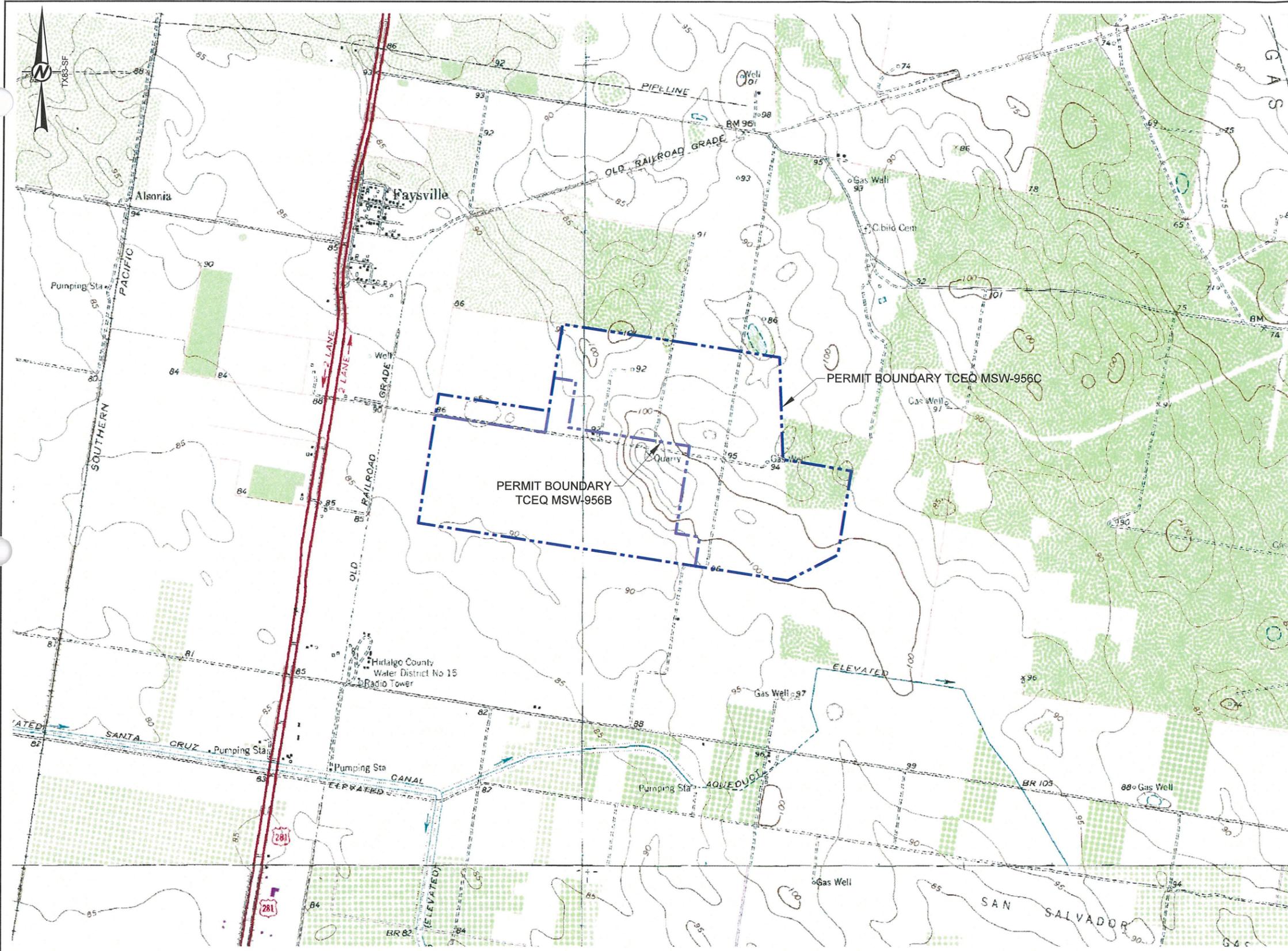
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**SITE LOCATION WITH FEMA SFHA**

PROJECT NO. 1401491    APPLICATION SECTION IIB5    REV. 0    1 of 5    FIGURE IIB5-1

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COUNTY MAPBOOK 2012 LEGEND

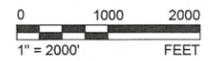
Railroad Features	
Railroad	
Road Features	
Expressway	
Secondary Hwy	
Ramp	
Local Connector	
Local Road	
Contour Features	
Index	
Intermediate	
Supplemental	
Depression Index	
Depression Intermediate	
Depression Supplemental	

LEGEND

	PERMIT BOUNDARY TCEQ MSW-956C
	PERMIT BOUNDARY TCEQ MSW-956B

REFERENCE(S)  
 BASE MAP INITIALLY DEVELOPED BY THE UNITED STATES GEOLOGICAL SURVEY (USGS) AND ENHANCED BY TEXAS NATURAL RESOURCE INFORMATION SYSTEM (TNIS), PUBLICATION DATE: AUGUST 20, 1996, DELIVERED IN A DIGITAL RASTER GRAPHIC (DRG) (ACCESSED JUNE 2014 FOR LA BLANCA AND EDINBURG, ACCESSED FEBRUARY 2013 FOR HARGILL AND FAYSVILLE)

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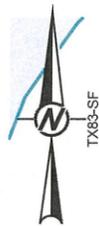
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 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**7.5 MINUTE USGS QUADRANGLE MAP SHOWING FACILITY BOUNDARY**

PROJECT NO. 1401491	APPLICATION SECTION IIB5	REV. 0	2 of 5	FIGURE IIB5-2
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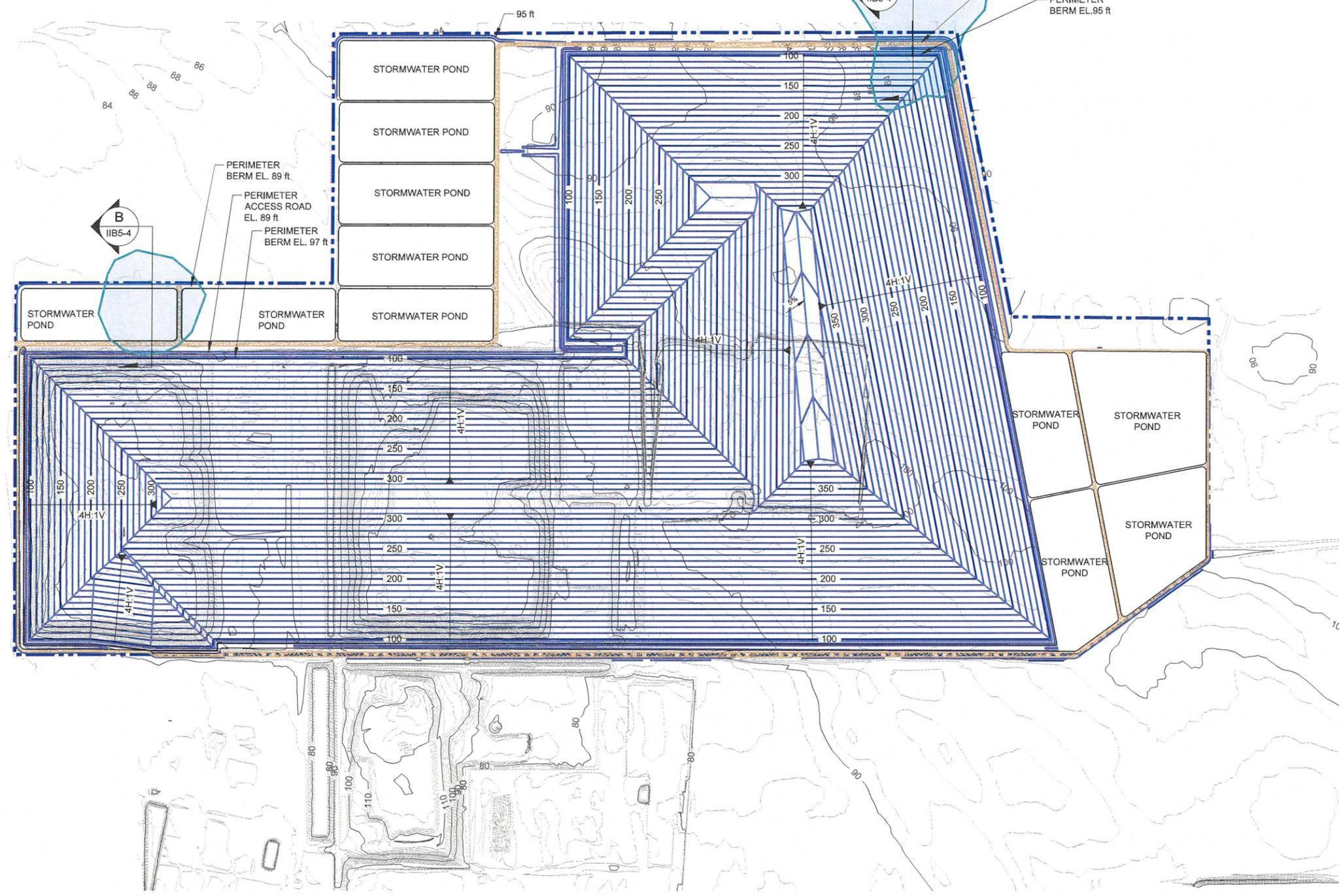


**LEGEND**

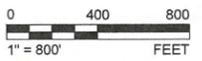
- PERMIT BOUNDARY
- WASTE DISPOSAL FOOTPRINT
- ZONE A SPECIAL FLOOD HAZARD AREA (100YR-FLOOD ZONES)
- PROPOSED ROAD
- PROPOSED FINAL GRADES MAJOR CONTOURS
- PROPOSED FINAL GRADES MINOR CONTOURS
- EXISTING GROUND 10 ft CONTOUR
- EXISTING GROUND 2 ft CONTOUR

**REFERENCE(S)**

1. ZONE A SPECIAL FLOOD HAZARD AREA (SFHA) BOUNDARIES IMPACTING LANDFILL AREA ARE FROM QUALITY LEVEL 3 (Q3) FLOOD DATA PROVIDED BY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) ONLINE FLOOD MAPS, <<http://msc.fema.gov/portal>> (ACCESSED JANUARY 2016)



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CHAD E. IRELAND  
99283  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT  
CITY OF EDINBURG  
DEPARTMENT OF SOLID WASTE MANAGEMENT

CONSULTANT

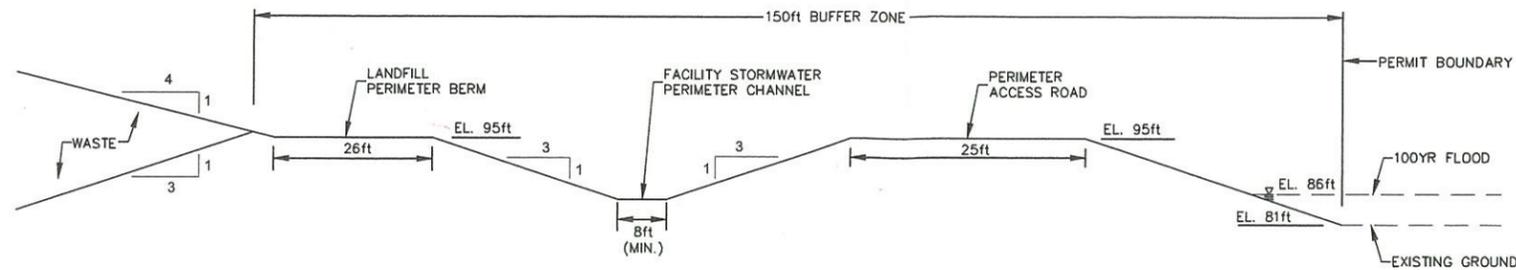
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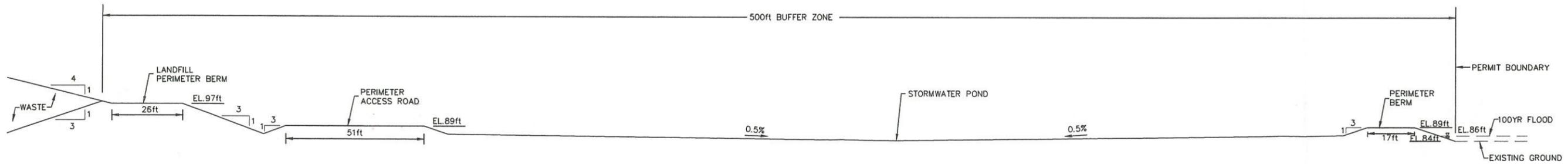
TITLE  
**FACILITY DESIGN WITH FEMA SFHA**

PROJECT NO. 1401491	APPLICATION SECTION IIB5	REV. 0	3 of 5	FIGURE IIB5-3
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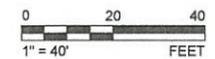
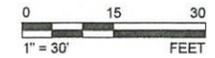


SCALE 1" = 30' **A** ZONE A SPECIAL FLOOD HAZARD AREA  
IIB5-4



SCALE 1" = 40' **B** ZONE A SPECIAL FLOOD HAZARD AREA  
IIB5-4

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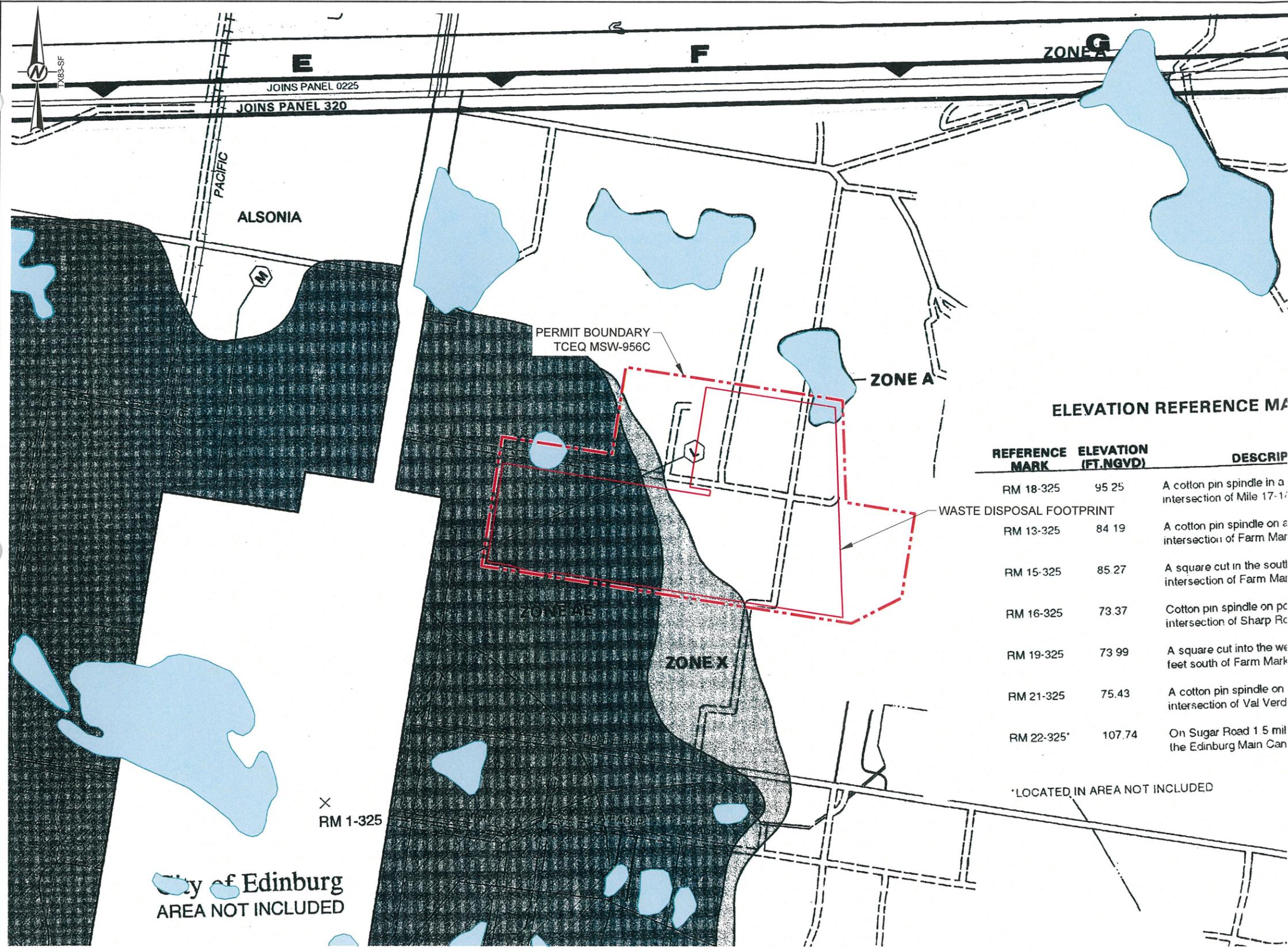
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TITLE  
**ZONE A SPECIAL FLOOD HAZARD AREA**

PROJECT NO. 1401491 APPLICATION SECTION IIB REV. 0 4 of 5 FIGURE IIB5-4

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

**NATIONAL FLOOD INSURANCE PROGRAM**

**FIRM FLOOD INSURANCE RATE MAP**

**HIDALGO COUNTY, TEXAS (UNINCORPORATED AREAS)**

(SEE MAP INDEX FOR PANELS NOT PRINTED)

**COMMUNITY-PANEL NUMBER 480334 0325 D**

**MAP REVISED: JUNE 6, 2000**

Federal Emergency Management Agency

**SPECIAL FLOOD HAZARD AREAS INUNDATED BY 100-YEAR FLOOD**

- ZONE A** No base flood elevations determined.
- ZONE AE** Base flood elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); base flood elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding; velocities also determined.
- ZONE ABB** To be protected from 100-year flood by Federal flood protection system under construction; no base flood elevations determined.
- ZONE V** Coastal flood with velocity hazard (wave action); no base flood elevations determined.
- ZONE VE** Coastal flood with velocity hazard (wave action); base flood elevations determined.

**FLOODWAY AREAS IN ZONE AE**

**OTHER FLOOD AREAS**

- ZONE X** Areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood.
- OTHER AREAS ZONE X** Areas determined to be outside 500-year floodplain.
- ZONE D** Areas in which flood hazards are undetermined.

**UNDEVELOPED COASTAL BARRIERS†**

- Identified 1983
- Identified 1990
- Otherwise Protected Areas

†Coastal barrier areas are normally located within or adjacent to special flood hazard areas.

- Floodplain Boundary
- Floodway Boundary
- Zone D Boundary
- Boundary Dividing Special Flood Hazard Zones and Boundary Dividing Areas of Different Coastal Base Flood Elevations Within Special Flood Hazard Zones.
- Base Flood Elevation Line; Elevation in Feet\*
- Cross Section Line
- Base Flood Elevation in Feet Where Uniform Within Zone\*
- RM 7<sub>x</sub> Elevation Reference Mark
- RM 1.5 River Mile

\*Referenced to the National Geodetic Vertical Datum of 1988

ZONE A SPECIAL FLOOD HAZARD AREA (100YR-FLOOD ZONES)

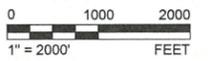
**ELEVATION REFERENCE MARK**

REFERENCE MARK	ELEVATION (FT. NGVD)	DESCRIP
RM 18-325	95.25	A cotton pin spindle in a intersection of Mile 17-1/2
RM 13-325	84.19	A cotton pin spindle on a intersection of Farm Mar
RM 15-325	85.27	A square cut in the south intersection of Farm Mar
RM 16-325	73.37	Cotton pin spindle on pc intersection of Sharp Rd
RM 19-325	73.99	A square cut into the west feet south of Farm Mar
RM 21-325	75.43	A cotton pin spindle on intersection of Val Verd
RM 22-325*	107.74	On Sugar Road 1.5 mile the Edinburg Main Can

\*LOCATED IN AREA NOT INCLUDED

- REFERENCE(S)**
- FLOOD INSURANCE RATE MAP TAKEN FROM FEMA FLOOD MAP SERVICE CENTER, DELIVERED IN PDF. <<http://msc.fema.gov/portal>> (ACCESSED JANUARY 2016)
  - ZONE A SPECIAL FLOOD HAZARD AREA (SFHA) BOUNDARIES IMPACTING LANDFILL AREA ARE FROM QUALITY LEVEL 3 (Q3) FLOOD DATA PROVIDED BY FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) ONLINE FLOOD MAPS, <<http://msc.fema.gov/portal>> (ACCESSED JANUARY 2016)

**ISSUED FOR PERMITTING PURPOSES ONLY**



Path: \\nouation\drafting\2014\11-14\City of Edinburg\PRODUCTION - Permit Amendment Application | File Name: 1401491A1E7.dwg

0	2016-03-24	ISSUED FOR PERMITTING PURPOSES ONLY	AGM	CEI	MX	CEI
REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED

SEAL

CHAD E. IRELAND  
99293  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT  
CITY OF EDINBURG  
DEPARTMENT OF SOLID WASTE MANAGEMENT

CONSULTANT

**Golder Associates**

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
(+1) (281) 821 6868  
[www.golder.com](http://www.golder.com)

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FEMA FLOOD INSURANCE RATE MAP**

PROJECT NO.	APPLICATION SECTION	REV.	5 of 5	FIGURE
1401491	IIB5	0		IIB5-5

1" IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI

Online Letter of Map Change

LOMC Application

Application ID: 1463085163038	<b>Amendment</b>
-------------------------------	------------------

**Amendment Review**

**Property Information Form**

Letter of Map Amendment Type: CLOMR-F

**Fill Section**

Has fill been placed on your property to raise ground that was previously below the BFE? No  
 When was fill placed?  
 Will fill be placed on your property to raise ground that is below the BFE? Yes  
 When will fill be placed? 03/2017

**Street Address of Property**

Address	Legal Description								
Edinburg Regional Disposal Facility 8601 North Jasman Road, Block 43, Lot 7 Edinburg, TX 78541	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;"><b>Lot:</b></td> <td style="text-align: center;">7</td> </tr> <tr> <td><b>Block/Section:</b></td> <td style="text-align: center;">43</td> </tr> <tr> <td><b>Subdivision:</b></td> <td>Citrus Fruit Development Company Subdivision</td> </tr> <tr> <td><b>Property Description:</b></td> <td>City of Edinburg landfill permit boundary</td> </tr> </table>	<b>Lot:</b>	7	<b>Block/Section:</b>	43	<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision	<b>Property Description:</b>	City of Edinburg landfill permit boundary
<b>Lot:</b>	7								
<b>Block/Section:</b>	43								
<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision								
<b>Property Description:</b>	City of Edinburg landfill permit boundary								
Edinburg Regional Disposal Facility 8601 North Jasman Road, Block 43, Lot 8 Edinburg, TX 78541	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;"><b>Lot:</b></td> <td style="text-align: center;">8</td> </tr> <tr> <td><b>Block/Section:</b></td> <td style="text-align: center;">43</td> </tr> <tr> <td><b>Subdivision:</b></td> <td>Citrus Fruit Development Company Subdivision</td> </tr> <tr> <td><b>Property Description:</b></td> <td>City of Edinburg landfill permit boundary</td> </tr> </table>	<b>Lot:</b>	8	<b>Block/Section:</b>	43	<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision	<b>Property Description:</b>	City of Edinburg landfill permit boundary
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<b>Block/Section:</b>	43								
<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision								
<b>Property Description:</b>	City of Edinburg landfill permit boundary								
Edinburg Regional Disposal Facility 8601 North Jasman Road, Block 41, Lot 13 Edinburg, TX 78541	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;"><b>Lot:</b></td> <td style="text-align: center;">13</td> </tr> <tr> <td><b>Block/Section:</b></td> <td style="text-align: center;">41</td> </tr> <tr> <td><b>Subdivision:</b></td> <td>Citrus Fruit Development Company Subdivision</td> </tr> </table>	<b>Lot:</b>	13	<b>Block/Section:</b>	41	<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision		
<b>Lot:</b>	13								
<b>Block/Section:</b>	41								
<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision								

Address	Legal Description								
	<table border="1"> <tr> <td data-bbox="932 205 1089 260"><b>Property Description:</b></td> <td data-bbox="1127 205 1224 281">City of Edinburg landfill</td> </tr> </table>	<b>Property Description:</b>	City of Edinburg landfill						
<b>Property Description:</b>	City of Edinburg landfill								
<p>Edinburg Regional Disposal Facility 8601 North Jasman Road, Block 41, Lot 14 Edinburg, TX 78541</p>	<table border="1"> <tr> <td data-bbox="932 310 987 336"><b>Lot:</b></td> <td data-bbox="1127 310 1154 336">14</td> </tr> <tr> <td data-bbox="932 359 1117 384"><b>Block/Section:</b></td> <td data-bbox="1127 359 1154 384">41</td> </tr> <tr> <td data-bbox="932 443 1089 468"><b>Subdivision:</b></td> <td data-bbox="1127 405 1263 506">Citrus Fruit Development Company Subdivision</td> </tr> <tr> <td data-bbox="932 531 1089 585"><b>Property Description:</b></td> <td data-bbox="1127 522 1224 598">City of Edinburg landfill</td> </tr> </table>	<b>Lot:</b>	14	<b>Block/Section:</b>	41	<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision	<b>Property Description:</b>	City of Edinburg landfill
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<b>Block/Section:</b>	41								
<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision								
<b>Property Description:</b>	City of Edinburg landfill								
<p>Edinburg Regional Disposal Facility 8601 North Jasman Road, Block 50, Lot 4 Edinburg, TX 78541</p>	<table border="1"> <tr> <td data-bbox="932 632 987 657"><b>Lot:</b></td> <td data-bbox="1127 632 1143 657">4</td> </tr> <tr> <td data-bbox="932 680 1117 705"><b>Block/Section:</b></td> <td data-bbox="1127 680 1154 705">50</td> </tr> <tr> <td data-bbox="932 764 1089 789"><b>Subdivision:</b></td> <td data-bbox="1127 726 1263 827">Citrus Fruit Development Company Subdivision</td> </tr> <tr> <td data-bbox="932 852 1089 907"><b>Property Description:</b></td> <td data-bbox="1127 844 1224 919">City of Edinburg landfill</td> </tr> </table>	<b>Lot:</b>	4	<b>Block/Section:</b>	50	<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision	<b>Property Description:</b>	City of Edinburg landfill
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<b>Block/Section:</b>	50								
<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision								
<b>Property Description:</b>	City of Edinburg landfill								
<p>Edinburg Regional Disposal Facility 8601 North Jasman Road, Block 50, Lot 3 Edinburg, TX 78541</p>	<table border="1"> <tr> <td data-bbox="932 953 987 978"><b>Lot:</b></td> <td data-bbox="1127 953 1143 978">3</td> </tr> <tr> <td data-bbox="932 1001 1117 1026"><b>Block/Section:</b></td> <td data-bbox="1127 1001 1154 1026">50</td> </tr> <tr> <td data-bbox="932 1085 1089 1110"><b>Subdivision:</b></td> <td data-bbox="1127 1047 1263 1148">Citrus Fruit Development Company Subdivision</td> </tr> <tr> <td data-bbox="932 1173 1089 1228"><b>Property Description:</b></td> <td data-bbox="1127 1165 1224 1241">City of Edinburg landfill</td> </tr> </table>	<b>Lot:</b>	3	<b>Block/Section:</b>	50	<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision	<b>Property Description:</b>	City of Edinburg landfill
<b>Lot:</b>	3								
<b>Block/Section:</b>	50								
<b>Subdivision:</b>	Citrus Fruit Development Company Subdivision								
<b>Property Description:</b>	City of Edinburg landfill								

**Legal Description of Property**

Requesting that a flood zone determination be completed for: A portion of land within the bounds of the property

Date of Construction:

Lot Type: Multiple lots

Number of structures:

Number of lots: 6

**Applicant Information**

Applicant Title: Miss.

First Name: Alexandra

Last Name: Morales

Address 1: 500 Century Plaza Dr Suite 190

Address 2:

City: Houston  
State, District or Territory: TX  
ZIP Code: 77002  
Email Address: Alexandra\_Morales@golder.com  
Company: Golder Associates Inc.  
Phone: 832-234-4576  
Fax: 281-821-6870

---

**PROPERTY DEEDS**

**DOCUMENT NO. 2597776  
(INCLUDES LOT 7, BLOCK 43**

Hidalgo County  
Arturo Guajardo Jr.  
County Clerk  
Edinburg, TX 78540



70 2015 02597776

Instrument Number: 2015-2597776

Recorded On: March 27, 2015

As  
Recording

Parties:

To

Billable Pages: 5  
Number of Pages: 6

Comment: SWD

**\*\* Examined and Charged as Follows: \*\***

Recording	42.00
Total Recording:	42.00

\*\*\*\*\* THIS PAGE IS PART OF THE INSTRUMENT \*\*\*\*\*

Any provision herein which restricts the Sale, Rental or use of the described REAL PROPERTY because of color or race is invalid and unenforceable under federal law.

**File Information:**

Document Number: 2015-2597776  
Receipt Number: 1509726  
Recorded Date/Time: March 27, 2015 10:18A

**Record and Return To:**

CONTRERAS GUTIERREZ AND ASSOCIATES  
ORIGINAL RETURNED TO CUSTOMER  
TX

User / Station: A Rodriguez - Cash Superstation 09



STATE OF TEXAS  
COUNTY OF HIDALGO

I hereby certify that this instrument was FILED in the File Number sequence on the date/time printed hereon, and was duly RECORDED in the Official Records of Hidalgo County, Texas

Arturo Guajardo Jr.  
County Clerk  
Hidalgo County, TX

**NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OR ALL OF THE FOLLOWING INFORMATION FROM ANY INSTRUMENT THAT TRANSFERS AN INTEREST IN REAL PROPERTY BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.**

**SPECIAL WARRANTY DEED**

DATE: March 26, 2015

GRANTOR: **EDINBURG ECONOMIC DEVELOPMENT CORPORATION, a Texas Non-Profit Development Corporation**

GRANTOR'S MAILING ADDRESS (INCLUDING COUNTY):

**101 N. 10<sup>th</sup> Ave  
Edinburg, Hidalgo County, Texas 78541**

GRANTEE: **CITY OF EDINBURG**

GRANTEE'S MAILING ADDRESS (INCLUDING COUNTY):

**415 W. University Drive  
Edinburg, Hidalgo County, Texas 78539**

CONSIDERATION: TEN AND NO/ 100 DOLLARS (\$10.00) and other valuable consideration to the undersigned paid by the grantee herein named, the receipt of which is hereby acknowledged.

Property (including any improvements):

**REFER TO THE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF FOR ALL PURPOSES.**

RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY:

This conveyance is made and accepted subject to all restrictions, covenants, conditions, rights of way, assessments, outstanding royalty and mineral reservations and easements, if any, affecting the above described property that are valid, existing and properly of record and subject, further, to taxes for the year 2015 and subsequent years.

Grantor, for the Consideration and subject to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty, grants, sells, and conveys to Grantee the Property, together with all and singular the rights and appurtenances thereto in any way belonging, to have and to hold it to Grantee and Grantee's heirs, successors, and assigns forever. Grantor binds Grantor and Grantor's heirs and successors to warrant and forever defend all and singular the Property to Grantee and Grantee's heirs,

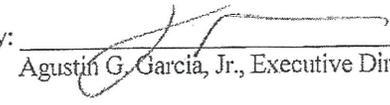
successors, and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof when the claim is by, through, or under Grantor but not otherwise, except as to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty.

THE PROPERTY IS SOLD AS IS, AND WITH ALL FAULTS. GRANTOR MAKES NO REPRESENTATIONS OR WARRANTIES WHATSOEVER, EITHER EXPRESS OR IMPLIED OR STATUTORY, RELATING TO THE PROPERTY OR ANY PORTION THEREOF, OR ITS CONDITION, INCLUDING, WITHOUT LIMITATION, ANY REPRESENTATION OR WARRANTY WITH RESPECT TO (A) THE STRUCTURAL CONDITION OF ANY IMPROVEMENTS, MAINTENANCE AND REPAIR OR THE NEED THEREFOR OR THE EXISTENCE OF AND DEFECTS, WHETHER LATENT, PATENT, STRUCTURAL, FUNCTIONAL, COSMETIC OR OTHERWISE; (B) ENVIRONMENTAL MATTERS RELATING TO THE PROPERTY OR ANY PORTION THEREOF INCLUDING, WITHOUT LIMITATION, THE EXISTENCE OF ANY HAZARDOUS OR TOXIC SUBSTANCE, WASTES, HYDROCARBONS, POLYCHLORINATED BIPHENYLS, ASBESTOS OR RELATED MATERIALS; (C) GEOLOGICAL CONDITIONS, INCLUDING, WITHOUT LIMITATION, SUBSIDENCE, SUBSURFACE CONDITIONS, WATER TABLE, UNDERGROUND WATER RESERVOIRS, LIMITATIONS REGARDING THE WITHDRAWAL OF WATER AND FAULTING; (D) WHETHER OR NOT AND THE EXTENT TO WHICH THE PROPERTY OR ANY PORTION THEREOF ARE AFFECTED BY ANY STREAM (SURFACE OR UNDERGROUND), BODY OF WATER, FLOOD PRONE AREA, FLOOD PLAIN, FLOOD WAY OR SPECIAL FLOOD HAZARD; (E) DRAINAGE; (F) SOIL CONDITIONS; (G) THE AVAILABILITY OF ANY UTILITIES TO THE PROPERTIES OR ANY PORTION THEREOF INCLUDING, WITHOUT LIMITATION, WATER, SEWAGE, GAS AND ELECTRIC; (H) USAGES OF ADJOINING PROPERTY; (I) ACCESS TO THE PROPERTIES OR ANY PORTION THEREOF; AND (J) THE VALUE, COMPLIANCE WITH SPECIFICATIONS, SIZE, LOCATION, AGE, USE, MERCHANTABILITY, DESIGN, QUALITY, DESCRIPTION, DURABILITY, OPERATION OR CONDITION OF THE PROPERTY OR ANY PORTION THEREOF, OR SUITABILITY OF THE PROPERTY OR ANY PORTION THEREOF FOR GRANTEE'S PURPOSES, OR FITNESS FOR ANY USE OF PURPOSE WHATSOEVER. GRANTEE AGREES THAT GRANTEE IS NOT RELYING ON ANY WARRANTY OR REPRESENTATION OF GRANTOR AND THAT GRANTEE HAS SATISFIED OR WILL SATISFY ITSELF AS TO ALL THE FOREGOING MATTERS. GRANTOR FURTHER MAKES NO WARRANTY OF MERCHANTABILITY OF FITNESS FOR PURPOSE IN RESPECT OF THE PROPERTY. GRANTEE AFFIRMS THAT GRANTEE HAS NOT RELIED ON GRANTOR'S SKILL OR JUDGMENT TO SELECT OR FURNISH SUCH PROPERTY FOR ANY PARTICULAR PURPOSE AND THAT GRANTOR MAKES NO WARRANTY THAT SUCH PROPERTY IS FIT FOR ANY PARTICULAR PURPOSE.

When the context requires, singular nouns and pronouns include the plural.

**SIGNATURE PAGE TO FOLLOW**

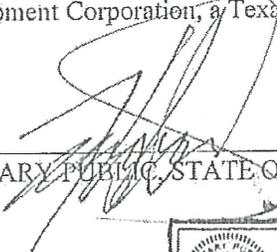
**EDINBURG ECONOMIC DEVELOPMENT CORPORATION**  
A Texas non-profit corporation

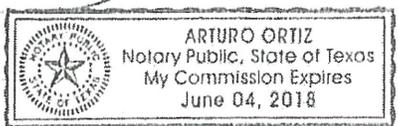
By:   
Agustin G. Garcia, Jr., Executive Director

**CORPORATE ACKNOWLEDGMENT**

STATE OF TEXAS           §  
  §  
COUNTY OF HIDALGO   §

This instrument was acknowledged before me on this 26th day of March, 2015 by Agustin G. Garcia, Jr., Executive Director of Edinburg Economic Development Corporation, a Texas non-profit development corporation, on behalf of said corporation.

  
NOTARY PUBLIC, STATE OF TEXAS



**AFTER RECORDING RETURN TO:**  
CONTRERAS GUTIERREZ AND ASSOCIATES  
10113 N. 10<sup>th</sup> St., Suite L  
McAllen, Texas 78504  
File #03-027/ GF#0003160037

EXHIBIT 'A'

TRACT 1:

Being a 100.03 acre tract of land being out of a part or portion of Lot Forty-one (41), Lot Forty-two (42) and Lot Fifty (50) of SANTA CRUZ RANCH, situated in Hidalgo County, Texas, according to the map or plat thereof recorded in Volume "Z", Page 161, of the Deed Records of Hidalgo County, Texas; and being out of a part or portion of that certain tract of land as conveyed to SKC Development, L.T.D., a Texas limited partnership in Warranty Deed dated May 29, 2003, as recorded in Document Number 1205101 of the Official Records of Hidalgo County, Texas; said 100.03 acre tract of land being more particularly described by metes and bounds as follows, with all bearings referenced to Santa Cruz Gardens Unit No. 3, situated in Hidalgo County, Texas, according to the map or plat thereof recorded in Volume 09, Page 03 of the Map Records of Hidalgo County, Texas;

COMMENCING at a found Cotton Spindle located on the South right-of-way line of Davis Road (60-foot right-of-way), also being the Northeast corner of E.C.I.S.D. Elementary No. 28, situated in Hidalgo County, Texas, according to the map or plat thereof recorded in Instrument Number 2174899 of the Map Records of Hidalgo County, Texas;

THENCE North 81 degrees 37 minutes 00 seconds West, at 968.72 feet pass a point at the Northwest corner of said E.C.I.S.D. Elementary No. 28, in all a total distance of 1078.72 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap located on the South right-of-way line of said Davis Road (60-foot right-of-way), also being the North line of said tract of land conveyed to SKC Development, L.T.D. for the Northeast corner and POINT OF BEGINNING of the tract of land herein described;

THENCE South 08 degrees 23 minutes 00 seconds West, 511.00 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at the beginning of a curve to the right on the East line of the tract of land herein described;

THENCE along the arc of said curve to the right, having a chord of South 13 degrees 52 minutes 04 seconds West, 141.45 feet, a radius of 740.00 feet, a central angle of 10 degrees 58 minutes 07 seconds, a distance of 141.67 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at a point of tangency on the East line of said tract of land herein described;

THENCE South 19 degrees 21 minutes 07 seconds West, 38.00 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at the beginning of a curve to the right on the East line of the tract of land herein described;

THENCE along the arc of said curve to the right, having a chord of South 35 degrees 48 minutes 04 seconds West, 453.10 feet, a radius of 800.07 feet, a central angle of 32 degrees 53 minutes 53 seconds, a distance of 459.39 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at a point of tangency on the East line of said tract of land herein described;

THENCE South 52 degrees 15 minutes 01 seconds West, 1,041.93 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at the beginning of a curve to the left on the East line of the tract of land herein described;

THENCE along the arc of said curve to the left, having a chord of South 36 degrees 00 minutes 00 seconds West, 873.06 feet, a radius of 1,560.00 feet, a central angle of 32 degrees 30 minutes 01 seconds, a distance of 884.89 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at a point of reverse curvature on the East line of said tract of land herein described;

THENCE along the arc of said curve to the right, having a chord of South 23 degrees 26 minutes 21 seconds West, 63.06 feet, a radius of 490.00 feet, a central angle of 07 degrees 22 minutes 43 seconds, a distance of 63.10 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for the Southeast corner of the tract of land herein described;

EXHIBIT 'A'  
(continued)

~~THENCE North 81 degrees 37 minutes 00 seconds West, 814.46 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for the Southwest corner of the tract of land herein described;~~

~~THENCE North 08 degrees 23 minutes 00 seconds East, 2,677.00 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap located on the South right-of-way line of said Davis Road (60-foot right-of-way), for the Northwest corner of the tract of land herein described;~~

~~THENCE South 81 degrees 37 minutes 00 seconds East with the South right-of-way line of said Davis Road, 2,487.00 feet to the POINT OF BEGINNING; containing 100.03 acres of land more or less.~~

Tract 2:

A 50.00 acre tract of land being all of Lots 3, 4, 5, 6, and 7, Block 43, CITRUS FRUIT DEVELOPMENT COMPANY SUBDIVISION, Hidalgo County, Texas, according to the map recorded in Volume 6, Page 428 through 431, Deed Records in the Office of the County Clerk of Hidalgo County, Texas, also being a portion of those certain tracts described in Administrator's Warranty Deed with Vendor's Lien described in Document #1155189, Official Records, Hidalgo County, Texas, reference to which is here made for all purposes, and being more fully described by metes and bounds as follows:

BEGINNING at a found cotton picker spindle on the centerline of a County Road being the Southeast corner of said Lot 7, Block 43, for the Southeast corner of herein described tract;

THENCE North 81 degrees 03 minutes 00 seconds West along said centerline of a County Road also being the South line of said Lot 7, Block 43, pass at 420.70 feet a point being the Southwest corner of said Lot 7, Block 43, also being the Southeast corner of said Lot 6, Block 43, and continuing along the South line of said Lot 6, Block 43, for a total distance of 841.40 feet to a set cotton picker spindle being the Southwest corner of said Lot 6, Block 43, for the Southwest corner of herein described tract;

THENCE North 08 degrees 57 minutes 00 seconds East along the centerline of an unopened County Road also being the West line of said Lot 6, Block 43, pass at 20.00 feet a found one-inch iron pipe being the apparent North Right-of-Way line of said County Road, pass at 1,035.40 feet a point being the Northwest corner of said Lot 6, Block 43, also being the Southwest corner of said Lot 5, Block 43, and continuing along the West line of said Lot 5, Block 43, for a total distance of 2,070.80 feet to a set one-half inch iron rod on the centerline of an unopened County Road being the Northwest corner of said Lot 5, Block 43, for the Northwest corner of herein described tract;

THENCE South 81 degrees 03 minutes 00 seconds East along said centerline of an unopened County Road also being the North line of said Lot 5, Block 43, pass at 420.70 feet a point being the Northeast corner of said Lot 5, Block 43, also being the Northwest corner of said Lot 4, Block 43, pass at 841.40 feet a point being the Northeast corner of said Lot 4, Block 43, also being the Northwest corner of said Lot 3, Block 43, and continuing along the North line of said Lot 3, Block 43, for a total distance of 1,262.10 feet to a found one-half inch iron rod being the Northeast corner of said Lot 3, Block 43, for the Northeast corner of herein described tract;

THENCE South 08 degrees 57 minutes 00 seconds West 1,035.40 feet along the East line of said Lot 3, Block 43, to a found one-half inch iron rod being the Southeast corner of said Lot 3, Block 43, for an exterior corner of herein described tract;

THENCE North 81 degrees 03 minutes 00 seconds West 420.70 feet along the South line of said Lot 3, Block 43, to a found one-half inch iron rod being the Southwest corner of said Lot 3, Block 43, also being the

Northeast corner of said Lot 7, Block 43, for an interior corner of herein described tract;

THENCE South 08 degrees 57 minutes 00 seconds West along the East line of said Lot 7, Block 43, pass at 1,015.40 feet a found one-half inch iron rod being the apparent North Right-of-Way line of said County Road, and continuing for a total distance of 1,035.40 feet to the POINT OF BEGINNING.

**DOCUMENT NO. 2225641  
(INCLUDES LOT 8, BLOCK 43)**

\*\*\*\* Electronically Filed Document \*\*\*\*

Hidalgo County  
Arturo Guajardo Jr.  
County Clerk

Document Number: 2011-2225641  
Recorded As : RECORDING ELECTRONIC

Recorded On: July 25, 2011  
Recorded At: 02:31:52 pm  
Number of Pages: 4

Recording Fee: \$24.00

Parties:  
Direct-  
Indirect-

Receipt Number: 1212276  
Processed By: Imelda Leal

\*\*\*\*\* THIS PAGE IS PART OF THE INSTRUMENT \*\*\*\*\*

Any provision herein which restricts the Sale, Rental or use of the described REAL PROPERTY because of color or race is invalid and unenforceable under federal law.



STATE OF TEXAS  
COUNTY OF HIDALGO

I hereby certify that this instrument was FILED in the File Number sequence on the date/time printed hereon, and was duly RECORDED in the Official Records of Hidalgo County, Texas

Arturo Guajardo Jr.  
County Clerk  
Hidalgo County, TX

CHARGE: VLTC  
GF#125497

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### WARRANTY DEED WITH VENDOR'S LIEN

Date: July 20, 2011

Grantor: MVP PROPERTIES, LLC, a Texas Limited Liability Company

Grantor's Mailing Address (including county): 3101 North Jackson Road  
McAllen, Hidalgo County, Texas 78501

Grantee: CITY OF EDINBURG, a Texas Municipal Corporation

Grantee's Mailing Address (including county): P.O. Box 1079  
Edinburg, Hidalgo County, Texas 78540-1079

Consideration: TEN AND NO/100 (\$10.00) DOLLARS and a note of even date executed by Grantee and payable to the order of Grantor in the principal amount of EIGHT HUNDRED FORTY-THREE THOUSAND SEVEN HUNDRED FIFTY AND NO/100 DOLLARS (\$843,750.00). The note is secured by a first and superior vendor's lien and superior title retained in this deed and by a first-lien deed of trust of even date from Grantee to CIRO OCHOA, JR., trustee.

Property (including any improvements):

A 50.00 acre tract of land being all of Lots 1, 2, 8, 9 and 10, Block 43, CITRUS FRUIT DEVELOPMENT COMPANY SUBDIVISION, Hidalgo County, Texas, according to the map recorded in Volume 6, Pages 428-431, Deed Records in the Office of the County Clerk of Hidalgo County, Texas, also being a portion of those certain tracts described in Administrator's Warranty Deed with Vendor's Lien recorded in Document # 1155189, Official Records, Hidalgo County, Texas, reference to which is here made for all purposes, and being more fully described by metes and bounds as follows:

BEGINNING at a set cotton picker spindle on the centerline of a County Road being the southeast corner of said Lot 10, Block 43, for the Southeast corner of herein described tract;

THENCE, North 81 degrees, 03 minutes, 00 seconds West along said centerline of a County Road also being the South line of said Lot 10, Block 43, pass at 420.70 feet a point being the Southwest corner of said Lot 10, Block 43, also being the Southeast corner of said Lot 9, Block 43, pass at 841.40 feet a point being the Southwest corner of said Lot 9, Block 43, also being the Southeast corner of said Lot 8, Block 43, and continuing along the South line of said Lot 8, Block 43, for a total distance of 1,262.10 feet to a set cotton picker spindle being the Southwest corner of said Lot 8, Block 43, for the Southwest corner of herein described tract

THENCE, North 08 degrees, 57 minutes, 00 seconds East along the West line of Lot 8, Block 43, pass at 20.00 feet a set one-half inch iron rod being the apparent North Right-of-Way line of said County Road, and continuing for a total distance of 1,035.40 feet a set one-half inch iron rod being the Northwest corner of said Lot 8, Block 43, for an exterior corner of herein described tract;

THENCE South 81 degrees, 03 minutes, 00 seconds East 420.70 feet along the north line of Lot 8, Block 43, to a set one-half inch iron rod being the Northeast corner of said Lot 8, Block 43, also being the Southwest corner of said Lot 2, Block 43, for an interior corner of herein described tract;

THENCE North 08 degrees 57 minutes 00 seconds East 1,035.40 feet along the west line of said Lot 2, Block 43, to a set one-half inch iron rod on the centerline of an unopened County Road being the Northwest corner of said Lot 2, Block 43, for the Northwest corner of herein described tract.

THENCE South 81 degrees 03 minutes 00 seconds East along said centerline of an unopened County Road also being the north line of said Lot 2, Block 43, pass at 420.70 feet a point being the Northeast corner of said Lot 2, Block 43, also being the Northwest corner of said Lot 1, Block 43, and continuing along the north line of said Lot 1, Block 43, for a total distance of 841.40 feet to a found one-half inch iron rod being the Northeast corner of said Lot 1, Block 43, for the Northeast corner of herein described tract;

THENCE South 08 degrees, 57 minutes, 00 seconds West along the East line of said Lot 1, Block 43, pass at 1,035.40 feet a point being the Southeast corner of said Lot 1, Block 43, also being the Northeast corner of said Lot 10, Block 43, pass at 2,050.80 feet a set one-half inch iron rod being the apparent North Right-of-Way line of said County Road, and continuing for a total distance of 2,070.80 feet to the POINT OF BEGINNING.

Reservations from Conveyance: NONE

Exceptions to Conveyance and Warranty: To the extent they validly exist:

1. Roadways as shown on the map of Citrus Fruit Development Company Subdivision, recorded in Volume 6, Pages 428-431, Deed Records of Hidalgo County, Texas.

2. Subject to any portion of subject property described herein lying within canal right of way.
3. Terms, stipulations and conditions contained in Oil, Gas and Mineral Lease executed by L.A. Gannaway and wife Julia Schwab Gannaway to Sinclair Oil and Gas Company, dated December 7, 1954, recorded in Volume 164, Page 575, Oil and Gas Records of Hidalgo County, Texas.
4. Terms, stipulations and conditions contained in the Declaration of Unit as set forth in instrument dated February 4, 1955, recorded in Volume 171, Page 358, Oil and Gas Records of Hidalgo County, Texas.
5. Terms, stipulations and conditions contained in Declaration of Unit as set forth in instrument dated August 12, 1959, recorded in Volume 236, Page 375, Oil and Gas Records of Hidalgo County, Texas.
6. Mineral and/or royalty reservation contained in deed dated November 25, 2002, filed January 7, 2003 under Document Number 1155189, and dated June 28, 2010, filed June 29, 2010 under Document Number 2115785, Official Records of Hidalgo County, Texas.
7. Any portion of the property described herein within the limits or boundaries of any public or private roadway and/or highway.
8. Any encroachment, encumbrance, violation, variation, or adverse circumstance affecting the title that would be disclosed by an accurate and complete land survey of the land.
9. Standby fees, taxes and assessments by any taxing authority for the year 2011, and subsequent years, and subsequent taxes and assessments by any taxing authority for prior years due to change in land usage or ownership, the payment of which Grantee assumes.

GRANTEE ACKNOWLEDGES AND AGREES THAT GRANTOR HAS NOT MADE, DOES NOT MAKE AND SPECIFICALLY DISCLAIMS ANY REPRESENTATION, WARRANTIES, PROMISES, COVENANTS, AGREEMENTS OR GUARANTITIES OF ANY KIND OR CHARACTER WHATSOEVER, WHETHER EXPRESS OR IMPLIED, ORAL OR WRITTEN, PAST, PRESENT OR FUTURE, OF, AS TO, CONCERNING OR WITH RESPECT TO (A) THE NATURE, QUALITY OR CONDITION OF THE PROPERTY, INCLUDING, WITHOUT LIMITATION, THE WATER, THE SOIL, AND GEOLOGY, (B) THE INCOME TO BE DERIVED FROM THE PROPERTY, (C) THE SUITABILITY OF THE PROPERTY FOR ANY AND ALL ACTIVITIES AND USES WHICH GRANTEE MAY CONDUCT THEREON, (D) THE COMPLIANCE OF OR BY THE PROPERTY OR ITS OPERATION WITH ANY LAWS, RULES, ORDINANCES OR REGULATIONS OF ANY APPLICABLE GOVERNMENTAL AUTHORITY OR BODY, INCLUDING, WITHOUT LIMITATION, THE AMERICANS WITH DISABILITIES ACT AND ANY RULES AND REGULATIONS PROMULGATED THEREUNDER OR IN CONNECTION THEREWITH, AND THE TEXAS ARCHITECTURAL BARRIERS ACT AND THE RULES AND REGULATIONS PROMULGATED THEREUNDER OR IN CONNECTION THEREWITH, (E) THE HABITABILITY, MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OF THE PROPERTY, OR (F) ANY OTHER MATTER WITH RESPECT TO THE PROPERTY, AND SPECIFICALLY THAT GRANTOR HAS NOT MADE, DOES NOT MAKE ANY SPECIFICALLY DISCLAIMS ANY REPRESENTATIONS REGARDING SOLID WASTE, AS DEFINED BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY REGULATIONS AT 40 C.F.R., PART 261, OR THE DISPOSAL OR EXISTENCE, IN OR ON THE PROPERTY, OF ANY HAZARDOUS SUBSTANCE, AS DEFINED BY THE COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY ACT OF 1980, AS AMENDED, AND APPLICABLE STATE LAWS, AND REGULATIONS PROMULGATED THEREUNDER. GRANTEE FURTHER ACKNOWLEDGES AND AGREES THAT HAVING BEEN GIVEN THE OPPORTUNITY TO INSPECT THE PROPERTY, GRANTEE RELIES SOLELY ON ITS OWN INVESTIGATION OF THE PROPERTY AND NOT ON ANY INFORMATION PROVIDED OR TO BE PROVIDED BY GRANTOR. GRANTEE FURTHER ACKNOWLEDGES AND AGREES THAT ANY INFORMATION PROVIDED OR TO BE PROVIDED WITH RESPECT TO THE PROPERTY WAS OBTAINED FROM A VARIETY OF SOURCES AND THAT GRANTOR HAS NOT MADE ANY INDEPENDENT INVESTIGATION OR VERIFICATION OF SUCH INFORMATION. GRANTEE FURTHER ACKNOWLEDGES AND AGREES THAT THE SALE OF THE PROPERTY AS PROVIDED FOR HEREIN IS MADE ON AN "AS IS, WHERE IS" CONDITION AND BASIS "WITH ALL FAULTS."

GRANTEE RELEASES GRANTOR FROM LIABILITY FOR ENVIRONMENTAL PROBLEMS AFFECTING THE PROPERTY, INCLUDING LIABILITY (1) UNDER THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA), THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), THE TEXAS SOLID WASTE DISPOSAL ACT, AND THE TEXAS WATER CODE; OR (2) ARISING AS THE RESULT OF THEORIES OF PRODUCT LIABILITY AND STRICT LIABILITY, OR UNDER NEW LAWS OR CHANGES TO EXISTING LAWS ENACTED AFTER THE EFFECTIVE DATE OF THE PURCHASE CONTRACT THAT WOULD OTHERWISE

**IMPOSE ON GRANTORS IN THIS TYPE OF TRANSACTION NEW LIABILITIES FOR ENVIRONMENTAL PROBLEMS AFFECTING THE PROPERTY. THIS RELEASE APPLIES EVEN WHEN THE ENVIRONMENTAL PROBLEMS AFFECTING THE PROPERTY RESULT FROM GRANTOR'S OWN NEGLIGENCE OR THE NEGLIGENCE OF GRANTOR'S REPRESENTATIVE.**

Grantor, for the Consideration and subject to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty, grants, sells, and conveys to Grantee the Property, together with all and singular the rights and appurtenances thereto in any way belonging, to have and to hold it to Grantee and Grantee's heirs, successors, and assigns forever. Grantor binds Grantor and Grantor's heirs and successors to warrant and forever defend all and singular the Property to Grantee and Grantee's heirs, successors, and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty.

The vendor's lien against and superior title to the Property are retained until each note described is fully paid according to its terms, at which time this deed will become absolute.

When the context requires, singular nouns and pronouns include the plural.

MVP PROPERTIES, LLC, a Texas Limited Liability Company

BY: *Raul Medina*  
RAUL MEDINA, Member

BY: *Matias Pena, Jr.*  
MATIAS PENA, JR., Member

BY: *Jesus Villalobos*  
JESUS VILLALOBOS, Member

STATE OF TEXAS  
COUNTY OF HIDALGO

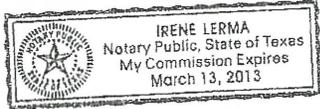
This instrument was acknowledged before me on July 20, 2011 by RAUL MEDINA, Member, of MVP PROPERTIES, LLC, a Texas Limited Liability Company, on behalf of said company.



*Belia N. Saenz*  
NOTARY PUBLIC - STATE OF TEXAS

STATE OF TEXAS  
COUNTY OF HIDALGO

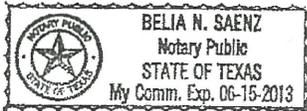
This instrument was acknowledged before me on July 20<sup>th</sup>, 2011 by MATIAS PENA, JR., Member, of MVP PROPERTIES, LLC, a Texas Limited Liability Company, on behalf of said company.



*Irene Lerma*  
NOTARY PUBLIC - STATE OF TEXAS

STATE OF TEXAS  
COUNTY OF HIDALGO

This instrument was acknowledged before me on July 20, 2011 by JESUS VILLALOBOS, Member, of MVP PROPERTIES, LLC, a Texas Limited Liability Company, on behalf of said company.



*Belia N. Saenz*  
NOTARY PUBLIC - STATE OF TEXAS

AFTER RECORDING RETURN TO :  
CITY OF EDINBURG  
P.O. BOX 1079  
Edinburg, Texas 78540-1079

PREPARED IN THE LAW OFFICE OF:  
L.G. 'JERRY' CANALES  
217 W. Cano  
Edinburg, Texas 78539  
File No.: 125497

**DOCUMENT NO. 2597776  
(INCLUDES LOTS 13 & 14, BLOCK 41)**

Hidalgo County  
Arturo Guajardo Jr.  
County Clerk  
Edinburg, TX 78540



70 2015 02597776

Instrument Number: 2015-2597776

Recorded On: March 27, 2015

As  
Recording

Parties:

To

Billable Pages: 5  
Number of Pages: 6

Comment: SWD

**\*\* Examined and Charged as Follows: \*\***

Recording	42.00
Total Recording:	42.00

\*\*\*\*\* THIS PAGE IS PART OF THE INSTRUMENT \*\*\*\*\*

Any provision herein which restricts the Sale, Rental or use of the described REAL PROPERTY because of color or race is invalid and unenforceable under federal law.

**File Information:**

Document Number: 2015-2597776  
Receipt Number: 1509726  
Recorded Date/Time: March 27, 2015 10:18A

**Record and Return To:**

CONTRERAS GUTIERREZ AND ASSOCIATES  
ORIGINAL RETURNED TO CUSTOMER  
TX

User / Station: A Rodriguez - Cash Superstation 09



STATE OF TEXAS  
COUNTY OF HIDALGO

I hereby certify that this instrument was FILED in the File Number sequence on the date/time printed hereon, and was duly REGISTERED in the Official Records of Hidalgo County, Texas

Arturo Guajardo Jr.  
County Clerk  
Hidalgo County, TX

**NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OR ALL OF THE FOLLOWING INFORMATION FROM ANY INSTRUMENT THAT TRANSFERS AN INTEREST IN REAL PROPERTY BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.**

**SPECIAL WARRANTY DEED**

DATE: March 26, 2015

GRANTOR: **EDINBURG ECONOMIC DEVELOPMENT CORPORATION, a Texas Non-Profit Development Corporation**

GRANTOR'S MAILING ADDRESS (INCLUDING COUNTY):

**101 N. 10<sup>th</sup> Ave  
Edinburg, Hidalgo County, Texas 78541**

GRANTEE: **CITY OF EDINBURG**

GRANTEE'S MAILING ADDRESS (INCLUDING COUNTY):

**415 W. University Drive  
Edinburg, Hidalgo County, Texas 78539**

CONSIDERATION: TEN AND NO/ 100 DOLLARS (\$10.00) and other valuable consideration to the undersigned paid by the grantee herein named, the receipt of which is hereby acknowledged.

Property (including any improvements):

**REFER TO THE EXHIBIT "A" ATTACHED HERETO AND MADE A PART HEREOF FOR ALL PURPOSES.**

RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY:

This conveyance is made and accepted subject to all restrictions, covenants, conditions, rights of way, assessments, outstanding royalty and mineral reservations and easements, if any, affecting the above described property that are valid, existing and properly of record and subject, further, to taxes for the year 2015 and subsequent years.

Grantor, for the Consideration and subject to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty, grants, sells, and conveys to Grantee the Property, together with all and singular the rights and appurtenances thereto in any way belonging, to have and to hold it to Grantee and Grantee's heirs, successors, and assigns forever. Grantor binds Grantor and Grantor's heirs and successors to warrant and forever defend all and singular the Property to Grantee and Grantee's heirs,

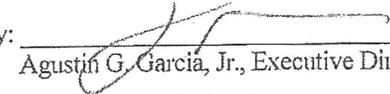
successors, and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof when the claim is by, through, or under Grantor but not otherwise, except as to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty.

THE PROPERTY IS SOLD AS IS, AND WITH ALL FAULTS. GRANTOR MAKES NO REPRESENTATIONS OR WARRANTIES WHATSOEVER, EITHER EXPRESS OR IMPLIED OR STATUTORY, RELATING TO THE PROPERTY OR ANY PORTION THEREOF, OR ITS CONDITION, INCLUDING, WITHOUT LIMITATION, ANY REPRESENTATION OR WARRANTY WITH RESPECT TO (A) THE STRUCTURAL CONDITION OF ANY IMPROVEMENTS, MAINTENANCE AND REPAIR OR THE NEED THEREFOR OR THE EXISTENCE OF AND DEFECTS, WHETHER LATENT, PATENT, STRUCTURAL, FUNCTIONAL, COSMETIC OR OTHERWISE; (B) ENVIRONMENTAL MATTERS RELATING TO THE PROPERTY OR ANY PORTION THEREOF INCLUDING, WITHOUT LIMITATION, THE EXISTENCE OF ANY HAZARDOUS OR TOXIC SUBSTANCE, WASTES, HYDROCARBONS, POLYCHLORINATED BIPHENYLS, ASBESTOS OR RELATED MATERIALS; (C) GEOLOGICAL CONDITIONS, INCLUDING, WITHOUT LIMITATION, SUBSIDENCE, SUBSURFACE CONDITIONS, WATER TABLE, UNDERGROUND WATER RESERVOIRS, LIMITATIONS REGARDING THE WITHDRAWAL OF WATER AND FAULTING; (D) WHETHER OR NOT AND THE EXTENT TO WHICH THE PROPERTY OR ANY PORTION THEREOF ARE AFFECTED BY ANY STREAM (SURFACE OR UNDERGROUND), BODY OF WATER, FLOOD PRONE AREA, FLOOD PLAIN, FLOOD WAY OR SPECIAL FLOOD HAZARD; (E) DRAINAGE; (F) SOIL CONDITIONS; (G) THE AVAILABILITY OF ANY UTILITIES TO THE PROPERTIES OR ANY PORTION THEREOF INCLUDING, WITHOUT LIMITATION, WATER, SEWAGE, GAS AND ELECTRIC; (H) USAGES OF ADJOINING PROPERTY; (I) ACCESS TO THE PROPERTIES OR ANY PORTION THEREOF; AND (J) THE VALUE, COMPLIANCE WITH SPECIFICATIONS, SIZE, LOCATION, AGE, USE, MERCHANTABILITY, DESIGN, QUALITY, DESCRIPTION, DURABILITY, OPERATION OR CONDITION OF THE PROPERTY OR ANY PORTION THEREOF, OR SUITABILITY OF THE PROPERTY OR ANY PORTION THEREOF FOR GRANTEE'S PURPOSES, OR FITNESS FOR ANY USE OF PURPOSE WHATSOEVER. GRANTEE AGREES THAT GRANTEE IS NOT RELYING ON ANY WARRANTY OR REPRESENTATION OF GRANTOR AND THAT GRANTEE HAS SATISFIED OR WILL SATISFY ITSELF AS TO ALL THE FOREGOING MATTERS. GRANTOR FURTHER MAKES NO WARRANTY OF MERCHANTABILITY OF FITNESS FOR PURPOSE IN RESPECT OF THE PROPERTY. GRANTEE AFFIRMS THAT GRANTEE HAS NOT RELIED ON GRANTOR'S SKILL OR JUDGMENT TO SELECT OR FURNISH SUCH PROPERTY FOR ANY PARTICULAR PURPOSE AND THAT GRANTOR MAKES NO WARRANTY THAT SUCH PROPERTY IS FIT FOR ANY PARTICULAR PURPOSE.

When the context requires, singular nouns and pronouns include the plural.

**SIGNATURE PAGE TO FOLLOW**

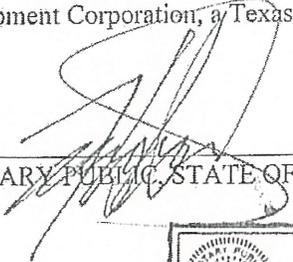
**EDINBURG ECONOMIC DEVELOPMENT CORPORATION**  
A Texas non-profit corporation

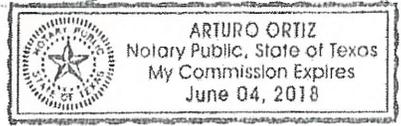
By:   
Agustin G. Garcia, Jr., Executive Director

**CORPORATE ACKNOWLEDGMENT**

STATE OF TEXAS           §  
  §  
COUNTY OF HIDALGO   §

This instrument was acknowledged before me on this 26th day of March, 2015 by Agustin G. Garcia, Jr., Executive Director of Edinburg Economic Development Corporation, a Texas non-profit development corporation, on behalf of said corporation.

  
NOTARY PUBLIC, STATE OF TEXAS



**AFTER RECORDING RETURN TO:**  
CONTRERAS GUTIERREZ AND ASSOCIATES  
10113 N. 10<sup>th</sup> St., Suite L  
McAllen, Texas 78504  
File #03-027/ GF#0003160037

EXHIBIT 'A'

TRACT 1:

Being a 100.03 acre tract of land being out of a part or portion of Lot Forty-one (41), Lot Forty-two (42) and Lot Fifty (50) of SANTA CRUZ RANCH, situated in Hidalgo County, Texas, according to the map or plat thereof recorded in Volume "Z", Page 161, of the Deed Records of Hidalgo County, Texas; and being out of a part or portion of that certain tract of land as conveyed to SKC Development, L.T.D., a Texas limited partnership in Warranty Deed dated May 29, 2003, as recorded in Document Number 1205101 of the Official Records of Hidalgo County, Texas; said 100.03 acre tract of land being more particularly described by metes and bounds as follows, with all bearings referenced to Santa Cruz Gardens Unit No. 3, situated in Hidalgo County, Texas, according to the map or plat thereof recorded in Volume 09, Page 03 of the Map Records of Hidalgo County, Texas;

COMMENCING at a found Cotton Spindle located on the South right-of-way line of Davis Road (60-foot right-of-way), also being the Northeast corner of E.C.I.S.D. Elementary No. 28, situated in Hidalgo County, Texas, according to the map or plat thereof recorded in Instrument Number 2174809 of the Map Records of Hidalgo County, Texas;

THENCE North 81 degrees 37 minutes 00 seconds West, at 968.72 feet pass a point at the Northwest corner of said E.C.I.S.D. Elementary No. 28, in all a total distance of 1078.72 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap located on the South right-of-way line of said Davis Road (60-foot right-of-way), also being the North line of said tract of land conveyed to SKC Development, L.T.D. for the Northeast corner and POINT OF BEGINNING of the tract of land herein described;

THENCE South 08 degrees 23 minutes 00 seconds West, 511.00 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at the beginning of a curve to the right on the East line of the tract of land herein described;

THENCE along the arc of said curve to the right, having a chord of South 13 degrees 52 minutes 04 seconds West, 141.45 feet, a radius of 740.00 feet, a central angle of 10 degrees 58 minutes 07 seconds, a distance of 141.67 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at a point of tangency on the East line of said tract of land herein described;

THENCE South 19 degrees 21 minutes 07 seconds West, 38.00 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at the beginning of a curve to the right on the East line of the tract of land herein described;

THENCE along the arc of said curve to the right, having a chord of South 35 degrees 48 minutes 04 seconds West, 453.10 feet, a radius of 800.07 feet, a central angle of 32 degrees 53 minutes 53 seconds, a distance of 459.39 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at a point of tangency on the East line of said tract of land herein described;

THENCE South 52 degrees 15 minutes 01 seconds West, 1,041.93 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at the beginning of a curve to the left on the East line of the tract of land herein described;

THENCE along the arc of said curve to the left, having a chord of South 36 degrees 00 minutes 00 seconds West, 873.08 feet, a radius of 1,560.00 feet, a central angle of 32 degrees 30 minutes 01 seconds, a distance of 884.89 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for a corner at a point of reverse curvature on the East line of said tract of land herein described;

THENCE along the arc of said curve to the right, having a chord of South 23 degrees 26 minutes 21 seconds West, 63.06 feet, a radius of 490.00 feet, a central angle of 07 degrees 22 minutes 43 seconds, a distance of 63.10 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for the Southeast corner of the tract of land herein described;

EXHIBIT 'A'  
(continued)

~~THENCE North 81 degrees 37 minutes 00 seconds West, 814.46 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap for the Southwest corner of the tract of land herein described;~~

~~THENCE North 08 degrees 23 minutes 00 seconds East, 2,677.00 feet to a set 3/4-inch iron rod with a D.E.C. plastic cap located on the South right-of-way line of said Davis Road (60-foot right-of-way), for the Northwest corner of the tract of land herein described;~~

~~THENCE South 81 degrees 37 minutes 00 seconds East with the South right-of-way line of said Davis Road, 2,487.00 feet to the POINT OF BEGINNING; containing 100.03 acres of land more or less.~~

Tract 2:

A 50.00 acre tract of land being all of Lots 3, 4, 5, 6, and 7, Block 43, CITRUS FRUIT DEVELOPMENT COMPANY SUBDIVISION, Hidalgo County, Texas, according to the map recorded in Volume 6, Page 428 through 431, Deed Records in the Office of the County Clerk of Hidalgo County, Texas, also being a portion of those certain tracts described in Administrator's Warranty Deed with Vendor's Lien described in Document #1155189, Official Records, Hidalgo County, Texas, reference to which is here made for all purposes, and being more fully described by metes and bounds as follows:

BEGINNING at a found colton picker spindle on the centerline of a County Road being the Southeast corner of said Lot 7, Block 43, for the Southeast corner of herein described tract;

THENCE North 81 degrees 03 minutes 00 seconds West along said centerline of a County Road also being the South line of said Lot 7, Block 43, pass at 420.70 feet a point being the Southwest corner of said Lot 7, Block 43, also being the Southeast corner of said Lot 6, Block 43, and continuing along the South line of said Lot 6, Block 43, for a total distance of 841.40 feet to a set colton picker spindle being the Southwest corner of said Lot 6, Block 43, for the Southwest corner of herein described tract;

THENCE North 08 degrees 57 minutes 00 seconds East along the centerline of an unopened County Road also being the West line of said Lot 6, Block 43, pass at 20.00 feet a found one-inch iron pipe being the apparent North Right-of-Way line of said County Road, pass at 1,035.40 feet a point being the Northwest corner of said Lot 6, Block 43, also being the Southwest corner of said Lot 5, Block 43, and continuing along the West line of said Lot 5, Block 43, for a total distance of 2,070.80 feet to a set one-half inch iron rod on the centerline of an unopened County Road being the Northwest corner of said Lot 5, Block 43, for the Northwest corner of herein described tract;

THENCE South 81 degrees 03 minutes 00 seconds East along said centerline of an unopened County Road also being the North line of said Lot 5, Block 43, pass at 420.70 feet a point being the Northeast corner of said Lot 5, Block 43, also being the Northwest corner of said Lot 4, Block 43, pass at 841.40 feet a point being the Northeast corner of said Lot 4, Block 43, also being the Northwest corner of said Lot 3, Block 43, and continuing along the North line of said Lot 3, Block 43, for a total distance of 1,262.10 feet to a found one-half inch iron rod being the Northeast corner of said Lot 3, Block 43, for the Northeast corner of herein described tract;

THENCE South 08 degrees 57 minutes 00 seconds West 1,035.40 feet along the East line of said Lot 3, Block 43, to a found one-half inch iron rod being the Southeast corner of said Lot 3, Block 43, for an exterior corner of herein described tract;

THENCE North 81 degrees 03 minutes 00 seconds West 420.70 feet along the South line of said Lot 3, Block 43, to a found one-half inch iron rod being the Southwest corner of said Lot 3, Block 43, also being the

Northeast corner of said Lot 7, Block 43, for an interior corner of herein described tract;

THENCE South 08 degrees 57 minutes 00 seconds West along the East line of said Lot 7, Block 43, pass at 1,015.40 feet a found one-half inch iron rod being the apparent North Right-of-Way line of said County Road, and continuing for a total distance of 1,035.40 feet to the POINT OF BEGINNING.

**DOCUMENT NO. 25647  
(INCLUDES LOTS 3 & 4, BLOCK 50)**

The State of Texas,  
County of HIDALGO

25647  
Know All Men by These Presents: <sup>250</sup> *AKS*

That I, LAURA LOU BAKER, a feme sole,

of the County of Hidalgo State of Texas for and in consideration

of the sum of ----- Ten and No/100 -----

----- (\$10.00) -----DOLLARS

and other good and valuable consideration  
to me in hand paid by City of Edinburg, Texas, the receipt of which is  
hereby acknowledged and confessed;

XXXXXXXXXXXX

have Granted, Sold and Conveyed, and by these presents do Grant, Sell and Convey unto the said

CITY OF EDINBURG, TEXAS

XXXXXXXXXXXX State of Texas all that certain  
tract or parcel of land being situated in the County of Hidalgo, State  
of Texas and being more fully described as follows, to-wit:  
All of Lots One (1) to Ten (10), both inclusive, in Block Fifty (50),  
Citrus Fruit Development Company Subdivision of lands in the San Salvador  
del Tule Grant, Hidalgo County, Texas, as per map or plat thereof of  
record in the Office of the County Clerk of Hidalgo County, Texas.  
SAVE AND EXCEPT all oil, gas and other minerals, samehaving been excepted  
and reserved in deed to Laura Lou Baker.

SUBJECT TO THE FOLLOWING:

- (1) Oil, Gas & Mineral Lease from A. Y. Baker, Jr. to Lee Hawkins,  
dated Feb. 24, 1945, recorded in Vol. 58, page 503, Oil & Gas Lease Re-  
cords, Hidalgo County, Texas, unitized on February 4, 1955.
- (2) Easements appearing on the recorded map and dedication of the  
subdivision, and all visible easements.

TO HAVE AND TO HOLD the above described premises, together with all and singular the  
rights and appurtenances thereto in anywise belonging unto the said

CITY OF EDINBURG, TEXAS, its successors and assigns  
~~forever and I~~ do hereby bind myself, my  
heirs, executors and administrators, to Warrant and Forever Defend, all and singular the said premises  
unto the said

CITY OF EDINBURG, TEXAS, its successors and assigns  
~~against every person whomsoever lawfully claiming, or to claim the same, or any~~  
part thereof.

WITNESS my hand at Edinburg, Hidalgo County, Texas  
this 9th day of September, 1976.

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

*Laura Lou Baker*  
LAURA LOU BAKER

SINGLE ACKNOWLEDGMENT

THE STATE OF TEXAS,  
COUNTY OF HIDALGO

BEFORE ME, the undersigned, a Notary Public in and for said County and State, on this day personally appeared

Laura Lou Baker

known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that she executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE,  
this the 17th day of September A. D. 19 76



Cecil A. Edwards  
Notary Public in  
and for Hidalgo  
County, Texas

Cecil A. Edwards  
Notary Public in and for Hidalgo County, Texas

SINGLE ACKNOWLEDGMENT

THE STATE OF TEXAS,  
COUNTY OF

BEFORE ME, the undersigned, a Notary Public in and for said County and State, on this day personally appeared

known to me to be the person whose name subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE,  
this the day of A. D. 19

(L. S.)

Notary Public in and for County, Texas

SINGLE ACKNOWLEDGMENT

THE STATE OF TEXAS,  
COUNTY OF

BEFORE ME, the undersigned, a Notary Public in and for said County and State, on this day personally appeared

known to me to be the person whose name subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

GIVEN UNDER MY HAND AND SEAL OF OFFICE,  
this the day of A. D. 19

(L. S.)

Notary Public in and for County, Texas

THE STATE OF TEXAS,  
COUNTY OF

I HEREBY CERTIFY that the foregoing instrument of writing with its certificate of authentication, was filed for record in my office on the day of A. D. 19 at o'clock M., and was duly recorded by me on the day of A. D. 19 in Vol. page of the Records of said County.

WITNESS MY HAND and the Seal of the County Court of said County, at my office in the day and year last above written.

(L. S.)

County Clerk County, Texas  
By Deputy.

25647

Warranty Deed

FROM

TO

FILED FOR RECORD

This day of A.D. 19 at o'clock M.

County Clerk Deputy

RECORDED FILED FOR RECORD THIS DATE

At o'clock M. A. D. 19 In SEP 20 1976 on Page.

SANTOS SALDANA County Clerk - Hidalgo County, Texas Deputy

Recording Fee \$ This instrument should be filed immediately with the County Clerk for Record.

Return to: City of Dallas, P.O. Box 574, Edinburg, TX 78541

**PROPOSED PERMIT BOUNDARY METES AND BOUNDS**

**EXHIBIT "A"**

**PERMIT BOUNDARY  
CITY OF EDINBURG LANDFILL  
LEGAL DESCRIPTION  
602.52 ACRE TRACT**

**BEING** a 602.52 acre tract of land comprised of Lots 42-46 & 57-61, Block 42, South Texas Development Company Subdivision, as shown on a map recorded in Volume 9, Page 44, Map Records Hidalgo County, Texas, and Lots 1-24, The Re-Subdivision of the Citrus Fruit Development Company's Land, as shown on a map recorded in Volume 9, Page 38, Map Records Hidalgo County, Texas, Lots 1-10, Block 51, Lots 1-10, Block 50, and a portion of Lots 6-10, Block 43, all being of the Citrus Fruit Development Company's Land, as shown on a map recorded in Volume 6, Page 430 – 431, Map Records Hidalgo County, Texas, as well as portions of Share 5 & 6, of the Mutual Partition of Tract 158, San Salvador Del Tule Grant, as shown on a map recorded in Volume 16, Page 11, Map Records Hidalgo County, Texas and being more particularly described as follows:

**BEGINNING** at a 5/8" iron rod found at the intersection of two county roads platted yet unopened, for the southwest corner of Lot 6, said Block 50, for the southwest corner and the **POINT OF BEGINNING** of the herein described tract;

**THENCE** North 08°47'19" East, with the west line of said Block 50, at a distance of 2060.15 feet pass a cotton spindle found at the intersection of the centerline of Encintos Road and the centerline of the platted yet unopened road for the southwest corner of Lot 6, said Block 43, continue for a total distance of 2470.00 feet to a calculated point on the west line of Lot 6, said Block 43, for a northwest corner of the herein described tract;

**THENCE** South 81°13'21" East, crossing Lots 6-10, said Block 43, a distance of 2103.60 feet to a calculated point on the common boundary of said Block 42 & 43, and for an interior corner of the herein described tract;

**THENCE** North 08°46'39" East, with the west line of said Block 42, a distance of 635.96 feet to a 5/8" iron rod found for corner of the herein described tract;

**THENCE** North 08°46'38" East, with the west line of said Block 42, a distance of 1025.08 feet to an iron pipe found in the centerline of a platted yet unopened road, for the northwest corner Lot 42 of said Block 42, and for the northwest corner of the herein described tract;

**THENCE** South 81°25'29" East, with the north line of said Block 42, a distance of 2102.31 feet to a 5/8" iron rod found for the northeast corner of Lot 57, said Block 42, and for a corner of the herein described tract;

**THENCE** South 81°16'58" East, with the north line of The Re-Subdivision of the Citrus Fruit Development Company's Land, a distance of 2056.54 feet to a calculated point in the west line of Share 3, of said Mutual Partition, for the northeast corner of Lot 13, of said Re-Subdivision of the Citrus Fruit Development Company's Land, and for the northeast corner of the herein described tract;

**THENCE** South 02°00'45" East, with the east line of said Re-Subdivision of the Citrus Fruit Development Company's Land, a distance of 764.09 feet to a calculated corner for an outside corner of the herein described tract;

**THENCE** South 02°11'40" East, with the east line of said Re-Subdivision of the Citrus Fruit Development Company's Land, a distance of 1167.07 feet to a 5/8" iron rod found for the northwest corner of said Share 5, of said Mutual Partition, and for an interior corner of the herein described tract;

**THENCE** South 80°38'14" East, with the north line of said Share 5, a distance of 1313.67 feet to a calculated point for a northeast corner of the herein described tract;

**THENCE** South 08°47'42" West, crossing said Share 5, a distance of 1609.05 feet to a calculated point for a southeast corner of the herein described tract;

**THENCE** South 62°52'20" West, crossing said Share 5 and Share 6 of said Mutual Partition, a distance of 1064.05 feet to a calculated point for the southeast corner of the herein described tract;

**THENCE** North 81°12'18" West, with the centerline of a platted yet unopened road, same being the south line of Re-Subdivision of the Citrus Fruit Development Company's Land, the south line of said Block 51 and the south line of said Block 50, a distance of 7079.33 feet to the **POINT OF BEGINNING** and containing 602.52 acre of land.

NOTE:

ALL BEARINGS ARE GRID BEARINGS BASED ON THE TEXAS COORDINATE SYSTEM FOR THE LAMBERT SOUTH ZONE NAD 1983.

Stacey King Mora

**Stacey King Mora, RPLS**  
**Registered Professional Land Surveyor**  
**Texas Registration No. 6166**  
**Naismith Engineering, Inc.**



**TBPE F#355    TBPLS F# 100395-00**

**Date:** March 4, 2016



**ELEVATION FORM**

**PAPERWORK BURDEN DISCLOSURE NOTICE**

Public reporting burden for this data collection is estimated to average 1.25 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and submitting the form. This collection is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed on this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing this burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 1800 South Bell Street, Arlington, VA 20598-3005, Paperwork Reduction Project (1660-0015). **NOTE: Do not send your completed form to this address.**

This form must be completed for requests and must be completed and signed by a registered professional engineer or licensed land surveyor. **A DHS - FEMA National Flood Insurance Program (NFIP) Elevation Certificate may be submitted in lieu of this form for single structure requests.**

For requests to remove a structure on natural grade OR on engineered fill from the Special Flood Hazard Area (SFHA), submit the lowest adjacent grade (the lowest ground touching the structure), **including an attached deck or garage**. For requests to remove an entire parcel of land from the SFHA, provide the lowest lot elevation; or, if the request involves an area described by metes and bounds, provide the lowest elevation within the metes and bounds description. All measurements are to be rounded to nearest tenth of a foot. In order to process your request, all information on this form must be completed **in its entirety**. **Incomplete submissions will result in processing delays.**

- NFIP Community Number: 480338 Property Name or Address: Edinburg Regional Disposal Facility, 8601 North Jasman road, Edinburg, TX 78539
- Are the elevations listed below based on  **existing** or  **proposed** conditions? (Check one)
- For the existing or proposed structures listed below, what are the types of construction? (check all that apply)  
 crawl space  slab on grade  basement/enclosure  other (explain) **Edinburg Regional Disposal facility (landfill)**
- Has DHS - FEMA identified this area as subject to land subsidence or uplift? (see instructions)  Yes  No  
 If yes, what is the date of the current re-leveling? / (month/year)
- What is the elevation datum?  NGVD 29  NAVD 88  Other (explain) **Naismith Engineering surveyed site using Type 1 benchmark located off Encinitos Road.**  
 If any of the elevations listed below were computed using a datum different than the datum used for the effective Flood Insurance Rate Map (FIRM) (e.g., NGVD 29 or NAVD 88), what was the conversion factor? **Site Elevation +1.15 ft. = FIRM Datum**  
**Local Elevation +/- ft. = FIRM Datum**
- Please provide the Latitude and Longitude of the most upstream edge of the **structure** (in decimal degrees to the nearest fifth decimal place):  
 Indicate Datum:  WGS84  NAD83  NAD27 Lat. Long.  
 Please provide the Latitude and Longitude of the most upstream edge of the **property** (in decimal degrees to the nearest fifth decimal place):  
 Indicate Datum:  WGS84  NAD83  NAD27 Lat. Long.  
 NAD83 Texas State Planes, South Zone for latitudes and longitudes.  
 Did not provide "most upstream edge" location because this requirement does not apply in the case of small unnamed ponding areas.

Address	Lot Number	Block Number	Lowest Lot Elevation*	Lowest Adjacent Grade To Structure	Base Flood Elevation	BFE Source
8601 Jasman Road	13	43	81 ft-msl	81 ft-msl	86 ft-msl	Zone A - Estimated
8601 Jasman Road	14	43	86 ft-msl	86 ft-msl	86 ft-msl	Zone A - Estimated

This certification is to be signed and sealed by a licensed land surveyor, registered professional engineer, or architect authorized by law to certify elevation information. All documents submitted in support of this request are correct to the best of my knowledge. I understand that any false statement may be punishable by fine or imprisonment under Title 18 of the United States Code, Section 1001.

Certifier's Name:	License No.:	Expiration Date:
Company Name:	Telephone No.:	<div style="border: 2px solid black; width: 100%; height: 100%; display: flex; align-items: center; justify-content: center;">                 Seal (optional)             </div>
Email:	Fax No.:	
Signature:	Date:	

\* For requests involving a portion of property, include the lowest ground elevation within the metes and bounds description.  
 Please note: If the Lowest Adjacent Grade to Structure is the only elevation provided, a determination will be issued for the structure only.



**COMMUNITY ACKNOWLEDGEMENT FORM**

DEPARTMENT OF HOMELAND SECURITY - FEDERAL EMERGENCY MANAGEMENT AGENCY  
**COMMUNITY ACKNOWLEDGMENT FORM**

O.M.B. NO. 1660-0015  
 Expires February 28, 2014

**PAPERWORK BURDEN DISCLOSURE NOTICE**

Public reporting burden for this data collection is estimated to average 1.38 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and submitting the form. This collection is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed on this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing this burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 1800 South Bell Street, Arlington, VA 20598-3005, Paperwork Reduction Project (1660-0015). NOTE: Do not send your completed form to this address.

This form must be completed for requests involving the existing or proposed placement of fill (complete Section A) *OR* to provide acknowledgment of this request to remove a property from the SFHA which was previously located within the regulatory floodway (complete Section B).

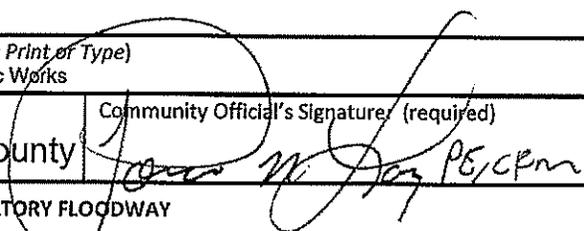
This form must be completed and signed by the official responsible for floodplain management in the community. The six digit NFIP community number and the subject property address must appear in the spaces provided below. Incomplete submissions will result in processing delays. Please refer to the MT-1 Instructions for additional information about this form.

Community Number: 480338 Property Name or Address: Edinburg Regional Disposal Facility, Hidalgo County, TX

**A. REQUESTS INVOLVING THE PLACEMENT OF FILL**

As the community official responsible for floodplain management, I hereby acknowledge that we have received and reviewed this Letter of Map Revision Based on Fill (LOMR-F) or Conditional LOMR-F request. Based upon the community's review, we find the completed or proposed project meets or is designed to meet all of the community floodplain management requirements, including the requirement that no fill be placed in the regulatory floodway, and that all necessary Federal, State, and local permits have been, or in the case of a Conditional LOMR-F, will be obtained. For Conditional LOMR-F requests, the applicant has or will document Endangered Species Act (ESA) compliance to FEMA prior to issuance of the Conditional LOMR-F determination. For LOMR-F requests, I acknowledge that compliance with Sections 9 and 10 of the ESA has been achieved independently of FEMA's process. Section 9 of the ESA prohibits anyone from "taking" or harming an endangered species. If an action might harm an endangered species, a permit is required from U.S. Fish and Wildlife Service or National Marine Fisheries Service under Section 10 of the ESA. For actions authorized, funded, or being carried out by Federal or State agencies, documentation from the agency showing its compliance with Section 7(a)(2) of the ESA will be submitted. In addition, we have determined that the land and any existing or proposed structures to be removed from the SFHA are or will be reasonably safe from flooding as defined in 44CFR 65.2(c), and that we have available upon request by DHS-FEMA, all analyses and documentation used to make this determination. For LOMR-F requests, we understand that this request is being forwarded to DHS-FEMA for a possible map revision.

Community Comments:

Community Official's Name and Title: <i>(Please Print or Type)</i> Ponciano Longoria, PE, CFM, Director of Public Works		Telephone No.: 956-388-8210
Community Name: City of Edinburg, Hidalgo County	Community Official's Signature (required) 	Date: 4/21/16

**B. PROPERTY LOCATED WITHIN THE REGULATORY FLOODWAY**

As the community official responsible for floodplain management, I hereby acknowledge that we have received and reviewed this request for a LOMA. We understand that this request is being forwarded to DHS-FEMA to determine if this property has been inadvertently included in the regulatory floodway. We acknowledge that no fill on this property has been or will be placed within the designated regulatory floodway. We find that the completed or proposed project meets or is designed to meet all of the community floodplain management requirements.

Community Comments:

Community Official's Name and Title: <i>(Please Print or Type)</i>		Telephone No.:
Community Name:	Community Official's Signature (required):	Date:

**USFWS LETTER  
"NOT LIKELY TO ADVERSELY AFFECT" DETERMINATION**



**United States Department of the Interior**  
**FISH AND WILDLIFE SERVICE**  
Corpus Christi Office  
Texas Coastal Ecological Service Field Office  
3325 Green Jay Rd  
Alamo, TX 78516

October 20, 2015

Chad E. Ireland, PE  
Senior Project Geological Engineer  
Golder Associates  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073

Consultation No. 02ETCC00-2016-I-0030

Dear Mr. Ireland:

Thank you for your letter received October 13, 2015, regarding the effects of the proposed expansion of the Edinburg Sanitary Landfill on species federally listed species in Hidalgo County, Texas. In addition, your project was evaluated with respect to wetlands and other important fish and wildlife resources.

It is the Service's understanding that the City of Edinburg proposes to expand the existing Sanitary Landfill from 254 acres to approximately 603 acres. The expansion would incorporate 258.8 acres of agricultural and bare land and about 20 acres of dense Tamaulipan thornscrub habitat. On August 14, 2015, we met with Mr. Ramiro L. Gomez to discuss the project, and it was agreed to preserve a 200' wide corridor of dense native woodland along the northern property boundary, and establish a 200' wide corridor planted with native vegetation, connecting to the southern property boundary of dense native woodland owned by the City. This is shown on the enclosed Figure 1.

To comply with the Migratory Bird Treaty Act and avoid impacts to avian species, the City proposes to complete all clearing activities during the non-nesting season (September-February) to avoid potential impacts with birds nesting within the ROW. If project activities must be conducted during nesting season, we recommend surveying for nests prior to commencing work and if a nest is found, and if possible, the Service recommends a buffer of vegetation ( $\geq 50$  ft) remain around the nest until the young have fledged or the nest is abandoned.

You made a "not likely to adversely affect" determination on Gulf Coast jaguarundi, and the ocelot. Based on project information submitted and above understanding, the Service concurs with your determination. We appreciate the opportunity to provide pre-planning information. If we can be of further assistance, please contact Ernesto Reyes at (956) 784-7560.

Enclosure

Sincerely,

Dawn Gardiner  
Acting Field Supervisor

cc: Russell Hooten, Wildlife Habitat Assessment Program, Corpus Christi, TX



October 12, 2015

Project No. 1401491

Ernesto Reyes, Director  
U.S. Fish & Wildlife Service  
Wildlife Diversity Program  
3325 Green Jay Road  
Alamo, TX 78516

**RE: RESPONSE TO MEETING  
THREATENED OR ENDANGERED SPECIES REVIEW  
PERMIT AMENDMENT APPLICATION  
EDINBURG REGIONAL DISPOSAL FACILITY, TCEQ PERMIT MSW-956C  
HIDALGO COUNTY, TEXAS**

Dear Mr. Reyes:

This letter is in response to a meeting between Ramiro L Gomez, Jr., Director of Solid Waste Management for the City of Edinburg and you on August 25, 2015 regarding suitable habitat for federally listed ocelot (*Leopardus pardalis*).

Texas Parks and Wildlife Department (TPWD) responded to a request for a rare species review for a permit amendment application to expand the 254-acre Type I facility to approximately 603 acres in a letter dated September 14, 2015. TPWD provided the following recommendation for the ocelot:

*"In order to preserve potential ocelot habitat and avoid and/or minimize potential negative impacts to ocelots, TPWD recommends avoiding or minimizing clearing potential ocelot habitat. At a minimum, TPWD recommends preserving a corridor of the dense native woodland, at least 300-feet wide, along the easternmost boundary of the property. Also, all lighting installed around the perimeter and within the expanded disposal facility should be down-shielded and directed into the property."*

As a result of the meeting's discussion, it was agreed to preserve a 200-ft wide corridor along the northern property boundary of dense native woodland and establish a 200-ft wide corridor connecting to southern property boundary as shown on Figure 1. Fencing will be added to the north side along the property line.

On behalf of City of Edinburg, we are requesting your concurrence in the proposed 200-ft wide wildlife corridor. If further information or documentation is required by your department, please give me a call at (281) 821-6868.

Sincerely,

**GOLDER ASSOCIATES INC.**

Chad E. Ireland, PE  
Senior Project Geological Engineer

Charles G. Dominguez, PE  
VP Central Region / Principal

cc: Ramiro L Gomez, Jr., City of Edinburg, Director of Solid Waste Management  
Russell Hooten, Texas Parks and Wildlife Department, Wildlife Assessment Program, Wildlife Division

CEI/CGD/kjc

Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

Tel: (281) 821-6868 Fax: (281) 821-6870 www.golder.com



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06/23/2016

1401491

Federal Emergency Management Agency  
LOMC Clearinghouse  
847 South Pickett Street  
Alexandria, VA 22304-4605

**RE: RESPONSE TO REQUEST FOR CLOMR-F  
PERMIT AMENDMENT APPLICATION  
EDINBURG REGIONAL DISPOSAL FACILITY  
HIDALGO COUNTY, TEXAS  
TCEQ PERMIT MSW-956C  
CASE NUMBER 16-06-2076C**

Dear Recipient:

**Comment:** After an initial review of your submittal, we need to clarify exactly what you are requesting from FEMA.

**Response:** A CLOMR-F is requested.

**If your request is to receive a comment from FEMA regarding whether this property can be conditionally removed from the SFHA then the following data is required.**

**Comment:** Please have the Chief Executive Officer (CEO) of the community or an official designated by the CEO fill out section A of the Community Acknowledgement Form.

**Response:** A signed community acknowledgement form (Form 3) was submitted on April 25, 2016. Please find the attached copy of the submitted form.

**Comment:** Please have the elevation form certified by a registered land surveyor or professional engineer.

**Response:** Revised Elevation form certified by a professional engineer is attached.

**Comment:** Projects that are not constructed, funded or permitted by a federal agency must have the project proponent submit a statement as to the impacts of the project on endangered and threatened species to comply with the Endangered Species Act (ESA). Please note that the information provided by the Services may be used to inform this determination but cannot replace this requirement. Please submit a signed statement from the project proponent or community official responsible for floodplain development confirming that the impact of the project on endangered and threatened species consistent with the following terminology. For projects that are not constructed, funded or permitted by a federal agency, the requester must demonstrate ESA compliance by submitting to FEMA written justification that a "Take," meaning to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct, will not occur to threatened and endangered species present in the county as a result of the project. If a project has the potential to "Take" listed species, an Incidental Take

p:\\_2014 project folders\1401491 city of edinburg\application\part iii\ib\_locationrestrictionsdocumentation\iib5\_femaclomr-f\response to comments\iib5\_itr\_response to requestforclomrf\_text.docx

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500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA  
Tel: (281) 821-6868 Fax: (281) 821-6870 www.golder.com



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**Perm it may be submitted with justification that the project is the subject, or is covered by the subject, of the permit.**

Response: A "take" will not occur to threatened and endangered species present in the county as a result of the project. Please find the attached endangered species biological assessment prepared by Naismith Engineering, Inc.

**Comment: The submitted Elevation Form indicates that the elevations provided are based on existing conditions. Please note that CLORM-F requests must be submitted based on proposed conditions. Please clarify whether the elevations are based on existing conditions or proposed.**

Response: The elevation form has been revised to represent proposed conditions.

**Comment: Your Metes and Bounds Description and accompanying Map for your portion of the property to be removed from the SFHA cannot have any areas of water such as the proposed stormwater ponds in it. Please revise your Metes and Bounds Description and Map to show this. The map and description need to be certified by a registered land surveyor or professional engineer.**

Response: Please find the attached revised Figure IIB5-3 to demonstrate the proposed fill within SFHA without storm water ponds.

## CLOSING

We appreciate your assistance with this request for a CLOMR-F. If further information is required by your department, please call the undersigned at (281) 821-6868.

Sincerely,

**GOLDER ASSOCIATES INC.**



Chad E. Ireland, P.E.  
Senior Project Geological Engineer



May Xin, P.E.  
Senior Engineer

cc: Ramiro L. Gomez, Jr. City of Edinburg Department of Solid Waste

Attachments:

FEDERAL EMERGENCY MANAGEMENT AGENCY  
PAYMENT INFORMATION FORM

Community Name: City of Edinburg, Hidalgo County

Project Identifier: Edinburg Regional Disposal Facility, City of Edinburg, Hidalgo County, Community number 480338

**THIS FORM MUST BE MAILED, ALONG WITH THE APPROPRIATE FEE, TO THE ADDRESS BELOW OR FAXED TO THE FAX NUMBER BELOW.**

Please make check or money order payable to the National Flood Insurance Program.

Type of Request:

- MT-1 application }  
 MT-2 application }

**LOMC Clearinghouse**  
847 South Pickett Street  
Alexandria, VA 22304-4605  
Attn.: LOMC Manager

- EDR application }

**FEMA Project Library**  
847 South Pickett Street  
Alexandria, VA 22304-4605  
FAX (703) 212-4090

Request No. (if known): \_\_\_\_\_

Check No.: \_\_\_\_\_

Amount: <sup>\$</sup> 900.00

INITIAL FEE\*  FINAL FEE  FEE BALANCE\*\*  MASTER CARD  VISA  CHECK  MONEY ORDER

\*Note: Check only for EDR and/or Alluvial Fan requests (as appropriate).

\*\*Note: Check only if submitting a corrected fee for an ongoing request.

COMPLETE THIS SECTION ONLY IF PAYING BY CREDIT CARD

CARD NUMBER

EXP. DATE

5 5 6 7 — 3 5 6 0 — 5 7 3 9 — 8 6 7 9  
1 2 3 4      5 6 7 8      9 10 11 12      13 14 15 16

0 3 — 1 8  
Month      Year

6/23/16  
Date

*Kelly Crowe*  
Signature

NAME (AS IT APPEARS ON CARD): Kelly Crowe Golder Associates  
(please print or type)

ADDRESS: 500 Century Plaza Drive, Suite 190  
*(for your credit card receipt-please print or type)*  
Houston, Texas 77073

DAYTIME PHONE: 281-821-6868

DEPARTMENT OF HOMELAND SECURITY - FEDERAL EMERGENCY MANAGEMENT AGENCY  
**COMMUNITY ACKNOWLEDGMENT FORM**

O.M.B. NO. 1660-0015  
 Expires February 28, 2014

**PAPERWORK BURDEN DISCLOSURE NOTICE**

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This form must be completed for requests involving the existing or proposed placement of fill (complete Section A) *OR* to provide acknowledgment of this request to remove a property from the SFHA which was previously located within the regulatory floodway (complete Section B).

This form must be completed and signed by the official responsible for floodplain management in the community. The six digit NFIP community number and the subject property address must appear in the spaces provided below. Incomplete submissions will result in processing delays. Please refer to the MT-1 instructions for additional information about this form.

Community Number: 480338 Property Name or Address: Edinburg Regional Disposal Facility, Hidalgo County, TX

**A. REQUESTS INVOLVING THE PLACEMENT OF FILL**

As the community official responsible for floodplain management, I hereby acknowledge that we have received and reviewed this Letter of Map Revision Based on Fill (LOMR-F) or Conditional LOMR-F request. Based upon the community's review, we find the completed or proposed project meets or is designed to meet all of the community floodplain management requirements, including the requirement that no fill be placed in the regulatory floodway, and that all necessary Federal, State, and local permits have been, or in the case of a Conditional LOMR-F, will be obtained. For Conditional LOMR-F requests, the applicant has or will document Endangered Species Act (ESA) compliance to FEMA prior to issuance of the Conditional LOMR-F determination. For LOMR-F requests, I acknowledge that compliance with Sections 9 and 10 of the ESA has been achieved independently of FEMA's process. Section 9 of the ESA prohibits anyone from "taking" or harming an endangered species. If an action might harm an endangered species, a permit is required from U.S. Fish and Wildlife Service or National Marine Fisheries Service under Section 10 of the ESA. For actions authorized, funded, or being carried out by Federal or State agencies, documentation from the agency showing its compliance with Section 7(a)(2) of the ESA will be submitted. In addition, we have determined that the land and any existing or proposed structures to be removed from the SFHA are or will be reasonably safe from flooding as defined in 44CFR 65.2(c), and that we have available upon request by DHS-FEMA, all analyses and documentation used to make this determination. For LOMR-F requests, we understand that this request is being forwarded to DHS-FEMA for a possible map revision.

Community Comments:

Community Official's Name and Title: <i>(Please Print or Type)</i> Ponciano Longoria, PE, CFM, Director of Public Works		Telephone No.: 956-388-8210
Community Name: City of Edinburg, Hidalgo County	Community Official's Signature (required) <i>[Signature]</i> PE/CFM	Date: 4/21/16

**B. PROPERTY LOCATED WITHIN THE REGULATORY FLOODWAY**

As the community official responsible for floodplain management, I hereby acknowledge that we have received and reviewed this request for a LOMA. We understand that this request is being forwarded to DHS-FEMA to determine if this property has been inadvertently included in the regulatory floodway. We acknowledge that no fill on this property has been or will be placed within the designated regulatory floodway. We find that the completed or proposed project meets or is designed to meet all of the community floodplain management requirements.

Community Comments:

Community Official's Name and Title: <i>(Please Print or Type)</i>		Telephone No.:
Community Name:	Community Official's Signature (required):	Date:

DEPARTMENT OF HOMELAND SECURITY - FEDERAL EMERGENCY MANAGEMENT AGENCY  
**ELEVATION FORM**

O.M.B. NO. 1660-0015  
 Expires February 28, 2014

**PAPERWORK BURDEN DISCLOSURE NOTICE**

Public reporting burden for this data collection is estimated to average 1.25 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and submitting the form. This collection is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed on this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing this burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 1800 South Bell Street, Arlington, VA 20598-3005, Paperwork Reduction Project (1660-0015). **NOTE: Do not send your completed form to this address.**

This form must be completed for requests and must be completed and signed by a registered professional engineer or licensed land surveyor. **A DHS - FEMA National Flood Insurance Program (NFIP) Elevation Certificate may be submitted in lieu of this form for single structure requests.**

For requests to remove a structure on natural grade OR on engineered fill from the Special Flood Hazard Area (SFHA), submit the lowest adjacent grade (the lowest ground touching the structure), **including an attached deck or garage**. For requests to remove an entire parcel of land from the SFHA, provide the lowest lot elevation; or, if the request involves an area described by metes and bounds, provide the lowest elevation within the metes and bounds description. All measurements are to be rounded to nearest tenth of a foot. In order to process your request, all information on this form must be completed **in its entirety**. **Incomplete submissions will result in processing delays.**

- NFIP Community Number: 480338 Property Name or Address: Edinburg Regional Disposal Facility, 8601 North Jasman road, Edinburg, TX 78539
- Are the elevations listed below based on  existing or  proposed conditions? (Check one)
- For the existing or proposed structures listed below, what are the types of construction? (check all that apply)  
 crawl space  slab on grade  basement/enclosure  other (explain) Edinburg Regional Disposal facility (landfill)
- Has DHS - FEMA identified this area as subject to land subsidence or uplift? (see instructions)  Yes  No  
 If yes, what is the date of the current re-leveling? / (month/year)
- What is the elevation datum?  NGVD 29  NAVD 88  Other (explain) Naismith Engineering surveyed site using Type 1 benchmark located off Encinitos Road.  
 If any of the elevations listed below were computed using a datum different than the datum used for the effective Flood Insurance Rate Map (FIRM) (e.g., NGVD 29 or NAVD 88), what was the conversion factor? Site Elevation +1.15 ft. = FIRM Datum  
 Local Elevation +/- ft. = FIRM Datum
- Please provide the Latitude and Longitude of the most upstream edge of the **structure** (in decimal degrees to the nearest fifth decimal place):  
 Indicate Datum:  WGS84  NAD83  NAD27 Lat. Long.  
 Please provide the Latitude and Longitude of the most upstream edge of the **property** (in decimal degrees to the nearest fifth decimal place):  
 Indicate Datum:  WGS84  NAD83  NAD27 Lat. Long.  
 NAD83 Texas State Planes, South Zone for latitudes and longitudes.  
 Did not provide "most upstream edge" location because this requirement does not apply in the case of small unnamed ponding areas.

Address	Lot Number	Block Number	Lowest Lot Elevation*	Lowest Adjacent Grade To Structure	Base Flood Elevation	BFE Source
8601 Jasman Road	13	41	82 ft-msl	94 ft-msl	86 ft-msl	Zone A - Estimated
8601 Jasman Road	14	41	85 ft-msl	95 ft-msl	86 ft-msl	Zone A - Estimated

This certification is to be signed and sealed by a licensed land surveyor, registered professional engineer, or architect authorized by law to certify elevation information. All documents submitted in support of this request are correct to the best of my knowledge. I understand that any false statement may be punishable by fine or imprisonment under Title 18 of the United States Code, Section 1001.

Certifier's Name: Chad E. Ireland	License No.: 99293	Expiration Date: 03/31/2017
Company Name: Golder Associates Inc.	Telephone No.: 281-214-0004	
Email: cireland@golder.com	Fax No. 281-821-6870	
Signature: <i>Chad E. Ireland</i>	Date: 6/23/16	

\* For requests involving a portion of property, include the lowest ground elevation within the metes and bounds description.  
 Please note: If the Lowest Adjacent Grade to Structure is the only elevation provided, a determination will be issued for the structure only.



**APPENDIX IIC2-2**  
**FEMA RESPONSE TO CLOMR-F REQUEST**



# Federal Emergency Management Agency

Washington, D.C. 20472

October 07, 2016

Miss Alexandra Morales  
Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77002

IN REPLY REFER TO CASE NO.: 16-06-2076C  
Community: Hidalgo County, Texas  
(Unincorporated Areas)  
Community No.: 480334  
Map Panel No.: 4803340325D  
Effective Date: June 6, 2000 revised by LOMR  
01-06-1095P, dated May 17, 2001  
218-I

RE: Edinburg Regional Disposal Facility

Dear Miss Morales:

This is in reference to a request that the Federal Emergency Management Agency (FEMA) issue a Conditional Letter of Map Revision Based on Fill (CLOMR-F) for the property referenced above in accordance with the National Flood Insurance Program (NFIP) regulations.

After reviewing the information submitted with the request and the effective NFIP map for the referenced community, FEMA has determined that the property is partially located within a Special Flood Hazard Area (SFHA) designated Zone AE with established base (100-year) flood elevations and designated Zone A without established base (100-year) flood elevations.

The subject property is shown on NFIP map Panel Number 4803340325D, dated June 6, 2000 for Hidalgo County, Texas. The portion of this map panel showing the site was subsequently revised by Letter of Map Revision case number 01-06-1095P, dated May 17, 2001. The submitted technical data indicates fill is proposed along the Zone AE floodplain for Santa Cruz Canal as well as portions of several Zone A ponding areas shown within the site. The data further indicates that the site is to be used for expansion of an existing landfill.

Because the proposed development does not encroach on a FEMA designated floodway and no buildings are anticipated to be constructed on the site, there are no procedures under the NFIP regulations that require action on your request by FEMA. Hidalgo County, or other agencies having jurisdiction of the site, may have requirements that apply.

With your request you submitted a payment in the amount of \$900 as the review and processing fee. We will process a refund for this amount and you will be notified when the processing is complete.

If you have any questions concerning this letter, please contact the FEMA Map Information eXchange toll free at (877) 336-2627 (877-FEMA MAP) or by letter addressed to the Federal Emergency Management Agency, LOMC Clearinghouse, 847 South Pickett Street, Alexandria, VA 22304-4605.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luis Rodriguez', with a large, stylized flourish at the end.

Luis Rodriguez, P.E., Chief  
Engineering Management Branch  
Federal Insurance and Mitigation Administration

cc: Mr. Raul Segin, Hidalgo County District General Manager and Floodplain Administrator  
Mr. Chad E. Ireland, Senior Project Geological Engineer, Golder Associates Inc.

**APPENDIX IIC2-3**  
**COMMUNITY FLOODPLAIN MANAGEMENT REVIEW AND APPROVAL**

DEPARTMENT OF HOMELAND SECURITY - FEDERAL EMERGENCY MANAGEMENT AGENCY  
**COMMUNITY ACKNOWLEDGMENT FORM**

O.M.B. NO. 1660-0015  
 Expires February 28, 2014

**PAPERWORK BURDEN DISCLOSURE NOTICE**

Public reporting burden for this data collection is estimated to average 1.38 hours per response. The burden estimate includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and submitting the form. This collection is required to obtain or retain benefits. You are not required to respond to this collection of information unless a valid OMB control number is displayed on this form. Send comments regarding the accuracy of the burden estimate and any suggestions for reducing this burden to: Information Collections Management, Department of Homeland Security, Federal Emergency Management Agency, 1800 South Bell Street, Arlington, VA 20598-3005, Paperwork Reduction Project (1660-0015). NOTE: Do not send your completed form to this address.

This form must be completed for requests involving the existing or proposed placement of fill (complete Section A) *OR* to provide acknowledgment of this request to remove a property from the SFHA which was previously located within the regulatory floodway (complete Section B).

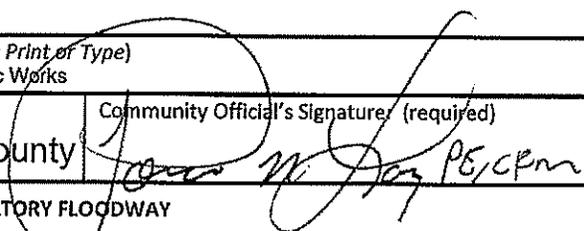
This form must be completed and signed by the official responsible for floodplain management in the community. The six digit NFIP community number and the subject property address must appear in the spaces provided below. Incomplete submissions will result in processing delays. Please refer to the MT-1 Instructions for additional information about this form.

Community Number: 480338 Property Name or Address: Edinburg Regional Disposal Facility, Hidalgo County, TX

**A. REQUESTS INVOLVING THE PLACEMENT OF FILL**

As the community official responsible for floodplain management, I hereby acknowledge that we have received and reviewed this Letter of Map Revision Based on Fill (LOMR-F) or Conditional LOMR-F request. Based upon the community's review, we find the completed or proposed project meets or is designed to meet all of the community floodplain management requirements, including the requirement that no fill be placed in the regulatory floodway, and that all necessary Federal, State, and local permits have been, or in the case of a Conditional LOMR-F, will be obtained. For Conditional LOMR-F requests, the applicant has or will document Endangered Species Act (ESA) compliance to FEMA prior to issuance of the Conditional LOMR-F determination. For LOMR-F requests, I acknowledge that compliance with Sections 9 and 10 of the ESA has been achieved independently of FEMA's process. Section 9 of the ESA prohibits anyone from "taking" or harming an endangered species. If an action might harm an endangered species, a permit is required from U.S. Fish and Wildlife Service or National Marine Fisheries Service under Section 10 of the ESA. For actions authorized, funded, or being carried out by Federal or State agencies, documentation from the agency showing its compliance with Section 7(a)(2) of the ESA will be submitted. In addition, we have determined that the land and any existing or proposed structures to be removed from the SFHA are or will be reasonably safe from flooding as defined in 44CFR 65.2(c), and that we have available upon request by DHS-FEMA, all analyses and documentation used to make this determination. For LOMR-F requests, we understand that this request is being forwarded to DHS-FEMA for a possible map revision.

Community Comments:

Community Official's Name and Title: <i>(Please Print or Type)</i> Ponciano Longoria, PE, CFM, Director of Public Works		Telephone No.: 956-388-8210
Community Name: City of Edinburg, Hidalgo County	Community Official's Signature (required) 	Date: 4/21/16

**B. PROPERTY LOCATED WITHIN THE REGULATORY FLOODWAY**

As the community official responsible for floodplain management, I hereby acknowledge that we have received and reviewed this request for a LOMA. We understand that this request is being forwarded to DHS-FEMA to determine if this property has been inadvertently included in the regulatory floodway. We acknowledge that no fill on this property has been or will be placed within the designated regulatory floodway. We find that the completed or proposed project meets or is designed to meet all of the community floodplain management requirements.

Community Comments:

Community Official's Name and Title: <i>(Please Print or Type)</i>		Telephone No.:
Community Name:	Community Official's Signature (required):	Date:

**APPENDIX IIE2-3**  
**TPWD RESPONSE TO RECOMMENDATIONS**

## Crowe, Kelly

---

**To:** Russell Hooten  
**Subject:** RE: Threatened or Endangered Species Review

---

**From:** Russell Hooten [<mailto:Russell.Hooten@tpwd.texas.gov>]  
**Sent:** Wednesday, October 25, 2017 2:14 PM  
**To:** Crowe, Kelly <[Kelly\\_Crowe@golder.com](mailto:Kelly_Crowe@golder.com)>  
**Subject:** RE: Threatened or Endangered Species Review

Hi Kelly,

Yes, I did review it. Overall, TPWD is OK with the responses to our recommendations.

The letter to me indicates that there was an attachment, a letter from Ernesto Reyes dated October 20, 2015. I did not receive that attachment. Could you forward that to me so our records for this project can be complete?

Thank you,  
Russell



PERMIT AMENDMENT APPLICATION

Part III

# SITE DEVELOPMENT PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

INTENDED FOR PERMITTING  
PURPOSES ONLY

July 2017  
Revised: November 2017

Project No. 1401491



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## List of Attachments

- Attachment 1 General Facility Design
- Attachment 2 Surface Water Drainage Report
- Attachment 3 Waste Management Unit Design
- Attachment 4 Geology Report
- Attachment 5 Groundwater Characterization and Monitoring Report
- Attachment 6 Landfill Gas Management Plan
- Attachment 7 Closure Plan
- Attachment 8 Post Closure Plan
- Attachment 9 Closure and Post Closure Cost Estimates



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

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## **EXECUTIVE SUMMARY**

This Site Development Plan (SDP) has been developed in accordance with 30 TAC §330.63(a). This plan includes criteria used to design the Edinburg Regional Disposal Facility to safeguard the health, welfare, and physical property of the people and the environment through the consideration of geology, soil conditions, drainage, land use, zoning, adequacy of access roads and highways, and other considerations, as general facility design.

### **1.0 SITE DEVELOPMENT PLAN**

#### **1.1 General Facility Design**

Part III1, General Facility Design has been developed in accordance with 30 TAC §330.63(b). This attachment includes descriptions of facility access, waste movement, sanitation, water pollution control, and endangered species protection.

#### **1.2 Surface Water Drainage Report**

Part III2, Surface Water Drainage Report has been developed in accordance with 30 TAC §330.63(c). This attachment provides a detailed description of the hydrologic and hydraulic analyses performed for the facility design and includes detailed design calculations and operational considerations for the management of site stormwater. As demonstrated, the facility design complies with the requirements of 30 TAC §330.63(c) and 30 TAC 330 Subchapter G, and will not adversely alter existing or permitted drainage patterns. The facility will be constructed, maintained, and operated to manage run-on and runoff during the peak discharge of a 25-year rainfall event and will prevent the off-site discharge of waste and feedstock material, including, but not limited to, in-process and/or processed materials. Surface water drainage within the facility will be controlled to minimize surface water running onto, into, and off the treatment area.

#### **1.3 Waste Management Unit Design**

Part III3, Waste Management Unit Design Report has been developed in accordance with 30 TAC §330.63(d). This attachment includes a Liner Quality Control Plan is prepared under the direction of a licensed professional engineer in accordance with 30 TAC §330.63(d)(4), and applicable sections of 30 TAC, Chapter 330, Subchapter H “Liner System Design and Operation.” The Edinburg Regional Disposal Facility (the facility) has been designed to safeguard the health, welfare, and physical property of the people and the environment through various design considerations, which include volume and site life calculations, geotechnical analyses, liner design, leachate management, all-weather access, and other operational considerations.

#### **1.4 Geology Report**

Part III4, Geology Report has been developed in accordance with 30 TAC §330.63(e). This attachment is prepared and signed by a qualified groundwater scientist. Previously prepared documents supplement this

report as necessary to provide the requested information. Sources and references for information are provided. This report summarizes available data related to regional geology and local geology and aquifers in the vicinity of the facility. Based on a review of information gathered and on the results of subsurface, geotechnical, and hydrogeological investigations, the Edinburg Regional Disposal Facility is suitable for its continued operation and development as a municipal solid waste disposal facility

## **1.5 Groundwater Characterization and Monitoring Report**

Part III5, Groundwater Characterization and Monitoring Report has been developed in accordance with 30 TAC §330.63(f). This attachment is prepared in accordance with 30 TAC §§330.63(f) and 330.403. This report summarizes available data related to the occurrence and distribution of groundwater, establishes a groundwater monitoring system, and provides a Groundwater Sampling and Analysis Plan (GWSAP).

## **1.6 Landfill Gas Management Plan**

Part III6, Landfill Gas Management Plan is prepared in accordance with 30 TAC §330.63(g) and all of the requirements 30 TAC §330, Subchapter I. A Landfill Gas Management Plan (LFGMP) has been developed for the facility to provide a site-specific approach for implementing landfill gas (LFG) monitoring and control.

In addition to this LFGMP developed to address all of the requirement in 30 TAC §330 Subchapter I, the City must also comply with other applicable federal and state air quality regulations.

- 40 CFR Part 60, Subpart WWW
- 40 CFR Part 60, Subpart XXX
- 40 CFR Part 63, Subpart A, 63.6(e)(3)
- 30 TAC §330 Subchapter U

## **1.7 Closure Plan**

Part III7, Closure Plan has been developed to addresses the requirements of Title 30 of the Texas Administrative Code (TAC) §§330.63(h) and 330.457 (Subchapter K), Closure Requirements for Municipal Solid Waste Landfill Units that Receive Waste on or after October 9, 1993. This plan includes a description of the final cover systems, a description of the steps that will be undertaken to close each filled disposal area, and the methods used to install the final cover.

## **1.8 Post-Closure Plan**

Part III8, Post-Closure Plan is prepared in accordance with 30 TAC Chapter 330 Subchapter K and the City shall place a copy of this plan in the operating record upon issuance of this permit. The post-closure plan includes a description of the monitoring and maintenance activities required and the frequency at which these activities will be performed. The City is the responsible for overseeing and conducting post-closure care activities.

City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, TX. 78541  
(956) 381-5635

Also included in this post-closure plan is a description of the planned uses of any portion of the closed unit during the post-closure period in accordance with 30 TAC §330.465. A detailed written estimate, in current dollars, of the cost of post-closure care maintenance and any corrective action as described in this post-closure care plan or required by the TCEQ is included in Part III9B, Post-Closure Cost Estimate.

## **1.9 Closure and Post-Closure Cost Estimates**

Part III9, Closure and Post-Closure Cost Estimates has been prepared in accordance with 30 TAC §330 Subchapter L and documentation required to demonstrate financial assurance as specified in 30 TAC §37 Subchapter R.

Established in 1960, Golder Associates is a global, employee-owned organization that helps clients find sustainable solutions to the challenges of finite resources, energy and water supply and management, waste management, urbanization, and climate change. We provide a wide range of independent consulting, design, and construction services in our specialist areas of earth, environment, and energy. By building strong relationships and meeting the needs of clients, our people have created one of the most trusted professional services organizations in the world.

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South America	+ 56 2 2616 2000

[solutions@golder.com](mailto:solutions@golder.com)  
[www.golder.com](http://www.golder.com)

**Golder Associates Inc.**  
**500 Century Plaza Drive, Suite 190**  
**Houston, TX 77073 USA**  
**Tel: (281) 821-6868**  
**Fax: (281) 821-6870**



**Engineering Earth's Development, Preserving Earth's Integrity**

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PERMIT AMENDMENT APPLICATION  
Part III, Attachment 1

# GENERAL FACILITY DESIGN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78541 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

INTENDED FOR PERMITTING  
PURPOSES ONLY

Project No. 1401491

July 2017  
Revised: November 2017



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 Figure III1-2 Schematic View of Various Waste Disposal, Processing, and Storage Areas



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

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## 1.0 GENERAL FACILITY DESIGN

### 1.1 Facility Access

30 TAC §§330.63(b)(1) & 330.223(c)

The facility shares and entrance with Type IV Landfill TCEQ Permit MSW-2302 where access to the facility is controlled by a perimeter fence, a composite of either a four-foot barbed wire fence or a six-foot steel-link mesh fence, 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. A gate located at the facility entrance is locked by site personnel at the end of the day's operations. Another gate is located on the west side of the facility on Encinitos Road and is locked unless access is needed by site personnel.

### 1.2 Waste Movement

30 TAC §330.63(b)(2)

Figure III1-1, Waste Movement Flow Diagram and Figure III1-2, Schematic View of Various Waste Disposal, Processing, and Storage Areas illustrate a generalized process design and working plan of the overall facility.

#### 1.2.1 Flow Diagram

30 TAC §330.63(b)(2)(A)

Figure III1-1, Waste Movement Flow Diagram is a flow diagram illustrating storage, processing, and disposal sequences for the types of waste accepted in accordance to Part II, §1.0 Waste Acceptance Plan.

#### 1.2.2 Schematic View Drawings

30 TAC §330.63(b)(2)(B)

Figure III1-2, Schematic View of Various Waste Disposal, Processing, and Storage Areas is a schematic view showing the various phases of collection, separation, processing, and disposal for the types of waste accepted in accordance to the Part II, §1.0 Waste Acceptance Plan. Structures/areas for the gatehouse and scales, citizen collection station, reusable material staging area, and large item salvage and white good storage area is located with the permit boundary of Type IV Landfill TCEQ Permit MSW-2302.

### **1.2.3 Ventilation and Odor Control**

30 TAC §330.63(b)(2)(C)

The facility will follow measures outlined in Part IV, Site Operating Plan §4.14, Odor Management Plan for all storage, separation, processing, and disposal units.

### **1.2.4 Generalized Construction and Design Details**

#### **1.2.4.1 Storage and Processing**

30 TAC §330.63(b)(2)(D)

Roll-off waste containers are used for temporary storage for citizen collection, reusable materials, and large item salvage. Roll-off waste containers are prefabricated to industry standards, therefore generalized construction details are not required.

#### **1.2.4.2 Storage and Processing Component Slab and Subsurface Supports**

30 TAC §330.63(b)(2)(E)

The foundation of designated areas for citizen collection, reusable materials, and large item salvage as depicted in Figure III1-2, Schematic View of Various Waste Disposal, Processing, and Storage Areas are maintained; no slab and subsurface supports for roll-off waste containers are required.

#### **1.2.4.3 Storage and Processing Component Containment Dikes or Walls**

30 TAC §330.63(b)(2)(F)

All storm water is contained within the facility boundary as well as within the Type IV Landfill TCEQ Permit MSW-2302 boundary with no discharge into surface water in the state as a result of any storm event; therefore containment dikes or walls are not required to enclose all storage and processing components and all loading and unloading areas.

### **1.3 Endangered Species**

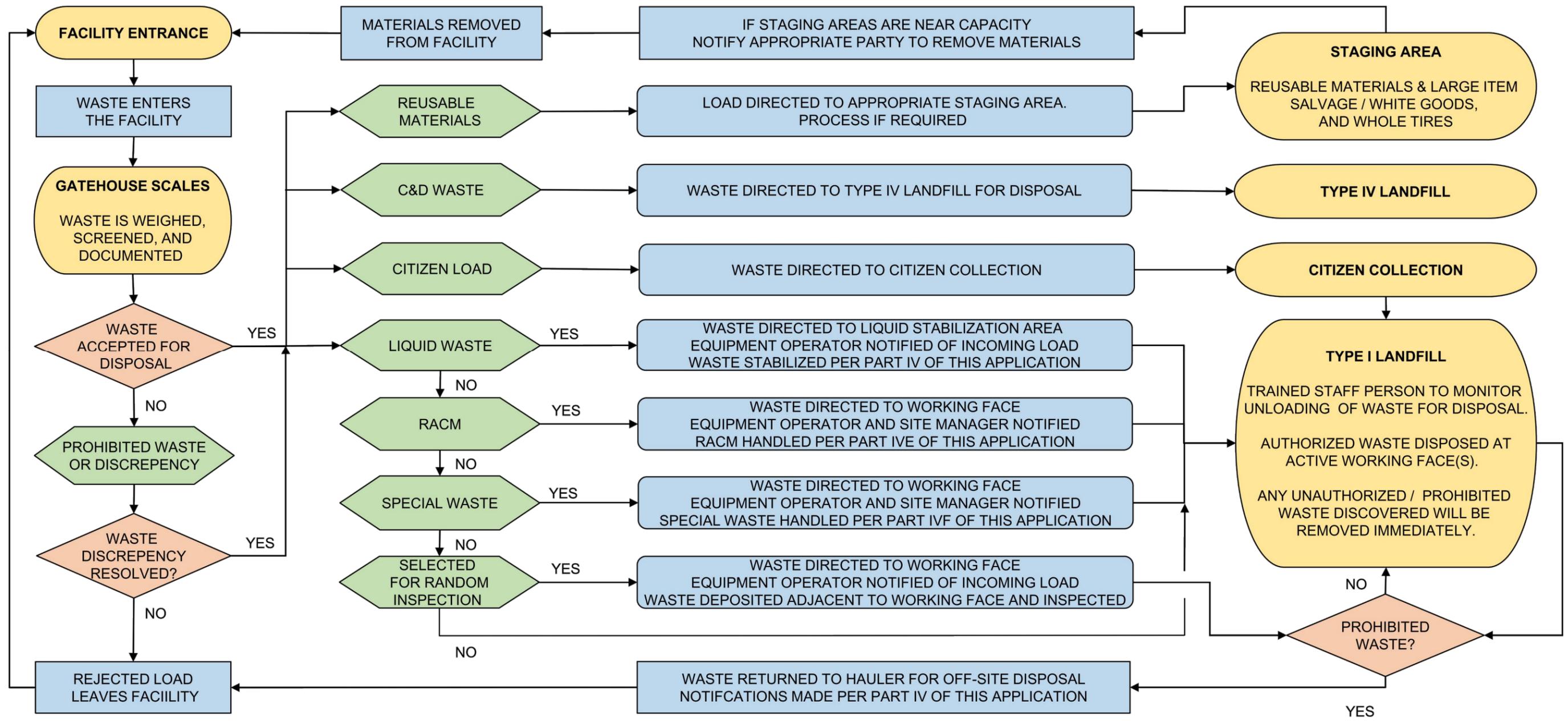
30 TAC §330.63(b)(5)

In response to Texas Parks and Wildlife Department (TPWD) recommendations, the facility will employ best management practices to minimize potential negative impacts to federally-listed and state-listed wildlife to include a “no kill” policy. In addition, the City of Edinburg (City) made an agreement with United States Fish and Wildlife Service (USFWS) to preserve a 200-foot wide corridor of dense native woodland along the northern property boundary established with native vegetation, connecting to the southern property boundary of dense native woodland owned by the City. The facility is designed with the following features to protect endangered species:

- Perimeter fencing, a composite of either a four-foot barbed wire fence or a six-foot chain-link fence, is currently installed around contiguous properties owned by the City. Any four-foot barbed wire fence along the perimeter will be replaced with a six-foot steel-link mesh fence designed to inhibit wildlife from entering project areas.
- Excavations and embankments are to be constructed with side slopes no steeper than 3 feet horizontal to 1 foot vertical to provide an adequate escape for wildlife.

Please refer to Part IIE, Endangered or Threatened Species for response to TPWD recommendations and agreement with USFWS.

- NOTES**
- PER PREVIOUS TCEQ AUTHORIZATION, SCALEHOUSE IS SHARED BY BOTH THE TYPE I AND TYPE IV LANDFILLS OWNED BY THE CITY OF EDINBURG.
  - REFER TO FIGURE III-1-2 FOR LOCATION OF STAGING AREA AND CITIZEN COLLECTION.
  - ACCEPTANCE AND DISPOSAL OF C&D WASTE AT THE ADJACENT TYPE IV LANDFILL IS NOT COVERED BY TCEQ PERMIT MSW-956C.
  - BRUSH WILL BE DIRECTED TO MULCH AREA CURRENTLY LOCATED OVER PRE-SUBTITLE D UNITS 1-4.



ISSUED FOR PERMITTING PURPOSES ONLY

Path: \\nsunat\drafting\_2014\1401491 - city of edinburg\PROJECT\CONNA - Permit Amendment Application - File Name: 1401491\14029.dwg

REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	MGC	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI



CLIENT: CITY OF EDINBURG SOLID WASTE MANAGEMENT

CONSULTANT: Golder Associates

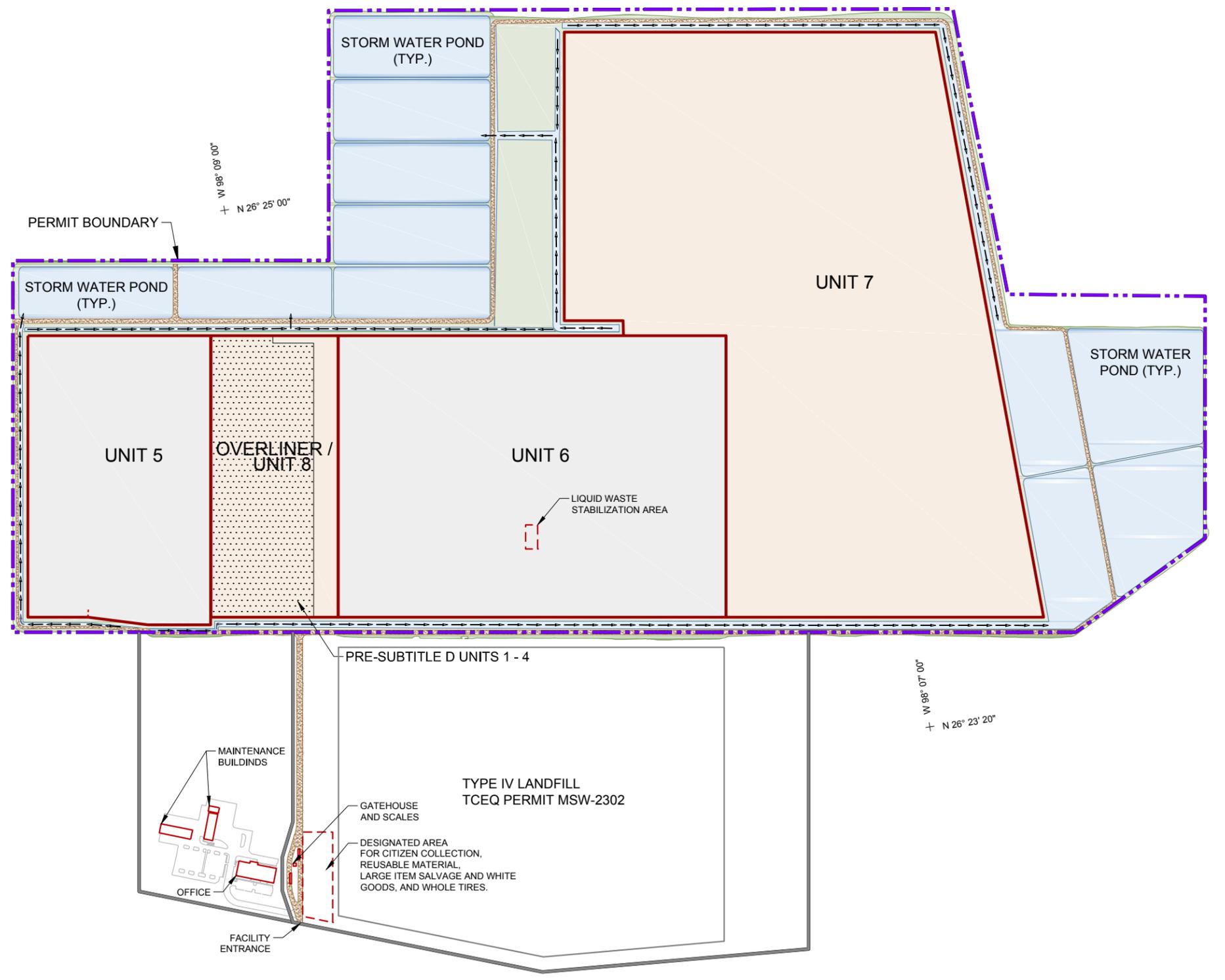
HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT: EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE: WASTE MOVEMENT FLOW DIAGRAM

PROJECT NO. 1401491    APPLICATION SECTION III1    REV. 1    1 of 2    FIGURE III1-1

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

	PERMIT BOUNDARY
	UNIT BOUNDARY
	PRE-SUBTITLE D UNITS 1 - 4
	SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

- NOTE(S)**
1. THE LIQUID WASTE PROCESSING AREA IS WILL BE RELOCATED PERIODICALLY AS THE ACTIVE FACE MOVES AND WILL BE LOCATED ABOVE LINED LANDFILL AREAS.
  2. THE GATEHOUSE AND SCALES AND AREA DESIGNATED FOR CITIZEN COLLECTION, REUSABLE MATERIAL, AND LARGE ITEM SALVAGE AND WHITE GOODS ARE LOCATED WITHIN THE PERMIT BOUNDARY OF TYPE IV LANDFILL TCEQ PERMIT MSW-2302.
  3. UNIT AREAS FOR DISPOSAL OF WASTE ACCEPTED IN ACCORDANCE TO WASTE ACCEPTANCE PLAN IN PART II OF THIS APPLICATION INCLUDING MUNICIPAL SOLID WASTE, RACM, AND OTHER SPECIAL WASTES. NO CLASS I WASTE IS ACCEPTED.
  4. THE MULCH AREA IS CURRENTLY OVER PRE-SUBTITLE D UNITS 1-4.

**ISSUED FOR PERMIT PURPOSES ONLY**



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	MGC	JBF	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	TDS	JBF	CEI

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CONSULTANT

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**SCHEMATIC VIEW OF VARIOUS WASTE DISPOSAL, PROCESSING, AND STORAGE AREAS**

PROJECT NO. 1401491	APPLICATION SECTION III1	REV. 1	2 of 2	FIGURE III1-2
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PERMIT AMENDMENT APPLICATION  
Part III, Attachment 2

# SURFACE WATER DRAINAGE REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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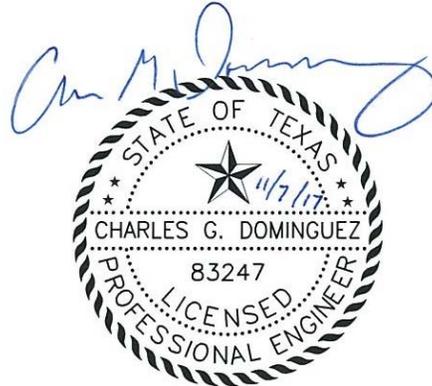
July 2017  
Revised: November 2017

Project No. 1401491



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## **EXECUTIVE SUMMARY**

30 TAC §330.63(c) and 30 TAC Subchapter G

This Surface Water Drainage Report provides a detailed description of the hydrologic and hydraulic analyses performed for the facility design and includes detailed design calculations and operational considerations for the management of site stormwater. As demonstrated, the facility design complies with the requirements of 30 TAC §330.63(c) and 30 TAC 330 Subchapter G, and will not adversely alter existing or permitted drainage patterns. The facility will be constructed, maintained, and operated to manage run-on and runoff during the peak discharge of a 25-year rainfall event and will prevent the off-site discharge of waste and feedstock material, including, but not limited to, in-process and/or processed materials. Surface water drainage within the facility will be controlled to minimize surface water running onto, into, and off the treatment area.

## 1.0 SURFACE WATER DESIGN OVERVIEW

The natural topography in the landfill expansion and surrounding areas is relatively flat. Stormwater runoff generally ponds on site or at depressions along the site boundary, with minimal off-site discharge. The lack of local streams or channels to transport stormwater runoff from the facility necessitates the construction of stormwater storage ponds. Stormwater that is collected in these ponds will evaporate or be used for site operations such as dust control. Under the proposed post-development conditions, the landfill will be encompassed with a perimeter berm along the entire permit boundary, and all stormwater runoff within the berm will be collected and directed to the stormwater storage ponds. There will be no off-site stormwater discharge other than the insignificant runoff from the exterior slope of the perimeter berm to the natural topography.

The surface water design considers flow from both the off-site (run-on) and on-site (runoff) areas contributing to the site. The existing topography at the site does not present any measureable run-on to the site due to the natural grades and existing perimeter berms on parts of the site. On-site stormwater runoff is controlled with a variety of structures that reduce the slopes (and the velocities) at which the water travels. These include add-on berms, downchutes, slope contouring, perimeter drainage ditches, and culverts.

Figure III2-1 presents the locations of the pre-development analysis control points for the site. The pre-development condition is a combination of the previously permitted final cover condition in the TCEQ Permit MSW-956B and the 2015 existing conditions in the expansion area. Figure III2-2 depicts the post-development drainage plan and surface water conveyance structures proposed for the expanded facility.

For landfill development, the landfill final cover has been divided into sections which drain to protected downchutes that extend down the 4 horizontal to 1 vertical (4H:1V) sideslopes. The sideslopes of the final cover have add-on berms sloped at 2 percent at 40-foot vertical intervals down the 4H:1V slopes. These add-on berms collect the stormwater from the sideslopes and convey it to the downchutes. The downchutes discharge into perimeter channels which then convey the flows to the stormwater storage ponds.

The current TCEQ Permit MSW-956B permits two stormwater storage ponds: the existing West Pond and the proposed East Pond. The existing West pond will be reconstructed per the final landfill development. The East Pond designed in TCEQ Permit MSW-956B has not been and will not be constructed. The final landfill development (TCEQ Permit MSW-956C) will include 11 stormwater ponds: seven ponds on the west side (Ponds W1 through W7) and four ponds on the east side (Ponds E1 through E4). Figure III2-2 shows the locations of the stormwater ponds. The ponds are designed to retain runoff from the 25-year, 24-hour storm.

Figures III2-3 through III-2-5 present the add-on berm, perimeter channels, downchute, and culvert details. Figures III2-6 through III-2-8 present the pond details. Figures III2-9 through III-2-13 depict flowline elevations, water surface elevations, and velocities along the entire length of the drainage structures. Figures III2-14 and III2-15 shows details for erosion and sedimentation control.

## 2.0 DETAILED DRAINAGE CALCULATIONS

Appendix III2A, Detailed Drainage Calculations includes following hydrologic and hydraulic analyses:

- Estimation of pre-development run-on and runoff peak flows and volumes using the US Soil Conservation Service (SCS) Technical Release Number 55 (TR-55), the SCS hydrograph methodology, and the US Army Corps of Engineers' (USACE) Hydrologic Engineering Center Hydrologic Modeling System (HEC-HMS) computer software;
- Similar estimation of post-development peak flows and volumes at defined control points using TR-55, the SCS hydrograph methodology, and the HEC-HMS computer software;
- Estimation of pre-development velocities at runoff control points (there is no post-development runoff resulting from the 25-year, 24-hour design storm);
- Design of add-on berms, downchute channels, culverts, and perimeter channels;
- Estimation of the water surface elevation resulting from the 25-year recurrence interval 24-hour design storm per TCEQ and the City of Edinburg requirements in the perimeter channels using Manning's Equation assuming normal depth;
- Estimation of the water surface elevation resulting from the 25-year, 24-hour storm event for the downchutes and add-on berms using Manning's Equation assuming normal depth; and
- Development of required storage for the proposed Ponds utilizing the HEC-HMS computer software and spreadsheet stage-storage calculations for the 25-year, 24-hour storm.

### 2.1 Hydrologic Methods

#### 2.1.1 Drainage Modeling System

30 TAC §330.305(f)(2)

The facility is greater than 200 acres. Therefore, calculations for discharges are computed using USACE HEC-HMS (Hydrologic Engineering Center-Hydrologic Modeling System).

#### 2.1.2 25-year Rainfall Intensity

30 TAC §330.63(c)(1)(D)(i)

Rainfall intensity for a 25-year, 24-hour storm event from the Natural Resources Conservation Service (NRCS) (formerly called the Soil Conservation Service (SCS)) Technical Release 55 (TR-55) published in 1986 was used for facility stormwater drainage design. In Hidalgo County, the 24-hour rainfall events have an SCS Type III synthetic temporal distribution with rainfall depths of 4.3, 8.5, and 11.0 inches for the 2-, 25-, 100-year events respectively. Composite SCS curve numbers were estimated consistent with previous

work and local regulations. Selected hydrologic methods and input parameters are presented in Appendix III2A, Detailed Drainage Calculations.

### 2.1.3 Peak Flow Rates and Runoff Volumes

30 TAC §330.63(c)(1)(D)

The HEC-HMS hydrologic model was used to determine the peak flows and volumes resulting from the 25-year, 24-hour design storm. The NRCS unit hydrograph transformation methodology was used for all drainage basins. Times of concentrations were calculated using TR-55 methodology. Peak flow rates were used to design stormwater channels required in the drainage design (perimeter channels, downchutes, and add-on berms). Channel calculations were performed using a spreadsheet that solves Manning's equation for normal depth. Culvert sizing calculations were carried out using HY-8 software developed by the U. S. Department of Transportation Federal Highway Administration. Peak flow rates and runoff volumes are included in Appendix III2A, Detailed Drainage Calculations.

## 2.2 Drainage Pattern Analyses

30 TAC §§330.63(c)(1)(C), 330.63(c)(1) (D)(iii) & 330.305(a)

Existing drainage patterns will not be adversely altered as a result of the proposed landfill development as demonstrated in the comparison of peak flow rates, runoff volumes, and velocities in the pre-development and post-development conditions. Analysis points were located for the pre-development and post-development conditions to represent locations where run-on flows enter the site or runoff exits the site. The analysis points and contributing drainage areas are shown on Figure III2-1, Pre-Development Drainage Plan and Figure III2-2, Post-Development Drainage Plan.

The determination of no adverse alteration of drainage patterns is based on three factors related to discharge of surface water: 1) peak flows, 2) velocities, and 3) volumes as measured at the permit boundary. The pre-development condition at the facility has only two discharge points – one at CP-3 and one at CP-9. In addition, there is one discharge point at CP-7 where water accumulates at a depression along the permit boundary. The following bullets address these three discharge points:

- CP-3: In the pre-development condition an approximately 8-acre area drained to a depression just west of the permit boundary in this part of the site. In the post-development condition the contributing area to this discharge point is routed to an on-site stormwater pond used to manage surface water. As a result, the flow to this depression is redirected to the pond. This does not impact a receiving stream or channel downstream as there is not one. The discharge velocity decreases from a non-erosive velocity to zero, resulting in minimal change in post-development conditions related to velocity. The volume of discharge is likewise routed to the stormwater pond and does not pond in the off-site depression, and does not adversely impact existing drainage patterns because the discharge volume is lower than in pre-development conditions and has no apparent beneficial use.

- CP-9: In the pre-development condition an approximately 8-acre area drained off site to the south. The elimination of this discharge does not impact a receiving stream or channel downstream as there is not one. The discharge velocity decreases from a non-erosive velocity to zero, resulting in minimal change in post-development conditions related to velocity. The removal of the volume of discharge at this location does not adversely impact existing drainage patterns because the discharge volume is lower than in pre-development conditions and has no apparent beneficial use.
- At discharge point CP-7 there is a depression in the surface topography where runoff ponds along the permit boundary. In the pre-development condition, the contributing area for this runoff is 19.8 acres. The post-development condition reduces this contributed area to 6.3 acres, but does not alter the drainage pattern into the depression. Since the contributing area is lower, the peak flows, velocities, and volumes will all be lower and therefore do not adversely alter existing drainage patterns. There is no apparent beneficial use of the runoff at this location either, therefore the reduced runoff volume does not have any adverse alteration to the drainage patterns.

### 2.2.1 Drainage Areas

30 TAC §330.63(c)(1)(A)

The pre-development and post-development contributing areas for all analysis points were evaluated. Subbasins for the pre-development condition were delineated using the final cover grades and drainage design within approved TCEQ Permit MSW-956B and existing topography within the lateral expansion area as shown on Figure III2-1, Pre-Development Drainage Plan. Likewise, subbasins for the post-development condition were delineated using the final cover design, the stormwater conveyance structure design (add-on berms, downchutes, perimeter channels, culverts, etc.), and existing topography as shown on Figure III2-2, Post-Development Drainage Plan. As demonstrated in Table III2-1, analysis points CP-3 and CP-9 are the only relevant off-site discharge points in the pre-development condition.

**Table III2-1: Summary of Contributing Areas**

Analysis/Control Point	Contributing Area (acre)		Runoff Flow Pattern during Pre-development Conditions
	Pre-Development	Post-Development	
CP-1	19.7	0	Ponding on-site
CP-2	205.8	276.9 (total to the west ponds)	
CP-3	8.2	0	Discharges to an off-site depression adjacent to Permit Boundary
CP-4	5.9	0	Accumulate at depressions along permit boundary
CP-5	59.9	0	
CP-6	84.5	0	
CP-7	19.8	6.3	
CP-8	19.3	319.3 (total for the east ponds)	Ponding on-site
CP-9	8.3	0	Discharges off-site
CP-10	39.9	0	Ponding on-site

CP-11	72.0	0	
CP-12	24.4	0	
CP-13	34.9	0	
Total Area	602.6	602.5	

Note: As shown above, CP-3 and CP-9 are the only relevant off-site discharge points during pre-development conditions. The total contributing area obtained by summing the areas contributing to CP-1 through CP-13 is 602.56 and 602.38 acres, for pre-development and post-development, respectively. There is a 0.02 percent difference in total area between pre- and post-development contributing areas. This insignificant difference is a result of numerical rounding of the areas of numerous small sub-basins. Figures III2-1 and III2-2 depict the pre- and post-development drainage maps and show all contributing areas.

### 2.2.2 Peak Discharges

30 TAC §330.63(c)(1)(D)

Using the drainage contributing areas and associated flows to analysis points; peak discharges were computed for the pre- and post-development conditions. The pre-development condition shows minor discharges at control points CP-3 and CP-9. In the post-development condition, stormwater flows are routed through the surface water conveyance system (add-on berms, downchutes, perimeter channels, culverts, etc.) and collected and stored in the stormwater ponds, except an insignificant amount of runoff from the exterior slope of the perimeter berm. As demonstrated in Table III2-2, the post-development flows, volumes, and velocities are less than pre-development at both control points CP-3 and CP-9.

**Table III2-2: Summary of Peak Flow Rates, Runoff Volumes, and Velocities**

Control Point	25-year, 24-hour Storm Event					
	Pre-Development Peak Flow Rate (cfs)	Post-Development Peak Flow Rate (cfs)	Pre-Development Runoff Volume (ac-ft)	Post-Development Runoff Volume (ac-ft)	Pre-Development Velocity (ft/sec)	Post-Development Velocity (ft/sec)
CP-1	47.5	Routed to west ponds	9.8	-	-	-
CP-2	548.8		115.2	164.9 (total for west ponds)	-	-
CP-3	32.5		4.1	-	2.3	0
CP-4	21.0		2.9	-	-	-
CP-5	226.4		29.8	-	-	-
CP-6	250.6	Routed to east ponds	42.1	-	-	-
CP-7	51.1	19.5 (partially routed to east ponds)	9.8	3.9 (partially routed to east ponds)	-	-
CP-8	55.6	Routed to east ponds	9.6	187.7 (total for east ponds)	-	-

Control Point	25-year, 24-hour Storm Event					
	Pre-Development Peak Flow Rate (cfs)	Post-Development Peak Flow Rate (cfs)	Pre-Development Runoff Volume (ac-ft)	Post-Development Runoff Volume (ac-ft)	Pre-Development Velocity (ft/sec)	Post-Development Velocity (ft/sec)
CP-9	19.6		4.1	-	1.6	0
CP-10	117.6		19.9	-	-	-
CP-11	324.0		41.0	-	-	-
CP-12	89.3	Routed to west ponds	10.2	-	-	-
CP-13	117.9		17.4	-	-	-

Notes:

cfs = cubic feet per second  
ac-ft = acre-feet  
Discharge velocities are calculated for discharge points only.  
CP-2 is used to represent the west ponds; CP-8 is used to represent the east ponds.

## 2.3 Stormwater Collection, Drainage, and Detention Structures

30 TAC §§330.63(c)(1)(D)(ii) & 330.63(c)(1)(D)(iv)

Stormwater is collected and conveyed into stormwater ponds by add-on berms, downchutes, perimeter channels, and culverts. Stormwater collection and drainage structures were designed using Manning’s Equation assuming normal depth from the design storm event.

### 2.3.1 Perimeter Channels

30 TAC §330.63(c)(1)(B)

The perimeter channels collect stormwater for conveyance into stormwater ponds. They are generally trapezoidal in shape, designed with uniform slopes of 0.1 to 0.15 percent, variable bottom widths, and variable depths allowing a minimum of 0.5 feet of freeboard for the design storm event. Perimeter channels are grass-lined for areas where the velocity is no greater than 5 feet per second and lined with riprap for areas with a greater velocity.

Perimeter channel locations are depicted on Figure III2-2, Post-Development Drainage Plan. A typical detail is shown on Figure III2-3, Drainage Control Details I – Channels and Berms along with a schedule that describes the size, slope, water elevations, flow velocity, channel lining, and length for each channel. Flowline profiles showing grades, flow rates, water surface elevations, velocities, and flowline elevations along the entire length for the stormwater perimeter channels are provided in Figures III2-9 and III2-10.

### 2.3.2 Add-on Berms

Add-on berms are designed with a uniform slope of 2 percent to keep flow velocities below 5 feet per second. The channels formed by the add-on berms with an internal 2H:1V sideslope have a depth of 2 feet

allowing 0.5 feet of freeboard for the design storm event. Add-on berm locations are depicted on Figure III2-2, Post-Development Drainage Plan and add-on berm details are presented on Figure III2-3, Drainage Control Details I – Channels and Berms.

### 2.3.3 Downchutes

Downchutes are designed with a maximum slope of 25 percent and are formed by side berms with an internal 2H:1V sideslopes and a design depth allowing 0.5 feet of freeboard for the design storm event. Downchute channels are lined with 60-mil textured geomembrane; however a suitable alternative to geomembrane may be used provided that the design is verified by a professional engineer. Stormwater flow from the downchutes channel through energy dissipation structures into a low water road crossing before discharging into either a perimeter channel lined with riprap or directly into a stormwater pond.

Downchute locations are depicted on Figure III2-2, Post-Development Drainage Plan. A typical detail is shown on Figure III2-4, Drainage Control Details II – Stormwater Downchute Details and Crossings along with a schedule that describes the size, slope, water elevations, flow velocity, and length for each downchute. Flowline profiles showing grades, flow rates, water surface elevations, velocities, and flowline elevations along the entire length for the downchutes are provided in Figures III2-11 through III2-13.

### 2.3.4 Culverts

Adequacy of both existing and design culverts were evaluated using the Federal Highway Administration's HY-8 Culvert Analysis software. Culvert locations are depicted on Figure III2-2, Post-Development Drainage Plan. Typical culvert details are shown on Figure III2-5, Drainage Control Details III – Culverts.

### 2.3.5 Stormwater Ponds

Stormwater is collected into 11 ponds: 7 are located west of Unit 7 and north of Units 1 – 6 designated as Ponds W1 – W7; and 4 are located east of Unit 7 designated as Ponds E1 – E4 as depicted on Figure III2-2, Post-Development Drainage Plan. Figure III2-6, Drainage Control Details IV - West Ponds and Sections and Figure III2-7, Drainage Control Details V - East Ponds and Sections show pond profiles; and Figure III2-8, Drainage Control Details VI – Pond Details provides pond dimensions and design elevations. The ponds will be constructed in a phased manner as needed to contain the stormwater runoff on-site as dictated by the extent of landfill development. The stormwater ponds will be lined with 60-mil HDPE in accordance with Part III3F, Liner Quality Control Plan. Hydrostatic uplift of the stormwater pond liner is not anticipated because the pond liner is above seasonal high groundwater levels.

Based on the runoff volume of the receiving areas, the ponds will be interconnected via equalization pipes as follows: Ponds W1 through W3 will be equalized; Ponds W4 through W6 will be equalized; and Ponds E1, E2, E3, and E4 will be equalized. The estimated maximum water elevations for design storm event in feet above mean sea level (ft-msl) are summarized in Table III2-3. Comparison of the maximum water

elevations in the ponds and the pond crest elevations demonstrates that the ponds have sufficient storage capacity and freeboards ranging from approximately of 5 feet to over 10 feet. Such design ensures the ponds have adequate capacity for more severe storms or consecutive storms. The designed ponds have adequate capacity to contain runoffs from two consecutive 25-year 24-hour storms as shown in Table III2-4. Furthermore, Pond W7 is not required for the design storm event, rather it is designed as a contingency to provide additional storage capacity in case of extreme weather conditions. Pond W7 may be equalized with Ponds W4 through W6 when needed or may be utilized by pumping stormwater from other ponds under extreme weather conditions.

**Table III2-3: Pond Water Elevations for 25-Year, 24-Hour Storm**

Pond	Runoff Volume (ac-ft)	Maximum Pond Water El. (ft-msl)	Minimum Elev.of the Pond Levee (ft-msl)	Pond Freeboard (ft)
	25-year 24-hour storm	25-year 24-hour storm	-	25-year 24-hour storm
W1	29.2	85.1	91.0	5.9
W2	37.0	85.1	91.0	5.9
W3	6.5	85.1	91.0	5.9
W4	7.1	84.3	91.0	6.7
W5	7.1	84.3	91.0	6.7
W6	70.2	84.3	91.0	6.7
W7	7.8	78.5	91.0	12.5
E1	80.9	77.4	94.0	16.6
E2	87.2	77.4	94.0	16.6
E3	11.1	77.4	94.0	16.6
E4	8.5	77.4	94.0	16.6

**Table III2-4: Pond Storage Capacity Vs. Two 25-Year, 24-Hour Storms**

Pond	Runoff Volume (ac-ft)	Pond Storage Capacity (ac-ft)	Adequate Capacity to Contain Runoffs from Two 25-year 24-hour Storms?
	Two 25-year 24-hour Storms	-	
W1 through W3	146	220	YES
W4 through W6	170	283	YES
E1 through E4	374	882	YES

The semi-arid climate at the site allows for the evaporation pond design. The majority of the water in the ponds will evaporate, while a smaller portion will be used for site operations such as dust control. According

to the 61-year historical weather data (from 1954 to 2014) published by Texas Water Development Board, the average annual lake evaporation rate is 62.60 inches and the average annual precipitation is 21.70 inches. The weather conditions combined with the pond system design will ensure adequate storage and evaporation capacity at the site.

Further analysis has been performed to demonstrate the long-term performance of the ponds under the post-development conditions. The analysis uses the 61-year historical weather data to model the pond performance with consideration of evaporation. For conservative purposes, it is assumed that the average monthly rainfall will occur within a 24-hour time period and the fact the water may be used for irrigation of the final cover vegetation is omitted. As demonstrated in Appendix III2G, all ponds will have adequate long-term storage capacity for 30 years under the post-developments conditions. For the west ponds, Pond W1 through W6, the average annual evaporation potential surpasses the annual stormwater runoff volume. For the east ponds, Ponds E1 through E4, stormwater runoff may accumulate in the ponds, however, the pond capacity still exceeds the estimated stormwater volume in the ponds after 30 years. Beyond 30 years, i.e. at the end of post-closure care period, use of the pond water may be re-evaluated in conjunction with the land use at the time.

### **3.0 CONTAMINATED SURFACE WATER OR GROUNDWATER**

30 TAC §330.305(g)

The City shall handle, store, treat, and dispose of surface or groundwater that has become contaminated by contact with the working face of the landfill or with leachate in accordance with 30 TAC §330.207, Contaminated Water Management.

#### **3.1 Contaminated Water Storage Area Design**

30 TAC §330.305(g)

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 and non-contact stormwater. Daily disposal operations will include an evaluation of the existing containment berm's capability to manage stormwater run-on and runoff.

##### **3.1.1 Run-on Control System**

30 TAC §330.305(b)

The City shall design, construct, and maintain a run-on control system capable of preventing flow onto the active portion of the landfill during the peak discharge from at least a 25-year rainfall event. The run-on berms are designed to accommodate the 25-year, 24-hour storm, the equivalent of an 8.5-inch rainfall event

to divert uncontaminated stormwater from upstream watersheds around the working area. The run-on berm height requirements and design configurations are detailed in Appendix III2B, Active Face Berm Sizing.

### **3.1.2 Runoff Management System**

30 TAC §330.305(c)

The City shall design, construct, and maintain a runoff management system from the active portion of the landfill to collect and control at least the water volume resulting from a 24-hour, 25-year storm. The run-off berms are designed to accommodate the 25-year, 24-hour storm, the equivalent of an 8.5-inch rainfall event to provide adequate storage of stormwater that has potentially contacted the open working face. The run-off berm height requirements and design configurations are detailed in Appendix III2B, Active Face Berm Sizing.

## **4.0 EROSION AND SEDIMENT CONTROL**

30 TAC §§330.305(d), 330.305(d)(1), & 330.305(d)(2)

The landfill design provides effective erosional stability to top dome surfaces and external embankment side slopes during all phases of landfill operation, closure, and post-closure care. Estimated peak velocities for top surfaces and external embankment slopes are less than the permissible non-erodible velocities under similar conditions. The top surfaces and external embankment slopes area designed to minimize erosion and soil loss through the use of appropriate side slopes, vegetation, and other structural and nonstructural controls, as necessary. Soil erosion loss (tons/acre) for the top surfaces and external embankment slopes were calculated and the potential soil loss does not exceed the permissible soil loss for comparable soil-slope lengths and soil-cover conditions.

### **4.1 Applicability**

According to the 2007 draft TCEQ guidance for addressing erosional stability during all phases of landfill operation, the landfill cover phases are defined as daily cover, intermediate cover, and final cover. Top dome surfaces and external embankment sideslopes are defined as:

- Those above-grade slopes that directly drain to the perimeter stormwater management system (i.e., directly to a perimeter channel or a detention pond).
- Those above-grade slopes that have received intermediate or final cover.
- Those above-grade slopes that have either reached their permitted elevation, or will subsequently remain inactive for longer than 180 days.

Slopes not addressed above that drain into active areas, excavations or areas under construction, or areas that have only received daily cover (short-term), are not considered external slopes and are not required to maintain the erosion management practices outlined in this plan. An area under daily cover that remains

inactive for longer than 180 days will be converted to intermediate cover and those applicable erosion controls, as discussed in the following sections, will be required.

## **4.2 Erosion and Sedimentation Control Plan**

This plan is organized to present the erosion and sediment control design and best management practices (BMPs) for all three landfill conditions: active disposal areas, intermediate cover areas, and final cover areas. The erosion and sedimentation controls were developed to provide low runoff velocities, adequate storage detention, and to limit sediment and soil loss impacts to stormwater discharge quality. Soil erosion loss was estimated utilizing the Texas Natural Resource Conservation Commission's "Use of the Universal Soil Loss Equation in Final Cover/Configuration Design," Procedural Handbook, Permits Section, Municipal Solid Waste Division, October 1993. The selection of erosion and sediment control structures will be a continual evolution of temporary and permanent control devices. The facility fill sequence plans will be used to manage the proper selection of both temporary and permanent erosion and sediment controls to ensure stormwater quality standards as presented in the facility's stormwater discharge permit. Temporary (short-term) erosion controls will typically be used during landfill operations, and permanent (long-term) controls will be used for final cover conditions. Temporary erosion controls are defined as controls that are installed or constructed within 180 days from when the intermediate cover is constructed and in place until permanent controls are constructed for the final cover or additional placement of waste is resumed on the intermediate cover area.

Some typical controls have been selected and evaluated for typical site operations. Any controls that the site manager chooses to use which are not specifically addressed in this plan shall be evaluated for equivalency. Equivalency demonstrations that verify effectiveness of performance and durability will be kept in the site operating record. Furthermore, any control measures and practices used in keeping soil loss and flow velocity within permissible limits prior to the establishment of vegetation or in conjunction with vegetation not approved with this plan, must be approved by the TCEQ prior to implementation.

## **4.3 General Erosion and Sedimentation Assessment**

In assessing the landfill construction and operational practices for potential erosion and sedimentation, the site will consider potential impacts to sensitive areas, such as steep slopes, surface waters, areas with erodible soils, and existing discharge channels. Also, the facility will disturb the smallest vegetated area reasonably possible, keep the amount of cut and fill to a minimum, and maintain the aforementioned sensitive areas. During the construction of landfill cells, it will be necessary to disturb the soil by clearing and grubbing, excavating and stockpiling, rough and final grading, constructing perimeter channel(s), and seeding and/or planting. The BMPs described in the following sections will be utilized to ensure minimal impacts to stormwater quality during these phases of construction and stockpiling activities. Standard TxDOT specifications of these BMPs are included in Appendix III2D, Example BMP Specifications.

To guard against soil loss, the phased development plan for landfill cell construction and solid waste placement will be followed. The figures in Part II, §3.0 Facility Layout Plan describe in detail the planned sequence of development, including sequencing of drainage and runoff controls, to ensure adequate slope stability and limited erosion and soil loss.

#### 4.4 Erosion and Sediment Control for Intermediate Cover Areas

30 TAC §330.305(e)(2)

This sub-section describes the interim controls that may be used during phased landfill development to minimize erosion of top dome surfaces and external embankment sideslopes with intermediate cover or that have reached the permitted elevations. Based on velocity and soil erosion analyses, a selection of BMPs is identified and general installation guidance is provided. Examples of standard published specifications are also provided. Standard published specifications, which will be discussed in the following sections, are provided in Appendix III2D, Example BMP Specifications. In accordance with 30 TAC §330.165(c) and TCEQ guidelines, temporary erosion and sedimentation controls will be implemented on intermediate cover areas within 180 days after placing intermediate cover, including a vegetative cover of at least 60 percent. Depending on the weather conditions and the season of the year when the intermediate cover is placed, methods of temporary control, as discussed in the following sections, will be implemented to provide for erosion protection. Pursuant to TCEQ guidelines, all calculations in support of this erosion and sedimentation control plan are based on 60 percent cover.

##### 4.4.1 Erosion and Sedimentation Control Design – Intermediate Cover Areas

Since the exact conditions of the various interim conditions are impossible to predict due to daily changes in fill patterns, a conservative approach is taken to determine the worst-case slope conditions. Therefore, the built-out condition of the final cover scenario is used as the worst-case slopes. are determined from this scenario. Even though interim conditions that are this extreme are unlikely, this is a conservative assumption so that any possible interim slope conditions or lengths are covered by this extreme case. In accordance with 30 TAC §330.305(d), the effective erosional stability of top dome surfaces and external embankment side slopes of landfill operation, closure, and post-closure care was analyzed based on the following criteria:

- The estimated peak velocity should be less than the permissible non-erodible velocities under similar conditions. The applicable non-erodible velocities are 3.75 feet per second for bare soil slopes and 5.0 feet per second for grassed (60 percent vegetation) slopes, considering the soil types, grass types, grass conditions, and slope angles at the facility (refer to Appendix III2C, Interim Erosion and Sediment Control Analysis).
- The potential soil erosion loss should not exceed the permissible soil loss for comparable soil-slope lengths and soil-cover conditions. The 2007 TCEQ guidance document has specified that the permissible soil loss is not to exceed 50 tons/acre/year and the recommended cover is 60 percent.

The top dome surface is sloped at 5 percent with a maximum length of approximately 114 feet. The external embankment sideslopes are 4H:1V slopes. Analysis indicates that the stormwater velocity on the top dome surfaces will not exceed the permissible non-erodible velocity in the worst-case conditions, and the length of the 4H:1V slope will be limited to 240 feet to satisfy the flow velocity criteria. The velocity analyses are included in Appendix III2C, Interim Erosion and Sediment Control Analysis and are summarized in Table III2-5.

**Table III2-5: Summary of Interim Slope Velocities**

Cover Slope	Slope Segment	Flow Velocity (fps)
5% slope	Segment 1 ~114 ft	0.85
4H:1V slope	Segment 1 0–240 ft	1.89

If an intermediate slope in excess of 240 feet is constructed, then a portion of the slope must be converted to final cover with permanent erosion controls, or temporary soil berms can be installed at 60-foot vertical intervals (i.e. 240 feet along the slope) along the intermediate cover slopes.

The potential soil erosion loss was calculated using the Natural Resources Conservation Service of the United States Department of Agriculture (USDA) Revised Universal Soil Loss Equation (RUSLE). A permissible soil loss of 50 tons/acre/year and a cover of 60 percent are selected as the design criteria for interim erosion and sediment controls. Results of the soil erosion analyses demonstrate that both the top surfaces and the external embankment sideslopes can achieve effective erosional stability without any stormwater diversion structures provided that the soil surfaces are stabilized with at least 60 percent ground cover. Furthermore, since the flow velocities are the governing parameter for the maximum length of the 4H:1V slopes between the soil berms, the actual amount of soil loss will be reduced. Limiting the uninterrupted length of 4H:1V slopes to a maximum of 240 feet will reduce the maximum soil loss on the intermediate slopes to approximately 18.7 tons/acre/year.

The analyses for interim erosion and sediment controls are included in Appendix III2C-1, Intermediate Cover Soil Erosion Loss Analysis.

#### **4.4.2 Erosion and Sedimentation Control BMPs – Intermediate Cover Areas**

There are numerous BMPs that can be implemented during landfill operations to meet the soil stabilization and stormwater diversion requirements. These BMPs can be used prior to establishing vegetation or in conjunction with vegetation. The selected BMPs for this site are commonly used and are discussed below. The common BMPs discussed below include a specification and/or detail for reference. The controls discussed below are available from several manufacturers. The site manager has the flexibility to purchase

a control similar to that specified from any manufacturer based on local availability and/or cost. Any other BMPs that may not be commonly used today, such as new technologies as they become available, may be implemented if they are proven to provide satisfactory ground cover and effective erosion controls. The evaluation for effectiveness and the demonstration of equivalency of erosion and sediment control BMPs that are not included in this plan will be maintained within the facility's site operating record, furnished upon request to the TCEQ, and made available for inspection by TCEQ personnel, as necessary. Furthermore, any control measures and practices used to keep soil loss and flow velocity within permissible limits prior to establishing vegetation or in conjunction with vegetation not approved with this plan, must be approved by the TCEQ prior to implementation.

#### 4.4.2.1 Soil Surface Stabilization

Intermediate cover will be temporarily stabilized during installation and maintained throughout facility operations. Erosion and sedimentation controls will be implemented on intermediate covers within 180 days after placing intermediate cover, in accordance with 30 TAC §330.165(c). The soil surface stabilization BMPs that may be implemented at the site are listed below. Vegetation is the most effective erosion control, but until this is achieved, geosynthetics may be used to stabilize the surface of the soil until vegetation can root, spread, and properly grow. These stabilization materials will be removed, if applicable, once the required 60 percent cover is established.

- Vegetation – Vegetative cover reduces erosion potential by shielding the soil surface from the direct erosive impact of raindrops, improving the soil's porosity and water storage capacity so more water can infiltrate, slowing the runoff, allowing the sediment to drop out, and physically holding the soil in place with plant roots. Grass types that are suitable for the area will be selected in accordance with guidelines published by the state or local agency or other similar sources. The standard seeding specification published by TxDOT is provided in Appendix III2D, Example BMP Specifications.
- Mulch – Mulching is the application of a layer of organic, biodegradable material that is spread over areas where vegetation is not yet established. Types of mulch include compost, straw, wood chips, or manufactured products. Mulch application can be in dry or hydraulic forms. When applied dry, the thickness of the mulch will vary depending on the type of mulch applied. Primary-grind mulch (e.g., wood shreds that form a mass of intertwined fragments) used primarily for erosion control, will be applied using spreading equipment, such as a bulldozer, at a minimum thickness of 2 inches. Compost material, which may consist of more finely ground mulch, will be applied using mechanical spreaders or sprayers. A tackifier or binder may be used to increase the strength and durability of the mulch. Hydraulic mulch includes hydromulch, bonded fiber matrix, flexible growth medium (FGM), and other commercially available products. Hydraulic mulch includes a tackifier or binder that increases the strength and durability of the mulch. Seeds can be applied to the soil first or mixed into the hydraulic mulch. The application method and application rate of hydraulic mulch will be based on manufacturers' recommendations to ensure a uniform and complete coverage. The application method and rate of mulch for other products will be in accordance with that particular product's specifications and recommendations.
- Geosynthetics – Geosynthetic products available for soil erosion controls include geotextile, geomembrane, rolled-erosion control products (RECPs), etc. Erosion control blankets and turf reinforcement mats are examples of the RECPs. Erosion control blankets

include straw or other mulch material stitched with degradable thread to a photodegradable polypropylene netting structure. The standard specification for rolled erosion control products published by the Erosion Control Technology Council is provided in Appendix III2D, Example BMP Specifications. There are numerous products available on the market that can be used. Any material specifically chosen by the site based on cost or local availability will be installed in accordance with that particular manufacturer's specifications and recommendations.

#### 4.4.2.2 Temporary Stormwater Diversions and Sediment Control Structures

Examples of the temporary stormwater diversion and sediment control structures that will be used on the intermediate cover areas are presented below. These structures can be used both prior to and after establishing cover.

- Soil Berms – Soil diversion berms (i.e., temporary add-on berms) are constructed with compacted on-site soils to intercept the flow on the slope and convey the flow laterally to a downchute. The berm design will be minimum 2-feet high, as measured from the invert of the channel to the top of berm, with the invert sloped at 2.0 percent in the direction of flow. The slopes of the soil berms will be stabilized with vegetation, mulch, or geosynthetics. The maximum berm length will be controlled to limit the drainage area to less than 4.6 acres, as demonstrated in the calculation included in Appendix III2C-2, Intermediate Cover Soil Berm Calculation. This limit is based on the channel flow capacity, including a maximum flow velocity of 5.0 feet per second, and the rainfall intensity for Hidalgo County. These temporary soil berms will be constructed in the same manner as the permanent soil berms on the final cover. A detail of the temporary soil berms is shown on Figure III2-15.
- Silt Fences – Silt fences or fabric filter fences may be used along the slope to intercept the flow and capture the sediment. The maximum drainage area captured by the silt fence should not exceed the manufacturer's specification, but should also be limited to 0.5 acre per 100 feet of fence. The standard specification and detail drawing published by City of Edinburg is provided on Figures III2-14 and III2-15.
- Hay Bales – Hay bales may be used along the slope, perpendicular to the flow to intercept the flow and capture the sediment, similar to the function of a silt fence. The standard specification and detail drawing published by City of Edinburg is provided on Figures III2-14 and III2-15.
- Biodegradable Logs or Organic Berms – These types of diversion structures are alternatives to traditional silt fences and hay bales. The biodegradable logs or organic berms are placed along the slope contours to catch the sediment from sheet flow and allow the stormwater to flow through at a reduced speed. A biodegradable log consists of mulch contained in a synthetic mesh sock or tube. The logs are installed on the slope with stake anchors. Organic berms are constructed of compost/mulch. A specification for the compost/mulch filter berm published by TxDOT is included in Appendix III-2D, Example BMP Specifications. Any type of biodegradable log or organic berm may be used as long as it is installed in accordance with the manufacturer's specifications and recommendations. The standard specification and detail drawing published by City of Edinburg is provided on Figures III2-14 and III2-15.

#### 4.4.2.3 Additional Erosion and Sedimentation Control BMPs

In addition to the soil stabilization and stormwater diversion BMPs listed above, the site has 11 stormwater holding ponds, which will provide stormwater storage capacity and sediment control.

Temporary downchutes will be required when soil diversion berms are installed. Based on the calculations included in Appendix III2C-2, Intermediate Cover Soil Berm Calculation the maximum allowable drainage area for the soil diversion berms yields a maximum berm length of 835 feet (corresponding to the maximum drainage area of 4.6 acres). The temporary downchute will be installed at the termination of the temporary soil diversion berm as necessary to collect runoff from the intermediate slope surface. The recommended minimum temporary downchute channels are 2-feet deep, with 2H:1V sideslopes. The downchute width will be determined based on the contributing drainage area as demonstrated in Appendix III2C-3, Intermediate Cover Downchute Channel Calculation. A geosynthetic lining material (e.g., geomembrane sheet) will be used to line the temporary downchute channels. The hydraulic design of the temporary downchutes is included in Appendix III2C-3, Intermediate Cover Downchute Channel Calculation. A detail of the temporary downchute channels is shown on Figure III2-15, Erosion and Sedimentation Control Details - II. In lieu of downchute channels, corrugated plastic downchute pipes or metal pipes with equivalent flow capacity may be used. If pipes are used as downchutes, the demonstration of equivalency of downchute pipes will be maintained within the facility's site operating record, furnished upon request to the TCEQ, and made available for inspection by TCEQ personnel, as necessary.

For on-site stockpiles, the BMPs discussed previously, such as silt fence, hay bales, or rock or organic berms, may be used at the site manager's discretion to control erosion and runoff around the stockpile areas. Details of these BMPs are shown on Figures III2-14 and III2-15.

#### **4.4.3 Placing and Removing Temporary BMPs**

The BMPs discussed in the previous sections will be placed in accordance with the specifications as included in Appendix III2D, Example BMP Specifications or in accordance with the manufacturers' guidelines for that particular material. Since these BMPs are only temporary, they will be removed at the site manager's discretion when the specific situation warrants that the control is no longer needed or if a different control is implemented. Examples of when a control will be removed or replaced are as follows:

- 60 percent cover has been established.
- The BMP has been destroyed or damaged beyond repair.
- The BMP is not functioning efficiently.
- The intermediate cover area will become part of the active disposal area again.
- The intermediate cover area will receive final cover and permanent erosion controls.
- The BMP becomes a hindrance to daily site operations.

At other times, if deemed necessary by the site manager, the control may be removed to aid in the daily ongoing waste fill and construction activities that may not specifically be itemized in the above list. The placement and removal of temporary BMPs should not hinder the site operations, but should be considered by the site manager as an effective tool to minimize future maintenance or repairs.

BMPs will be removed or replaced as part of the site's daily operations. Removed BMPs that have been destroyed or damaged will be disposed of at the working face of the facility. The site manager will determine a location to store reusable BMPs so they are easily accessible for future construction.

## **4.5 Erosion and Sedimentation Control for Final Cover Areas**

30 TAC §330.305(e)

### **4.5.1 Erosion and Sedimentation Control Design – Final Cover Areas**

The final cover stormwater system design includes crownslope add-on berms along the 5 percent final cover top slopes and sideslope add-on berms spaced at 40-foot vertical intervals along the 4H:1V final cover slopes, or a maximum length of uninterrupted flow of 160 feet. The selection of stormwater management control structures will be a continual evolution of temporary and permanent control devices. The facility fill sequence plans included in Figures II-20, Operational Sequence Phases I – V will be used to properly select both temporary and permanent stormwater structural controls. The stormwater management structural controls were developed to provide low runoff velocities, to provide adequate storage and detention, and to limit sediment and soil loss impacts on stormwater discharge quality. Soil erosion loss and control was estimated using the Universal Soil Loss Equation in the USDA Handbook No. 703 – “Predicting Soil Erosion By Water: A Guide to Conservation Planning with the Revised Universal Soil Loss Equation (RUSLE),” 1997.

The design results in a maximum estimated soil loss of 2.1 tons/acre/year for the 4H:1V sideslopes of the landfill final cover. This estimate is equal to approximately 0.01 inches per year eroded from the final cover for this worst-case scenario. Soil loss calculations are presented in Appendix III2E, Final Cover Erosion Soil Loss Calculation.

### **4.5.2 Erosion and Sedimentation Control BMPs – Final Cover Areas**

Permanent stormwater management controls include seeding, add-on berms, downchute channels, slope contours, perimeter berms, final cap design, detention ponds, and discharge control structures.

To stabilize the final cover soil, a 6-inch thick top soil layer that is capable of supporting native vegetation growth will be installed on the final cover surfaces. Maintenance and inspection, as addressed in §5.0 Inspection, Maintenance, and Restoration Plan of this report, will be implemented to ensure a minimum 90 percent ground cover on the final cover and to ensure that the diversion structures, including the detention ponds, function as designed.

#### **4.6 Minimizing Off-site Vehicular Tracking of Sediments**

To minimize the off-site vehicular tracking of sediments onto public roadways, traffic routing and site operation practices will be developed. The following preventative measures will be utilized to control sediment tracking:

- Maintain the site entrance to minimize the accumulation of excessive mud, dirt, dust, and rocks.
- Schedule maintenance and construction of paved and temporary roads to limit disruption of traffic flow patterns or create vehicular safety problems.
- Control traffic routing during wet weather conditions to limit the impact of sediment tracking.

#### **5.0 INSPECTION, MAINTENANCE, AND RESTORATION PLAN**

30 TAC §330.305(e)(1)

In addition to the design and operational considerations previously described in the §4.0 Erosion and Sedimentation Control Plan of this report, it is necessary to inspect and maintain the stormwater management system and erosion control measures to maintain the required effectiveness of the system components. The City will maintain the stormwater management system as designed and will restore and repair the drainage system in the event of washout or failure in accordance to Part IV, Site Operating Plan §4.22.6 Erosion of Cover. The inspection, maintenance, and repair guidelines as discussed in the following sections will be implemented into the employee training program as outlined in Part IV, Site Operating Plan §4.1 Personnel Training. Documentation of the inspections and repairs, as outlined below, will be denoted in the Cover Application Log and will be maintained as part of the site operating record, in accordance with the Part IV, Site Operating Plan §4.22.7 Cover Inspection Record.

#### **5.1 Stormwater Management System**

The site will be monitored to ensure the integrity and adequate operation of the stormwater collection, drainage, and storage facilities. On a weekly basis, all temporary and permanent drainage facilities will be inspected. Following a significant rainfall event (greater than 0.5 inches within 24 hours), all temporary and permanent drainage facilities will be inspected within 48 hours after the rain event, as ground conditions allow. In the event of a washout or failure, the drainage system will be restored and repaired. Plans and actions will be developed to address and remediate the problem to ensure protection to ground and surface waters. Sediment and debris will be removed from channels, ponds, and from around outfall structures, as needed, to maintain the effectiveness of the stormwater management system. Minor maintenance requirements, such as removing excessive sediment and vegetation, will be undertaken as required. Upon completion of sediment removal from lined stormwater ponds, the ponds' HDPE liner will be inspected for damage and, if necessary, repaired in accordance with Part III3F, Liner Quality Control Plan.

## 5.2 Landfill Cover Materials

Landfill cover soils are inspected on a regular basis. Daily cover soils are inspected and applied in accordance with the Part IV, Site Operating Plan §4.22.1 Daily Cover. During the active life of the site, inspections of intermediate and final cover also will be performed within 48 hours after a significant rain event (greater than 0.5 inches within 24 hours) in which runoff occurs, as ground conditions allow. During the post-closure maintenance period of the site, the final cover will be inspected quarterly. The inspections will include any temporary or permanent erosion measures that are in place at the time of the inspection. Reports of these inspections will be documented in the Cover Application Log and will be maintained as part of the site operating record, in accordance with Part IV, Site Operating Plan §4.22.7 Cover Inspection Record.

Erosion gullies or washed-out areas deep enough to jeopardize the intermediate or final cover must be repaired within 5 days of detection. An eroded area is considered to be deep enough to jeopardize the intermediate or final cover if it exceeds 4 inches in depth, as measured from the vertical plane from the erosion feature and the 90-degree intersection of this plane with the horizontal slope face or surface. Damage to any temporary or permanent erosion measures noted during the inspections will be repaired or replaced within 14 days of detection. The repair schedule, as outlined for the cover or the erosion measures, may be extended due to inclement weather conditions or the severity of the condition requiring an extended repair schedule. The TCEQ's regional office in Harlingen will be notified to coordinate a revised schedule in case an extended repair schedule is required.

## 6.0 FLOODPLAIN EVALUATION

Consistent with 30 TAC §§330.61(m)(1), 330.63(c)(2), 330.307, and 330.547, an evaluation of the 100-year floodplain has been prepared and discussed in Part II §2.8, Floodplains and Part IIC, Floodplains.

### 6.1 100-year Floodplain Location

30 TAC §330.63(c)(2)(A)

As discussed in Part II §2.8.1, Location the permit boundary for the facility extends into two small unnamed ponding areas designated Special Flood Hazard Area (SFHA) Flood Zone A as shown in Figure IIC-3, FEMA Q3 Flood Data. Note that these two SFHA areas are both localized small depressions and are not connected with any floodways. Future construction of the facility perimeter berm fill in the areas are required prior to any waste acceptance in the associated areas. As a result, the waste footprint will be outside the 100-year floodplain.

## **6.2 Data Source for Floodplain Determination**

30 TAC §330.63(c)(2)(B)

As discussed in Part II §2.8.2, Data Source, the facility's property boundary is located on the Flood Insurance Rate Map (FIRM) panel number 480334 0325D dated June 6, 2000, which was revised by LOMR 01-06-1095P dated May 17, 2001. The SFHA changes made by subsequent Letter of Map Changes (LMOCs) have not yet been incorporated into FEMA's National Flood Insurance Program (NFIP) National Flood Hazard Layer (NFHL) digital database and does not yet contain high resolution flood hazard mapping data for Hidalgo County. The most current SFHA delineations available for the project area are FEMA Quality Level 3 (Q3) Flood Data files as verified by FEMA.

## **6.3 Flood Protection of the Facility**

30 TAC §330.63(c)(2)(C)

As demonstrated in Part IIC2-1, FEMA CLOMR-F Request, construction of the facility perimeter berm and storm water management structures—placement of fill in the SFHA Zone A areas—will not restrict the flow of the 100-year flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste so as to pose a hazard to human health and the environment. The facility perimeter berm encompassing the entire waste footprint will provide a minimum of three feet of freeboard above the 100-year design flood.

## **6.4 Construction Approval**

A request for Conditional Letter of Map Revision Based on the Placement of Fill (CLOMR-F) was submitted to FEMA included in Part IIC2-2, FEMA CLOMR-F Request. The submittal included a detailed discussion of proposed fill in the two SHFA Zone A areas, figures detailing facility design plan and profiles, and required documentation. FEMA responded that the proposed development does not encroach on a FEMA designated floodway and no buildings are anticipated to be constructed on the site, there are no procedures under the NFIP regulations that require action by FEMA. Hidalgo County, or other agencies having jurisdiction of the site, may have requirements that apply.

The City of Edinburg has jurisdiction over the facility and adjacent properties. The Director of Public Works reviewed and approved the request for CLOMR-F and signed the Community Acknowledgement Form included in Appendix IIC2-3, Community Floodplain Management Review and Approval.

## **7.0 ALTERNATIVE SYNTHETIC GRASS FINAL COVER DRAINAGE DESIGN**

The alternative synthetic grass final cover presented in Part III7, Closure Plan will consist of the following from top to bottom:

- HDPE synthetic grass
- Sand infill
- Woven geotextile filter backing
- 50-mil linear low density polyethylene (LLDPE) Super Gripnet® geomembrane with integrated drainage layer

A major consideration of the synthetic grass cover on the drainage system is that the surface runoff coefficient (CN) number is higher; a CN number of 98 for the entire final cover area was used for the analysis. Appendix III2F, Synthetic Grass Cover Drainage Calculation shows that the perimeter channels and the stormwater ponds have adequate capacity using analysis methods consistent with those discussed in Appendix III2A, Detailed Drainage Calculation.

**FIGURES**



**LEGEND**

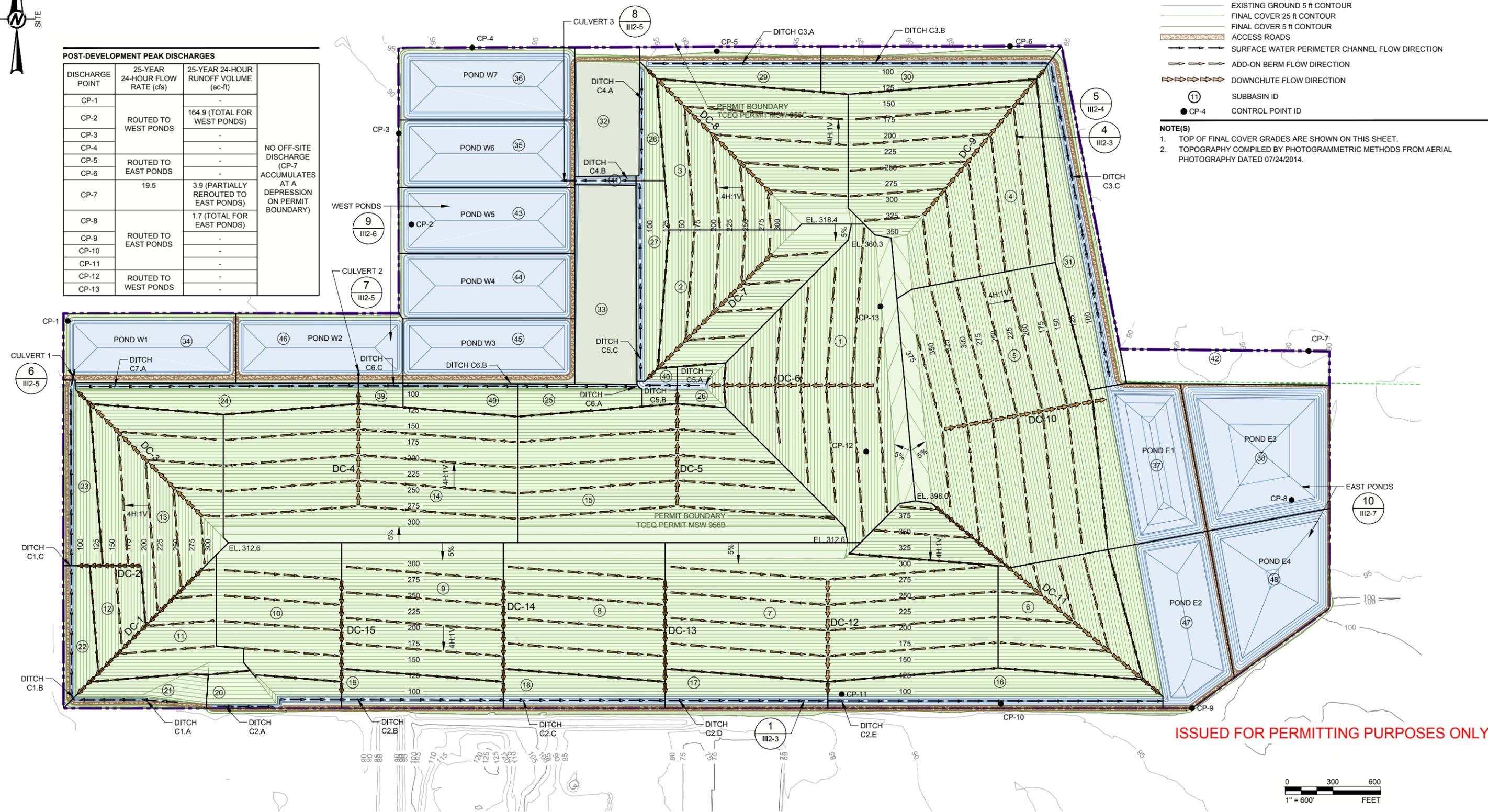
- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERM FLOW DIRECTION
- DOWNCHUTE FLOW DIRECTION
- 11 SUBBASIN ID
- CP-4 CONTROL POINT ID

**NOTE(S)**

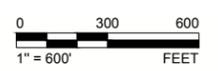
- TOP OF FINAL COVER GRADES ARE SHOWN ON THIS SHEET.
- TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.

**POST-DEVELOPMENT PEAK DISCHARGES**

DISCHARGE POINT	25-YEAR 24-HOUR FLOW RATE (cfs)	25-YEAR 24-HOUR RUNOFF VOLUME (ac-ft)	
CP-1	-	-	NO OFF-SITE DISCHARGE (CP-7 ACCUMULATES AT A DEPRESSION ON PERMIT BOUNDARY)
CP-2	ROUTED TO WEST PONDS	164.9 (TOTAL FOR WEST PONDS)	
CP-3			
CP-4			
CP-5	ROUTED TO EAST PONDS	-	
CP-6			
CP-7	19.5	3.9 (PARTIALLY REROUTED TO EAST PONDS)	
CP-8	ROUTED TO EAST PONDS	1.7 (TOTAL FOR EAST PONDS)	
CP-9			
CP-10			
CP-11	-	-	
CP-12	-	-	
CP-13	-	-	



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GOLDER ASSOCIATES

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HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
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PROJECT

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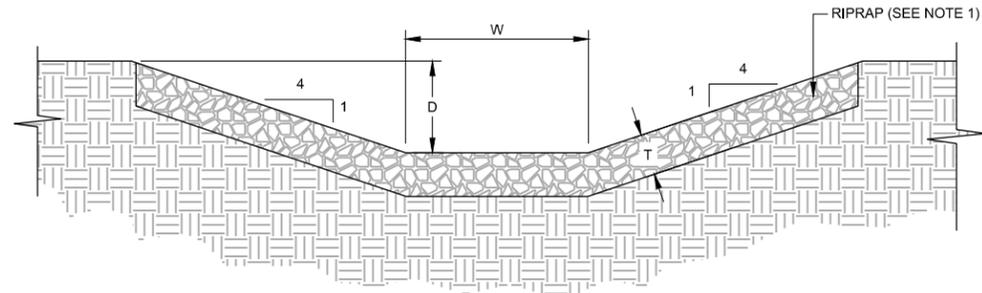
**POST-DEVELOPMENT DRAINAGE PLAN**

PROJECT NO.	APPLICATION SECTION	REV.	2 of 15	FIGURE
1401491	III2	1		III2-2

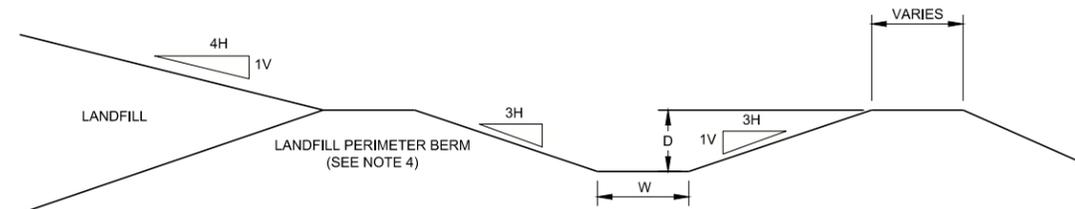
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

**NOTES**

1. A GEOTEXTILE FILTER FABRIC SHALL BE INSTALLED PRIOR TO PLACEMENT OF RIPRAP. RECYCLED CRUSHED CONCRETE MAY BE USED AS RIPRAP PROVIDED THAT IT MEETS THE GRADATION REQUIREMENTS AND DOES NOT CONTAIN REINFORCING STEEL. RIPRAP  $D_{50} = 15"$ , MIN. THICKNESS = 2.5 ft.
2. FINAL COVER DETAILS ARE LOCATED IN PART III7, CLOSURE PLAN.
3. THE DEPTH (D) AND WIDTH (W) OF THE PERIMETER DRAINAGE DITCHES AND CHANNELS VARIES AS SHOWN ON THE SCHEDULE BELOW.
4. THE LANDFILL PERIMETER BERM WILL BE CONSTRUCTED OF COMPACTED ON-SITE SOILS.



SCALE NTS 1 III2-3 RIP-RAP LINED PERIMETER CHANNEL

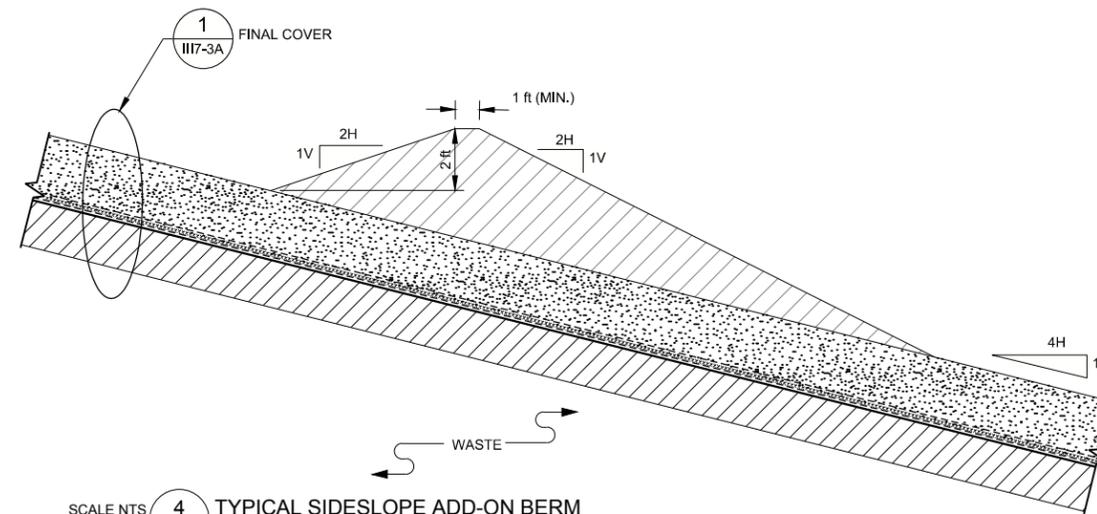


SCALE NTS 2 III2-3 PERIMETER DRAINAGE DITCH DETAIL

**PERIMETER DRAINAGE DITCHES AND CHANNELS SCHEDULE**

DITCH DESIGNATION	DITCH SLOPE (FT/FT)	CHANNEL WIDTH W (FT)	CHANNEL DEPTH D (FT)	CHANNEL SIDESLOPES H:1 (FT)	FLOWLINE ELEV. (FT-MSL) UPSTREAM	FLOWLINE ELEV. (FT-MSL) DOWNSTREAM	WSE* (FT-MSL) UPSTREAM	WSE* (FT-MSL) DOWNSTREAM	MAX* VELOCITY (FT/SEC)	CHANNEL LINING	LENGTH OF CHANNEL (FT)
DITCH C1.A	0.001	8	2.4	3:1	89.6	89.0	90.9	90.3	1.3	GRASS	610
DITCH C1.B	0.001	8	3.3	3:1	89.0	88.2	91.3	90.5	1.8	GRASS	842
DITCH C1.C	0.001	8	4.0	3:1	88.2	87.0	91.1	89.9	2.0	GRASS	1157
DITCH C2.A	0.001	9	2.4	3:1	92.5	91.7	93.8	93.0	1.3	GRASS	855
DITCH C2.B	0.001	20	3.4	3:1	91.7	90.7	94.0	93.0	2.0	GRASS	1015
DITCH C2.C	0.001	20	4.4	3:1	90.7	89.6	94.0	93.0	2.4	GRASS	1015
DITCH C2.D	0.001	17.5	5.3	3:1	89.6	88.6	93.9	92.9	2.7	GRASS	1020
DITCH C2.E	0.001	15	6.4	3:1	88.6	86.4	94.2	92.0	3.1	GRASS	2167
DITCH C3.A	0.001	15	4.0	3:1	91.0	89.9	93.8	92.7	2.1	GRASS	1117
DITCH C3.B	0.001	11	5.1	3:1	89.9	88.5	93.8	92.4	2.5	GRASS	1425
DITCH C3.C	0.001	15	5.6	3:1	88.5	86.3	93.2	91.1	2.8	GRASS	2120
DITCH C4.A	0.001	0	3.1	3:1	88.8	88.1	90.7	90.0	1.2	GRASS	678
DITCH C4.B	0.003	30	3.9	3:1	88.1	87.0	91.4	90.3	4.3	GRASS	376
DITCH C5.A	0.0015	20	4.3	3:1	90.6	90.4	93.3	93.1	2.7	GRASS	172
DITCH C5.B	0.0015	20	4.7	3:1	90.4	90.0	94.3	93.9	3.2	GRASS	247
DITCH C5.C	0.0015	20	5.0	3:1	90.0	88.1	94.5	92.5	3.5	GRASS	1291
DITCH C6.A	0.001	0	3.4	3:1	89.7	89.0	91.8	91.1	1.4	GRASS	722
DITCH C6.B	0.001	0	4.0	3:1	89.0	88.2	91.6	90.9	1.6	GRASS	720
DITCH C6.C	0.001	0	4.1	3:1	88.2	88.0	91.0	90.7	1.6	GRASS	280
DITCH C7.A	0.001	0	4.1	3:1	87.7	86.0	90.4	88.6	1.6	GRASS	1771

\* VALUES BASED ON 25-YEAR, 24-HOUR STORM EVENT.  
 \*\*SEE FIGURES III2-III2-3 AND III2-III2-4 FOR RIPRAP DESIGN IN AREAS OF PERIMETER CHANNELS DIRECTLY BELOW THE DOWNCHUTES.



SCALE NTS 4 III2-3 TYPICAL SIDESLOPE ADD-ON BERM

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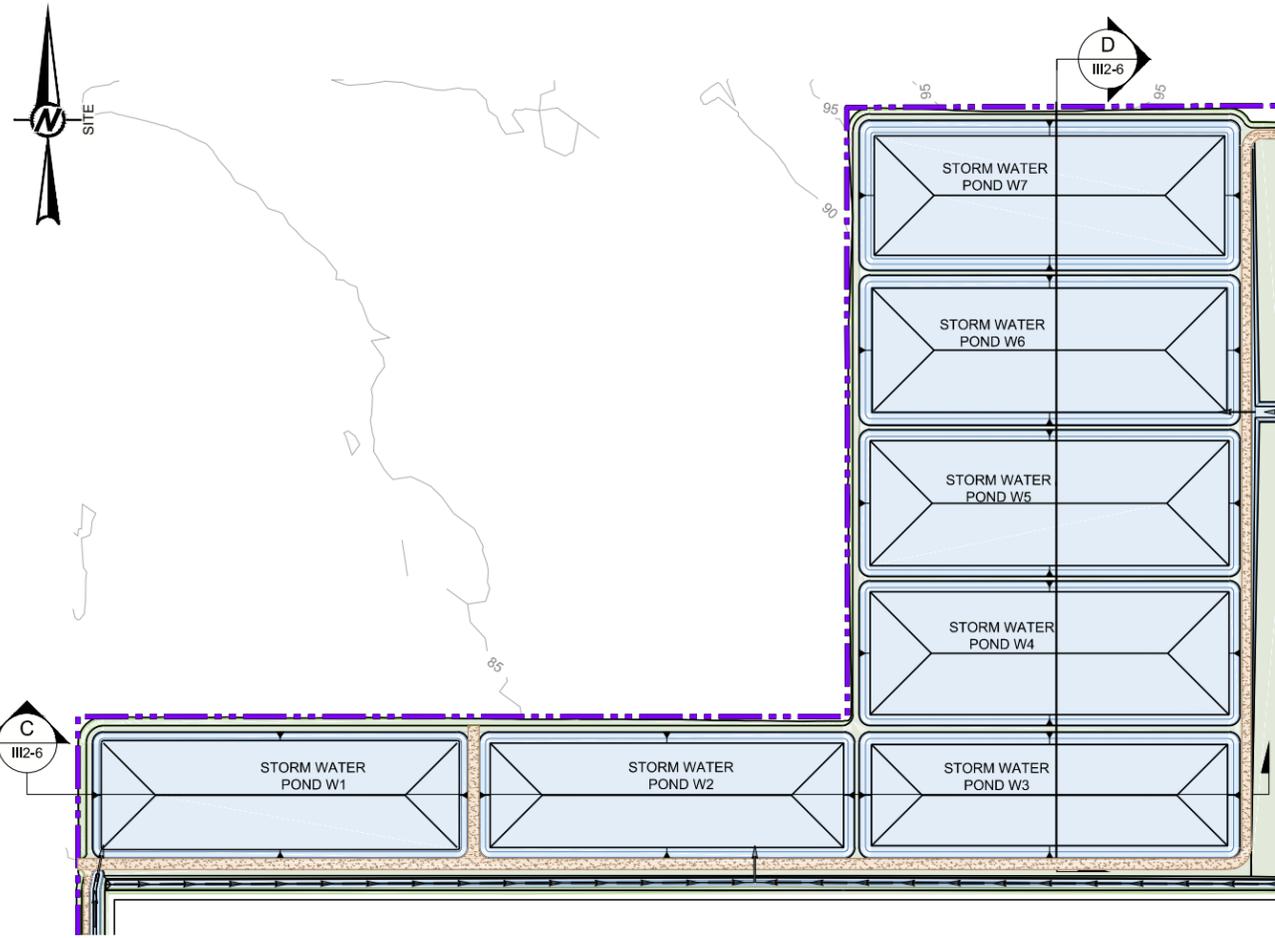
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TITLE

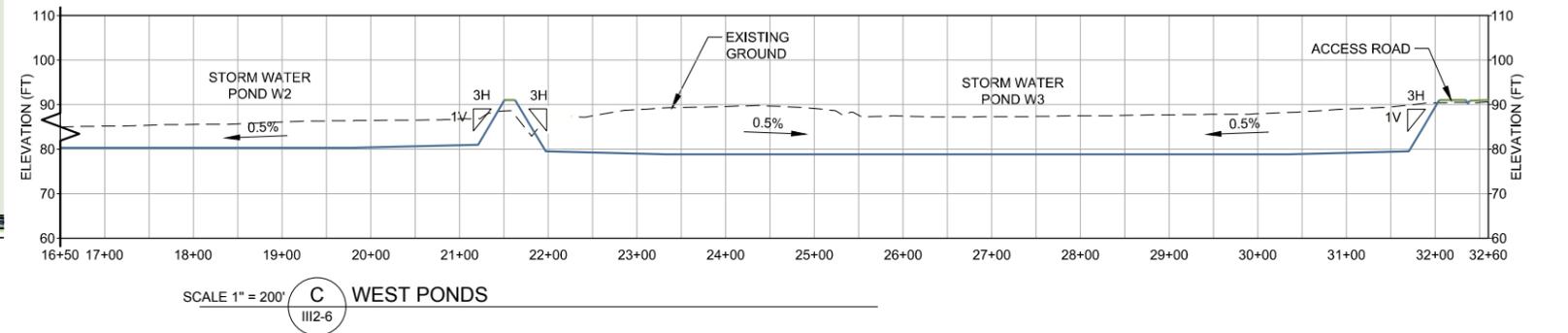
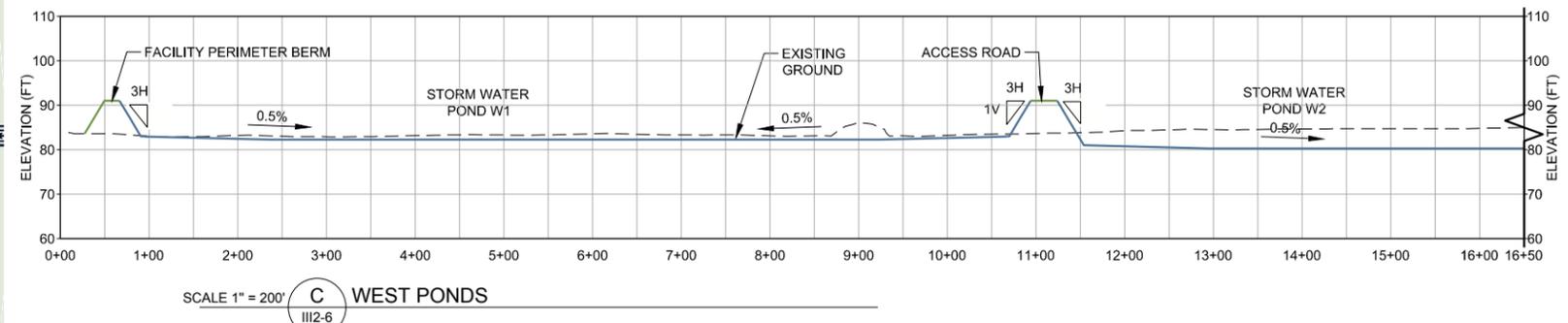
**DRAINAGE CONTROL DETAILS I - CHANNELS AND BERMS**

PROJECT NO. 1401491      APPLICATION SECTION III2      REV. 1      3 of 15      FIGURE III2-3

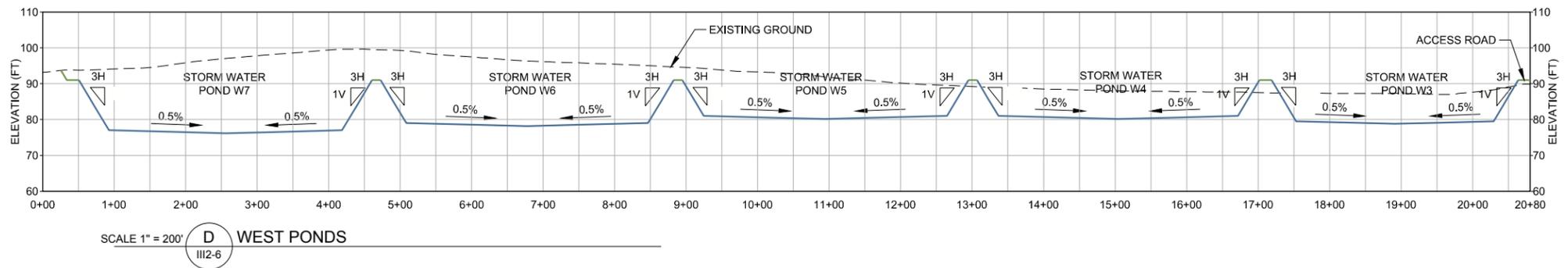
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- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - PERIMETER BERM 25 ft CONTOUR
  - PERIMETER BERM 5 ft CONTOUR
  - STORMWATER POND 25 ft CONTOUR
  - STORMWATER POND 5 ft CONTOUR
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - ACCESS ROADS



SCALE 1" = 500' **9 WEST PONDS**  
III2-6



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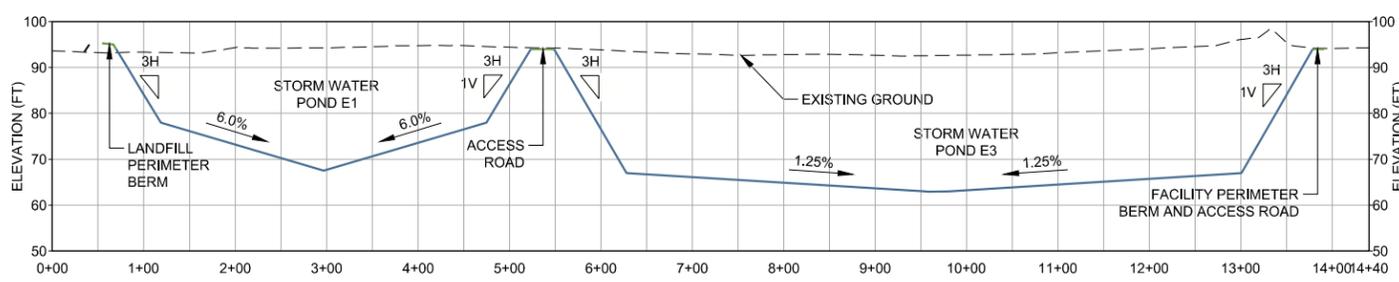
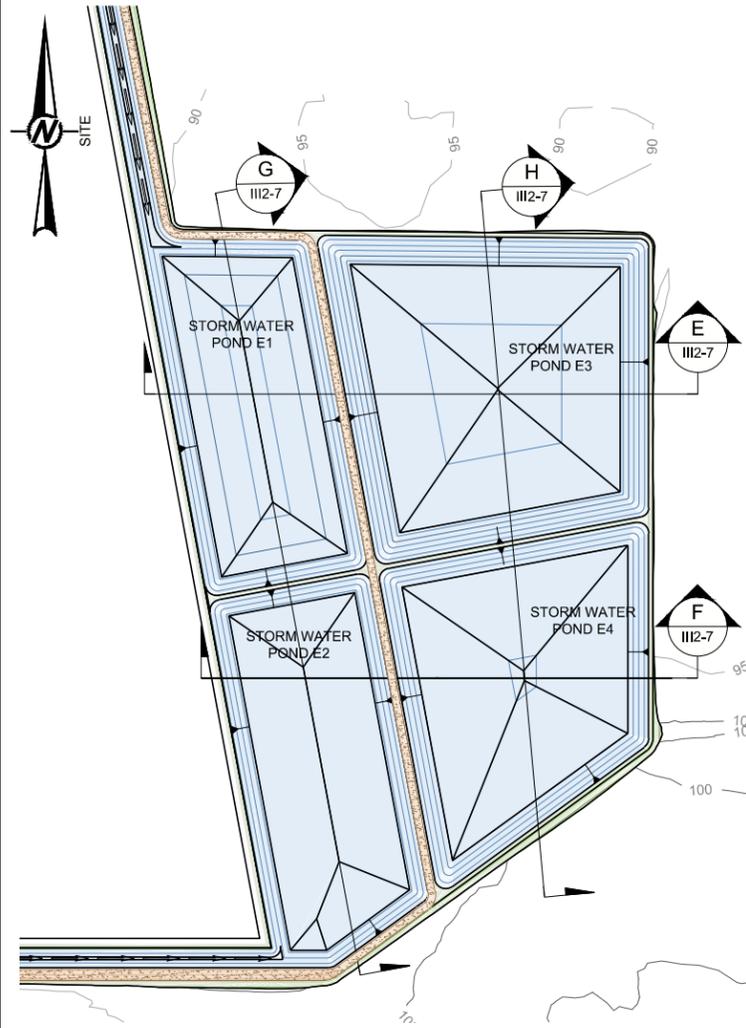
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EDINBURG, HIDALGO COUNTY, TEXAS

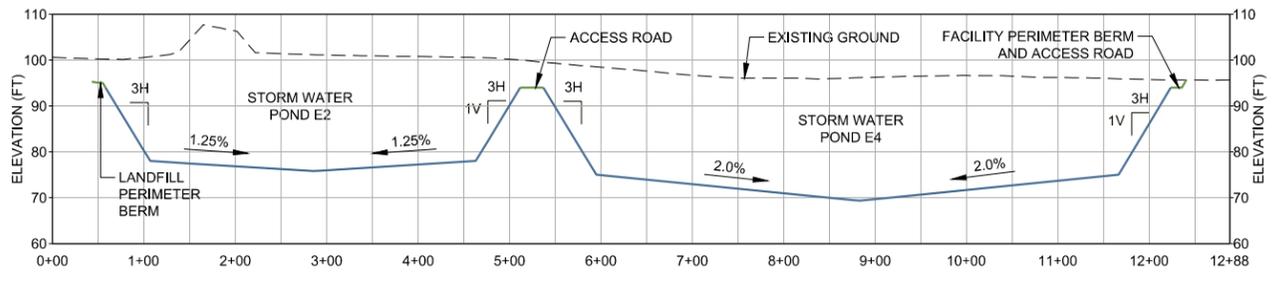
TITLE  
**DRAINAGE CONTROL DETAILS IV - WEST PONDS AND SECTIONS**

PROJECT NO. 1401491    APPLICATION SECTION III2    REV. 1    6 of 15    FIGURE III2-6

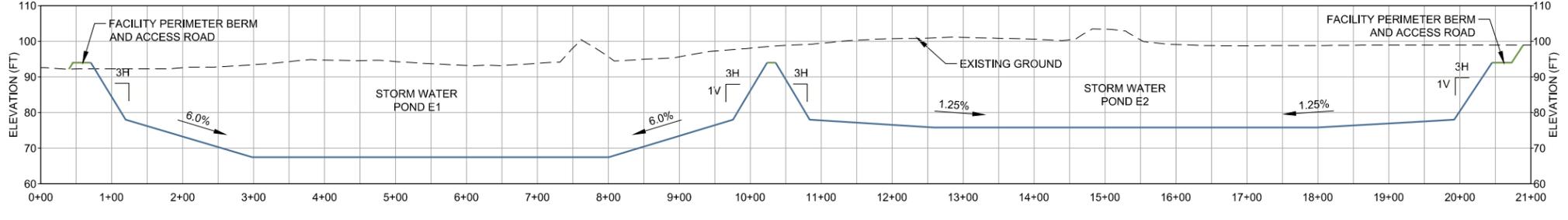
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



SCALE 1" = 200' **E EAST PONDS**  
III2-7

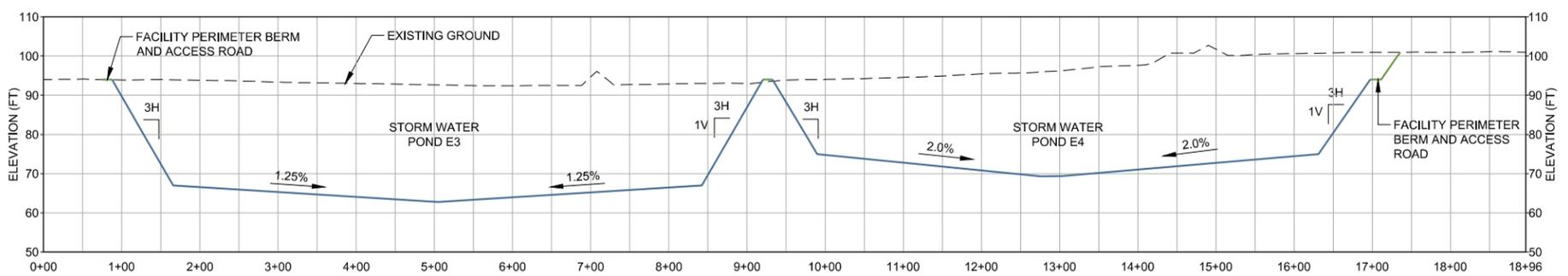


SCALE 1" = 200' **F EAST PONDS**  
III2-7



SCALE 1" = 200' **G EAST PONDS**  
III2-7

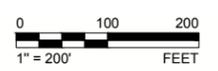
SCALE 1" = 500' **10 EAST PONDS**  
III2-7



SCALE 1" = 200' **H EAST PONDS**  
III2-7

- LEGEND**
- PERMIT BOUNDARY
  - - - EXISTING GROUND 25 ft CONTOUR
  - - - EXISTING GROUND 5 ft CONTOUR
  - PERIMETER BERM 25 ft CONTOUR
  - PERIMETER BERM 5 ft CONTOUR
  - STORMWATER POND 25 ft CONTOUR
  - STORMWATER POND 5 ft CONTOUR
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - ACCESS ROADS

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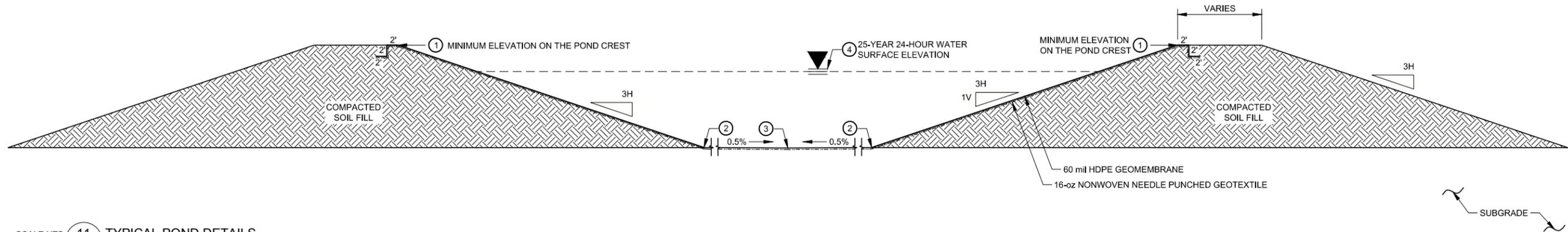
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**DRAINAGE CONTROL DETAILS V - EAST PONDS AND SECTIONS**

PROJECT NO. 1401491      APPLICATION SECTION III2      REV. 1      7 of 15      FIGURE III2-7

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



SCALE NTS **11** TYPICAL POND DETAILS  
III2-8

WEST POND ELEVATION

NUMBER	W1	W2	W3	W4	W5	W6	W7
1	91.0	91.0	91.0	91.0	91.0	91.0	91.0
2	83.0	81.0	79.5	81.0	81.0	79.0	77.0
3	82.3	80.3	78.8	80.2	80.2	78.2	76.2
4*	85.1	85.1	85.1	84.3	84.3	84.2	78.5

\*25-YEAR 24-HOUR WATER SURFACE ELEVATION BASED THE POND BEING EMPTY.

EAST POND ELEVATION

NUMBER	E1	E2	E3	E4
1	94.0	94.0	94.0	94.0
2	78.0	67.0	78.0	75.0
3	67.5	63.0	75.8	69.3
4	77.4	77.4	77.4	77.4

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HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
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**DRAINAGE CONTROL DETAILS VI - POND DETAILS**

PROJECT NO.  
1401491

APPLICATION SECTION  
III2

REV. 1  
8 of 15

FIGURE  
III2-8

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

**APPENDIX III2A**  
**DETAILED DRAINAGE CALCULATION**

## DETAIL DRAINAGE CALCULATION

Made By: VJE  
Checked by: MX  
Reviewed by: CGD

### 1.0 OBJECTIVE

Develop a surface water management plan for the proposed development at the Edinburg Regional Disposal Facility (RDF) located in Hidalgo County, Texas. Compare pre- and post-development peak flows, volumes, and velocities for the 25-year, 24-hour storm event.

### 2.0 METHOD

The proposed Edinburg Regional Disposal Facility expansion site is greater than 200 acres. Therefore, Golder utilizes the USACE HEC-HMS modeling software for the drainage analysis. Subbasins were delineated for pre- and post-development conditions using existing topography and proposed final cover topography respectively (see Figures III2A-1 and III2A-2). The pre-development conditions consist of the permitted final grades and drainage design in the currently permitted area and existing topography in the expansion area. The post-development conditions consist of the proposed final grades and drainage design.



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Composite SCS curve numbers (CN) were estimated for each subbasin (USSCS, 1986). The SCS method was used to estimate a time of concentration ( $T_c$ ) for each subbasin; lag times (required for HEC-HMS input) were calculated as  $0.6 * T_c$ . Subbasin areas, curve numbers, and lag times were entered into HEC-HMS to estimate peak flows and runoff volumes.

Peak flows from the HEC-HMS hydrology model were used to design stormwater channels required for the surface water management plan (downchutes, perimeter channels, add-on berms, and perimeter drainage ditches). Channel calculations were performed using a spreadsheet that solves Manning's equation for normal depth. Culvert sizing calculations were carried out using HY8 software (FHWA, 1996).

Stage-storage relationships for all ponds were developed using site contours and spreadsheet calculations.

### 3.0 ASSUMPTIONS

- 24-hour rainfall depths (TR-55, 1986):
  - o 2-year = 4.3 in (used in time of concentration calculations)
  - o 25-year = 8.5 in
  - o 100-year = 11.0 in (used in time of concentration calculations)
- 24-hour rainfall events have an SCS Type III synthetic temporal distribution (TR-55, 1986).
- Curve numbers (consistent with previous work and local regulations/practice):
  - o Landfill final cover and other open areas, CN = 85
  - o Paved areas, CN = 98
  - o Areas where minimum infiltration are expected (ponds), CN = 98
  - o Expansion area currently grassed or used for agricultural purposes, CN = 79
- Manning's roughness coefficients:
  - o Grass-lined channels,  $n = 0.035$
  - o Riprap channels,  $n=0.040$
- Landfill downchutes are armored with flexible Geomembrane.
  - o Geomembrane lined channels,  $n = 0.012$
- Landfill downchutes are sized to convey runoff from the 25-year, 24-hour storm event and allowing 0.5 feet of freeboard.
- Add-on berms have 2H:1V and 2H:1V side slopes and form triangular channels at 2 percent longitudinal slopes on the final cover slope.
- Add-on berms are sized to convey runoff from the 25-year, 24-hour storm event and provide a minimum of 0.5 feet of freeboard.
- Perimeter channels are trapezoidal with 3H:1V side slopes and varying bottom widths and longitudinal slopes. Minimum longitudinal slope is 0.1%.
- Perimeter channels are sized to convey runoff from the 25-year, 24-hour storm event and provide a minimum of 1.0 feet of freeboard.
- Perimeter channels are armored with riprap where flow velocities exceed 5 ft/s, as applicable.

### 4.0 CALCULATIONS

Tables 1A.1, 1A.2, 1B.1, and 1B.2 contain composite curve number and time of concentration calculations for the pre- and post-development conditions. The stage-storage relationships were developed in the spreadsheets shown in Tables 2A through 2D (proposed pond E1, E2, E3, E4, W1, W2, W3, W4, W5, W6, and W7). Table 3 contains calculations for the design of downchutes, add-on berm channels, and perimeter channels. Table 4 contains calculations of the run-off velocities at the control points for pre-development and post-development conditions. Table 5 includes time of concentration and manning's flow coefficients.

Attachment A contains HEC-HMS model input and output information including basin parameters, a routing diagram, and peak flows. HY8 reports summarizing the culvert sizing calculations are included as Attachment B. See Figures III2-A-1 and III2-A-2 for subbasin delineations and channel alignments.

## 5.0 CONCLUSIONS/RESULTS

The post-development downchutes, add-on berms and perimeter channels are designed to accommodate runoff from the 25-year, 24-hour storm event with 0.5' freeboard (design shown in Table 3). Riprap sizing and gradations are found in Appendix III2-A-3.

The post-development ponds (design shown in Tables 2A through 2D) are sufficiently sized to store the runoff from the 25-year, 24-hour storm event. The maximum water surface elevations in the ponds during the 25-year, 24-hour storm event are summarized below. The water surface elevation is below the pond crest in all ponds.

POND	Runoff Volume (ac-ft)	Maximum Pond Water El. (ft-msl)	Minimum Elev.of the Pond Levee (ft-msl)
	25-year 24-hour storm	25-year 24-hour storm	
W1	31.8	85.1	91.0
W2	34.6	85.1	91.0
W3	6.9	85.1	91.0
W4	7.1	84.3	91.0
W5	7.2	84.3	91.0
W6	70.8	84.3	91.0
W7	7.9	78.5	91.0
E1	80.2	77.4	94.0
E2	86.1	77.4	94.0
E3	11.5	77.4	94.0
E4	8.7	77.4	94.0

The culvert design for the post-development condition is summarized in the table below:

Culvert ID	25-year, 24-hour Design Storm	
	Flow Rate (cfs)	Culvert Design (number of barrels)
C1	209.0	3 - 6' x 3' conc. box
C2	238.8	6 - 4' x 2' conc. box
C3	555.5	6 - 6' x 3' conc. box

Note: See Figure III2-A-2 for locations of the proposed culvert. Alternative designs may be utilized if they provide adequate flow capacity.

The flow rates and volumes at the control points for both the pre-development and post-development conditions are summarized below.

Run-off Control Point	Flow Rates Pre-Development 25-year, 24-hour (cfs)	Flow Rates Post-Development 25-year, 24-hour (cfs)	Volumes Pre-Development 25-year, 24-hour (cfs)	Volumes Post-Development 25-year, 24-hour (cfs)
CP1	47.5	0	9.8	0
CP2	548.8	0	115.2	164.9 (west ponds)
CP3	32.5	0	4.1	0
CP4	21.0	0	2.9	0
CP5	226.4	0	29.8	0
CP6	250.6	0	42.1	0.0
CP7	51.1	19.5	9.8	3.9
CP8	55.6	0	9.6	187.7 (east ponds)
CP9	19.6	0	4.1	0
CP10	117.6	0	19.9	0
CP11	324.0	0	41.0	0
CP12	89.3	0	10.2	0
CP13	117.9	0	17.4	0

## 6.0 REFERENCE

1. Texas State Department of Highways and Public Transportation. December 1985. *Bridge Division Hydraulic Manual*, 3rd Edition.
2. TR-55. June 1986. *Urban Hydrology for Small Watersheds*. Washington D.C.: Department of Agriculture for Natural Resources Conservation Service, Conservation Engineering Division.
3. U.S. Federal Highway Administration (FHWA). 1996. *HY8 - Culverts Version 7.3 FHWA Culvert Analysis*. Washington, D.C.: FHA Office of Technology Applications [software package].
4. U. S. Soil Conservation Service (USSCS). 1986. *Urban hydrology for small watersheds, 2nd edition*. (USSCS Technical Release Number 55). Washington D.C.: United States Department of Agriculture.
5. US Army Corps of Engineers. 2003. *HEC-HMS Hydrologic Modeling System* [computer software] May 2003 Version 4.0.
6. US Army Corps of Engineers *EM 1110-2-1601 Hydraulic Design of Flood Control Channels*. July 1991.

**APPENDIX III2A**

**TABLES**

**TABLE 2D: POND E1, E2, E3, & E4 STAGE-STORAGE VOLUME (25-YEAR STORM)**

In order to calculate the total storage of the hydrologic reservoir routing, it is necessary to construct a storage-indication curve. Construct an Elevation-Storage (E-S) curve using the working design drawing and the following formula:

$$S = \Delta h \frac{A_1 + A_2 + (A_1 A_2)^{0.5}}{3}$$

where:

- S = pond volume (ft<sup>3</sup>)
- Δh = height of volume element (ft)
- A<sub>1</sub> = surface area of bottom of volume element (ft<sup>2</sup>)
- A<sub>2</sub> = surface area of top of volume element (ft<sup>2</sup>)

Pond E1						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
67.5	0	0.00	0	0	0	0
68.0	8,659	0.20	1,443	0.03	1,443	0.03
70.0	78,903	1.81	75,801	1.74	77,244	1.77
72.0	98,120	2.25	176,675	4.06	253,918	5.83
74.0	156,310	3.59	252,182	5.79	506,101	11.62
76.0	223,473	5.13	377,788	8.67	883,889	20.29
78.0	299,609	6.88	521,225	11.97	1,405,114	32.26
80.0	314,258	7.21	613,809	14.09	2,018,923	46.35
82.0	329,183	7.56	643,383	14.77	2,662,306	61.12
84.0	344,382	7.91	673,507	15.46	3,335,813	76.58
86.0	359,856	8.26	704,181	16.17	4,039,994	92.75
88.0	375,574	8.62	735,374	16.88	4,775,368	109.63
90.0	391,576	8.99	767,095	17.61	5,542,463	127.24
92.0	407,871	9.36	799,392	18.35	6,341,856	145.59
94.0	424,438	9.74	832,254	19.11	7,174,110	164.69

Pond E2						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
75.8	0	0.00	0	0	0	0
76.0	17,140	0.39	1,074	0.02	1,074	0.02
78.0	314,858	7.23	270,306	6.21	271,381	6.23
80.0	329,877	7.57	644,678	14.80	916,058	21.03
82.0	345,155	7.92	674,975	15.50	1,591,033	36.52
84.0	360,391	8.27	705,491	16.20	2,296,525	52.72
86.0	376,486	8.64	736,818	16.91	3,033,343	69.64
88.0	392,591	9.01	769,021	17.65	3,802,364	87.29
90.0	408,909	9.39	801,445	18.40	4,603,809	105.69
92.0	425,505	9.77	834,359	19.15	5,438,167	124.84
94.0	442,359	10.16	867,809	19.92	6,305,976	144.76

Pond E3						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
62.8	0	0.00	0	0	0	0
64.0	36,899	0.85	14,760	0.34	14,760	0.34
66.0	263,730	6.05	266,184	6.11	280,944	6.45
68.0	462,503	10.62	716,990	16.46	997,934	22.91
70.0	478,420	10.98	940,878	21.60	1,938,812	44.51
72.0	494,599	11.35	972,974	22.34	2,911,786	66.85
74.0	511,041	11.73	1,005,595	23.09	3,917,381	89.93
76.0	527,745	12.12	1,038,741	23.85	4,956,122	113.78
78.0	544,712	12.50	1,072,413	24.62	6,028,535	138.40
80.0	561,942	12.90	1,106,610	25.40	7,135,145	163.80
82.0	579,435	13.30	1,141,332	26.20	8,276,477	190.00
84.0	597,190	13.71	1,176,580	27.01	9,453,057	217.01
86.0	615,208	14.12	1,212,353	27.83	10,665,410	244.84
88.0	633,488	14.54	1,248,651	28.66	11,914,061	273.51
90.0	652,031	14.97	1,285,475	29.51	13,199,535	303.02
92.0	670,837	15.40	1,322,823	30.37	14,522,359	333.39
94.0	689,909	15.84	1,360,702	31.24	14,560,237	334.26

Pond E4						
Elevation (ft MSL)	Area (ft <sup>2</sup> )	Area (acres)	Inc. Volume (ft <sup>3</sup> )	Inc. Volume (acre-ft)	Σ Volume (ft <sup>3</sup> )	Σ Volume (acre-ft)
69.3	0	0.00	0	0	0	0
70.0	6,724	0.15	1,461	0.03	1,461	0.03
72.0	84,064	1.93	76,374	1.75	77,836	1.79
74.0	247,310	5.68	317,040	7.28	394,876	9.07
76.0	368,657	8.46	611,943	14.05	1,006,819	23.11
78.0	383,892	8.81	752,498	17.27	1,759,318	40.39
80.0	399,413	9.17	783,254	17.98	2,542,572	58.37
82.0	415,220	9.53	814,582	18.70	3,357,154	77.07
84.0	431,313	9.90	846,482	19.43	4,203,636	96.50
86.0	447,691	10.28	878,953	20.18	5,082,589	116.68
88.0	464,356	10.66	911,996	20.94	5,994,585	137.62
90.0	481,306	11.05	945,611	21.71	6,940,196	159.32
92.0	498,542	11.44	979,798	22.49	7,919,994	181.82
94.0	516,080	11.85	1,014,572	23.29	8,934,567	205.11

Combined Stage Storage Volumes for Ponds E1, E2, & E4 (Interconnected by Equalizing Pipes)

Elevation (ft MSL)	Σ Volume (acre-ft)
62.8	0
68.0	22.94
70.0	46.32
72.0	74.46
74.0	110.61
76.0	157.21
78.0	217.27
80.0	289.55
82.0	364.71
84.0	442.81
86.0	523.90
88.0	608.04
90.0	695.27
92.0	785.63
94.0	848.82

Volume required per HEC-HMS model:

Pond Name	Volume (acre-ft)
E1	80.2
E2	86.1
E4	8.7
E3	11.5
Σ Volume	186.5

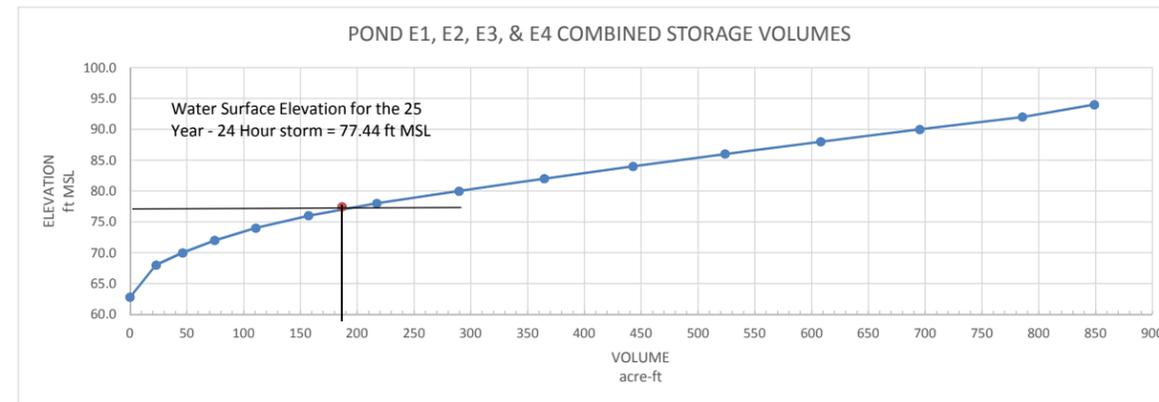
Next, the water surface elevation of the peak volume for the 25 year - 24 hour storm event. The peak volume is calculated using the HEC-HMS program. The water surface elevation is calculated by interpolation based on the stage storage table.

$$y_2 = \frac{(x_2 - x_1)(y_3 - y_1)}{(x_3 - x_1)} + y_1$$

y = elevations (ft MSL)  
x = volume (ac-ft)

25 year - 24 hour storm event  
Peak Volume = 186.50 ac-ft  
Water Surface Elevation = 77.44 ft MSL

- References:
- US Army Corps of Engineers. 2003. *HEC-HMS Hydrologic Modeling System* [computer software] May 2003 Version 4.0.



**APPENDIX III2A**

**FIGURES**



**LEGEND**

- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERMS FLOW DIRECTION
- WATER DOWNCHUTE FLOW DIRECTION
- 11 SUBBASIN ID
- CP-4 CONTROL POINT ID

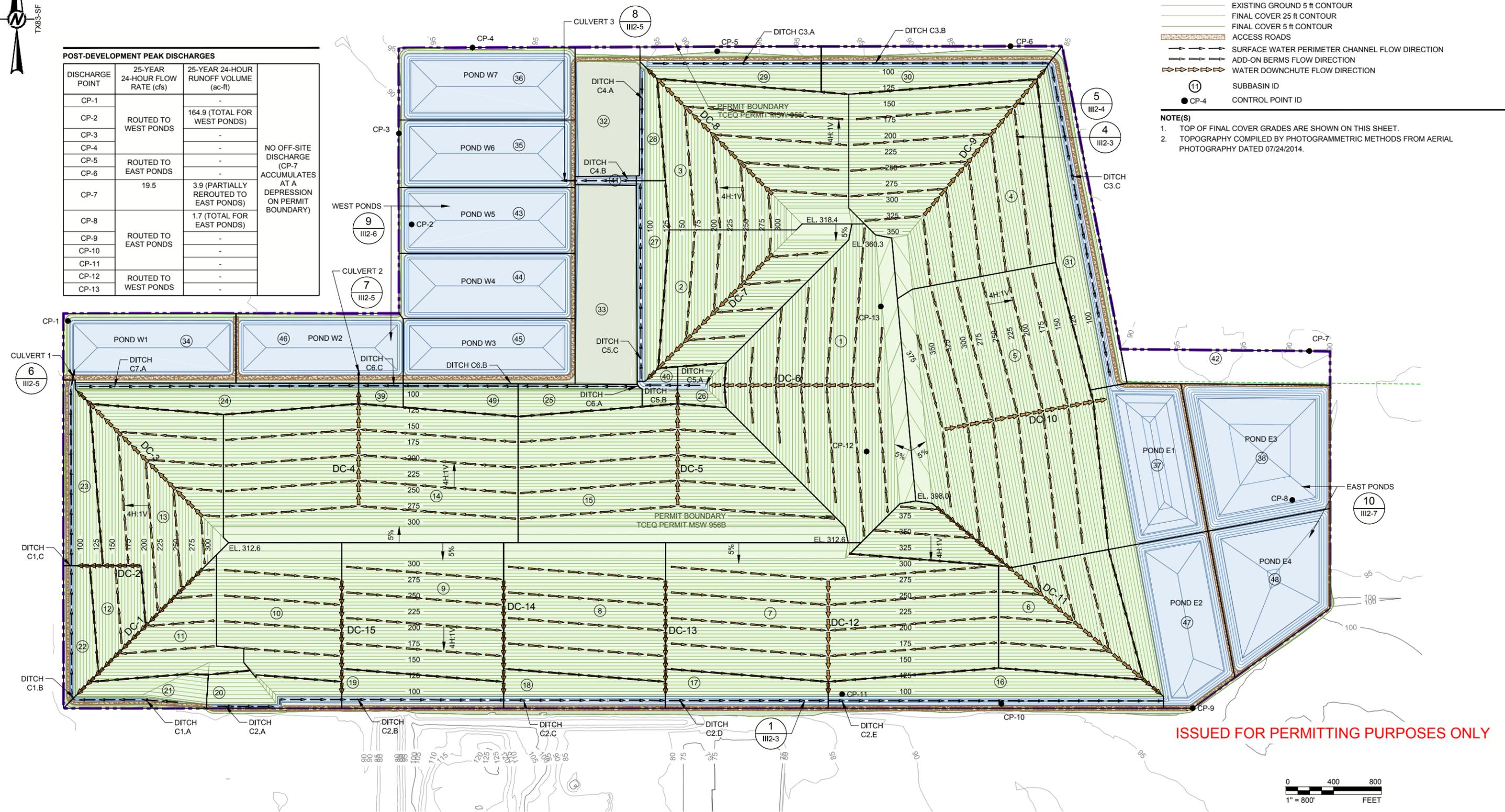
**NOTE(S)**

- TOP OF FINAL COVER GRADES ARE SHOWN ON THIS SHEET.
- TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.

**POST-DEVELOPMENT PEAK DISCHARGES**

DISCHARGE POINT	25-YEAR 24-HOUR FLOW RATE (cfs)	25-YEAR 24-HOUR RUNOFF VOLUME (ac-ft)
CP-1	-	-
CP-2	ROUTED TO WEST PONDS	164.9 (TOTAL FOR WEST PONDS)
CP-3		
CP-4		
CP-5	ROUTED TO EAST PONDS	-
CP-6		
CP-7	19.5	3.9 (PARTIALLY REROUTED TO EAST PONDS)
CP-8	ROUTED TO EAST PONDS	1.7 (TOTAL FOR EAST PONDS)
CP-9		
CP-10		
CP-11	-	-
CP-12	-	-
CP-13	-	-

NO OFF-SITE DISCHARGE (CP-7 ACCUMULATES AT A DEPRESSION ON PERMIT BOUNDARY)



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	MX	TNB	MX	CGD
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	TNB	VJE	MX	CGD

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**POST-DEVELOPMENT DRAINAGE PLAN**

PROJECT NO. 1401491      APPLICATION SECTION      REV. 1      2 of 2      FIGURE 1112A-2

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B.

**APPENDIX III2B**  
**ACTIVE FACE BERM SIZING**

## ACTIVE FACE BERM SIZING

Made By: VJE  
Checked by: MX  
Reviewed by: CGD

### 1.0 OBJECTIVE

Calculate the required size of the stormwater containment berm at the landfill active face as a function of plane area of the active area.

### 2.0 GIVEN

- Waste slope of 4H:1V
- 25 years, 24 hour storm event of 8.5 inches;
- Berm slope of 2H:1V;
- 1.0 ft. freeboard on berm

### 3.0 ASSUMPTIONS

- Stormwater run-on to the active face will not be allowed
- 50 percent run-off from the active face, i.e., 50% infiltration

### 4.0 CALCULATION

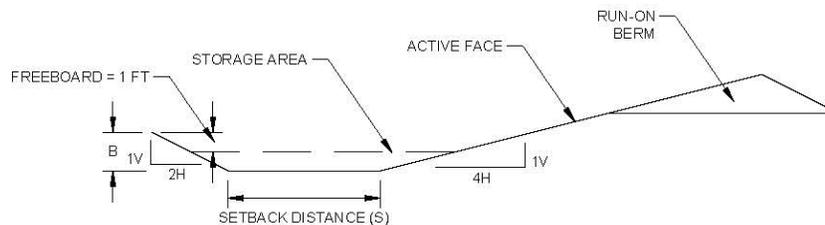
Derive relationships for the amount of runoff from the 8.5 inch design storm and the available storage volume as a function of the active face area.



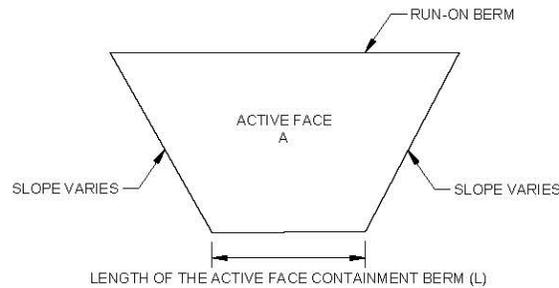
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### Cross-section of the Active Face and Containment Berm



## Elevation View of the Active Face and Containment Berm



### 4.1 Runoff, R

$$R = .5 \left( 8.5 \div 12 \text{ in/ft} \right) \times A = \frac{.71}{2} \times A = .35 \times A$$

Where:

R = total runoff into the active area containment berm (cf)

A = total area of the active face (sf)

### 4.2 Storage, V

$$V = L \times \left( \frac{S + (S + (B - 1) \times 2 \times (B - 1) \times 4)}{2} \right) \times (B - 1)$$

$$V = (3B^2 + (S - 6) \times B - S + 3) \times L$$

Where:

V = storage capacity an active face containment berm (cf)

L = length of the active face containment berm (ft)

### 4.3 Height of Berm, B

Now set runoff, R, equal to storage, V, and solve for the height of berm, B.

$$B = \frac{6 - S + \sqrt{S^2 + 4.2 \frac{A}{L}}}{6}$$

For typical site operations, the maximum berm height will be 6 ft. The operator can vary the berm length and setback distance to limit the berm height to 6 ft.

Now plot B versus L for various values of S and A. Figures 1 through 8 present the plots for active working areas of 10,000, 20,000, 30,000, 40,000, 50,000, 60,000, 70,000, and 80,000 sf, respectively.

#### 4.4 Procedure To Select Berm Size

Procedure to select berm size using Figures 1 through 8:

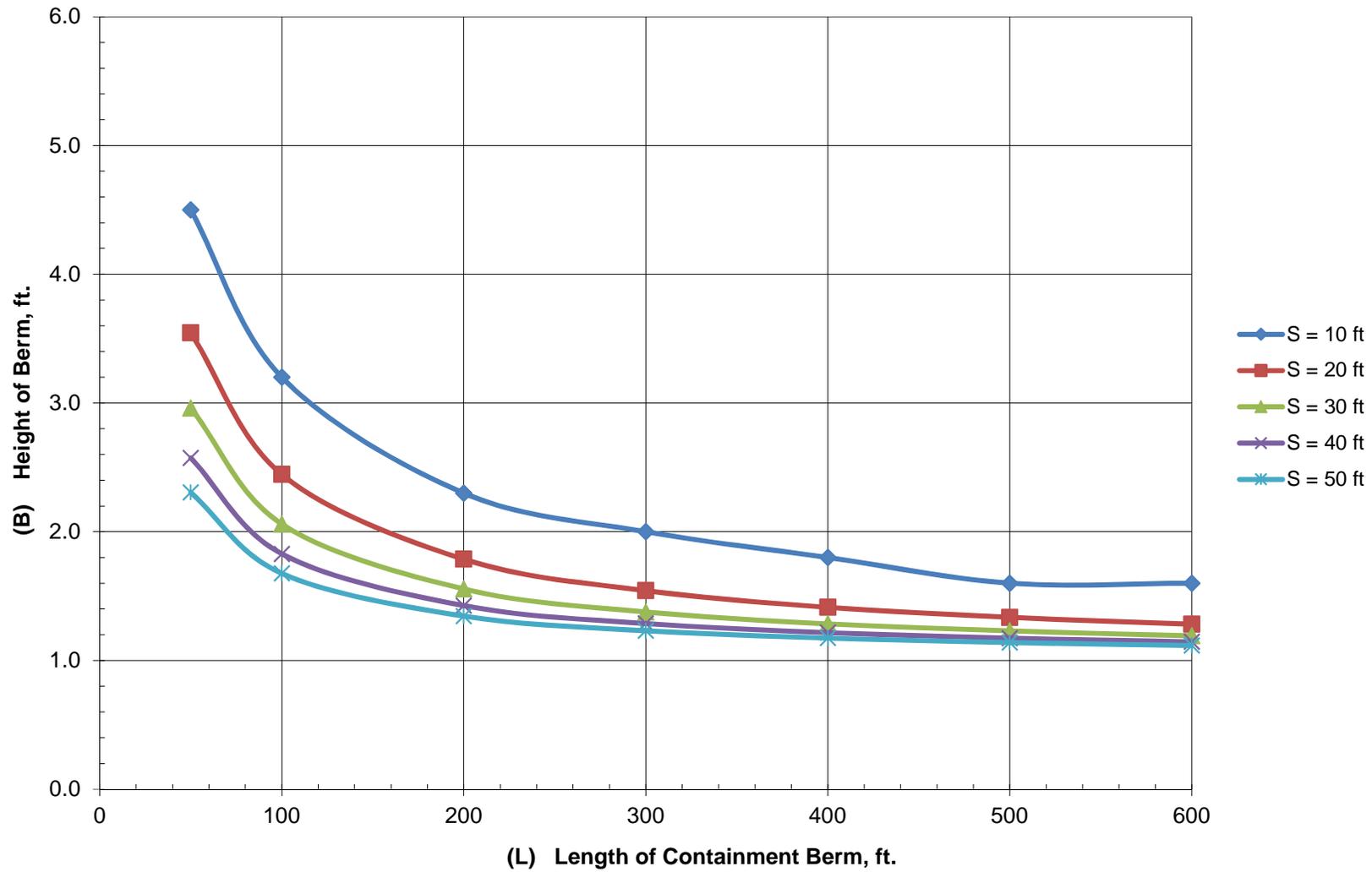
- 1) Determine the active face area (A);
- 2) Select a figure from Figures 1-8 that has an active area closest to, but no less than the actual A. For example, if A=25,000, choose Figure 3 (A=30,000);
- 3) Determine the minimum setback distance (S) for the daily operation, and select the corresponding curve. If the setback distance falls between the numbers shown on the figure, the closest but smaller value of S will be used. For example, if S=25 ft, choose the curve representing 20 ft; and
- 4) Measure the length of the active face containment berm, and determine the required berm height from the selected curve. Figures 1 through 8 cover a wide range of berm length (i.e. toe width of the active face) for normal waste fill operations. If the actual berm length is longer than the maximum value on the curve, the maximum berm length can be used to determine a conservative berm height. If the actual berm length is shorter than the minimum value on the curve, the operator can use equation (1) above to determine berm height.

Example using attached figures: A = 10,000 sf, s = 20 ft, L = 200 ft => B = 1.8 ft (from Figure 1, curve S = 20 ft).

#### 5.0 CONCLUSION

Figures 1 through 8 and the procedure discussed above provide guidance for determining the size of the stormwater containment berm based on the height of the active face (runoff area), the length of the containment berm, and the setback distance from the active face. The equations presented in this calculation may be used to determine the required berm height for various active face areas, berm lengths, and setback distances.

**Figure 1. Berm Height vs. Berm Length for Various Setbacks**  
**A = 10,000 sf**



**Figure 2. Berm Height vs. Berm Length for Various Setbacks**  
**A = 20,000 sf**

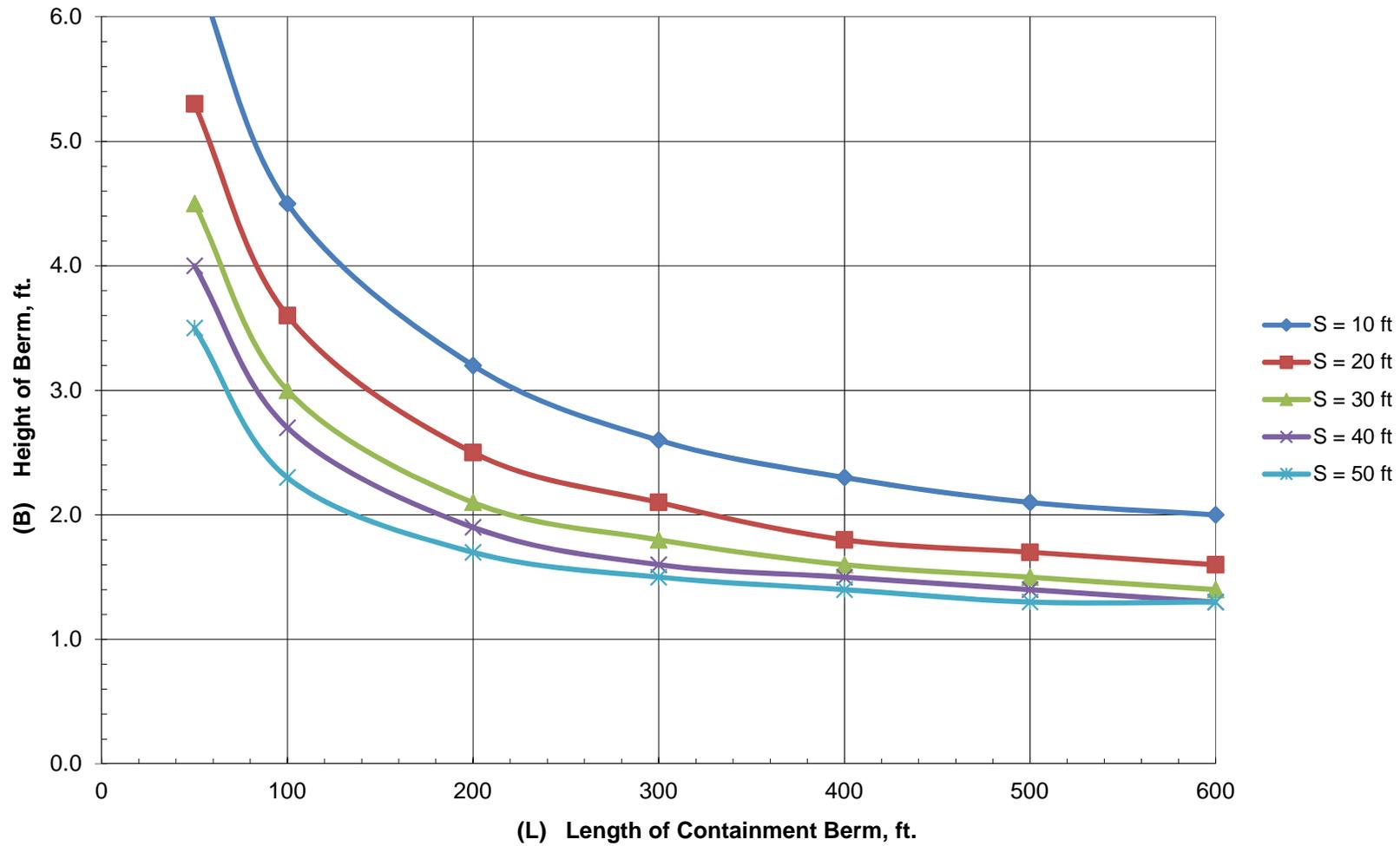
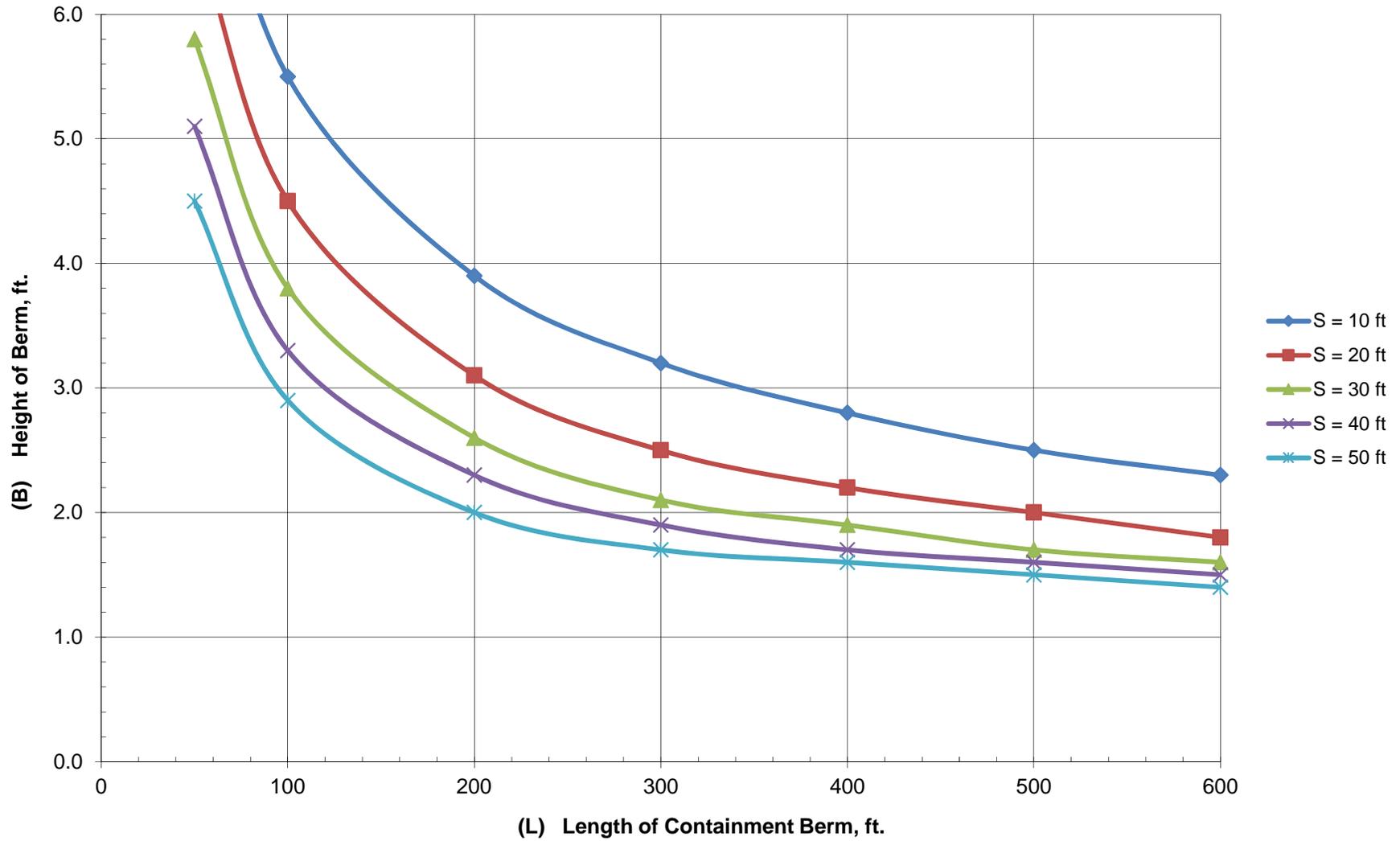
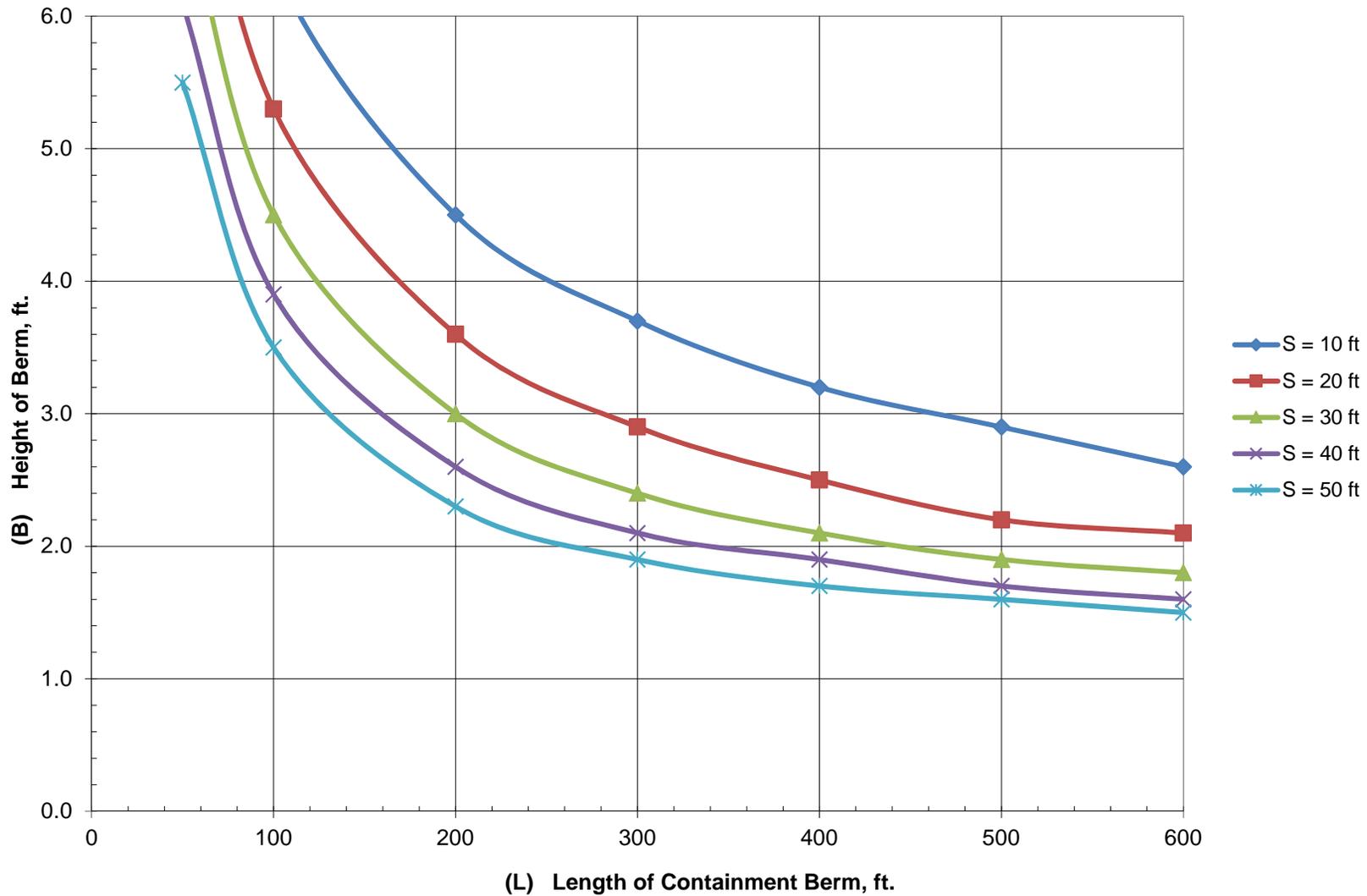


Figure 3. Berm Height vs. Berm Length for Various Setbacks

A = 30,000 sf



**Figure 4. Berm Height vs. Berm Length for Various Setbacks**  
**A = 40,000 sf**



**Figure 5. Berm Height vs. Berm Length for Various Setbacks**  
**A = 50,000 sf**

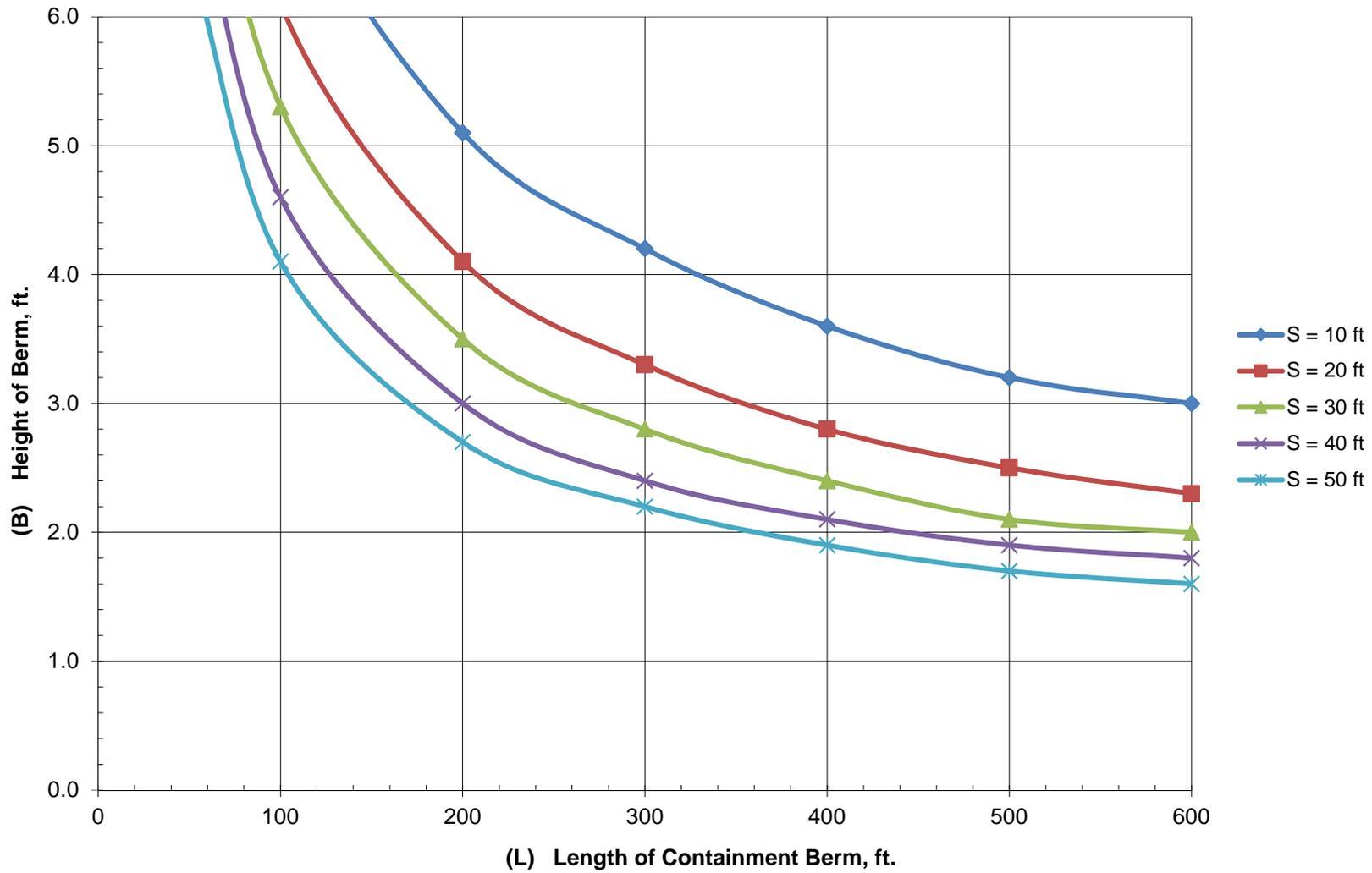
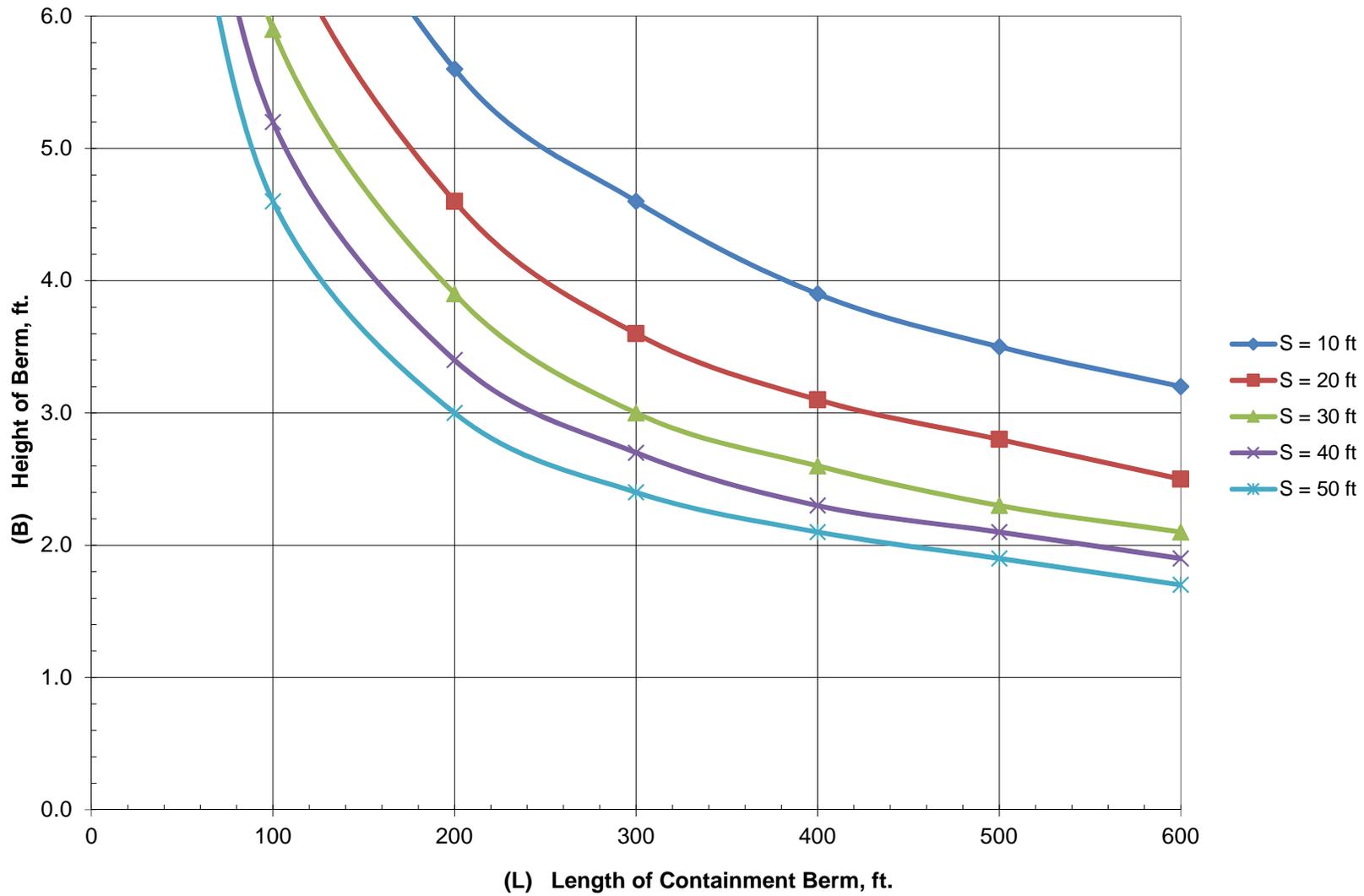


Figure 6. Berm Height vs. Berm Length for Various Setbacks

A = 60,000 sf



**Figure 7. Berm Height vs. Berm Length for Various Setbacks**  
**A = 70,000 sf**

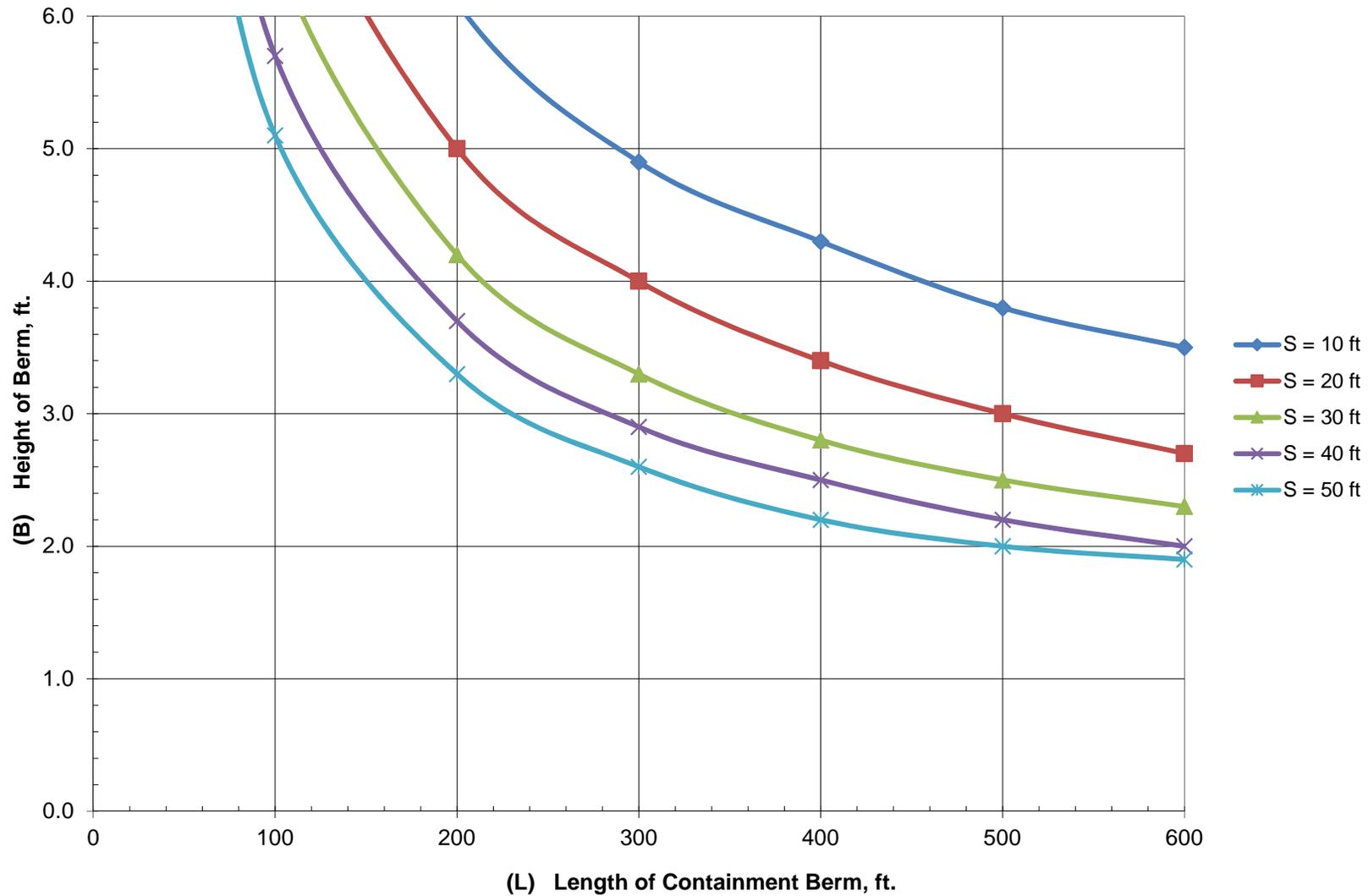
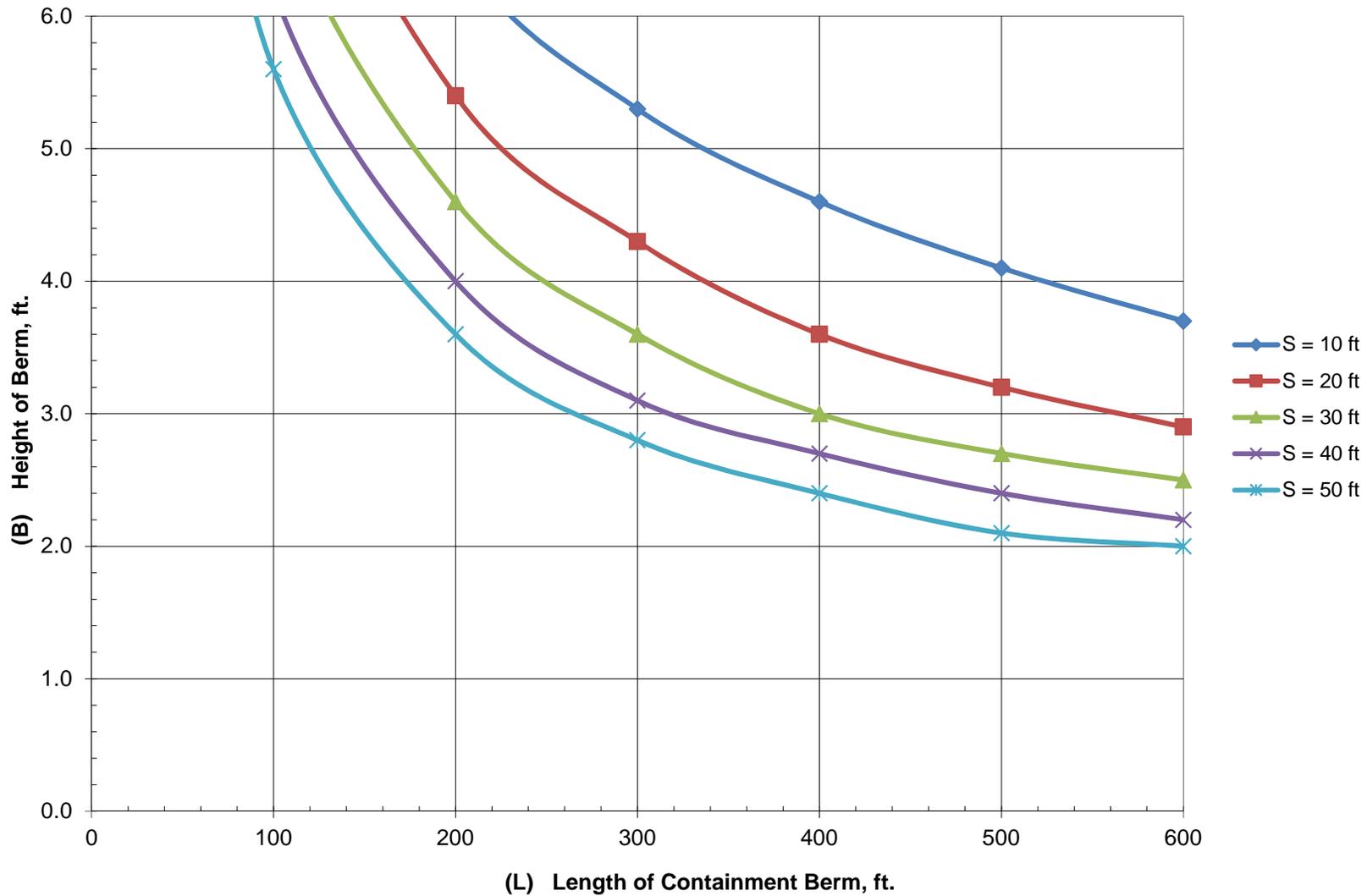


Figure 8. Berm Height vs. Berm Length for Various Setbacks

A = 80,000 sf



**APPENDIX III2F**

**FIGURES**



**LEGEND**

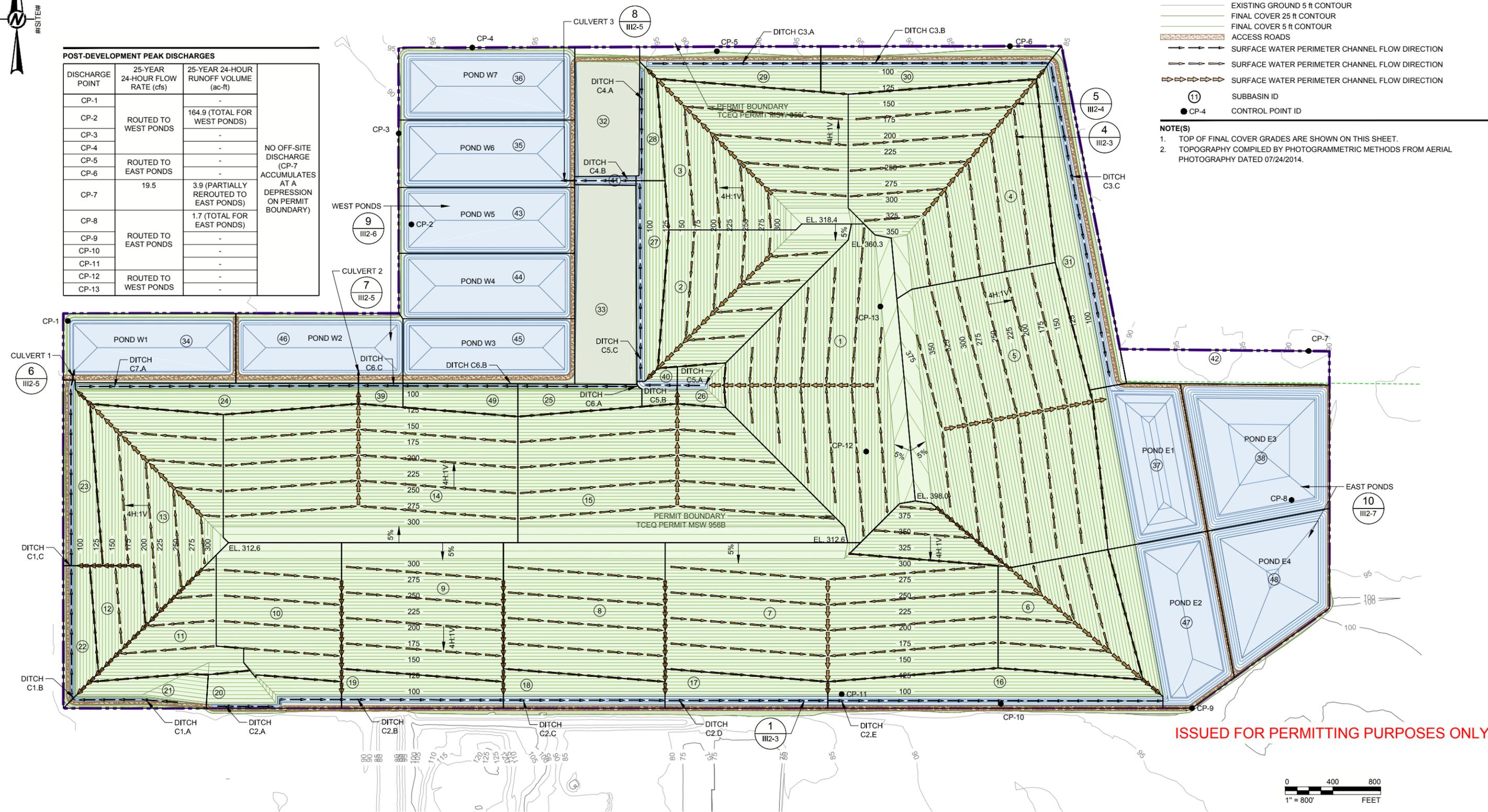
- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- 11 SUBBASIN ID
- CP-4 CONTROL POINT ID

**NOTE(S)**

1. TOP OF FINAL COVER GRADES ARE SHOWN ON THIS SHEET.
2. TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.

**POST-DEVELOPMENT PEAK DISCHARGES**

DISCHARGE POINT	25-YEAR 24-HOUR FLOW RATE (cfs)	25-YEAR 24-HOUR RUNOFF VOLUME (ac-ft)	
CP-1	-	-	NO OFF-SITE DISCHARGE (CP-7 ACCUMULATES AT A DEPRESSION ON PERMIT BOUNDARY)
CP-2	ROUTED TO WEST PONDS	164.9 (TOTAL FOR WEST PONDS)	
CP-3			
CP-4			
CP-5	ROUTED TO EAST PONDS	-	
CP-6			
CP-7	19.5	3.9 (PARTIALLY REROUTED TO EAST PONDS)	
CP-8	ROUTED TO EAST PONDS	1.7 (TOTAL FOR EAST PONDS)	
CP-9			
CP-10			
CP-11	ROUTED TO WEST PONDS	-	
CP-12			
CP-13	-	-	



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	MX	TNB	MX	CGD
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	VJE	TNB	MX	CGD

SE\*\*

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**POST-DEVELOPMENT DRAINAGE PLAN FOR SYNTHETIC GRASS COVER**

PROJECT NO. 1401491      APPLICATION SECTION III2F      REV. 1      1 of 1      FIGURE III2F-1

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B.

**APPENDIX III2G**

**LONG-TERM POND STORAGE CAPACITY ANALYSIS**

## LONG-TERM POND STORAGE CAPACITY ANALYSIS

Made By: MX  
 Checked by: CEI  
 Reviewed by: CGD

### 1.0 OBJECTIVE

Evaluate the long-term storage capacity, considering both the rainfall runoff and evaporation, of the stormwater storage and evaporation Ponds W1-W3, Ponds W4-W6, and Ponds E1-E4.

### 2.0 GIVEN

The proposed post-development ponds at the facility are retention ponds, designed to store the stormwater runoff. Additionally, the semi-arid weather at the site allows for the evaporation pond design.

The proposed ponds have been demonstrated to have adequate storage capacity to contain the runoff from the 25-year 24-hour design storm with adequate freeboard. Discussion is included in Part III2 § 2.3.5, Stormwater Ponds and calculations are provided in Part III2A, Detailed Drainage Calculations.

Precipitation and gross lake evaporation data published by Texas Water Development Board are used for the evaluation. Based on 61-year the historical weather data (from years 1954 to 2014) (Reference 1), the average annual lake evaporation is 62.6 inches and the average annual precipitation is 21.7 inches. Both the average monthly precipitation and total average annual precipitation are provided in the table below.



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Precipitation (inches)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
	1.10	1.20	0.75	1.28	2.36	2.31	1.69	1.90	4.20	2.51	1.22	1.18	<b>21.70</b>

To estimate the runoff volume to the ponds, we conservatively assumed that the average rainfall for each month occurs within 24 hours.

### 3.0 CALCULATIONS

The runoff volume was calculated using the NRCS Curve Number Method (Reference 2).

Composite SCS Curve Number	S = (1000/CN)-10
88	1.36

Runoff Volume (ac-ft)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual Total
Ponds W1-W3	3.20	3.85	1.27	4.39	12.94	12.51	7.40	9.07	29.88	14.25	3.98	3.72	<b>106</b>
Ponds W4-W6	3.70	4.44	1.46	5.06	14.94	14.44	8.55	10.48	34.50	16.45	4.59	4.29	<b>123</b>
Ponds E1-E4	8.30	9.98	3.29	11.38	33.56	32.44	19.20	23.54	77.49	36.95	10.32	9.64	<b>276</b>

Pond	Runoff Watershed Area (ac)	Annual Evaporation Volume from the Ponds (ac-ft)	Pond Storage Capacity (ac-ft)	25-Year 24-Hr Storm Runoff Volume (ac-ft)	Does Pond have Adequate Capacity to Contain the 25-Yr 24-Hr Storm Runoff?	Average Annual Runoff Volume (ac-ft)	Cumulative Stormwater Remain in Pond After 30 Years	Does Pond Have Adequate Capacity to Store the 30-Yr Cumulative Stormwater Volume?
	(a)	(b)	(c)	(d)	(c) > (d)?	(e)	(f)= ((e)-(b))*30	(c) > (f)?
Ponds W1-W3	123	127	220	73	YES	106	0	YES
Ponds W4-W6	142	150	283	85	YES	123	0	YES
Ponds E1-E4	319	249	882	187	YES	274	764	YES

**4.0 CONCLUSION/RESULTS**

The above calculations demonstrate that all the ponds will have adequate long-term storage capacity for a minimum of 30 years under the post-development conditions. As discussed earlier, this analysis is based on conservative assumptions (assuming the monthly rainfall occur within 24 hours). Furthermore, the pond water may be used for site use to irrigate the final cover surfaces. After a 30-year period, water use in the ponds may be re-evaluated in conjunction with the land use at the time.

**5.0 REFERENCES**

- 1) Texas Water Development Board Weather Data.
- 2) U.S. Soil Conservation Service (TR-55). 1986. Urban Hydrology for Small Watersheds, 2nd Edition. (USSCS Technical Release Number 55). Washington D.C.: United States Department of Agriculture.



PERMIT AMENDMENT APPLICATION

Part III, Attachment 3

# WASTE MANAGEMENT UNIT DESIGN

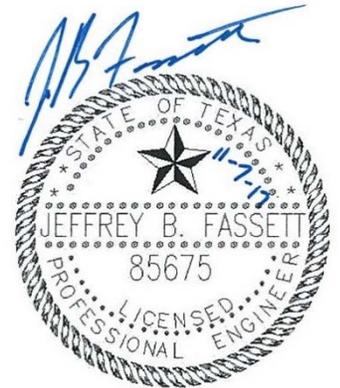
Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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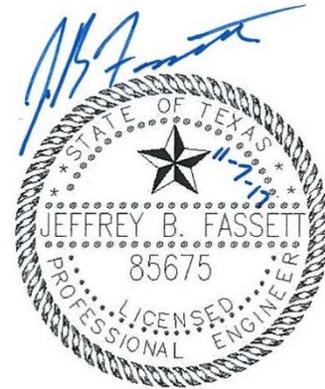
July 2017  
Revised: November 2017

Project No. 1401491



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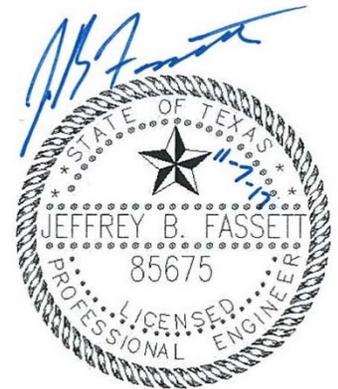
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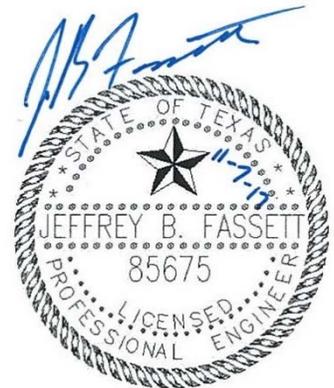
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## **EXECUTIVE SUMMARY**

30 TAC §330.63(d)(4)(G)

This Waste Management Unit Design Report including a Liner Quality Control Plan is prepared under the direction of a licensed professional engineer in accordance with 30 TAC §330.63(d)(4), and applicable sections of 30 TAC, Chapter 330, Subchapter H “Liner System Design and Operation.” The Edinburg Regional Disposal Facility (facility) has been designed to safeguard the health, welfare, and physical property of the people and the environment through various design considerations, which include volume and site life calculations, geotechnical analyses, liner design, leachate management, all-weather access, and other operational considerations.

## 1.0 LANDFILL UNITS

### 1.1 All-Weather Operation

30 TAC §30 TAC §330.63(d)(4)(A)

The facility makes provisions for all-weather operation and regularly maintain all-weather roads constructed for access to unloading areas designated for wet-weather operations.

#### 1.1.1 Publicly Owned Routes to the Facility

The facility entrance is located at 8601 Jasman Rd north of FM 2812 and is shared with the City's Type IV Landfill TCEQ Permit MSW-2302. Access to the facility entrance from US Hwy 281 is eastbound on FM 2812 and north onto Jasman Rd. Access roads to the facility entrance are constructed with an asphaltic concrete pavement surface overlaying a limed caliche base.

#### 1.1.2 Facility Entrance to Unloading Areas and Interior Access Roads

Access roads from the gatehouse and scales at the facility entrance to unloading areas and interior access roads are characteristically surfaced with caliche. Other all-weather road building materials such as compacted gravel, crushed stone, asphalt, or concrete may be used by the facility. Interior road locations are depicted on Figure III3-1, Facility Layout Plan.

#### 1.1.3 Tracking of Mud Minimization

As discussed in §4.16.2, Tracking of Mud Minimization of Part IV, Site Operating Plan, the tracking of mud 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.

## 1.2 Landfill Method

30 TAC §330.63(d)(4)(B)

The pattern of waste disposal will be governed by the area fill disposal method. Landfilling will occur below grade and above grade, depending on the stage of operational development and operational considerations. Initially, filling will occur above grade over the existing constructed fill areas to attain the

design top of waste grades. New landfill cells will be developed adjacent to existing filled areas and waste placement operations will continue below grade.

### **1.3 Landfill Unit Elevations**

30 TAC §330.63(d)(4)(C)

Figure III3-1, Facility Layout Plan illustrates an outline of the solid waste management units. Waste within Pre-Subtitle D Units 1-4 will either be relocated for development of Unit 8 or an Overliner- will be constructed for vertical expansion. Figure III3-2A, Subgrade Layout Plan – Overliner Option depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Overliner. Likewise Figure III3-2B, Subgrade Layout Plan –Unit 8 Option, depicts the subgrade elevations of the lateral expansion cells within Unit 7 and Unit 8. The elevation of deepest excavation (EDE) for the facility is 70 ft-msl located at the bottom of leachate collection sumps for each cell within Units 6, 7, and 8 as depicted on Figures III3-2A and III3-2B.

Figure III3-3, Final Contour Map depicts the maximum final cover elevation of approximately 398 ft-msl. The maximum waste elevation is the final cover elevation minus the thickness of final cover and is dependent on thickness of the final cover lining option used. Part III7, Closure Plan details final cover lining options.

### **1.4 Estimated Rate of Solid Waste Deposition and Operating Life**

30 TAC §330.63(d)(4)(D)

Disposal capacity as referenced in 30 TAC §330 Subchapter P is amount of waste that a facility can dispose. Similarly, the EPA defines landfill capacity as the amount of airspace volume. The maximum total disposal capacity of the facility is 87,301,156 cubic yards, and the maximum remaining disposal capacity will be 76,304,934 cubic yards of waste and daily cover, based on the FY 2016 MSW Annual Report. It is anticipated that the rate of waste disposal will reach approximately 1,500,000 tons per year and that the facility will have a site life of approximately 63.5 years. The total disposal capacity and operational life calculations are provided in Appendix III3A, Volume and Site Life Calculations.

As population, economic conditions, and available landfill disposal capacity change within the region, the volume of incoming waste could vary considerably. The facility will maintain quarterly records to document waste acceptance rates. If the rate exceeds the estimated rate and is not due to a temporary occurrence, the City will file a permit modification application consistent with 30 TAC §330.125(h). As provided by rule, the estimated waste acceptance rate is not a limiting parameter of the permit.

## 1.5 Landfill Unit Cross-Sections

30 TAC §330.63(d)(4)(E) & (F)

Figure III3-4A, Fill Cross-Sections Location Map is a map showing a sufficient number of cross-sections across the facility, both latitudinally and longitudinally, so as to accurately depict the existing and proposed depths of all fill areas within the site. These fill cross-sections go through or very near soil borings where boring logs obtained from Part III4B, Soil Boring Logs are shown on the plan profiles, Figures III3-4B – III3-4E, Fill Cross-Sections. These plan profile figures provide an inset key map of the fill cross-section plan and clearly show the following content provided in Table III3-1, Fill Cross-Section Figures III3-4B – III3-4E.

**Table III3-1: Fill Cross-Section Figures III3-4B – III3-4E**

Plan Profile Content	A – A'	B – B'	C – C'	D – D'
Plan Inset Key Map	✓	✓	✓	✓
Boring Logs	✓	✓	✓	✓
Top of Levee	✓	✓	✓	✓
Top of Proposed Fill (Top of Final Cover)	✓	✓	✓	✓
Maximum Elevation of Proposed Fill	✓	✓	✓	✓
Top of the Wastes	✓	✓	✓	✓
Existing Ground	✓	✓	✓	✓
Bottom of the Excavations (Subgrade)	✓	✓	✓	✓
Side Slopes of Trenches and Fill Areas	✓	✓	✓	✓
Gas Vents or Wells	✓		✓	
Groundwater Monitoring Wells	✓	✓	✓	✓
Initial and Static Levels of Any Water Encountered	✓	✓	✓	✓
Compacted Perimeter Berms	✓	✓	✓	✓

Notes: 1. Items not checked are not applicable.  
 2. Perimeter berm design dimensions shown on figures.

## 2.0 WASTE MANAGEMENT UNIT ENGINEERING ANALYSES

Analyses were performed to assess the performance of the landfill with respect to settlement and slope stability. Each of these analyses is described in detail in the following sections.

### 2.1 Settlement Analysis

Facility floor settlement will occur in Strata I through III. Review of the excavation plan indicates that much of Stratum I will be removed prior to construction of the liner system and that much of the Edinburg Regional Disposal Facility floor will be founded on a thin layer of remaining Stratum I. For this analysis, settlement critical cross-sections are cut through a section of the Edinburg Regional Disposal Facility with the thickest waste above and the most critical subsurface conditions. Intermittent points along the critical cross-section are analyzed for settlement and post-settlement to define slopes. The cross-section location is referred to

as Line A, located in Unit 7, Cell 2A and 2B on a north-south direction. The cross-section begins at the facility perimeter and progress toward the facility center where the proposed final elevation is highest.

The settlement analyses indicate that the minimum total settlement will be approximately 4 feet and the minimum post-settlement grade on the floor will be 0.6%. The post-settlement grade was used in the leachate header pipe sizing calculations (Appendix III3D-3A).

The post-settlement floor grades will maintain positive drainage and allow the leachate to drain towards the leachate collection system under the conditions analyzed. The results of the settlement analysis are presented in Appendix III3B-1, Settlement Analysis.

## **2.2 Stability Analysis**

The results of the stability analyses indicate that the proposed slopes are stable under the conditions analyzed. For each condition analyzed, the minimum calculated factor of safety exceeds the recommended factor of safety.

Based on the Corps of Engineers "Design and Construction of Levees" manual (EM 1110-2-1913), the recommended factors of safety are 1.3 for short-term and 1.5 for long-term conditions, respectively. Short term conditions include:

- Excavated slopes (undrained conditions);
- Sideslopes; and
- Interior waste slopes.

All other conditions are long-term.

Slope stability analyses were performed using limit equilibrium methods to assess the stability of the proposed landfill. In particular, stability of the proposed excavated landfill sideslopes, stability of the protective cover on landfill sideslopes, stability of the interior waste slopes, overall stability of the final filled landfill, and stability of the final cover system were evaluated.

In general, the analyses consist of the following:

- Characterization of the critical cross-section (e.g., the geometry, geology, geosynthetic interfaces, and groundwater conditions).
- Selection of appropriate strength parameters.
- Analysis under anticipated critical conditions.

The analyses are summarized in the following sections.

### **2.2.1 Stability Analysis of Excavated Slopes**

A stability analysis was performed to consider potential failure surfaces for excavation of waste management units. The excavation is a 3H:1V slope with a crest elevation of 95 ft-msl and the minimum excavation elevation is 70 ft-msl.

Potential failure surfaces were analyzed and the minimum factor of safety was computed based on limit equilibrium methods following Spencer's and GLE/Morgenstern-Price methods of analysis using SLIDE Version 7.0, an integrated slope stability analysis program for personal computers.

Results from the method providing the least factor of safety is presented Appendix III3B-2A. The factor of safety is 4.2 for the total stress condition and 2.0 for the effective stress condition. These values indicate the excavation slopes will be stable.

### **2.2.2 Stability of Sideslope Liner**

A stability analysis was performed to consider potential veneer failure of the sideslope liner. The sideslope is a 3H:1V slope with a crest elevation of 95 ft-msl, a minimum elevation of 70 ft-msl, and a maximum length of 75 ft.

The critical interface on the slope was analyzed and the minimum factor of safety was computed using an infinite slope analysis. Based on a review of the literature and unpublished data on similar materials under similar loading conditions, the critical interface shear strength within the sideslope alternative liner system was estimated to be 24 degrees. According to Appendix III3B-2B-2, the maximum head over the geomembrane is less than the thickness of the geocomposite drainage layer because the double-sided geocomposite drainage layer will have a transmissivity adequate to convey water infiltrating through the protective cover over the maximum sideslope length.

Results from the analysis is presented Appendix III3B-2B. The factor of safety for veneer slope stability is 1.34 with the use of conservative parameters in the analysis. This value indicates the sideslope liner will be stable.

### **2.2.3 Stability of the Interior Waste Slopes**

Interior waste slope stability analyses were performed using the limit equilibrium slope stability method to determine the factor of safety against sliding along the liner. Based on a review of the floor grades and filling sequence, it was identified that the interior waste slope in Unit 7, Cells 6B through 9B is the most critical case, where the filling and floor slope occur in the same direction with no buttress effect from existing waste or the floor gradient.

Potential failure surfaces were analyzed and the minimum factor of safety was computed based on limit equilibrium methods following Spencer's and GLE/Morgenstern-Price methods of analysis using SLIDE

Version 7.0, an integrated slope stability analysis program. Two possible waste filling slopes were considered; a continuous 3H:1V temporary waste slope with no benches, and a 3H:1V temporary waste slope with one bench at the middle of the slope. The maximum waste height is conservatively assumed at 400 ft-msl which is greater than the proposed waste thickness. The strength parameters were either conservatively chosen from published studies or based on test results for similar conditions.

Results from the method providing the least factor of safety are presented in Appendix III3B-2C. Under the assumed conservative scenarios, results indicate that the interior waste slope at 3H:1V may be filled up to the final elevation with an acceptable factor of safety. However, to facilitate site operations and to account for any operational uncertainties, a 100-foot wide bench at the midpoint of the 3H:1V interior slope is advised. Slope stability analyses for this condition are also presented in Appendix III3B-2C.

#### **2.2.4 Stability of Final Filled Configuration**

Final filled configuration stability analyses were performed using limit equilibrium methods to determine the factors of safety against sliding or failure. Based on a review of the design grades, two reasonable worst-case configurations were considered: a section along Unit 7, Cell 2, having 3H:1V excavation sideslopes and 4H:1V final cover slopes to a crest elevation at 400 feet msl; and a section along Unit 7 with similar slopes running west to east along Cells 1B through 5A.

Potential failure surfaces were analyzed and the minimum factor of safety was computed based on limit equilibrium methods following Spencer's and GLE/Morgenstern-Price methods of analysis using SLIDE Version 7.0, an integrated slope stability analysis program for personal computers. The strength parameters are conservatively estimated or based on test results for similar conditions, and the reasonable worst case configuration.

Results from the method providing the least factor of safety are presented in Appendix III3B-2D. Along Section A the factor of safety is 1.9 for block sliding and 2.9 for circular failure. The corresponded factor of safety for Section B is 2.0 for block sliding and 2.9 for circular failure. These values indicate the final-filled configuration will be stable.

#### **2.2.5 Stability of Final Cover System**

A stability analysis of the final cover liner system was performed using an infinite slope analysis to estimate the potential for sliding to occur following closure of the landfill cells. A worst-case section, consisting of a 1,200-foot long, 25% slope was analyzed. Based on a review of the literature and unpublished data on similar materials under similar loading conditions, the critical interface shear strength within the final cover liner system was estimated to be 21 degrees.

The analyses are included in Appendix III3B-2E and indicate that, provided the geocomposite drainage layer is adequate to convey drainage without building up pore water pressures in the geocomposite, the factor of safety against sliding will be approximately 1.5.

Additional analyses (also included in Appendix III3B-2E) were performed to determine the geocomposite drainage layer transmissivity required to adequately convey surface water infiltration over the maximum final cover slope length. If the minimum measured transmissivity value reported in Appendix III3-2E is not met, the maximum flow length must be reduced (i.e., the geocomposite drainage layer must be “daylighted”) in direct proportion to the ratio of the actual measured transmissivity and the required measured transmissivity. A detail depicting “daylighting” is included as detail 4 in Attachment 7, Closure Plan, Figure III7-3A, Conventional Composite Final Cover Details.

## **2.3 Overliner**

Waste within Pre-Subtitle D Units 1 – 4 will either be relocated for development of Unit 8 or an overliner will be constructed for vertical expansion. The subgrade of the overliner will be the in-place final cover grades previously permitted and extend to Unit 6 as depicted on Figure III3-9A, Overliner Subgrade Layout. Details of the overliner design are presented on Figures III3-7A, III3-9C, and III3-9D. Overliner design analyses are included in Appendix IIIB-3, Overliner.

### **2.3.1 Settlement**

Appendix III3B-3A, Settlement Analysis demonstrates positive drainage is maintained for the leachate collection and removal system.

Settlement for the overliner system will primarily be the result of compression of the underlying old waste and, to a lesser extent, consolidation of the foundation soil layers due to increased loads from the new waste and final cover placement. Old waste settlement consists of two components: 1) time-dependent secondary compression (or creep), and 2) primary settlement caused by the stress increase from new waste and final cover. Secondary compression within the foundation material will be very small; therefore, only consolidation settlement was evaluated below the landfill.

Settlement below the overliner was estimated and used to determine the post-settlement grades of the overliner. The minimum post-settlement grade in the direction of leachate flow is approximately 0.4 percent; therefore, positive drainage will remain at the end of the 30-year post-closure period.

### **2.3.2 Strain Analysis**

Appendix III3B-3B, Strain Analysis demonstrates the induced tensile strain due to differential settlement of existing waste and the formation of a localized depression beneath the liner system is below the minimum allowable strain of the liner components.

Using settlement results, the difference in liner length between prior and post settlement was analyzed. The evaluation showed the liner will mainly be under compression with liner shortening. A very limited portion will experience a lengthening with a strain of 0.3 percent, well below the allowable strain of 5 percent.

An evaluation of strain in the overliner due to localized depressions (subsidence) near the surface of the old waste was performed, and is included as Appendix III3B-3B, Strain Analysis. A parametric analysis, comparing the diameter of the subsidence area and depth at its center to the allowable strain of the overliner components, indicates that the ratio of depth to diameter is approximately 0.14 for 5 percent strain and 0.20 for 10 percent strain.

Depressions of this magnitude would only be expected if voids or highly compressible material are present immediately below the overliner. To reduce the potential for subsidence below the overliner system, the existing waste will be surcharged by placing at least 20 feet of soil for a minimum 3-month period. The surcharge will collapse voids and compress the underlying material.

### **2.3.3 Stability Analysis**

Final filled configuration stability analyses were performed using limit equilibrium methods to determine the factors of safety against sliding or failure. Based on a review of the design grades, the reasonable worst-case configuration was assumed to consist of a section along the western side of Units 3 and 4, having 4H:1V final cover slopes to a crest and maximum fill elevation of approximately 312.6 ft-msl. Compared to other sections through the pre-Subtitle D area, the chosen section exhibits thicker existing waste. Additionally, the toe of the future waste along the chosen section is less supported by the perimeter berm.

Potential failure surfaces were analyzed and the minimum factor of safety was computed based on limit equilibrium methods following Spencer's and GLE/Morgenstern-Price methods of analysis using SLIDE Version 7.0, an integrated slope stability analysis program for personal computers. The strength parameters are conservatively estimated or based on test results for similar conditions, and the reasonable worst case configuration.

The results from the method providing the least factor of safety is presented Appendix III3B-3C. The factor of safety is 2.0 for block sliding and 3.0 for circular failure. These values indicate the final-filled configuration will be stable.

## **3.0 LINER DESIGN CRITERIA**

30 TAC §§330.331(a)(2) & 330.331(b)

The Pre-Subtitle D Units 1 – 4 consist of cells extending to a depth of approximately 15 feet below original ground surface. Some of the cells are reported to include a single geomembrane liner. None of the cells

include a leachate collection system. The approximate grades of the Pre-Subtitle D cells are shown on Figure III3B-3A-1.

The liner design for the facility is not composed of “composite liner” components defined by 30 TAC §330.331(b); consisting of at least a 2-foot layer of re-compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/s and a 60-mil high density polyethylene (HDPE) geomembrane liner component.

An alternative liner design is currently approved under permit TCEQ Permit MSW-956B for remaining Subtitle D construction and is the liner design to be used for expansion cells in Unit 7 and Unit 8. The alternative liner design consists of, from bottom up, a geosynthetic clay liner (GCL), a 60-mil high-density polyethylene (HDPE) geomembrane liner, double-side geocomposite composed of a geonet bonded to geotextile on both sides, and 2 feet of protective cover soil. The overliner design discussed in §2.3, Overliner will use 60-mil linear low-density polyethylene (LLDPE) instead of HDPE because its elastic properties are better suited for potential waste settlement. Alternative liner details are included on Figure III3-7, Alternative Liner System Details. Overliner design details and cross-sections are shown on Figures III3-9B, III3-9C, and III3-9D.

As discussed in §4.0, Leachate Collection and Removal System (LCRS) is designed to maintain less than a 30-centimeter depth of leachate over the alternative liner system.

Portions of the landfill excavation extend below the seasonal high water table. Consistent with current practice at the site, toe drains and a geocomposite underdrain along the sideslopes will be installed to control groundwater. The underdrain will be maintained and operated until sufficient ballast is in place to resist the uplift pressures below the liner system. The underdrain analyses are included in Appendix III3E-2. The underdrain system layout and details are shown on Figures III3-6A, III3-6B, and III3-8.

### **3.1 Alternative Liner Design**

#### **30 TAC §330.335**

Alternative liner designs, which must include a leachate management system, may be authorized by the TCEQ if a demonstration by computerized design modeling that the maximum contaminant levels detailed in 30 TAC §330.331, Table 1 will not be exceeded at the point of compliance. At the discretion of the TCEQ, a field demonstration may be required to prove the practicality and performance capabilities of an alternative liner design.

### **3.2 Point of Compliance Demonstration**

30 TAC §330.331(a)(1)

The liner design ensures the concentration values listed in Table 1 of 30 TAC §330.331(a)(1) will not be exceeded in the uppermost aquifer at the point of compliance, as determined in 30 TAC §330.403. The alternative liner design was evaluated to demonstrate that it provides a level of groundwater protection that is greater than or equal to the level of protection provided by a “composite liner” system. The evaluation presented in Appendix III3C-1, Point of Compliance Demonstration indicates that substituting the clay component with a geosynthetic clay liner (GCL) will provide a greater or equivalent level of groundwater protection at the facility. In addition, fate and transport modeling performed on the alternative liner system demonstrates that the maximum contaminant levels detailed in 30 TAC §330.331(a)(1) will not be exceeded at the point of compliance as a result of hypothetical leakage through the liner system.

### **3.3 Constructed of Chemically Resistant Materials**

30 TAC §330.333(1)

The alternative liner system will be constructed of materials including HDPE (or LLDPE for the overliner system) and polyester or polypropylene are chemically resistant to leachate characteristically generated by municipal solid waste facilities. HDPE or LLDPE materials are used for the geomembrane and polyester or polypropylene materials are used in the geotextile component of the GCL and geocomposite drainage layer.

### **3.4 Liner Design Considerations**

30 TAC §330.331(c)

When approving an alternative liner design that ensures the concentration values listed in Table 1 of 30 TAC §330.331(a)(1) will not be exceeded in the uppermost aquifer at the point of compliance, as determined in 30 TAC §330.403, the TCEQ may consider, but is not limited to, the following factors:

- the hydrogeologic characteristics of the facility and surrounding land;
- the climatic factors of the area;
- the volume and physical and chemical characteristics of the leachate;
- the quantity, quality, and direction of flow of groundwater;
- the proximity and withdrawal rate of the groundwater users;
- the availability of alternative drinking water supplies;
- the existing quality of the groundwater, including other sources of contamination and their cumulative impacts on the groundwater and whether groundwater is currently used or reasonably expected to be used for drinking water;
- public health, safety, and welfare effects; and
- practicable capability of the owner or operator.

The alternative liner design is currently approved under permit TCEQ Permit MSW-956B. The aforementioned factors and any factors not addressed in this application shall be provided to the TCEQ upon request to aid in considerations.

#### **4.0 LEACHATE COLLECTION AND REMOVAL SYSTEM**

30 TAC §§330.331(a)(2) & 330.333

The leachate collection and removal system (LCRS) is designed and constructed to maintain less than a 30-centimeter depth of leachate over the alternative liner system and eliminate potential migration of landfill leachate into groundwater and to meet the requirements of 30 TAC §330.333. The LCRS will collect and remove leachate from the top of the alternative liner, channel leachate to designated leachate collection sumps, and pump leachate from the leachate collection sump into a leachate force main for disposal.

The LCRS drainage layer is comprised of a double-sided geocomposite: a high density polyethylene (HDPE) geonet bonded with geotextile on both sides. The leachate collection system details are presented on Figure III3-8, Leachate Collection and Removal System and Underdrain Details. Leachate is collected from the drainage layers into a leachate collection trench constructed of perforated HDPE piping encased by a drainage aggregate and wrapped in a geotextile filter. The leachate collection trench discharges into leachate collection sumps likewise constructed of drainage aggregate and wrapped in geotextile filter. From within the leachate collection sumps, an HDPE upslope riser pipe houses a pump that removes accumulated leachate from within the leachate collection sumps into a leachate force main for discharge to the public sewer system as depicted on Figures III3-5A and III3-5B.

The LCRS is designed and operated to function through the scheduled closure and post-closure care period of the landfill considering the following factors:

- constructed of materials that are chemically resistant to the leachate expected to be generated
- of sufficient strength and thickness to prevent collapse under the pressures exerted by overlying wastes, waste cover materials, and by any equipment used at the landfill
- estimated rate of leachate removal;
- capacity of sumps;
- pipe material and strength, if used;
- pipe network spacing and grading, if used;
- collection sump materials and strength;
- drainage media specifications and performance; and
- demonstration that pipes and perforations will be resistant to clogging and can be cleaned.

#### **4.1 Groundwater Inflow**

30 TAC §330.337(d)

The LCRS is designed to handle both the leachate generated and the groundwater inflow from materials beneath and lateral to the liner system. Appendix III3D-2, Groundwater Inflow demonstrates the calculated maximum volume of groundwater inflow based on determination of the permeability and potentiometric conditions of the alternative liner system and of the materials surrounding the liner system. Groundwater inflow into the leachate collection system using the alternative liner system is negligible relative to leachate production rates.

#### **4.2 Rate of Leachate Removal**

30 TAC §330.333(3)(A)

The estimated rate of leachate removal is operationally equivalent to the leachate production rate. The HELP Model (Hydraulic Evaluation of Landfill Performance, US Army Corps of Engineers, Waterways Experiment Station, Version 3.07, November, 1997) was used to determine the leachate production rate (impingement rate) for various conditions during the life of the landfill. A summary of HELP model results is provided in Appendix III3D-1, HELP Model Evaluations. The maximum rate of leachate removal is 962 cf/ac/day.

#### **4.3 Drainage Media Specifications and Performance**

30 TAC §330.333(F)

Drainage media used in the LCRS include double-sided geocomposite and perforated HDPE header piping encased by a drainage aggregate wrapped in a filter geotextile. Evaluations of performance and required specifications of drainage media are provided in Appendix III3D-3, Drainage Media Specifications and Performance.

##### **4.3.1 Constructed of Chemically Resistant Materials**

30 TAC §330.333(1)

The LCRS will be constructed of materials including HDPE, polyester or polypropylene, and drainage aggregate that are chemically resistant to the leachate expected to be generated by municipal solid waste facilities. HDPE materials are used in the geonet component of the double-sided geocomposite drainage layer and piping within the leachate collection trench and leachate collection sump. Drainage material used within the leachate collection trench and leachate collection sump is required to be resistant to carbonate loss. The geotextile component of the double-sided geocomposite drainage layer, leachate collection trench, and leachate collection sump utilize 100-percent continuous-filament polyester or polypropylene.

#### **4.3.2 Double-sided Geocomposite Drainage Layer**

The double-sided geocomposite drainage media is a high density polyethylene (HDPE) geonet bonded with geotextile on both sides. Appendix III3D-1, HELP Model Evaluation demonstrates the design transmissivity using the impingement rate under the worst case scenario and the maximum lengths and slopes from the subgrade layout plan presented in Figures III3-2A and III3-2B. Also provided are transmissivity specification requirements for the double-sided geocomposite to be used; reduction factors were applied to consider potential long-term creep, chemical clogging, biological clogging, and intrusion of geotextile into the geonet component.

#### **4.3.3 Leachate Collection Trench Header Pipe Sizing**

The leachate collection trench is a perforated HDPE header pipe encased by a drainage aggregate wrapped in a filter geotextile. Appendix III3D-3A, Header Pipe Sizing evaluates the size of header pipe required to convey the maximum anticipated leachate generated using the maximum impingement rate from the worst case scenario provided by Appendix III3D-1, Help Model Evaluation, the slope of header pipe post-settlement provided by Appendix III3B-1, Settlement, and the maximum contributing area from the subgrade layout plan presented in Figures III3-2A and III3-2B. The header pipe sizing is more than adequate for the maximum leachate generated.

#### **4.3.4 Leachate Collection Trench Header Pipe Perforations**

Appendix III3D-3B, Header Pipe Perforations evaluates the perforation size required to convey the maximum leachate generated using the maximum leachate generation rate from the worst case scenario provided by Appendix III3D-1, Help Model Evaluation. The inflow rates into the header pipe perforations exceeds the maximum leachate generated.

#### **4.3.5 Pipe Material and Strength**

30 TAC §§330.333(3)(C) & 330.333(3)(E)

Pipes used in the LCRS are of HDPE material. Appendix III3D-3C, HDPE Pipe Structural Design evaluates the structural integrity of the leachate collection trench header pipes and sump riser pipes to withstand maximum overburden pressures exerted by overlying wastes, waste cover materials, and by any equipment used at the landfill.

The vertical pressures were determined for overburden pressures of the overlying wastes and waste cover materials and for equipment loading over the pipe with 5 feet of waste and 2 feet of protective cover. Overburden pressures were greater than that of equipment loading, thus overburden was used for analysis of structural integrity of the designed HDPE header pipe and sump riser pipe which include wall crushing, wall buckling and ring deflection.

Review of the results shows that both pipes have satisfactory factors of safety against wall crushing and buckling and pipe deflections are lower than the allowable. Therefore the HDPE pipes can withstand the vertical pressure exerted.

#### **4.3.6 Sufficient Strength and Thickness**

30 TAC §330.333(2)

The leachate collection and removal system (LCRS) will be of sufficient strength and thickness to prevent collapse under the pressures exerted by overlying wastes, waste cover materials, and by any equipment used at the landfill. As previously discussed in the §4.3.5, the HDPE header and riser pipes are of sufficient strength and thickness. The double-sided geocomposite drainage layer and drainage aggregate used in the LCRS have a compressive strength much greater than the vertical pressures calculated in Appendix III3D-3D, HDPE Pipe Structural Design.

#### **4.3.7 Drainage Aggregate**

Drainage aggregate wrapped in a filter geotextile is used in both the leachate collection trenches and leachate collection sumps. The aggregate used shall consist of durable particles of crushed stone, natural gravel, or light weight aggregate free of silt, clay, or other unsuitable materials and shall have a loss mass due to calcium carbonate of less than 15 percent. To prevent potential clogging of aggregate into the header pipe perforations, the gradation of aggregate shall be such that the ratio of 85 percent size of aggregate to the header pipe perforation size is greater than 1.7.

#### **4.3.8 Pipe Perforations Resistant to Clogging**

30 TAC §330.33(G)

Pipe perforations will be resistant to clogging because leachate collection pipes are encased by a drainage aggregate with a gradation sizing described in §4.3.4 wrapped in a filter geotextile. The longest length of leachate collection trench as shown on the subgrade layout plans presented in Figures III3-2A and III3-2B is approximately 1900 ft. According to industry standard, the current practice of hydro-jetting can clean header pipes to a distance greater than 2000 ft.

#### **4.3.9 Leachate Collection Trench Spacing and Grading**

30 TAC §330.333(3)(D)

Leachate collection trenches are graded at 1% along subgrade low lines created from the convergence of 2% floors as shown on the subgrade layout plans presented in Figures III3-2A and III3-2B.

#### **4.3.10 Leachate Collection Sump Capacity**

30 TAC §330.333(3)(B)

Appendix III3D-4, Sump Capacity Calculations utilizes typical sump dimensions and porosity of the drainage aggregate to determine leachate capacity. The maximum leachate generated, based on the maximum contributing area and the maximum leachate generation rate provided by Appendix III3D-1, Help Model Evaluation was compared to the sump leachate capacity to determine an estimated time to fill the sump. Based on results, the leachate collection sump design provides adequate capacity and cycle time for leachate pumping.

### **5.0 BALLAST AND DEWATERING SYSTEM**

30 TAC §330.337(e)

Waste management unit excavations extend below the seasonal high water table resulting in upward or inward hydrostatic forces on the alternative liner. The alternative liner and the waste placed above it will provide the ballast (weight) to protect the liner system from uplift forces from groundwater. To offset hydrostatic uplift during construction, an active dewatering system will be constructed and operated until sufficient ballast is in place.

#### **5.1 Ballast**

30 TAC §330.337(b)(1)

To offset hydrostatic uplift, the weight of the alternative liner and the waste placed above it will provide the ballast (weight) to protect the liner system from uplift forces from groundwater. The ballast counteracting the hydrostatic forces include the soil materials from the leachate collection system components, the protective cover, waste above the liner and leachate collection system, and the soil materials from the interim cover. The weight of the geosynthetic components of the leachate collection system and any geosynthetic components of the interim cover is considered negligible. Appendix III3E-1, Ballast Calculations demonstrate that the ballast, including waste, offset hydrostatic uplift by a factor greater than 1.5. A Ballast Evaluation Report (BER) must be submitted to the TCEQ when the ballast verification demonstrates that further ballasting or dewatering is no longer necessary as outlined in Appendix III3F §8.3, Ballast Evaluation Report.

#### **5.2 Dewatering System**

30 TAC §330.337(b)(2)

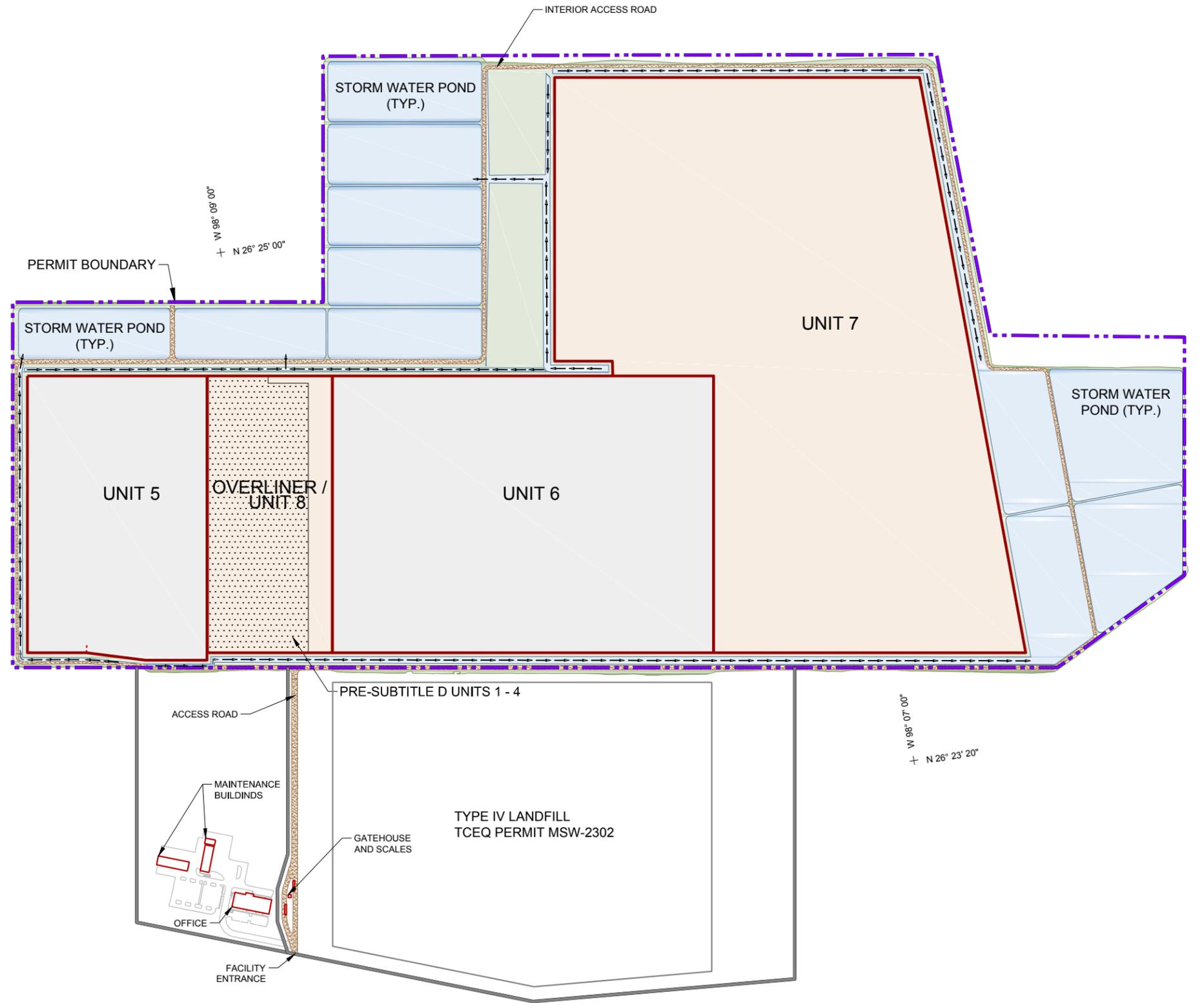
During construction of the alternative liner, groundwater will be controlled by installing an active dewatering system, which includes an underdrain composed of toe drains, a geocomposite along the sideslopes, and

an underdrain sump where removed groundwater will be pumped into adjacent drainage perimeter channel. Appendix III3E-2, Dewatering System Calculations estimates groundwater flow into the underdrain using SEEP/W, a 2-dimensional finite element analysis program, using the worst-case scenario and designs the underdrain system to reduce upward or inward hydrostatic forces on the alternative liner to achieve factor of safety greater than 1.2 against uplift. Figures III3-6A, III3-6B, and III3-8 present design layout and details of the dewatering system.

## **6.0 LINER QUALITY CONTROL PLAN**

### 30 TAC §330.339(a)

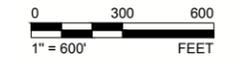
Appendix III3F, Liner Quality Control Plan (LQCP), is prepared under the direction of a licensed professional engineer by a Professional Engineer, and it shall be the basis for the type and rate of quality control testing performance and reported in the geosynthetic liner evaluation report (GLER) as required in §30 TAC §330.341. The plan provides operating personnel adequate procedural guidance for assuring continuous compliance with groundwater protection requirements. The plan specifies construction methods employing good engineering practices for installation and testing of components of the alternative liner including geosynthetic clay liner (GCL), geomembrane (GM), leachate collection and removal system (LCRS), and protective cover soil. As discussed in §3.1, the alternative liner design does not include at least a 2-foot layer of re-compacted soil with a hydraulic conductivity of no more than  $1 \times 10^{-7}$  cm/s; therefore, liner quality control testing procedures for a compacted clay liner are not provided within the LQCP in accordance with 30 TAC §330.339. Also included within the LQCP are special considerations for excavations below the seasonal high groundwater table.



- LEGEND**
- PERMIT BOUNDARY
  - UNIT BOUNDARY
  - EXISTING PRE-SUBTITLE D UNITS 1 - 4
  - ROADS
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

- NOTE(S)**
1. ACCESS ROADS FROM THE GATEHOUSE AND SCALES AT FACILITY ENTRANCE TO THE UNLOADING AREAS AND OTHER INTERIOR ACCESS ROADS ARE CHARACTERISTICALLY SURFACED WITH THE CALICHE.
  2. INTERIOR ACCESS ROAD WILL BE EITHER SOIL SURFACED OR SURFACED WITH CALICHE.
  3. OTHER ALL-WEATHER ROAD BUILDING MATERIALS SUCH AS COMPACTED GRAVEL, CRUSHED STONE, ASPHALT, OR CONCRETE MAY BE USED BY THE FACILITY.
  4. ALL-WEATHER ROADS WILL BE CONSTRUCTED FOR ACCESS TO UNLOADING AREAS DESIGNATED FOR WET-WEATHER OPERATIONS.

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1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	MX	JBF
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GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

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CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

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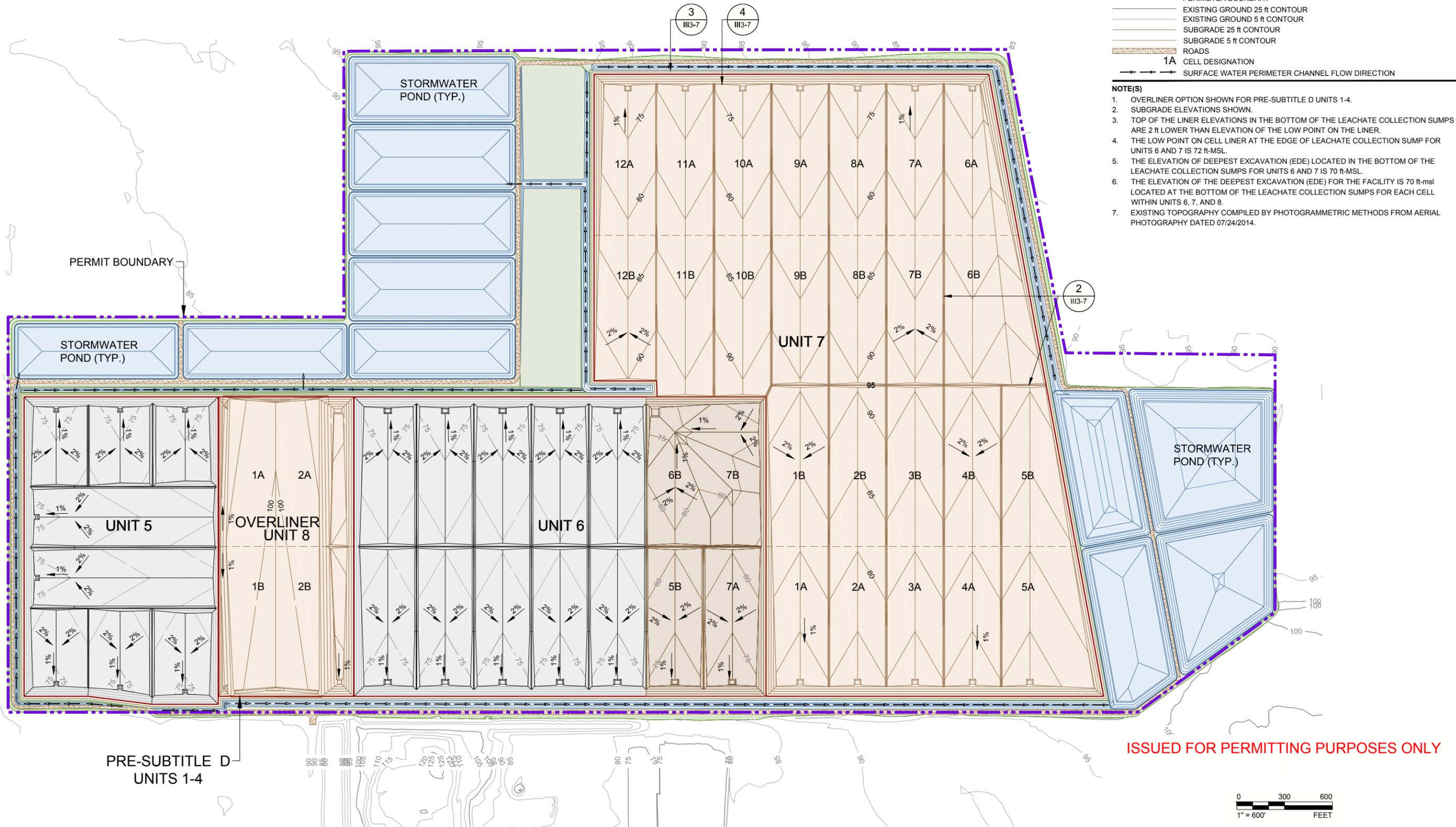
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**FACILITY LAYOUT PLAN**

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PROJECT NO. 1401491	APPLICATION SECTION III3	REV. 1	1 of 19	FIGURE III3-1
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



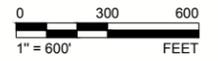
**LEGEND**

- PERIMETER BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- ROADS
- 1A CELL DESIGNATION
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

**NOTE(S)**

1. OVERLINER OPTION SHOWN FOR PRE-SUBTITLE D UNITS 1-4.
2. SUBGRADE ELEVATIONS SHOWN.
3. TOP OF THE LINER ELEVATIONS IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS ARE 2 ft LOWER THAN ELEVATION OF THE LOW POINT ON THE LINER.
4. THE LOW POINT ON CELL LINER AT THE EDGE OF LEACHATE COLLECTION SUMP FOR UNITS 6 AND 7 IS 72 ft-MSL.
5. THE ELEVATION OF DEEPEST EXCAVATION (EDE) LOCATED IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS FOR UNITS 6 AND 7 IS 70 ft-MSL.
6. THE ELEVATION OF THE DEEPEST EXCAVATION (EDE) FOR THE FACILITY IS 70 ft-MSL LOCATED AT THE BOTTOM OF THE LEACHATE COLLECTION SUMPS FOR EACH CELL WITHIN UNITS 6, 7, AND 8.
7. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.

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1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	MX	JBF
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SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
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CONSULTANT

Golder  
Associates

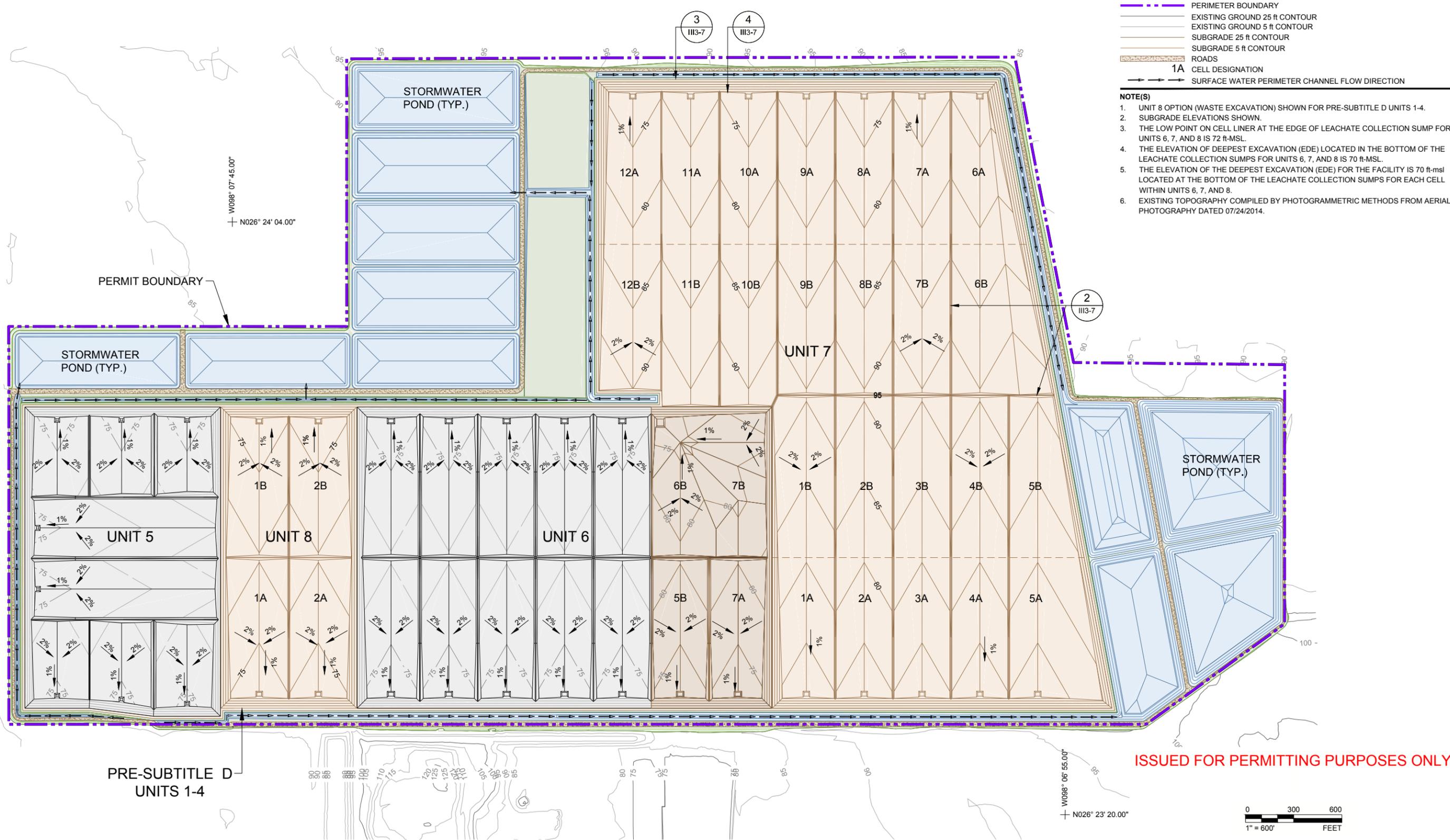
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500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**SUBGRADE LAYOUT PLAN  
OVERLINER OPTION**

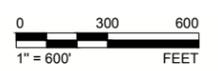
PROJECT NO. 1401491	APPLICATION SECTION III3	REV. 1	2 of 19	FIGURE III3-2A
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- LEGEND**
- PERIMETER BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - ROADS
  - 1A CELL DESIGNATION
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- NOTE(S)**
1. UNIT 8 OPTION (WASTE EXCAVATION) SHOWN FOR PRE-SUBTITLE D UNITS 1-4.
  2. SUBGRADE ELEVATIONS SHOWN.
  3. THE LOW POINT ON CELL LINER AT THE EDGE OF LEACHATE COLLECTION SUMP FOR UNITS 6, 7, AND 8 IS 72 ft-MSL.
  4. THE ELEVATION OF DEEPEST EXCAVATION (EDE) LOCATED IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS FOR UNITS 6, 7, AND 8 IS 70 ft-MSL.
  5. THE ELEVATION OF THE DEEPEST EXCAVATION (EDE) FOR THE FACILITY IS 70 ft-msl LOCATED AT THE BOTTOM OF THE LEACHATE COLLECTION SUMPS FOR EACH CELL WITHIN UNITS 6, 7, AND 8.
  6. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.

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SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

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EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**SUBGRADE LAYOUT PLAN**  
**UNIT 8 OPTION**

PROJECT NO.	APPLICATION SECTION	REV.	3 of 19	FIGURE
1401491	III3	1		III3-2B

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

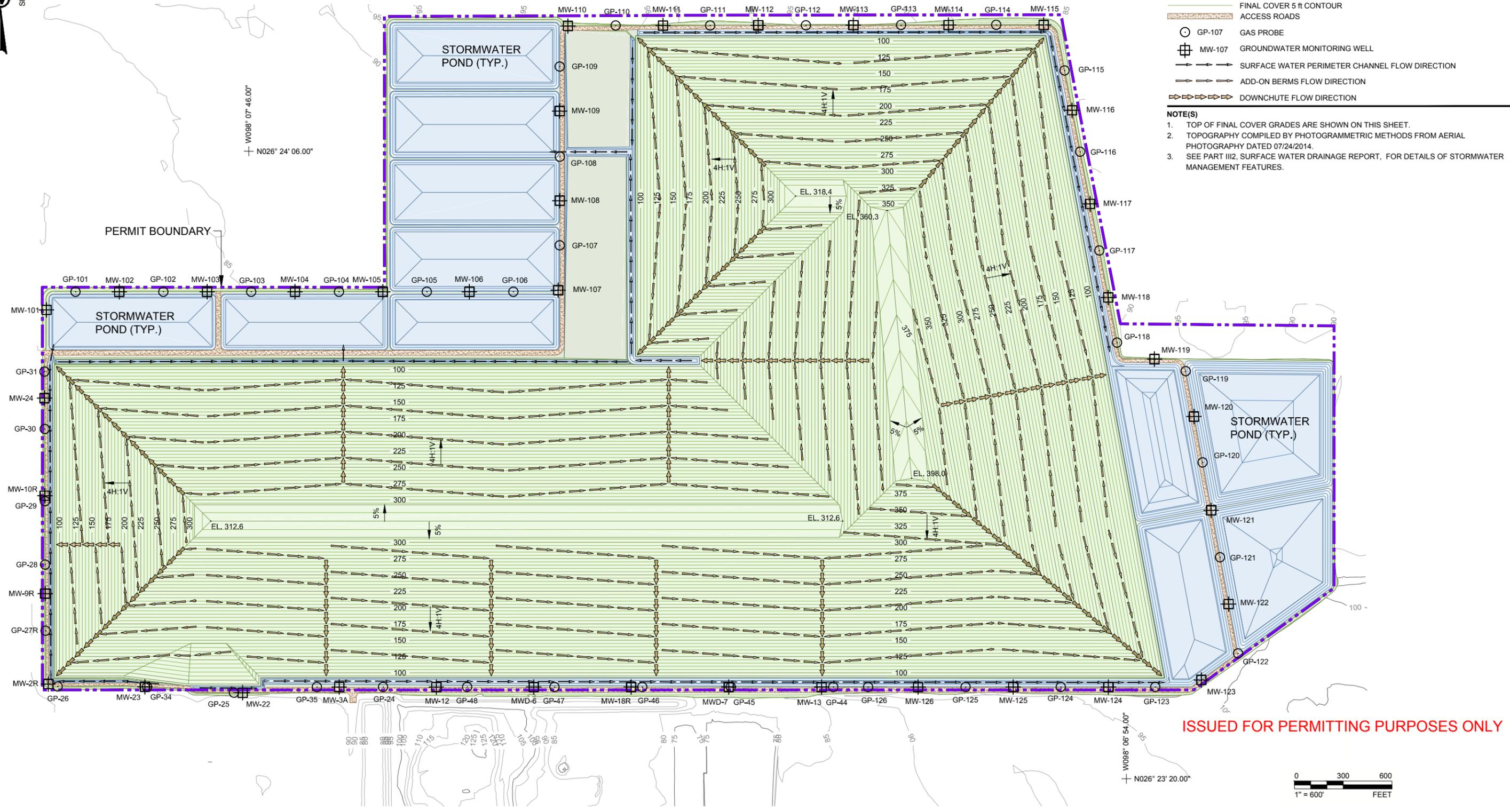


**LEGEND**

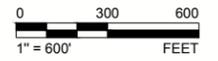
- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- GP-107 GAS PROBE
- MW-107 GROUNDWATER MONITORING WELL
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERMS FLOW DIRECTION
- DOWNCHUTE FLOW DIRECTION

**NOTE(S)**

1. TOP OF FINAL COVER GRADES ARE SHOWN ON THIS SHEET.
2. TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. SEE PART III2, SURFACE WATER DRAINAGE REPORT, FOR DETAILS OF STORMWATER MANAGEMENT FEATURES.



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JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
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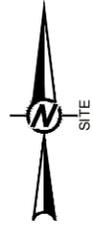
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TITLE

**FINAL CONTOUR MAP**

PROJECT NO.	APPLICATION SECTION	REV.	4 of 19	FIGURE
1401491	III3	1		III3-3

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

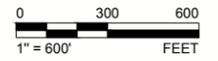


- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - FINAL COVER 25 ft CONTOUR
  - FINAL COVER 5 ft CONTOUR
  - ACCESS ROADS
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - ADD-ON BERMS FLOW DIRECTION
  - WATER DOWNCHUTE FLOW DIRECTION
  - BORINGS FROM PVIOUS SUBSURFACE INVESTIGATIONS
  - BORINGS FROM 2015 SUBSURFACE INVESTIGATIONS
  - MW - 23 GROUNDWATER MONITORING WELL
  - GP - 24 GAS PROBE

- NOTE(S)**
1. TOP OF FINAL COVER GRADES SHOWN.
  2. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/14.
  3. EXISTING GROUNDWATER MONITORING WELLS AND GAS PROBES (AS OF OCTOBER 2016) ARE SHOWN ON THIS DRAWING.



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	JBF	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

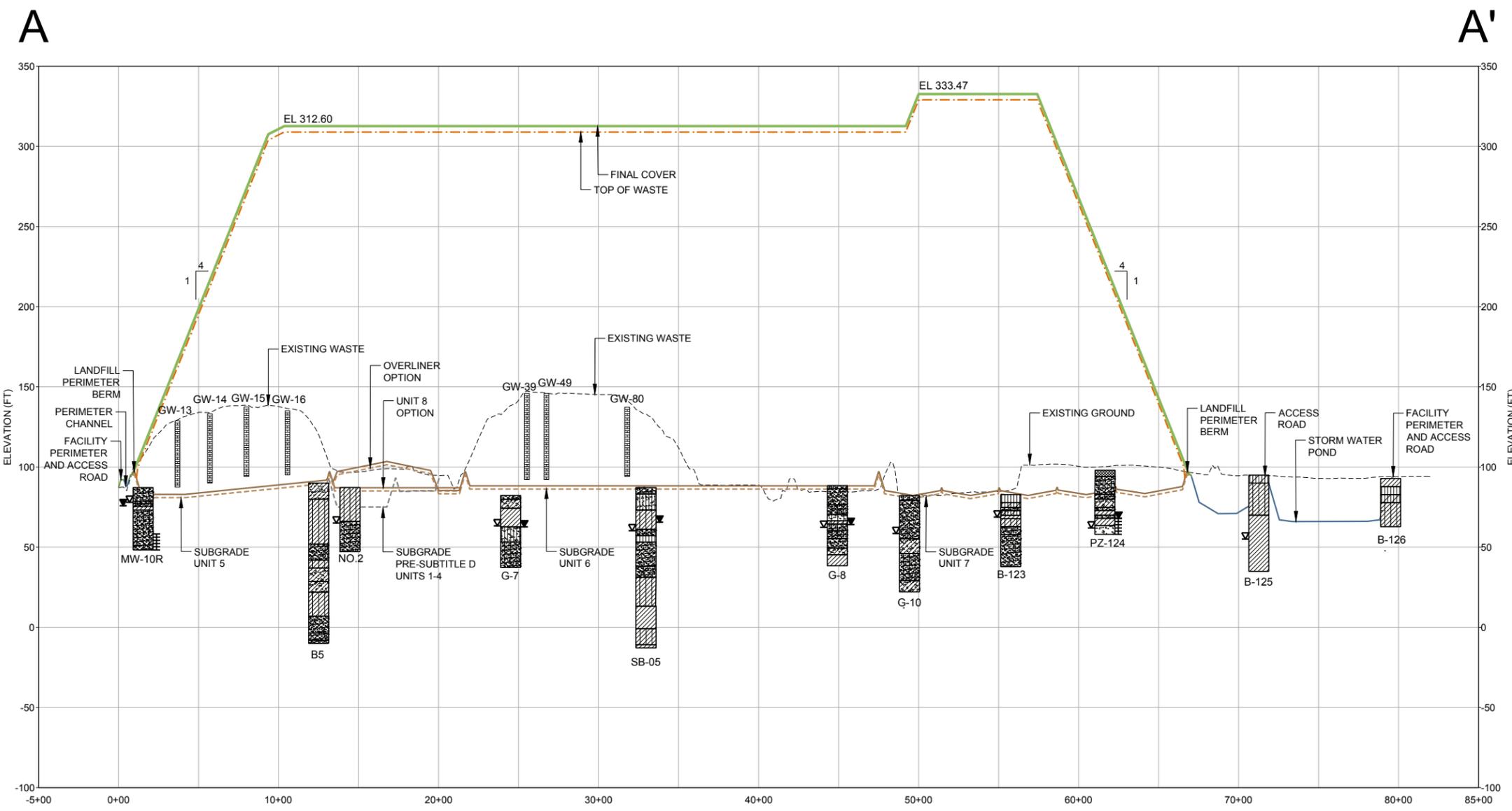
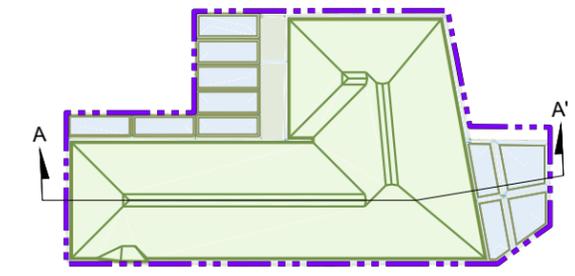
TITLE

**FILL CROSS-SECTIONS LOCATION MAP**

PROJECT NO. 1401491      APPLICATION SECTION III3      REV. 1      5 of 19      FIGURE III3-4A

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

KEY MAP



LEGEND

- FINAL COVER
  - - - TOP OF WASTE
  - - - EXISTING GRADE
  - - - SUBGRADE
  - - - EXISTING SUBGRADE
  - - - STORM WATER POND AND DITCH
- 
- [Pattern] SILT
  - [Pattern] SAND
  - [Pattern] CLAY
  - [Pattern] SILTY SAND
  - [Pattern] SILTY CLAY
  - [Pattern] SANDY SILT
  - [Pattern] SANDY CLAY
  - [Pattern] CLAYEY SAND
  - [Pattern] CLAYEY SILT
  - [Pattern] SANDY SILTY CLAY
  - [Pattern] SILTY CLAYEY SAND
- 
- ▼ STATIC WATER LEVEL
  - ▽ INITIAL WATER LEVEL
  - [Pattern] SCREENED INTERVAL

NOTE(S)

1. GAS WELL DATA BASED ON INFORMATION FROM DESIGN AND AS BUILT DRAWINGS.
2. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. THERE ARE NO INITIAL WATER LEVEL DATA FOR THE BORINGS SHOWN ON THIS CROSS-SECTION. THE INITIAL WATER LEVEL IS THAT LEVEL AT THE TIME OF DRILLING AS REPORTED ON THE BORING LOG. THE STATIC WATER LEVEL IS THAT LEVEL SOMETIME AFTER DRILLING AS REPORTED ON THE BORING LOG.
4. THE SIDESLOPES SHOWN ARE NOMINAL; THE ACTUAL SIDESLOPES ON THESE CROSS-SECTIONS WILL VARY DUE TO THE ANGULAR PROJECTION OF THE SECTIONS.
5. GAS WELL LOCATIONS ARE SHOWN ON III6, LANDFILL GAS MANAGEMENT PLAN, FIGURE III6-3
6. MONITORING WELL LOCATIONS ARE SHOWN ON III3, FILL CROSS-SECTION LOCATION MAP, FIGURE III3-4A.
7. SECTION SHOWN FOR UNIT 8 OPTION IS THROUGH THE INTERCELL BERM.

SCALE 1" = 800'  
 VERT. SCALE 1" = 80'  
**A** FILL CROSS-SECTION A  
 III3-4B

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	JBF	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

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 TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
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---

CONSULTANT

Golder Associates

HOUSTON OFFICE  
 500 CENTURY PLAZA DRIVE, SUITE 190  
 HOUSTON, TEXAS  
 USA  
 [+1] (281) 821-6868  
 www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

---

TITLE

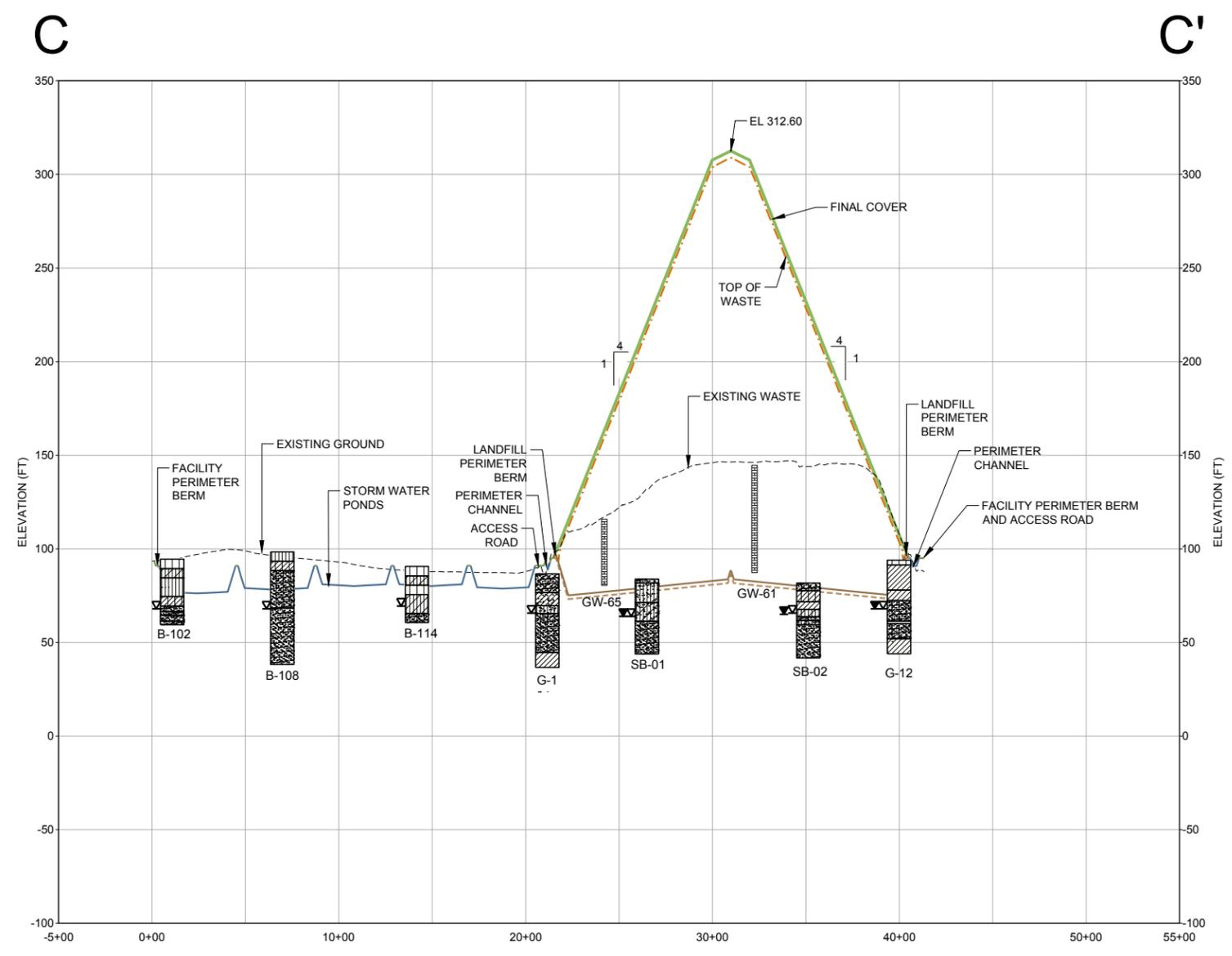
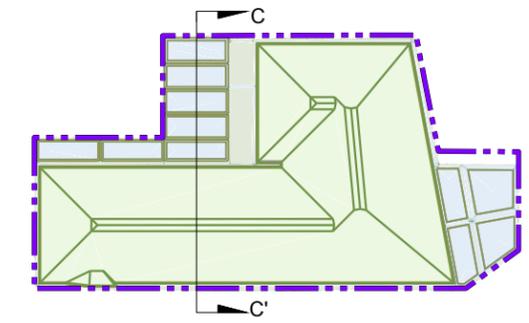
**FILL CROSS-SECTION A**

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PROJECT NO.	APPLICATION SECTION	REV.	6 of 19	FIGURE
1401491	III3	1		<b>III3-4B</b>

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

KEY MAP



LEGEND

- FINAL COVER
  - - - TOP OF WASTE
  - - - EXISTING GRADE
  - - - SUBGRADE
  - STORM WATER POND AND DITCH
- |  |            |  |                   |
|--|------------|--|-------------------|
|  | SILT       |  | SANDY CLAY        |
|  | SAND       |  | CLAYEY SAND       |
|  | CLAY       |  | CLAYEY SILT       |
|  | SILTY SAND |  | SANDY SILTY CLAY  |
|  | SILTY CLAY |  | SILTY CLAYEY SAND |
|  | SANDY SILT |  |                   |
- ▽ STATIC WATER LEVEL
  - ▽ INITIAL WATER LEVEL
  - ▬ SCREENED INTERVAL

NOTE(S)

1. GAS WELL DATA BASED ON INFORMATION FROM DESIGN AND AS BUILT DRAWINGS.
2. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. THERE ARE NO INITIAL WATER LEVEL DATA FOR THE BORINGS SHOWN ON THIS CROSS-SECTION. THE INITIAL WATER LEVEL IS THAT LEVEL AT THE TIME OF DRILLING AS REPORTED ON THE BORING LOG. THE STATIC WATER LEVEL IS THAT LEVEL SOMETIME AFTER DRILLING AS REPORTED ON THE BORING LOG.
4. THE SIDESLOPES SHOWN ARE NOMINAL; THE ACTUAL SIDESLOPES ON THESE CROSS-SECTIONS WILL VARY DUE TO THE ANGULAR PROJECTION OF THE SECTIONS.
5. GAS WELL LOCATIONS ARE SHOWN ON III6, LANDFILL GAS MANAGEMENT PLAN, FIGURE III6-3
6. MONITORING WELL LOCATIONS ARE SHOWN ON III3, FILL CROSS-SECTION LOCATION, FIGURE III3-4A.

SCALE 1" = 800'  
VERT. SCALE 1" = 80'  
**C** FILL CROSS-SECTION C  
III3-4D

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	JBF	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

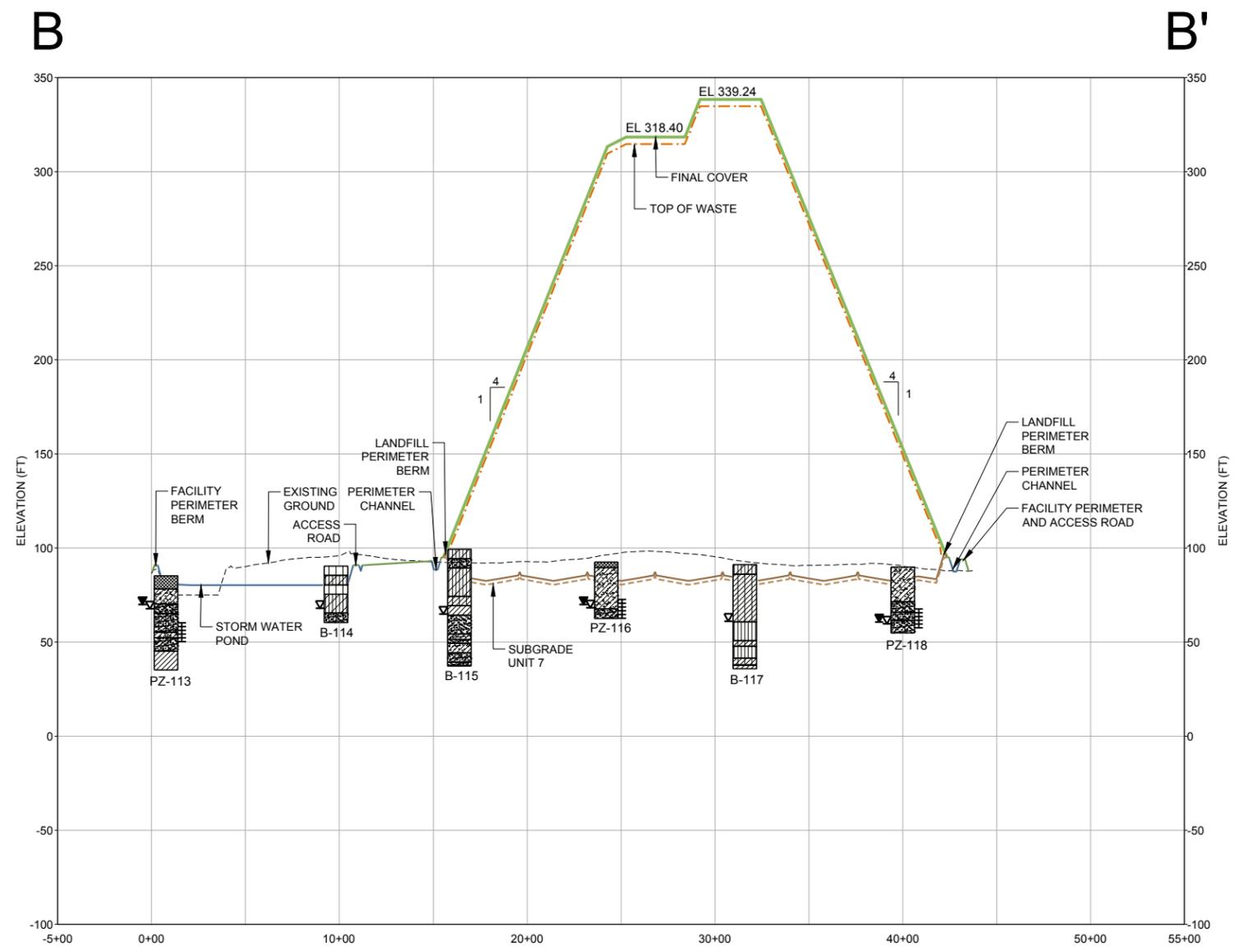
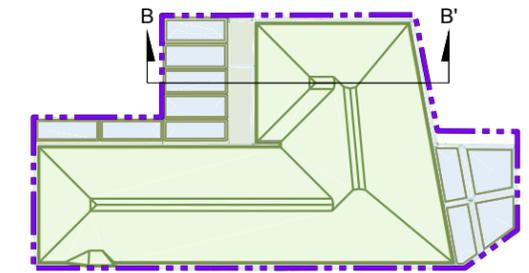
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**FILL CROSS SECTION C**

PROJECT NO.	APPLICATION SECTION	REV.	8 of 19	FIGURE
1401491	III3	1		III3-4D

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



LEGEND

- FINAL COVER
  - TOP OF WASTE
  - EXISTING GRADE
  - SUBGRADE
  - STORM WATER POND AND DITCH
- 
- SILT
  - SAND
  - CLAY
  - SILTY SAND
  - SILTY CLAY
  - SANDY SILT
  - STATIC WATER LEVEL
  - INITIAL WATER LEVEL
  - SCREENED INTERVAL
- 
- SANDY CLAY
  - CLAYEY SAND
  - CLAYEY SILT
  - SANDY SILTY CLAY
  - SILTY CLAYEY SAND

NOTE(S)

1. GAS WELL DATA BASED ON INFORMATION FROM DESIGN AND AS BUILT DRAWINGS.
2. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. THERE ARE NO INITIAL WATER LEVEL DATA FOR THE BORINGS SHOWN ON THIS CROSS-SECTION. THE INITIAL WATER LEVEL IS THAT LEVEL AT THE TIME OF DRILLING AS REPORTED ON THE BORING LOG. THE STATIC WATER LEVEL IS THAT LEVEL SOMETIME AFTER DRILLING AS REPORTED ON THE BORING LOG.
4. THE SIDESLOPES SHOWN ARE NOMINAL; THE ACTUAL SIDESLOPES ON THESE CROSS-SECTIONS WILL VARY DUE TO THE ANGULAR PROJECTION OF THE SECTIONS.
5. GAS WELL LOCATIONS ARE SHOWN ON III6, LANDFILL GAS MANAGEMENT PLAN, FIGURE III6-3
6. MONITORING WELL LOCATIONS ARE SHOWN ON III3, FILL CROSS-SECTION LOCATION MAP, FIGURE III3-4A.

SCALE 1" = 800'  
 VERT. SCALE 1" = 80'  
**B** FILL CROSS-SECTION B  
 III3-4C

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	JBF	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

JEFFREY B. FASSETT  
 85675  
 LICENSED PROFESSIONAL ENGINEER  
 STATE OF TEXAS

GOLDER ASSOCIATES INC.  
 TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
 SOLID WASTE MANAGEMENT

CONSULTANT

Golder Associates

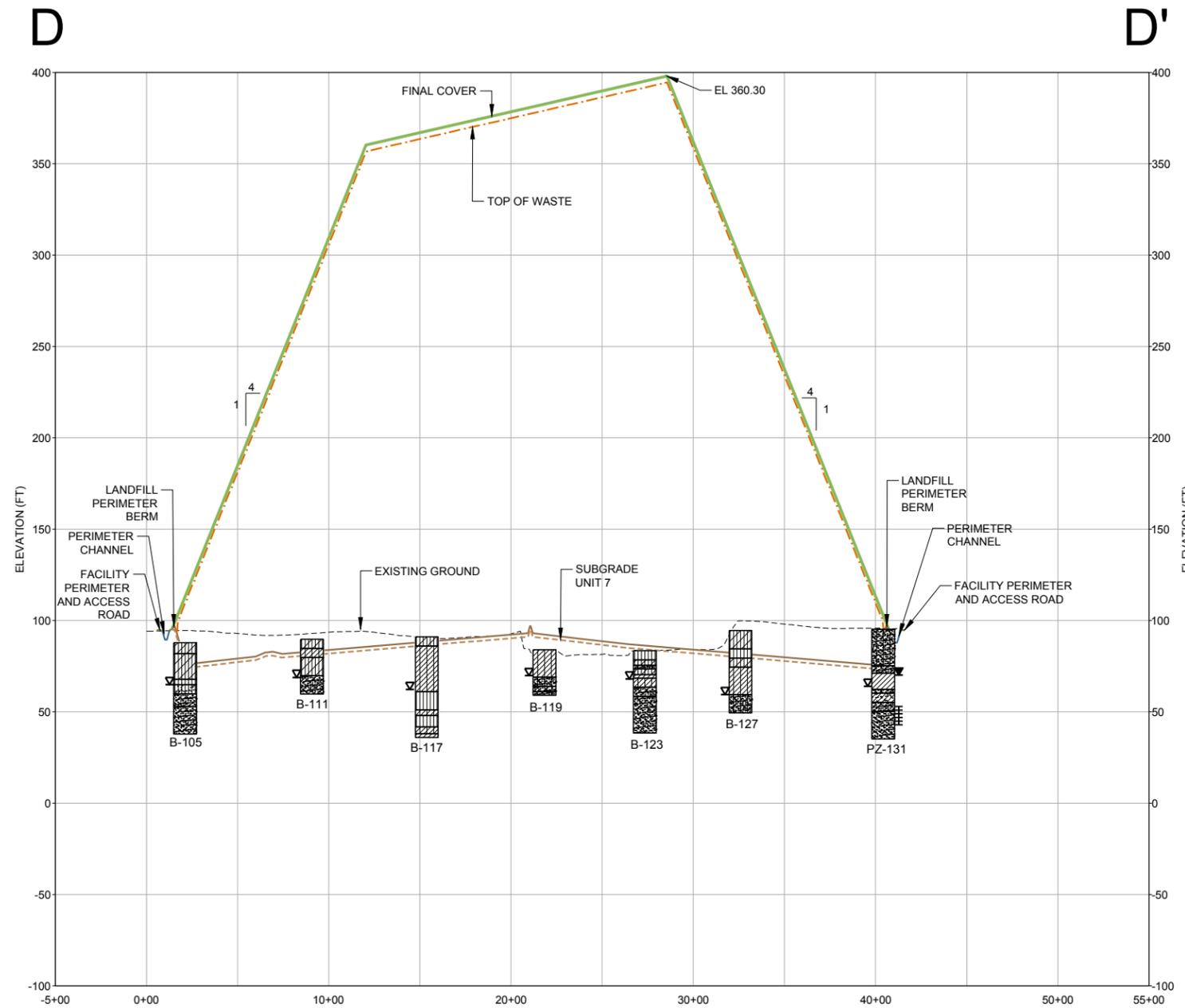
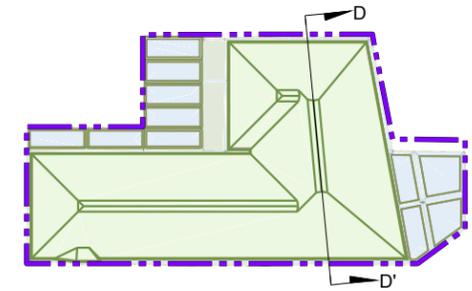
HOUSTON OFFICE  
 500 CENTURY PLAZA DRIVE, SUITE 190  
 HOUSTON, TEXAS  
 USA  
 [+1] (281) 821-6868  
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PROJECT  
 EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FILL CROSS-SECTION B**

PROJECT NO. 1401491      APPLICATION SECTION III3      REV. 1      7 of 19      FIGURE III3-4C

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



LEGEND

- FINAL COVER
  - - - TOP OF WASTE
  - - - EXISTING GRADE
  - - - SUBGRADE
  - STORM WATER POND AND DITCH
- |  |            |  |                   |
|--|------------|--|-------------------|
|  | SILT       |  | SANDY CLAY        |
|  | SAND       |  | CLAYEY SAND       |
|  | CLAY       |  | CLAYEY SILT       |
|  | SILTY SAND |  | SANDY SILTY CLAY  |
|  | SILTY CLAY |  | SILTY CLAYEY SAND |
|  | SANDY SILT |  |                   |
- ▼ STATIC WATER LEVEL
  - ▽ INITIAL WATER LEVEL
  - ▬ SCREENED INTERVAL

NOTE(S)

1. GAS WELL DATA BASED ON INFORMATION FROM DESIGN AND AS BUILT DRAWINGS.
2. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. THERE ARE NO INITIAL WATER LEVEL DATA FOR THE BORINGS SHOWN ON THIS CROSS-SECTION. THE INITIAL WATER LEVEL IS THAT LEVEL AT THE TIME OF DRILLING AS REPORTED ON THE BORING LOG. THE STATIC WATER LEVEL IS THAT LEVEL SOMETIME AFTER DRILLING AS REPORTED ON THE BORING LOG.
4. THE SIDESLOPES SHOWN ARE NOMINAL; THE ACTUAL SIDESLOPES ON THESE CROSS-SECTIONS WILL VARY DUE TO THE ANGULAR PROJECTION OF THE SECTIONS.
5. GAS WELL LOCATIONS ARE SHOWN ON III6, LANDFILL GAS MANAGEMENT PLAN, FIGURE III6-3
6. MONITORING WELL LOCATIONS ARE SHOWN ON III3, FILL CROSS-SECTION MAP, FIGURE III3-4A.

SCALE 1" = 800'  
VERT. SCALE 1" = 80'

**D** FILL CROSS-SECTION D  
III3-4E

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	JBF	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

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MANAGEMENT

CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**FILL CROSS-SECTION D**

PROJECT NO.	APPLICATION SECTION	REV.	9 of 19	FIGURE
1401491	III3	1		III3-4E

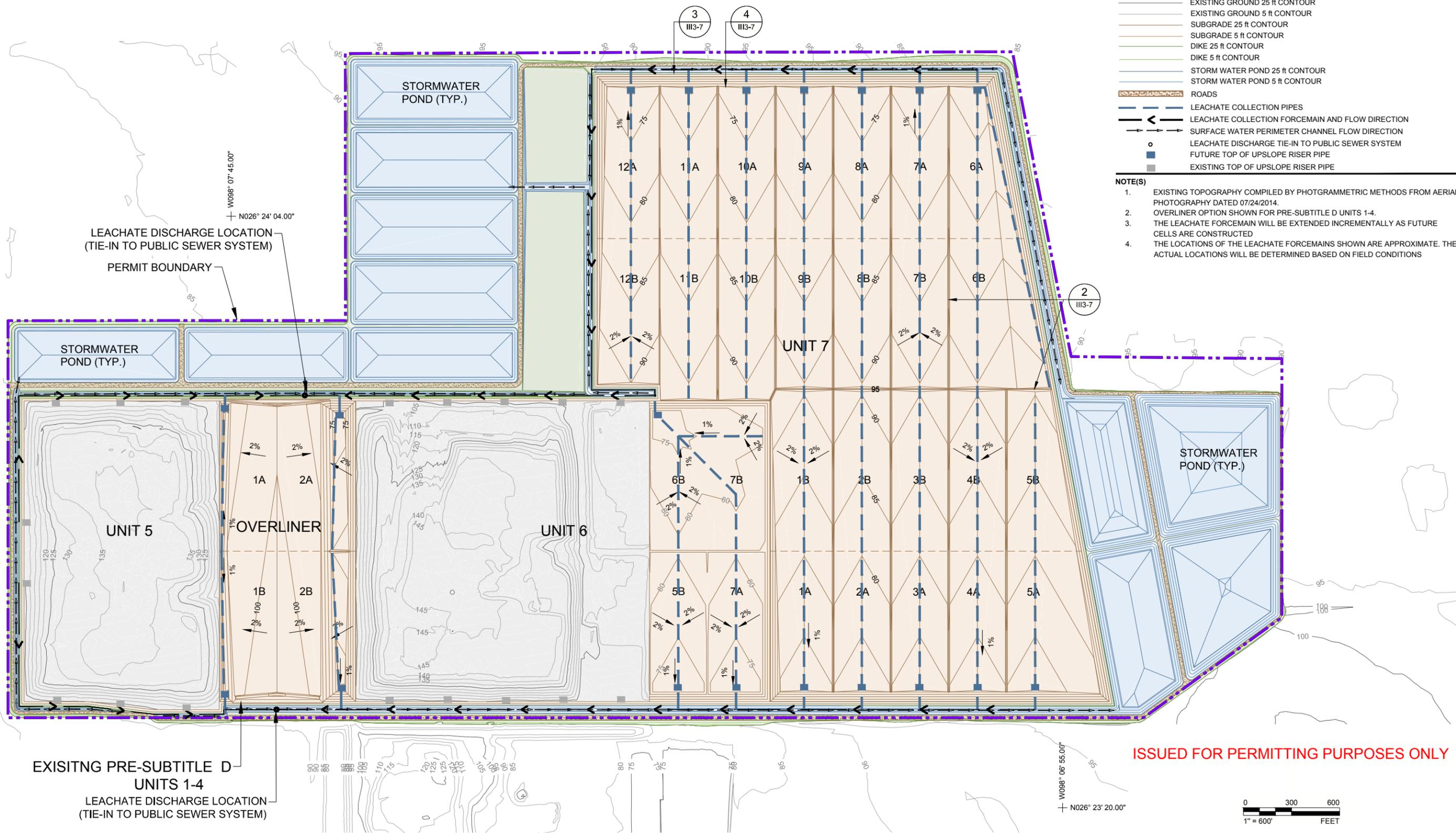
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



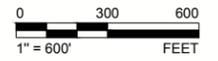
**LEGEND**

- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- DIKE 25 ft CONTOUR
- DIKE 5 ft CONTOUR
- STORM WATER POND 25 ft CONTOUR
- STORM WATER POND 5 ft CONTOUR
- ROADS
- LEACHATE COLLECTION PIPES
- LEACHATE COLLECTION FORCEMAIN AND FLOW DIRECTION
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- LEACHATE DISCHARGE TIE-IN TO PUBLIC SEWER SYSTEM
- FUTURE TOP OF UPSLOPE RISER PIPE
- EXISTING TOP OF UPSLOPE RISER PIPE

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. OVERLINER OPTION SHOWN FOR PRE-SUBTITLE D UNITS 1-4.
  3. THE LEACHATE FORCEMAIN WILL BE EXTENDED INCREMENTALLY AS FUTURE CELLS ARE CONSTRUCTED
  4. THE LOCATIONS OF THE LEACHATE FORCEMAINS SHOWN ARE APPROXIMATE. THE ACTUAL LOCATIONS WILL BE DETERMINED BASED ON FIELD CONDITIONS



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0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF
REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED

SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**LEACHATE COLLECTION SYSTEM DISCHARGE PLAN**  
OVERLINER OPTION

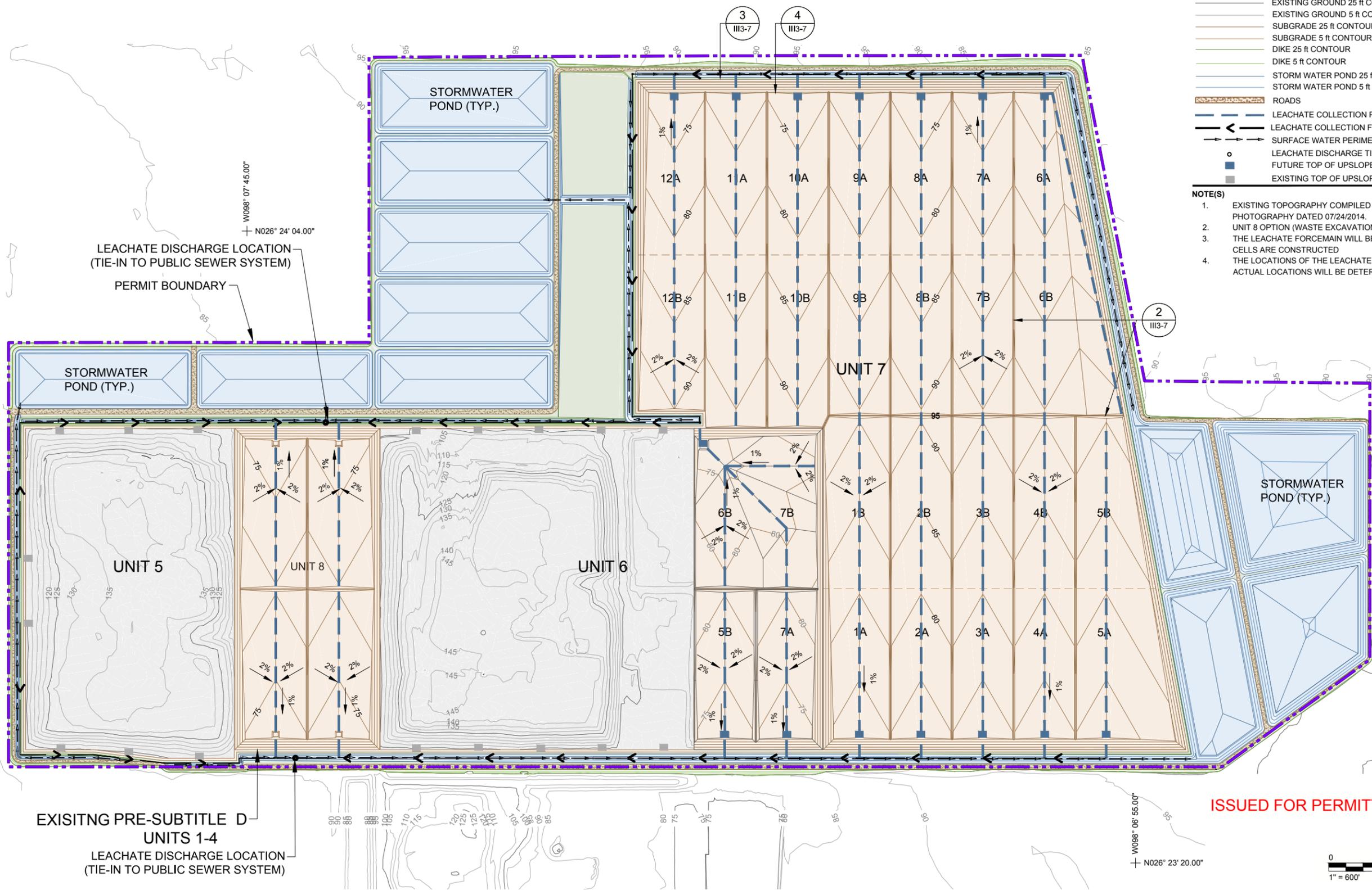
PROJECT NO. 1401491	APPLICATION SECTION III3	REV. 1	10 of 19	FIGURE III3-5A
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

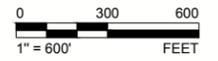


- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - DIKE 25 ft CONTOUR
  - DIKE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ROADS
  - LEACHATE COLLECTION PIPES
  - LEACHATE COLLECTION FORCEMAIN AND FLOW DIRECTION
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - LEACHATE DISCHARGE TIE-IN TO PUBLIC SEWER SYSTEM
  - FUTURE TOP OF UPSLOPE RISER PIPE
  - EXISTING TOP OF UPSLOPE RISER PIPE

- NOTE(S)**
1. EXISTING TOPOGRAPHY COMPILED BY PHOTGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
  2. UNIT 8 OPTION (WASTE EXCAVATION) SHOWN FOR PRE-SUBTITLE D UNITS 1-4
  3. THE LEACHATE FORCEMAIN WILL BE EXTENDED INCREMENTALLY AS FUTURE CELLS ARE CONSTRUCTED
  4. THE LOCATIONS OF THE LEACHATE FORCEMAINS SHOWN ARE APPROXIMATE. THE ACTUAL LOCATIONS WILL BE DETERMINED BASED ON FIELD CONDITIONS



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF
REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED

SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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HOUSTON OFFICE  
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HOUSTON, TEXAS  
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**LEACHATE COLLECTION SYSTEM DISCHARGE PLAN**  
UNIT 8 OPTION

PROJECT NO. 1401491      APPLICATION SECTION III3      REV. 1      11 of 19      FIGURE III3-5B

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



**LEGEND**

- PERMIT BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- DIKE 25 ft CONTOUR
- DIKE 5 ft CONTOUR
- STORM WATER POND 25 ft CONTOUR
- STORM WATER POND 5 ft CONTOUR
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ROADS
- TOE DRAIN UNDERDRAIN (SEE FIGURE III3F-5 FOR DETAILS)
- DEWATERING SUMP
- CELL DESIGNATION

**NOTE(S)**

1. OVERLINER OPTION SHOWN FOR PRE-SUBTITLE D UNITS 1-4
2. SUBGRADE ELEVATIONS SHOWN
3. TOP OF THE LINER ELEVATIONS IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS ARE 2 ft LOWER THAN ELEVATION OF THE LOW POINT ON THE LINER.
4. EXISTING TOPOGRAPHY COMPILED BY PHTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	AA	AA	MX	JBF
REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED

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TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

Golder  
Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**UNDERDRAIN SYSTEM LAYOUT  
OVERLINER OPTION**

PROJECT NO. 1401491	APPLICATION SECTION III3	REV. 1	12 of 19	FIGURE <b>III3-6A</b>
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



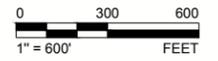
- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - DIKE 25 ft CONTOUR
  - DIKE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - ROADS
  - TOE DRAIN UNDERDRAIN (SEE FIGURE III3-5 FOR DETAILS)
  - DEWATERING SUMP
  - CELL DESIGNATION

- NOTE(S)**
1. UNIT 8 OPTION (WASTE EXCAVATION) SHOWN FOR PRE-SUBTITLE D UNITS 1-4
  2. SUBGRADE ELEVATIONS SHOWN
  3. TOP OF THE LINER ELEVATIONS IN THE BOTTOM OF THE LEACHATE COLLECTION SUMPS ARE 2 ft LOWER THAN ELEVATION OF THE LOW POINT ON THE LINER.
  4. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.



PRE-SUBTITLE D  
UNITS 1-4

ISSUED FOR PERMITTING PURPOSES ONLY



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	AA	AA	MX	JBF
REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED

SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

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EDINBURG, HIDALGO COUNTY, TEXAS

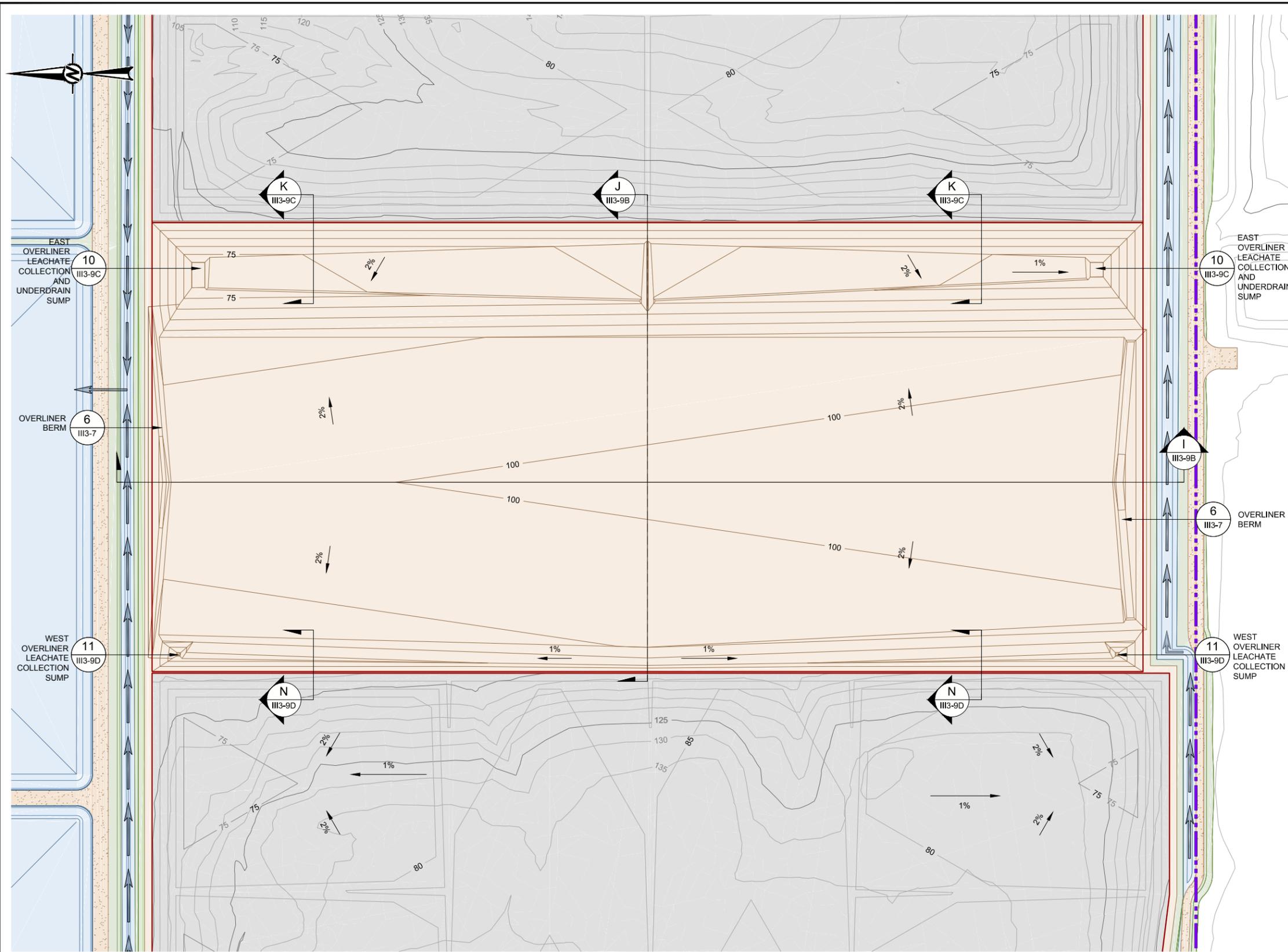
TITLE

**UNDERDRAIN SYSTEM LAYOUT**  
UNIT 8 OPTION

PROJECT NO. 1401491      APPLICATION SECTION III3      REV. 1      13 of 19      FIGURE III3-6B

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



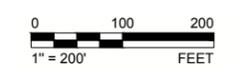


**LEGEND**

- PERIMETER BOUNDARY
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- SUBGRADE 25 ft CONTOUR
- SUBGRADE 5 ft CONTOUR
- ROADS
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

- NOTE(S)**
1. OVERLINER OPTION SHOWN FOR PRE-SUBTITLE D UNITS 1-4.
  2. SUBGRADE ELEVATIONS SHOWN.
  3. THE ELEVATION OF DEEPEST EXCAVATION (EDE) FOR OVERLINER EAST AT THE BOTTOM OF SUMP IS 70 ft-msl AND THE (EDE) OVERLINER WEST AT THE BOTTOM OF SUMP IS 79.50 ft-msl.

**ISSUED FOR PERMITTING PURPOSES ONLY**



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOD	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**OVERLINER SUBGRADE LAYOUT PLAN**

PROJECT NO. 1401491      APPLICATION SECTION III3      REV. 1      16 of 19      FIGURE III3-9A

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

**APPENDIX III3A-1  
VOLUME CALCULATIONS**

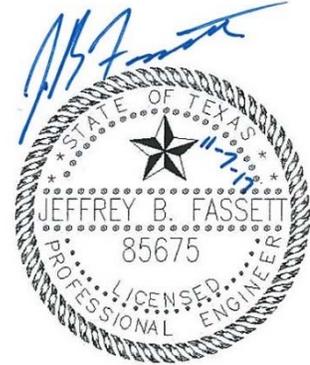
## VOLUME CALCULATIONS

Made by: JCW  
Checked by: CEI  
Reviewed by: JBF

### 1.0 SUMMARY

The table below summarizes total disposal capacity (i.e. airspace) for each cover option for the landfill expansion.

Total Airspace (CY)		Construction Options	
		Overliner	Unit 8
Final Cover Options	Standard	84,997,400	84,831,321
	Alternative	85,981,680	85,815,599
	Closure Turf	87,301,156	87,135,076



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### 2.0 OBJECTIVE

To determine the airspace gained from the expansion of Edinburg Regional Disposal Facility for two options for the Pre-Subtitle D Units 1 through 4: construction of an overliner above existing Units 1 - 4, and relocation of existing Pre-Subtitle D waste and construction of Unit 8. In addition, three final cover options outlined in Part III7, Closure Plan are considered in the volume calculation.

### 3.0 GIVEN

Approved TCEQ Permit MSW-956B final cover grades and composite lining system grades, expansion design top of waste grades and top of composite lining system grades, and total airspace for approved TCEQ Permits MSW-956A and MSW-956B.

### 4.0 METHOD

Use AutoCAD Civil 3D, a civil engineering software, to compare the expansion top of waste grades to the top of permitted waste grades combined with expansion top of composite lining system grades.

## 5.0 CALCULATIONS

### 5.1 Previously Approved Airspace Capacities

Permit	Capacity (CY)	Description
956A	1,027,858	Pre-Subtitle D Units 1-4
956B	16,734,913	Addition of Units 5 and 6

### 5.2 Expansion Airspace Gained

To determine the expansion volume gained, two surface models are compared: bottom of waste surface developed by combining top of approved TCEQ Permit MSW-956B waste surfaces with expansion top of protective cover surface, and expansion top of waste surfaces.

### 5.2.1 Construction of Overliner option

Comparison of developed bottom of waste surface (combination of expansion protective cover grades including Overliner with TCEQ Permit MSW-956B waste grades) to expansion top of waste grades (developed from expansion final cover grades and thicknesses of the final cover options).

Final Cover	Thickness (ft)	Capacity (CY)
Standard	3.5	68,262,487
Alternative	2	69,246,767
Closure Turf	0	70,566,243

### 5.2.2 Relocation of Pre-Subtitle D waste and construction of Unit 8 option

Comparison of developed bottom of waste surface (combination of expansion protective cover grades including Unit 8 with TCEQ Permit MSW-956B waste grades) to expansion top of waste grades (developed from expansion final cover grades and thicknesses of the final cover options). Please note that airspace gained will be reduced by volume of relocated Pre-Subtitle D waste.

Final Cover	Thickness (ft)	Volume (CY)	Capacity (CY)
Standard	3.5	69,124,266	68,096,408
Alternative	2	70,108,544	69,080,686
Closure Turf	0	71,428,021	70,400,163

## 6.0 CONCLUSION

The total airspace capacity is the sum of TCEQ Permit MSW-956B and expansion airspace gained.

Total Airspace (CY)		Construction Options	
		Overliner	Unit 8
Final Cover Options	Standard	84,997,400	84,831,321
	Alternative	85,981,680	85,815,599
	Closure Turf	87,301,156	87,135,076

**APPENDIX III3A-2  
SITE LIFE CALCULATIONS**

## SITE LIFE CALCULATIONS

Made by: CEI  
 Checked by: MX  
 Reviewed by: JBF

### 1.0 SUMMARY

The site life is: 63.5 yrs or until Feb 2080

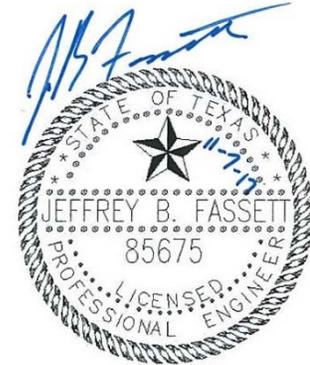
### 2.0 OBJECTIVE

To determine the anticipated site life based on airspace volume calculations, current disposal capacity (i.e. airspace) consumed, estimated waste receipts, and projected growth rates.

### 3.0 GIVEN

FY 2015 Annual Report MSW-956B	Date 8/31/2016
Current annual waste receipt	494,319 tons
Compacted waste density	1215 lbs/CY
Total Airspace	16,734,913 CY
Remaining Capacity	5,738,691 CY
Airspace Consumed	10,996,222 CY

Total Airspace		Construction Options	
		Overliner	Unit 8
Final Cover Options	Prescriptive	84,997,400	84,831,321
	Alternate	85,981,680	85,815,599
	Closure Turf	87,301,156	87,135,076



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### 4.0 ASSUMPTIONS

Growth Rate	1.75%
Compacted in-place waste density	1,500 lbs/CY

### 5.0 CALCULATIONS

The site life, number of years to consume total airspace, can be determined by solving the following equation:

$$A_T = \sum_n A_C(1+R)^n$$

where

$A_T$  = Total remaining airspace

$A_C$  = Initial annual airspace consumed

R = Growth Rate

$n$  = Site life in years

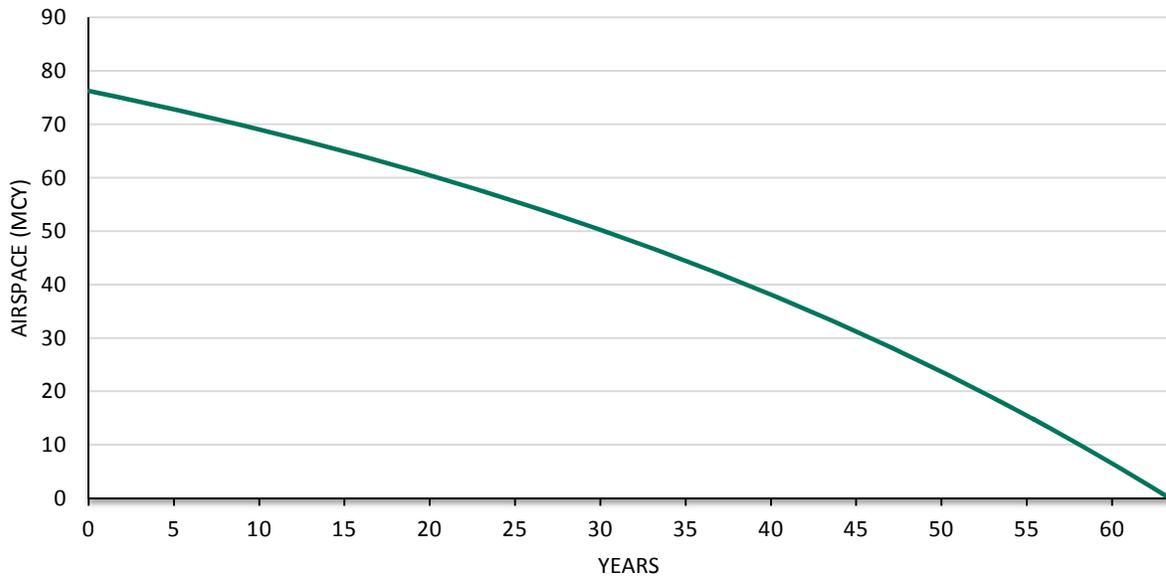
$A_T$  = 76,304,934 CY

$A_C$  = 659,092 CY/yr

R = 1.0175

$n$  = 63.5 years

### SITE LIFE



**APPENDIX III3B-2E-1**  
**FINAL COVER SYSTEM STABILITY**

## FINAL COVER SYSTEM STABILITY CALCULATION

Made by: JCW  
 Checked by: CEI  
 Reviewed by: JBF

### 1.0 OBJECTIVE

Evaluate the stability of the final cover liner system.

### 2.0 GIVEN

The maximum head over the geomembrane is less than the thickness of the geocomposite drainage layer as demonstrated in Appendix III3B-2E-2, Final Cover Drainage Layer Capacity.

Final cover slopes are 4H:1V with a maximum length of 1200 ft.

The failure mechanism will be sliding along one of the liner interfaces. The final cover system consists of (from top to bottom):

24-inch Soil Cover consisting of on-site soils OR  
 Double-sided Geocomposite Drainage Layer  
 40-mil LLDPE textured Geomembrane  
 Geosynthetic Clay Liner (GCL)

18-inch Soil Cover consisting of on-site soils  
 Double-sided Geocomposite Drainage Layer  
 40-mil LLDPE textured Geomembrane  
 18-inch Clay Liner

Based on a review of available data at low normal stresses, the following parameters were assigned to the materials.

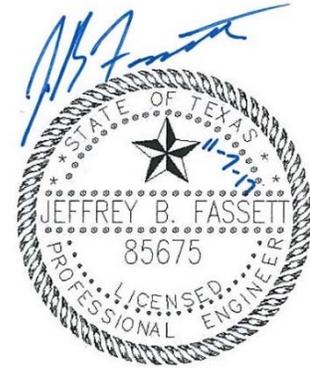
**Table III3B-2E-1: Final Cover Component Interface Unit Weight and Strength Parameters**

Soil	Unit Weight (pcf)		Strength Parameters		Reference
	Moist	Saturated	$\phi$ degrees	c (psf)	
Soil Cover	115	132	28	0	Estimate
Soil Cover / Geocomposite	–	–	28	0	Golder*
Geocomposite/Textured Geomembrane**	–	–	21	0	Golder*
Textured Geomembrane/GCL	–	–	24	0	Golder*
GCL/Clay Liner	–	–	35	0	Golder*

\* Based on unpublished data from tests performed in Golder's laboratory, on similar geosynthetic materials. Strength parameters were conservatively assigned to be equal to or a percentage of the peak strength (lower bound) to account for testing material variability (see pages 3 and 4).

\*\*The data indicates a lower-bound angle of 24°, but since the final cover pertains to a long-term condition a conservative angle of 21° is assumed for the calculation.

Based on the shear strength parameters, the critical interface occurs along the geocomposite/ textured geomembrane interface; this interface was assigned a conservative friction angle of 21 degrees.



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## 4.0 METHOD

Create a model representing the sideslope situation and use it in conjunction with limit equilibrium concepts to determine the minimum factor of safety against a sliding block failure along the critical interface.

### Infinite Slope Analysis

$$FS = \frac{c + (\gamma b \cos \beta - \gamma_w d \cos \beta) \tan \phi}{\gamma b \sin \beta}$$

### Sliding at Geocomposite-Textured Geomembrane Interface

$\phi =$	21	interface friction angle
$\beta =$	14.0	slope angle (degrees)
$c =$	0	adhesion (psf)
$\gamma =$	115	unit weight of soil (pcf)
$b =$	2.0	thickness (ft)
$d =$	0	water depth in cover (ft)
$\gamma_w =$	62.4	unit weight of water (pcf)
<b>FS =</b>	<b>1.54</b>	

Based on the Corps of Engineers "Design and Constuction of Levees" manual (EM 1110-2-1913) and the "EPA Guide to Technical Resources for the Design of Land Disposal Facilities", the recommended factor of safety is 1.5 for the veneer slope stability of the final cover.

## 5.0 RESULTS

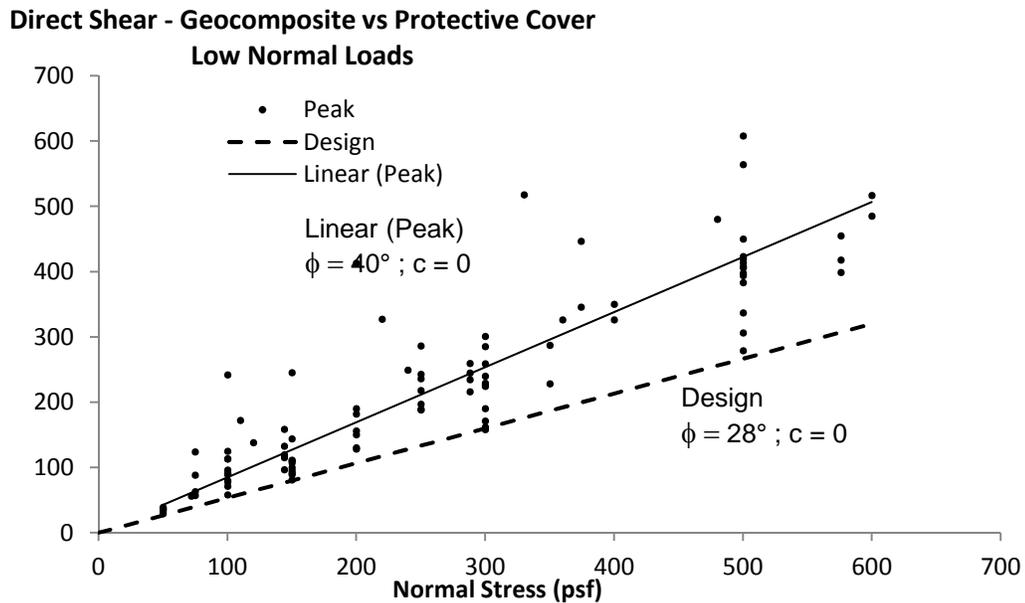
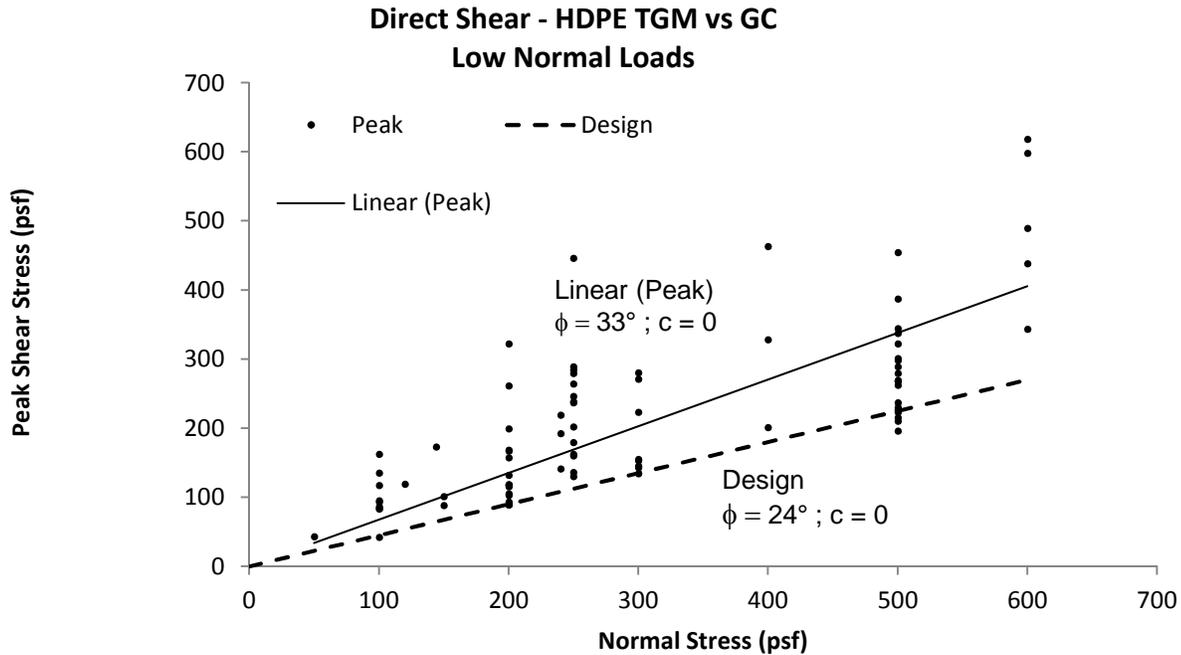
Using the Golder Associates interface friction angle database as a guide, the most critical internal friction angle of the final cover liner system was conservatively assumed to be 21 degrees. The resulting minimum factor of safety was calculated to be 1.54

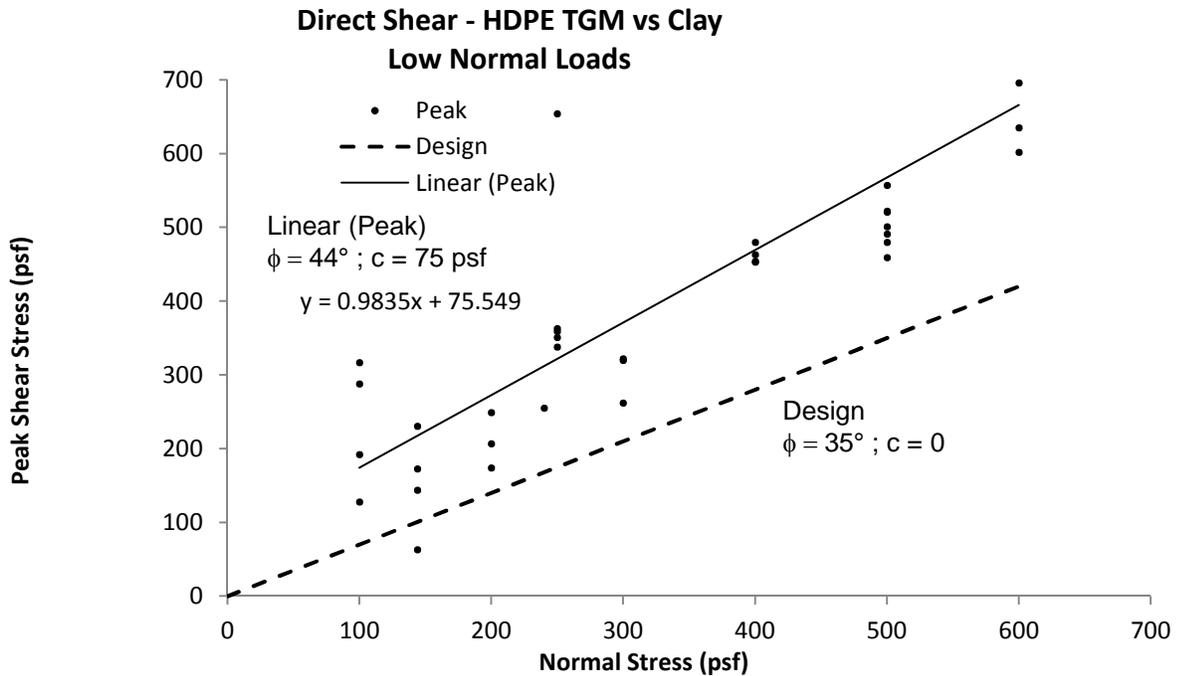
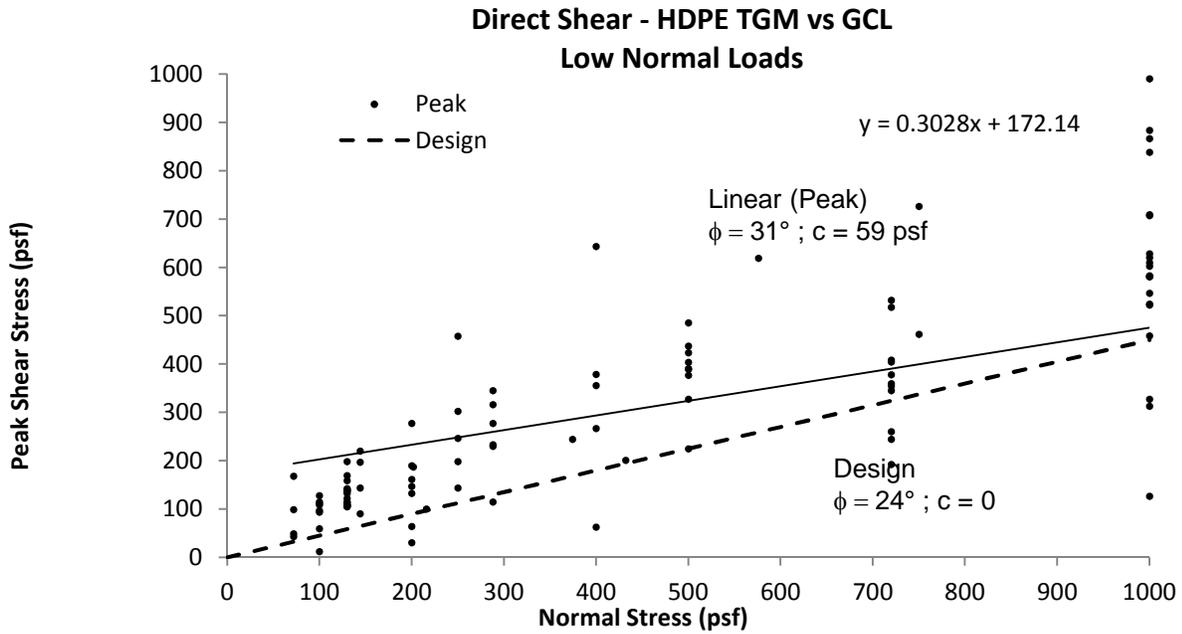
## 6.0 CONCLUSION

The slope stability analysis indicates that the final cover slope is stable.

## 7.0 REFERENCES

Shear-Normal plots from unpublished data from tests performed in Golder's laboratory.





**APPENDIX III3D-4**

**LEACHATE COLLECTION SUMP CAPACITY**

## LEACHATE COLLECTION SUMP CAPACITY

Made by: CEI  
 Checked by: MX  
 Reviewed by: JBF

### 1.0 OBJECTIVE

Calculate the volume and capacity of a typical leachate collection sump and, with this quantity, estimate the sump cycle time.

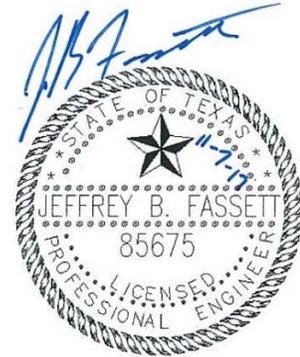
### 2.0 GIVEN

The typical dimensions for the lateral expansion sumps are provided below. Because sumps for the overliner option are larger in size, their capacities are not evaluated for the purpose of this calculation.

Sump base dimensions: 30 ft long  
 24 ft wide  
 2 ft deep

Sideslopes in sump: 3 :1 (horizontal:vertical)

Sump gravel porosity: 0.3



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Typically, the transducer and control panel is set to shut down the pump with 1 foot of leachate left in the sump to keep the pump from overheating. Likewise, to maintain less than 30 cm of leachate above the liner system, the transducer and control panel is set to turn on at 0 ft to a maximum of 1 ft above liner. To be conservative for the sump cycle calculations, 0 ft above liner is used.

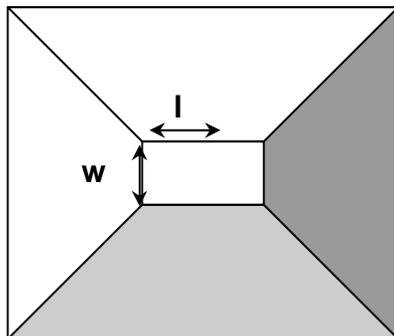
Tranducer Start/Stop Elevations from bottom of sump: 2 ft (start level)  
 1 ft (stop level)

### 3.0 CALCULATIONS

#### 3.1 Total Sump Volume & Sump Capacity

$$V = 1/3 (A_1 + A_2 + (A_1 A_2)^{1/2}) D \quad \text{where}$$

$A_1$  = area at base of sump  
 $A_2$  = area at top of sump  
 $D$  = depth of sump



Plan View



Profile View

$$\text{Sump Capacity} = \text{Gravel Porosity} * \text{Total Sump Volume}$$

Assuming leachate remains at the base of the sump at the set transducer elevation, the remaining void volume in the sump is:

Base Area	Top Area	Depth	Total Vol.	Sump Capacity	
(ft <sup>2</sup> )	(ft <sup>2</sup> )	(ft)	(ft <sup>3</sup> )	(ft <sup>3</sup> )	gallons
1,080	1,512	1	1,290	387	2,895

### 3.2 Time to Fill Sump, Worst-case Conditions

The time it takes to fill the sump when leachate remains at the sump base and worst-case conditions exist is:

Q <sub>max</sub> ft <sup>3</sup> /acre/day	Area <sub>max</sub> acre	Maximum flow into sump			Time to fill sump		
		ft <sup>3</sup> /day	gal/day	gal/min	day	hr	min
956	20.9	19,980	149,453	104	0.02	0.5	28

The maximum leachate generation rate was computed by the HELP model to be 956 ft<sup>3</sup>/acre/day.

The maximum contributing area is Cell 12A of 20.9 acres.

### 3.3 Time to Fill Sump, Typical Conditions

The time it takes to fill the sump when leachate remains at the sump base and typical conditions exist is:

Q <sub>ave</sub> ft <sup>3</sup> /acre/yr	Area <sub>max</sub> acre	Average flow into sump			Time to fill sump		
		ft <sup>3</sup> /day	gal/day	gal/min	day	hr	min
12,494	20.9	715	5,351	4	0.15	3.5	209

The maximum average annual leachate generation rate was computed by the HELP model to be 12,494 ft<sup>3</sup>/acre/yr.

The maximum contributing area is Cell 12A of 20.9 acres.

### 3.4 Sump Cycle Times

Sump cycles times should be greater than 15 minutes or number of cycles should not be greater than 100 cycles per day to prevent overheating and complete failure. The cycle time is the time to remove two sump volumes.

Worse-case Condition			Typical Condition		
min	day	cycles/day	min	day	cycles/day
56	0.04	26	418	0.29	3

## 4.0 CONCLUSION

Each sump will have a capacity of approximately 2,895 gallons. Under worst-case conditions, leachate will reach the crest of the sump approximately 0.5 hours after pumping. Under typical conditions, leachate will reach the crest of the sump approximately 3.5 hours after pumping. Therefore, the sump design will provide adequate time for sump cycling.

**APPENDIX III3E-1**

**SUFFICIENT BALLAST CALCULATIONS**

Made by: CEI  
 Checked by: MX  
 Reviewed by: JBF

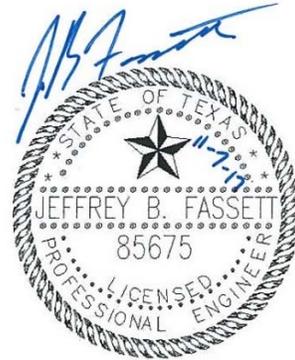
## SUFFICIENT BALLAST CALCULATIONS

### 1.0 OBJECTIVE

Provide ballast calculations in accordance with Appendix III3F, Liner Quality Control Plan (LQCP).

### 2.0 APPROACH

The factor of safety against hydrostatic uplift is defined as the sum of the resisting forces provided by the ballast (weight) of overlying materials including protective soil cover, waste, and final cover, divided by the hydrostatic uplift forces acting at the base of the geomembrane liner. As described in the LQCP, a factor of safety of 1.5 is required when waste is being used as the ballast material.



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### 3.0 EXAMPLE BALLAST CALCULATIONS

Provided below are example calculations demonstrating the factor of safety in the final fill condition and the waste thickness required to achieve a factor of safety of 1.5.

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Final-Filled Condition		Ballast Offset (lb)			Hydrostatic Force (lb)	
Slope of Alternative Liner at Evaluation Point	3 H:1V	<i>Final Cover</i>	<i>Waste</i>	<i>Protective Cover</i>	<i>Alternate Liner</i>	<i>Ground-water</i>
Top Elevation (ft-msl)		120.0	116.5	74.0	72.0	75.8
Thickness (ft)		3.5	42.5	2.0	-	3.8
Unit Weight (pcf)		115.0	44.0	105.0	-	62.4
<b>Hydrostatic Offset Factor</b>	<b>9.4</b>	2234.3			237.1	

Waste Thickness Required		Ballast Offset (lb)		Hydrostatic Force (lb)	
Slope of Alternative Liner at Evaluation Point	3 H:1V	<i>Waste</i>	<i>Protective Cover</i>	<i>Alternate Liner</i>	<i>Ground-water</i>
Top Elevation (ft-msl)		79.9	74.0	72.0	76.5
Thickness (ft)		<b>5.9</b>	2.0	-	4.5
Unit Weight (pcf)		44.0	105.0	-	62.4
<b>Hydrostatic Offset Factor</b>	<b>1.5</b>	421.2		280.8	

#### 4.0 CALCULATIONS AND RESULTS

Final filled condition and waste thickness required ballast calculations for each evaluation point within the lateral expansion area of Units 7 and 8 as well as remaining cell construction in Unit 6 as depicted in Figure III3E-1-1 is summarized in the tables below. The evaluation points provided represent the worse-case locations for each unit cell. The final cover, protective cover, and alternate liner elevations are the same for each ballast evaluation point. In addition, the final cover and protective cover thickness as well as associated unit weight is assumed to be the same as the sample calculation provided above.

Final-Filled Condition	Factor of Safety	Component Elevations				
		Final Cover	Waste	Protective Cover	Alternate Liner	Ground-water
Point 1 - Unit 7, Cell 1	<b>8.5</b>	120.0	116.5	74.0	72.0	76.2
Point 2 - Unit 7, Cell 2	<b>8.7</b>	120.0	116.5	74.0	72.0	76.1
Point 3 - Unit 7, Cell 3	<b>9.4</b>	120.0	116.5	74.0	72.0	75.8
Point 4 - Unit 7, Cell 4	<b>9.2</b>	120.0	116.5	74.0	72.0	75.9
Point 5 - Unit 7, Cell 5	<b>8.5</b>	120.0	116.5	74.0	72.0	76.2
Point 6 - Unit 7, Cell 6	<b>NA</b>	120.0	116.5	74.0	72.0	70.2
Point 7 - Unit 7, Cell 7	<b>NA</b>	120.0	116.5	74.0	72.0	71.8
Point 8 - Unit 7, Cell 8	<b>19.9</b>	120.0	116.5	74.0	72.0	73.8
Point 9 - Unit 7, Cell 9	<b>10.9</b>	120.0	116.5	74.0	72.0	75.3
Point 10 - Unit 7, Cell 10	<b>9.2</b>	120.0	116.5	74.0	72.0	75.9
Point 11 - Unit 7, Cell 11	<b>8.3</b>	120.0	116.5	74.0	72.0	76.3
Point 12 - Unit 7, Cell 12	<b>8.0</b>	120.0	116.5	74.0	72.0	76.5
Point 13 - Unit 8, Cell 1A	<b>6.8</b>	120.0	116.5	74.0	72.0	77.3
Point 14 - Unit 8, Cell 1B	<b>5.3</b>	120.0	116.5	74.0	72.0	78.7
Point 15 - Unit 8, Cell 2A*	<b>7.0</b>	120.0	116.5	74.0	72.0	77.1
Point 16 - Unit 8, Cell 2B*	<b>6.1</b>	120.0	116.5	74.0	72.0	77.9
Point 17 - Unit 6, Cell 5B	<b>7.2</b>	120.0	116.5	74.0	72.0	77.0
Point 18 - Unit 6, Cell 7A	<b>7.6</b>	120.0	116.5	74.0	72.0	76.7
Point 19 - Unit 6, Cell 6B	<b>7.5</b>	120.0	116.5	74.0	72.0	76.8

NA: Groundwater elevation is below liner elevation.

\* Unit 8 evaluation point similar to that of overliner option.

Waste Thickness Required	Waste Thickness	Factor of Safety	Component Elevations			
			Waste	Protective Cover	Alternate Liner	Ground-water
Point 1 - Unit 7, Cell 1	5.2	1.5	79.2	74.0	72.0	76.2
Point 2 - Unit 7, Cell 2	4.9	1.5	78.9	74.0	72.0	76.1
Point 3 - Unit 7, Cell 3	4.2	1.5	78.2	74.0	72.0	75.8
Point 4 - Unit 7, Cell 4	4.4	1.5	78.4	74.0	72.0	75.9
Point 5 - Unit 7, Cell 5	5.2	1.5	79.2	74.0	72.0	76.2
Point 6 - Unit 7, Cell 6	0.0	1.5	74.0	74.0	72.0	70.2
Point 7 - Unit 7, Cell 7	0.0	1.5	74.0	74.0	72.0	71.8
Point 8 - Unit 7, Cell 8	0.0	1.5	74.0	74.0	72.0	73.8
Point 9 - Unit 7, Cell 9	3.0	1.5	77.0	74.0	72.0	75.3
Point 10 - Unit 7, Cell 10	4.4	1.5	78.4	74.0	72.0	75.9
Point 11 - Unit 7, Cell 11	5.4	1.5	79.4	74.0	72.0	76.3
Point 12 - Unit 7, Cell 12	5.9	1.5	79.9	74.0	72.0	76.5
Point 13 - Unit 8, Cell 1A	7.8	1.5	81.8	74.0	72.0	77.3
Point 14 - Unit 8, Cell 1B	11.1	1.5	85.1	74.0	72.0	78.7
Point 15 - Unit 8, Cell 2A*	7.3	1.5	81.3	74.0	72.0	77.1
Point 16 - Unit 8, Cell 2B*	9.2	1.5	83.2	74.0	72.0	77.9
Point 17 - Unit 6, Cell 5B	7.0	1.5	81.0	74.0	72.0	77.0
Point 18 - Unit 6, Cell 7A	6.3	1.5	80.3	74.0	72.0	76.7
Point 19 - Unit 6, Cell 6B	6.6	1.5	80.6	74.0	72.0	76.8

\* Unit 8 evaluation point similar to that of overliner option.

## 5.0 CONCLUSION

A ballast calculation was performed at each evaluation point depicted on Figure III3E-1-1 within the lateral expansion area of Unit 7. The evaluation point number 12 selected within Cell 12 where the difference between the seasonal high groundwater surface and the design basegrade is the greatest is the worst-case scenario. The final filled condition has a factor of safety of 8.0 and 5.9 ft is the thickness of waste required to achieve a factor of safety of 1.5. Review of the results indicate that long-term ballast is adequate for the proposed design.

**APPENDIX III3E-2A  
UNDERDRAIN SEEPAGE CALCULATION**

## UNDERDRAIN SEEPAGE CALCULATION

Made by: JX  
Checked by: MX  
Reviewed by: JBF

### 1.0 OBJECTIVE

Use finite element analyses to model seepage and estimate the potential seepage flow under the Edinburg Regional Disposal Facility expansion area liner system. Design the underdrain system to limit build-up of water pressure under the most critical seepage conditions.

### 2.0 DISCUSSION

#### 2.1 Site Conditions

The subsurface stratigraphy of the site includes three units, Stratum I, II, and III. These units are comprised of: sandy clays/clayey sands (Stratum I); silty fine sand and sand (Stratum II); and high plasticity, hard, dry clay (Stratum III). Based upon an evaluation of the soil boring and groundwater data from site investigations, Stratum II is the uppermost water bearing layer. Stratum I in general acts as a confining layer for Stratum II. Stratum I is underlain by Stratum II at an approximate elevation of 65 ft msl (mean sea level) in the northern cells and 55 ft msl in the southern cells. Stratum II is underlain by Stratum III at an approximate elevation of 45 ft msl in the northern cells and 35 ft msl in the southern cells. Cell excavation in the expansion area will be within Stratum I.

Seasonal high groundwater elevations, based on historical groundwater measurements, are shown on Figures III3E-2A-1.

The cell liner system for the facility includes a geosynthetic clay liner (GCL), a geomembrane liner and 2 feet of protective cover soil.

#### 2.3 Underdrain Design

In cell areas where the subgrade elevation will be lower than the seasonal high groundwater elevation, an underdrain system will be installed. The proposed underdrain design includes a toe drain (consisting of a perforated pipe in a gravel filled trench), a geocomposite drainage layer on the cell sideslope, and a sump at the end of the cell (underneath the leachate sump). The underdrain is designed to reduce the hydrostatic uplifting forces on the liner system.

### 3.0 METHOD

Use SEEP/W, a 2-Dimensional finite element analysis program, to estimate flow into the underdrain based on a generalized subsurface stratigraphy. For conservative purposes, the worst-case scenario is used to calculate the anticipated flow and design the underdrain capacity.



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## 4.0 INPUT PARAMETERS

### 4.1 Soil Parameters

Permeability parameters were determined by measuring the hydraulic conductivity of the soils with a flexible wall permeameter (ASTM Test Method D5084). The horizontal hydraulic conductivity of Stratum II was based on field slug test data. Details on Edinburg Regional Disposal Facility soil stratum properties are available in the Geology Report in Part III4, Geology Report.

Stratum Number	Horizontal Permeability $K_x$ (cm/s)	Horizontal Permeability $K_x$ (ft/s)	Vertical Permeability $K_y$ (cm/s)	Vertical Permeability $K_y$ (ft/s)	$K_y/K_x$ Ratio
I	1.75E-06	5.74E-08	2.18E-07	7.15E-09	0.125
II	1.65E-04	5.41E-06	1.91E-04	6.27E-06	1.158
III	1.63E-07	5.35E-09	8.84E-09	2.90E-10	0.054

Due to the pockets of sand found in Stratum I, the models were conservatively designed such that the material properties of Stratum I actually reflect permeability of Stratum II. This would result in a greater flow into the underdrain, which in turn will produce a conservative underdrain design.

### 4.2 Critical Cross Sections

The critical cross-section will occur along portions of the Edinburg Regional Disposal Facility Unit 7 that have the highest seasonal groundwater level underlying the liner system (geosynthetic clay liner, geomembrane liner, and 2 feet of protective cover soil). Three cross-sections were selected to represent the most critical conditions. All cross-sections were modeled assuming Stratum II layer is a consistent 20 ft thickness. Two cross-sections are on the north side of the expansion, one in Cell 12A and the other in Cells 10A and 11A. On the south side of the expansion, a cross-section was selected in Cell 1. The cross-sections align with the groundwater flow directions. Locations of the cross-sections are shown on Figures III3E-2A-1.

### 4.3 Boundary Conditions

#### 4.3.1 Sideslope Underdrain and Liner System

A geocomposite underdrain layer will be placed along the sideslope to intercept, collect, and transmit groundwater to the toe of the slope. The sideslope underdrain was modeled as a seepage face; i.e. a free draining surface with no positive pore pressures. The liner system was modeled as an impenetrable boundary.

#### 4.3.2 Total Head

Total head boundaries were set to represent hydrostatic groundwater conditions below existing grade.

For North Cross-Section 1, the highest seasonal groundwater elevations ranged from 78 ft msl at the western boundary of Cell 12A to 76 ft msl at the northern boundary of Cell 12A.

For North Cross-Section 2, the highest seasonal groundwater elevation ranged from 77.5 ft msl at the western boundary of Cell 11A to 75.5 ft msl at the northern boundary of Cell 10A.

For the South Cross-Section, the highest seasonal groundwater elevation ranged from 76.5 ft msl at the southern boundary of the expansion area to 75 ft msl at the northern point of Cell 1.

#### 4.3.3 Toe Drain

The toe drain was designed to be 2 feet wide by 2 feet deep and modeled as a sink (a node assigned zero pressure). A sink models a condition in which all water seeping into it is removed before creating a pressure condition.

## 5.0 RESULTS

SEEP/W output figure, showing analysis configurations, boundary conditions, phreatic surface, total head contours, etc., are attached. As discussed above, three cross-sections were modeled in the SEEP/W analyses, two for the generalized north cell orientation and one for the generalized south cell orientation. Section 5.1 presents the groundwater flows and Section 5.2 addresses the pore water pressure head on the liner.

### 5.1 Groundwater Flow Summary

Steady-state flow rate of groundwater into each toe-drain was calculated.

North cross-section 1, west toe drain =	1.15E-06	ft <sup>3</sup> /sec/ft
North cross-section 1, north toe drain =	1.42E-05	ft <sup>3</sup> /sec/ft
North cross-section 2, toe drain =	2.47E-05	ft <sup>3</sup> /sec/ft
South cross-section, toe drain =	1.60E-05	ft <sup>3</sup> /sec/ft
Maximum flow rate into the toe drain=	2.47E-05	ft <sup>3</sup> /sec/ft

Evaluation of the sideslope underdrain geocomposite calculation is presented in Appendix III3E-2C.

### 5.2 Pore Water Pressure on The Liner

The analysis shows that the toe drains draw down the phreatic surface to below the liner elevations in the north cross-section 2 and south cross-section. In north cross-section 1, i.e. where the seasonal high groundwater elevation is the highest, the maximum pressure head exerted on the liner (GCL, geomembrane, and 2 feet protective cover soil) is 1.5 feet. The factor of safety against hydrostatic uplift is calculated as follows:

Maximum Pore Water Pressure =	93.6 psf (1.5 feet of water head at 62.4 pcf)
Ballast Pressure =	210 psf (2 feet of protective cover at 105 pcf)
Factor of Safety =	2.2 >1.2 OKAY

Since the factor of safety is above 1.2, the liner will exert enough pressure to offset the hydrostatic uplift from groundwater.

## 6.0 CONCLUSION

Based on the landfill's cross-sectional geometry, seasonal high groundwater table, subsurface soil properties and conservative assumptions listed above, the analysis shows that the maximum anticipated steady-state flow of groundwater to the proposed underdrain system is 2.47E-05 ft<sup>3</sup>/sec/ft. The maximum calculated steady-state flow of groundwater into the toe drain will not exceed the capacity of the underdrain collection pipe, as shown in the underdrain pipe sizing calculation in Appendix III-3E-2B. Additionally, the maximum pore water pressure head along the liner system is 1.5 feet; therefore, the hydrostatic pressure exerted on the liner by the groundwater can be offset over the short-term by the 2-ft thick protective cover soil with a factor of safety greater than 1.2. Long term ballast will be achieved with a combination of soil and overlying waste with a factor of safety greater than 1.5 as shown in Appendix III-3E-1.

**APPENDIX III3F**  
**LINER QUALITY CONTROL PLAN**

# LINER QUALITY CONTROL PLAN

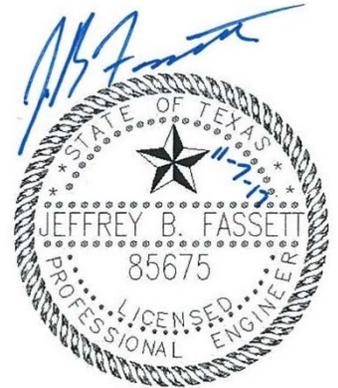
Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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July 2017  
Revised: November 2017

Project No. 1401491



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## **1.0 PURPOSE**

### **1.1 Purpose**

30 TAC §330.339(a)

This Liner Quality Control Plan (LQCP), is prepared under the direction of a licensed professional engineer, and it is the basis for the type and rate of quality control testing performance and reported in the liner evaluation report (LER) as required in §30 TAC §330.341. The plan provides operating personnel adequate procedural guidance for assuring continuous compliance with groundwater protection requirements. The plan specifies construction methods employing good engineering practices for installation and testing of components of the alternative liner including geosynthetic clay liner (GCL), geomembrane (GM), leachate collection and removal system (LCRS), and protective cover soil. In addition, dewatering plans are included.

### **1.2 Liner Quality Control Testing Procedures**

30 TAC §330.339(a)(2)

The liner quality control testing procedures, including sampling frequency, are provided in this LQCP. All field sampling and testing, both during construction and after completion, shall be performed by a person acting in compliance with the provisions of the Texas Engineering Practice Act and other applicable state laws and regulations. The professional of record who signs the LER or his representative should be on site during all liner construction. Quality control of construction and quality assurance sampling and testing procedures should follow the latest technical guidelines of the TCEQ.

## **2.0 GEOSYNTHETIC CLAY LINER**

This section presents general procedures, quality control testing requirements, and installation procedures for geosynthetic clay liner (GCL) construction. The GCL approved for use at the site consists of sodium bentonite encapsulated between two geotextile layers, needle-punched or stitched-bonded together.

### **2.1 Pre-Installation Material Evaluation**

#### **2.1.1 Manufacturer's Quality Control Certificates**

Prior to the installation of the GCL, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. The manufacturer must provide documentation certifying the material was continuously inspected for broken needles, and is needle free. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in accordance with project-specific testing methods and subject to the minimum testing frequency shown in Table III3F-1, GCL QC Submittal Frequency & Material Specifications. The owner may require more frequent testing at his discretion.

The quality control testing may be performed in the manufacturing plant. The POR shall review the test results prior to accepting the GCL to ensure that the certified minimum properties meet the values presented in Table III3F-1, GCL QC Submittal Frequency & Material Specifications.

### **2.1.2 Conformance Testing**

In addition to the manufacturer's quality control certificates, samples of rolls of GCL will be obtained for conformance testing. The samples shall be tested by an independent third party laboratory in accordance with Table III3F-2, GCL Conformance Test Schedule. The POR shall review the test results to ensure that they meet the values presented in Table III3F-1, GCL QC Submittal Frequency & Material Specifications.

The POR shall compare measured shear strength values to those used in the stability analyses included in Appendix III3B-2B, III3B-2C, and III3B-2D. If the measured interface shear strength is less than the values used in the analyses, the stability of the liner system shall be reassessed and revised calculations shall be included in the Liner Evaluation Report (LER).

### **2.1.3 Shipping and Unloading**

In order to prevent premature hydration, the GCL rolls shall be shipped in plastic wrapping that shall remain intact until material installation. Rolls shall be labeled with the manufacturer's name, product identification, roll and lot number, roll dimensions, weight and any other information to trace the quality assurance documentation. Upon delivery of the GCL, storage and handling procedures shall be documented. The rolls will be stacked, stored above ground, covered, and handled in accordance with ASTM D5888 or manufacturer's recommendations. If any rolls are damaged during shipping, unloading or storage or if the outer portion becomes partially hydrated, the damaged portion shall be removed before the roll is deployed.

**Table III3F-1: GCL QC Submittal Frequency & Material Specifications**

<b>Bentonite</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Fluid Loss	max.	ml	18	ASTM D5891	1 per 50 tons or every truck or railcar
Free Swell	min.	ml	24	ASTM D5890	
<b>Geotextile</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Mass per Unit Area	—	g/cc	—	ASTM D5261	1 per 200,000 ft <sup>2</sup>
Tensile Properties:	—	lb	—	ASTM D4632	
<b>GCL Product</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Bentonite Mass	min.	lb/ft <sup>2</sup>	0.8	ASTM D5993	1 per 40,000 ft <sup>2</sup>
Bentonite Moisture Content	—	%	—	ASTM D5993	
Grab Tensile Strength	—	lb	—	ASTM D6768	1 per 200,000 ft <sup>2</sup>
Hydraulic Flux	max.	m <sup>3</sup> /m <sup>2</sup> -s	1 x 10 <sup>-8</sup>	ASTM D5887	1 per week for each production line <sup>(2)</sup>
Lap Joint Permeability	Max	cm/sec	1 x 10 <sup>-8</sup>	Flow Box or other suitable device	1 per material and lap type

Notes:

1. Updated methods may be implemented based on a review by the POR.
2. Report last 20 test values, ending on production date of supplied GCL.
3. For those properties that do not indicate a value, the GCL material must meet the manufacturer's minimum specification.

**Table III3F-2: GCL Conformance Test Schedule**

<b>TEST</b>	<b>METHOD<sup>(1)</sup></b>	<b>FREQUENCY</b>
Bentonite Mass/Unit Area	ASTM D5993	Not less than 1 test per 100,000 ft <sup>2</sup>
Hydraulic Flux	ASTM D5887	
Direct Shear <sup>(2)(3)</sup>	ASTM D6243	1 test per GCL/adjoining material

Notes:

1. Updated methods may be implemented based on a review by the POR.
2. Direct shear testing shall be performed on the GCL/geomembrane/geocomposite sandwich. Soak interface and apply normal stresses of 1000, 5000, and 18,000 psf for at least 1 hour prior to shearing at a displacement rate of 0.04 in/min.
3. The testing results shall be compared to the values used in the stability analyses included in the Appendix III3B-3B. If the measured interface shear strength is less than the values used in the analyses, the stability of the liner system shall be reassessed and revised calculations shall be included in the GLER.
4. Test results from materials used during one construction event may be used in subsequent events provided the materials used are the same and approved by the POR.

## **2.2 Installation Procedures**

### **2.2.1 GCL Subgrade Preparation**

Surfaces to be lined should be smooth and free of all rocks greater than 0.75-inch diameter (or as recommended by the manufacturer, if less than 0.75 inches), sharp/angular objects, sticks, roots, or debris of any kind. The surface should provide a firm, unyielding foundation for the GCL with no sudden, sharp, or abrupt changes or break in grade. The subgrade surface shall be prepared by rolling with a smooth-drum roller to minimize the roughness and press down protruding soil or rock particles prior to GCL deployment. Loose rocks and/or dry soil particles that could damage the GCL shall be removed. Excessive voids or dimples shall be filled with soil.

Standing water or excessive moisture on the subgrade will not be allowed. The subgrade shall be maintained in a smooth, uniform, and drained condition.

### **2.2.2 Anchor Trench Construction**

The anchor trench shall be constructed according to the project plans and specifications, and the excavation and backfilling operations shall be documented. If the anchor trench is excavated in a clay material susceptible to desiccation, the amount of anchor trench open at any time should be minimized. The inside edge of the trench shall be rounded so as to avoid stresses from sharp bends in the GCL. The GCL will not be placed into the anchor trench on top of any rocks greater than 0.75-inch diameter, sharp/angular objects, sticks, roots, or debris of any kind. The anchor trench shall be adequately drained to prevent ponding or hydration of the GCL while the trench is open. The anchor trench shall be backfilled and compacted according to the project plans and specifications; however, backfilling shall be performed, at a minimum, with ordinary compaction as deemed suitable by the POR.

### **2.2.3 GCL Deployment**

Equipment used to deploy GCL must not cause excessive rutting of the subgrade. Deployed GCL panels should contain no folds or excessive slack. Installation personnel must not smoke or wear damaging shoes on GCL. GCL should not be placed during excessive winds. Sand bags should be used to anchor deployed GCL when necessary. In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the GCL. If the POR or CQA monitor observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Generators, gasoline or solvent cans, tools, or supplies must not be stored directly on the GCL. GCL must be rolled into position, not drug across the subgrade. Deployed GCL must not be used as a work area without adequate protection such as a rub sheet.

Panels should be overlapped and seamed, as recommended by the manufacturer. End-to-end seams on sideslopes are not allowed. Care must be taken to assure the GCL is installed with the proper side up.

GCL deployment shall be limited to the amount that can be covered with the overlying geomembrane liner the same day. GCL deployment shall not be undertaken during precipitation or when there is an impending threat of precipitation. GCL deployed on 5H:IV or steeper slopes shall be rolled down the slopes, not cross slope.

Following deployment, the CQA monitor shall visually examine the entire surface of the GCL for even bentonite distribution, thin spots, or other panel defects. All defects will be recorded and repaired in accordance with this LQCP. The QA/QC representative shall also verify the following:

- Proper overlap during deployment
- Seams between GCL panels are constructed per manufacturer's recommendations
- Defects are patched and overlapped properly
- The bentonite has not become excessively hydrated
- No stones, tools, cutting blades or other objects that could damage the GCL are present on the GCL.

Excessively hydrated GCL shall be removed and replaced with new material. Geomembrane shall not be placed on hydrated GCL.

GCL panels shall be given an identification code, mapped, and logged to record relevant installation information.

#### **2.2.4 GCL Repairs**

Torn or otherwise damaged geosynthetic facing must be patched with the same type of geosynthetic. The geosynthetic patch must extend at least 12 inches beyond the damaged area and must be heat bonded, or otherwise attached to the main GCL to avoid shifting during placement of overlying geosynthetics. If the GCL damage includes loss of bentonite, the patch must consist of full GCL extending at least 12 inches beyond the damaged area. Lapping procedures must be the same as specified for original laps of GCL panels.

#### **2.2.5 GCL Protection**

The overlying geosynthetics and soil layers shall be deployed in such a manner as to ensure that the GCL is not damaged. Textured geomembranes shall not be dragged across previously installed GCL. A smooth rubsheet shall be placed between the GCL and textured geomembrane to prevent damage. The rubsheet will be removed when the geomembrane is in position. Other methods may be employed at the POR's discretion.

To avoid local bentonite displacement, and the possible impact on the hydraulic performance of a GCL, the protective cover soil of suitable thickness should be placed over the geomembrane and geocomposite

overlying the GCL as soon as practicable following completion of the geomembrane and leachate collection system construction.

### **3.0 GEOMEMBRANE LINER**

This section presents general procedures, quality control testing requirements, and construction specifications for geomembrane liner construction. The alternative liner design includes the use of a 60-mil high-density polyethylene (HDPE) geomembrane liner with an exception for the overliner option which includes the use of a 60-mil linear low-density polyethylene (LLDPE) because its elastic properties are better suited for potential waste settlement.

#### **3.1 Pre-installation Material Evaluation**

##### **3.1.1 Manufacturer's Quality Control Certificates**

Prior to the installation of any geomembrane, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in the manufacturing plant using the test methods and frequencies listed in the most recent version of the Geosynthetic Research Institute (GRI) test method GM13 for HDPE geomembrane and GM17 for LLDPE geomembrane. Recycled or reclaimed materials must not be used in the manufacturing process. The owner may require more frequent testing at his/her discretion.

The POR shall review the test results prior to accepting the geomembrane to assure that the certified minimum properties meet the minimum values for textured geomembranes, as determined by the most recent GRI test method GM13 or GM17. The current versions of the GRI test methods are included in Appendix III3F-1.

Resumes of the installer's supervisor(s) or Master Seamer(s) shall be obtained to verify that adequate seaming experience will be utilized on the project. The installer's supervisor or Master Seamer shall have had experience totaling a minimum of 2,000,000 square feet of geomembrane installation.

##### **3.1.2 Conformance Testing**

In addition to the manufacturer's quality control certificates, samples of the geomembrane will be obtained either at the manufacturing facility or upon delivery to the site for conformance testing. The test samples shall be obtained for conformance testing in accordance with the testing schedule shown in Table III3F-3, Geomembrane Conformance Test Schedule. Testing must be performed by an independent third party laboratory.

The POR shall review the test results to ensure that they meet the values presented in Table III3F-3, Geomembrane Conformance Test Schedule.

**TABLE III3F-3: Geomembrane Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Thickness (laboratory measurement)	ASTM D5994 (Textured)	Not less than 1 test per 50,000 ft <sup>2</sup> and every resin lot.
Density	ASTM D1505 or D792	Not less than 1 test per 100,000 ft <sup>2</sup> with not less than 1 per resin lot
Carbon black content	ASTM D4218	
Carbon black dispersion	ASTM D5596	
Tensile properties	ASTM D6693, Type IV	

Notes:

- Updated ASTM or GRI methods may be implemented based on a review by the POR.

### 3.1.3 Shipping and Storage

Each roll shall be labeled with the manufacturing name, product identification, roll and lot number, dimensions, weight and any other information to trace quality assurance documentation. Upon delivery, storage and handling procedures shall be documented. Rolls shall be stacked, stored and handled in accordance with ASTM D5888 or the manufacturers recommendations. As a general rule, rolls should not be stacked more than four rolls high, and must be handled in a manner that does not damage the material. If any roll is observed to be damaged during shipping, unloading or storage, the damaged portion shall be removed before the roll is deployed.

The rolls delivered to the site shall be inventoried, recording the manufacturer's name and product identification, and the roll thickness, number, and dimensions. Manufacturer's certificates should be cross-referenced to rolls delivered on-site.

## 3.2 Installation Procedures

### 3.2.1 Geomembrane Deployment

The geomembrane shall be installed in direct and uniform contact with the GCL. The geomembrane shall not be placed during inclement weather, such as high winds or rain. Deployment of the geomembrane must not damage the underlying GCL. Geomembrane shall be unrolled, not drug across the GCL.

Geomembrane seaming should generally not take place when ambient temperatures are below 32 degrees Fahrenheit (°F), unless preheating is used. For extrusion welding, preheating will be required if the temperature is below 32°F and follow the procedures in the Geosynthetic Research Institute (GRI) Test Method GM-9. For fusion welding, preheating may be waived if the installer demonstrates that quality welds may be obtained without preheating. Seaming shall not be permitted at ambient temperatures above 104°F, unless the installer can demonstrate that seam quality is not compromised.

In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geomembrane or GCL. If the POR observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Personnel working on the geomembrane shall not smoke, wear damaging shoes, or engage in any other activity likely to damage the geomembrane. Only those sections that are to be placed and seamed in one day should be unrolled. Panels left unseamed should be anchored with sandbags or other suitable weights. In general, seams should be oriented parallel to the line of maximum slope (i.e., oriented up and down, not across the slope). In corners and odd-shaped geometric locations, the number of field seams should be minimized. If end seams are necessary on the sideslope, locate them in the lower half of the slope. Seams that join the side slope panels to the floor should be located at least 5 feet from the toe of the slope.

Panels should be overlapped, as recommended by the manufacturer, as appropriate for the type of seam welding to be performed; however, overlapping shall be no less than 3 inches and shall be verified by the POR or the CQA monitor. Field seaming shall only be performed by the method(s) approved by the manufacturer, either by extrusion welding or double-tracked fusion welding. No seaming shall take place without the installer's supervisor or Master Seamer and CQA monitor being present. Fishmouths, or wrinkles at the seam overlap, shall be cut along the ridge of the wrinkle to achieve a flat overlap. The cut shall be seamed and/or patched. Seams shall extend to the outside edge of panels placed in the anchor trench.

Panel layout and field seams shall be given an identification code, mapped, and logged to record relevant installation information. Inspection and testing records shall be logged as well as repair and retest data. Section 7.0 includes a thorough list of items to be documented during geomembrane construction and testing.

### **3.3 Installation Monitoring and Testing**

#### **3.3.1 Trial Seams**

Each day prior to commencing field seaming, trial seams shall be made on pieces of geomembrane material to verify that conditions are adequate for production seaming. Trial seams shall be made at the beginning of each seaming period and shift (generally, at least twice each day) for each combination of production seaming machine and operator to be used that day. The trial test seam shall be at least 3 feet long by 1 foot wide (after seaming) with the seam centered lengthwise. Four 1-inch wide specimens shall be die-cut from the trial seam sample using a calibration field extensometer. Two specimens shall be tested in the field for shear and two for peel (test both inner and outer welds for dual track fusion welding) and shall be compared to the minimum seam strength requirements specified in the most current version of the Geosynthetic Research Institute, GRI Test Method GM19. The current versions of the GRI test methods

are included in Appendix III3F-1. A copy of the current calibration certificate for the extensometer must be provided by the installer.

If any of the trial seam specimens fail, the entire trial seam operation shall be repeated. If an additional specimen fails during the second trial seam, the seaming machine and seamer shall not be used for seaming until the deficiencies are corrected and two consecutive successful trial seams are achieved. Additional trial seams shall be performed if frequent field seaming problems are experienced or if power to the seaming machines is interrupted sufficiently long to require rewarming.

### 3.3.2 Non-Destructive Testing

Continuous, non-destructive testing shall be performed on all seams by the installer. All leaks must be isolated and repaired by following the procedures described in this LQCP.

Air Pressure Testing – ASTM D5820. The ends of the air channel of the dual-track fusion weld must be sealed and pressured to approximately 30 pounds per square inch (psi), if possible. The air pump must then be shut off and the air pressure observed after 5 minutes. A loss of less than 4 psi is acceptable if it is determined that the air channel is not blocked between the sealed ends. A loss greater or equal to 4 psi indicates the presence of a seam leak that must then be isolated and repaired by following the procedures described in this LQCP. The POR or his/her qualified representative must observe and record all pressure gauge readings.

Vacuum-Box Testing – ASTM D5641. Apply a vacuum of approximately 4 to 8 psi to all extrusion welded seams that can be tested in this manner. The seam must be observed for leaks for at least 10 seconds while subjected to this vacuum. The POR or his/her qualified representative must observe 100% of this testing.

Other Testing. Other non-destructive testing must have prior written approval from the TCEQ.

### 3.3.3 Destructive Seam Testing

Destructive samples shall be taken at a minimum frequency of one test location, selected randomly, within each 500 linear feet of seam length, inclusive of both primary longitudinal and cross seams, cap strips, and repairs 20 square feet or larger. Each test sample should be of sufficient length and 12 inches wide with the seam located in the middle. Test specimens, approximately 1 inch wide, shall be cut from both ends of the sample for field testing (peel and shear). The remaining sample should be cut into three parts (one for quality assurance laboratory testing, one for installer quality control laboratory testing, and one for archive storage to be maintained at a location selected by the owner).

The field tests shall be conducted on a certified calibrated extensometer capable of maintaining a constant extension rate of 2 inches per minute. If one of the field test specimens from the ends of the destructive sample fails, then the seam will be considered to have failed, and repairs shall be initiated as described below. If both specimens pass, then a sample for laboratory testing will be sent to the quality assurance laboratory for testing in both peel and shear. Seam strengths for HDPE geomembranes shall meet the

minimum values specified in the most current version of the Geosynthetic Research Institute, GRI Test Method GM19 "Seam Strength and Related Properties of Thermally Bonded Polyolefin Geomembranes".

Destructive test results for both field and laboratory tests shall include qualitative data, including the location of the failure and locus-of-break code, as described in ASTM D6392. Peel tests on double-tracked fusion welds shall be performed on both inside and outside tracks of the weld. Seam break classifications for extrusion and fusion welds are shown on Figures III3F-1 and III3F-2, respectively.

At a minimum, a destructive test must be done for each welding machine used for seaming or repairs. A sufficient amount of the seam must be removed to conduct field testing, independent laboratory testing, and archiving of enough material to retest the seam when necessary. Destructive seam testing locations shall be cap-stripped and the cap completely seamed by extrusion welding to the geomembrane. Capped sections shall be non-destructively tested. Additional destructive test samples may be taken if deemed necessary by the POR or his/her qualified representative.

Weld Acceptance Criteria: For HDPE seams, the minimum passing criteria for destructive seam testing are described in the Geosynthetic Institute, GRI Test Method GM19. The POR must use the most current version of GM19 when evaluating welded seams.

Seam Failure Delineation: When a sample fails a destructive test, the installer shall trace the welding path to an intermediate location at least 10 feet in each direction, or a distance determined by the POR, from the point of the failed test and take 1-inch wide specimens for an additional set of field tests. If these additional samples pass the tests, then two laboratory destructive samples shall be taken adjacent to the intermediate locations or at locations determined by the POR or his/her representative. If these laboratory samples pass the tests, then the seam shall be repaired between these locations. If either sample fails, then the process shall be repeated to establish a zone where the seam should be repaired. All acceptable repaired seams shall be bounded by two locations from which samples passing laboratory destructive tests have been taken.

Seam Failure Repairs: Any portion of the geomembrane exhibiting a flaw or failing a destructive or non-destructive test shall be repaired. Repair methods may include spot welding (extrusion) for minor flaws and punctures; patches for larger holes and tears; capping for large lengths of failed seams or panel damage; and extrusion welding of outer flap to repair an inadequate fusion seam (less than 100-foot cumulative length) that has an exposed edge.

For any repair method, the following provisions shall be satisfied:

- Surfaces of the geomembrane that are to be repaired using extrusion methods shall be ground no more than one hour prior to the repair.
- All surfaces shall be clean and dry at the time of repair.
- Patches or caps shall extend at least 6 inches beyond the edge of the defect, and all corners of patches shall be rounded with a radius of approximately 3 inches.
- All repairs shall be non-destructively tested, as previously described.
- All seaming equipment, personnel, and operation procedures used in repair work shall meet the same requirements as for new seaming operations.

The POR or his/her qualified representative shall observe all non-destructive testing of repairs and shall record the number of each repair, type, date, and test outcome. Repairs that pass the non-destructive tests shall be taken as an indication of an adequate repair. Repairs more than 150 feet long shall also be required to have a destructive test performed. Repairs that fail the initial retest shall be redone and retested until a passing test results. All work and testing of repairs shall be fully documented in a repair log.

When placing overlying material on the geomembrane, effort must be made to minimize wrinkle development. If possible, cover should be placed during the coolest weather available. Small wrinkles should be isolated and covered as quickly as possible to prevent their growth. In no case shall the geomembrane be allowed to fold over on itself.

## **4.0 LEACHATE COLLECTION SYSTEM**

### **4.1 Leachate Collection System and Drainage Materials**

The leachate collection trenches and sumps shall be constructed in conjunction with liner construction. All GCL and geomembrane testing shall be completed prior to installing the leachate collection system on the area under evaluation. The locations of the trenches and sumps and design details are shown on the Figures III3-2A, III3-2B, III3-6A, III3-6B, and III3-8. The installation of the leachate collection system and protective cover system will have continuous inspection by the POR or his/her qualified representative(s). Quality assurance monitoring shall consist of measuring the dimensions of the excavated trenches and sumps, and documenting that the pipe, geotextile filters, bedding materials and drainage layers have been placed in accordance with the design details. All data and observations regarding construction of the leachate collection system shall be documented in the Liner Evaluation Report (LER).

Materials selected for use in the leachate collection system and drainage layers shall be verified by the POR to comply with this section of the LQCP.

#### **4.1.1 Double-sided Geocomposite Drainage Layer**

Geosynthetic drainage material shall conform to the material and performance properties specified in Table III3F-4, Geosynthetic Drainage Layer Specifications. Manufacturers' certificates of material and performance characteristics shall be obtained and documented at the minimum frequency shown on Table III3F-4, Geosynthetic Drainage Layer Specifications, with not less than one per resin lot. Geosynthetic drainage material conformance testing will consist of transmissivity testing on each material type using the test set-up described in Table III3F-4, Geosynthetic Drainage Layer Specifications.

The drainage layer for the leachate collection system will consist of a geosynthetic drainage layer over both the floor and sideslopes of the landfill cells. The geosynthetic drainage layer shall consist of a geonet with a nonwoven geotextile heat-bonded to both sides. The geosynthetic drainage layer shall be anchored in an anchor trench at the crest of the sideslopes.

Geotextile panels placed in the leachate collection system shall be overlapped and either heat-bonded or field sewn. Only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geotextile. Personnel working on the geotextile shall not smoke, wear damaging shoes, or engage in any activity that damages the geotextile, or underlying geosynthetics.

**TABLE III3F-4: Geosynthetic Drainage Layer Specifications**

Test Category	Product	Test <sup>a</sup>	Test Method <sup>b</sup>	Testing Frequency
Manufacturer	Resin (Geonet)	Density	ASTM D792 or D1505	One test per 100,000 ft <sup>2</sup> and every resin lot
		Melt Flow Index	ASTM D1238	
Manufacturer	Geonet	Density	ASTM D792 or D1505	One test per 100,000 ft <sup>2</sup> and every resin lot
		Nass / Area	ASTM D5261	
		Thickness	ASTM D5199	
		Compression	ASTM D1621	
		Transmissivity	ASTM D4716	
Manufacturer	Geotextile	Mass/Area	ASTM D5261	One test per 100,000 ft <sup>2</sup> and every resin lot
		Grab Tensile Strength	A ASTM D4632	
		Trapezoidal Tear Strength	ASTM D4533	
		Burst Strength	ASTM D3786	
		Puncture Strength	ASTN D4833	
		Thickness	ASTM D5199	
		Apparent Opening Size	ASTM D4751	
		Permittivity	ASTM D4491	
Independent Laboratory	Geocomposite Product	Transmissivity	ASTM D4716	One test per product type
		Interface Shear or Ply Adhesion	ASTM D5321 OR D413	One test per project

<sup>a</sup> Adapted from EPA/600/R-93/182, September 1993, and *Designing with Geosynthetics*, 6<sup>th</sup> ed.

<sup>b</sup> The POR may propose equivalent or better tests.

#### 4.1.2 Filter Geotextile

The leachate drainage aggregate that is placed in the collection trenches and sumps shall be wrapped in a geotextile filter fabric. The geotextile shall have the minimum properties listed in Table III3F-5, Nonwoven Filter Geotextile Specifications .

**Table III3F-5: Nonwoven Filter Geotextile Specifications**

Property	Qualifier	Unit	Value	Test Method	Frequency
Mass per Unit Area	MARV	oz/yd <sup>2</sup>	7.5	ASTM D5261	100,000 sf
AOS		US Sieve (mm)	80 (0.15)	ASTM D4751	550,000 sf

Property	Qualifier	Unit	Value	Test Method	Frequency
Puncture Resistance		lb	550	ASTM D6241	550,000 sf
Grab Tensile Strength		lb	205	ASTM D4632	100,000 sf

### 4.1.3 Leachate Pipe

The leachate piping includes perforated collection trench pipes and solid sideslope riser pipes. The leachate piping shall conform to ASTM D3350 with a minimum cell classification value of 345464C. The pipe shall have the minimum SDR rating and perforation schedule shown on the plans and specifications.

### 4.1.4 Drainage Material

Granular drainage materials, to be used in the underdrains, along the leachate collection lines, and in the sumps. At least one set of pre-construction tests shall be conducted for each drainage medium from each proposed source and a minimum of one per each 3000 cy. Pre-construction tests shall include a complete grain-size analysis, including minus No. 200 Sieve (ASTM D422) and calcium carbonate content (ASTM D3042 modified to use hydrochloric acid with a pH of 5 or the J&L method). The grain-size analysis will be used to determine if the material is compatible with the perforations in the leachate collection pipes and if the material is expected to achieve a minimum permeability of  $1 \times 10^{-2}$  cm/sec. The measured calcium carbonate content must not exceed 15 percent.

Granular drainage materials selected for use shall be tested at regular intervals for conformance during construction. Minimum testing frequency shall include one grain-size analysis for every 3,000 cubic yards, or portion thereof, for each material being used.

## 4.2 Protective Cover Material

Protective cover materials shall be free of deleterious materials that could puncture the synthetic lining system. The protective cover material shall be selected and placed so as not to harm the geomembrane or other geosynthetic layers. The installation of the leachate collection system and protective cover system will have continuous inspection by the POR or his/her qualified representative(s).

Visual observations shall be made to verify that no deleterious materials are present in the protective cover that could damage the lining and leachate collection systems or impede their performance as designed.

Alternate protective cover material, such as shredded tire chips, may only be used when overlying a protective layer of sufficient puncture resistance to prevent penetration of steel belting fragments or other deleterious materials through the geosynthetic drainage layers or geomembrane. Prior to use of an alternate protective cover material, written approval will be obtained from the TCEQ.

Protective cover does not require compaction control; however, it should be stable for construction and disposal traffic. Care shall be exercised in placement so as not to shift, wrinkle, or damage the underlying geosynthetic layers, and the placement methods shall be documented. Protective cover placement should be conducted at the coolest part of the day to minimize the development of wrinkles in the geosynthetic materials.

The protective cover shall be placed such that the top surface, while spreading, is at least 2 feet above the geosynthetic layers at all times unless low ground pressure dozers are used (i.e., track pressure less than 5 psi). A greater thickness shall be maintained to support loaded hauling trucks and trailers and for turning areas. Drivers shall proceed with caution when on the overlying soil and prevent spinning of tires, quick stops, or sharp turns.

The final thickness of the protective cover shall be a minimum 24 inches above a geosynthetic drainage layer. The required thickness of protective cover shall be verified by survey methods on an established grid system with not less than one verification point per 5,000 square feet of surface area.

## **5.0 DEWATERING SYSTEM**

Waste management unit excavations extend below the seasonal high water table resulting in upward or inward hydrostatic forces on the alternative liner. Measures will be taken to protect the liner and leachate collection system during construction below the seasonal high groundwater table. During construction of the alternative liner, groundwater will be controlled by installing an active dewatering system which includes an underdrain composed of toe drains, a geocomposite along the sideslopes, and an underdrain sump.

### **5.1 Foundation Evaluation**

Prior to excavating any waste management unit below the seasonal high water table, a preliminary foundation evaluation considering stability, settlement, and constructability shall be performed. This evaluation has been performed and is provided in Appendix III3B, Waste Management Unit Design Analyses.

### **5.2 Excavation**

Excavations below the water table can result in the excessive influx of groundwater and excavated bottom or slope instability. Since soil is typically excavated gradually for use as daily cover, groundwater influx can be controlled by allowing the seepage to drain away from the cell excavation area, thus temporarily lowering the groundwater level. If this approach is not effective or practical, other means, such as well-points may be used to lower the surrounding groundwater table.

### 5.3 Underdrain Construction

Once excavated to design subgrade, an underdrain shall be installed. The underdrain consists of a double-sided geocomposite installed along the excavated sideslope and toe drains. Toe drains are 2-foot wide by 2-foot deep trenches installed along the toe of excavation with a 4-inch ADS N-12 corrugated HDPE (or equal) perforated pipe surrounded by drainage material, wrapped with filter geotextile. The toe drains will direct groundwater to an underdrain sump located directly beneath the leachate collection sump. Pumps sized to accommodate the designed groundwater flows from the underdrain system will be installed within a riser pipe with controls to allow automatic operation. The underdrain sump riser pipe shall exit the cell in such a manner so as not to penetrate the alternative liner within the planned limits of the waste disposal. Underdrain material specifications shall be that of materials used in the leachate collection system.

### 5.4 Alternative Liner Stability During Construction

30 TAC §330.337(f)(1)

The dewatering system will prevent excessive pressure head from developing beneath the alternative liner during construction because the double-sided geocomposite and toe drains have been designed to accommodate the maximum anticipated inflow of groundwater as presented in Appendix III3E-2, Dewatering System Calculations. During construction activities, the POR shall evaluate the groundwater level and confirm the underdrain design.

The POR shall observe the liner subgrade, liner, and leachate collection system materials for the presence of groundwater seepage during construction to verify the subgrade is suitable for liner system construction. The entire subgrade shall be observed during excavation, and the occurrence of the following shall be noted:

- Groundwater seepage within the subgrade.
- Softening of the subgrade surface resulting from groundwater seepage.
- Softness or sheen in the secondary features resulting from groundwater seepage.

In each GLER, observations and subgrade evaluations performed by the POR will be presented to verify that the subgrade soils are suitable for liner system construction.

### 5.5 Alternative Liner Stability During Filling and Operation

30 TAC §330.337(c)

After the waste management unit is constructed and approved to receive waste, landfill operators shall ensure the stability of the alternative liner by maintaining continuous operation of the dewatering system. The underdrain will be in operation until sufficient ballast is in place to offset hydrostatic uplift.

## 6.0 BALLAST REQUIREMENTS

To offset hydrostatic uplift, the weight of the alternative liner and the waste placed above it will provide the ballast (weight) to protect the liner system from uplift forces from groundwater. The ballast counteracting the hydrostatic forces include the soil materials from the leachate collection system components, the protective cover, waste above the liner and leachate collection system, and the soil materials from the final cover. The weight of the geosynthetic components of the leachate collection system and any geosynthetic components of the final cover is considered negligible.

### 6.1 Seasonal High Groundwater Table

30 TAC §330.337(i)

To evaluate the ballast required to offset hydrostatic uplift, groundwater levels within the waste management unit must be assessed. Groundwater level data are presented in Appendix III3F-2. Using groundwater level data provided in III4E, Historic Groundwater Levels. Figures III3F-3A and III3F-3B present the seasonal high groundwater contours elevations.

For each new increment of liner construction, the POR shall reevaluate the seasonal high groundwater table for the construction area as part of the Geosynthetic Liner Evaluation Report (GLER) submittal. The seasonal high water table shall be adjusted upward, if necessary, as additional groundwater elevation data become available.

### 6.2 Ballast Thickness Calculations

The required ballast thickness will be calculated using the following procedures:

1. Determine the hydrostatic uplift pressure,  $P$ , acting on the alternative liner from the assumed seasonal high groundwater table, and the resistance provided by the ballast:

Determine the maximum hydrostatic uplift pressure,  $P$ , acting on the geomembrane component of the alternative liner using the unit weight of water,  $\gamma_w$ , times the vertical distance from the base of the alternative liner to the seasonal high water table,  $H_{wt}$ .

$$P = \gamma_w H_{wt}$$

The resisting pressure,  $R_N$ , provided by the ballast is equal to the normal component of the sum of the unit weights of each ballast component,  $\gamma_i$ , times their respective vertical thickness,  $T_i$ , as shown in the following equation:

$$R_N = \sum(\gamma_i T_i) \cos^2 \beta$$

Where  $\beta$  is the angle between the slope of alternative liner and horizontal.

2. The equations for  $R$  and  $P$  are solved for equilibrium to find the thickness of ballast required to counteract the calculated water pressure.

The safety factors indicated in the regulations, either 1.2 or 1.5 depending on the type and configuration of ballast used, are incorporated into the above referenced equations by multiplying by the appropriate factor. If only soil ballast is used, a factor of 1.2 is used in the equation, and if some combination of soil layers and waste is used as ballast, a factor of 1.5 is used.

$$1.2P = R \quad \text{or} \quad 1.5P = R$$

When the equations for  $R$  and  $P$  are input, the required waste thickness, and/or required ballast thickness, is then determined. The equations can be solved for any location within or near an excavation where the piezometric profile is known or can be estimated.

The example ballast calculation are presented in Appendix III3E-1, Sufficient Ballast Calculations.

In each GLER, waste for ballast calculations will be provided to determine the minimum amount of waste needed, if any, to offset the hydrostatic uplift from the seasonal high water table.

### 6.3 Ballast Verification

30 TAC §330.337(f)(2)

When the operator determines that adequate ballast is in place, the amount of ballast must be verified to be sufficient to offset hydrostatic uplift on the alternative liner by a factor of 1.5 per Appendix III3E-1, Sufficient Ballast Calculations. The measures and tests used to verify that any ballast including waste are sufficient to meet the established ballast criteria include surveyed elevations to determine component thickness and density to determine component weight. In addition, the seasonal high water table shall be adjusted upward, if necessary, as additional groundwater elevation data become available.

### 7.0 MARKING AND IDENTIFYING EVALUATED AREAS

In accordance with 30 TAC §330.143(b)(1) and (6), markers shall be placed so that all areas for which the GLER have been submitted and approved by the TCEQ are readily identifiable. Such markers are to provide site workers with immediate knowledge of the extent of approved disposal areas and shall be placed in accordance with the Site Operating Plan.

Markers shall be metal, wooden, or recycled posts and shall extend at least 6 feet above ground level. Markers shall not be obscured by vegetation and shall be placed so that they are not destroyed during operations. Sufficient intermediate markers shall be installed to show the required boundary. Lost markers shall be promptly replaced. Limits of the evaluated area shall be referenced to the site grid system. Markers shall not be placed inside the evaluated area. Markers shall be color coded in accordance with 30 TAC §330.143(b)(1). GLER markers shall be red in color.

## 8.0 DOCUMENTATION AND REPORTING

The use of applicable TCEQ forms is required. Forms for liners and leachate collection systems and forms for excavation dewatering and liner ballast is posted on the TCEQ website.

### 8.1 Geosynthetic Liner Evaluation Report

30 TAC §330.341

A Geosynthetic Liner Evaluation Report (GLER) includes documentation of cell construction including geosynthetic clay liner installation, geomembrane installation, and leachate collection system installation including protective cover soil. Prior to the disposal of solid waste in any cell, or on any area, excavation, or unprotected surface, a GLER shall be submitted to the TCEQ.

Each GLER shall be submitted in triplicate (including all attachments) to the executive director and shall be prepared in accordance with the methods and procedures contained in this LQCP. If the executive director provides no response, either written or verbal, within 14 days of receipt, the owner or operator may continue facility construction or operation.

If the executive director determines that a report is incomplete or that the test data provided are insufficient to support the evaluation conclusions, additional test data or other information may be required, and use of the cell or disposal area will not be allowed until such additional data are received, reviewed, and accepted. Each report must be signed and, where applicable, sealed by the POR performing the evaluation and counter-signed by the facility operator or an authorized representative.

The construction documentation provided in the GLER will contain a narrative describing the work conducted and testing programs required by the LQCP, "as-built" or record drawings, and appendices of field and laboratory data. The GLER will contain or discuss the information included in Table III3F-6, GLER Content at a minimum.

**Table III3F-6: GLER Content**

<b>Geosynthetic Clay Liner</b>	Roll shipment and receipt information
	Manufacturer's quality control certificates and results
	Storage and handling information
	Conformance test sampling and test results
	Subgrade acceptance
	Anchor trench preparation and backfilling
	Panel deployment, identification, and placement
	Equipment placed or operated on GCL
	100 percent visual inspection for defects, damage, etc.
	Seaming methods

	Repairs, including patch size and shape
<b>Geomembrane Liner</b>	Roll shipment and receipt information
	Manufacturer's quality control certificates and results
	Storage and handling information
	Conformance test sampling and test results
	Seamer's names and resumes of experience and qualifications
	Subgrade acceptance
	Anchor trench preparation and backfilling
	Panel deployment, identification, and placement
	Seam preparation, orientation, and identification
	Equipment placed or operated on geomembrane
	100 percent visual inspection for defects, damage, etc.
	Trial seam tests for each combination of seaming equipment and personnel
	Seaming methods, times, temperature, and equipment shutdowns and startups
	Continuous 100 percent non-destructive seam testing, methods, criteria, and results
	Destructive testing methods, criteria, and results
Repairs, including preparation and procedures, failure delineation, patch size and shape, and retesting	
Material properties and placement of drainage materials and protective cover	
<b>Record Drawings</b>	Phase layout plan
	Location of the subject cell with GLER markers
	Previous filled and active areas
	As-built GCL panel layout drawings, showing locations of patches and repairs
	As-built geomembrane panel layout drawings showing location of destructive test samples, patches, and repairs
	As-built drawings showing elevations of protective cover to confirm its thickness
<b>Ballast Evaluation</b>	Waste for ballast calculations will be provided to determine the minimum amount of waste needed, if any, to offset the hydrostatic uplift from the seasonal high water table.

## 8.2 Interim Status Report

An Interim Status Report (ISR) should be provided to the TCEQ for portions of a liner system that remain uncovered with waste for more than six months from the date that the protective cover was applied, and the area shall be reevaluated by a POR.

## 8.3 Ballast Evaluation Report

30 TAC §330.337(j)

A Ballast Evaluation Report (BER) must be submitted to the TCEQ when the ballast verification demonstrates that further ballasting or dewatering is no longer necessary. If the TCEQ provides no response within 14 days of the date of receipt, dewatering or further ballasting operations may be

discontinued. The BER shall include a statement verifying the alternative liner did not undergo uplift during construction, certification that ballast met the criteria established in this LQCP, and signed and sealed by an independent licensed professional engineer performing the evaluation and signature of the facility operator or his authorized representative. The following information will be included, as applicable, with the BER.

- A summary of in-place density measurements will be presented verifying that the weight of the leachate collection system, protective cover, ballast (if any), and cover required as ballast complied with the calculations.
- The top of protective cover will be surveyed after installation to assure that the liner and leachate collection system did not undergo uplift prior to waste placement.
- Water level measurements obtained from appropriate site piezometer and monitor wells near each excavation area will be presented verifying that the groundwater levels do not exceed the design seasonal high water table. If the observed water levels exceed the design seasonal high water level, the ballast calculations will be adjusted accordingly.
- A TCEQ Waste-as-Ballast Placement Record form completed by the landfill manager or designated representative will be presented confirming that the waste material in the first 5 feet of waste was free of brush and large bulky items, daily operations of the pressure relief/underdrain system (if required) were completed, and a wheeled trash compactor having a minimum weight of 40,000 pounds was used to place waste.



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 4

# GEOLOGY REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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July 2017  
Revised: November 2017

Project No. 1401491



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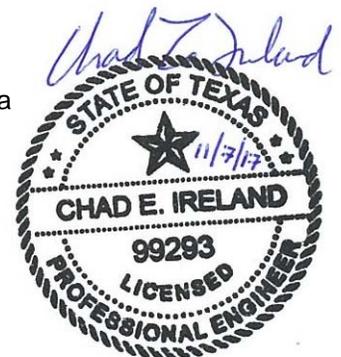
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## **EXECUTIVE SUMMARY**

This Geology Report is prepared and signed by a qualified groundwater scientist. Previously prepared documents supplement this report as necessary to provide the requested information. Sources and references for information are provided. This report summarizes available data related to regional geology and local geology and aquifers in the vicinity of the facility in accordance with 30 TAC §330.63(e). Based on a review of information gathered and on the results of subsurface, geotechnical, and hydrogeological investigations, the Edinburg Regional Disposal Facility is suitable for its continued operation and development as a municipal solid waste disposal facility.

## 1.0 REGIONAL GEOLOGY

The Gulf of Mexico (GOM) is a semi-enclosed ocean basin surrounded by continental shelves and coastal plains. The GOM's depositional system is a three-dimensional body of sediment deposited in a contiguous suite of process-related sedimentary environments and each sedimentary environment produces specific facies / rock types. The stratigraphy along the GOM is composed of fluvial depositional systems created by regionally cyclic episodes of focused deposition and progradation of the shoreline followed by non-deposition and transgression of the coastal plain. The timing and cyclicity of progradational and transgressive events depends upon the interplay of sediment supply, subsidence, and sea-level change caused by both tectonic development and continental glaciation (Young, 2010).

In the Lower Rio Grande Valley (LRGV) the depositional stratigraphy described as the Gulf Coast Aquifer (GCA) are Quaternary and Neogene period sediments consisting primarily of fine to medium-grained materials deposited by fluvial and eolian processes. The outcrop of each progressively older, underlying unit is found to the west of the younger, overlying unit. Because of differential subsidence, units typically thicken and dip toward the coastline of the GOM.

### 1.1 Geologic Map

30 TAC §330.63(e)(1)(A)

Figure III4-1, Geologic Map presents the McAllen-Brownsville Sheet, Geologic Atlas of Texas prepared by the Bureau of Economic Geology. This map presents geologic units and structural features within the vicinity of the facility with text describing the stratigraphy and lithology of the map units. The facility is located on Neogene sediment overlain by Quaternary (Holocene) windblown (eolian) sediment.

### 1.2 Generalized Stratigraphic Column

30 TAC §330.63(e)(1)(B)

The generalized stratigraphic column of the area beneath the facility is presented to a depth of approximately 1,600 ft-bgs, which is the base of the Evangeline Aquifer. Based on Figure III4-1, Geologic Map and Figure III4-2, Regional Stratigraphic Cross-Section, the Goliad Formation outcrops in the vicinity and is overlain by a veneer of Holocene eolian deposits. A description of the stratigraphy, including geologic age, lithology including variations, thickness, depth, geometry, hydraulic conductivity, and depositional setting of each geologic unit, as available through current geologic information, is included in Table III4-1, Stratigraphic Units Underlying Facility.

**Table III4-1: Stratigraphic Units Underlying Facility**

System	Series	Age (M.Y.)	Stratigraphic Units	Lithology	Approx. Thickness (ft)	Approx. Depth (ft-bgs)	Geometry	Hydraulic Conductivity	Depositional Facies
Quaternary	Holocene	0.02	Stabilized Sand Dune Deposits	Sand; Silt	0-30	10	Sand sheets and dunes	Moderate to High	Eolian
Neogene	Miocene	4.4	Upper Goliad	Clay or Mud; Sandstone; Mudstone, Carbonate, Limestone, Conglomerate	400	400	Large planar, cross bedding, and lamination.	Moderate	Fluvial / Meander belt
		11.3	Lower Goliad		550	950			Dips east towards GOM coastline; units thicken down dip
		13.3	Upper Lagarto	Sandstone	650	1600			
		15.6	Middle Lagarto	Clay or Mud	700	2300	Low		

(Table compiled after Baker, 1979; Chowdhury and Mace, 2007; and Young et al., 2010)

### 1.2.1 Quaternary System

Surface deposits in the vicinity are primarily Holocene-age, eolian (windblown) deposits of the Quaternary Period. The eolian deposits are predominantly sand dunes, stabilized by vegetation, although recent blowout features are not uncommon. The dunes characteristically have moderate to very high permeability, low to moderate water-holding capacity, low shrink and swell potential, good to fair drainage, high shear strength, low plasticity, and a shallow water table where present (Barnes, 1976). Within the site, a thin veneer of eolian deposits exists across most of the area, except the north-eastern to south-eastern portion as depicted on Figure III4-1, Geologic Map.

### 1.2.2 Neogene System

The Neogene system underlies the Quaternary deposits and is divided into two series, the Pliocene and the Miocene. Pliocene sediments from youngest to older consist of Beaumont, Lissie, and Willis formations. Miocene sediments underlying the facility from youngest to older consist the Goliad and Lagarto Formations.

#### 1.2.2.1 Goliad Formation

The Goliad Formation underlying the facility is further divided into upper and lower units. This formation includes fluvial deposits exhibiting large planar and trough crossbedding and horizontal lamination.

Deposits include successions of clay, marl, and caliche. Base elevations and thicknesses for the upper and lower Goliad Formation are presented on Figures III4-3 and III4-4 respectively.

The Upper Goliad's depositional facies is fluvial / meander belt. Fluvial channel-fill facies are composed mainly of medium- to coarse-grained sand and gravel, displaying large-scale cross-bedding. Inter-channel facies include sandy crevasse splays, and muddy floodplain and playa lake facies formed where flood waters breached channel levees and deposited broad aprons of sandy sediment on the floodplain. These facies surround channel-fill and crevasse-splay facies and were deposited across inter-channel areas during floods. Mottled red clays dominate floodplain successions, and secondary calichification and pedogenesis are pervasive. The Lower Goliad's depositional facies is lower coastal plain fluvial / coastal which includes small deltaic and barrier-lagoon depositional systems. Channel belt composition is sandy sediment whereas interchannel composition is calcareous mudstone (Young, 2010).

### 1.2.2.2 Lagarto Formation

The Lagarto Formation underlies the Goliad Formation and is divided into upper, middle, and lower units. Base elevations and thicknesses for the upper and middle Lagarto Formation are presented on Figures III4-5 and III4-6 respectively. The depositional facies underlying the facility is lower coastal plain fluvial / coastal which includes small deltaic and barrier-lagoon depositional systems. The Lagarto Formation represents a fluvial-deltaic depositional episode in which the upper Lagarto forms the upper progradational part, and the middle and lower Lagarto forms the lower retrogradational part. Therefore, the upper part is generally sand-rich, whereas the middle and lower parts are relatively more mud-rich. The mud-rich parts of the Lagarto are referred to as the Burkeville Aquitard which underlies the Evangeline Aquifer.

## **2.0 ACTIVE GEOLOGIC PROCESSES**

30 TAC §330.63(e)(2)

A description of active geologic processes in the vicinity of the facility including identification of any faults and subsidence in the area of the facility is discussed in the following sections.

### **2.1 Erosion**

Erosion potential caused by surface water processes such as overland flow, channeling, gullyng, and wind has been evaluated.

#### **2.1.1 Soils**

Figure III4-7, Soils Map presents the distribution of six soil series, predominantly loamy, located across the facility according to the Soil Survey of Hidalgo County, Texas (Jacobs, 1981). These soil series include: the Brennan, Hebbronville (#22, #23, and #24), Hidalgo, Racombs, and Willacy Series. Table III4-2, Soil

Types lists sixteen soil types within the facility boundary, percentage of area covered, and potential for water and wind erosion.

**Table III4-2: Soil Types**

Soil	Unit Name	Area Covered <sup>1</sup> (%)	Water Erosion Hazard	Wind Blowing Hazard
3	Brennan fine sandy loam, 0 to 1 percent slopes	7.8	Slight	Moderate
9	Delfina loamy fine sand, warm, 0 to 2 percent slopes	4.2	Moderate	Severe
16	Hargill fine sandy loam, 0 to 1 percent slopes	9.5	Slight	Moderate
17	Hargill fine sandy loam, 1 to 3 percent slopes	6.6	Moderate	Moderate
22	Hebbronville sandy loam, 0 to 1 percent slopes	7.7	Slight	Moderate
23	Hebbronville sandy loam, 1 to 3 percent slopes	11.7	Moderate	Moderate
24	Hebbronville sandy loam, 3 to 5 percent slopes	8.9	Severe	Moderate
25	Hidalgo fine sandy loam, 0 to 1 percent slopes	9.1	Slight	Moderate
48	Racombes sandy clay loam	5.1	Slight	Slight
60	Rio clay loam	1.2	Moderate	Slight
70	Willacy fine sandy loam, 0 to 1 percent slopes	19.1	Slight	Moderate
71	Willacy fine sandy loam, 1 to 3 percent slopes	4.0	Moderate	Moderate

Notes:

- The percentages do not add up to 100% due to part of the area being occupied by the landfill and ponds that are not accounted for in the data. The data is obtained from the NRCS Web Soil Survey Tool: <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>

### 2.1.2 Surface Water Erosion

Surface water erosion will not adversely affect the operation of the facility. Gullying and channeling are uncommon in the area because of high infiltration rates and little relief. Soils in the area are well drained and have slopes of less than or equal to 5.2% (Jacobs et al., 1981). Sheet flow only occurs during very heavy rainfall as evident by lack of natural drainage features on or near the facility.

The soil types located in the facility are either slightly or moderately erodible by surface water with an exception of Hebbronville #24. This soil, located in the middle of the facility, exhibits severe water erosion potential and covers approximately nine percent of the facility. Most of this soil will be removed as development of the facility progresses.

An erosion and sedimentation control plan is included in Part III2, Surface Water Drainage Report of this application was developed to mitigate erosion potential along landfill embankments and sedimentation in surface water drainage features. Erosion and sediment controls will be implemented during the construction and operational periods of the facility.

### **2.1.3 Wind Erosion**

Wind erosion will not adversely affect the operation of the facility. Prevailing winds can erode surface sediments in the area (Barnes, 1976). The soil types located in the facility are either slightly or moderately erodible by wind with an exception of Delfina #9. This soil, located in the south east corner of the facility, exhibits severe wind erosion potential and covers approximately four percent of the facility. This soil will be removed as development of the facility progresses for construction of a future perimeter berm, access road, and storm water pond.

## **2.2 Active Geological Faulting Assessment**

30 TAC §330.555(b)

A location restriction criterion requires that new municipal solid waste landfill units and lateral expansions shall not be located within 200 feet of a fault that has had displacement in Holocene time (representing the most recent 10,000 years), referred to herein as an active fault. Sites located within areas that may be subject to differential subsidence or active geological faulting must include detailed fault studies. When an active fault is known to exist within 1/2 mile of the site, the site must be investigated for unknown faults. There is no evidence of active geological faulting or differential subsidence that would impair the integrity of any landfill component.

Salt domes cause much of the recent fault activity in the Gulf Coastal Plains. In Hidalgo County, salt domes are rare because the Jurassic salt layer, found throughout the Gulf Coast, is thin (Worral & Snelson, 1989). This occurrence has reduced recent fault activity to a minimum in Hidalgo County. The Geologic Atlas of Texas (McAllen-Brownsville Sheet) presented in Figure III4-1, Geology Map and Texas Water Development Board (TWDB) Reports (Young et al. 2010 and Mace et al. 2006) showing faults, were reviewed to determine the presence of faults within the vicinity. Based on the review of the maps and published literature, there are no faults or surface expression of Holocene faults indicated within a one-half-mile radius of the facility. As depicted on Figure III4-1, Geologic Map there are no mapped surface expressions of active or inactive faults located within at least a five-mile-radius of the facility.

## **2.3 Seismic Impact Zone Assessment**

30 TAC §330.557

A location restriction criterion requires new municipal solid waste landfill units and lateral expansions shall not be located in seismic impact zones. A seismic impact zone is defined as an area with a 10-percent or greater probability that the maximum horizontal acceleration in lithified earth material, expressed as a percentage of the earth's gravitational pull (g), will exceed 0.10 g in 250 years.

The 2014 U.S. Geological Survey (USGS) National Seismic Hazard Maps display earthquake ground motions for various probability levels across the United States up to 50 years. According to the USGS, ground motion values having a 2% probability of exceedance in 50 years should be approximately the same as those having 10% probability of being exceeded in 250 years. Figure III4-8, Seismic Impact Zone Map shows the maximum horizontal acceleration is approximately 0.02g at the location of the facility. Because the maximum horizontal acceleration is less than 0.1g, the facility is not located in a seismic impact zone.

## **2.4 Unstable Area Assessment**

30 TAC §330.559

An unstable area is defined to be a location that is susceptible to natural or human-induced events or forces capable of impairing the integrity of some or all of a landfill's structural components responsible for preventing releases from the landfill; unstable areas can include poor foundation conditions, areas susceptible to mass movement, and karst terrains. No unstable areas exist within the vicinity of the facility that would impair the integrity of any landfill components.

### **2.4.1 Local Soil Conditions**

The soils within vicinity of the facility are predominantly sandy loam and have similar soil properties. They are well drained because of high infiltration rates and lack natural drainage features. No significant differential settling is anticipated.

### **2.4.2 Local Geologic or Geomorphologic Features**

The lithology within the vicinity of the facility is moderately consistent and no indication of any karst conditions, active geological faulting, or presence of salt domes; therefore no differential subsidence is anticipated.

### **2.4.3 Local Human-Made Features**

In Part III3, Waste Management Unit Design analyses were performed to assess the performance of the landfill with respect to slope stability and settlement using very conservative assumptions. Results of the analyses indicate slope stability and long-term settlement would not impair the performance of the leachate collection system during landfill.

## **3.0 EVANGELINE AQUIFER**

30 TAC §330.63(e)(3)(A)

Significant regional aquifers in the vicinity of the facility are collectively grouped as the Gulf Coast Aquifer (GCA), which consists of the following aquifers listed youngest to oldest: the Chicot, the Evangeline, and

the Jasper (Chowdhury and Mace 2007). Figure III4-9, Gulf Coast Aquifers in Lower Rio Grande Valley shows the outcrop areas of the different aquifers in the region.

Underlying the facility is the Evangeline Aquifer which overlies the Burkeville Confining Unit; their association with geologic units is presented in Table III4-3, Hydrogeologic Units Underlying the Facility.

**Table III4-3: Hydrogeologic Units Underlying the Facility**

System	Series	Stratigraphic Units	Lithology	Approx. Thickness (ft)	Approx. Depth (ft-bgs)	Hydro-stratigraphy	Water Bearing Properties
Quaternary	Holocene	Stabilized Sand Dune Deposits	Sand; Silt	0-30	10	Evangeline Aquifer	Moderate to very high permeability, low to moderate water-holding capacity.
Neogene	Miocene	Upper Goliad	Clay or Mud; Sandstone; Mudstone, Carbonate, Limestone, Conglomerate	400	400		Provides water for domestic and irrigation uses.
		Lower Goliad		550	950		
		Upper Lagarto	Sandstone	650	1600		
		Middle Lagarto	Clay or Mud	700	2300	Burkeville Confining Unit	Regional aquitard, low permeability.

(Table compiled after Baker, 1979; Chowdhury and Mace, 2007; and Young et al., 2010)

### 3.1 Composition

30 TAC §330.63(e)(3)(B)

The Evangeline Aquifer is composed primarily of the Goliad Sand, but may also contain sections of sand and clay from the Upper Lagarto Formation. It is approximately 1,600 feet thick under the facility and dips towards the coast approaching thicknesses greater than 2,300 ft. Sand fractions in the Evangeline are observed to range from less than 0.4 to greater than 0.6 (Young et al., 2010).

### 3.2 Hydraulic Properties

30 TAC §330.63(e)(3)(C)

Transmissivity values are observed to range from 3,000 to 15,000 ft<sup>2</sup>/day (Chowdhury and Mace, 2007). Average horizontal and vertical hydraulic conductivities are 80 feet/day and 1 x 10<sup>-3</sup> feet/day, for horizontal

and vertical, respectively (Ryder, 1988). The storativity of the Evangeline Aquifer ranges from 0.001 to 0.01 in the unconfined areas and 0.0004 to 0.001 in the confined areas (Chowdhury and Mace, 2007).

### 3.3 Under Water Table or Artesian Conditions

30 TAC §330.63(e)(3)(D)

The Evangeline Aquifer generally exists under water table conditions, however successions of clay may cause portions to behave as a semi-confined aquifer.

### 3.4 Hydraulic Connectivity

30 TAC §330.63(e)(3)(E)

The Evangeline Aquifer is hydraulically bounded by the underlying Burkeville Confining Unit, located at a depth of approximately 1600 ft, which separates it from the underlying Jasper Aquifer. Within the Goliad's sand-dominated fluvial systems, sand bodies are highly interconnected (Young, 2010).

### 3.5 Regional Water-Table Potentiometric Surface Maps

30 TAC §330.63(e)(3)(F)

Figure III4-10, Evangeline Aquifer Potentiometric Surface and Hydraulic Conductivity presents a regional potentiometric surface map which demonstrates the regional groundwater flow direction to the east/southeast.

### 3.6 Rate of Groundwater Flow

30 TAC §330.63(e)(3)(G)

The aquifers of the GCA dip towards the coast and groundwater flow is towards the Gulf of Mexico. The estimated average rate of horizontal groundwater flow for the Evangeline Aquifer is 80 ft/day (Ryder, 1988).

### 3.7 Total Dissolved Solids

30 TAC §330.63(e)(3)(H)

Typical range of values for total dissolved solids content of groundwater, mineral constituents dissolved from rocks and soils within the Evangeline Aquifer is 632 – 8,774 mg/L with a 0.0 to 0.2 fraction of aquifer thickness that is fresh water (Young, 2010). A general classification of water based on dissolved solids content is as follows; waters containing less than 1,000 mg/L of dissolved solids are considered fresh; 1,000 to 3,000 mg/L, slightly saline; 3,000 to 10,000 mg/L, moderately saline; 10,000 to 35,000 mg/L, very saline, and more than 35,000 mg/L, brine (Winslow and Kister, 1956, p.5)

### 3.8 Areas of Recharge

30 TAC §330.63(e)(3)(I)

The source of the water which recharges the associated hydrostratigraphic units of the GCA is from precipitation directly onto outcrops, discharging surface water in the Rio Grande and Arroyo Colorado Rivers, and irrigation return flow. According to Figure III4-9, Gulf Coast Aquifers in Lower Rio Grande Valley, the facility is located in a recharge area for the Chicot Aquifer. Figure III4-1, Geologic Map demonstrates Holocene-age eolian deposits overlying the Goliad Formation of the Evangeline Aquifer and the Lissie Formation of the Chicot Aquifer within a five-mile radius of the facility. Therefore, areas within a five-mile radius recharge both the Chicot and Evangeline Aquifers.

### 3.9 Local Groundwater Use

30 TAC §330.63(e)(3)(J)

The Rio Grande River is the primary source of domestic water in the Lower Rio Grande Valley. When groundwater is used, it generally comes from the thin layer of the Chicot aquifer, if present, or upper portions of the Evangeline aquifer. Groundwater wells within a one-mile-radius of the facility were located based on a water well database search of located wells from the Texas Water Development Board (TWDB) and on information supplied by the Red Sands Groundwater Conservation District (RSGCD). Figure III4-11, Water Well Location Map depicts approximate water well locations.

The TWDB database search identified six located water wells within a one-mile-radius of the facility summarized in Table III4-4A, Water Well Locations within One-Mile-Radius Provided by TWDB. From available screened depth information, total depths of these water wells range from 74 ft to 1250 ft and extend into the upper parts of the Evangeline Aquifer. In addition to the TWDB database search, RSGCD provided approximate locations for six additional water wells within a one-mile-radius of the facility summarized in Table III4-4B, Water Well Locations within One-Mile-Radius Provided by RSGCD. The locations of these additional wells or records could not be verified.

**Table III4-4A: Water Well Locations within One-Mile-Radius Provided by TWDB**

State Well Number	Map ID <sup>1</sup>	Latitude	Longitude	Surface Elev. (ft)	Total Depth (ft)	Screen Interval (ft)	Approx. Distance from site <sup>2</sup> (ft)	Water Use <sup>3</sup>
8739901	WW-1	26°24'06"N	98°08'16"W	86	258	NA	1,440	Domestic (P) Stock (S)
8739902	WW-2	26°23'41"N	98°08'29"W	84	240	160-240	2,230	Domestic (P) Stock (S)
8739903	WW-3	26°23'36"N	98°08'31"W	83	1125	NA	2,340	Irrigation

State Well Number	Map ID <sup>1</sup>	Latitude	Longitude	Surface Elev. (ft)	Total Depth (ft)	Screen Interval (ft)	Approx. Distance from site <sup>2</sup> (ft)	Water Use <sup>3</sup>
8740701	WW-4	26°24'48"N	98°06'25"W	87	223	124-155	4,740	Stock
8740702	WW-5	26°24'17"N	98°06'29"W	89	74	185-216	2,200	Stock
8740703	WW-6	26°24'59"N	98°06'59"W	101	1250	NA	5,150	Irrigation

1. Map ID as shown on Figure III4-7, Water Wells
2. Distances are estimated to nearest facility property boundary
3. (P) – primary water use; (S) – secondary water use (obtained from well logs)
4. NA – Information not available

**Table III4-4B: Water Well Locations within One-Mile-Radius Provided by RSGCD**

Well Reference/Owner Name	Map ID <sup>1</sup>	Latitude <sup>2</sup>	Longitude <sup>2</sup>	Approx. Distance from site <sup>3</sup> (ft)
E.B. Guerra Elementary School	WW-7	26°24'07"N	98°08'57"W	5,110
Garza Well	WW-8	26°24'04"N	98°08'50"W	4,480
Chandler Well	WW-9	26°24'07"N	98°08'26"W	2,390
Labus Water Well	WW-10	26°24'01"N	98°08'27"W	2,350
Gin Well	WW-11	26°24'29"N	98°08'14"W	3,200
Neal Well	WW-12	26°24'45"N	98°08'10"W	4,530

1. Map ID as shown on Figure III4-7, Water Wells
2. Well locations are approximately estimated based on hand-marked map provided by RSGCD, dated March 18, 2016
3. Distances are estimated to nearest facility property boundary.
4. Screened interval information of water wells from RSGCD are not available.

The facility's engineered design and operational groundwater monitoring mitigate potential impacts on groundwater use within the vicinity. The facility's waste disposal units are constructed with a low-permeability geosynthetic lining system to prevent potential contaminant transport into the groundwater. In an unlikely event contaminants are released, the facility's groundwater monitoring system will detect the release and corrective measures will be implemented. In addition, the closest water well has over 1,400 ft of separation from the facility property boundary; therefore, any contaminants will be attenuated or remediated prior to potential impacts on groundwater use.

#### 4.0 SUBSURFACE INVESTIGATION

30 TAC §330.63(e)(4)

The subsurface investigation at the facility includes a description of all borings drilled on site to test soils and characterize groundwater. Geologic strata have been characterized to depths of up to 100 feet below ground surface from the current and previous subsurface investigations.

## 4.1 Soil Boring Plan

30 TAC §330.63(e)(4)

Presented in Appendix III4A, Soil Boring Plan (SBP) including locations and depths of all proposed borings for the expansion area was submitted to the TCEQ and approved prior to initiation of the subsurface investigation.

### 4.1.1 Number of Borings

30 TAC §330.63(e)(4)(A)

The SBP proposed 35 borings, a sufficient number of borings to establish subsurface stratigraphy and to determine geotechnical properties of the soils beneath the facility. The number of borings were determined based on general characteristics of the facility and on the heterogeneity of subsurface materials analyzed from previously performed subsurface investigations.

### 4.1.2 Depth of Borings

30 TAC §330.63(e)(4)(B)

The approved SBP proposed borings that are sufficiently deep enough to allow identification of the uppermost aquifer and underlying hydraulically interconnected aquifers. They penetrate the uppermost aquifer and are deep enough to identify the aquiclude at the lower boundary. All the borings are at least five feet deeper than the elevation of the deepest excavation, 70 ft-msl, and 18 of the 35 borings are at least thirty feet below the deepest excavation.

### 4.1.3 Established Field Exploration Methods

30 TAC §330.63(e)(4)(C)

All borings were conducted in accordance with established field exploration methods detailed in the approved SBP. The subsurface investigation, borings, and plugging and abandonment were conducted in accordance with applicable rules in 16 TAC §76 – Water Well Drillers and Water Well Pump Installers including the preparation and submittal of well installation and plugging reports. The drilling and sampling program of the SBP includes drilling methods, sampling plan, and boring log documentation.

## 4.2 Soil Boring Logs

30 TAC §330.63(e)(4)

Appendix III4B, Soil Boring Logs include a boring logs from the current and previous subsurface investigations. Boring logs from the current investigation outlined in the SBP include detailed description of materials encountered including any discontinuities such as fractures, fissures, slickensides, lenses, or

seams. Each boring is presented in the form of a log that contains, at a minimum, the boring number; surface elevation and location coordinates; and a columnar section with text showing the elevation of all contacts between soil and rock layers, description of each layer using the unified soil classification, color, degree of compaction, and moisture content. A key explaining the symbols used on the boring logs and the classification terminology for soil type, consistency, and structure is provided. Water levels observed during drilling are indicated on the boring logs.

The current and previous subsurface investigations of the geology, geotechnical properties, and hydrogeology of the facility have resulted in a total of 99 borings including piezometers and monitoring wells. Figure III4-12A, Boring Location Map depicts the surveyed locations and elevation of all borings.

#### 4.2.1 Previous Subsurface Investigations

The following previous investigations were prepared for the site in support of previous permitting activities:

- 1976 – Langley-Pittman Lab drilled a total of six borings (No.1 through No.6) within the then existing 100-acre facility, to characterize the original site. Borings were advanced to a depth of 40 ft. bgs.
- 1993 – Borings B-1 through B-5 were drilled by Professional Services Industries, Inc. (PSI) in 1993. B-5 was drilled to a depth of 100 feet BGS, while the each of the other boreholes went to a depth of 50 feet. This investigation included standard penetration test values (SPT) and pocket penetrometer shear strength values obtained during the field investigation. Further, index texting was performed in the laboratory for soil classification. This investigation was followed by the installation of groundwater monitoring wells MW-1 through MW-4 adjacent to B-1 to B-4.
- 1996 – Five soil borings, SB-01 through SB-05 were advanced to characterize the western portion of the contemporary expansion area during the geotechnical investigation conducted by Rust Environment and Infrastructure as part of the 100-acre expansion. Boreholes SB-01 to SB-04 were 40 feet deep, while SB-05 was drilled to a depth of 100 feet at the middle of the facility. SPT and pocket penetrometer values were obtained during the field investigation. Laboratory testing was performed to classify the soil and determine its permeability.
- 1996 – Four monitoring wells – MW-5 through MW-8 - were installed, each to a depth of 35 feet BGS, by Raba-Kistner-Brytest Consultants. The wells were installed to complete the groundwater monitoring system proposed in Permit No. 956A.
- 1999 – As part of the Permit Amendment No. 956B for landfill expansion, fourteen borings G-1 through G-14 were drilled by PSI. Golder performed oversight, logging, and laboratory testing. Thirteen of these borings were drilled to at least 30 feet, while the shallowest borings extended to at least 5 feet below the lowest excavation grades. SPT and pocket penetrometer values were obtained in the field and index tests were performed in the lab for soil classification. In addition permeability tests (ASTM D5084), unconfined compressive strength tests (ASTM D2166) and consolidation tests (ASTM D2435) were performed. In borings G-8 and G-9, groundwater piezometers, P-1 and P-2 were installed.
- 2000 – Geologic Drilling Inc. drilled six monitoring wells – MW-9 through MW-14, and Southern Ecology Management performed oversight and logging. The monitoring well screen intervals determined the depth of the borings.

- 2003 – CCI EnviroDrilling, Inc. plugged and re-installed monitoring wells MW-1 through MW-4. The wells were renamed MW-1R through MW-4R. Golder provided oversight.
- 2004 – EnviroCore, Inc. replaced the damaged MW-3R to installed MW-3RA. Golder provided oversight.
- 2005 – EnviroCore, Inc. installed MW-15 through MW-18 under Golder’s oversight.
- 2009 – Lewis Environmental drilled three new wells – MW-22, MW-23, and MW-24. Several old wells were redrilled/replaced including MW-3A, MW-4A, MW-7R through MW-10R, MW-15R, MW-16R, and MW-18R. Golder provided oversight.
- 2013 – EnviroCore drilled two monitoring wells MWD-6 and MWD-7. Golder provided oversight.

**Table III4-5A: Coordinates and Elevations of Previously Advanced Borings (ft)**

Boring	Northing <sup>2</sup> (ft)	Easting <sup>2</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
Langley-Pitman Testing Lab, 1976 (Soil Borings)					
No.1	16,668,336.87	1,105,717.33	91	40	51
No.2	16,669,135.55	1,105,455.21	86	40	46
No.3	16,669,867.66	1,105,398.98	87	40	47
No.4	16,670,296.17	1,104,238.29	86	40	46
No.5	16,668,738.00	1,104,072.69	91	40	51
No.6	16,668,807.16	1,105,020.81	91	40	51
Professional Services Industries, 1993 (Soil Borings and Monitoring Wells)					
B-1	16,670,435.62	1,104,102.38	85	50	35
B-2	16,668,479.69	1,103,794.80	85	50	35
B-3	16,668,153.82	1,105,849.69	91	50	41
B-4	16,670,034.21	1,106,143.67	88	50	38
B-5	16,669,351.49	1,105,106.22	90	100	-10
MW-1	16,670,435.62	1,104,102.38	85	27	58
MW-2	16,668,479.69	1,103,794.80	86	27	59
MW-3	16,668,153.82	1,105,849.69	90	30	60
MW-4	16,670,034.21	1,106,143.67	88	27	61
Rust Environment & Infrastructure, March 1996 (Soil Borings)					
SB-01	16,669,568.08	1,106,617.13	87	40	47
SB-02	16,668,575.32	1,106,460.78	83	40	43
SB-03	16,668,404.19	1,107,547.38	87	40	47
SB-04	16,669,396.95	1,107,703.73	91	40	51
SB-05	16,669,045.31	1,107,108.28	88	100	-12
Raba-Kistner-Brytest Consultants, December 1996 (Monitoring Wells)					

Boring	Northing <sup>2</sup> (ft)	Easting <sup>2</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
MW-5	16,668,819.18	1,105,953.07	87	35	52
MW-6	16,669,467.10	1,106,057.05	84	35	49
MW-7	16,670,228.55	1,105,449.97	84	35	49
MW-8	16,670,327.25	1,104,791.54	84	35	49
Golder Associates/ PSI, 1999 (Soil Borings and Piezometers)					
G-1	16,670,047.99	1,106,483.70	87	50	37
G-2	16,669,792.20	1,107,218.82	88	50	38
G-3	16,669,634.68	1,108,135.47	96	58	38
G-4	16,669,719.89	1,108,864.82	100	62.5	38
G-5	16,669,445.90	1,107,174.40	88	25	63
G-6	16,669,189.68	1,108,692.02	106	68.5	38
G-7	16,669,169.33	1,106,288.59	83	45	38
G-8 (P-1)	16,668,919.88	1,107,855.10	87	50	37
G-9 (P-2)	16,668,473.27	1,107,013.57	83	45	38
G-10	16,668,500.43	1,108,575.37	98	60	38
G-11	16,668,298.65	1,108,146.76	86	48.5	38
G-12	16,668,075.59	1,106,168.70	88	50	38
G-13	16,668,028.30	1,107,311.54	84	46.5	38
G-14	16,667,706.94	1,108,555.69	87	50	37
Southern Ecology Management/ PSI, 2000 (Monitoring Wells)					
MW-9	16,669,138.78	1,103,896.60	88	37.7	50
MW-10	16,669,758.36	1,104,000.04	89	37.7	51
MW-11	16,670,047.99	1,106,483.70	88	37	51
MW-12	16,668,075.59	1,106,168.70	90	39.2	51
MW-14	16,669,719.89	1,108,864.82	100	55	46
Golder Associates/ CCI EnviroDrilling, Inc., 2003 (Monitoring Wells)					
MW-1R	16,670,499.43	1,104,230.98	85	29.5	55
MW-2R	16,668,462.15	1,103,807.64	87	31.5	55
MW-3R	N/A	N/A	NA	37	NA
MW-4R	16,670,139.26	1,106,060.54	89	37.5	51
Golder Associates/ EnviroCore, Inc., 2004 (Monitoring Well)					
MW-3RA	16,629,881.403	1,093,651.047	92	38	54
Golder Associates/ EnviroCore, Inc., 2005 (Monitoring Wells)					
MW-15	16,669,968.26	1,107,279.30	91	45	46

Boring	Northing <sup>2</sup> (ft)	Easting <sup>2</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
MW-18	16,667,905.72	1,107,198.44	88	36.5	52
Golder Associates/ Lewis Environmental, April 2009 (Monitoring Wells)					
MW-3A	16,668,160.24	1,105,577.78	96	42.5	53
MW-4A	16,670,154.21	1,105,936.63	88	38	49
MW-7R	16,670,243.18	1,105,343.73	86	37	49
MW-8R	16,670,342.18	1,104,749.81	85	37	48
MW-9R	16,669,020.21	1,103,870.99	87	38	50
MW-10R	16,669,614.74	1,103,959.80	88	39	49
MW-15R	16,670,029.73	1,107,082.63	88	37.5	51
MW-16	16,669,910.05	1,107,645.48	86	34	53
MW-18R	16,667,889.53	1,107,351.67	85	33	52
MW-22	16,668,246.95	1,104,990.12	93	39	54
MW-23	16,668,348.50	1,104,397.05	88	28	60
MW-24	16,670,205.18	1,104,058.59	87	37	51
Golder Associates (2013) (Monitoring Wells)					
MWD-6	16,667,942.38	1,106,762.85	91	45	46
MWD-7	16,667,796.19	1,107,944.36	85	31	54

- Notes: 1. NA – Information not available  
 2. Boring coordinates provided in Texas State Plane South Zone NAD83

#### 4.2.2 Current Subsurface Investigation

The current subsurface investigation was performed in accordance with the approved SBP. A total of 35 borings were advanced in expansion area where all the borings are at least five feet deeper than the elevation of the deepest excavation, 70 ft-msl, and 18 of the 35 borings are at least thirty feet below the deepest excavation. Twelve borings were completed as piezometers to provide groundwater elevation data. The boreholes are identified as 101 through 135 with a prefix of 'B-' for the boreholes and 'PZ-' for the piezometers.

**Table III4-5B: Coordinates and Elevations of Borings Advanced in the Expansion Area (ft)**

Boring	Northing <sup>1</sup> (ft)	Easting <sup>1</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
PZ-101	16,672,192.55	1,106,495.22	97.8	60	37.8
B-102	16,672,066.31	1,107,318.56	95.3	35	60.3
B-103	16,671,938.34	1,108,124.57	94.4	55	39.4
PZ-104	16,671,821.46	1,108,965.02	95.5	35	60.5

Boring	Northing <sup>1</sup> (ft)	Easting <sup>1</sup> (ft)	Ground Elevation (ft-msl)	Depth (ft-bgs)	Bottom Elevation (ft-msl)
B-105	16,671,681.02	1,109,781.78	88.7	50	38.7
PZ-106	16,671,555.69	1,110,594.81	84.8	30	54.8
B-107	16,671,516.22	1,106,392.87	87.9	25	62.9
B-108	16,671,377.05	1,107,210.46	98.3	60	38.3
B-109	16,671,251.10	1,108,033.90	87.9	25	62.9
B-110	16,671,136.94	1,108,850.76	92.1	55	37.1
B-111	16,671,002.92	1,109,671.86	89.1	30	59.1
B-112	16,670,874.68	1,110,498.71	86.8	50	36.8
PZ-113	16,670,843.25	1,106,277.71	85.8	50	35.8
B-114	16,670,703.98	1,107,109.34	91.6	30	61.6
B-115	16,670,592.78	1,107,899.67	99.3	62	37.3
PZ-116	16,670,444.83	1,108,755.73	93.2	30	63.2
B-117	16,670,335.07	1,109,568.12	91.8	55	36.8
PZ-118	16,670,193.76	1,110,392.83	89.4	35	54.4
B-119	16,669,643.34	1,109,465.29	84.3	25	59.3
B-120	16,669,515.09	1,110,285.15	92.8	55	37.8
B-121	16,669,413.56	1,111,072.66	94.5	32	62.5
PZ-122	16,669,091.56	1,111,975.25	92.2	55	37.2
B-123	16,668,982.12	1,109,304.96	83	45	38
PZ-124	16,668,836.59	1,110,178.48	97.6	40	57.6
B-125	16,668,708.21	1,111,001.47	94.9	60	34.9
B-126	16,668,443.85	1,111,760.57	93.3	30	63.3
B-127	16,668,290.12	1,109,248.44	94.3	45	49.3
B-128	16,668,168.26	1,110,069.45	98.2	60	38.2
B-129	16,668,024.21	1,110,893.17	100	35.3	64.7
PZ-130	16,667,916.49	1,111,609.19	100.5	65	35.5
PZ-131	16,667,606.90	1,109,142.73	96.3	60	36.3
B-132	16,667,493.43	1,109,964.91	94.9	35	59.9
PZ-133	16,667,399.31	1,110,759.32	98.2	60	38.2
PZ-134	16,670,873.39	1,104,174.27	82.4	45	37.4
B-135	16,670,700.05	1,105,208.90	83.1	22	61.1

Note: 1. Boring coordinates provided in Texas State Plane South Zone NAD83

#### 4.2.3 Boring Installation, Abandonment, and Plugging

30 TAC §330.63(e)(4)(D)

Twelve borings were completed as piezometers in accordance with applicable rules in 16 TAC §76 – Water Well Drillers and Water Well Pump Installers to provide groundwater elevation data. The remaining borings were plugged with a cement-bentonite grout.

#### 4.3 Interpretive Geologic Cross-Sections

30 TAC §330.63(e)(4)(G)

Interpretive geologic cross-sections are presented on Figures III4-12B through III4-12H and include a key map of the cross-section locations depicted on Figure III4-12A, Soil Boring Map. These cross-sections utilized boring information gathered from the current and previous subsurface investigations to show boring profiles relative to existing ground and interpretive soil stratum boundaries. The boring profiles include corresponding soil classifications, any static and initial water levels, and well screen locations for any piezometers and monitoring wells.

#### 4.4 Subsurface Stratigraphy

30 TAC §330.63(e)(4)(H)

The results of the subsurface investigation is consistent with previous studies at the facility. The facility is underlain by three distinct strata, identified below in order from ground surface down:

- Stratum I: sandy clays or clayey sands, with layers of silty clay, silty sand, or clayey silt.
- Stratum II: sands/silty sands, fine, poorly graded, and is the uppermost water-bearing unit (uppermost aquifer).
- Stratum III: predominantly clay, with some amounts of sandy clay or silty clay, high plasticity, hard, brown, and dry, and is the confining unit underlying the uppermost water-bearing unit (lower confining unit).

### 5.0 GEOTECHNICAL PROPERTIES

30 TAC §330.63(e)(5)

#### 5.1 Laboratory Testing

30 TAC §330.63(e)(5)(A)&(B)

Multiple samples were collected in accordance with the approved SBP including both Shelby tube and split-spoon samples. All soil samples were observed to determine the stratigraphy; a total of 81 soil samples

were used for laboratory testing. Laboratory testing was performed on the selected samples in accordance with commonly accepted methods and practices of American Society for Testing and Materials (ASTM).

Falling head permeability tests were performed according to ASTM D5084, Standard Test Methods for Measurement of Hydraulic Conductivity of Saturated Porous Materials Using a Flexible Wall Permeameter, on undisturbed soil samples using tap water as the permeant. Five undisturbed samples that represent the sidewall of cell excavation were tested for the coefficient of permeability on the sample's in-situ horizontal axis; all others were tested on the in-situ vertical axis. Calculations for the final coefficient of permeability test results for each sample tested indicate the type of test used and the orientation of each tested sample.

Sieve analysis were performed using ASTM D422 and D1140; Atterberg limits per ASTM D4318; moisture content per ASTM D2216; the unit weight per ASTM D7263; and specific gravity per ASTM D854. Shear strength testing consisted of unconsolidated-undrained (UU) triaxial compression tests per ASTM D2850 and consolidation testing was performed per ASTM D2435.

Appendix III4C, Soil Laboratory Testing Data includes the aforementioned testing for the selected samples. A summary of the soil samples and their corresponding tests is provided in Table III4-6, Soil Sample Laboratory Testing Summary. Collectively, 61 samples from Stratum I, 10 samples from Stratum II, and 10 samples from Stratum III were tested. These strata collectively represent the bottom and side of the proposed excavation, as well as the 30 feet below the lowest elevation of excavation. Laboratory testing data from previous investigations are included in Appendix III4D, Previous Geotechnical Testing Data.

**Table III4-6: Soil Sample Laboratory Testing Summary**

Boring	Sample Depth (ft-bgs)	Stratum	ASTM Test Method							
			D 2216	D 4318	D 1140	D 7263	D 854	D 2850	D 2435	D 5084
			Water Content	Atterberg Limits	Sieve Analysis	Unit Weight	Specific Gravity	Triaxial U/U	Consolidation (ILC)	Permeability
B-102	3-5	I	✓	✓		✓				
B-102	15-17	I	✓							
B-102	23-25	I	✓	✓	✓			✓		
B-103	0-2	I	✓							
B-103	10-12	I	✓							
B-103	18-20	I	✓							
B-103	40-42	II	✓							
B-105	0-2	I	✓							
B-105	38-40	II			✓					
B-107	5-7	I	✓							
B-107	8-10	I	✓	✓	✓					
B-108	13-15	I	✓	✓	✓					

Boring	Sample Depth (ft-bgs)	Stratum	ASTM Test Method							
			D 2216	D 4318	D 1140	D 7263	D 854	D 2850	D 2435	D 5084
			Water Content	Atterberg Limits	Sieve Analysis	Unit Weight	Specific Gravity	Triaxial U/U	Consolidation (ILC)	Permeability
B-108	23-25	I	✓	✓			✓	✓		
B-108	53-55	II			✓					
B-109	0-2	I	✓	✓						
B-109	10-12	I	✓							
B-109	13-15	I	✓	✓	✓					✓(V)
B-110	6.5-8.5	I	✓		✓					
B-110	23-25	I	✓							✓(H)
B-110	30-32	I	✓	✓	✓					
B-111	0-2	I	✓							
B-111	18-20	I							✓	
B-112	0-2	I	✓	✓	✓					
B-112	10-12	I	✓							
B-112	43-45	II			✓					✓(V)
B-114	20-22	I	✓							
B-114	28-30	I			✓					
B-115	25-27	I	✓							
B-115	28-30	I	✓	✓	✓					
B-115	45-47	III	✓							
B-115	53-55	III	✓		✓					✓(H)
B-117	0-2	I	✓							
B-117	8-10	I		✓						
B-117	10-12	I	✓		✓					
B-117	30-32	II	✓							
B-117	53-55	III								✓(V)
B-119	10-12	I	✓							
B-119	13-15	I	✓	✓						
B-120	20-22	I	✓							
B-120	25-27	I	✓							
B-120	50-52	III	✓							
B-121	30-32	I	✓							
B-123	13-15	I	✓	✓	✓					
B-123	15-17	I	✓							
B-125	10-12	I	✓							
B-125	38-40	III		✓	✓			✓		✓(V)
B-125	43-45	III	✓		✓				✓	✓(H)
B-125	55-57	III	✓							
B-126	0-2	I	✓							
B-126	25-27	I	✓	✓						
B-127	0-2	I	✓							
B-127	25-27	I	✓							
B-127	38-40	II			✓					
B-128	45-47	II	✓	✓						
B-128	55-57	III	✓							

Boring	Sample Depth (ft-bgs)	Stratum	ASTM Test Method							
			D 2216	D 4318	D 1140	D 7263	D 854	D 2850	D 2435	D 5084
			Water Content	Atterberg Limits	Sieve Analysis	Unit Weight	Specific Gravity	Triaxial U/U	Consolidation (ILC)	Permeability
B-129	0-2	I	✓	✓	✓					
B-129	8-10	I	✓							
B-129	33-35	I	✓						✓	
B-132	18-20	I	✓	✓						
B-132	20-22	I	✓							
B-135	0-2	I	✓							
PZ-101	8-10	I	✓	✓	✓					
PZ-101	33-35	I			✓					
PZ-104	13-15	I	✓	✓	✓					
PZ-106	8-10	I	✓	✓	✓					
PZ-113	3-5	I	✓							
PZ-116	3-5	I	✓	✓	✓					
PZ-118	3-5	I								✓ <sup>(H)</sup>
PZ-118	23-25	I	✓	✓	✓					
PZ-122	8-10	I								✓ <sup>(H)</sup>
PZ-122	18-20	I	✓	✓	✓					
PZ-122	20-22	I	✓							
PZ-122	33-35	II			✓					
PZ-122	38-40	II	✓							
PZ-124	8-10	I	✓	✓	✓					
PZ-124	28-30	I	✓	✓	✓					
PZ-130	38-40	I	✓	✓	✓					
PZ-130	58-60	III	✓							
PZ-131	8-10	I	✓	✓	✓					
PZ-133	58-60	III	✓	✓	✓					
PZ-134	33-35	II	✓	✓	✓					

✓<sup>(H)</sup> denotes tested for the coefficient of permeability on the sample's in-situ horizontal axis.  
 ✓<sup>(V)</sup> denotes tested for the coefficient of permeability on the sample's in-situ vertical axis.

## 5.2 Geotechnical Properties of the Subsurface Soil Materials

30 TAC §330.63(e)(5)

### 5.2.1 Stratum I

This stratum is described as sandy clays or clayey sands, with layers of silty clay, silty sand, or clayey silt that ranges in thickness from approximately 18 to 45 ft. The water table generally lies within the lower part of Stratum I. This Stratum roughly corresponds to the uppermost soil layer described in previous subsurface investigations. Table III4-7A summarizes the geotechnical properties of Stratum I.

**Table III4-7A: Geotechnical Properties of Stratum I**

	Minimum Value	Maximum Value	Average Value	Number of Tests	Test Method
Water Content (%)	3.7	33.5	13.6	55	ASTM D2216
Liquid Limit	20	58	30.5	22	ASTM D4318
Plastic Limit	10	19	13.25	16	ASTM D4318
Plasticity Index	9	43	19.88	16	ASTM D4318
Liquidity Index	-1	0.2	-0.10	16	ASTM D4318
Unconsolidated Undrained Compressive Strength (tsf)	1.6	3.7	2.6	2	ASTM D2850
Vertical Permeability (cm/s)	--	--	$6.38 \times 10^{-8}$	1	ASTM D5084
Horizontal Permeability (cm/s)	$5.78 \times 10^{-7}$	$5.30 \times 10^{-6}$	$1.32 \times 10^{-6}$ *	3	ASTM D5084

Note: \* = Geometric mean

### 5.2.2 Stratum II

Stratum II consists mainly of fine, poorly graded, sands or silty sand as encountered in most boreholes that were drilled past Stratum I. However, there were some boreholes containing more clayey sands than silty sands. This second layer ranges in thickness from approximately 5 to 30 ft and corresponds to the uppermost water-bearing unit (uppermost aquifer) described in previous subsurface investigations. Because the presence of overlying clayey soils in Stratum I, Stratum II can be a locally confined water-bearing unit. The minimum elevation where the top of Stratum II was encountered was approximately 51 ft-msl. The average top of the layer is approximately at elevation 62 ft-msl.

Table III4-7B summarizes the geotechnical properties of Stratum II. The geometric mean of the horizontal permeability measured from field slug tests presented in Appendix III4G, Slug Test data is  $1.65 \times 10^{-4}$  cm/s. The vertical permeability from laboratory soil testing is  $1.91 \times 10^{-4}$  cm/s.

**Table III4-7B: Geotechnical Properties of Stratum II**

	Minimum Value	Maximum Value	Average Value	Number of Tests	Test Method
Water Content (%)	4.3	24.1	17.9	5	ASTM D2216
Liquid Limit	--	--	--	--	ASTM D4318
Plastic Limit	--	--	--	--	ASTM D4318
Plasticity Index	--	--	--	--	ASTM D4318
Liquidity Index	--	--	--	--	ASTM D4318
Vertical Permeability (cm/s)	--	--	$1.91 \times 10^{-4}$	1	ASTM D5084
Horizontal Permeability (cm/s)	$3.74 \times 10^{-6}$	$4.40 \times 10^{-3}$	$1.65 \times 10^{-4}$ *	--	ASTM D4044

Note: \* = Geometric mean is presented for the permeability measured from slug tests performed as discussed in §6.5.2

### 5.2.3 Stratum III

Stratum III consists of predominantly high plasticity, hard, brown, dry clay with minor amounts of sandy clay or silty clay; caliche has been observed within the plastic clay. Stratum III corresponds to the lower confining unit described in previous subsurface investigations and hydraulically separates uppermost water-bearing unit from lower aquifers. The top of Stratum III was found between an approximate elevation of 39 ft-msl and 70 ft-msl with an average of approximately 50 ft-msl. The bottom of this stratum was only encountered in one historical boring. Borehole B-5, drilled by PSI in 1993, encountered a lower fourth stratum composed of clayey sand at an elevation 7 ft-msl to -5 ft-msl followed by fine sand down to -10 ft-msl. The thickness of Stratum III from this borehole is approximately 36 ft.

Table III4-7C summarizes the geotechnical properties of Stratum III. Based on the laboratory soil testing, the vertical and horizontal permeability of this layer are estimated to be  $8.84 \times 10^{-9}$  cm/s and  $1.63 \times 10^{-7}$  cm/s, respectively. The average permeability of Stratum III soil materials is three orders of magnitude lower than that of Stratum II. Hence, Stratum III acts as an aquiclude, restricting groundwater flow from vertical movement into underlying units.

**Table III4-7C: Geotechnical Properties of Stratum III**

	Minimum Value	Maximum Value	Average Value	Number of Tests	Test Method
Water Content (%)	17.6	33.9	24.2	8	ASTM D2216
Liquid Limit	56	60	58	2	ASTM D4318
Plastic Limit	16	18	17	2	ASTM D4318
Plasticity Index	38	44	41	2	ASTM D4318
Liquidity Index	-0.47	0.16	-0.16	2	ASTM D4318
Unconsolidated Undrained Compressive Strength (tsf)	5.0	--	--	1	ASTM D2850
Vertical Permeability (cm/s)	$8.84 \times 10^{-9}$	$6.84 \times 10^{-5}$	$7.78 \times 10^{-7}$ *	2	ASTM D5084
Horizontal Permeability (cm/s)	$1.92 \times 10^{-8}$	$1.38 \times 10^{-6}$	$1.63 \times 10^{-7}$ *	2	ASTM D5084

Note: \* = Geometric mean

### 5.2.4 Suitability of Soils

On-site soils will be required for construction of the protective cover component of the liner system, for construction of the cohesive soil cover layer and erosion layer components of the final cover system, for daily and intermediate cover, and for general fill.

The construction of cohesive soil cover layers must be from compacted soils with hydraulic permeability less than  $1 \times 10^{-5}$  cm/s; laboratory soil testing demonstrate that excavated surface soils should meet this requirement. Also, excavated soils are suitable for operational and protective cover, erosion layer component of the final cover system, daily and intermediate cover, and general fill.

Part III3, Waste Management Unit Design Report includes detailed engineering evaluations and analyses using the geotechnical properties of on-site soils. The analyses indicate that the soils at the facility are suitable for the intended purpose.

## 6.0 GROUNDWATER INVESTIGATION

### 6.1 Local Hydrogeology

The second stratigraphic layer, Stratum II, which is composed of sands/silty sands, is the upper water bearing unit at the site (uppermost aquifer). As mentioned in §5.2.2, the thickness of Stratum II varies from 5 to 30 feet, except in portions of the northwest corner of the proposed expansion area where it was not encountered. The extent of this stratum can be seen in Figures III4-12B through III4-12H, which depicts the monitoring wells, borings and sub-surface profiles obtained from the soil investigations at the site. Groundwater occurs primarily within Stratum II, separated from lower aquifers by underlying Stratum III, which acts as an aquiclude. The groundwater within Stratum II is also locally, partially confined by the clayey soils encountered in Stratum I. In other areas, recharge could occur through vertical flows through overlying sandy soils. Recharge areas for the Gulf Coast Aquifers are shown in Figure III4-9, Gulf Coast Aquifers in Lower Rio Grande Valley. A detailed discussion of the groundwater conditions in the site area is presented in Part III5, Groundwater Characterization Report.

### 6.2 Groundwater Investigation

30 TAC §330.63(e)(5)(C)

Numerous subsurface investigations have been carried out at the facility for purposes related to geological and hydrogeological characterization, groundwater monitoring, and gas monitoring, as detailed in §4.2.1, Previous Subsurface Investigations. Initial and static water level data for these borings are compiled in Table III4-8.

**Table III4-8: Summary of Initial and Static Water Level Data**

Boring	Groundwater Elevation (ft-msl)										
	Initial	Static									
No.1	18	NR	G-4	37.0	NR	GP-27	NR	NR	GP-46	NR	NR
No.2	21	NR	G-5	20.0	20.5	MW-3A	26.0	24.5	GP-47	NR	NR
No.3	21	NR	G-6	43.0	43.0	MW-4A	20.0	17.7	PZ-113	17.5	15.4
No.4	19.5	NR	G-7	20.0	19.7	MW-7R	26.0	19.3	B-114	23.0	NR
No.5	17	NR	G-8	18.0	23.5	MW-8R	6.0	4.1	B-115	35.0	NR
No.6	19	NR	G-9	20.5	20.0	MW-9R	13.0	16.6	PZ-116	25.0	23.5
B-1	18	NR	G-10	36.0	39.5	MW-10R	14.0	15.8	B-117	30.0	NR

Boring	Groundwater Elevation (ft-msl)		Boring	Groundwater Elevation (ft-msl)		Boring	Groundwater Elevation (ft-msl)		Boring	Groundwater Elevation (ft-msl)	
	Initial	Static		Initial	Static		Initial	Static		Initial	Static
B-2	23	NR	G-11	23.0	24.0	MW-15R	20.5	17.1	PZ-118	30.0	27.4
B-3	NR	20.5	G-12	22.0	21.5	MW-16	20.0	16.2	B-119	15.0	NR
B-4	25	21.5	G-13	19.5	20.0	MW-18R	10.6	14.9	B-120	30.0	NR
B-5	NR	20.8	G-14	23.0	22.0	MW-22	24.5	24.5	B-121	NE	NR
MW-1	NR	19.7	P-1 (G-8)	18.0	23.5	MW-23	16.8	17.1	PZ-122	40.0	35.9
MW-2	NR	20.81	P-2 (G-9)	20.5	20.0	MW-24	15.8	16.6	B-123	15.0	NR
MW-3	NR	NR	MW-9	NR	NR	MWD-7	17.0	19.0	PZ-124	35.0	30.2
MW-4	NR	NR	MW-10	NR	NR	MWD-6	NR	NR	B-125	40.0	NR
SB-01	22.5	22.6	MW-11	NR	NR	PZ-101	28.0	29.2	B-126	NE	NR
SB-02	16.4	17	MW-12	NR	NR	B-102	28.0	NR	B-127	35.0	NR
SB-03	24	20.9	MW-13	NR	NR	B-103	25.0	NR	B-128	30.0	NR
SB-04	25.2	25.2	MW-14	NR	NR	PZ-104	29.0	28.5	B-129	NE	NR
SB-05	26.5	21	MW-1R	20.0	14.2	B-105	23.0	NR	PZ-130	30.0	34.1
MW-5	26	NR	MW-2R	19.0	23.2	PZ-106	24.5	25.8	PZ-131	33.0	25.9
MW-6	24	NR	MW-3R	30.0	28.2	B-107	18.0	NR	B-132	30.0	NR
MW-7	26	NR	MW-4R	23	NR	B-108	30.0	NR	PZ-133	34.0	19.9
MW-8	30	NR	MW-3RA	30.0	NR	B-109	22.5	NR	PZ-134	15.0	10.4
G-1	20	22.5	MW-15	22.5	24.4	B-110	31.5	NR	B-135	NE	NR
G-2	20.0	23.5	MW-18	22.0	22.3	B-111	20.0	NR			
G-3	37.5	34.5	GP-37	25.0	NR	B-112	25.0	NR			

Note: NR – Not recorded; NE – Not encountered in borehole  
 Piezometer readings were measured during the first groundwater level monitoring event following their installation.

### 6.3 Historical Water-Level Measurements in Monitoring Wells

30 TAC §330.63(e)(5)(D)

Water level data collected from April 1993 to December 2016 for 21 existing monitoring wells and 12 newly installed piezometers. Historic water-level measurements made during any previous groundwater monitoring are presented in a table for each monitoring well and piezometer in Appendix III4E, Historic Groundwater Elevations.

Using data from February 2015 to December 2016, potentiometric maps of the uppermost aquifer present on-site were prepared and are included as Figures III4-13A through III4-13N. A seasonal high potentiometric surface is presented in Figure III4-13O.

## 6.4 Tabulation of Groundwater Monitoring Data

30 TAC §330.63(e)(5)(E)

A tabulation of all relevant groundwater monitoring data from wells on site is presented in Appendix III4F, Historic Groundwater Quality Testing Data. The groundwater monitoring data includes results of all semi-annual and applicable quarterly groundwater monitoring events since 1999. Verification resamples, if collected as part of the statistical analysis, are also included.

## 6.5 Uppermost Aquifer

30 TAC §330.63(e)(5)(F)

Based upon an evaluation of the soil boring and groundwater data from subsurface investigations, the uppermost water-bearing unit (uppermost aquifer) is identified as Stratum II. Based on hydrogeologic investigations of the facility area, vertical flow is restricted by underlying low permeability Stratum III clays that act as a local aquiclude dividing the uppermost water-bearing unit from lower aquifers.

### 6.5.1 Groundwater Flow Direction

Figures III4-13A through III4-13N, Potentiometric Surfaces demonstrate groundwater flow direction across the facility. Groundwater within the currently permitted area of TCEQ Permit MSW-956B has a very low hydraulic gradient with variable flow directions. The hydraulic gradients range from 0.000003 to 0.012 with an average gradient of 0.0013. Within the expansion area to be included in TCEQ Permit MSW-956C, groundwater flow is predominantly towards the east, northeast, or southeast in subdued conformance to topography. The hydraulic gradients range from 0.0001 to 0.012 with an average gradient of 0.0040.

### 6.5.2 Groundwater Flow Rate

Previous investigations performed slug testing within the currently permitted area of TCEQ Permit MSW-956B to determine hydraulic properties of Stratum II, uppermost water-bearing unit (uppermost aquifer), resulting in a hydraulic conductivity of  $1.80 \times 10^{-3}$  cm/s. Slug testing was performed on the twelve piezometers installed during the latest subsurface investigation as well within the expansion area to be included in TCEQ Permit MSW-956C to determine hydraulic properties of Stratum II. These tests were conducted using the falling and rising head methods, whereby the water levels were displaced by introducing a “slug” into the water column. The drop and subsequent rise (following removal of the slug) in water level were monitored with respect to time to determine the horizontal hydraulic conductivity for each piezometer. Hydraulic conductivity values determined using AqteSolv Pro® software for each slug test is included in Appendix III4G, Slug Tests. The geometric mean of the resulting hydraulic conductivity values is  $1.65 \times 10^{-4}$  cm/s.

Groundwater flow rates were estimated for Stratum II, uppermost water-bearing unit (uppermost aquifer), using estimated hydraulic gradients, estimated hydraulic conductivities, and effective porosity for silty sand using the following formula:  $V = (ki)/n_e$ .

Where:  $V$  = velocity  
 $k$  = horizontal permeability  
 $i$  = gradient  
 $n_e$  = effective porosity

**Table III4-9: Groundwater Flow Rates**

Area of Evaluation	Hydraulic Conductivity (k) (cm/s)	Hydraulic Gradient (i) (ft/ft)*	Effective Porosity (n <sub>e</sub> )**	Groundwater flow rate (V) (ft/yr)
Currently Permitted Area (TCEQ Permit MSW-956B)	1.80 x 10 <sup>-3</sup>	0.0013	0.33	7.4
Expansion Area (Included in TCEQ Permit MSW-956C)	1.65 x 10 <sup>-4</sup>	0.0040	0.33	2.0

\* Gradient estimated from monthly potentiometric maps from February 2015 to December 2016.

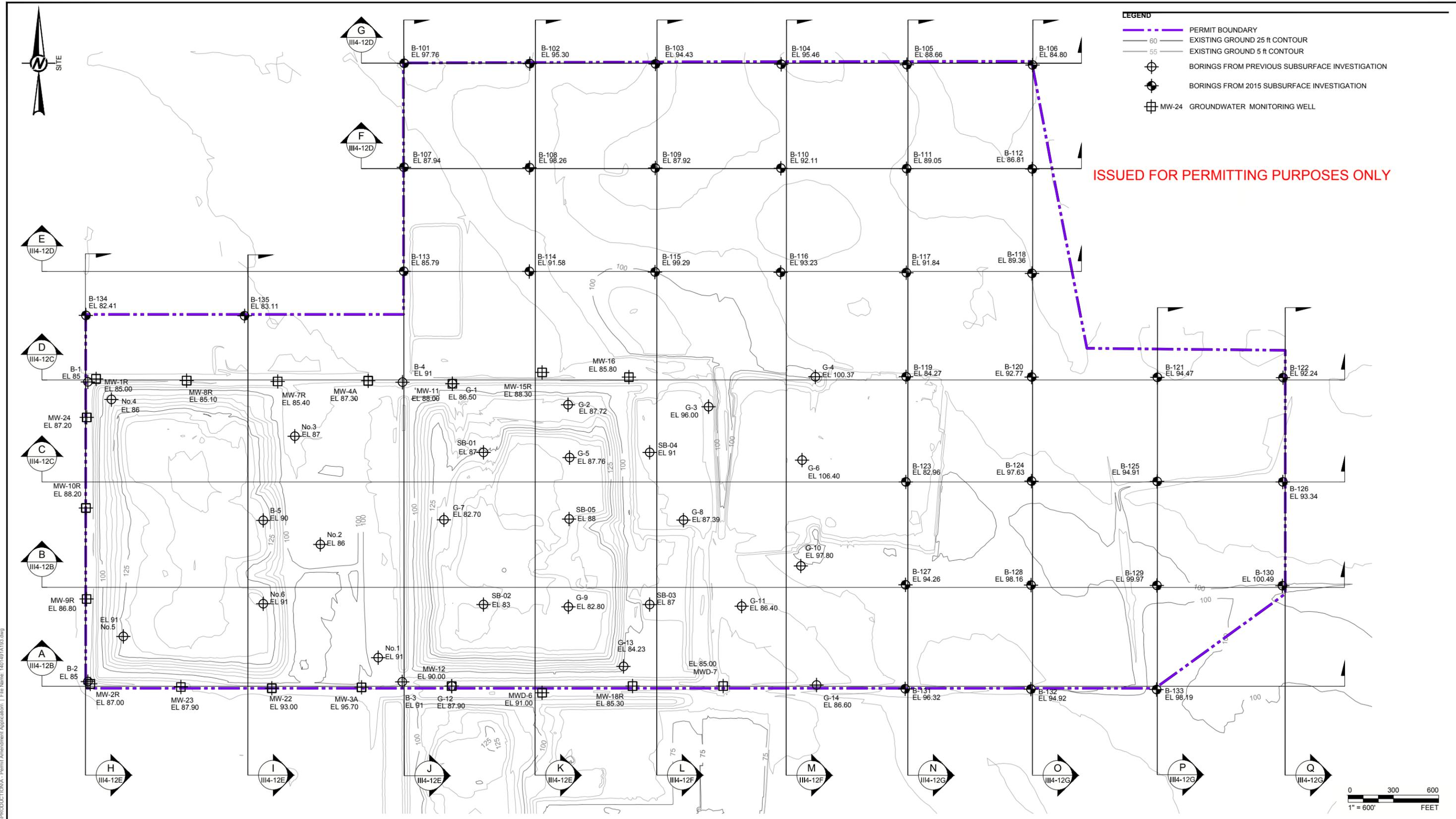
\*\* Assumed for fine sands with some silt based on Freeze and Cherry (1979).

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- LEGEND**
- - - PERMIT BOUNDARY
  - 60 EXISTING GROUND 25 ft CONTOUR
  - 55 EXISTING GROUND 5 ft CONTOUR
  - + BORINGS FROM PREVIOUS SUBSURFACE INVESTIGATION
  - BORINGS FROM 2015 SUBSURFACE INVESTIGATION
  - MW-24 GROUNDWATER MONITORING WELL

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0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI

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CHAD E. IRELAND  
99283  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

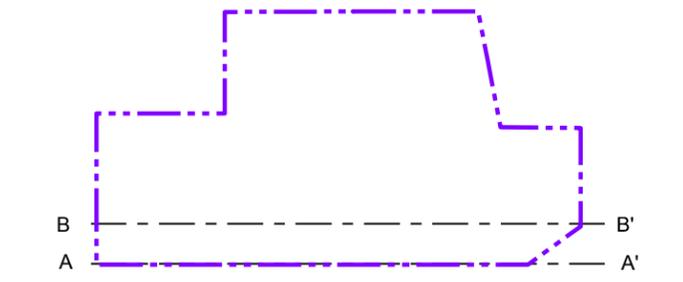
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**BORING LOCATION MAP**

PROJECT NO. 1401491	APPLICATION SECTION III4	REV. 1	12 of 33	FIGURE III4-12A
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KEY MAP



LEGEND

- EXISTING GROUND
- - - ? END OF DATA FOR TOP OF STRATUM II
- · - · ? END OF DATA FOR TOP OF STRATUM III
- No. 2 LANGLEY-PITMAN 1976 BORINGS
- B-3 PSI 1993 BORINGS
- SB-01 RUST 1996 BORINGS
- PZ-101/B-103 GOLDER 2015 BORINGS
- ▼ STATIC WATER LEVEL
- ▽ INITIAL WATER LEVEL
- ▨ SCREENED INTERVAL
- ① ② ③ STRATUM IDs

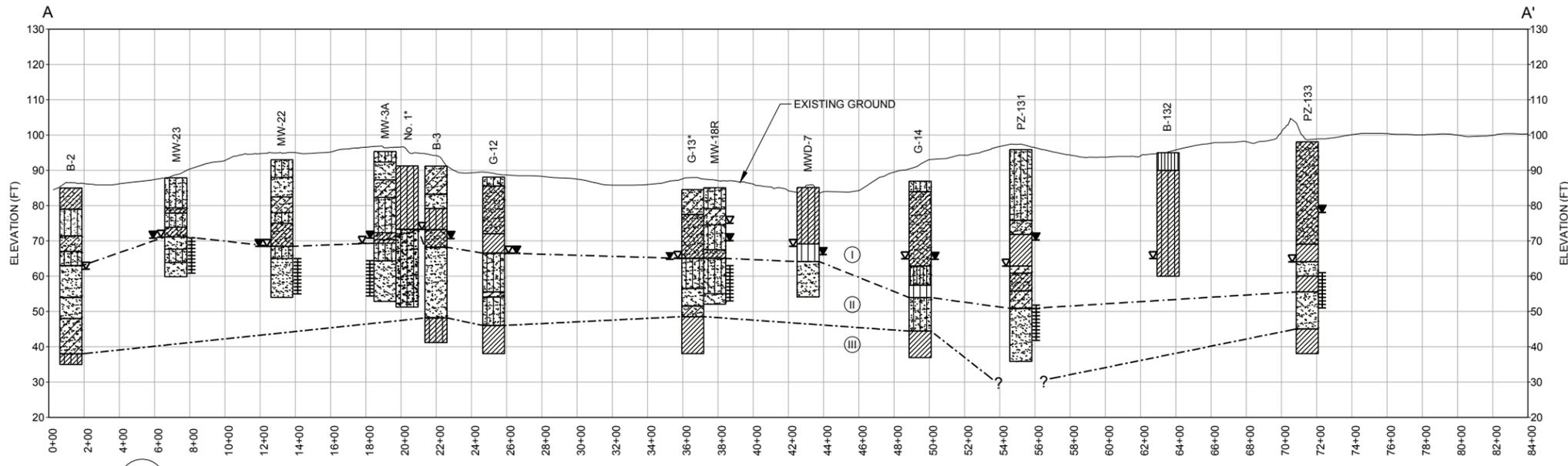
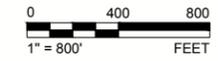
SOIL CLASSIFICATION

- TOP SOIL
- SILT
- SAND
- CLAY
- SILTY SAND
- SANDY SILT
- SANDY CLAY
- CLAYEY SAND
- CLAYEY SILT
- SANDY SILTY CLAY
- SILTY CLAYEY SAND
- NO RECOVERY

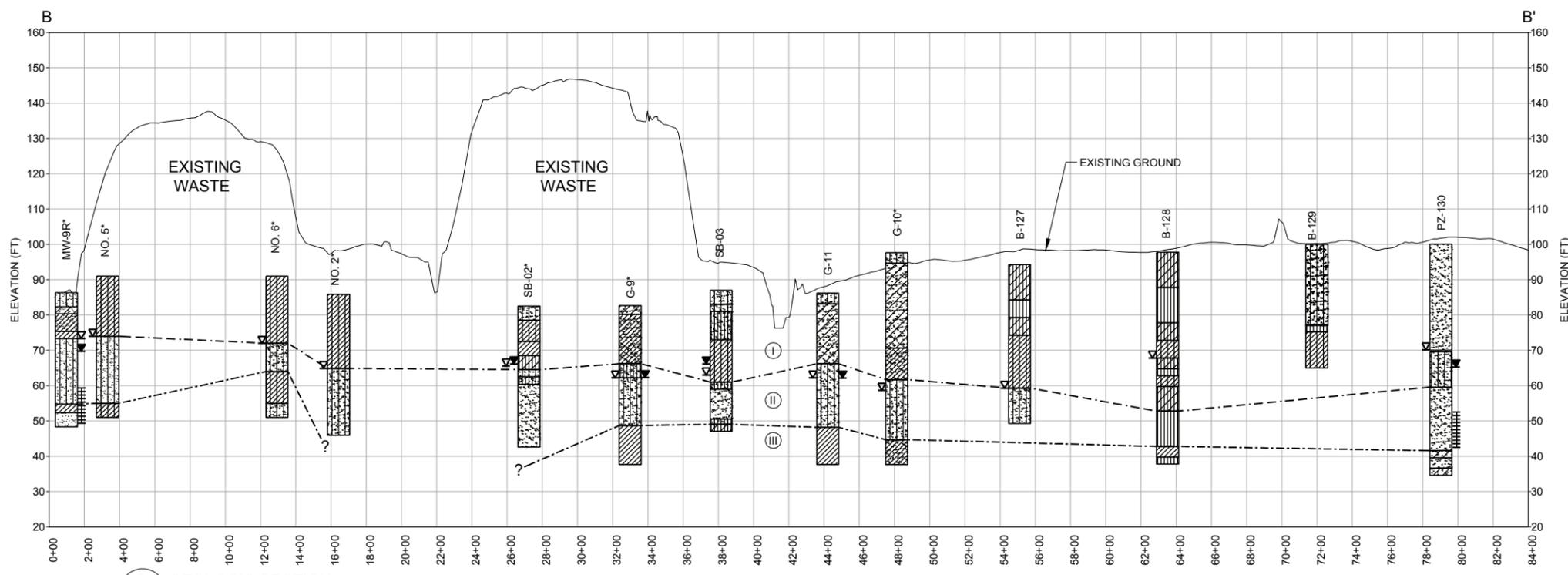
\* BORINGS EXTRAPOLATED TO THE LINE OF CROSS-SECTION

BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION
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No. 2	283.5 S
No. 5	325.5 S
No. 6	108.5 S
G-9	130.0 S
G-10	142.0 N
G-13	131.5 N
MW-9R	77.1 S
SB-02	113.3 S

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SCALE 1" = 800' **A** GEOLOGIC SECTION III4-12B



SCALE 1" = 800' **B** GEOLOGIC SECTION III4-12B

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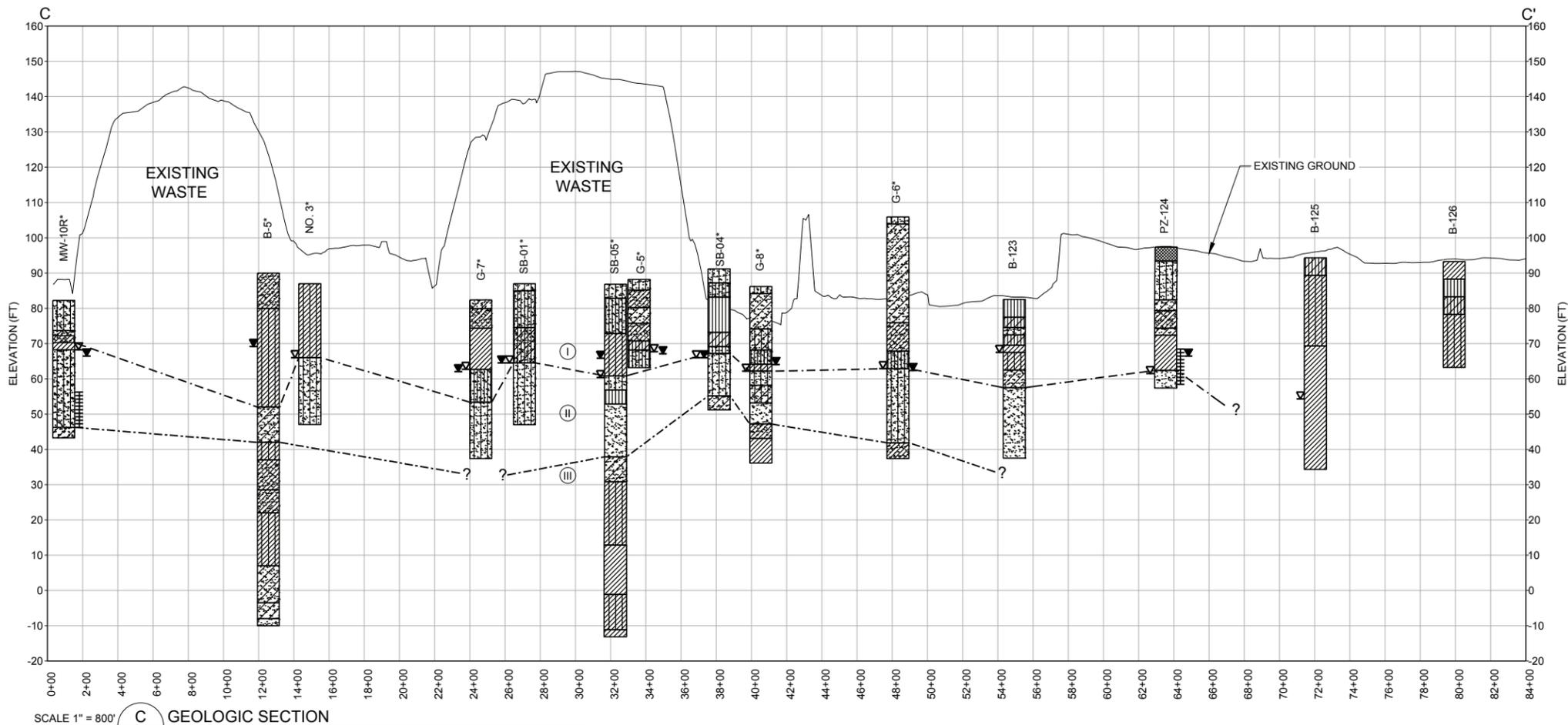
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0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI



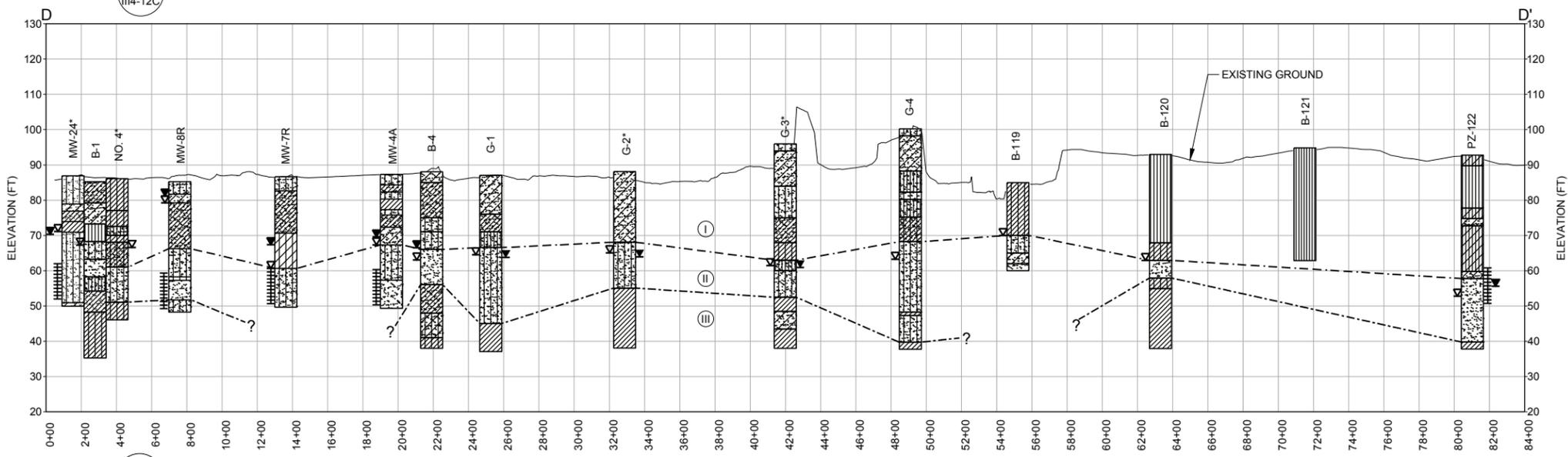
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 500 CENTURY PLAZA DRIVE, SUITE 190  
 HOUSTON, TEXAS  
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PROJECT  
 EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS  
 TITLE  
**INTERPRETIVE GEOLOGIC CROSS-SECTION I**  
 PROJECT NO. 1401491 APPLICATION SECTION III4 REV. 1 OF 13 OF 33 FIGURE III4-12B

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



SCALE 1" = 800' C GEOLOGIC SECTION III4-12C



SCALE 1" = 800' D GEOLOGIC SECTION III4-12C

**KEY MAP**

**LEGEND**

- EXISTING GROUND
- END OF DATA FOR TOP OF STRATUM II
- END OF DATA FOR TOP OF STRATUM III
- No. 2 LANGLEY-PITMAN 1976 BORINGS
- B-3 PSI 1993 BORINGS
- SB-01 RUST 1996 BORINGS
- PZ-101/B-103 GOLDER 2015 BORINGS
- STATIC WATER LEVEL
- INITIAL WATER LEVEL
- SCREENED INTERVAL
- STRATUM IDs

**SOIL CLASSIFICATION**

TOP SOIL	SILTY SAND	CLAYEY SAND	NO RECOVERY
SILT	SILTY CLAY	CLAYEY SILT	
SAND	SANDY SILT	SANDY SILTY CLAY	
CLAY	SANDY CLAY	SILTY CLAYEY SAND	

**\* BORINGS EXTRAPOLATED TO THE LINE OF CROSS-SECTION**

BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION	BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION
No. 3	301.5 N	MW-10R	189.1 N
No. 4	130.0 S	MW-24	283.5 S
B-5	254.0 S	SB-01	325.5 S
G-2	164.0 S	SB-04	108.5 S
G-3	177.0 N	SB-05	130.0 S
G-5	161.0 N		
G-6	106.4 N		
G-7	250.0 S		
G-8	252.7 S		

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI

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TEXAS REGISTRATION F-2578

CLIENT

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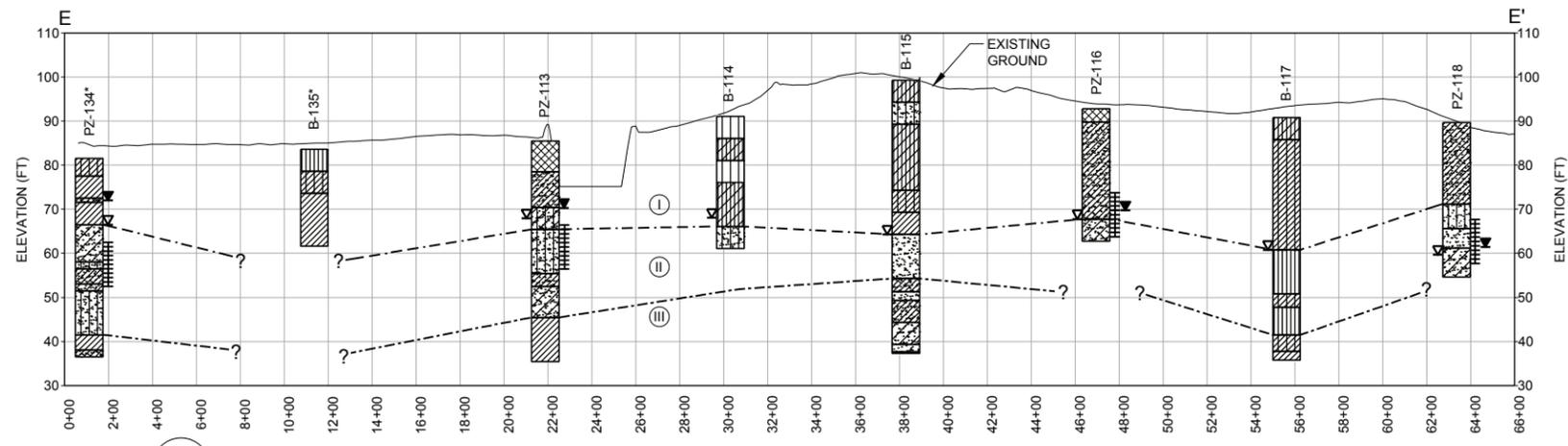
PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**INTERPRETIVE GEOLOGIC CROSS-SECTION II**

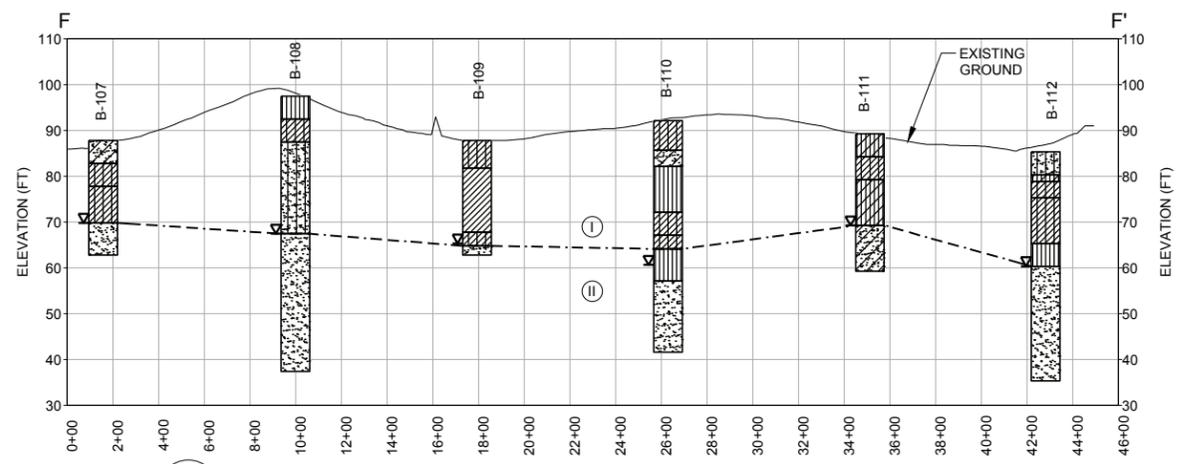
PROJECT NO. 1401491 APPLICATION SECTION III4 REV. 1 14 of 33 FIGURE III4-12C

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

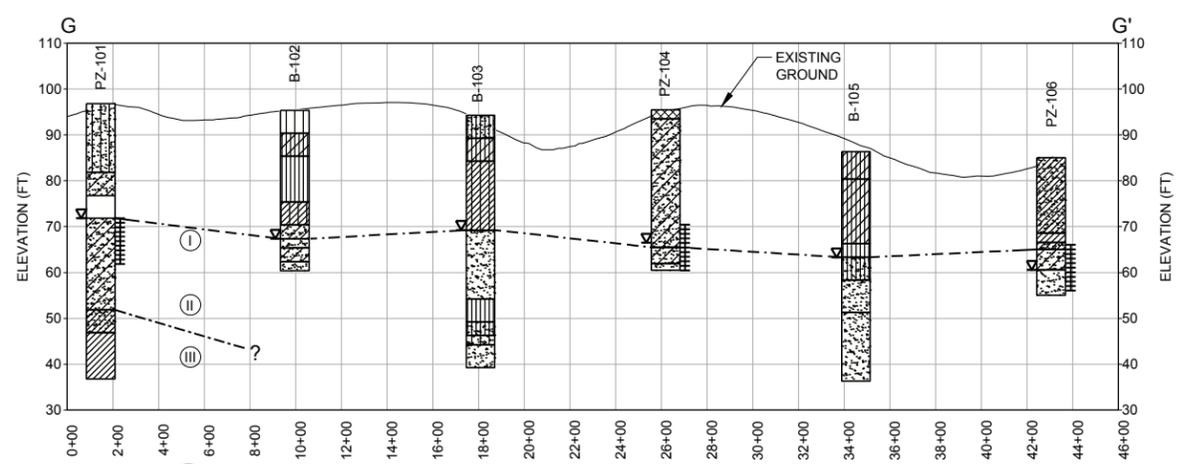
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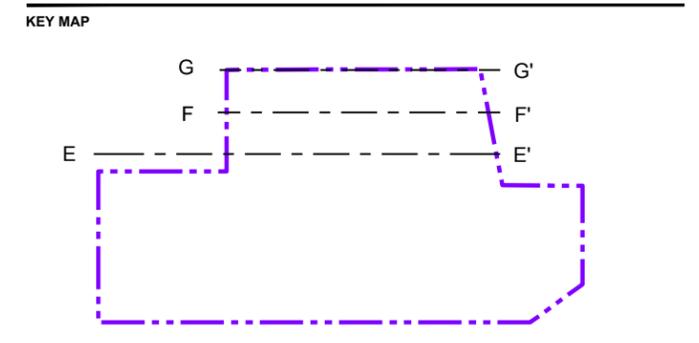
SCALE 1" = 800' **E** GEOLOGIC SECTION  
III4-12D



SCALE 1" = 800' **F** GEOLOGIC SECTION  
III4-12D



SCALE 1" = 800' **G** GEOLOGIC SECTION  
III4-12D



**LEGEND**

—	EXISTING GROUND	▼	STATIC WATER LEVEL
- - - ?	END OF DATA FOR TOP OF STRATUM II	▽	INITIAL WATER LEVEL
- - - ?	END OF DATA FOR TOP OF STRATUM III	▬	SCREENED INTERVAL
No. 2	LANGLEY-PITMAN 1976 BORINGS	① ② ③	STRATUM IDs
B-3	PSI 1993 BORINGS		
SB-01	RUST 1996 BORINGS		
PZ-101/B-103	GOLDER 2015 BORINGS		

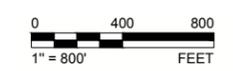
**SOIL CLASSIFICATION**

	TOP SOIL		SILTY SAND		CLAYEY SAND		NO RECOVERY
	SILT		SILTY CLAY		CLAYEY SILT		
	SAND		SANDY SILT		SANDY SILTY CLAY		
	CLAY		SANDY CLAY		SILTY CLAYEY SAND		

**\* BORINGS EXTRAPOLATED TO THE LINE OF CROSS-SECTION**

BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION
B-134	290.0 S
B-135	292.9 S

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI

SEAL  
  
 CHAD E. IRELAND  
 99283  
 LICENSED PROFESSIONAL ENGINEER  
 GOLDER ASSOCIATES INC.  
 TEXAS REGISTRATION F-2578

CLIENT  
  
 CITY OF EDINBURG  
 SOLID WASTE MANAGEMENT

CONSULTANT  
  
 Golder Associates

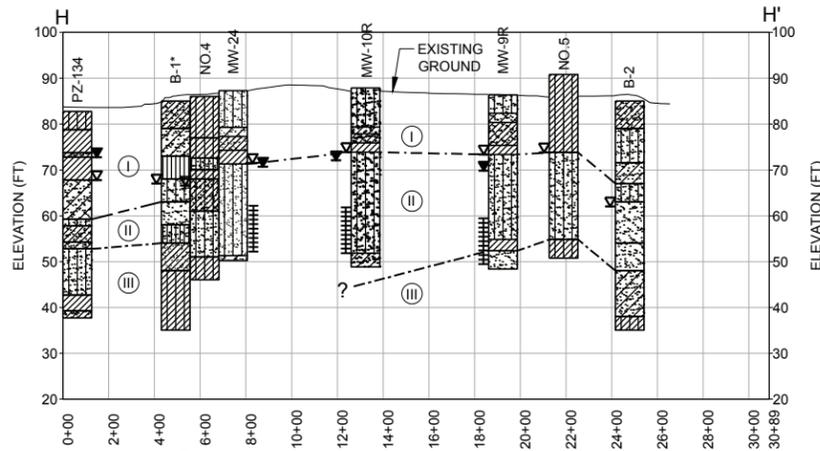
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 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

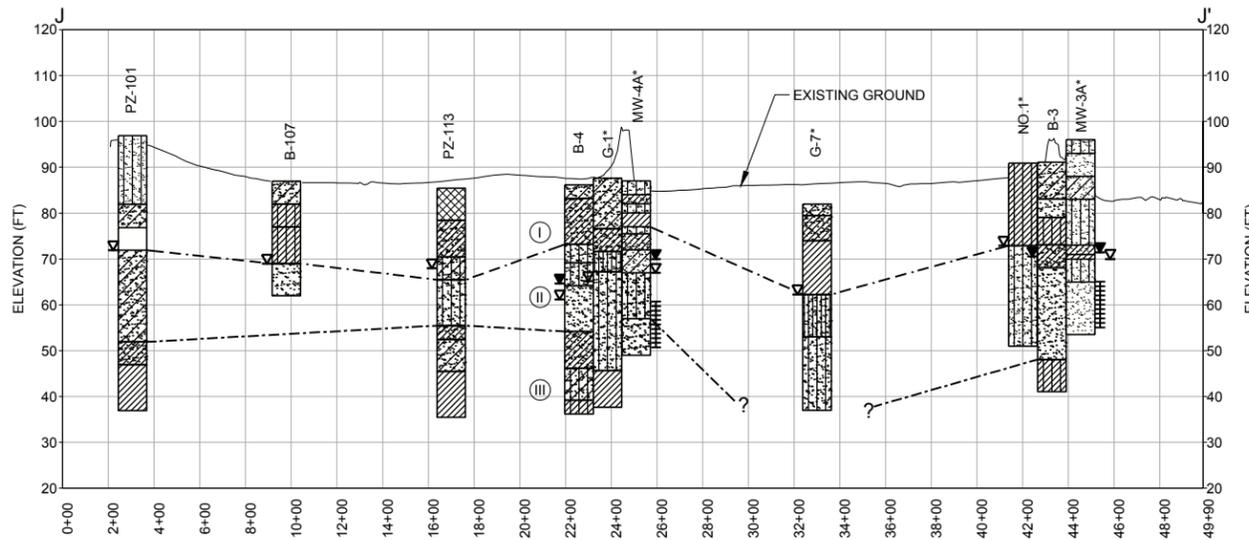
TITLE  
**INTERPRETIVE GEOLOGIC CROSS-SECTION III**

PROJECT NO. 1401491 APPLICATION SECTION III4 REV. 1 15 of 33 FIGURE III4-12D

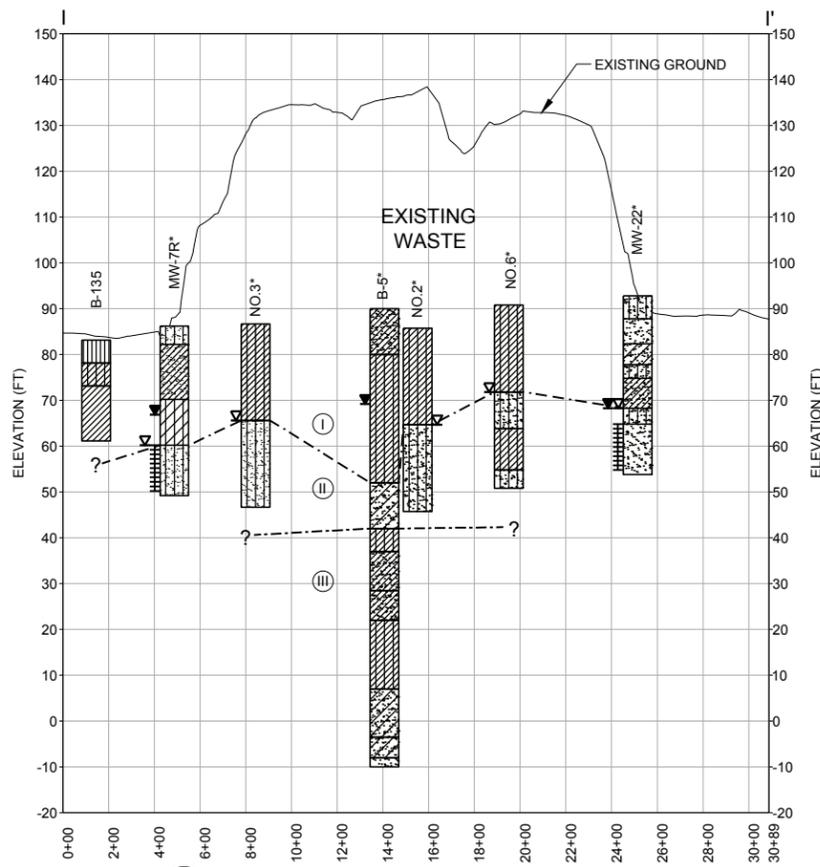
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



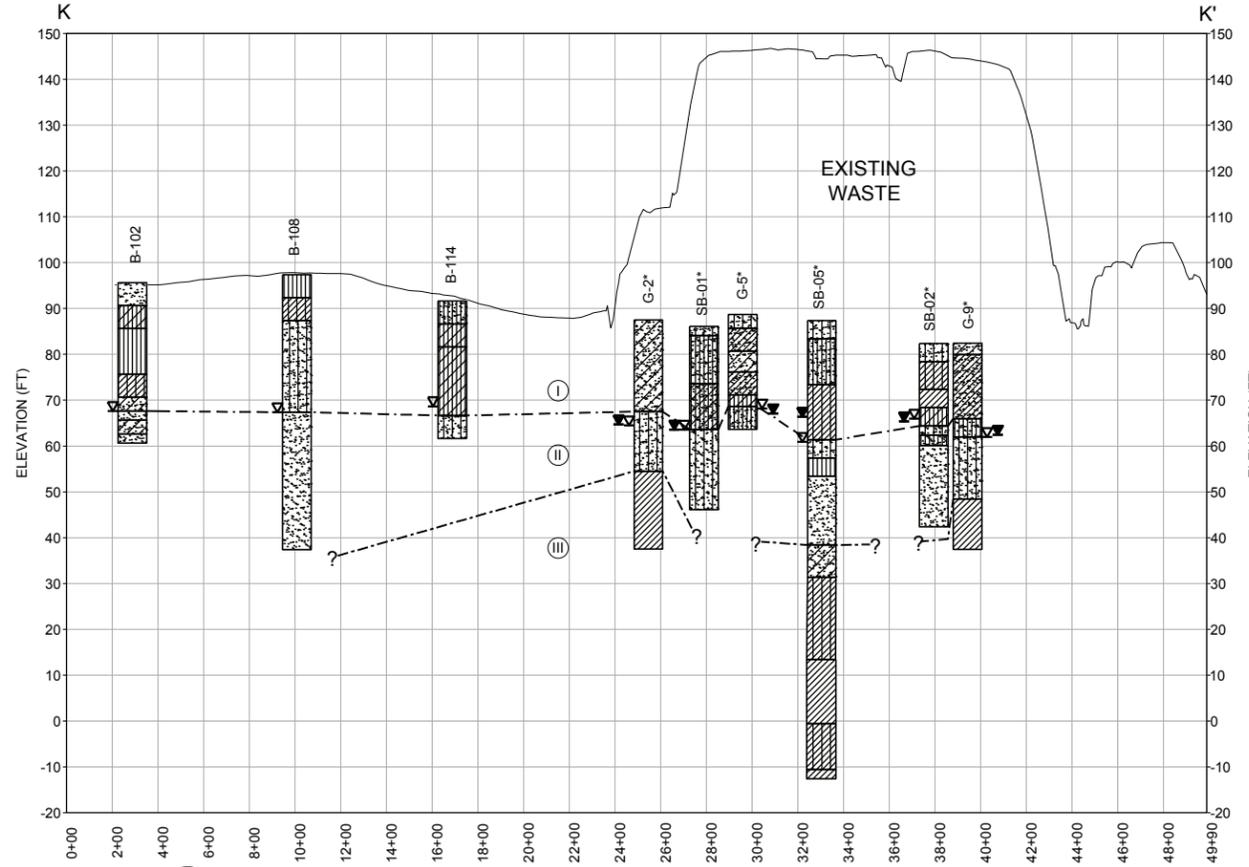
SCALE 1" = 800' H GEOLOGIC SECTION III4-12E



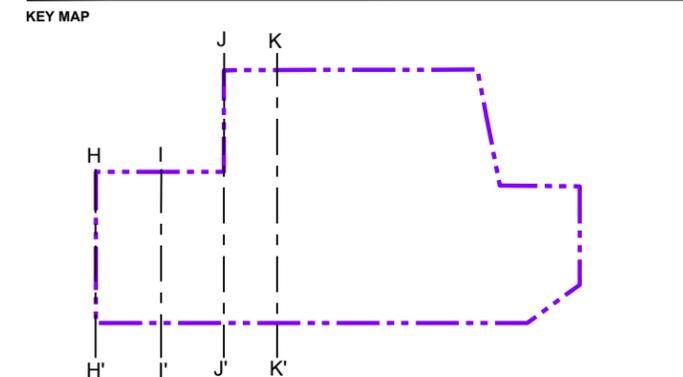
SCALE 1" = 800' J GEOLOGIC SECTION III4-12E



SCALE 1" = 800' I GEOLOGIC SECTION III4-12E



SCALE 1" = 800' K GEOLOGIC SECTION III4-12E



**LEGEND**

- EXISTING GROUND
- - - ? END OF DATA FOR TOP OF STRATUM II
- · - · ? END OF DATA FOR TOP OF STRATUM III
- ▽ STATIC WATER LEVEL
- △ INITIAL WATER LEVEL
- ▬ SCREENED INTERVAL
- No. 2 LANGLEY-PITMAN 1976 BORINGS
- B-3 PSI 1993 BORINGS
- SB-01 RUST 1996 BORINGS
- PZ-101/B-103 GOLDER 2015 BORINGS
- ① ② ③ STRATUM IDs

**SOIL CLASSIFICATION**

TOP SOIL	SILTY SAND	CLAYEY SAND	NO RECOVERY
SILT	SILTY CLAY	CLAYEY SILT	
SAND	SANDY SILT	SANDY SILTY CLAY	
CLAY	SANDY CLAY	SILTY CLAYEY SAND	

**\* BORINGS EXTRAPOLATED TO THE LINE OF CROSS-SECTION**

BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION	BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION
No. 1	171.1 W	G-7	264.2 E
No. 2	479.2 E	G-9	220.0 E
No. 3	310.6 E	MW-3A	281.6 W
No. 6	102.1 E	MW-4A	236.1 W
B-1	70.7 E	MW-7R	197.6 E
B-5	100.7 E	MW-22	158.9 E
G-1	320.8 E	SB-01	342.5 W
G-2	216.9 E	SB-02	342.0 W
G-5	227.1 E	SB-05	224.2 E

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1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI



CLIENT: CITY OF EDINBURG SOLID WASTE MANAGEMENT

CONSULTANT: Golder Associates

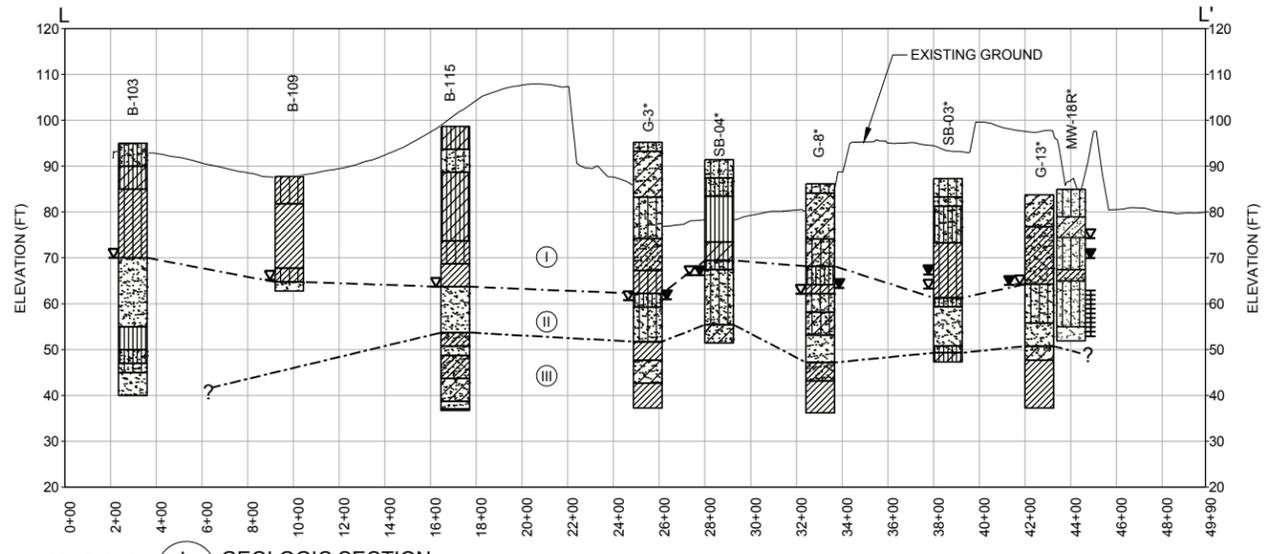
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PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

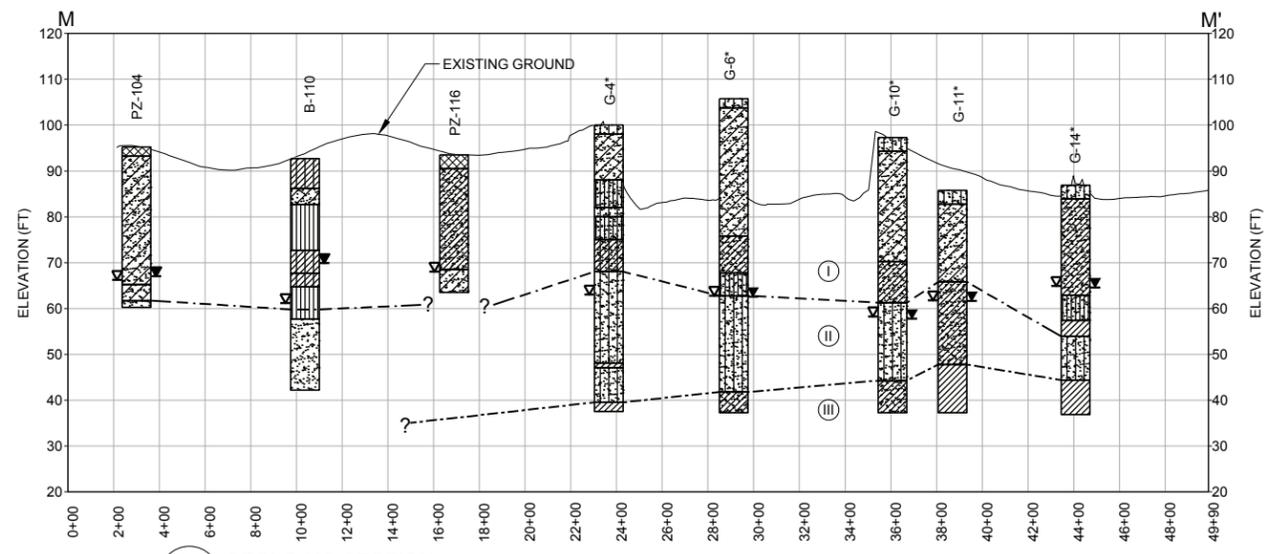
TITLE: INTERPRETIVE GEOLOGIC CROSS-SECTION IV

PROJECT NO. 1401491 APPLICATION SECTION III4 REV. 1 OF 33 FIGURE III4-12E

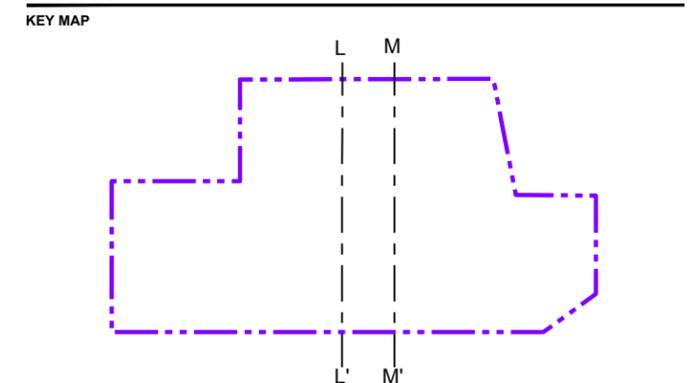
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



SCALE 1" = 800' L GEOLOGIC SECTION III4-12F



SCALE 1" = 800' M GEOLOGIC SECTION III4-12F



**LEGEND**

— EXISTING GROUND  
 - - - ? END OF DATA FOR TOP OF STRATUM II  
 - - - ? END OF DATA FOR TOP OF STRATUM III

▼ STATIC WATER LEVEL  
 ▽ INITIAL WATER LEVEL  
 [ ] SCREENED INTERVAL

No. 2 LANGLEY-PITMAN 1976 BORINGS  
 B-3 PSI 1993 BORINGS  
 SB-01 RUST 1996 BORINGS  
 PZ-101/B-103 GOLDER 2015 BORINGS

① ② ③ STRATUM IDs

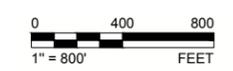
**SOIL CLASSIFICATION**

[ ] TOP SOIL	[ ] SILTY SAND	[ ] CLAYEY SAND	[ ] NO RECOVERY
[ ] SILT	[ ] SILTY CLAY	[ ] CLAYEY SILT	
[ ] SAND	[ ] SANDY SILT	[ ] SANDY SILTY CLAY	
[ ] CLAY	[ ] SANDY CLAY	[ ] SILTY CLAYEY SAND	

**\* BORINGS EXTRAPOLATED TO THE LINE OF CROSS-SECTION**

BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION	BORING	EXTRAPOLATED DISTANCE (ft) AND OFFSET DIRECTION
G-3	341.7 E	SB-03	47.2 W
G-4	192.0 E	SB-04	47.6 W
G-6	104.1 E		
G-8	176.3 E		
G-10	96.4 E		
G-11	295.5 W		
G-13	220.4 W		
G-14	200.7 E		
MW-18R	130.2 W		

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI

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 TEXAS REGISTRATION F-2578

CLIENT  

 CITY OF EDINBURG  
 SOLID WASTE MANAGEMENT

CONSULTANT  

 Golder Associates

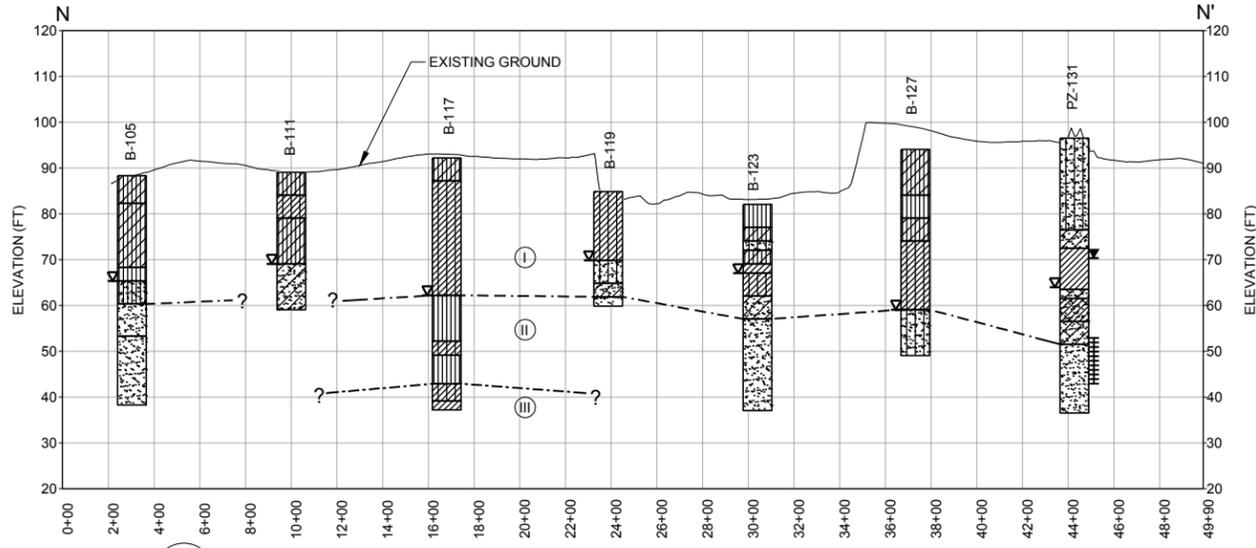
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 [+1] (281) 821-6868  
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 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**INTERPRETIVE GEOLOGIC CROSS-SECTION V**

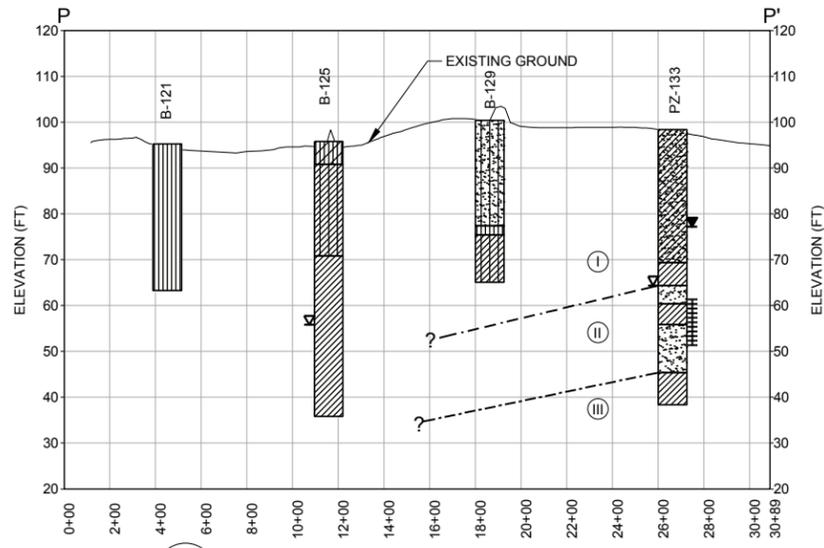
PROJECT NO. 1401491 APPLICATION SECTION III4 REV. 1 OF 33 FIGURE III4-12F

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



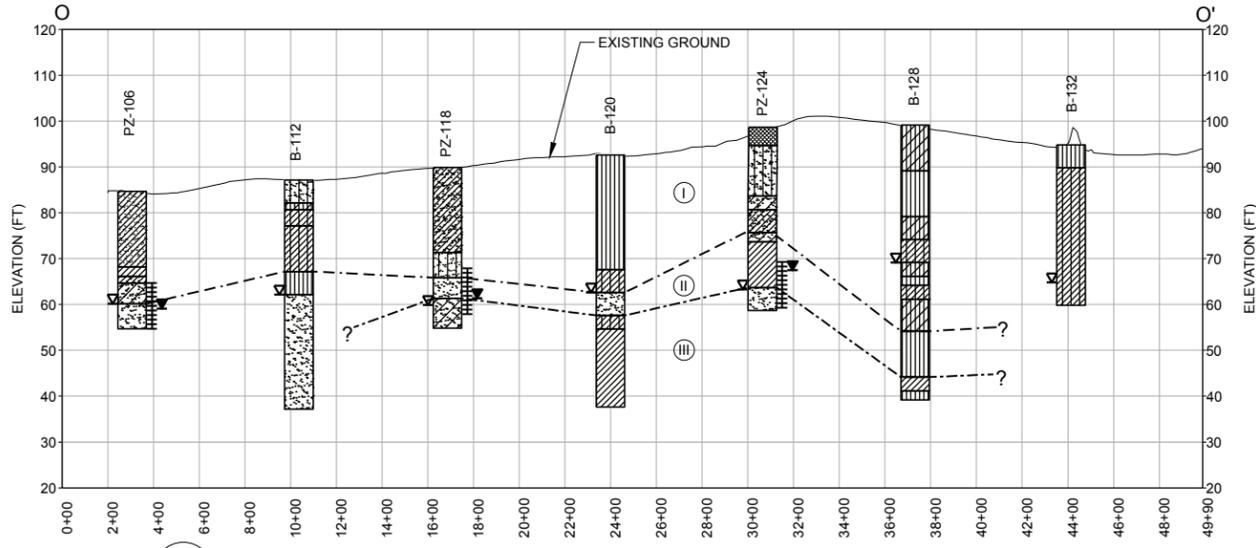
SCALE 1" = 800' N GEOLOGIC SECTION

III4-12G



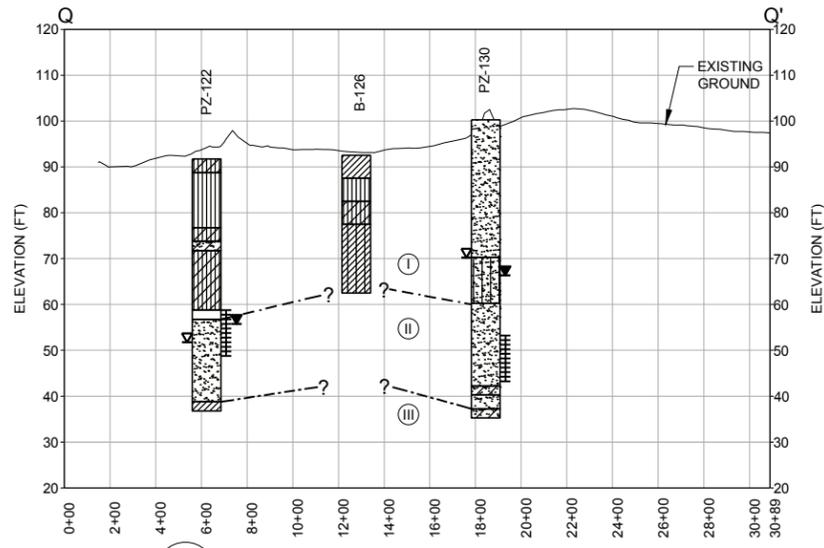
SCALE 1" = 800' P GEOLOGIC SECTION

III4-12G



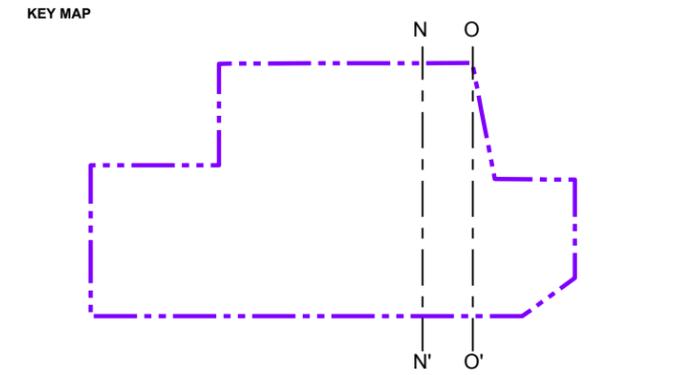
SCALE 1" = 800' O GEOLOGIC SECTION

III4-12G



SCALE 1" = 800' Q GEOLOGIC SECTION

III4-12G



- LEGEND**
- EXISTING GROUND
  - - - ? END OF DATA FOR TOP OF STRATUM II
  - · - · ? END OF DATA FOR TOP OF STRATUM III
  - No. 2 LANGLEY-PITMAN 1976 BORINGS
  - B-3 PSI 1993 BORINGS
  - SB-01 RUST 1996 BORINGS
  - PZ-101/B-103 GOLDER 2015 BORINGS
  - ▽ STATIC WATER LEVEL
  - △ INITIAL WATER LEVEL
  - ▭ SCREENED INTERVAL
  - ① ② ③ STRATUM IDs

- SOIL CLASSIFICATION**
- |          |            |                   |             |
|----------|------------|-------------------|-------------|
| TOP SOIL | SILTY SAND | CLAYEY SAND       | NO RECOVERY |
| SILT     | SILTY CLAY | CLAYEY SILT       |             |
| SAND     | SANDY SILT | SANDY SILTY CLAY  |             |
| CLAY     | SANDY CLAY | SILTY CLAYEY SAND |             |

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1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	ISSUED FOR CLIENT REVIEW	CEI	AA	JAW	CEI

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TEXAS REGISTRATION F-2578

CLIENT

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SOLID WASTE MANAGEMENT

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EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**INTERPRETIVE GEOLOGIC CROSS-SECTION VI**

PROJECT NO. 1401491 APPLICATION SECTION III4 REV. 1 18 of 33 FIGURE III4-12G

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B





TABLE III4E1  
 HISTORICAL GROUNDWATER ELEVATIONS (FT MSL)  
 MONITORING WELLS

Top of Casing Elevations, 10/26/00, (ft msl)	87.58	87.54	89.41	89.36	92.73	94.57	98.38	90.46	91.34	89.99	90.04	87.49	93.49	89.19	89.22	87.73	86.74	88.33	90.10	89.81	91.48	90.99	91.07	92.33	93.20	91.32	88.38	91.35	88.06	95.15	90.72	90.35	Sampled By
Date	MW-1	MW-1R	MW-2	MW-2R	MW-3	MW-3RA	MW-3A	MW-4	MW-4R	MW-4A	MW-5	MW-6	MWD-6	MW-7	MW-7R	MWD-7	MW-8	MW-8R	MW-9	MW-9R	MW-10	MW-10R	MW-11	MW-12	MW-15	MW-15R	MW-16	MW-18	MW-18R	MW-22	MW-23	MW-24	
02/23/10-02/24/10	--	76.89	--	75.61	--	74.37	--	--	74.57	--	--	--	--	75.08	--	--	77.62	--	75.26	--	75.26	--	74.40	74.30	75.86	--	--	76.17	--	--	--	--	GAI
4/6-4/7/2010	--	76.19	--	75.41	--	74.52	74.76	--	74.64	74.87	--	--	74.49	--	75.57	--	--	77.02	--	75.50	--	76.12	74.02	74.69	--	74.27	74.17	76.25	75.47	74.75	75.05	76.39	GAI
7/20-7/21/2010	--	79.79	--	77.91	--	--	75.88	--	--	76.37	--	--	75.54	--	78.32	--	--	80.11	--	78.26	--	76.84	--	75.93	--	76.52	76.73	--	77.16	75.85	76.52	77.70	GAI
11/9-11/11/2010	--	79.19	--	78.33	--	76.90	77.18	--	77.74	77.89	--	--	75.44	77.99	78.52	--	79.05	79.18	77.83	78.36	77.58	78.64	77.12	77.18	77.85	76.87	76.58	78.40	77.81	77.20	77.72	79.16	GAI
12/13/10	--	--	--	78.11	--	76.52	--	--	77.19	--	--	--	--	77.45	--	--	--	--	--	--	--	--	--	76.50	--	--	--	--	--	--	--	--	GAI
2/22-2/24/2011	--	77.58	--	76.74	--	--	76.33	--	--	76.93	--	--	75.46	--	77.30	--	--	77.99	--	76.94	--	77.38	76.54	76.01	--	76.07	75.46	--	76.38	76.26	76.40	77.71	GAI
6/21-6/22/2011	--	73.51	--	73.38	--	--	74.86	--	--	74.68	--	--	73.32	--	74.64	--	--	74.20	--	73.73	--	73.97	75.49	74.24	--	74.53	73.78	--	72.76	74.63	74.00	74.01	GAI
12/12-12/13/2011	--	71.34	--	69.88	--	--	72.06	--	--	72.80	--	--	71.79	--	72.78	--	--	72.54	--	70.73	--	71.00	73.05	72.29	--	73.07	72.53	--	71.20	71.67	70.94	71.33	GAI
01/19/12	--	--	--	69.62	--	--	--	--	72.78	72.38	--	--	71.71	--	--	--	--	--	--	70.22	--	--	--	--	--	--	--	--	70.65	71.51	70.51	--	GAI
6/27-6/28/2012	--	69.86	--	68.57	--	--	70.41	--	--	70.48	--	--	69.69	--	70.15	--	--	71.03	--	68.05	--	69.44	71.40	70.69	--	71.98	72.18	--	70.55	69.83	69.09	69.87	GAI
07/25/12	--	69.08	--	--	--	--	--	--	69.93	69.15	--	--	--	--	--	--	--	--	--	68.55	--	--	--	--	--	--	--	--	--	--	--	69.19	GAI
12/10-12/11/2012	--	67.78	--	66.43	--	--	68.23	--	--	68.59	--	--	68.94	--	68.45	--	--	68.74	--	66.90	--	67.46	68.87	68.59	--	69.73	70.06	--	69.65	67.69	67.01	67.70	GAI
01/07/13	--	67.42	--	66.28	--	--	68.30	--	68.50	71.71	--	--	68.65	--	--	--	--	--	--	--	--	--	--	--	--	69.11	--	--	--	--	67.53	--	GAI
03/27/13	--	--	--	--	--	--	--	--	--	--	--	--	--	--	68.22	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	GAI
06/12 - 06/13/13	--	66.68	--	65.49	--	--	72.70	--	--	66.88	--	--	67.40	--	67.13	67.82	--	67.33	--	65.86	--	66.35	67.27	67.26	--	67.32	67.60	--	67.55	66.21	65.70	66.60	GAI
07/19/13	--	--	--	66.46	--	--	67.33	--	--	66.90	--	--	71.71	--	--	--	--	--	--	66.29	--	--	--	--	--	--	70.65	--	68.42	--	--	67.24	GAI
09/25/13	--	--	--	--	--	--	--	--	--	--	--	--	--	--	70.60	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	GAI
12/13 - 12/14/13	--	71.07	--	67.79	--	--	69.25	--	--	69.64	--	--	70.33	--	71.68	70.73	--	72.13	--	68.09	--	68.99	69.72	69.92	--	69.88	70.14	--	70.86	68.49	67.97	70.97	GAI
02/04/14	--	71.63	--	68.40	--	--	69.43	--	--	70.12	--	--	70.53	--	--	--	--	--	--	68.60	--	--	--	70.02	--	--	70.43	--	--	--	--	71.21	GAI
03/21/14	--	71.82	--	68.77	--	--	69.49	--	--	70.43	--	--	70.49	--	72.18	70.95	--	73.24	--	69.10	--	69.93	70.26	69.94	--	70.52	70.84	--	70.82	69.04	68.69	71.61	GAI
6/21 - 6/22/14	--	69.65	--	67.97	--	--	69.39	--	--	69.34	--	--	69.98	--	69.59	69.72	--	70.70	--	68.48	--	69.28	69.95	69.78	--	70.34	70.31	--	70.09	68.87	68.35	69.94	GAI
07/25/14	--	68.95	--	65.68	--	--	--	--	--	66.82	--	--	69.78	--	--	--	--	69.23	--	68.02	--	67.31	--	68.21	--	--	71.04	--	--	--	--	67.92	GAI
09/05/14	--	--	--	--	--	--	--	--	--	--	--	--	--	--	69.10	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	GAI
12/10 - 12/11/14	--	71.80	--	69.17	--	--	70.43	--	--	70.20	--	--	71.16	--	72.15	71.96	--	72.95	--	69.31	--	69.77	70.63	70.72	--	74.19	72.51	--	71.64	69.91	69.15	71.29	GAI
01/13/15	--	73.22	--	69.96	--	--	--	--	--	71.63	--	--	71.86	--	73.39	--	--	--	--	69.79	--	70.50	--	--	--	--	74.45	--	72.33	--	--	72.84	GAI
2/24 - 2/25/15	--	72.95	--	70.26	--	--	71.10	--	--	71.77	--	--	71.86	--	73.12	72.02	--	75.23	--	70.52	--	71.31	71.88	71.61	--	72.98	73.42	--	72.21	70.71	70.33	72.67	GAI
03/25/15	--	73.14	--	70.41	--	--	71.38	--	--	72.09	--	--	75.99	--	73.72	72.03	--	75.23	--	70.71	--	71.59	72.37	71.68	--	73.42	73.88	--	72.21	71.05	70.52	72.90	GAI
04/20 - 4/21/15	--	79.24	--	72.69	--	--	72.00	--	--	73.82	--	--	72.28	--	75.59	73.41	--	79.07	--	72.74	--	72.57	73.33	72.21	--	74.01	73.89	--	73.73	71.81	71.97	75.58	GAI
05/28/15	--	81.73	--	74.63	--	--	73.84	--	--	76.34	--	--	73.34	--	78.27	75.27	--	81.65	--	75.89	--	79.16	75.25	73.55	--	74.97	75.27	--	73.60	74.27	74.07	79.36	GAI
06/22 - 06/26/15	--	82.62	--	76.01	--	--	74.91	--	--	76.66	--	--	74.26	--	79.47	76.90	--	82.51	--	76.19	--	76.02	77.19	75.46	--	77.62	76.81	--	74.57	74.91	75.04	83.89	GAI
7/27 - 7/30/2015	--	78.97	--	75.06	--	--	76.03	--	--	77.21	--	--	75.54	--	78.02	76.09	--	79.63	--	75.26	--	76.13	77.39	75.99	--	77.20	77.17	--	75.66	75.71	75.10	77.45	GAI
8/20-21/2015	--	77.49	--	74.66	--	--	75.75	--	--	76.51	--	--	75.63	--	76.78	75.31	--	77.94	--	74.96	--	75.72	76.88	75.76	--	76.75	77.07	--	75.61	75.36	74.62	77.32	GAI
9/28-29/2015	--	76.65	--	74.51	--	--	75.64	--	--	76.02	--	--	75.95	--	76.15	75.24	--	77.00	--	74.77	--	75.50	76.45	75.86	--	76.74	77.05	--	75.95	75.18	74.56	77.32	GAI
10/19/15	--	76.43	--	74.41	--	--	75.51	--	--	75.85	--	--	75.99	--	76.02	75.13	--	76.80	--	74.66	--	75.40	76.30	75.77	--	76.59	77.03	--	76.07	75.06	74.46	76.36	GAI
11/16/15	--	77.64	--	75.63	--	--	76.34	--	--	76.84	--	--	76.39	--	77.30	75.97	--	78.41	--	75.77	--	76.55	77.05	76.50	--	77.30	76.81	--	76.54	75.72	75.22	77.64	GAI
12/7-10/2015	--	77.17	--	75.40	--	--	76.11	--	--	76.69	--	--	76.02	--	76.95	75.70	--	77.81	--	75.65	--	76.41	76.82	76.19	--	77.10	77.08	--	76.17	75.70	75.29	77.19	GAI
1/25-26/2016	--	76.73	--	75.12	--	--	75.93	--	--	76.47	--	--	75.78	--	76.70	75.25	--	77.28	--	75.30	--	75.96	77.73	76.02	--	76.97	77.05	--	75.79	75.58	75.11	75.68	GAI
02/15/16	--	76.55	--	74.96	--	--	75.87	--	--	76.31	--	--	75.70	--	76.49	75.13	--	77.02	--	75.31	--	75.92	76.59	75.89	--	76.91	76.98	--	75.73	75.51	74.09	76.57	GAI
03/28/16	--	76.08	--	74.61	--	--	75.47	--	--	75.86	--	--	75.29	--	76.01	74.50	--	76.46	--	74.92	--												



TABLE III4E2  
 HISTORICAL GROUNDWATER ELEVATIONS (FT-MSL)  
 PIEZOMETERS

Piezometer	Top of Casing Elevation (ft-msl)	Date																	
		Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Jun-16	Dec-16
		Groundwater Elevation (ft-msl)																	
PZ-101	101.73	68.61	69.79	70.58	71.23	71.77	-	74.13	74.65	74.39	74.24	74.07	74.49	74.63	74.74	74.75	74.63	73.78	72.52
PZ-104	99.02	66.98	67.36	67.95	68.42	69.63	-	74.18	75.41	75.13	74.56	74.14	74.34	74.27	74.08	73.97	73.75	73.20	71.97
PZ-106	88.17	58.98	59.24	59.55	59.77	60.30	-	68.00	65.75	64.25	63.39	63.05	64.17	63.90	63.79	63.75	63.40	62.97	61.47
PZ-113	89.79	70.37	71.03	72.15	72.49	75.49	78.4	80.79	78.07	76.71	75.96	75.75	76.75	76.74	76.70	76.61	76.25	75.49	74.22
PZ-116	96.56	69.7	70.22	70.80	71.21	72.45	-	76.20	76.98	76.84	76.36	76.03	76.27	76.28	76.07	75.94	75.57	75.06	73.65
PZ-118	93.22	62.03	62.24	62.59	62.82	63.51	76.54	66.59	66.68	66.52	68.34	66.04	66.40	66.47	66.71	66.71	66.54	66.17	64.89
PZ-122	96.14	-	56.26	56.55	56.44	57.01	-	-	57.34	-	56.68	56.64	57.19	57.50	57.87	57.96	58.10	58.04	57.14
PZ-124	101.67	67.41	67.68	67.72	67.77	68.11	-	70.60	71.54	71.28	71.45	71.16	71.88	71.73	71.76	71.63	71.36	71.44	70.13
PZ-130	104.39	-	66.36	66.74	67.09	67.29	-	68.44	68.74	68.65	69.16	69.11	69.84	69.84	70.30	70.39	70.14	70.03	69.26
PZ-131	100.09	70.4	68.2	71.44	71.49	72.34	86.47	75.59	76.48	75.77	75.36	75.10	75.70	75.51	75.41	75.31	74.81	74.49	72.92
PZ-133	101.96	78.34	68.8	68.91	69.06	69.44	-	71.54	72.36	72.54	72.74	72.71	73.10	73.10	73.28	73.28	73.18	73.08	72.31
PZ-134	86.11	71.98	72.49	73.02	73.11	80.68	82.66	83.04	78.96	77.31	76.66	76.45	77.39	76.91	76.58	76.40	75.98	74.36	73.06



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 5

# GROUNDWATER CHARACTERIZATION AND MONITORING REPORT

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

INTENDED FOR PERMITTING  
PURPOSES ONLY

July 2017  
Revised: November 2017

Project No. 1401491



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## **EXECUTIVE SUMMARY**

This Groundwater Characterization and Monitoring Report is prepared in accordance with 30 TAC §§330.63(f) and 330.403. This report summarizes available data related to the occurrence and distribution of groundwater, establishes a groundwater monitoring system, and provides a Groundwater Sampling and Analysis Plan (GWSAP).

## 1.0 GROUNDWATER CHARACTERIZATION

Part III.4, Geology Report summarizes available data related to regional and local geology and aquifers in the vicinity of the facility where its appendixes and figures contained within are used to support the following groundwater characterization discussion.

### 1.1 Regional Hydrogeology

#### 1.1.1 Generalized Stratigraphic Column

The generalized stratigraphic column of the area beneath the facility is presented to a depth of approximately 1,600 ft-bgs, which is the base of the Evangeline Aquifer. The Goliad Formation outcrops in the vicinity and is overlain by a veneer of Holocene eolian deposits.

#### 1.1.2 Evangeline Aquifer

Underlying the facility is the Evangeline Aquifer which overlies the Burkeville Confining Unit. The Evangeline Aquifer is composed primarily of the Goliad Sand, but may also contain sections of sand and clay from the Upper Lagarto Formation. It is approximately 1,600 feet thick under the facility and dips towards the coast approaching thicknesses greater than 2,300 ft.

The Evangeline Aquifer generally exhibits under water table conditions, however successions of clay may cause portions to behave as a semi-confined aquifer. Transmissivity values are observed to range from 3,000 to 15,000 ft<sup>2</sup>/day (Chowdhury and Mace, 2007). Average horizontal and vertical hydraulic conductivities are 80 feet/day and  $1 \times 10^{-3}$  feet/day, for horizontal and vertical, respectively (Ryder, 1988).

### 1.2 Local Hydrogeology

#### 1.2.1 Subsurface Stratigraphy

The results of a subsurface investigation demonstrate the facility is underlain by three distinct strata, identified below in order from ground surface down:

- Stratum I: sandy clays or clayey sands, with layers of silty clay, silty sand, or clayey silt.
- Stratum II: sands/silty sands, fine, poorly graded, and is the uppermost water-bearing unit (uppermost aquifer).
- Stratum III: predominantly clay, with some amounts of sandy clay or silty clay, high plasticity, hard, brown, and dry, and is the confining unit underlying the uppermost water-bearing unit (lower confining unit).

### **1.2.2 Uppermost Aquifer**

The second stratigraphic layer, Stratum II, which is composed of sands/silty sands, is the upper water bearing unit at the site (uppermost aquifer). The thickness of the unit varies from 5 to 30 feet, except in portions of the northwest corner of the proposed expansion area where it was not encountered. The extent of this stratum can be seen in Figures III4-12, Interpretive Geology Cross-Sections which depicts the monitoring wells, borings and sub-surface profiles obtained from the soil investigations at the site.

Groundwater occurs primarily within Stratum II, separated from lower aquifers by underlying Stratum III, which acts as an aquiclude. The groundwater within Stratum II is also locally, partially confined by the clayey soils encountered in Stratum I. In other areas, recharge could occur through vertical flows through overlying sandy soils.

## **1.3 Hydraulic Characteristics**

### **1.3.1 Groundwater Flow Direction**

Figures III4-13A through III4-13N, Potentiometric Surfaces demonstrate groundwater flow direction across the facility. Groundwater within the currently permitted area of TCEQ Permit MSW-956B has a very low hydraulic gradient with variable flow directions. Within the expansion area to be included in TCEQ Permit MSW-956C, groundwater flow is predominantly towards the east, northeast, or southeast in subdued conformance to topography.

### **1.3.2 Groundwater Flow Rate**

Groundwater flow rates were estimated for the uppermost aquifer, using estimated average hydraulic gradients, estimated hydraulic conductivities, and effective porosity for silty sand. The estimated groundwater flow rate is 7.4 feet per year within the currently permitted area of TCEQ Permit MSW-956B and 2.0 feet per year within the expansion area to be included in TCEQ Permit MSW-956C.

## **1.4 Groundwater Quality**

### **1.4.1 Regional Groundwater Quality**

Typical range of values for total dissolved solids content of groundwater, mineral constituents dissolved from rocks and soils within the Evangeline Aquifer is 632 – 8,774 mg/L (Young, 2010). A general classification of water based on dissolved solids content is as follows; waters containing less than 1,000 mg/L of dissolved solids are considered fresh; 1,000 to 3,000 mg/L, slightly saline; 3,000 to 10,000 mg/L, moderately saline; 10,000 to 35,000 mg/L, very saline, and more than 35,000 mg/L, brine (Winslow and Kister, 1956, p.5).

### 1.4.2 Local Groundwater Quality

Groundwater quality data from the facility's monitoring wells and piezometers indicate that total dissolved solids content ranges from 690-25,500 mg/L. Therefore, the facility's groundwater quality is considered fresh to saline.

### 1.4.3 Groundwater Monitoring Data

A tabulation of all relevant groundwater monitoring data from wells on site is presented in Part III4F, Historic Groundwater Quality Testing Data. The groundwater monitoring data includes results of all semi-annual and applicable quarterly groundwater monitoring events since 2005.

## 2.0 GROUNDWATER MONITORING

30 TAC §330.401(d)-(f)

To ensure both a conservative approach to groundwater monitoring at the facility and ensure the detection of any contaminants that may potentially be released to the uppermost aquifer, the facility currently monitors the groundwater present in Stratum II at the point of compliance with a well spacing of approximately 600 feet. Once established at a solid waste management unit, groundwater monitoring must be conducted throughout the active life and any required post-closure care period of that solid waste management unit as specified in 30 TAC §330.463.

Groundwater monitoring requirements under 30 TAC §§330.403, 330.405, 330.407, and 330.409 may be suspended by the TCEQ for a solid waste management unit if the City can demonstrate that there is no potential for migration of hazardous constituents from that solid waste management unit to the uppermost aquifer during the active life and the closure and post-closure care period of the unit. This demonstration shall be certified by a qualified groundwater scientist and approved by the TCEQ, and must be based upon:

- site-specific field-collected measurements, sampling, and analysis of physical, chemical, and biological processes affecting contaminant fate and transport; and
- contaminant fate and transport predictions that maximize contaminant migration and consider impacts on human health and the environment.

## 2.1 Groundwater Monitoring Compliance Certification

30 TAC §§330.401(e) & 330.403(e)

For new solid waste management units, the City must submit to the TCEQ a documented certification signed by a qualified groundwater scientist that the facility is in compliance with the groundwater monitoring requirements specified in 30 TAC §§330.403, 330.405, 330.407, and 330.409 prior to waste placement in the unit. The qualified groundwater scientist must also certify the groundwater monitoring system design, including the number, spacing, and depths of monitoring wells and submit the plan for the monitoring system and all supporting data to the TCEQ for review and approval prior to construction of the unit. Within 14 days of the certification, the City shall submit the certification to the TCEQ and place a copy of the certification

### QUALIFIED GROUNDWATER SCIENTIST STATEMENT

I, Chad E. Ireland, am a licensed professional geological engineer in the State of Texas (PE 99293) and a qualified groundwater scientist as defined in 30 TAC §330.3(120); and have reviewed the groundwater monitoring system design (including the number, spacing, and depths of monitoring wells), groundwater sampling and analysis requirements, detection monitoring program, and assessment monitoring program including supporting data contained herein. In my professional opinion, the Edinburg Regional Disposal Facility TCEQ Permit MSW-956C located in Hidalgo County, Texas is in compliance with the groundwater monitoring requirements specified in 30 TAC §§330.403, 330.405, 330.407, and 330.409. The only warranty made by me in connection with this document is that I have used that degree of care and skill ordinarily exercised under similar conditions by reputable members of my profession, practicing in the same or similar locality. No other warranty expressed or implied, is intended.



Signature: \_\_\_\_\_

Chad E. Ireland  
Chad E. Ireland, Texas PE 99293

Date: \_\_\_\_\_

11/7/17

Firm: \_\_\_\_\_

Golder Associates Inc., Texas Registration F-2578  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073

## 2.2 Groundwater Monitoring System

30 TAC §§330.63(f)(4), 330.63(f)(5)(A), 330.63(f)(6)(D), 330.403(a), 330.403(a)(1)-(2), and 330.403(d)

The proposed groundwater monitoring system is designed with of a sufficient number of groundwater monitoring wells located at the point of compliance in accordance to 40 CFR §258.51(a)(2), spaced less than 600 ft apart, and installed at a depth to yield representative groundwater samples from the uppermost aquifer identified as the saturated zone within Stratum II. The point of compliance monitoring system is designed to allow determination of the quality of groundwater passing the point of compliance as defined by 30 TAC §330.3(106) and to ensure the detection of groundwater contamination. As a result of the varying groundwater flow conditions, all of the groundwater monitoring wells are considered to be point of compliance wells and the quality of background groundwater will be determined at each groundwater monitoring well that has not been affected by leakage from a unit. All parts of a groundwater monitoring system shall be operated and maintained so that they perform at least to design specifications through the life of the groundwater monitoring program.

### 2.2.1 Design Considerations

30 TAC §330.403(e)(1)

#### 2.2.1.1 Bottom of Waste Disposal Units Relative to Uppermost Aquifer

The subgrade elevation of the waste disposal units are designed primarily within Stratum I, though it may penetrate into Stratum II, the uppermost aquifer, in portions of Unit 7. Groundwater is encountered at approximately 5 to 35 ft-bgs (elevation of 74 ft-msl to 54 ft-msl), depending on topography and season. Although unlikely, if a release from the Subtitle D waste disposal unit were to occur, the most probable location would be the leachate collection sumps, the lowest excavation point.

#### 2.2.1.2 Groundwater Flow

30 TAC §330.403(e)(3)

Landfill construction and site development activities have modified groundwater flow as an inward gradient towards cell construction activities may modify the groundwater flow direction which is discussion in § 1.3.1 and 1.3.2. The City shall promptly notify the TCEQ, and any local pollution agency with jurisdiction that has requested to be notified, in writing of changes in facility construction or operation or changes in adjacent property that affect or are likely to affect the direction and rate of groundwater flow and the potential for detecting groundwater contamination from a solid waste management unit and that may require the installation of additional monitoring wells or sampling points and that such additional wells or sampling points require a modification of the site development plan.

### 2.2.1.3 Potential Contaminant Pathways

30 TAC §330.63(f)(3)

Although unlikely, if a release from the Subtitle D waste disposal unit were to occur, the most probable contaminant pathway would be either along the interface of the waste disposal unit lining system and the soil interface or downward into Stratum II. In the event that any contaminants were to reach the groundwater, the miscible contaminants would be diluted by the groundwater and would move laterally because of the underlying aquiclude. The direction of lateral movement may fluctuate because of the varying groundwater flow conditions resulting from ongoing construction activities; however any contaminants will be detected by the point of compliance monitoring wells prior to reaching any potential receptors. No critical receptors were identified based on review of the adjacent properties surrounding the facility.

### **2.2.2 Groundwater Monitoring Well Locations**

30 TAC §§330.63(f)(1) & 330.403(b)(1)-(5)

As a result of the bottom of the waste disposal units relative to the uppermost aquifer, groundwater monitoring wells will be screened to include the saturated zone within Stratum II interface allowing for monitoring of groundwater elevations and contaminant levels in the groundwater in the uppermost water-bearing unit. Groundwater monitoring in the low-permeability Stratum III clay is not necessary because migration rates of potential contamination will be very slow and water will preferentially flow within the higher permeability Stratum II. Because of the varying groundwater flow conditions and potential contaminant pathways, all of the groundwater monitoring wells are considered to be point of compliance wells and the quality of background groundwater will be determined at each groundwater monitoring well that has not been affected by leakage from a unit. All monitoring wells have a spacing along the point of compliance of 600 ft. or less.

The layout of the groundwater monitoring system is presented on Figure III5-1, Proposed Groundwater Monitoring System and includes topographic contours of existing conditions, a delineation of the waste management area, the property boundary, the point of compliance, and location of groundwater monitoring wells. The plan depicts groundwater monitoring wells, spaced less than 600 ft apart, along the point of compliance located not greater than 500 ft from the joined solid waste management units within the overall waste management area to effectively monitor groundwater from large portions of the facility.

### 2.2.2.1 Previously Permitted Groundwater Monitoring Well Network

The monitoring well network of TCEQ Permit MSW-956B included 14 wells (MW-1 through MW-14) screened in the upper water-bearing unit. MW-1 through MW-4 were installed in 1993 and MW-5 through MW-8 in 1996. MW-9 through MW-12 and MW-14 were installed in 2000. In 2003, replacement wells MW-1R through MW-4R were installed, followed by further reinstallation of well MW-3RA. In 2005, MW-15 and MW-18 were added to the existing monitoring well system. In 2009, the following wells were replaced/relocated – MW-3A, MW-4A, MW-7R, MW-8R, MW-9R, MW-10R, MW-15R, and MW-18R. In addition, MW-16 and MW-22 through MW-24 were installed in 2009. The Edinburg Sanitary Landfill TCEQ Permit MSW-956B and Type IV Landfill TCEQ Permit MSW-2302 share a common permit boundary along the southwestern portion of the facility. In 2013, wells MWD-6 and MWD-7 were installed along this southern boundary to monitor the same groundwater unit as the Type IV Landfill. These wells are located 30 feet of the southern permit boundary of the Type I landfill. Apart from the wells which were relocated or replaced, wells MW-5, MW-6, and MW-14 were plugged in 2004, 2008, and 2000 respectively. MW-13, MW-14R, MW-17, MW-19, MW-20, and MW-21 are part of the current monitoring well network that are permitted for future installation.

Table III5-1 lists the monitoring wells that are part of the monitoring well network of TCEQ Permit MSW-956B. Appendix III5A, Existing Monitoring Well Information presents the available well installation records for the current and historic monitoring wells.

**Table III5-1: Previously Permitted Groundwater Monitoring Well Network**

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-1R	16,670,451.01	1,104,162.79	84.7	87.5	20	25	64.7	59.7
MW-2R	16,668,465.10	1,103,816.69	86.5	89.4	25	30	61.5	56.5
MW-3A	16,668,167.98	1,105,587.63	95.7	98.4	31	41	64.7	54.7
MW-4A	16,670,162.92	1,105,941.09	87.3	90.0	27	37	60.3	50.3
MWD-6	16,667,949.81	1,106,763.82	90.6	93.5	35	45	55.6	45.6
MWD-7	16,670,250.28	1,105,347.96	85.0	87.7	21	31	65.0	55.0
MW-7R	16,667,810.34	1,107,955.19	86.4	89.2	26	36	60.4	50.4
MW-8R	16,670,347.68	1,104,753.77	85.1	88.3	26	36	59.1	49.1
MW-9R	16,669,023.33	1,103,878.53	86.8	89.8	27	37	59.8	49.8
MW-10R	16,669,618.10	1,103,965.73	88.2	91.0	26	36	62.2	52.2
MW-11	16,670,058.17	1,106,488.44	88.4	91.1	27	37	61.4	51.4
MW-12	16,668,084.93	1,106,178.78	89.8	92.3	30.1	40.1	59.8	49.8
MW-13*	16,667,722.74	1,108,566.75	90.4	-	-	-	-	-

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Revised: November 2017

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-14R*	16,669,889.35	1,108,856.78	96.9	-	-	-	-	-
MW-15R	16,670,041.53	1,107,087.42	88.3	91.3	26.5	36.5	61.8	51.8
MW-16	16,669,923.37	1,107,650.60	85.8	88.4	22	32	63.8	53.8
MW-17*	16,668,909.26	1,108,747.81	83.1	-	-	-	-	-
MW-18R	16,667,902.08	1,107,362.25	85.3	88.1	22	32	63.3	53.3
MW-19*	16,669,975.70	1,108,263.02	102.6	-	-	-	-	-
MW-20*	16,669,502.20	1,108,839.55	84.1	-	-	-	-	-
MW-21*	16,668,316.32	1,108,656.07	94.0	-	-	-	-	-
MW-22	16,668,253.10	1,104,999.75	93.0	95.2	28	38	65.0	55.0
MW-23	16,668,353.05	1,104,406.40	87.9	90.7	17	27	70.9	60.9
MW-24	16,670,208.81	1,104,062.92	87.2	90.4	25	35	62.2	52.2

Note: \*These wells are part of the groundwater monitoring well network approved under TCEQ Permit MSW-956B, but haven't been installed as of the date of this report.

- Coordinates provided in Texas State Plane South Zone NAD83

### 2.2.2.2 Groundwater Monitoring Well Network

The groundwater monitoring system will consist of a total of 38 groundwater monitoring wells requiring modifications to the approved network of monitoring well of TCEQ Permit MSW-956B; retain 12 wells, plug and abandon 12 wells, and install 26 additional wells as depicted on Figure III5-1, Proposed Groundwater Monitoring System. The twelve existing monitoring wells to be properly plugged and abandoned are MW-1R, MW-4A, MW-7R, MW-8R, MW-11, MW-14R, MW-15R, MW-16, MW-17, MW-19, MW-20, and MW-21. The additional 26 monitoring wells to be installed are MW-101 through MW-115 along the northern permit boundary, MW-116 through MW-122 along the eastern permit boundary; and MW-123 through MW-126 along the southern permit boundary. The removal of existing monitoring wells and installation of the additional wells will be sequenced to coincide with the schedule of site development outlined in Part II, Facility Layout. Wells will be installed prior to waste placement in the adjacent disposal unit.

**Table III5-2: Groundwater Monitoring Well Network**

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
<i>Monitoring Wells to Remain</i>								
MW-2R	16,668,465.10	1,103,816.69	86.5	89.4	25	30	61.5	56.5

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-3A	16,668,167.98	1,105,587.63	95.7	98.4	31	41	64.7	54.7
MWD-6	16,667,949.81	1,106,763.82	90.6	93.5	35	45	55.6	45.6
MWD-7	16,670,250.28	1,105,347.96	85.0	87.7	21	31	65.0	55.0
MW-9R	16,669,023.33	1,103,878.53	86.8	89.8	27	37	59.8	49.8
MW-10R	16,669,618.10	1,103,965.73	88.2	91.0	26	36	62.2	52.2
MW-12	16,668,084.93	1,106,178.78	89.8	92.3	30.1	40.1	59.8	49.8
MW-13*	16,667,722.74	1,108,566.75	90.4	-	-	-	-	-
MW-18R	16,667,902.08	1,107,362.25	85.3	88.1	22	32	63.3	53.3
MW-22	16,668,253.10	1,104,999.75	93.0	95.2	28	38	65.0	55.0
MW-23	16,668,353.05	1,104,406.40	87.9	90.7	17	27	70.9	60.9
MW-24	16,670,208.81	1,104,062.92	87.2	90.4	25	35	62.2	52.2
<i>Additional Monitoring Wells to be Installed</i>								
MW-101	16,670,791.71	1,104,169.10	83.4	-	20	30	63.4	53.4
MW-102	16,670,787.29	1,104,623.01	83.6	-	20	30	63.6	53.6
MW-103	16,670,705.22	1,105,156.73	84.0	-	20	30	64.0	54.0
MW-104	16,670,622.82	1,105,690.41	85.3	-	18	28	67.3	57.3
MW-105	16,670,540.42	1,106,224.08	86.9	-	18	28	68.9	58.9
MW-106	16,670,458.17	1,106,757.78	87.5	-	18	28	69.5	59.5
MW-107	16,670,385.39	1,107,290.48	92.2	-	20	30	72.2	62.2
MW-108	16,670,836.34	1,107,371.57	98.7	-	25	35	73.7	63.7
MW-109	16,671,423.26	1,107,462.38	93.5	-	30	40	63.5	53.5
MW-110	16,671,972.46	1,107,598.57	95.9	-	25	35	70.9	60.9
MW-111	16,671,885.23	1,108,177.04	92.1	-	25	35	67.1	57.1
MW-112	16,671,798.19	1,108,752.57	90.6	-	34	44	56.6	46.6
MW-113	16,671,708.81	1,109,334.62	95.3	-	33	43	62.3	52.3
MW-114	16,671,620.14	1,109,912.86	85.8	-	28	38	57.8	47.8
MW-115	16,671,531.11	1,110,492.95	82.2	-	25	35	57.2	47.2
MW-116	16,670,961.59	1,110,572.09	88.4	-	25	35	63.4	53.4
MW-117	16,670,387.13	1,110,597.01	87.6	-	30	40	57.6	47.6
MW-118	16,669,812.67	1,110,621.93	88.7	-	20	30	68.7	58.7
MW-119	16,669,402.58	1,110,842.39	92.6	-	35	45	57.6	47.6
MW-120	16,668,987.79	1,111,045.55	93.8	-	40	50	53.8	43.8
MW-121	16,668,413.22	1,111,067.56	96.3	-	40	50	56.3	46.3
MW-122	16,667,838.65	1,111,089.58	99.4	-	40	50	59.4	49.4
MW-123	16,667,379.28	1,110,767.39	98.7	-	43	53	55.7	45.7
MW-124	16,667,461.31	1,110,228.55	97.6	-	43	53	54.6	44.6

Well ID	Northing (ft) <sup>1</sup>	Easting (ft) <sup>1</sup>	Ground Elevation	Top of Casing	Depth of Screened Interval		Elevation of Screened Interval	
			ft-msl	ft-msl	ft-bgs		ft-msl	
					Top	Bottom	Top	Bottom
MW-125	16,667,549.21	1,109,660.31	93.7	-	43	53	50.7	40.7
MW-126	16,667,637.14	1,109,092.08	96.8	-	45	55	51.8	41.8

Note:

\*These wells are part of the groundwater monitoring well network approved under TCEQ Permit MSW-956B, but haven't been installed as of the date of this report.

- Anticipated construction details are provided for additional monitoring wells to be installed and are estimates inferred from cross-sections presented in Part III4, Geology Report. Actual screen depths need to be determined based on field observations during borehole drilling.

1. Coordinates provided in Texas State Plane South Zone NAD83

### 2.2.3 Monitoring Well Construction

30 TAC §330.421(a)

Monitoring well construction shall provide for maintenance of the integrity of the bore hole, collection of representative groundwater samples from the water-bearing zone of concern, and prevention of migration of groundwater and surface water within the bore hole. The following specifications must be used for the installation of groundwater monitoring wells at municipal solid waste landfills. Equivalent alternatives to these specifications may be used if prior written approval is obtained in advance from the TCEQ. Figure III5-2, Proposed Monitoring Well Construction Details present the required specifications for installation of a monitoring well.

Damaged monitoring wells that are no longer usable will be reported to the TCEQ Executive Director for a determination whether to replace or repair the well. In accordance with 30 TAC §305.70(j), if a compromised well requires replacement, a permit modification request will be submitted within 45 days of the discovery. Plugging and abandoning of monitoring wells will be performed in accordance with 16 TAC §76.104. No abandonment will be performed without prior written authorization from the TCEQ.

#### 2.2.3.1 Drilling

30 TAC §330.421(a)(1)(A)-(D)

Monitoring wells must be drilled by a Texas-licensed driller who is qualified to drill and install monitoring wells. The installation and development shall be supervised by a licensed professional geoscientist or engineer who is familiar with the geology of the area and a log of the boring shall be completed, sealed, signed, and dated by the licensed professional.

The well shall be drilled by a method that will allow installation of the casing, screen, etc., and that will not introduce contaminants into the borehole or casing. Drilling techniques used for boring shall take into account the materials to be drilled, depth to groundwater, total depth of the hole, adequate soil sampling, and other such factors that affect the selection of the drilling method. The diameter of the boring shall be at least four inches larger than the diameter of the casing. In the event that a boring is advanced through hard rock, a smaller annulus may be approved by the TCEQ.

If any fluids are necessary in drilling or installation, then clean, treated city water shall be used; other fluids must be approved in writing by the TCEQ before use. If city water is used, a current chemical analysis of the city water shall be provided with the monitor-well report.

#### 2.2.3.2 Casing, Screen, Filter Pack, and Seals

30 TAC §330.421(a)(2)

##### 2.2.3.2.1 Casing

30 TAC §330.421(a)(2)(A)

The well casing shall be: two to four inches in diameter; National Science Foundation-certified polyvinyl chloride (PVC) Schedule 40 or 80 pipe, flush-thread, screw joint (no glue or solvents); polytetrafluoroethylene (PTFE, such as Teflon) tape or O-rings in the joints; no collar couplings. The top of the casing shall be at least two feet above ground level. Where high levels of volatile organic compounds or corrosive compounds are anticipated, stainless steel or PTFE casing and screen may be used, subject to approval by the TCEQ. A two- inch to four-inch diameter casing is recommended. The casing shall be cleaned and packaged at the place of manufacture; the packaging shall include a PVC wrapping on each section of casing to keep it from being contaminated prior to installation. The casing shall be free of ink, labels, or other markings. The casing (and screen) shall be centered in the hole to allow installation of a good filter pack and annular seal. Centralizers are recommended on wells over six meters (20 feet) in length, but may not be needed if the wells are installed through hollow-stem augers. The top of the casing shall be protected by a threaded or slip-on top cap or by a sealing cap or screw-plug seal inserted into the top of the casing. The cap shall be vented to prevent buildup of methane or other gases and shall be designed to prevent moisture from entering the well.

##### 2.2.3.2.2 Screen

30 TAC §330.421(a)(2)(B)

The well screen shall be compatible with the casing and should generally be of the same material. The screen shall not involve the use of any glues or solvents for construction. A wire-wound screen is

recommended to provide maximum inflow area. Field-cut slots are not permitted for well screen. Filter cloth shall not be used. A blank-pipe sediment trap, typically one to two feet, should be installed below the screen. A bottom cap will be placed on the bottom of the sediment trap. The sediment trap shall not extend through the lower confining layer of the water-bearing zone being monitored. Screen sterilization methods are the same as those for casing. Selection of the size of the screen opening should be done by a person experienced with such work and shall include consideration of the distribution of particle sizes both in the water-bearing zone and in the filter pack surrounding the screen. The screen opening shall not be larger than the smallest fraction of the filter pack.

#### 2.2.3.2.3 Filter Pack

30 TAC §330.421(a)(2)(C)

The filter pack, placed between the screen and the well bore, shall consist of prepackaged, inert, clean silica sand or glass beads; it shall extend from one to four feet above the top of the screen. Open stockpile sources of sand or gravel are not permitted. The filter pack usually has a 30% finer grain size that is about four to ten times larger than the 30% finer grain size of the water-bearing zone; the filter pack should have a uniformity coefficient less than 2.5.

#### 2.2.3.2.4 Annular Seal

30 TAC §330.421(a)(2)(D)

The annular seal shall be placed on top of the filter pack and shall be at least two feet thick. It should be placed in the zone of saturation to maintain hydration. The seal should be composed of coarse-grain sodium bentonite, coarse-grit sodium bentonite, or bentonite grout. Special care should be taken to ensure that fine material or grout does not plug the underlying filter pack. Placement of one foot of prepackaged clean fine sand on top of the filter pack will help to prevent migration of the annular seal material into the filter pack. The bentonite shall be hydrated with clean water prior to any further activities on the well and left to stand until hydration is complete (eight to 12 hours, depending on the grain size of the bentonite). If a bentonite-grout (without cement) casing seal is used in the well bore, then it may replace the annular seal described in this paragraph.

#### 2.2.3.2.5 Casing Seal

30 TAC §330.421(a)(2)(E)

A casing seal shall be placed on top of the annular seal to prevent fluids and contaminants from entering the borehole from the surface. The casing seal shall consist of a commercial bentonite grout or a cement-bentonite mixture. Drilling spoil, cuttings, or other native materials are not permitted for use as

a casing seal. Quick-setting cements are not permitted for use because contaminants may leach from them into the groundwater. The top of the casing seal shall be between five and two feet from the surface.

#### 2.2.3.3 Concrete Pad

30 TAC §330.421(a)(3)

High-quality structural-type concrete shall be placed from the top of the casing seal (two to five feet below the surface) continuously to the top of the ground to form a pad at the surface. This formed surface pad shall be at least six inches thick and not less than four (preferably six) feet square or five (preferably six) feet in diameter. The pad shall contain sufficient reinforcing steel to ensure its structural integrity in the event that soil support is lost. The top of the pad shall slope away from the well bore to the edges to prevent ponding of water around the casing or collar.

#### 2.2.3.4 Protective Collar

30 TAC §330.421(a)(4)

A steel or aluminum protective pipe collar shall be placed around the casing "stickup" to protect it from damage and unwanted entry. The collar shall be set at least one foot into the surface pad during its construction and should extend at least three inches above the top of the well casing (and top cap, if present). The top of the collar shall have a lockable hinged top flap or cover. A sturdy lock shall be installed, maintained in working order, and kept locked when the well is not being bailed/purged or sampled. The well number or other designation shall be marked permanently on the protective steel collar; it is useful to mark the total depth of the well and its elevation on the collar.

#### 2.2.3.5 Protective Barrier

30 TAC §330.421(a)(5)

Where monitoring wells are likely to be damaged by moving equipment or are located in heavily traveled areas, a protective barrier shall be installed. A typical barrier is three or four six- to 12-inch diameter pipes set in concrete just off the protective pad. The pipes can be joined by pipes welded between them, but consideration must be given to well access for sampling and other activities. Separation of such a pipe barrier from the pad means that the barrier can be damaged without risk to the pad and well. Other types of barriers may be approved by the TCEQ.

#### 2.2.3.6 Unusual Conditions

30 TAC §330.421(b)

Where monitoring wells are installed in unusual conditions, all aspects of the installation shall be approved in writing in advance by the TCEQ. Such aspects include, for example, the use of cellar-type enclosures for the top-well equipment or multiple completions in a single hole.

#### 2.2.3.7 Development

30 TAC §330.421(c)

After a monitoring well is installed, it shall be developed to remove artifacts of drilling (clay films, bentonite pellets in the casing, etc.) and to open the water-bearing zone for maximum flow into the well. Development should continue until all of the water used or affected during drilling activities has been removed and field measurements of pH, specific conductance, and temperature have stabilized. Failure to develop a well properly may result in improper monitoring of the water-bearing zone or in adequate water for sampling even though the water-bearing zone is prolific.

#### 2.2.3.8 Location and Elevation

30 TAC §330.421(d)

Upon completion of installation of a monitoring well, the location of the well and all appropriate elevations associated with the top-well equipment shall be surveyed by a registered professional surveyor. The elevation shall be surveyed to the nearest 0.01 foot above mean sea level (with year of the sea-level datum shown). The point on the well casing for which the elevation was determined shall be permanently marked on the casing. The location shall be given in terms of the latitude and longitude at least to the nearest tenth of a second or shall be accurately located with respect to the landfill grid system described in Part IV, Site Operating Plan, §4.11, Landfill Markers and Benchmark.

#### 2.2.3.9 Reporting

30 TAC §330.421(e)

Monitoring well installation and construction details must be submitted on forms available from the TCEQ and must be completed and submitted within 60 days of well completion. A copy of the detailed geologic log of the boring, a description of development procedures, any particle size or other sample data from the well, and a site map drawn to scale showing the location of all monitoring wells and the point of compliance must be submitted to the TCEQ at the same time. The licensed driller should be

familiar with the forms required by other agencies; a copy of those forms must also be submitted to the TCEQ.

### **2.3 Groundwater Sampling and Analysis Requirements**

Groundwater sampling and analytical testing will be performed in accordance with the Appendix III5B, Groundwater Sampling and Analysis Plan (GWSAP). The GWSAP includes procedures for the sampling of groundwater at each monitoring well within the groundwater monitoring system and for laboratory analysis. The plan establishes a detection monitoring program and an assessment monitoring program as well as methods to be used to evaluate groundwater monitoring data.

### **2.4 Evaluation of Historical Groundwater Monitoring Data**

The facility began detection monitoring with the first quarterly sampling event in 1999. Part III4F, Historic Groundwater Quality Testing Data is a tabulation of available groundwater analytical test results from quarterly background and semi-annual detection monitoring events since 2005.

#### **2.4.1 Historical Statistically Significant Increases**

To provide a relevant historical account of the statistically significant increases (SSIs) at the facility within the last 10 years, detections for inorganic metal constituents above current background concentrations for each individual groundwater monitoring well and detections for volatile organic compounds (VOCs) above the TCEQ recommended Municipal Solid Waste Practical Quantitation Limits (MSW-PQL) are presented in Appendix III5C, Historical Statistically Significant Increases (SSI).

Every detection for inorganic metal constituents above background was followed by either verification resampling and / or an alternate source demonstration (ASD). If the verification resampling demonstrated constituent levels lower than background value, then the measurements were excluded from Appendix III5C. Therefore, all historical SSIs for inorganic metal constituents have a demonstration of an alternative source other than the landfill that has been accepted by the TCEQ.

Every detection for VOCs was followed by verification resampling, have been recorded and accepted by the TCEQ as anomalous measurements, or the approved assessment monitoring program was initiated for the groundwater monitoring well of concern. If VOCs detections were determined to be anomalous, then the measurements were excluded from Appendix III5C. Therefore, all historical SSIs for VOCs have been evaluated under the assessment monitoring program.

#### 2.4.2 Assessment Monitoring

30 TAC §330.63(f)(6)(B)

The assessment monitoring program has been initiated for groundwater monitoring wells MW-4A and MW-22 because VOCs above the MSW-PQL were detected and verified. As shown in Appendix III5C, monitoring well MW-4A contained VOC detections above the MSW-PQL for benzene, 1,4-Dichlorobenzene, 1,1-Dichloroethane, cis-1,2-Dichloroethene, Tetrachloroethene, Trichloroethylene, and Vinyl Chloride. MW-4A and two adjacent monitoring wells, MW-7R and MW-11, were sampled and tested for 40 CFR Part 258, Appendix II Constituents in March 2014 and resulted in no detections in the additional constituents. MW-22 had VOC detections above the MSW-PQL for cis-1,2-Dichloroethene. MW-22 and two adjacent monitoring wells MW-3A and MW-23 were sampled and tested for 40 CFR Part 258, Appendix II Constituents in December 2015 and resulted in no detections in the additional constituents.

#### 2.4.3 Source of Contamination

30 TAC §§330.63(f)(2), 330.63(f)(2)(A), & 330.63(f)(2)(B)

A contamination plume is body of ground water containing contaminants, emanating and migrating from a point source within a hydrogeologic unit. Although VOCs have been detected in MW-4A and MW-22, the point source of VOC contamination has not been conclusively identified nor determined to be from the facility's waste management unit. In addition, adjacent monitoring wells to those of concern have been sampled and tested with analytical results showing no detections of VOCs. Because the point source, extent, migration direction, and maximum concentration of VOCs cannot be adequately assessed from the available data, a contamination plume cannot be delineated other than to the extent of the adjacent wells that show no detections.

In a proactive effort to address the potential source of the VOCs detected in MW-4A and MW-22, the City installed passive gas vent trenches between both monitoring wells and the existing waste footprint in March 2016. These passive gas vent trenches extended both 50 feet east and west, on either side of the monitoring well, to collect and passively vent any migrating landfill gas that could be contributing to the detection of VOCs. Since their installation, MW-4A analytical results have demonstrated no VOC detections for two consecutive semi-annual monitoring events and therefore the well is no longer in assessment monitoring.

Conversely, the analytical results for MW-22 show an increase in concentration for cis-1,2-Dichloroethene. The effectiveness of the passive gas vent trench installed for the monitoring well was evaluated. A review of its as-built construction revealed the trench was not installed at an adequate

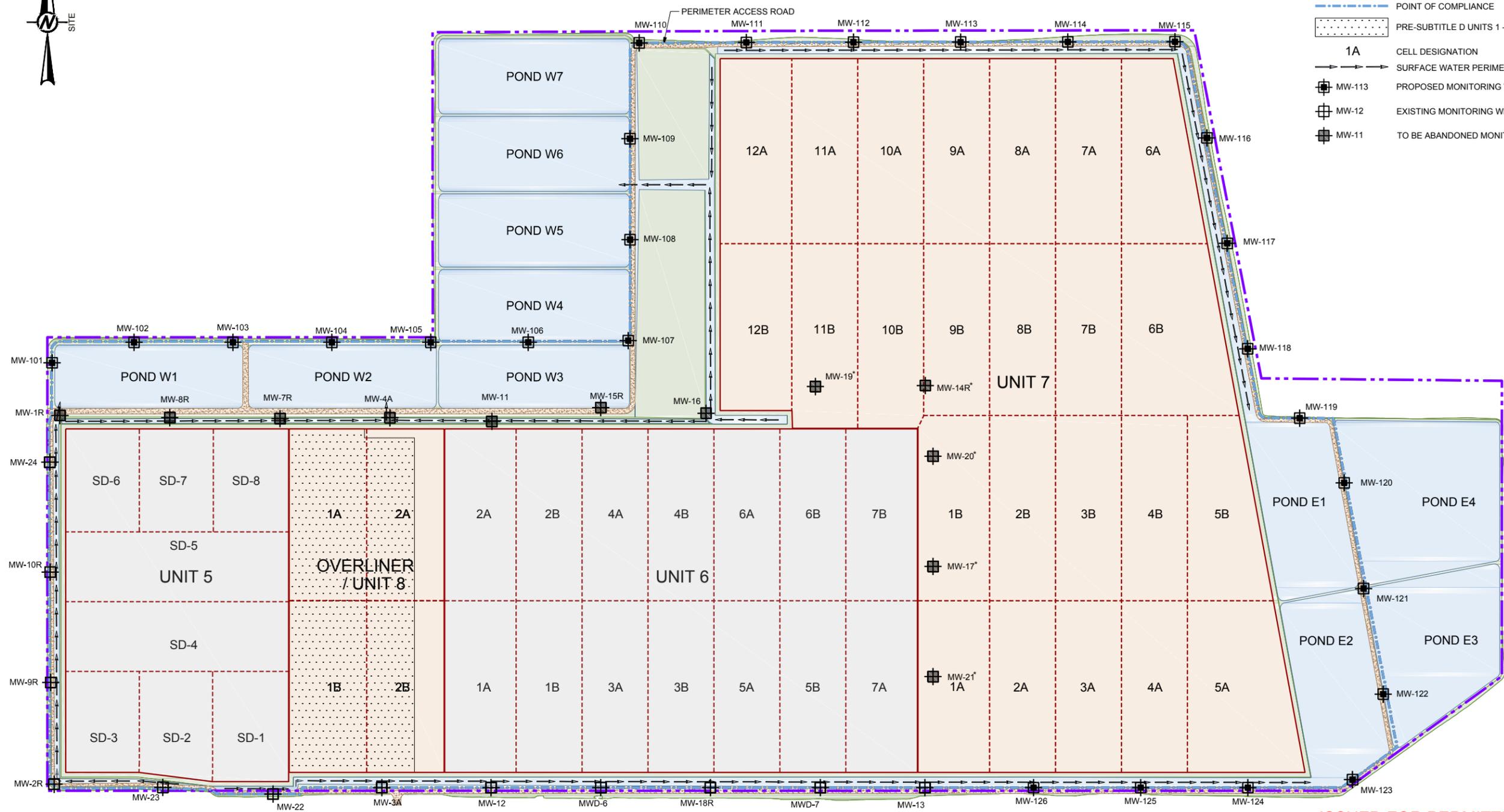
depth to intercept migrating landfill gas that may exist directly above the groundwater surface. Consequently, the City reinstalled the passive gas vent trench to a depth below the existing groundwater surface in March 2017. MW-22 to date is in assessment monitoring and analytical results of further groundwater monitoring will determine if the reinstallation of the passive gas vent trench adequately mitigates the VOCs detected.

### 3.0 REFERENCES

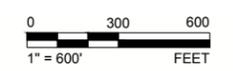
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- LEGEND**
- PERMIT BOUNDARY
  - UNIT BOUNDARY
  - CELL DIVISION
  - POINT OF COMPLIANCE
  - PRE-SUBTITLE D UNITS 1 - 4
  - 1A** CELL DESIGNATION
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
  - MW-113 PROPOSED MONITORING WELL
  - MW-12 EXISTING MONITORING WELL
  - MW-11 TO BE ABANDONED MONITORING WELLS



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	JAW	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JAW	CEI

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

Golder Associates

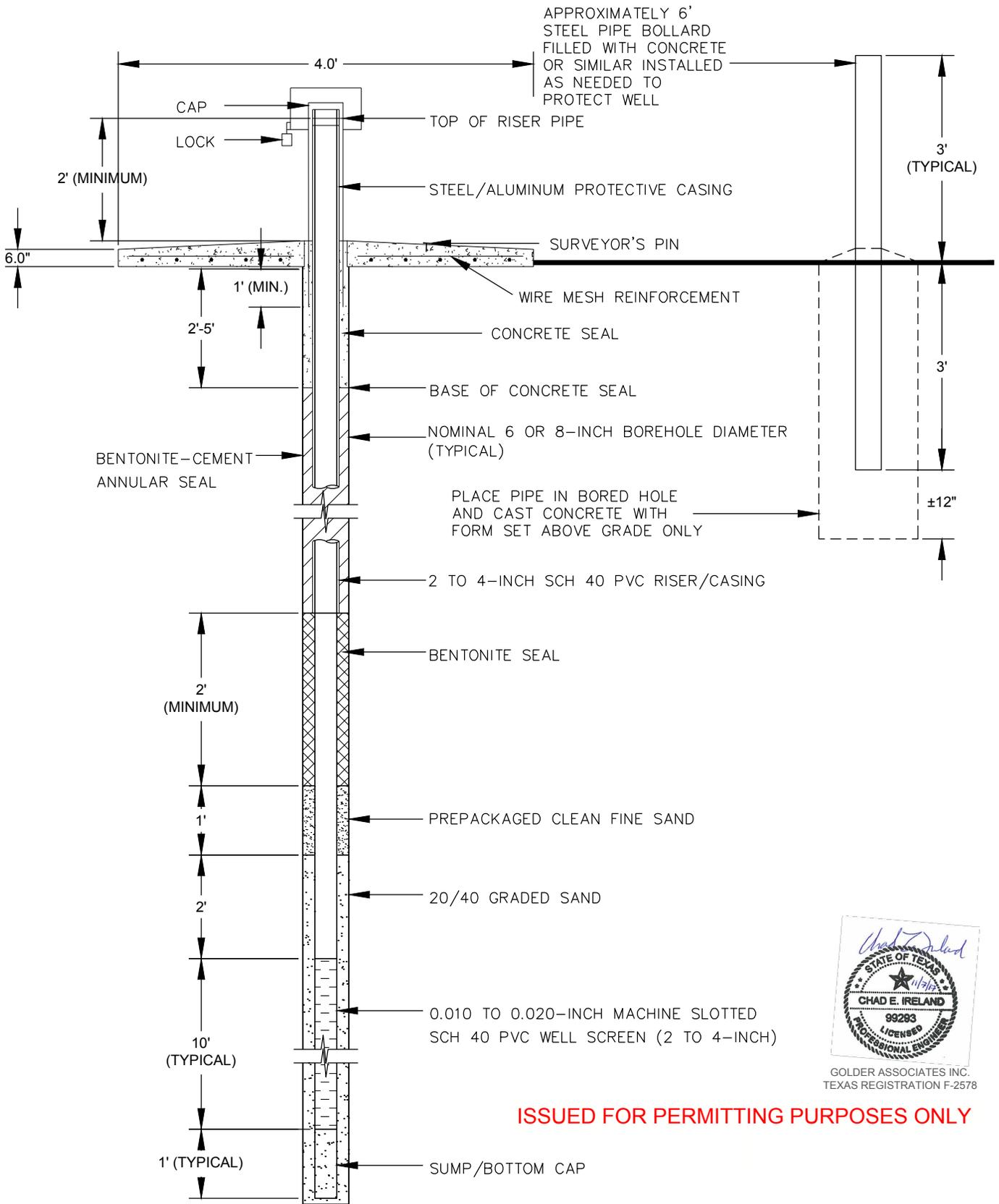
HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**GROUNDWATER MONITORING SYSTEM PLAN**

PROJECT NO. 1401491	APPLICATION SECTION III5	REV. 1	1 of 2	FIGURE III5-1
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



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<b>CLIENT</b> 		<b>PROJECT</b> EDINBURG REGIONAL DISPOSAL FACILITY PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C EDINBURG, HIDALGO COUNTY, TEXAS	
<b>CONSULTANT</b> 		YYYY-MM-DD    2017-11-07 DESIGNED        CEI PREPARED        AA REVIEWED        JAW APPROVED        CEI	<b>TITLE</b> <b>PROPOSED MONITORING WELL COSTRUCTION DETAILS</b>
PROJECT NO.	APPLICATION SECTION	REV.	FIGURE
1401491	III5	1	2 of 2 III5-2

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PERMIT AMENDMENT APPLICATION  
Part III, Attachment 5, Appendix B

# GROUNDWATER SAMPLING AND ANALYSIS PLAN (GWSAP)

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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July 2017  
Revised: November 2017

Project No. 1401491



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## **EXECUTIVE SUMMARY**

30 TAC §§330.63(f), 330.405(a), and 330.405(b)

This Groundwater Sampling and Analysis Plan (GWSAP) is prepared in accordance with 30 TAC §330 Subchapter J relating to Groundwater Monitoring and Corrective Action and includes consistent sampling and analysis procedures that are designed to ensure monitoring results that provide an accurate representation of groundwater quality at the background and groundwater monitoring wells installed in compliance with 30 TAC §330.403(a) – (c). The City of Edinburg (City) shall submit this plan to the TCEQ for review and approval prior to commencement of sampling and shall maintain a current copy in the Site Operation Record (SOR).

## 1.0 GROUNDWATER SAMPLING AND ANALYSIS PROCEDURES

30 TAC §§330.63(f)(6)(E), 330.405(a), 330.405(b)(1), 330.405(b)(3), and 330.405(b)(3)(A)

Consistent analysis procedures are designed to ensure monitoring results that provide an accurate representation of groundwater quality at the groundwater monitor wells. These sampling and analytical methods are appropriate for groundwater sampling and that accurately measure hazardous constituents and other monitoring parameters in groundwater samples. Provided within this section of the GWSAP are procedures and techniques for sample collection, sample preservation and shipment, analytical procedures, chain of custody controls, and quality assurance and quality control. The City shall collect an appropriate number of samples necessary to establish groundwater quality data consistent with the appropriate statistical procedures for detection, assessment, and corrective measures.

### 1.1 Groundwater Sampling Procedures

#### 1.1.1 Well Inspection

Prior to performing any purging or sampling, each monitoring well will be inspected to assess its integrity. The visual inspection will include the well lock, static water level measuring mark, protective steel casing, concrete pad, and monitor well casing for signs of damage by vandalism, animals, heavy equipment, or other causes. The objective of the visual inspection is to confirm that no outside constituents or other conditions exist that may affect the quality of the sampling. All necessary repairs or maintenance that can be accomplished without a TCEQ modification request will be conducted immediately by the City and documented on the Field Sampling Data Sheet for that well. If it is determined that the integrity of the well has been, or may have been, compromised the necessary information will be documented and the Executive Director of the TCEQ notified. No additional actions will be taken without the approval of the TCEQ.

#### 1.1.2 Sample Collection

##### 1.1.2.1 Equipment Decontamination

All equipment used for water-level measurement, purging, and/or the collection of groundwater samples will be decontaminated prior to use at each well location, unless the equipment is dedicated to a specific well. Appropriate decontamination procedures consists of scrubbing all equipment with a solution of Alconox® or equivalent laboratory grade detergent and deionized, tap, or distilled water, then triple rinsing with deionized or distilled water. Separate containers for each rinsate will be individually set up at each monitor well. At the conclusion of the sampling, all the rinsate will be properly disposed with the water generated during purging.

### 1.1.2.2 Calibration of Field Measurement Devices

Prior to use, all portable field measurement instrumentation, including the turbidimeter and the temperature, conductivity, and pH probes will be accurately calibrated on-site according to manufacturer's specifications. The probes will first be decontaminated to remove foreign material that may have accumulated on their components since their previous use. As recommended by the manufacturer, the probe's accuracy should first be verified and adjusted accordingly. Typically, conductivity probes are factory calibrated, but the accuracy should be confirmed in the field with a solution of known conductance, preferably in the range anticipated in the samples. The pH meter will first be standardized in the field by placing its probe in a neutral reference buffer solution (pH=7), adjusting as necessary, and then rinsed with deionized water. The probe will then be placed in a pH reference buffer solution of either 4 or 10, depending on the pH range anticipated in the samples to be collected, and adjusted accordingly.

Prior to each sampling event, the water depth indicator probe shall be inspected for any damage and for proper operation. In addition, it should be periodically verified for accuracy by a comparison to a calibrated tape.

### 1.1.2.3 Water Level Measurements

30 TAC §330.405(b)(2)

Groundwater elevations shall be measured at each sampling point prior to bailing or purging; measurement at an event shall be accomplished within a 48 hour period to avoid temporal variations in water levels; sampling at each event shall proceed from the point with the highest water-level elevation to those with successively lower elevations unless contamination is known to be present, in which case wells not likely to be contaminated shall be sampled prior to those that are known to be contaminated.

The static water level below the top of well casing and the total depth of the well will be measured and recorded in the field logbook. Depth measurements will be to the nearest 0.01 foot (ft). Depth measurements will be taken from the north side, top of the well casing at the "permanent measurement mark" each time a measurement is taken. The depth measurement probe will be decontaminated prior to use in each well. A functionality check will consist of dipping the probe into deionized water to see if the alarm sounds at the appropriate time. A visual check of the probe's condition and the condition of the tape and handle will be made when the measurements are being taken. Notation will be made of any minor damage or irregularities on the water level measurement device. If the tape appears to be elongated, kinked, or twisted, then the tape will be checked against a functional tape to determine if there are any discrepancies in the measurements. If the tape is determined to be non-functional due to elongation and/or damage, it will be replaced.

Using the surveyed elevation of the Top of Casing (referenced to mean sea level (msl)), depth to water measurements can be converted to water-level elevations (hydraulic head) by subtracting the depth to static water from Top of Casing (TOC) elevation.

$$\text{Water-Level Elevation (ft msl)} = \text{TOC (ft msl)} - \text{Depth to Static Water (ft)}$$

#### 1.1.2.4 Field Sampling Data Sheets and Groundwater Sampling Field Report

A summary of all field activities including date, project name, weather conditions, sampling personnel, purpose of sampling, and site observations will be recorded on the Appendix III5B-1, Groundwater Field Sampling Data Sheet.

#### 1.1.2.5 Purging or Bailing

Personnel performing water level measurements, well purging, or sampling will wear latex or nitrile gloves. The gloves will be changed when they become damaged and when activities begin at a different well location.

The following procedures will be followed for purging or bailing each monitor well prior to sampling:

- Prior to purging the wells, the volume of water in the well casing will be calculated based on the static water level, well casing diameter, and total depth measurements.
- The area around the well will be set-up to minimize potential contamination from the surroundings. If sampling equipment is to be set down, it should be placed on polyethylene sheeting to prevent contamination.
- The monitor well will be purged until a minimum of three well casing volumes of water has been purged, the well has been pumped dry, or until an appropriate amount of water has been purged to achieve the collection of a representative sample.
- A representative sample is considered when the field parameters of temperature, pH, and specific conductivity of the water have stabilized. The field parameters will be considered stable when three consecutive field measurements, taken at least 3- 5 minutes apart, are within 10% of each reading.
- When using a non-dedicated pump to purge the well, the pump intake should be located below, but near the static groundwater depth to allow for the collection of all potential types of contaminants that may exist in the groundwater. Non-dedicated pumps (if used) will be completely decontaminated before using in another well.
- A low flow purging method will be used and the water drawn from the well will be pumped at a rate no more than 500 mL/min.
- Purged effluent will be stored, transported, and disposed of appropriately. The purged water removed from each well will be containerized until the results of the analysis are known. If analytical results indicate contaminants are below the Maximum Contaminant Level (MCL) for constituents that have an MCL and below detection limits for constituents without MCL's, then the water may be discharged into the site's storm water management system. If levels of contamination are above the MCL's or detection limits, the water will be managed as leachate and handled in accordance with the facility's leachate management plan. If required, due to a hazardous classification, the water will be transported and disposed of at a hazardous waste permitted facility.

- Extremely slow recharging wells will be purged dry. The total amount of purged water will be measured and recorded.

The following purging information for each well will be noted and recorded on the sampling field sheet:

- Well number
- Well casing diameter
- Current outside temperature and weather conditions
- Well inspection information
- Date and time
- Static water level and total depth of well
- Height of water column and well casing volume
- Purging discharge rate, well purging time, volume of water purged
- In situ water quality measurements (temperature, pH, specific conductivity and turbidity)

#### 1.1.2.6 Well Sampling

30 TAC §330.405(c)

Sampling personnel will wear nitrile, latex, or other equivalent non-powdered gloves during sampling to avoid contamination to the samples. Generally wells should be sampled within 24 hours of purging the well to obtain a representative groundwater sample. Sampling procedures will follow the low-flow sampling method demonstrated in the Low-Flow Purging and Sampling Demonstration Report dated July 1, 2009. The pump flow rate for the dedicated bladder pump is to be no more than 500 ml per minute. For the collection of the VOCs, the pump flow rate will be adjusted to less than 100 ml per minute. For wells with non-dedicated pumps, the wells will be sampled using a single-use, disposable bailer. Groundwater samples shall not be field-filtered prior to laboratory analysis.

- **Metals** are to be collected in a high density polyethylene (HDPE) or glass container that is preserved with nitric acid (HNO<sub>3</sub>) to a pH < 2, and immediately chilled to four degrees Celsius (4°C).
- **Other Parameters** are to be collected in polyethylene or glass containers, and immediately chilled to four degrees Celsius (4°C).
- **Volatile Organic Compounds (VOCs)** are to be collected in 40-mL VOA vials that are preserved with hydrochloric acid (HCl) and immediately chilled to four degrees Celsius (4°C). There is to be no headspace or air bubbles when the sample is collected.

As each sample container is filled, the sampling time will be recorded on the sampling field sheet and the container will be labeled with the following information:

- Facility name and/or owner (i.e. City of Edinburg Landfill)
- Monitoring well number (i.e., MW-1)
- Sample date and time
- Preservatives utilized

- Sampler's signature or initials

### 1.1.3 Sample Preservation

The proper container, preservation technique, and maximum holding times shall be in accordance with the requirements identified in the U.S. EPA Publication No., SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods). Preservation of samples may be conducted in the field immediately after the container is filled or the sample container can be pre-preserved by the laboratory in advance of the sampling event based on the specific testing required. The only exception will be for the analyses of volatile organic compounds, in which case the sample containers will always be pre-preserved by the laboratory.

### 1.1.4 Quality Assurance / Quality Control Samples

To document that sample collection and handling procedures have not affected the quality of the groundwater samples, QA/QC samples shall be prepared and analyzed as detailed below:

- **Equipment Blank:** Following decontamination of all non-dedicated or disposable sampling equipment, and prior to sample collection, reagent-grade water will be run over the sampling equipment and the rinsate will be collected in a clean container labeled as an Equipment Blank. A minimum of one equipment blank will be collected each day. This sample will be analyzed for all detection monitoring constituents, to measure the effectiveness of the decontamination procedure in removing contaminants from one sample collection point to another.
- **Field Blank:** A field blank will be prepared in the field by pouring reagent-grade water into empty sample containers. This procedure shall be conducted on the downwind side of the facility or in another appropriate location that is the most representative of site sampling conditions. A minimum of one field blank will be collected per day. The sample will be analyzed for VOCs only and will verify field sampling procedures and check for the presence of airborne contaminants that may be present at the well site.
- **Trip Blank:** A minimum of one Trip Blank per sampling event and/or number of coolers containing VOC samples (whichever is greater) will be prepared by the laboratory with reagent-grade water, and shall accompany the VOC sample container coolers during site activities, but never opened. This blank will be analyzed for VOCs only to determine if any of the samples and/or containers have become contaminated before, during, or subsequent to the sampling event prior to laboratory analysis.
- **Field Duplicates:** One (1) Field Duplicate will be collected per day. The duplicate samples are prepared by collecting two samples from the same monitor well during the same sample collection period. One of the samples will be labeled as duplicate (i.e. DUP-01) so the laboratory is unaware of the relationship between the two samples. The field personnel will note which well was duplicated on their field forms. The duplicate will be analyzed for all detection monitoring constituents. The purpose of this sample is to check the reliability (precision and accuracy) of the laboratory's techniques.

### 1.1.5 Sample Shipment

Subsequent to field activities, all samples collected shall be preserved as appropriate, and immediately transported to the laboratory within the required holding times, dictated by the specific analytical methods. To maintain sample integrity, the samples shall be kept in appropriate portable coolers that have a constant interior temperature of 4°C, protect samples from sunlight, and minimize the risk of sample container

breakage. Under no circumstances shall dry ice be used as the chilling agent for sample preservation; dry ice has the potential to freeze samples, which can result in container breakage (i.e., glass containers may shatter). Custody seals will be placed on the coolers and will not be broken until the samples arrive in the analytical laboratory and are checked in by the laboratory personnel.

If samples are shipped by common carrier, the COC form will be completed with the signature of the relinquisher and the date and time relinquished. The COC is then placed in a sealable plastic storage bag and placed in the sample cooler. At the time and place of receipt of the samples, the receiving party will attach a copy of the bill of lading to the COC document.

### 1.1.5.1 Chain of Custody

The primary objective of the chain-of-custody is to create an accurately written and verified record that can be used to trace the possession and handling of the samples from the moment of collection until receipt by the laboratory. Adequate sample custody will be achieved by proper completion of an approved Chain-of-Custody (COC) Form. Each party handling the samples will sign the COC and provide the date and time when the samples were relinquished or received.

The COC Form includes:

- The unique sample number as obtained from the sample label
- Date and time of sample collection
- Number of total containers per unique sample number
- Number of containers per preservative used
- Source of the sample
- Analysis name and analytical method requested (i.e., OM Metals)
- Name of person taking samples
- Signature of persons involved in the chain-of-custody
- Inclusive dates of possession

## **1.2 Groundwater Analysis Procedures**

### **1.2.1 Laboratory Procedures**

Paramount to the receipt of representative data is that the analytical laboratory closely follows an established QA/QC program. To eliminate the laboratory's interpretation of the items required in a QA/QC program, a detailed QA/QC Plan needs to be requested from the laboratory and submitted to the TCEQ Municipal Solid Waste Permits for review and approval prior to the receipt and analysis of the samples. The QA/QC Plan should include as a minimum, the following criteria:

- Technical expertise, and instrumentation capable of performing the desired analyses.

- Method Detection Limits (MDLs) and practical quantitation limits (PQLs), as appropriate.
- Possession of the required current state and/or health department certifications of competence.
- Frequency of third party chemist validation of analytical data.
- Detailed listing of typical sample holding times, sequence of sample analyses, container certifications of quality and cleanliness, frequency of laboratory and blanks, duplicates, spikes, and instrumentation calibrations.

If at any time the site changes analytical laboratories, the Laboratory Standard Operating Procedures (LSOP) should be submitted to the TCEQ for review and approval of the laboratory's QA/QC procedures. In the event that the laboratory changes over time, updated LSOPs will be submitted by the laboratory to the City. The City will then submit the LSOP to TCEQ for review and approval. All laboratory testing, laboratory QA/QC, and laboratory reporting will be conducted in accordance with 30 TAC §330, Subchapter F.

### 1.2.2 Practical Quantitation Limit

The practical quantitation limit (PQL) is defined as the lowest concentration reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions and is analogous to the limit of quantitation (LOQ) definition in the most recent available National Environmental Laboratory Accreditation Conference (NELAC) Standard. The PQL is method, instruments, and analyte specific and may be updated as more data becomes available. The PQL must be below the groundwater protection standard established for that analyte as defined by 30 TAC §330.409(h) unless approved otherwise by the TCEQ. The precision and accuracy of the PQL shall be initially determined from the PQLs reported over the course of a minimum of eight groundwater monitoring events. The results obtained from these events shall be used to demonstrate that the PQLs meet the specified precision and accuracy as shown in the table below. The PQL will be supported by analysis of a PQL check sample, which is a laboratory reagent grade sample matrix spiked with chemicals of concern at concentrations equal to or less than the PQL. At minimum, a PQL continues to meet the specified limits for precision and accuracy as defined in the table below.

**Table III5B-1: PQL Performance Objectives**

Chemical Compound	Precision (%RSD)	Accuracy (% Recovery)	EPA SW-846 Analytical Method
Metals	10	70-130	6010 (6020)
Volatiles	20	50-150	8260
Semi-Volatiles	30	50-150	8270

% RSD – is a measure of precision, calculated as the standard deviation of the set of values divided by the average and multiplied by 100.

% Recovery – is defined as a measure of agreement between analytical measurements and accepted reference values (recover % of a true value)

### **1.2.3 TCEQ Established PQLs**

The MSW Permits Section of the TCEQ has performed an Inter-Laboratory MSW Practical Quantitation Limit (PQL) Study and revised the groundwater monitoring performance objectives to better meet both 40 CFR §258.53(h)(5) and 30 TAC §330.405(f)(5) for the requirements to specify limits for precision and accuracy at the PQL. As a result of the study, MSW-PQL “benchmark” concentrations for the 40 CFR Part 258 Appendix I constituents have been established. If the City does not wish to use the MSW-PQL benchmarks, then the City will be required to demonstrate how the preferred reporting limits chosen are representative of the lower limit of quantitation that can meet the PQL performance objectives.

Appendix III5B-2A, Detection Monitoring Constituents contains the 40 CFR Part 258 Appendix I constituents, EPA SW-846 Analytical Method, and associated MSW-PQL benchmark concentrations. EPA Method 6020 may be used for metals analysis because instrumentation is capable of attaining reporting limits for all metal constituents, which are low enough to capture concentrations at or below regulatory groundwater protections standards.

The most current MSW-PQL benchmark concentrations must be used in lieu of Method Detection Limits (MDLs) as reporting limits. Only concentrations at or above the MSW-PQL shall be reported and those less than the MSW-PQL will be reported as non-detected.

## **2.0 DETECTION MONITORING PROGRAM**

30 TAC §§330.63(f)(5), 330.407(a), & 330.407(d)

The detection monitoring program provides for the sampling and analysis of groundwater at each of the groundwater monitor wells in the groundwater monitoring system to determine if there is a Statistical Significant Increase (SSI) in any hazardous constituents listed in the table located in 40 Code of Federal Regulations Part 258, Appendix I. After establishment of the background groundwater quality, the detection monitoring frequency shall be at least semiannual during the active life of the facility and the closure and post-closure care period. If the City determines that the detection monitoring program no longer satisfies the requirements of 30 TAC §330.407, the City must, within 90 days of this determination, submit an application for a permit amendment or modification to make any appropriate changes to the program.

### **2.1 Detection Monitoring Constituents**

30 TAC §330.419

The City shall sample and analyze groundwater at each of the groundwater monitor wells in the groundwater monitoring system for any hazardous constituents listed in the table located in 40 Code of Federal Regulations Part 258, Appendix I. Appendix III5B-2A, Detection Monitoring Constituents lists the 40 CFR

Part 258 Appendix I constituents. In addition, the monitoring wells may also be sampled for water quality parameters listed in Appendix III5B-2B, Water Quality Parameters.

## 2.2 Background Quality Establishment

30 TAC §§330.63(f)(5)(B), 330.405(d), & 330.407(a)(1)

Background sampling for a groundwater monitoring well within the groundwater monitoring system shall be completed on a quarterly basis until eight non-filtered statistically independent samples is collected and analyzed. Testing results will be analyzed and using a statistical method described in Section 4.0, Groundwater Monitoring Data Evaluation to establish background values, or upper prediction limits (UPLs), for each Detection Monitoring Constituent for each groundwater monitoring well within the groundwater monitoring system. Background data sets may be updated once every two years with semiannual detection monitoring results that are demonstrated to be representative of background groundwater quality. At least one sample from each groundwater monitor well shall be collected and analyzed during each subsequent semiannual sampling event.

Upon completion of background monitoring and during background updates, the background data to will be evaluated ensure that the data are representative of background groundwater constituent concentrations unaffected by waste management activities, leakage from a solid waste management unit, or other sources of contamination. The evaluation shall be documented in a report and submitted to the TCEQ before the next subsequent groundwater monitoring event following the updated background period.

## 2.3 Detections Above Established Background Quality

30 TAC §330.407(b)

Not later than 60 days after each sampling event, the City shall determine whether there has been an exceedance over background of any tested Detection Monitoring Constituents at any groundwater monitor well. An exceedance is determined to be a detection above the upper prediction limit (UPL) of the established background value for inorganic constituents; for volatile organic constituents an exceedance is determined to be a detection above the TCEQ established MSW-PQL benchmark concentrations listed in Appendix III5B-2A, Detection Monitoring Constituents.

If an exceedance is determined, the City shall notify the TCEQ of the initial exceedance, and any local pollution agency with jurisdiction that has requested to be notified, in writing within 14 days. The Notice of Initial Exceedance will include a statement explain how the City intends to proceed regarding any initial exceedances. Possible actions include:

- treating the initial exceedance as an statistically significant increase (SSI) and establishing an assessment monitoring program,

- conducting verification resampling, or
- preparing and submitting an alternate source demonstration (ASD)

### **2.3.1 Statistically Significant Increase**

30 TAC §330.407(b)(1)

If the City determines a statistically significant increase (SSI) over background of any tested constituent at any monitoring well, the City shall immediately place a notice in the site operating record (SOR) describing the increase and shall establish an assessment monitoring program meeting the requirements of 30 TAC §330.409 within 90 days of the date of the required notice to the TCEQ.

### **2.3.2 Verification Resampling**

30 TAC §330.407(b)(2)

If an exceedance is determined over background of any tested Detection Monitoring Constituents at any monitoring wells, the City may submit the results of verification resampling as appropriate for the statistical method being used within 60 days of determining the initial exceedance. The resample data may be used to statistically confirm or disprove an SSI.

### **2.3.3 Alternative Source Demonstration**

30 TAC §§330.407(b)(3), & 330.407(b)(4)

If a SSI increase over background of any tested Detection Monitoring Constituents at any groundwater monitoring well has occurred and the City has reasonable cause to believe that a source other than a landfill unit caused the contamination or that the SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality, then the City may submit a report providing documentation to this effect. In making an alternative source demonstration, the City must:

- notify the TCEQ, and any local pollution agency with jurisdiction that has requested to be notified, in writing within 14 days of determining a SSI over background at the compliance point that the City intends to make a demonstration;
- within 90 days of determining a SSI, submit a report to the TCEQ, and any local pollution agency with jurisdiction that has requested to be notified, that demonstrates that a source other than a monitored landfill unit caused the contamination or that the SSI resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The report must be prepared and certified by a qualified groundwater scientist;
- not filter the groundwater sample for constituents addressed by the demonstration prior to laboratory analysis. The TCEQ may also require City to provide analyses of the landfill leachate to support the demonstration; and
- continue to monitor in accordance with the Detection Monitoring Program.

If the City does not make a demonstration satisfactory to the TCEQ within 90 days after the date of the required notice to the TCEQ, the City shall initiate an assessment monitoring program that meets the requirements of 30 TAC §330.409. The TCEQ may require the City to install additional wells at the point of compliance to further characterize the release.

## 2.4 Annual Detection Monitoring Report

30 TAC §330.407(c)

The City shall submit an annual detection monitoring report within 90 days after the facility's last groundwater monitoring event in a calendar year that must include the following information determined since the previously submitted annual report:

- a statement regarding whether a statistically significant increase has occurred over background values in any well during the previous calendar year period and the status of any statistically significant increase events;
- the results of all groundwater monitoring, testing, and analytical work obtained or prepared under the requirements of this GWSAP, including a summary of background groundwater quality values, groundwater monitoring analyses, statistical calculations, graphs, and drawings;
- the groundwater flow rate and direction in the uppermost aquifer. The groundwater flow rate and direction of groundwater flow shall be established using the data collected during the preceding calendar year's sampling events from the monitoring wells of the detection monitoring program. The City shall also include in the report all documentation used to determine the groundwater flow rate and direction of groundwater flow;
- a contour map of piezometric water levels in the uppermost aquifer based at a minimum upon concurrent measurement in all monitoring wells. All data or documentation used to establish the contour map should be included in the report;
- recommendation for any changes; and
- any other items requested by the TCEQ.

In addition, the City will submit the entire laboratory report which includes laboratory QA/QC data and laboratory analytical data, a laboratory case narrative, and a laboratory checklist. The facility may explain any problems encountered in the laboratory analysis, either by adding additional explanations to the checklist or by extending the laboratory case narrative. Any information required in the laboratory case narrative that cannot be completed by the laboratory will be completed by the City.

## 3.0 ASSESSMENT MONITORING PROGRAM

30 TAC §§330.63(f)(6), 330.409(a), & 330.409 (g)(4)

An assessment monitoring program will be initiated within 90 days whenever the City determines there has been a SSI over background for one or more of the Detection Monitoring Constituents or the TCEQ does not accept an alternate source demonstration (ASD) for the SSI. The assessment monitoring program

provides for the sampling and analysis of groundwater at each of the groundwater monitor wells in the groundwater monitoring system to determine if there is a Statistical Significant Level (SSL) above the groundwater protection standard (GWPS) of any hazardous constituents listed in the table located in 40 Code of Federal Regulations Part 258, Appendix II.

If the presence of hazardous constituents listed in 30 TAC §330.419 has been detected in the groundwater at the time of the permit application, the City shall submit sufficient information, supporting data, and analyses to establish an assessment monitoring program that meets the requirements of 30 TAC §330.409. If the City determines that the assessment monitoring program no longer satisfies the requirements of 30 TAC §330.409 relating to Assessment Monitoring Program, the City must, within 90 days, submit an application for a permit amendment or modification to make any appropriate changes to the program.

### **3.1 Assessment Monitoring Constituents**

30 TAC §§330.63(f)(6)(C) & 330.409(b)

At the initiation of the assessment monitoring program, the City shall sample and analyze the groundwater monitoring system for the full set of constituents listed in in the table located in 40 Code of Federal Regulations Part 258, Appendix II. The Appendix II constituents are inclusive of the Detection Monitoring Constituents. Appendix III5B-2C, Assessment Monitoring Constituents lists the 40 CFR Part 258 Appendix II constituents.

### **3.2 Assessment Sampling**

30 TAC §§330.409(b), 330.409 (c)(1)-(5), 330.409 (d), & 330.409 (d)(1)

A minimum of one sample shall be collected from each groundwater monitor well and analyzed for the Assessment Monitoring Constituents. Not later than 60 days after the initial assessment sampling event, the City shall submit to the TCEQ the Assessment Monitoring Constituents results from the initial sampling event and place them in the site operating record.

After sampling all groundwater monitor wells for Assessment Monitoring Constituents, the TCEQ may specify an appropriate subset of wells to be sampled and analyzed for the Assessment Monitoring Constituents during assessment monitoring and may delete any of the Assessment Monitoring Constituents for a municipal solid waste management unit if the City can document that the removed constituents are not reasonably expected to be in or derived from the waste contained in the unit.

The TCEQ may specify an alternative monitoring frequency for repeated sampling and analysis during the active life and the closure and post-closure care period for the Assessment Monitoring Constituents. The alternative frequency during the active life and the closure and post-closure care period shall be not less than annual. The alternative frequency shall be based on consideration of the following factors:

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Submitted: July 2017  
Revised: November 2017

- lithology and hydraulic conductivity of the aquifer and unsaturated zone;
- groundwater flow rates;
- minimum distance of travel from the waste nearest to any groundwater monitoring well;
- resource value of the uppermost aquifer; and
- nature (fate and transport) of any constituents detected.

Within 90 days of submittal of the results from the initial assessment sampling event and on at least a semiannual basis thereafter, resample all groundwater monitor wells in the groundwater monitoring system or TCEQ approved subset of wells and conduct analyses for all Detection Monitoring Constituents and for those additional Assessment Monitoring Constituents that are detected. Not later than 60 days after each sampling event, the City shall submit to the TCEQ the Assessment Monitoring Constituents results from the initial and subsequent sampling events and place them in the site operating record.

### 3.3 Background Quality Establishment

30 TAC §§330.409(b) & 330.409(d)(2)

For any new constituent(s) detected in the groundwater monitor wells as a result of the complete Assessment Monitoring Constituents analysis, a minimum of four statistically independent samples from each groundwater monitor well shall be collected and analyzed to establish background levels for the additional constituent(s).

### 3.4 Duration of Assessment Monitoring

30 TAC §§330.409(e) & 330.409(f)

If the concentrations of the Assessment Monitoring Constituents are shown to be at or below background values, using the statistical procedures in 30 TAC §330.405(f) for two consecutive sampling events, the City must notify the TCEQ in writing and return to detection monitoring if approved. If the concentrations of the Assessment Monitoring Constituents are above background values, but below the established groundwater protection standard City shall continue assessment monitoring.

### 3.5 Groundwater Protection Standards

30 TAC §§330.409(d)(3), 330.409(h), & 330.409(i)

The City shall establish a GWPS for Assessment Monitoring Constituents detected in the groundwater monitor wells. The groundwater protection standard must be:

- for constituents for which a maximum contaminant level (MCL) has been promulgated under 40 CFR Part 141, Safe Drinking Water Act (codified), §1412, the MCL for that constituent;

- for constituents for which MCLs have not been promulgated, the background concentration for the constituent established from wells; or
- for constituents for which the background level is higher than the MCL, the background concentration.

The TCEQ may establish an alternative GWPS for Assessment Monitoring Constituents for which MCLs have not been established. These GWPS shall be appropriate health-based levels that satisfy either the criteria of the following:

- the level is derived in a manner consistent with United States Environmental Protection Agency guidelines for assessing the health risks of environmental pollutants (51 FR 33992, 34006, 34014, 34028, September 24, 1986);
- the level is based on scientifically valid studies conducted in accordance with the Toxic Substances Control Act Good Laboratory Practice Standards (40 CFR Part 792) or equivalent;
- for carcinogens, the level represents a concentration associated with an excess lifetime cancer risk level (due to continuous lifetime exposure) with the  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$  range; and
- for systemic toxicants, the level represents a concentration to which the human population (including sensitive subgroups) could be exposed to on a daily basis that is likely to be without appreciable risk of deleterious effects during a lifetime. For purposes of this subchapter, systemic toxicants include toxic chemicals that cause effects other than cancer or mutation; or

inclusive or comply with the level is developed in accordance with 30 TAC §350, Texas Risk Reduction Program.

### 3.6 Detections above Groundwater Protection Standards

30 TAC §330.409(g)

Not later than 60 days after each sampling event, the City shall determine whether any Assessment Monitoring Constituents were detected at statistically significant levels (SSLs) above the established groundwater protection standard (GWPS) in any sampling event. A SSL is when the calculated 95% lower confidence limit (LCL) from the eight previous sampling events exceeds the GWPS. If a SSL has been determined, the City shall notify the TCEQ and appropriate local government officials in writing within seven days.

#### 3.6.1 Requirements

30 TAC §330.409(g)(1)

If the groundwater protection standard has been exceeded, the City shall also:

- characterize the nature and extent of the release by installing additional monitoring wells as necessary;

- install at least one additional monitoring well between the monitoring well with the statistically significant level and the next adjacent wells along the point of compliance before the next sampling event and sample these wells;
- notify in writing all persons that own or occupy the land that directly overlies any part of the plume of contamination if contaminants have migrated off-site as indicated by sampling of wells; and
- initiate Assessment of Corrective Measures Program all within 90 days of the notice to the TCEQ.

### 3.6.2 *Alternate Source Demonstration*

30 TAC §330.409(g)(2)-(3)

The City may demonstrate that a source other than the monitored solid waste management unit caused the contamination or that the SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. In making an alternative source demonstration (ASD), the City must:

- notify the TCEQ in writing within 14 days of determining a SSL above the GWPS at the point of compliance that the City intends to make an ASD;
- within 90 days of determining a SSL above the GWPS, submit a report to the TCEQ that demonstrates that a source other than the monitored solid waste management unit caused the contamination or that the SSL resulted from error in sampling, analysis, statistical evaluation, or natural variation in groundwater quality. The report shall be prepared and certified by a qualified groundwater scientist;
- not filter the groundwater samples for constituents addressed by the demonstration prior to laboratory analysis. The TCEQ may also require the City to provide analysis of landfill leachate to support the demonstration; and
- continue to monitor in accordance with the Assessment Monitoring Program.

If a successful ASD is made, the City shall continue monitoring in accordance with the Assessment Monitoring Program and may return to detection monitoring after two consecutive sampling events if the Assessment Monitoring Constituents are at or below established background concentrations. Until a successful demonstration is made, the City shall comply with the requirements of this section including initiating an assessment of corrective measures.

### 3.7 *Assessment of Corrective Measures*

30 TAC §330.63(f)(7)

If hazardous constituents have been measured in the groundwater that exceed the concentration limits of the established GWPS, the City shall submit sufficient information, supporting data, and analyses to establish a corrective action program that meets the requirements of 30 TAC §330.411 and §330.413 relating to Assessment of Corrective Measures and Selection of Remedy, respectively. To demonstrate compliance with of 30 TAC §330.411, the City shall address, at a minimum, the following:

- a characterization of the contaminated groundwater, including concentrations of assessment constituents as defined in §330.409 of this title;
- the concentration limit for each constituent found in the groundwater;
- detailed plans and an engineering report describing the corrective action to be taken;
- a description of how the groundwater monitoring program will demonstrate the adequacy of the corrective action; and
- a schedule for submittal of the aforementioned information required provided the City obtains written authorization from the TCEQ prior to submittal of the complete permit application.

Implementation of the Corrective Action Program will be conducted in accordance with 30 TAC § 330.415.

### **3.8 Annual Assessment Monitoring Report**

30 TAC §§330.63(f)(6)(A), 330.409(k), & 330.409(k)(1)-(6)

The City shall submit an annual assessment monitoring report within 60 days after the facility's second semiannual groundwater monitoring event that includes the following information determined since the previously submitted report:

- a statement whether an statistically significant level above the established groundwater protection standard has occurred in any groundwater monitor well during the previous calendar year period and the status of any statistically significant level events;
- the results of all groundwater monitoring, testing, and analytical work obtained or prepared in accordance with the requirements of this GWSAP, including a summary of background groundwater quality values, groundwater monitoring analyses, statistical calculations, graphs, and drawings;
- the groundwater flow rate and direction in the uppermost aquifer. The groundwater flow rate and direction of groundwater flow shall be established using the data collected during the preceding calendar year's sampling events from the monitoring wells of the Assessment Monitoring Program. The City shall also include in the report all documentation used to determine the groundwater flow rate and direction of groundwater flow;
- a contour map of piezometric water levels in the uppermost aquifer based, at a minimum, upon concurrent measurement in all groundwater monitor wells. All data or documentation used to establish the contour map should be included in the report;
- recommendation for any changes; and
- any other items requested by the TCEQ such as a description of any special wastes previously handled at the facility.

In addition, the City will submit a laboratory case narrative and a laboratory checklist with all analysis submitted to the TCEQ. An example laboratory review checklist and exception report is included in Appendix D. In place of the laboratory checklist, the facility may submit a copy of the laboratory QA/QC and analytical data. The facility may explain any problems encountered in the laboratory analysis, either by adding additional explanations to the checklist or by extending the laboratory case narrative. Any

information required in the laboratory case narrative that cannot be completed by the laboratory will be completed by the City.

## 4.0 GROUNDWATER MONITORING DATA EVALUATION

30 TAC §§330.63(f)(5)(C) & 330.63(f)(6)(E)

Provided in the following sections are a description of statistical comparison procedures that may be utilized in evaluating groundwater monitoring data in accordance with 30 TAC §330.405 (e) – (f).

### 4.1 Statistical Methods

30 TAC §330.405(e)

One or more of the following statistical methods may be used in evaluating groundwater monitoring data for each parameter or constituent analyzed as required for the Detection Monitoring Program and Assessment Monitoring Program under 30 TAC §330.407 and §330.409 respectively. These statistical analysis methods are necessary to determine whether a statistically significant increase (SSI) over background has occurred. The statistical analysis of monitoring data occurs after receiving validated results from each sampling and analysis event. The statistical test(s) chosen shall be conducted separately for each tested constituent in each groundwater monitoring well or sampling point.

Different methods may be selected for each groundwater quality constituent. The appropriateness of a method must be substantiated by demonstrating that the distribution of the data for that constituent is appropriate for the method. Selection of a specific method is described in the USEPA "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities - Interim Final Guidance" (USEPA, 1989) and is also discussed in "Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities - Addendum to Interim Final Guidance" (USEPA, 1992). The methods include the following:

- a parametric analysis of variance followed by multiple-comparisons procedures to identify statistically significant evidence of contamination. The method shall include estimation and testing of the contrasts between each point of compliance well's mean and the background mean levels for each constituent;
- an analysis of variance based on ranks followed by multiple-comparisons procedures to identify statistically significant evidence of contamination. The method shall include estimation and testing of the contrasts between each point of compliance well's median and the background median levels for each constituent;
- a tolerance or prediction interval procedure in which an interval for each constituent is established from the distribution of the background data and the level of each constituent in each point of compliance well is compared to the upper tolerance or prediction limit;
- a control-chart approach that gives control limits for each constituent; and
- another statistical test method that meets the performance standards. The City shall submit to the TCEQ satisfactory justification for this alternative test. Sanitas™ statistical software may be used to determine intrawell statistical "upper prediction limits".

## 4.2 Performance Standards

30 TAC §330.405(f)

The statistical performance standards provide a means to limit the possibility of making false conclusions from the monitoring data. Any statistical method chosen shall comply with the following performance standards, as appropriate. The statistical method used to evaluate groundwater monitoring data shall be appropriate for the distribution of tested constituents. If the distribution of a tested constituent is shown by the City to be inappropriate for a normal theory test, then the data should be transformed or a distribution-free theory test should be used. If the distributions for the constituents differ, more than one statistical method may be needed. Any statistical method chosen shall comply with the following performance standards, as appropriate:

- The statistical method used to evaluate groundwater monitoring data shall be appropriate for the distribution of tested constituents. If the distribution of a tested constituent is shown by the owner or operator to be inappropriate for a normal theory test, then the data should be transformed or a distribution-free theory test should be used. If the distributions for the constituents differ, more than one statistical method may be needed.
- If an individual well (or sampling point) comparison procedure is used to compare an individual compliance well constituent concentration with background constituent concentrations or a groundwater protection standard, the test shall be done at a Type I error level no less than 0.01 for each testing period. If a multiple-comparisons procedure is used, each testing period shall be no less than 0.05, but the Type I error of no less than 0.01 for individual well comparisons shall be maintained. This performance standard does not apply to tolerance intervals, prediction interval, or control charts.
- If a control-chart approach is used to evaluate groundwater monitoring data, the specific type of control chart and its associated parameter values shall be protective of human health and the environment. These parameters shall be determined after considering the number of samples in the background database, the data distribution, and the range of the concentration values for each constituent of concern.
- If a tolerance interval or a prediction interval is used to evaluate groundwater monitoring data, the levels of confidence, and for tolerance intervals the percentage of the population that the interval must contain, shall be protective of human health and the environment. These parameters shall be determined after considering the number of samples in the background data base, the data distribution, and the range of the concentration values for each constituent of concern.
- The statistical method shall account for data below the limit of detection with one or more statistical procedures that are protective of human health and the environment. Any practical quantitation limit that is used in the statistical method shall be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility.
- If necessary, the statistical method shall include procedures to control or correct for seasonal and spatial variability as well as temporal correlation in the data.

### 4.3 Data Presentation

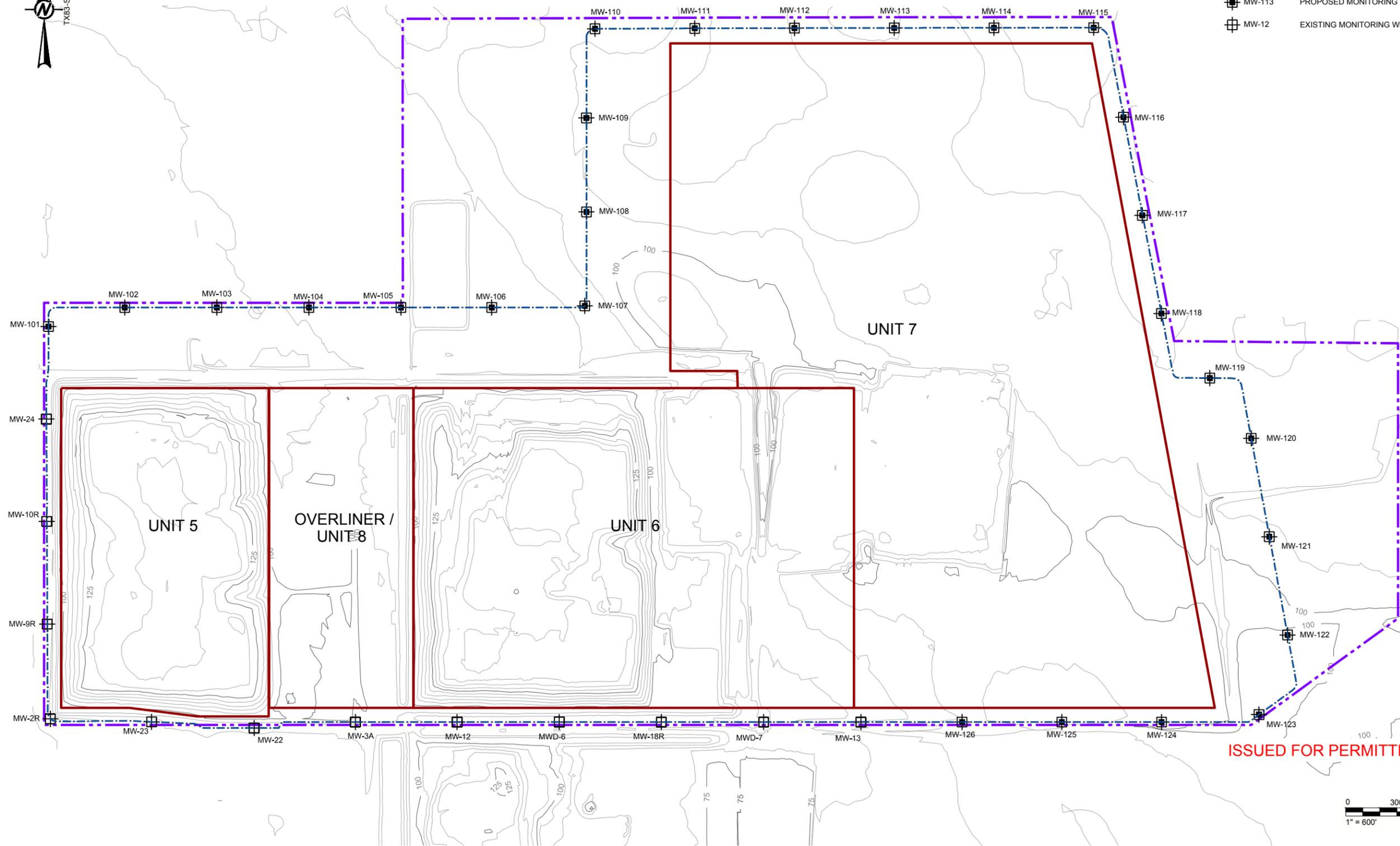
Upon receiving the groundwater sampling data from the laboratory, it shall be organized in a format that it can be clearly understood and analyzed. For each sampling event, the City will make a selection of at least one or more of the following data presentation formats:

- **Tables:** provide an overall summary of the data in a neat, clearly understood format that allows straightforward analysis and comparison to other data points and standards;
- **Contour Maps:** placement of contaminant concentrations in contours on a map assist in conveying a clearer picture of contamination distribution. Contaminant distribution and associated concentrations will dictate whether this format can be easily utilized;
- **Time Series Displays (X and Y Line Graphs):** assist in the display of single or multiple contaminant concentration variations over time for a single data point or for multiple point comparison; and/or
- **Histograms (X and Y Bar Graphs):** allows comparisons of the magnitudes of single or multiple data point contaminant concentrations.

The groundwater sampling and laboratory analytical results will be submitted to the TCEQ on forms and electronic formats specified by the TCEQ.



- LEGEND**
- - - PERMIT BOUNDARY
  - · - · - POINT OF COMPLIANCE
  - - - UNIT BOUNDARY / LIMITS OF WASTE PLACEMENT
  - MW-113 PROPOSED MONITORING WELL
  - MW-12 EXISTING MONITORING WELL



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CEI	CEI
REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED

SEAL

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821 6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**GROUNDWATER MONITORING SYSTEM PLAN**

PROJECT NO. 1401491	APPLICATION SECTION III5B	REV. 1	1 of 1	FIGURE III5B-1
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 6

# LANDFILL GAS MANAGEMENT PLAN

EDINBURG REGIONAL DISPOSAL FACILITY

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

**INTENDED FOR PERMITTING  
PURPOSES ONLY**

July 2017  
Revised: November 2017

Project No. 1401491



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## EXECUTIVE SUMMARY

30 TAC §§330.63(g), 330.371(a)(1), 330.371(a)(2), 330.371(e) & 330.371(f)

In accordance with 30 TAC §330.63(g) and all of the requirements 30 TAC §330, Subchapter I, a Landfill Gas Management Plan (LFGMP) has been developed for the facility to provide a site-specific approach for implementing landfill gas (LFG) monitoring and control. LFG, containing approximately equal amounts of flammable methane and non-flammable carbon dioxide and various other trace gases, is produced by microorganisms biologically decomposing organic waste. The purpose of LFGMP is to provide the methodology whereby LFG will be managed to ensure the concentration of methane gas generated by the facility does not exceed 1.25 percent by volume (25 percent of the lower explosive limit (LEL)) in facility structures (excluding gas control or recovery system components) and the concentration of methane gas does not exceed 5 percent by volume (100 percent of the LEL) in monitoring points, probes, subsurface soils, or other matrices at the facility boundary.

The City of Edinburg (City) shall continue the gas monitoring and control program for a period of 30 years after certification of final closure of the facility or until the owner or operator receives written authorization to reduce the program. Authorization to reduce gas monitoring and control shall be based on a demonstration by the City that there is no potential for gas migration beyond the property boundary or into on-site structures. Demonstration of a proposal to reduce gas monitoring and control shall be supported by data collected and additional studies as required.

Gas monitoring and control systems shall be revised as needed to maintain current and effective gas monitoring and control systems. Post-closure land use at the site shall not interfere with the function of gas monitoring and control systems. Any underground utility trenches that cross the landfill facility boundary shall be vented and monitored regularly.

In addition to this LFGMP developed to address all of the requirement in 30 TAC §330 Subchapter I, the City must also comply with other applicable federal and state air quality regulations.

- 40 CFR Part 60, Subpart WWW
- 40 CFR Part 60, Subpart XXX
- 40 CFR Part 63, Subpart A, 63.6(e)(3)
- 30 TAC §330 Subchapter U

## **1.0 GENERAL SITE INFORMATION**

The type and frequency of routine methane monitoring of the facility implemented is determined based on the following conditions and layout.

### **1.1 Site Conditions**

30 TAC §330.371(b)(1)(A)-(C)

A more detailed discussion of soil, hydrogeologic, and hydraulic conditions surrounding the facility is presented in Part III4, Geology Report.

#### **1.1.1 Soil Conditions**

The soils within vicinity of the facility are predominantly sandy loam and have similar soil properties. They are well drained because of high infiltration rates and lack natural drainage features.

#### **1.1.2 Hydrogeologic Conditions**

Groundwater occurs primarily within the upper water bearing unit at the site which is composed of sands/silty sands; separated from lower aquifers by underlying clay, which acts as an aquiclude.

#### **1.1.3 Hydraulic Conditions**

Groundwater within the currently permitted area of TCEQ Permit MSW-956B has a very low hydraulic gradient with variable flow directions with an estimated groundwater flow rate of 7.4 feet per year. In the expansion area to be included in TCEQ Permit MSW-956C, groundwater flow is predominantly towards the east, northeast, or southeast in subdued conformance to topography with an estimate groundwater flow rate of 2.0 feet per year.

### **1.2 Facility Layout**

30 TAC §§330.371(b)(1)(D) & 330.371(b)(1)(E)

A more detailed discussion of the facility layout is presented in Part II, Waste Acceptance Plan, Existing Conditions Summary, and Facility Layout.

#### **1.2.1 Facility Structures**

No enclosed on-site facility structures are located within the facility's property boundary that have a potential for LFG migration to accumulate – the closest enclosed structure to the facility is a maintenance building located approximately 1,050 ft south of the permit boundary. For the purpose of this LFGMP, methane monitoring for enclosed facility structures with potential for LFG migration to accumulate is discussed.

## 1.2.2 Utility Lines and Pipelines

### 1.2.2.1 Utility Lines

Two underground utility lines cross the facility's property boundary. One City owned sanitary sewer line crosses the west property boundary along Encinitos Road and another crosses the south property boundary adjacent to the entrance road into the facility.

### 1.2.2.2 Pipelines

Four pipelines either cross or run along the facility's boundary. One gas pipeline easement granted to Texas Gas Service, a division of One Gas, Inc. for future pipeline construction crosses the east property boundary and midway along the north property boundary. Another gas production pipeline easement granted to Vernon E. Faulconer, Inc. for future construction crosses the midway along the north property boundary adjacent to the aforementioned pipeline. A landfill gas pipeline from the Landfill Gas Treatment Facility TCEQ Permit MSW-48038 crosses the facility's western property boundary north of Encinitos Road. In addition, an existing interstate gas pipeline owned by Texas Gas Service, a division of One Gas, Inc., without a dedicated easement, is centered along the southern facility boundary.

## 2.0 LANDFILL GAS MONITORING PLAN

The objectives of this plan are to provide a site-specific approach for monitoring for the presence of landfill gas along the facility property boundary and to monitor the potential for gas accumulation within on-site enclosed structures.

### 2.1 Permanent Monitoring Network

30 TAC §§330.371(h)(1) & 330.371(h)(2)

The facility has demonstrated a presence of methane gas above a concentration of 0.5 percent by volume and requires a permanent monitoring system. The permanent monitoring network includes monitoring probes, utility trench gas vents, and any enclosed on-site structures where potential gas buildup would be of concern as depicted on Figure III6-1, Permanent Landfill Gas Monitoring Network.

#### 2.1.1 Monitoring Probes

An expansion of the network of permanently installed gas monitoring probes (GP's) to detect potential LFG migration is concurrent with landfill development at discussed in Part II, Waste Acceptance Plan, Existing Conditions Summary, and Facility Layout. The current monitoring probe network is comprised of 27 monitoring probes. As the facility develops, 12 will be abandoned and 26 additional will be installed totaling 41 monitoring probes with a spacing no greater than 600 feet.

Gas monitoring probes are located along the facility boundary with an exception of GP-105 through GP-109 and GP-119 through GP-122 where they are located within 500 feet from the waste footprint along the

point of compliance for the groundwater monitoring wells as described in Part III5, Groundwater Characterization and Monitoring Report for accessibility. The installation of gas monitoring probes GP-39 through GP-43 are pending based on future construction of Cells 5B, 6B, 7A, and 7B. If these gas monitoring probes GP-39 through GP-43 are installed prior to approval of this application, they will be abandoned with existing gas monitoring probes installed directly north of Units 1–6. Existing gas monitoring probes west of Unit 5 and south of Units 1–6 are to remain or may be relocated to accommodate drainage improvements provided in Part III2, Surface Water Drainage Report where the distance between gas monitoring probes is no greater than 600 feet.

Gas monitoring probes to be installed must be a screened to a depth equal to the seasonal low groundwater table or the maximum depth of waste as measured within 1,000 feet of the monitoring point, whichever is shallower. The seasonal low groundwater table is at a lower elevation than the maximum bottom of waste as demonstrated on Figure III6-1, Permanent Landfill Gas Monitoring Network, therefore gas monitoring probes to be installed shall have a screen depth elevation equal to the seasonal low groundwater table.

**Table III6-1: Permanent Landfill Gas Monitoring Probes**

Gas Probe ID	Site Grid Northing <sup>1</sup>	Site Grid Easting <sup>1</sup>	Seasonal Low Groundwater Elevation <sup>2</sup> (ft-msl)	Comments
GP-24	18	2,094	67.1	Existing to Remain
GP-25R	17	1,177	66.2	Existing to Remain
GP-26	21	93	65.5	Existing to Remain
GP-27R	362	11	65.7	Existing to Remain
GP-28	768	17	66.0	Existing to Remain
GP-29	1,158	15	66.4	Existing to Remain
GP-30	1,601	14	66.5	Existing to Remain
GP-31	1,952	13	68.0	Existing to Remain
GP-34	18	643	65.8	Existing to Remain
GP-35	18	1,688	67.1	Existing to Remain
GP-44	18	4,861	68.8	Existing to Remain
GP-45	18	4,232	69.7	Existing to Remain
GP-46	18	3,688	67.8	Existing to Remain
GP-47	18	3,147	67.4	Existing to Remain
GP-48	18	2,611	67.0	Existing to Remain
GP-101	2,443	203	71.2	Proposed to be Installed
GP-102	2,443	743	69.8	Proposed to be Installed
GP-103	2,443	1,283	69.1	Proposed to be Installed
GP-104	2,443	1,823	69.0	Proposed to be Installed
GP-105	2,443	2,363	68.6	Proposed to be Installed
GP-106	2,443	2,895	68.3	Proposed to be Installed
GP-107	2,727	3,180	68.4	Proposed to be Installed

Gas Probe ID	Site Grid Northing <sup>1</sup>	Site Grid Easting <sup>1</sup>	Seasonal Low Groundwater Elevation <sup>2</sup> (ft-msl)	Comments
GP-108	3,272	3,180	68.4	Proposed to be Installed
GP-109	3,824	3,180	68.1	Proposed to be Installed
GP-110	4,076	3,524	67.7	Proposed to be Installed
GP-111	4,076	4,105	67.4	Proposed to be Installed
GP-112	4,078	4,694	66.7	Proposed to be Installed
GP-113	4,079	5,279	63.9	Proposed to be Installed
GP-114	4,080	5,864	61.0	Proposed to be Installed
GP-115	3,800	6,284	59.6	Proposed to be Installed
GP-116	3,302	6,379	60.3	Proposed to be Installed
GP-117	2,695	6,497	61.2	Proposed to be Installed
GP-118	2,130	6,607	62.6	Proposed to be Installed
GP-119	1,955	7,028	61.2	Proposed to be Installed
GP-120	1,396	7,132	63.7	Proposed to be Installed
GP-121	814	7,239	66.4	Proposed to be Installed
GP-122	224	7,350	67.9	Proposed to be Installed
GP-123	18	6,841	68.7	Proposed to be Installed
GP-124	18	6,261	68.4	Proposed to be Installed
GP-125	18	5,676	68.2	Proposed to be Installed
GP-126	18	5,091	68.6	Proposed to be Installed
GP-32	2050	486	67.7	Existing to be Abandoned
GP-33	2050	882	67.6	Existing to be Abandoned
GP-18	2048	1408	67.3	Existing to be Abandoned
GP-19R	2038	2045	66.5	Existing to be Abandoned
GP-36	2059	2612	66.1	Existing to be Abandoned
GP-37	2057	3153	67.4	Existing to be Abandoned
GP-38	2057	3692	67.8	Existing to be Abandoned

Notes:

1. Locations provided are approximate.
2. Seasonal low groundwater elevations determined from groundwater level data collected in Part III4E, Historical Groundwater Elevations.

### 2.1.1.1 Monitoring Probe Installation

Borings for monitoring probes will be performed by drillers registered in the State of Texas, drilled with a hollow-stem auger and sampled with a split-tube sampler, logged, and supervised by either a qualified professional geologist or a registered professional engineer.

These monitoring probes, fabricated of 1- to 2-inch diameter polyvinyl chloride (PVC) material, will be constructed with a solid riser pipe that extends from approximately 3 feet above ground level to approximately 5 feet below ground level and a screened section extending to the final depth. The annular space will be filled with sand or pea gravel approximately 6 inches above the screened section, topped with

approximately 6 inches of clean backfill and an 18- to 24-inch bentonite seal, and completed with a continuous cement seal extending from a minimum 12 inches below the ground surface to form a nominal 6-inch thick, 4-ft-by-4-ft concrete apron at the surface. The probes will be protected as necessary with bollards.

A typical gas monitoring probe detail is provided in Figure III6-2, Typical Gas Monitoring Probe and Utility Trench Gas Vent Details. The specifications depicted are typical and adjustments may be necessary at the time of installation based on an evaluation of actual field conditions. Construction summaries of installed gas monitoring probes will be placed into the site operating record.

### 2.1.1.2 Monitoring Probe Inspection and Maintenance

The condition of the monitoring probes will be inspected and noted during monitoring periods. If any damage is discovered, the monitoring probe shall be promptly repaired. Barhole sampling may be used to supplement monitoring probe data as a backup plan for a damaged monitoring probe. Any monitoring probes that are irreparable or need relocation shall be decommissioned and replaced at a location where the distance between gas monitoring probes is less than 600 feet or as close to the original location as possible.

### **2.1.2 Utility Trench Gas Vents**

30 TAC §330.371(i)

Utility trench gas vents will be installed along the facility's property boundary where two sanitary sewer lines, two gas pipeline easements, and two existing gas pipelines cross.

Two underground utility lines cross the facility's property boundary. One City owned sanitary sewer line crosses the west property boundary along Encinitos Road and another crosses the south property boundary adjacent to the entrance road into the facility. Utility trench gas vents will be installed where they cross the facility boundary for monitoring designated as GV-1 and GV-2 respectively.

One gas pipeline easement granted to Texas Gas Service, a division of One Gas, Inc. for future pipeline construction crosses the east property boundary, GV-4, and midway along the north property boundary, GV-3. A gas production pipeline easement granted to Vernon E. Faulconer, Inc. for future construction crosses the eastern limit of the north property boundary, GV-5, adjacent to the aforementioned pipeline. A landfill gas pipeline from the Landfill Gas Treatment Facility TCEQ Permit MSW-48038 crosses the facility's western property boundary north of Encinitos Road, GV-6, and the facility's southern property boundary north of the LFGTF, GV-7. In addition, an existing interstate gas pipeline owned by Texas Gas Service, a division of One Gas, Inc., without a dedicated easement, is centered along the southern facility boundary.

Although this pipeline does not cross the facility boundary, utility trench gas vents will be installed at the west and east corners of southern facility boundary for monitoring, GV-8 and GV-9, respectively.

### **2.1.3 Enclosed Facility Structures**

30 TAC §330.371(i)

No enclosed on-site facility structures are located within the facility's property boundary that have a potential for LFG migration to accumulate – the closest enclosed structure to the facility is a maintenance building located approximately 1,050 ft south of the permit boundary. Any existing on-site mobile structures are elevated above the existing ground and adequately vented below; therefore, eliminating the potential for LFG migration to accumulate.

## **2.2 Monitoring Frequency**

30 TAC §§330.371(b)(2), 330.371(d), 330.371(j), 330.371(k)(1) & 330.371(k)(2)

The minimum frequency of methane monitoring shall be quarterly for the operating life of the landfill and the post-closure care period, unless directed otherwise by the executive director of the Texas Commission on Environmental Quality (TCEQ). All monitoring probes and any on-site enclosed structures shall be sampled for methane during the monitoring period. Sampling for specified trace gases may be required by the TCEQ when there is a possibility of acute or chronic exposure due to carcinogenic or toxic compounds. The TCEQ may require more frequent monitoring upon notification and may establish alternative schedules for demonstrating compliance with 30 TAC §330.371(b). The City of Edinburg (City) shall monitor more frequently those locations where monitoring results indicate that landfill gas migration is occurring or is accumulating in structures.

## **2.3 Sampling Methods**

### **2.3.1 Monitoring Probes and Utility Trench Gas Vents**

Methane monitoring during landfill operations will be performed using portable equipment. A hand-held Landtec GA-90 Infra-Red Gas Analyzer, a Landtec Gem 2000, or a similar instrument, which is capable of measuring methane gas concentrations in an oxygen deficient environment, may be used to measure methane gas concentrations at the site. Prior to sampling, calibration of the methane monitoring equipment will be verified using standard calibration gas. The type of gas monitoring equipment utilized at the facility will vary over the operational life and post-closure periods; therefore, manufacturers' specifications are not included with this plan. Monitoring data collected will be recorded on the typical form provided in Appendix III6A, Example Gas Monitoring Data Form.

### **2.3.2 Enclosed Facility Structures**

As discussed in §2.1.3, there are no enclosed on-site facility structures located within the facility's property boundary. However if any enclosed facility structures are constructed having a potential for LFG migration to accumulate; they will be monitored with either a portable equipment or a stationary continuous combustible gas monitor, which activates an audible alarm when preset combustible gas concentrations are exceeded. If the alarms are used, they will be calibrated to detect methane concentrations below 1.25 percent by volume and will be maintained and tested in accordance with the manufacturer's recommendations.

## **2.4 Contingency Plan**

30 TAC §330.371(c)-(1)

If confirmed methane gas detection levels exceeding 1.25 percent by volume in facility structures (excluding gas control or recovery system components); and/or 5 percent by volume in monitoring points, probes, subsurface soils, or other matrices at the facility boundary; the City shall immediately take all necessary steps to ensure protection of human health and notify the TCEQ, local and county officials, emergency officials, and the public.

### **2.4.1 Action for Enclosed Facility Structures**

If methane gas levels exceeding 1.25 percent by volume has been detected in enclosed facility structures (excluding gas control or recovery system components), the structure will be immediately evacuated and the Site Manager (SM), or other appropriate personnel, will be notified. Personnel (except for monitoring personnel) will not be allowed to re-enter the affected enclosed structure until a determination of the structure's safety is completed.

### **2.4.2 Action for Perimeter Monitoring at the Facility Boundary**

If methane gas levels exceeding 5 percent by volume has been detected at the perimeter points, probes, subsurface soils, or other matrices at the facility boundary as defined in §3.1.1, Monitoring Probes of this LFGMP, the SM, or other appropriate personnel, will be notified immediately. The immediate emergency response measure will be for the SM, or other appropriate personnel, to determine if nearby enclosed structures are at risk and if evacuation of the enclosed structures is necessary.

### **2.4.3 Notification Procedures**

Upon detection of methane gas exceedance, the executive director of the TCEQ, the TCEQ Region 15 office, local and county officials, emergency officials, and the public shall be notified by phone call, voicemail, email, or facsimile.

- Executive Director, MC124  
Municipal Solid Waste Permits Section  
Waste Permits Division  
Texas Commission on Environmental Quality  
PO Box 13087  
Austin, TX 78711-3087  
512-239-1000 (Phone)
- Regional Director  
Texas Commission on Environmental Quality, Region 15  
1804 W Jefferson Ave  
Harlingen, TX 78550-5247  
956-425-6010 (Phone)  
956-412-5059 (Fax)
- Director, Department of Public Works  
City of Edinburg  
415 University Drive  
Edinburg, TX 78541  
956-388-8210 (Phone)  
956-383-7111 (Fax)
- Fire Chief  
City of Edinburg  
212 W. McIntyre St.  
Edinburg, TX 78541  
(956) 383-7691 (Phone)  
(956) 289-1853 (Fax)
- Hidalgo County Emergency Management Coordinator  
100 E. Cano St., 2<sup>nd</sup> floor  
Edinburg, TX 78539  
(956) 318-2615  
(956) 289-7889

In addition to the above notifications, property owners within 1,000 feet of the methane gas exceedance and the public will be notified. Such notification should include both verbal and follow up written communication. The notice should inform them about the developing situation at the facility, including which monitoring points are involved and the actions being taken. Records of those contacts must be maintained in the facility's site operating record as required by 30 TAC §330.125.

#### **2.4.4 Source of Methane Gas Detection Evaluation**

The City shall determine the source of confirmed methane gas detection levels by considering monitoring data collected from adjacent monitoring points within the permanent monitoring network as defined in §3.1, Permanent Monitoring Network of this LFGMP. To supplement monitoring data, barhole sampling may be used to delineate the extent of methane gas releases and identify its source. Possible sources include LFG migration, gas pipelines as described in §2.2.2, Utility Line and Pipelines of this LFGMP, or from decomposition of organic materials outside the facility's waste disposal units.

### **2.4.5 Recording**

30 TAC §330.371(c)(2)

Within seven days of detection, the City will place in the site operating record the concentration of methane gas levels detected and a description of the steps taken to protect human health. If the source of methane gas detection is determined to be other than LFG migration, the City shall submit to the TCEQ a detailed evaluation identifying the source and corrective measures.

### **2.4.6 Landfill Gas Remediation Plan**

30 TAC §330.371(c)(3) & §330.371(d)

If the source of methane gas releases determined to be LFG migration, the City shall implement Appendix III6B, Landfill Gas Remediation Plan (LFGRP) within 60 days of detection, place a copy of the plan in the site operating record, provide a copy to the TCEQ, and notify the TCEQ that the plan has been implemented. The notification shall describe the nature and extent of the problem and the proposed remedy. After review, the executive director may require additional remedial measures and may establish alternative schedules for demonstrating compliance with 30 TAC §330.371(c).

If modifications to the LFGRP are required for effective remediation, a revised LFGRP shall be submitted to the TCEQ as a permit modification pursuant to 30 TAC §305.70. The modification may propose a variety of changes to the site operations, and depending on the nature of the remedial action, different provisions of the §305.70 modification rule may apply. The City shall implement the modified LFGRP for methane gas releases within 60 days of detection and should not wait until the permit modification is issued.

## **3.0 LANDFILL GAS MANAGEMENT AND CONTROL PLAN**

30 TAC §330.371(g)-(1)

The potential for LFG migration is affected by pressure gradients caused by LFG generation and existing site conditions discussed in §1.1, Site Conditions of this LFGMP. Porous soils such as sand and gravel allow greater lateral gas migration than finer grained soils such as clay. Waste disposal units are engineered with a lining and cover system and a gas collection and control system (GCCS) that mitigate the potential for LFG migration.

The facility has constructed an approved GCCS, depicted in Figure III6-3, Existing Landfill Gas Collection and Control System designed to actively extract LFG from within the waste for control of odor and LFG migration and for compliance with federal and state air quality regulations. The GCCS consists of vertical and horizontal gas extraction wells installed within waste over constructed disposal areas. Each gas extraction well is connected to lateral piping that convey gas flow to larger header piping around the

perimeter of the landfill. An applied vacuum pulls the LFG from the extraction wells into the header piping, which conveys the LFG to the landfill gas treatment facility (LFGTF).

The Edinburg Landfill Gas Treatment Facility TCEQ Permit MSW-48038, is a Type IX facility located south of the property boundary as depicted on Figure III6-3, Existing Landfill Gas Collection and Control System. The LFGTF removes water, carbon dioxide, volatile organic compounds (VOCs), sulfur compounds, oxygen, and other trace compounds from the LFG and then compresses and delivers the LFG to an interstate pipeline for beneficial use. Any “off-gas” from the treatment process is sent to a thermal oxidizer for combustion. If the LFGTF is shut down for maintenance or emergencies, LFG is directed to a utility flare for combustion.

### **3.1 Gas Collection and Control System Design**

30 TAC §330.371(g)(2)

Ongoing expansion of the GCCS will be installed in phases based on waste placement, landfill sequencing, and regulatory requirements. Existing system components will be maintained, replaced, or expanded at the facility as system requirements change. Based on Non-methane Organic Compound (NMOC) calculations performed, the facility is subject to the GCCS installation, operation, and reporting requirements as set forth in 40 CFR Part 60, Subpart WWW & XXX. Pursuant to 30 TAC §305.70(j)(22), notification of changes made to the landfill gas collection system shall be sent within 30 days to the executive director of the TCEQ and the TCEQ Region 15 office. The notification will include an as-constructed record drawing of GCCS development with component locations such as extraction wells, lateral and header piping, condensate sumps, etc. Upon receipt of the notification, the executive director will determine if submittal of a permit modification is required.

As additional waste is placed, additional GCCS components will be installed to enhance gas recovery and control NMOC emissions. The GCCS may be installed prior to the regulatory timeframe to control odors or potential methane migration. Components will be installed in a manner that protects the integrity of the liner, leachate collection, and final cover systems and any components that penetrate the final cover system will be sealed appropriately to minimize the intrusion of water and air into the waste. A conceptual layout of a GCCS at final closure is depicted on Figure III6-4, Conceptual Landfill Gas Collection and Control System at Final Closure.

### **3.2 GCCS Components**

The GCCS will provide for the control of the LFG migration from the site and will include:

- Vertical and horizontal extraction wells
- Lateral and header piping system including condensate sumps

- Landfill gas blower flare station

### 3.2.1 Extraction Wells

Vertical extraction wells will be installed through intermediate cover soils and/or final cover system into the underlying waste and terminate at a minimum of 15 feet above the bottom of waste. These wells, fabricated of either a high-density polyethylene (HDPE) or polyvinyl chloride (PVC) material, will be constructed with perforations or slots on the lower portion of pipe and embedded in aggregate backfill.

Horizontal extraction wells will be installed laterally within the waste. These wells, fabricated of either a high-density polyethylene (HDPE) or polyvinyl chloride (PVC) material, will be constructed with 20 feet of solid pipe and with perforations or slots for the remaining length embedded in aggregate backfill.

A wellhead will be attached to the top of each extraction well to monitor and control the rate of LFG extraction. The wellhead will include a valve used to control gas flow, access, and sample ports for measuring pressure, vacuum, flow, gas composition, and for collecting LFG samples. Extraction well details are presented on Figure III6-5, Landfill Gas Collection and Control System – Extraction Well Details.

### 3.2.2 Lateral and Header Piping System

The lateral piping from the extraction wells are connected to larger header piping around the perimeter of landfill to convey gas flow to the LFGTF. This HDPE piping is installed below the intermediate cover or the final cover system to avoid damage by ongoing landfill operations. To remove condensate accumulations within the piping system, condensate knockouts and condensate sumps are installed incrementally along the landfill perimeter header piping. Condensate collected is then discharged into a sanitary sewer line for treatment at the City's POTW. Lateral and header piping details are presented on Figure III6-6, Landfill Gas Collection and Control System – Lateral and Header Piping Details.

### 3.2.3 Landfill Gas Blower Flare Station

A LFG blower-flare station with a candlestick flare are used for combustion of the LFG. The LFG blower-flare station will include the following components:

- An inlet knockout vessel to remove suspended particles and entrained liquid from the LFG;
- A flow meter to record the LFG flow;
- Blower/compressor equipment to create vacuum and withdraw the LFG from the landfill;
- Automatic valves to prevent backflow of air into the LFG collection system;
- A flame arrestor to prevent the flame from entering the LFG collection system piping;
- Flare with temperature thermocouples and pilot for destruction of the gas; and
- Miscellaneous electrical controls for automatic startup and shutdown, and monitoring equipment.

### **3.2.4 Surficial Landfill Gas Collection and Control System**

In Part III7, Closure Plan components of a synthetic grass alternate final cover system, Closure Turf®, and procedures for design, construction, testing, and documentation are described. With use of Closure Turf® or equivalent, a surficial GCCS can be incorporated into the aforementioned GCCS or installed as a standalone application.

The surficial GCCS incorporates the use of surficial collection strips and a surficial collection foot as detailed in Figure III6-7, Landfill Gas Collection and Control System – Surficial GCCS for Synthetic Grass Alternative Details. Surficial collection strips are used for LFG conveyance, allow for the proper flow of gas without causing ballooning, and provide a high flow capacity and a larger radius of influence for gas collection and control. The surficial collection foot serves as a wellhead base, geomembrane interface and gas conveyance path from the strips to the collection wellhead. Surficial collection wells will be connected to the existing GCCS system lateral and header piping system. In the event of malfunction, relief valves can discharge excess pressure to maintain the structural integrity of the surficial GCCS.

### **3.3 GCCS Monitoring and Maintenance**

Operational activities include periodic monitoring of the GCCS. Wellfield technicians visually check active extraction wells for excessive settlement, well head integrity, and to verify the condition of seals, monitoring ports, and connections. Condensate sump pumps are inspected for leaks and liquid levels within the condensate sumps are checked if there is reduction of gas flow or loss of vacuum in the lateral and header piping system. Blower flare station components are checked as needed.

To balance the extraction well field, technicians will adjust gas flow rates from the extraction wells to minimize air intrusion into the waste and for regulatory compliance. All monitoring and maintenance reports will be maintained in the site operating record. The procedures for inspection, measurement, record keeping, and maintenance of the GCCS are as required by 40 CFR Part 60, Subpart WWW & XXX and 40 CFR Part 63, Subpart A, 63.6(e)(3).

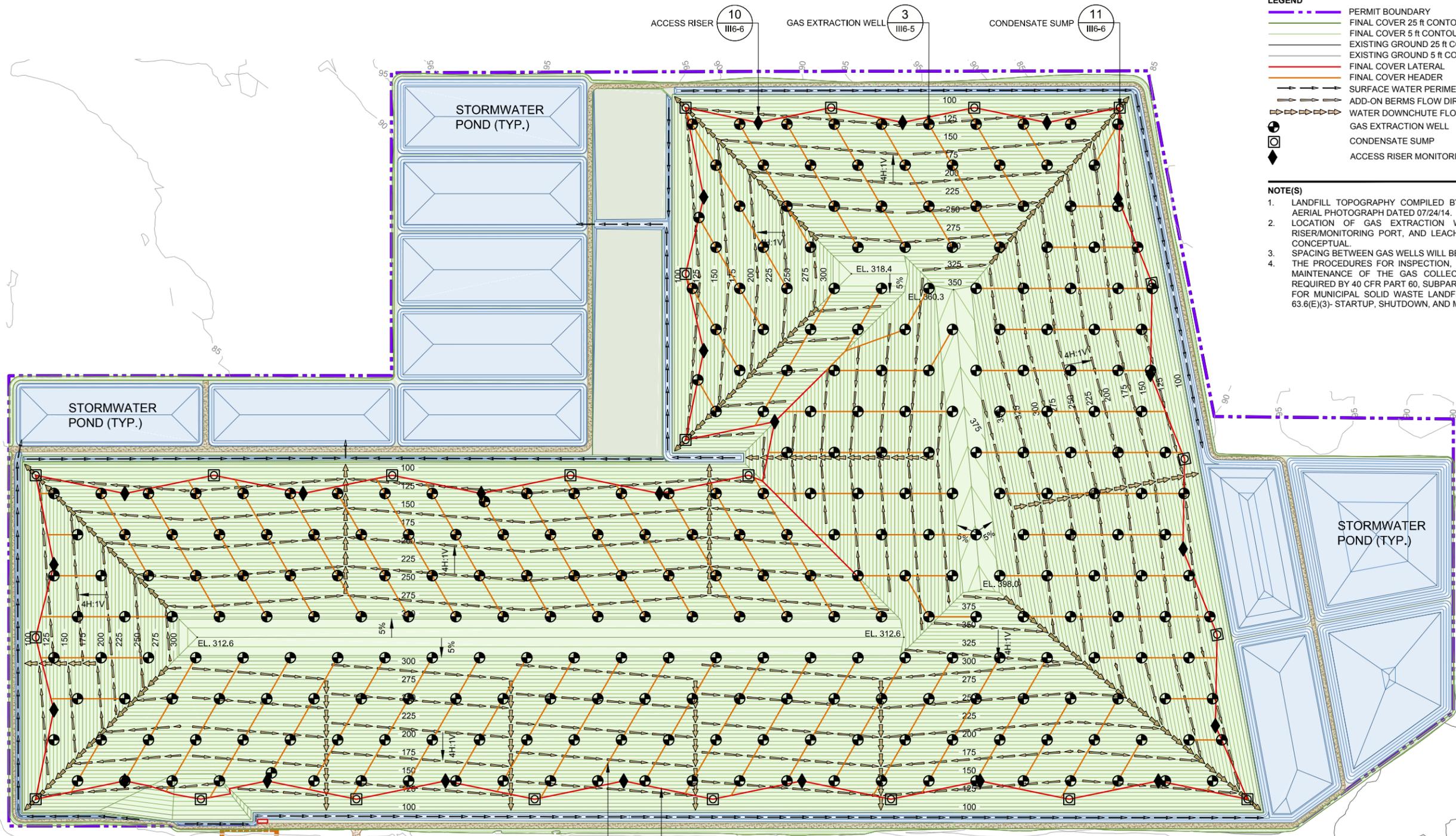
### **3.4 Backup Plan for Breakdowns**

30 TAC §330.371(g)(3)

The backup plan, in the event of possible failure or inadequate performance of the GCCS will consist of an evaluation of the system and implementation of measures to restore the system to an acceptable level of performance. The evaluation is based on performance data collected during the operation of the GCCS and any potential inadequacy discovered will be promptly corrected. If any equipment or parts required for operation of the GCCS are determined to be ineffective and need repair or replacement; backup equipment including a rental flare, blower skid, flowmeters, and any other needed equipment or parts may be used until its replacement is ready for service.

The procedures for inspection, measurement, record keeping, and maintenance of the GCCS are as required by 40 CFR Part 60, Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills and 40 CFR Part 63, Subpart A, 63.6(e)(3) – Startup, Shutdown, and Malfunction Plan.





**LEGEND**

- PERMIT BOUNDARY
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- EXISTING GROUND 25 ft CONTOUR
- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER LATERAL
- FINAL COVER HEADER
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERMS FLOW DIRECTION
- WATER DOWNCHUTE FLOW DIRECTION
- GAS EXTRACTION WELL
- CONDENSATE SUMP
- ACCESS RISER MONITORING PORT

**NOTE(S)**

1. LANDFILL TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPH DATED 07/24/14.
2. LOCATION OF GAS EXTRACTION WELLS, CONDENSATE SUMP, ACCESS RISER/MONITORING PORT, AND LEACHATE RISER PIPES ON THIS SHEET ARE CONCEPTUAL.
3. SPACING BETWEEN GAS WELLS WILL BE APPROXIMATELY 300 FT APART.
4. THE PROCEDURES FOR INSPECTION, MEASUREMENT, RECORD KEEPING, AND MAINTENANCE OF THE GAS COLLECTION AND CONTROL SYSTEM ARE AS REQUIRED BY 40 CFR PART 60, SUBPART WWW - STANDARDS OF PERFORMANCE FOR MUNICIPAL SOLID WASTE LANDFILLS AND 40 CFR PART 63, SUBPART A, 63.6(E)(3) - STARTUP, SHUTDOWN, AND MALFUNCTION PLAN.

EDINBURG LANDFILL GAS TREATMENT FACILITY  
TCEQ PERMIT MSW-48038

**ISSUED FOR PERMITTING PURPOSES ONLY**



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	CGD	CEI
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	JBF	CEI

SEAL

CHAD E. IRELAND  
99293  
LICENSED PROFESSIONAL ENGINEER

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

GOLDER ASSOCIATES

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT

EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE

**CONCEPTUAL GAS COLLECTION AND CONTROL SYSTEM AT FINAL CLOSURE**

PROJECT NO.	APPLICATION SECTION	REV.	4 of 7	FIGURE
1401491	III6	1		III6-4

1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 7

# CLOSURE PLAN

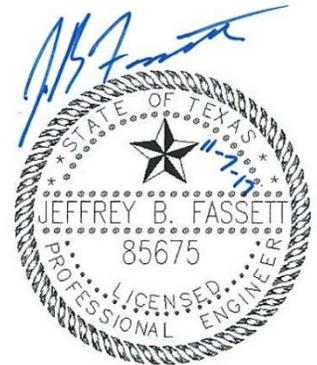
Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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PURPOSES ONLY

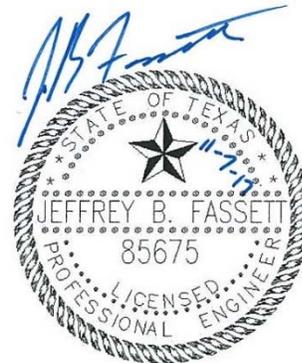
July 2017  
Revised: November 2017

Project No. 1401491



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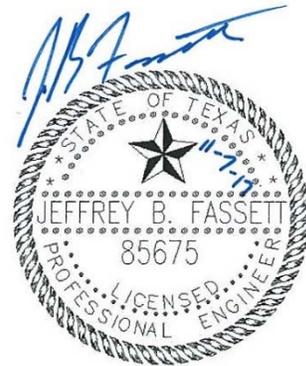
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- Appendix III7A Alternative Composite Final Cover Demonstration
- Appendix III7B Alternative Synthetic Grass Final Cover Demonstration
- Appendix III7C TCEQ Closure Plan Form
- Appendix III7D Final Cover Quality Control Plans
  - III7D-1 Conventional Composite and Alternative Composite Final Cover Systems
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## **EXECUTIVE SUMMARY**

30 TAC §330.457(e)(1)

This Closure Plan has been developed to address the requirements of Title 30 of the Texas Administrative Code (TAC) §§330.63(h) and 330.457 (Subchapter K), Closure Requirements for Municipal Solid Waste Landfill Units that Receive Waste on or after October 9, 1993. This plan includes a description of the final cover systems, a description of the steps that will be undertaken to close each filled disposal area, and the methods used to install the final cover.

## 1.0 FINAL COVER DESIGN

### 1.1 Final Contour Map

30 TAC §§330.63(h) & 330.457(e)(5)

A contour map showing the final constructed contour of the entire landfill is provided Figure III7-1, Final Contour Map. The final contours consist of 4 horizontal to 1 vertical (4H:1V) sideslopes and the upper portions of the final cover are sloped at a minimum 5-percent grade to a maximum elevation of approximately 398 ft-msl. Drainage features including on the final cover are add-on berms designed to intercept run-off from the top surface and along the sideslopes and direct it to downchutes. The downchutes convey stormwater run-off to the perimeter channels and stormwater ponds. These drainage structures as well as the drainage entering and departing the facility are shown on Figure III7-1, Final Contour Map. A perimeter berm protects the facility from flooding due to a 100-year frequency storm as depicted in Part IIC, Floodplains. Details of the surface water management features are included in Part III2, Surface Water Drainage Report. Cross-sections of the final filled condition are included as Figures III7-2A – III7-2E.

### 1.2 Final Cover System

The City shall install a final cover system for the unit that is constructed to minimize infiltration and erosion. The final cover system at the facility will consist of a conventional composite system meeting the requirements of 30 TAC §330.457(a)(1) or alternative final cover systems meeting the requirements of 30 TAC §330.457(d). The final cover systems will provide a low maintenance cover, protect against erosion, reduce rainfall percolation through the cover system and minimize leachate generation within the landfill.

#### 1.2.1 Conventional Composite System

30 TAC §330.457(a)

The conventional composite final cover will consist of the following from top to bottom:

- Erosion layer consisting of 24 inches of protective soil cover, of which the uppermost 6 inches will be capable of supporting native vegetation.
- Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer.
- 40-mil linear low-density polyethylene (LLDPE) textured geomembrane that has a permeability less than or equal to the permeability of the bottom liner system.
- 18-inch thick compacted clay rich earthen material with a hydraulic conductivity of  $1 \times 10^{-5}$  cm/sec or less.

Figure III7-3A, Conventional Composite Final Cover Details includes final cover and drainage feature installation details.

The erosion layer shall be composed of no less than two feet of soil where the first 18 inches shall be of clayey soil and the uppermost 6 inches shall be of suitable topsoil that is capable of sustaining native plant growth and shall be seeded or sodded immediately following the application of the final cover in order to minimize erosion.

Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer shall be installed top of the geomembrane to prevent the buildup of excess pore water pressure at the on the geomembrane interface. Calculations are provided in Part III, Waste Management Unit Design Report.

A 40-mil linear low-density polyethylene (LLDPE) textured geomembrane that has a permeability less than or equal to the permeability of any bottom liner system shall be installed on top of an 18-inch thick compacted clay rich earthen material with a hydraulic conductivity of  $1 \times 10^{-5}$  cm/sec or less. The thickness of the 40-mil LLDPE textured geomembrane is of adequate thickness to ensure proper seaming.

### 1.2.2 *Alternative Composite System*

30 TAC §330.457(d)

The alternative composite final cover varies from the conventional composite system by substituting a geosynthetic clay liner for the 18-inch thick compacted clay rich earthen material and will consist of the following from top to bottom:

- Erosion layer consisting of 24 inches of protective soil cover, of which the uppermost 6 inches will be capable of supporting native vegetation.
- Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer.
- 40-mil linear low-density polyethylene (LLDPE) textured geomembrane that has a permeability less than or equal to the permeability of the bottom liner system.
- Geosynthetic Clay Liner.

Figure III7-3B, Alternative Composite Final Cover Details includes final cover and drainage feature installation details.

Appendix III7A, Alternative Composite Final Cover Demonstration shows that use of geosynthetic clay liner achieves a greater or equal to reduction in infiltration in comparison to 18-inch thick compacted clay rich earthen material.

### 1.2.3 *Alternative Synthetic Grass System*

30 TAC §330.457(d)

The alternative synthetic grass final cover will consist of the following from top to bottom:

- HDPE synthetic grass

- Sand infill
- Woven geotextile filter backing
- 50-mil linear low density polyethylene (LLDPE) Super Gripnet® geomembrane with integrated drainage layer

Figure III7-3C, Alternative Synthetic Grass Final Cover Details includes final cover and drainage feature installation details.

Appendix III7B, Alternative Synthetic Grass Final Cover Demonstration shows that ClosureTurf® provides a level of infiltration reduction and wind and water protection that is greater than or equal to the level of protection provided by the standard composite final cover system. In addition, the ClosureTurf® offers other advantages over the standard composite final cover system.

## 2.0 CLOSURE

Waste disposal areas designated as units in this application do not have discrete individual final cover systems but share one final cover; therefore, for the purposes of closure, they will be collectively referred to as the MSW landfill unit. Final cover installation will be done in installments as areas of the MSW landfill unit attain permitted elevation. Part II, Facility Layout of this application describes the anticipated schedule of development for the facility. Figures II-20 – II-25, Operational Sequence I – VI show areas of final cover placement as waste is filled to permitted elevation.

### 2.1 Maximum Closure Area

30 TAC §330.457(e)(2)

Based on the Figure II-20A, Operational Fill Sequence I of site development discussed in Part II, Facility Layout of this application, the maximum closure area or estimate of the largest area of the MSW landfill unit ever requiring final cover at any time during the active life is approximately 159.1 acres. Figure III7-4, Maximum Closure Area includes the active face and areas with daily or intermediate cover in place.

### 2.2 Maximum Inventory of Wastes

30 TAC §330.457(e)(3)

The maximum inventory of waste ever on-site over the active life of the facility is both the capacity of MSW landfill unit and storage or processing areas. Waste in storage or processing areas at final facility closure will either be disposed in the landfill or transported to an authorized facility, therefore the maximum inventory of waste is the capacity of the MSW landfill unit.

#### 2.2.1 Facility

The maximum inventory of waste ever on-site over the active life of the facility is 87,301,156 cubic yards as demonstrated in Part III3A-1, Volume Calculations of this application. The volume represents

the total volume available for in-place solid waste and daily and intermediate cover soils. Wastes accepted for disposal in accordance with Part II, Waste Acceptance Plan are typically compacted in place at the working face as they are received.

### **2.2.2 Storage or Processing Areas**

Waste in storage or processing areas at final facility closure will either be disposed in the landfill or transported to an authorized facility. Closure for the storage and processing areas at the site is addressed as follows:

- Mulch area: Brush will be mulched used for erosion control applications.
- Liquid waste stabilization area: Upon closure, the waste remaining in the stabilization basin will be properly stabilized and disposed of in the landfill. The stabilization basin will be disposed of within the landfill.
- Whole tire staging area: At time of closure, tires in the staging area will be processed by grinding or other means to reduce size to quartered or split and disposed of in the landfill or another authorized facility.
- Large Item/White Goods Storage Area: Large items/white goods stored on-site at time of closure will be either transported offsite for recycling or disposed of at an authorized facility.
- Reusable materials staging area: Reusable materials will transported off-site for to reusable material end user locations.

## **2.3 MSW Landfill Unit Closure Implementation**

30 TAC §330.457(e)(4)

A schedule for completing all activities necessary to satisfy the closure criteria for the MSW landfill unit is as follows in accordance with 30 TAC §330.457(f). The closure process will follow the procedures listed in Appendix III7C, TCEQ Closure Plan Form.

### **2.3.1 Closure Plan Placed in Operating Record by Initial Receipt of Waste**

30 TAC §330.457(f)(1)

Because waste is currently received by the facility under TCEQ Permit MSW-956B, the City shall place a copy of this closure plan in the operating record upon issuance of TCEQ Permit MSW-956C.

### **2.3.2 Closure Notice to TCEQ**

30 TAC §330.457(f)(2)

No later than 45 days prior to the initiation of closure activities for the MSW landfill unit, the City shall provide written notification to the TCEQ of the intent to close the unit and place this notice of intent in the operating record.

### **2.3.3 Begin Closure Activities**

30 TAC §330.457(f)(3)

The City shall begin closure activities for the MSW landfill unit no later than 30 days after the date on which the unit receives the known final receipt of wastes or, if the unit has remaining capacity and there is a reasonable likelihood that the unit will receive additional wastes, no later than one year after the most recent receipt of wastes. A request for an extension beyond the one-year deadline for the initiation of closure may be submitted to the TCEQ for review and approval and shall include all applicable documentation necessary to demonstrate that the unit has the capacity to receive additional waste and that the City has taken and will continue to take all steps necessary to prevent threats to human health and the environment from the MSW landfill unit.

### **2.3.4 Complete Closure Activities**

30 TAC §330.457(f)(4)

The City shall complete closure activities for the MSW landfill unit within 180 days following the initiation of closure activities. These activities include placing all the final cover components to design grades and elevations over the waste mass utilizing methods, procedures, and specifications described in the Final Cover Quality Control Plan and installation of any outstanding or replacement of any damaged post-closure monitoring devices such as monitoring wells, gas probes, and the gas collection system. A request for an extension for the completion of closure activities may be submitted to the TCEQ for review and approval and shall include all applicable documentation necessary to demonstrate that closure will, of necessity, take longer than 180 days and all steps have been taken and will continue to be taken to prevent threats to human health and the environment from the unclosed MSW landfill unit.

### **2.3.5 Following Completion of Closure Activities**

30 TAC §330.457(f)(5)

Following completion of all closure activities for the MSW landfill unit, the City shall comply with the post-closure care requirements specified in Part III8, Post-Closure Plan. The City shall submit to the TCEQ by registered mail for review and approval a certification, signed by an independent licensed professional engineer, verifying that closure has been completed in accordance with this closure plan. The submittal to the executive director shall include all applicable documentation necessary for certification of closure. Once approved, this certification shall be placed in the operating record.

### **2.3.6 TCEQ Closure Acknowledgement**

30 TAC §330.457(f)(6)

Following receipt of the required closure documents, as applicable, and an inspection report from the TCEQ's regional office verifying proper closure of the MSW landfill unit according to this closure plan, the TCEQ may acknowledge the termination of operation and closure of the unit and deem it properly closed.

## **2.4 Final Facility Closure**

Certification of final facility closure will be accomplished in accordance with 30 TAC §330.461.

### **2.4.1 Public Notice**

30 TAC §330.461(a)

No later than 90 days prior to the initiation of a final facility closure, the City shall, through a public notice in the newspaper(s) of largest circulation in the vicinity of the facility, provide public notice for final facility closure. This notice shall provide the name, address, and physical location of the facility; the permit, registration, or notification number, as appropriate; and the last date of intended receipt of waste. The City shall also make available an adequate number of copies of the approved final closure and post-closure plans for public access and review.

### **2.4.2 Written Notification to TCEQ**

30 TAC §330.461(a)

No later than 90 days prior to the initiation of a final facility closure, the City shall provide written notification to the TCEQ of the intent to close the facility and place this notice of intent in the operating record.

### **2.4.3 Facility Closure Sign Posting**

30 TAC §330.461(b)

Upon written notification to the TCEQ, the City shall post a minimum of one sign at the main entrance and all other frequently used points of access for the facility notifying all persons who may utilize the facility of the date of closing for the entire facility and the prohibition against further receipt of waste materials after the stated date.

#### **2.4.4 Access Barriers**

30 TAC §330.461(b)

Upon written notification to the TCEQ, suitable barriers shall be installed at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

#### **2.4.5 Deed Recordation**

30 TAC §330.457(g) & §330.461(c)(1)

Within ten days after closure of the MSW landfill unit, the City shall submit to the TCEQ by registered mail a certified copy of an "affidavit to the public" in accordance with the requirements of 30 TAC §330.19, Deed Recordation and place a copy of the affidavit in the operating record. In addition, the City shall record a certified notation of the deed to the facility property, or on some other instrument that is normally examined during title search, that will in perpetuity notify any potential purchaser of the property that the land has been used as a landfill facility and use of the land is restricted according to the provisions specified in 30 TAC §330.465 Certification of Post-Closure Care. The City shall submit a certified copy of the modified deed to the TCEQ and place a copy of the modified deed in the operating record.

#### **2.4.6 Certification**

30 TAC §330.461(c)(2)

Within ten days after completion of final closure activities, a certification, signed by an independent licensed professional engineer, verifying that final facility closure has been completed in accordance with this closure plan. The submittal to the TCEQ shall include all applicable documentation necessary for certification of final facility closure. Once approved, the certification will be placed in the site's operating record.

Following receipt of the required final closure documents and an inspection report from the TCEQ's regional office verifying proper closure of the facility according to this closure plan, the TCEQ may acknowledge the termination of operation and closure of the facility and deem it properly closed. Post-closure care maintenance will begin immediately upon the date of final closure as approved by the TCEQ. All post-closure land use will comply with 30 TAC §330.463, as indicated in the Post-Closure Plan. Appendix III7C, TCEQ Closure Plan Form, provides guidance to detail the plan for closure of a landfill unit, closure of associated storage or processing areas, and final closure of the facility to meet the requirements in 30 TAC Chapter 330, §330.63(h) and 30 TAC Chapter 330 Subchapter K for a MSW Type I facility.

### **3.0 FINAL COVER QUALITY CONTROL PLAN**

30 TAC §330.457(c)

Appendix III7D, Final Cover Quality Control Plan (FCQCP) describes the final cover system design, construction, and evaluation protocol and processes, including the personnel, materials, methods, sampling and testing standards, procedures, and practices to be used in procuring, handling, installing, and evaluating all elements of the final cover system. It establishes the material requirements; personnel qualifications and roles; installation requirements; quality control and quality assurance monitoring, testing, documentation, and reporting programs to be used during construction of each component of the final cover system to assure and to verify that the final cover system is constructed as designed and in accordance with applicable rules and technical standards. The alternative synthetic grass final cover differs considerably from the conventional composite final cover and the alternative composite final cover, therefore a separate FCQCP has been prepared.

- Appendix III7D-1 – Conventional Composite and Alternative Composite Final Cover Systems.
- Appendix III7D-2 – Alternative Synthetic Grass Final Cover System.



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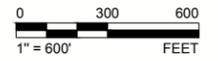
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- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- GP-107 GAS PROBE
- MW-107 GROUNDWATER MONITORING WELL
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERM FLOW DIRECTION
- DOWNCHUTE FLOW DIRECTION

**NOTE(S)**

1. TOP OF FINAL COVER GRADES ARE SHOWN ON THIS SHEET.
2. TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/2014.
3. SEE PART III.2, SURFACE WATER DRAINAGE REPORT, FOR DETAILS OF STORMWATER MANAGEMENT FEATURES.



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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE  
MANAGEMENT

CONSULTANT

Golder Associates

HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FINAL CONTOUR MAP**

PROJECT NO. 1401491	APPLICATION SECTION III.7	REV. 1	1 of 10	FIGURE III.7-1
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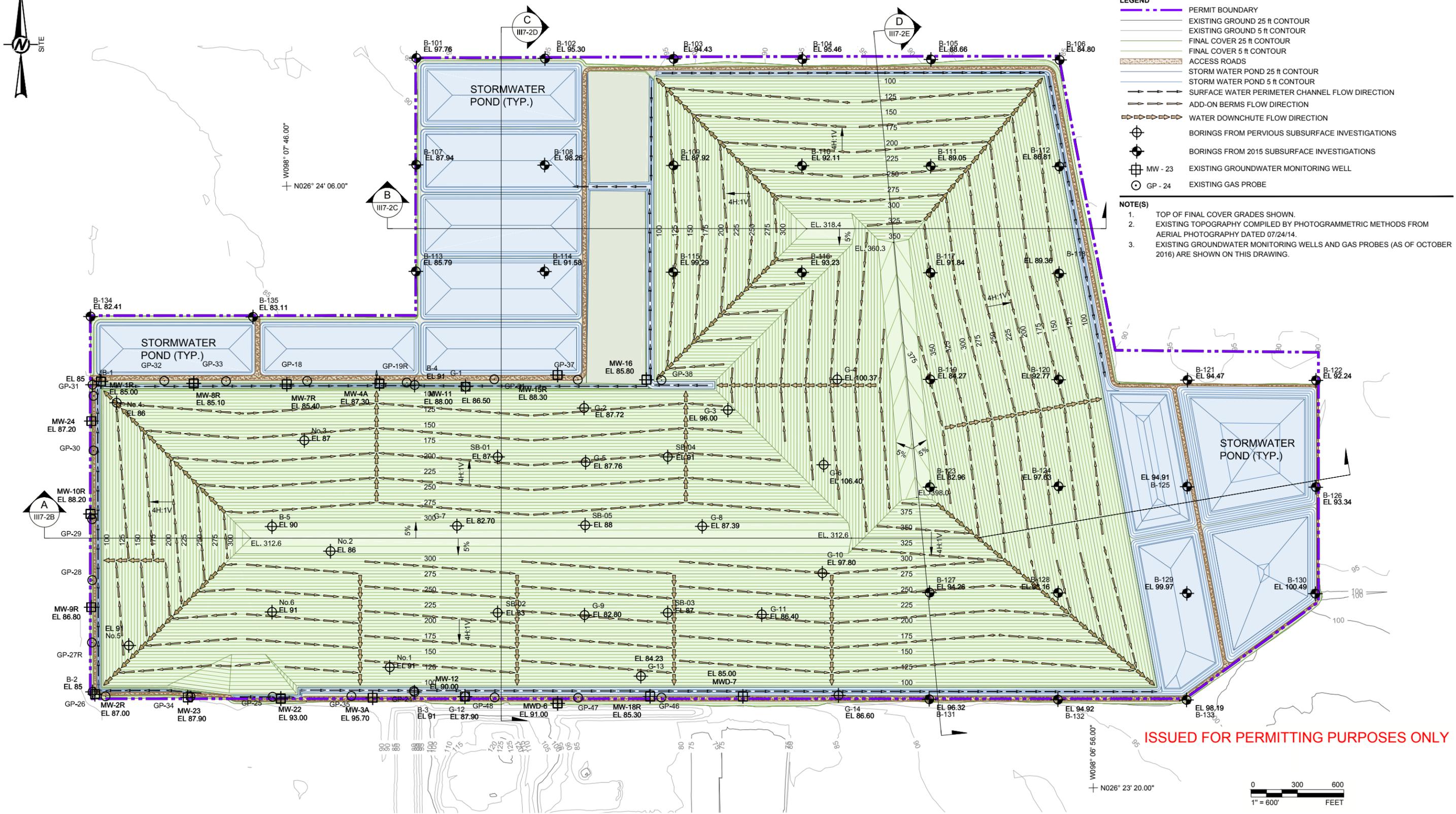


**LEGEND**

- PERMIT BOUNDARY
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- EXISTING GROUND 5 ft CONTOUR
- FINAL COVER 25 ft CONTOUR
- FINAL COVER 5 ft CONTOUR
- ACCESS ROADS
- STORM WATER POND 25 ft CONTOUR
- STORM WATER POND 5 ft CONTOUR
- SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION
- ADD-ON BERMS FLOW DIRECTION
- WATER DOWNCHUTE FLOW DIRECTION
- ⊕ BORINGS FROM PVIOUS SUBSURFACE INVESTIGATIONS
- ⊕ BORINGS FROM 2015 SUBSURFACE INVESTIGATIONS
- ⊕ MW - 23 EXISTING GROUNDWATER MONITORING WELL
- ⊕ GP - 24 EXISTING GAS PROBE

**NOTE(S)**

1. TOP OF FINAL COVER GRADES SHOWN.
2. EXISTING TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS FROM AERIAL PHOTOGRAPHY DATED 07/24/14.
3. EXISTING GROUNDWATER MONITORING WELLS AND GAS PROBES (AS OF OCTOBER 2016) ARE SHOWN ON THIS DRAWING.



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1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	MX	JBF
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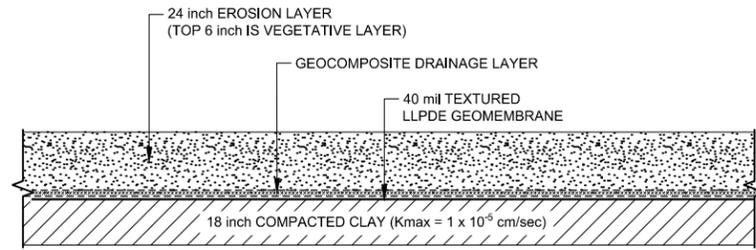
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TITLE

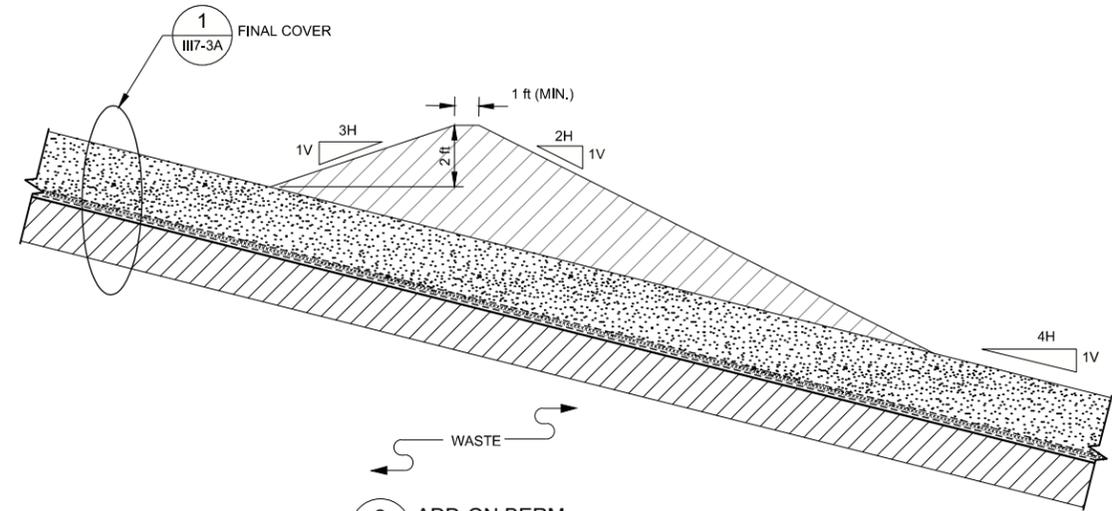
**FILL CROSS-SECTIONS LOCATION MAP**

PROJECT NO.	APPLICATION SECTION	REV.	2 of 10	FIGURE
1401491	III7	1		III7-2A

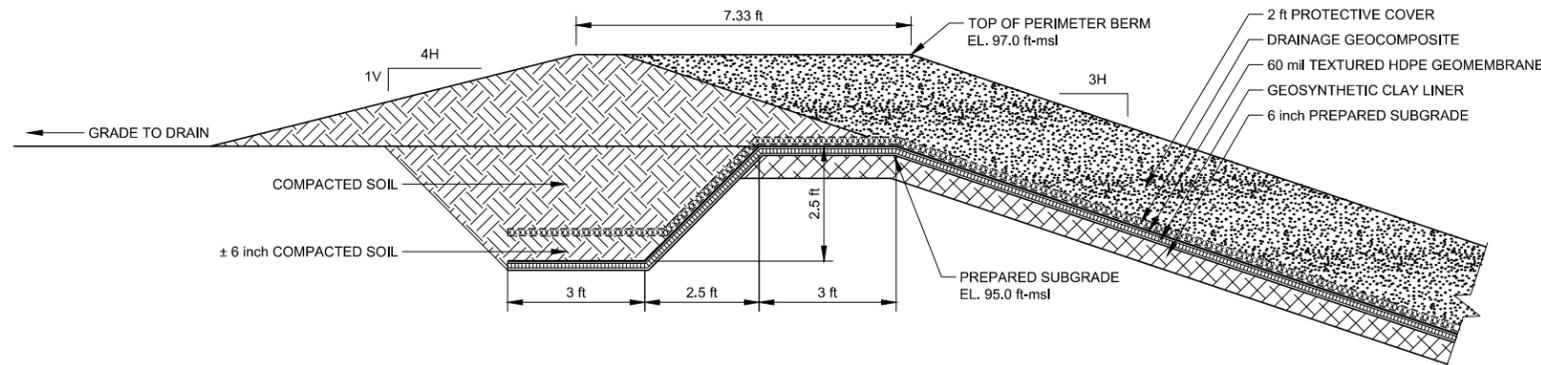
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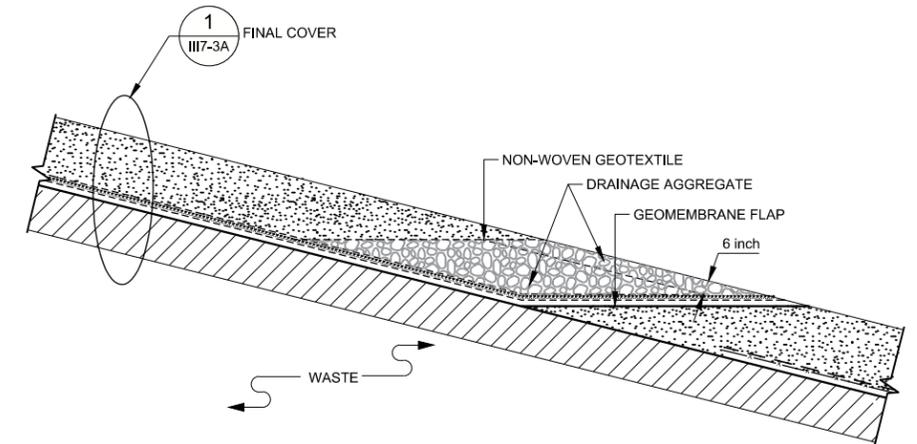
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III7-3A



SCALE 1" = 6' **2** ADD-ON BERM  
III7-3A



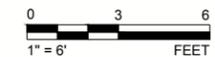
SCALE 1" = 4' **3** LANDFILL PERIMETER  
III7-3A



NOTE: SPACING OF FINAL COVER DAYLIGHT IS DEPENDENT ON THE TRANSMISSIVITY OF THE GEOCOMPOSITE DRAINAGE LAYER USED. PLEASE REFER TO PART III3B-2E-2, FINAL COVER DRAINAGE LAYER CAPACITY FOR SPACING REQUIREMENTS.

SCALE 1" = 6' **4** FINAL COVER DAYLIGHT  
III7-3A

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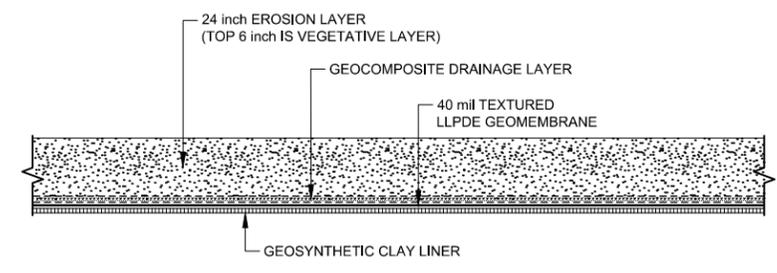
HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
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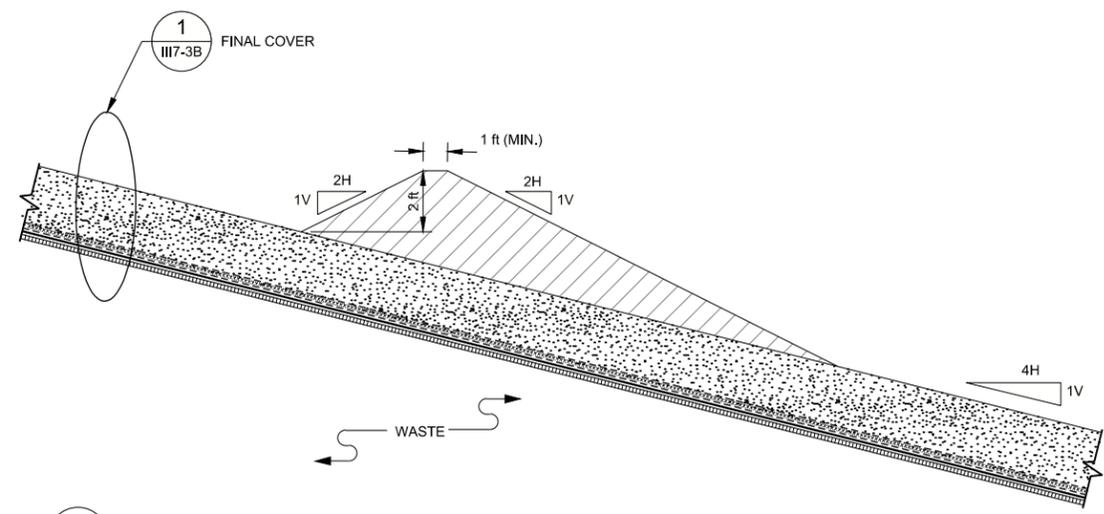
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**CONVENTIONAL COMPOSITE FINAL COVER DETAILS**

PROJECT NO. 1401491    APPLICATION SECTION III7    REV. 1    7 of 10    FIGURE III7-3A

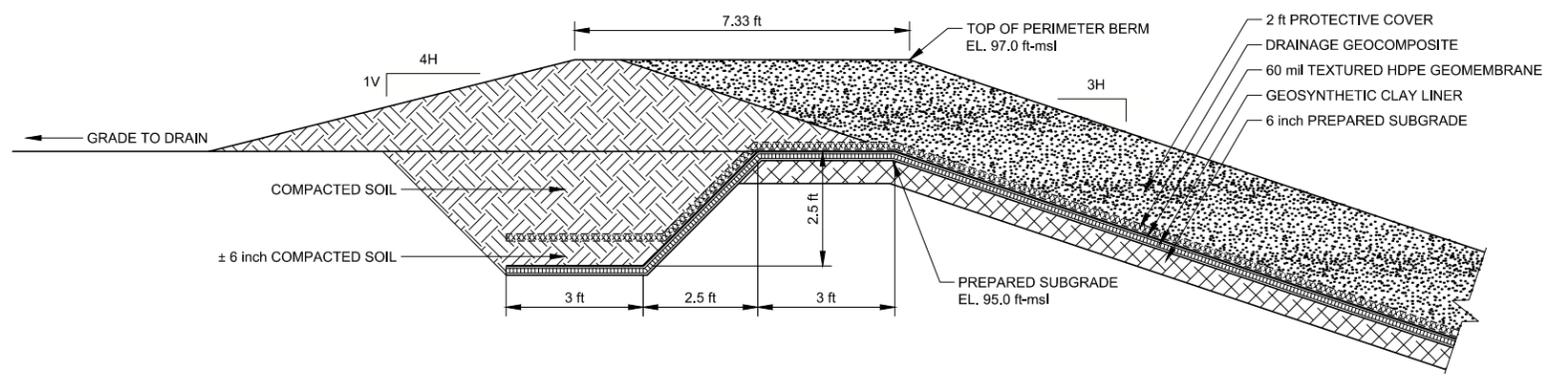
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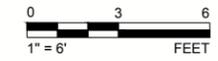


SCALE 1" = 6' **2** ADD-ON BERM  
III7-3B



SCALE 1" = 4' **3** LANDFILL PERIMETER  
III7-3B

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

SEAL

JEFFREY B. FASSETT  
85675  
LICENSED PROFESSIONAL ENGINEER  
STATE OF TEXAS

GOLDER ASSOCIATES INC.  
TEXAS REGISTRATION F-2578

CLIENT

CITY OF EDINBURG  
SOLID WASTE MANAGEMENT

CONSULTANT

Golder Associates

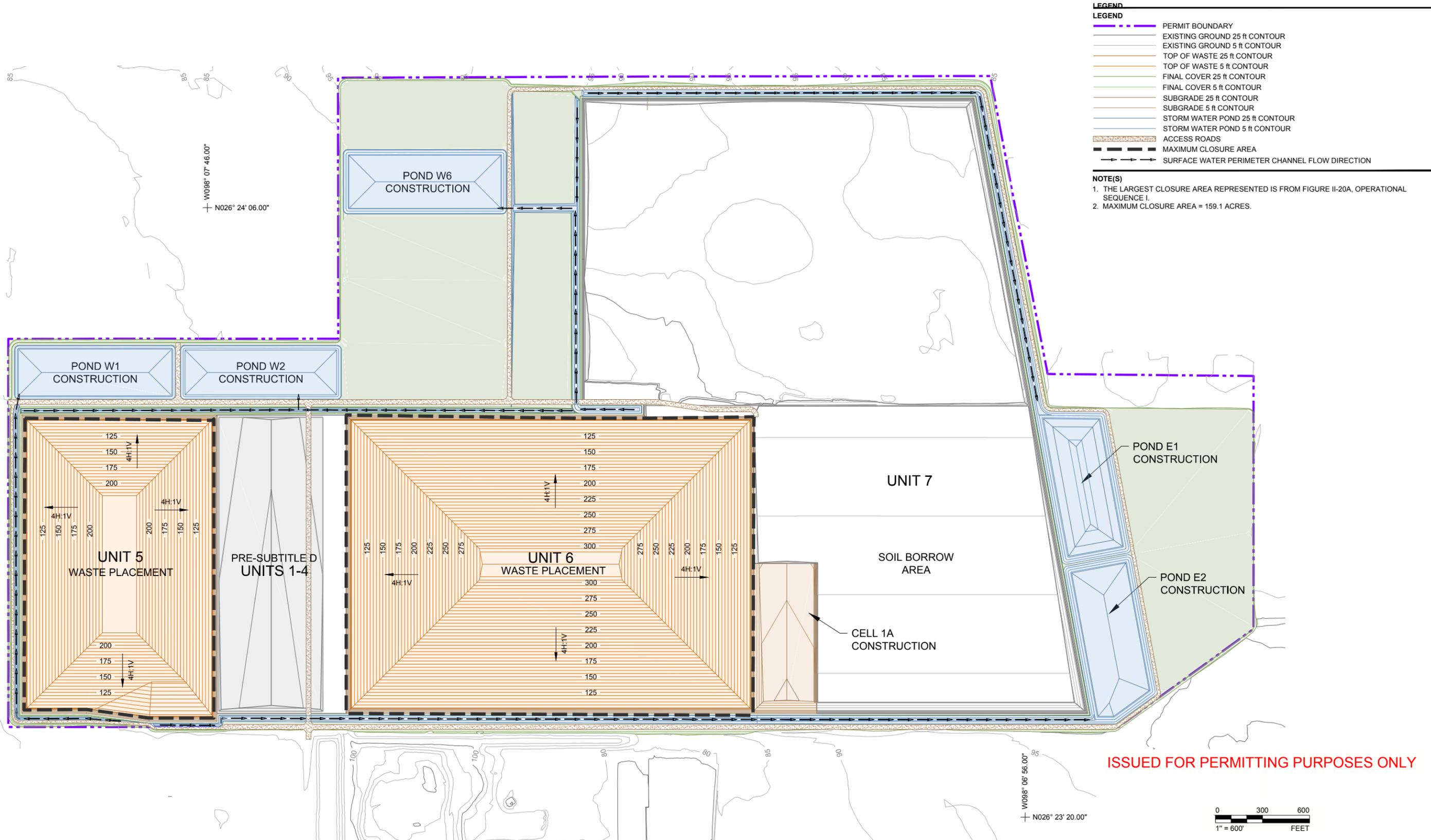
HOUSTON OFFICE  
500 CENTURY PLAZA DRIVE, SUITE 190  
HOUSTON, TEXAS  
USA  
[+1] (281) 821-6868  
www.golder.com

PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**ALTERNATIVE COMPOSITE FINAL COVER DETAILS**

PROJECT NO. 1401491    APPLICATION SECTION III7    REV. 1    8 of 10    FIGURE III7-3B

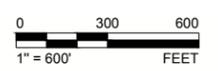
1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B



- LEGEND**
- PERMIT BOUNDARY
  - EXISTING GROUND 25 ft CONTOUR
  - EXISTING GROUND 5 ft CONTOUR
  - TOP OF WASTE 25 ft CONTOUR
  - TOP OF WASTE 5 ft CONTOUR
  - FINAL COVER 25 ft CONTOUR
  - FINAL COVER 5 ft CONTOUR
  - SUBGRADE 25 ft CONTOUR
  - SUBGRADE 5 ft CONTOUR
  - STORM WATER POND 25 ft CONTOUR
  - STORM WATER POND 5 ft CONTOUR
  - ACCESS ROADS
  - MAXIMUM CLOSURE AREA
  - SURFACE WATER PERIMETER CHANNEL FLOW DIRECTION

- NOTE(S)**
1. THE LARGEST CLOSURE AREA REPRESENTED IS FROM FIGURE II-20A, OPERATIONAL SEQUENCE I.
  2. MAXIMUM CLOSURE AREA = 159.1 ACRES.

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REV.	YYYY-MM-DD	DESCRIPTION	DESIGNED	PREPARED	REVIEWED	APPROVED
1	2017-11-07	RESPONSE TO TCEQ FIRST NOTICE OF DEFICIENCY	CEI	TNB	MX	JBF
0	2017-07-21	PERMIT AMENDMENT APPLICATION SUBMITTAL	CEI	AA	MX	JBF

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HOUSTON OFFICE  
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HOUSTON, TEXAS  
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[+1] (281) 821-6868  
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PROJECT  
EDINBURG REGIONAL DISPOSAL FACILITY  
PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**MAXIMUM CLOSURE AREA**

PROJECT NO. 1401491	APPLICATION SECTION 1117	REV. 1	10 of 10	FIGURE 1117-4
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1 in. IF THIS MEASUREMENT DOES NOT MATCH WHAT IS SHOWN, THE SHEET SIZE HAS BEEN MODIFIED FROM ANSI B

## PART III, ATTACHMENT 7, APPENDIX A

# ALTERNATE COMPOSITE FINAL COVER DESIGN DEMONSTRATION

Edinburg Regional Disposal Facility

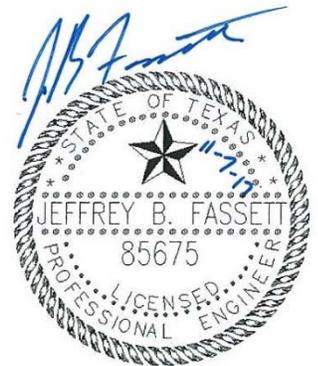
Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017



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

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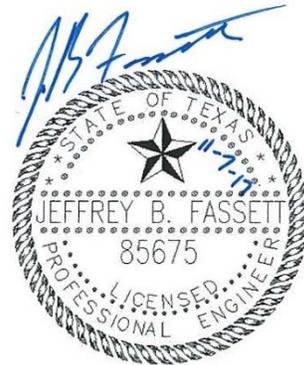
Project No. 1401491

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1.1	Alternative Composite Liner System.....	1
2.0	EQUIVALENCY.....	1
2.1	Leakage Rate Estimates.....	1
2.2	Wind And Water Erosion.....	2
3.0	SUMMARY.....	2

## List of Appendices

Appendix III7AA      Infiltration Rate Comparison – GCL Alternate Final Cover



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## 1.0 INTRODUCTION

This alternative composite final cover design demonstration will demonstrate that the use of geosynthetic clay liner (GCL) will provide equivalent infiltration and protection from wind and water erosion as the conventional composite final cover defined in 30 TAC §330.457(a).

### 1.1 Alternative Composite Liner System

The alternative composite final cover system is summarized in below.

<b>GCL Alternative Final Cover System</b>
24-inch thick erosion layer
Double-sided geocomposite drainage layer
40-mil LLDPE textured geomembrane
GCL

GCLs are geocomposite materials of low hydraulic conductivity used frequently in liner systems. Several manufacturers produce GCLs with varying characteristics. In general, GCLs are manufactured by placing powdered or granulated bentonite on a geotextile or geomembrane substrate. The bentonite layer is typically 7 to 10 mm thick (following hydration) and is placed at a unit weight of approximately 0.8 pounds per square feet (lb/ft<sup>2</sup>). The GCLs with a geotextile substrate also have a covering geotextile, which is often needle-punched, connecting the underlying geotextile to increase the structural integrity. Non-woven and woven geotextiles of various weights are used.

Typically, the permeability of the bentonite component of GCLs ranges from less than  $1 \times 10^{-9}$  to  $5 \times 10^{-9}$  cm/sec.

## 2.0 EQUIVALENCY

### 2.1 Leakage Rate Estimates

The leakage through composite liners can be estimated using the “Giroud equation”, presented in Giroud et al, 1997. The method requires several assumptions regarding the characteristics of the composite liner. First, it is assumed that permeation through the full area of the geomembrane is insignificant in comparison to rapid leakage through isolated defects or holes. It is also necessary to make assumptions regarding the extent to which intimate contact has been achieved. A composite liner that possesses intimate contact has been constructed such that the geomembrane lies flush with the surface of the underlying clay component, with few or no gaps between the two liners. When intimate contact has been

achieved, the effective area of leakage is very small, and the total liner system leakage is minimized. This phenomenon is referred to as “composite action.”

The equation used in the analysis is derived both from theoretical models of fluid flow and from empirical analyses of actual composite liner systems. Flow through a circular defect in a composite liner is calculated as:

$$Q = C[1+0.1(h/t_s)^{0.95}]a^{0.1}h^{0.9}k_s^{0.74}$$

where:

- Q = rate of leakage through a defect (m<sup>3</sup>/sec)
- C = Dimensionless constant related to the quality of the intimate contact between the geomembrane and the underlying soil component
- h = hydraulic head on the geomembrane (m)
- t<sub>s</sub> = thickness of the low-permeability soil component (i.e., the CCL or GCL) (m)
- a = area of geomembrane defect (m<sup>2</sup>)
- k<sub>s</sub> = permeability of soil component (i.e., CCL or GCL) (m/s)

Using the above equation, the conventional composite final cover system was compared to the alternative composite final cover system for both “good” and “poor” intimate contact and for circular holes with an area of 0.1 and 1.0 cm<sup>2</sup>.

As shown on the calculations in Appendix III7AA, Infiltration Rate Comparison – GCL Alternate Final Cover for each condition, the alternative composite final cover had calculated leakage rates approximately 1/250<sup>th</sup> that of the geomembrane/compacted clay liner system.

## 2.2 Wind And Water Erosion

The alternative composite final cover surface will be seeded or sodded.

## 3.0 SUMMARY

Based on this analysis, it is apparent that substituting a GCL for an 18-inch thick compacted clay rich earthen material with a hydraulic conductivity of 1x10<sup>-5</sup> cm/sec provides a level of infiltration reduction and wind and water protection that is greater than or equal to the level of protection provided by the conventional composite final cover system.

**APPENDIX III7AA**

**INFILTRATION RATE COMPARISON – GCL ALTERNATE FINAL COVER**

## INFILTRATION RATE COMPARISON - GCL ALTERNATE FINAL COVER

Made By: JBF  
 Checked by: CEI  
 Reviewed by: MX

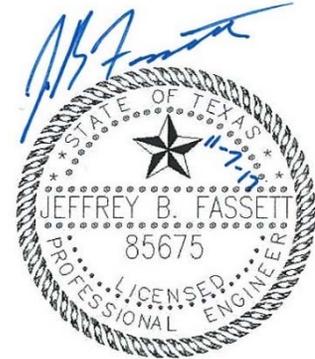
### OBJECTIVE

Compare the infiltration rate through a conventional composite final cover system with the infiltration rate through the alternative composite final cover system.

### GIVEN

The conventional composite final cover system consists of a 40-mil geomembrane overlying a 18-inch thick compacted clay rich material with a maximum hydraulic conductivity of  $1 \times 10^{-5}$  cm/s.

In the alternative composite final cover system, the compacted clay rich (the infiltration layer) material will be replaced with a geosynthetic clay liner (GCL). Both final covers include a geocomposite drainage layer above the geomembrane.



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#### Infiltration Layer Properties

$k = 1.00E-05$  cm/s  
 $t = 1.5$  ft  
 $h = 0.2$  inches  
 sized to prevent head > 0.2 inches when cover soil saturated)

#### GCL Properties

$k = 5.00E-09$  cm/s  
 $t = 7$  mm  
 $h = 0.2$  inches  
 (geocomposite drainage layer sized to prevent head > 0.2 inches when cover soil saturated)

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### METHOD

Estimate the infiltration rate through each final cover system using the Giroud Equation (Ref. 1). Compare the infiltration rate through composite final cover systems consisting of a geomembrane/clay rich material and a geomembrane/GCL.

Infiltration through composite geomembrane/GCL liner.

$$Q = C[1+0.1(h/t_s)^{0.95}]a^{0.1}h^{0.9}k_s^{0.74} \quad \text{Ref 1}$$

where:

$C = 0.21$  for good contact  
 $1.15$  for poor contact

$h =$  head (m)

$t_s =$  thickness of low permeability soil component (i.e. CCL or GCL) (m)

$a =$  area of hole ( $m^2$ )

$k_s =$  hydraulic conductivity of CCL or GCL (m/s)

## RESULTS

### Leakage Rate Per Defect

Intimate Contact		Good		Poor	
Composite Cover System		GM/Clay	GM/GCL	GM/Clay	GM/GCL
Leakage (m <sup>3</sup> /sec)	0.1 cm <sup>2</sup> hole	3.79E-09	1.46E-11	2.07E-08	8.02E-11
	1 cm <sup>2</sup> hole	4.77E-09	1.84E-11	2.61E-08	1.01E-10

### Comparison

Intimate Contact	$Q_{GM/Clay}/Q_{GM/GCL}$	
	0.1 cm <sup>2</sup> hole	1 cm <sup>2</sup> hole
Good	259	259
Poor	259	259

## CONCLUSION

Based on this analysis, the infiltration rate through an alternative composite final cover system with a GCL will be approximately 1/250th that of the conventional composite final system with a clay rich infiltration layer.

## REFERENCE

- 1) Giroud, J.P., "Equations for Calculating the Rate of Liquid Migration Through Composite Liners Due to Geomembrane Defects", Geosynthetics International, Vol. 4, Nos. 3-4, pp. 335-348, 1997.

**APPENDIX III7C  
TCEQ CLOSURE PLAN FORM**



# Texas Commission on Environmental Quality

## Closure Plan for Municipal Solid Waste Type I Landfill Units and Final Facility Closure

This form is for use by applicants or site operators of Municipal Solid Waste (MSW) Type I landfills to detail the plan for closure of a landfill unit, closure of associated storage or processing units, and final closure of the facility to meet the requirements in 30 TAC Chapter 330, §330.63(h) and 30 TAC Chapter 330 Subchapter K for a MSW Type I facility.

If you need assistance in completing this form, please contact the MSW Permits Section in the Waste Permits Division at (512) 239-2335.

### I. General Information

Facility Name: Edinburg Regional Disposal Facility

MSW Permit No.: MSW-956C

Site Operator/Permittee Name: City of Edinburg

### II. Landfill and Other Waste Management Units and Operations Requiring Closure at the Facility

#### A. Facility Units

*Table 1. Description of the Landfill Unit. (Note the contiguous waste disposal areas designated as units in this application collectively share one final cover system and comprise a single landfill unit)*

Name or Descriptor of Unit	Operating Status of Unit	Type of Liner System Under Unit	Above Grade Class 1 Disposal Cells in this Unit	Below Grade Class 1 Disposal Cells in this Unit	Other Class 1 Disposal Cells in this Unit (describe)	Size of Unit's Waste Footprint (acres)	Maximum Inventory of Waste Ever in Unit (cubic yards)	Other Necessary Information that Pertains to the Unit
Pre-Subtitle D Units 1 - 4	Inactive	None Few cells have GM	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	29.2	1,027,858	Final cover soil in place. Certification not found.
Unit 5	Active	Alternative liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	52.9	3,723,273	
Unit 6	Active	Alternative liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	110.8	11,983,781	
Unit 7 and Unit 8 / Overliner	Construction following permit issuance	Alternative liner	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	213.1	70,566,243	Unit 8 or Overliner option to be constructed
Totals						406.0	87,301,156	

**Closure Plan for Type I Landfill Unit and Facility**

Facility Name: Edinburg Regional Disposal Facility  
 Permit No: MSW-956C  
 November 2017

Revision No.: 0  
 Date: July 2017, Revised:

*Table 2. Description of Waste Storage or Processing Areas or Operations Associated with this Permit.*

Type of Storage or Processing Unit or Operation (individual units may be closed at any time prior to or during the final facility closure as described in this plan)	Operational Status of Unit	Size of the Area Used for the Storage or Processing Unit or Operation (Acres)	Maximum Inventory of Waste Ever in Storage or Processing Unit or Operation (indicate cubic yards or tons)	Other Information (enter other necessary information that pertains to the unit)
Mulching	Active	1.0	4,000 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	<i>Waste in storage or processing areas will either be disposed in the landfill or transported to an authorized facility. Therefore inventory of waste in storage or processing areas or operations is included in capacity of the landfill unit.</i>
Liquid Stabilization	Operational following permit issuance	0.04	400 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	
Reusable Materials	Active	0.02	200 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	
Whole Tire Staging	Active	0.004	40 - Assumed <input checked="" type="checkbox"/> cubic yards <input type="checkbox"/> tons	
<b>Totals</b>		<b>1.064</b>	<b>4,640</b>	

**B. Waste Inventory Summary**

*Table 3. Maximum Inventory of Wastes Ever On Site.*

Item	Quantity (indicate cubic yards or tons)
Maximum inventory of waste in landfill units (total from Table 1)	87,301,156 <input checked="" type="checkbox"/> cubic yards or <input type="checkbox"/> tons
Maximum inventory of waste in storage or processing areas or operations (total from Table 2)	0 <input checked="" type="checkbox"/> cubic yards or <input type="checkbox"/> tons <i>Waste in storage or processing units will either be disposed in the landfill or transported to an authorized facility.</i>
Total Maximum Inventory of Wastes ever on site over the active life of the MSW facility (sum of totals from Tables 1 and 2)	87,301,156 <input checked="" type="checkbox"/> cubic yards or <input type="checkbox"/> tons

**Closure Plan for Type I Landfill Unit and Facility**

Facility Name: Edinburg Regional Disposal Facility  
 Permit No: MSW-956C  
 November 2017

Revision No.: 0  
 Date: July 2017, Revised:

**C. Drawings Showing Details of the Waste Management Units at Closure**

*Table 4. Location of the Drawings showing Details of the Waste Management Units at Closure (outlines, dimensions, maximum elevations of waste and final cover of landfill units, and waste storage or processing areas or operations at closure of the facility).*

Drawing Location in the SDP	Drawing Figure Number	Drawing Title	Waste Management Units Details Shown
Part III, Attachment 3	III3-1	Facility Layout Plan	e.g., outline, waste footprint, and dimensions of the landfill unit
Part III, Attachment 7	III7-1	Final Contour Map	e.g., maximum elevations of waste and final cover of the landfill unit
Part III, Attachment 1	III1-2	Schematic View of Various Waste Disposal, Processing, and Storage Areas	e.g., outlines and dimensions of the storage and processing area(s)

**III. Description of the Final Cover System Design**

**A. Types and Descriptions of the Final Cover Systems**

*Table 5. Types and Descriptions of the Final Cover Systems Permitted or Proposed for Closure of the Landfill Units.*

Landfill Unit Name or Descriptor	Type of Final Cover System	Final Cover System Components Description	Other Information (Enter other information as applicable)
	Conventional Composite	24-inch erosion layer with upper 6 inches capable of supporting vegetation, double-side geocomposite, 40-mil LLDPE, 18-inch compacted clay 1x10 <sup>-5</sup> cm/s	<i>Three final cover system options are provided for closure.</i>
	Alternative Composite	24-inch erosion layer with upper 6 inches capable of supporting vegetation, double-side geocomposite, 40-mil LLDPE, geosynthetic clay liner	
	Alternative Synthetic Grass	HDPE synthetic grass, sand infill, geotextile, 50-mil LLDPE Super Gripnet® geomembrane	

**Closure Plan for Type I Landfill Unit and Facility**

Facility Name: Edinburg Regional Disposal Facility  
 Permit No: MSW-956C  
 November 2017

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 Date: July 2017, Revised:

**B. Design Details**

*Table 6. Design Details of the Final Cover Top and Side Slopes for the Landfill Units.*

Landfill Unit Name or Descriptor	Maximum Final Elevation of Waste (feet above mean sea level [ft-msl])	Maximum Elevation of Top of Final Cover (ft-msl)	Minimum Grade of the Final Cover Top Slope (%)	Maximum Grade of the Final Cover Side Slope (%)	Other Information (enter other information as applicable, e.g. above-grade Class 1 Cell Dikes)
Conventional Composite Option	394.5	398.0	5	25	<i>Three final cover system options are provided for closure. Final cover grades are not to exceed those in Figure III7-1, Final Contour Map</i>
Alternative Composite Option	396.0	398.0	5	25	
Alternative Synthetic Grass Option	398.0	398.0	5	25	

**C. Final Cover Drainage Features**

Storm water drainage and erosion and sediment control features incorporated on the final cover of the landfill units to protect the integrity and effectiveness of the final cover system include *(please list and describe the drainage features to be installed on the final cover at or prior to closure for each landfill unit, or list the drainage features and provide cross references on the location(s) of the descriptive and details (drawing) information in other parts of the SDP):*

Part III2, Surface Water Drainage Report contains details on drainage features to be installed on the final cover prior to closure for each landfill unit which includes add-on berms and downchutes.

Figure III2-2 Post-Development Drainage Plan

Figure III2-3 Drainage Control Details I – Channels and Berms

Figure III2-4 Drainage Control Details II – Stormwater Downchute Details and Crossings

## Closure Plan for Type I Landfill Unit and Facility

Facility Name: Edinburg Regional Disposal Facility

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### D. Final Cover Vegetation or Other Ground Cover Material

The final cover will be seeded and/or sodded with native plants immediately following the application of the final cover in order to minimize erosion. Other materials, including **mulch and geosynthetic erosion control products**, may be incorporated over the final cover soil surface to ensure sufficient coverage of the ground surface to minimize erosion. The estimated percent ground cover to minimize soil loss and maintain long-term erosional stability of the final cover top and side slopes is: **90%**. The minimum material specifications for other ground cover materials are summarized in the table below.

*For a landfill with water balance final cover design, the percentage vegetation cover (excluding other ground cover types) will not be less than that assumed in the water balance final cover model.*

*Table 7. Minimum Specification for Ground Cover Materials Other Than Vegetation, if Applicable.*

Other Ground Cover Material	Maximum Particle Size (inches)	Minimum Particle Size (inches)	Material Placement Method	Thickness of Layer (inches)	Percentage Coverage (%)	Other (specify)
Mulch	Varies	Varies	Spread	Varies	Varies	
Geosynthetic Erosion Control Products	NA	NA	Install	Varies	Varies	

### E. Final Contour Map

Figure **III7-1**, a facility final contour map is attached. The map shows the final contours of the landfill units and the entire facility at closure.

Figures **III7-3A** and **III7-3E** showing the cross-sections of the landfill units at closure are also provided.

The facility final contour and cross-section maps/drawings depict the following information:

- (1) Final constructed contours of the landfill at closure.
- (2) Top slopes and side slopes of the landfill units.
- (3) Surface drainage features.
- (4) 100-year floodplain, as applicable.
- (5) Constructed features providing protection of/from the 100-year floodplain.
- (6) Other (specify):  
N/A

**Closure Plan for Type I Landfill Unit and Facility**

Facility Name: Edinburg Regional Disposal Facility  
 Permit No: MSW-956C  
 November 2017

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 Date: July 2017, Revised:

**IV. Description of the Final Cover System Installation Procedure**

**A. Mode of Installation**

*Table 8. Mode of Final Cover Installation on the Landfill Units.*

Landfill Unit Name or Descriptor	Largest Area of Unit Ever Requiring Final Cover (Acres)	Check this Column if Final Cover will be Placed in Installments as Permitted Elevation is Reached	Check this Column if Final Cover will be Placed when Entire Unit Area Reaches Permitted Elevation	Final Cover Installation Status
	159.1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yet to be installed
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	

**B. Installation Drawings for Final Cover and Drainage Features**

The following attached plan and cross-section drawings show the final cover design details, the largest area requiring final cover, details of the sequence of installation of the final cover system, and all drainage features.

*Table 9. List of Attached Installation Drawings for Final Cover and Drainage Features.*

Drawing No.	Drawing Title	Description of Information Contained in Drawing
III7-1	Final Contour Map	Plan drawing of final fill and drainage features
III7-2	Fill Cross-Sections	Fill Cross Section Location Map including profiles
III7-3	Final Cover Details	Details of final cover components and drainage features
III7-4	Maximum Closure Area	Area of maximum closure from sequence of site development in Part II

## Closure Plan for Type I Landfill Unit and Facility

Facility Name: Edinburg Regional Disposal Facility  
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November 2017

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Date: July 2017, Revised:

### C. Final Cover Quality Control Plan

A final cover quality control plan (FCQCP), Attachment **III7D**, is attached. The FCQCP describes the final cover system design, construction, and evaluation protocol and processes, including the personnel, materials, methods, sampling and testing standards, procedures, and practices to be used in procuring, handling, installing, and evaluating all elements of the final cover system. It establishes the material requirements; personnel qualifications and roles; installation requirements; quality control and quality assurance monitoring, testing, documentation, and reporting programs to be used during construction of each component of the final cover system to assure and to verify that the final cover system is constructed as designed and in accordance with applicable rules and technical standards.

### D. Documentation and Reporting of Final Cover System Construction and Testing

The professional of record will document all aspects and stages of the final cover installation, including materials used, equipment and construction methods, and the type and rate of sampling and quality control testing performed. Following completion of construction of the final cover, the site operator/permittee will submit to the TCEQ executive director, a Final Cover System Evaluation Report (FCSER) for each landfill unit.

## V. Closure Activities and Completion Schedules for Each Landfill Unit and for the Final Facility Closure

### A. Closure of a Landfill Unit

The following activities will be conducted to satisfy the closure criteria for a landfill unit:

#### (1) Closure Notification to the TCEQ Executive Director:

The site operator will inform the executive director of the TCEQ, in writing, of the intent to close the unit no later than 45 days prior to the initiation of closure activities and place this notice of intent in the operating record.

#### (2) Stoppage of Waste Acceptance and Commencement of Other Closure Activities for the Unit:

The site operator will stop accepting waste upon receiving the known final receipt of waste. The site operator will ensure that the permitted top elevations of the in-place waste, as depicted in/derived from the unit's final contour map approved by the TCEQ executive director, are not exceeded at any section or part of the landfill unit. The site operator will begin closure activities for the unit no later than:

- Thirty days after the date on which the unit receives the known final receipt of wastes; or

## Closure Plan for Type I Landfill Unit and Facility

Facility Name: Edinburg Regional Disposal Facility

Revision No.: 0

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Date: July 2017, Revised:

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- One year after the most recent receipt of wastes if the unit has remaining capacity and there is a reasonable likelihood that the unit will receive additional wastes.

### **(3) Request for Extension Beyond the 1-Year Deadline for Commencing Closure Activities for a Unit:**

The site operator may submit a written request to the executive director of the TCEQ for review and approval for an extension beyond the one-year deadline for the initiation of closure. The request will include the following:

- (a) All applicable documentation necessary to demonstrate that the unit has the capacity to receive additional waste; and
- (b) All documentation necessary to demonstrate that the site operator has taken and will continue to take all steps necessary to prevent threats to human health and the environment from the MSW landfill unit.

### **(4) Construction of Final Cover:**

The site operator will construct the permitted final cover over the waste mass utilizing methods, procedures, and specifications described in the FCQCP. The final constructed contours, elevations, and slopes of the installed final cover will match the permitted final cover contours, elevations, and slopes shown in closure drawings contained in this closure plan.

### **(5) Construction of Drainage Features:**

The site operator will construct the drainage structures shown in drawings referenced or contained in this closure plan or in the facility surface water drainage report.

### **(6) Completion of Outstanding or Replacement of Damaged Groundwater or Landfill Gas Monitoring Components:**

The site operator will complete installation of any outstanding or replacement of any damaged groundwater or landfill gas monitoring system components and landfill gas control systems as needed to maintain current and effective groundwater or landfill gas monitoring and control systems.

### **(7) Submittal of Final Cover System Evaluation Report (FCSER) to the TCEQ Executive Director:**

Following completion of construction of the final cover for the subject landfill unit, the site operator will submit to the TCEQ executive director for review and acceptance, a FCSE for the unit.

## Closure Plan for Type I Landfill Unit and Facility

Facility Name: Edinburg Regional Disposal Facility  
Permit No: MSW-956C  
November 2017

Revision No.: 0  
Date: July 2017, Revised:

### **(8) Completion of Closure Activities for the Landfill Unit:**

The site operator will complete closure activities for the unit within 180 days following the start of closure activities, unless the executive director of the TCEQ grants an extension as described in Item V.A.8(a) below.

#### **(a) Request for Extension of the Completion of Closure Activities for the Landfill Unit:**

The site operator may submit a written request for an extension for the completion of closure activities to the TCEQ for review and approval. The extension request will include:

- All applicable documentation necessary to demonstrate that closure will, of necessity, take longer than 180 days; and
- All applicable documentation necessary to document that all steps have been taken and will continue to be taken to prevent threats to human health and the environment from the unclosed MSW landfill unit.

### **(9) Submittal of Engineer's Certification of Closure to the TCEQ Executive Director and Request of Closure Inspection to TCEQ Regional Office:**

Following completion of all closure activities for the landfill unit, the site operator will submit:

#### **(a) Closure Inspection**

A written request to the local TCEQ regional office for a closure inspection of the unit.

#### **(b) Closure Certification**

A certification, signed by an independent licensed professional engineer, to the executive director of the TCEQ for review and approval verifying that closure has been completed in accordance with this closure plan. The site operator will submit the certification via registered mail, and the submittal will contain all applicable documentation necessary for certification of closure of the unit, including:

- A final cover system evaluation report (FCSER) documenting the installation of the final cover. The FCSER may be submitted as a separate document for review and approval following the completion of the final cover installation. In that case, the certification of closure will be submitted subsequently;
- A final contour map as described under Section III.E that includes the relevant unit; and
- Copy of the letter to the TCEQ regional office requesting a closure inspection of the relevant unit.

**Closure Plan for Type I Landfill Unit and Facility**

Facility Name: Edinburg Regional Disposal Facility  
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November 2017

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Date: July 2017, Revised:

**(10) TCEQ’s Acknowledgement of Termination of Operation and Closure of a Unit:**

Upon receipt, the TCEQ executive director will review the closure documents for completeness and accuracy; and following receipt of the closure inspection report from the agency’s regional office verifying proper closure of the MSW landfill unit according to this closure plan, the executive director will, in writing, acknowledge the termination of operation and closure of the unit and deem it properly closed. Thereafter, the site operator will comply with the post-closure care requirements described in the post-closure care plan for the unit.

**(11) Deed Recordation for Disposed Regulated Asbestos Containing Materials (RACM):**

Upon closure of the unit that accepted RACM, the site operator will place a specific notation that the unit accepted RACM in the deed records for the facility with a diagram identifying the RACM disposal areas. Concurrently, the site operator will submit to the TCEQ executive director, a notice of the deed recordation and a copy of the diagram identifying the asbestos disposal areas.

**(12) Placement of all Closure Documentation in the Site Operating Record:**

Once approved, the closure certification and all other documentation of closure will be placed in the site operating record.

**(13) Closure Schedule for the Landfill Unit:**

A closure schedule *for Unit Closure Implementation is provided in Closure Plan Report Text*. The schedule shows all the closure activities listed within Section V.A and the timelines for commencing and completing each activity. Also, the schedule shows that closure activities for the landfill unit will be completed within 180 days following the initiation of closure activities as required, unless an extension is granted by the TCEQ executive director.

**(14) Other: (enter as applicable).**

## Closure Plan for Type I Landfill Unit and Facility

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November 2017

### B. Closure of the Waste Storage or Processing Units or Operations

Closure of the waste storage or processing units or operations authorized under this permit will include removal of all waste, waste residues, and any recovered materials. The facility units and operations will either be dismantled and removed off-site or decontaminated. The site operator will dispose at the landfill or evacuate all materials (including feedstock, in process, and processed) to an authorized facility and disinfect all leachate handling units, tipping areas, processing areas, and post-processing areas. If there is evidence of a release from a unit or operation, the site operator will conduct an investigation, as approved by the TCEQ executive director, into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

### C. Final Closure of the Facility

In addition to the closure activities listed in Section V.A above for closing a landfill unit, the site operator will conduct the following activities for the closure of the entire facility:

#### (1) Publish Final Closure Notice and Place the closure Plan in a Public Place:

No later than 90 days prior to the initiation of the final facility closure, the site operator will:

##### (a) Publication of Notice:

The site operator will publish notice in the newspaper(s) of largest circulation in the vicinity of the facility to inform the public of the final closure of the facility. This notice will include:

- The name of the facility;
- The address, and physical location of the facility;
- The facility's permit number; and
- The last date of intended receipt of waste.

##### (b) Place Copies of the Closure Plan in a Public Place:

The site operator will also make available an adequate number of copies of the approved final closure and post-closure plans for public access and review at the Edinburg City Hall, 415 West University Drive, Edinburg, Texas 78539 (state public place within the area, including address, where the plan will be available for public access and review).

#### (2) Submit Written Notice of "Intent to Close the Facility" to the TCEQ Executive Director:

The site operator will provide written notification to the TCEQ executive director of the intent to close the facility. This notice will be provided to the executive director no later than 90 days prior to the initiation of the final facility closure, and thereafter be placed in the site operating record.

## Closure Plan for Type I Landfill Unit and Facility

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### **(3) Post Signs and Install Barriers:**

Upon notifying the executive director of the intent to close the facility and no later than 90 days prior to the initiation of final facility closure, the site operator will:

#### **(a) Post Final Closure Signs:**

The site operator will post a minimum of one sign at the main entrance and all other frequently used points of access for the facility notifying all persons who may utilize the facility of the date of closing for the entire facility and the prohibition against further receipt of waste materials after the stated date.

#### **(b) Install Barriers:**

Also, the site/operator will install suitable barriers at all gates or access points to adequately prevent the unauthorized dumping of solid waste at the closed facility.

### **(4) Filing of "Affidavit to the Public" and Performance of the Final Deed Recording:**

Upon closure of all the landfill units or upon final closure of the facility, the site operator will:

#### **(a) File Affidavit**

File with the county deed records an "Affidavit to the Public" in a form provided by the TCEQ executive director that includes an updated metes and bounds description of the extent of the disposal areas at the facility and the restrictions to future use of the land in accordance with applicable provisions under 30 TAC Chapter 330, Subchapter T.

#### **(b) Record a Notation on the Deed**

Record a certified notation on the deed to the facility property, or on some other instrument that is normally examined during title search, that will in perpetuity notify any potential purchaser of the property that the land has been used as a landfill facility and use of the land is restricted according to the provisions under 30 TAC Chapter 330, Subchapter T.

#### **(c) Place Documents in the Operating Record**

Place a copy of the "Affidavit to the Public" and a copy of the modified deed in the site operating record.

## Closure Plan for Type I Landfill Unit and Facility

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November 2017

### **(5) Submittal of a Copy of the "Affidavit to the Public" and the "Modified Deed" to the TCEQ Executive Director:**

Within ten days after completion of final closure activities of the facility, the site operator will submit the following to the TCEQ executive director by registered mail:

- (a) A certified copy of the "Affidavit to the Public";
- (b) A certified copy of the modified deed to the facility property; and
- (c) A certification, signed by an independent licensed professional engineer, verifying that final facility closure has been completed in accordance with the approved closure plan. The submittal will contain all applicable documentation necessary for certification of final facility closure, including:
  - Final Cover System Evaluation Report (FCSER) documenting the installation of the final cover. The FCSER may be submitted earlier as a separate document for review and approval following the completion of the final cover installation. In that case, the certification of closure will be submitted subsequently;
  - A final contour map as described under Item III.G above;
  - Copy of a letter to the TCEQ regional office requesting a final closure inspection of the facility; and
  - Copies of documents verifying newspaper publication of the notice of the final facility closure.

### **(6) Other**

Additional items relating to the schedule for final facility closure, and additional closure activities specific to the final closure of this facility include:

## Closure Plan for Type I Landfill Unit and Facility

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Date: July 2017, Revised:

November 2017

### **(7) TCEQ's Acceptance of Termination of Operation and Closure of a Landfill Facility:**

Following the TCEQ executive director's receipt and completion of the review of the professional engineer's certification of the completion of facility closure and the final closure documents, and receipt of the inspection report from the agency's regional office verifying proper closure of the facility according to this closure plan, the executive director will, in writing, accept the termination of operation and closure of the facility and deem it properly closed. Thereafter, the site operator will comply with the post closure care requirements described in the post closure plan for the facility.

### **(8) Final Closure Schedule for the Facility:**

The attached Closure Plan, Final Closure Schedule, provides the closure schedule for the final facility closure. It incorporates the schedule for closure of a unit as discussed in Section V.A and also shows the commencement and completion timelines for the final closure activities listed within this Section.

## **VI. Summary of Attachments**

### **A. Drawings and Maps**

The following Drawings and Maps are attached as part of this plan.

- Figure III7-1, Final Contour Map.
- Figures III7-2, Cross-Section Drawings of the Landfill Units at Closure.
- Figures III7-3, Final Cover Details.
- Other Drawings/Maps: Figure III7-4 Maximum Closure Area

### **B. Documents**

- Attachment III7A, Alternative Composite Final Cover Demonstration.
- Attachment III7B, Alternative Synthetic Grass Final Cover Demonstration.
- Attachment III7C, Form TCEQ-20720
- Attachment III7D, Final Cover Quality Control Plan (FCQCP).

### **C. Additional Items Attached (enter as applicable)**

**Closure Plan for Type I Landfill Unit and Facility**

Facility Name: Edinburg Regional Disposal Facility  
Permit No: MSW-956C  
November 2017

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**VII. Professional Engineer's Statement, Seal, and Signature**

Name: Chad E. Ireland Title: Senior Project Geological Engineer

Date: November 7, 2017

Company Name: Golder Associated Inc. Firm Registration Number: F-2578

Professional Engineer's Seal



  
Signature



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 7, Appendix D-1

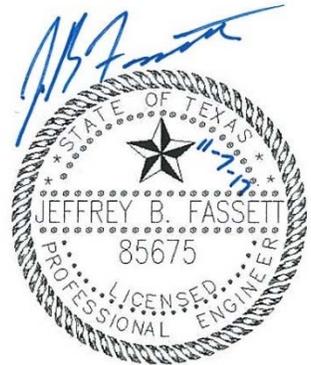
# FINAL COVER QUALITY CONTROL PLAN

## CONVENTIONAL COMPOSITE AND ALTERNATIVE COMPOSITE FINAL COVER

Edinburg Regional Disposal Facility  
Edinburg, Hidalgo County, Texas  
TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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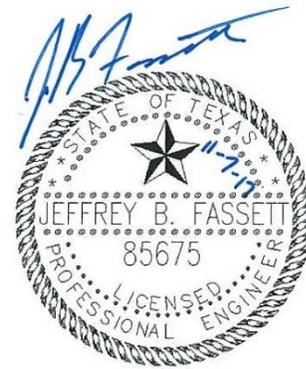
July 2017  
Revised: November 2017

Project No. 1401491



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## 1.0 PURPOSE

### 1.1 Purpose

This Final Cover Quality Control Plan (FCQCP), is prepared under the direction of a licensed professional engineer, and it is the basis for the type and rate of quality control testing performance and reported in the final cover system evaluation report (FCSER) as required in 30 TAC §330.457. The plan provides operating personnel adequate procedural guidance for assuring continuous compliance with applicable rules and technical standards. The plan specifies construction methods employing good engineering practices for installation and testing of components of the conventional composite and alternative composite final cover system including infiltration layer, geosynthetic clay liner (GCL), geomembrane (GM), drainage layer, and erosion layer.

### 1.2 Final Cover Quality Control Testing Procedures

The liner quality control testing procedures, including sampling frequency, are provided in this FCQCP. All field sampling and testing, both during construction and after completion, shall be performed by a person acting in compliance with the provisions of the Texas Engineering Practice Act and other applicable state laws and regulations. The professional of record (POR) who signs the FCSER or his representative should be on site during all liner construction. Quality control of construction and quality assurance of sampling and testing procedures should follow the latest technical guidelines of the TCEQ.

## 2.0 FINAL COVER SYSTEM COMPONENTS

The final cover system options at the facility includes a conventional composite final cover system meeting the requirements of §330.457(a)(1) and an alternative composite final cover system meeting the requirements of §330.457(d). This FCQCP applies to both the conventional composite final cover system as well as an alternative composite final cover system with a GCL component for the infiltration layer. FCQCPs for other alternative final cover systems are presented separately.

The conventional composite final cover consist of (from top to bottom):

- Erosion layer consisting of 24 inches of protective soil cover, of which the uppermost 6 inches will be capable of supporting native vegetation.
- Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer.
- 40-mil linear low-density polyethylene (LLDPE) textured geomembrane that has a permeability less than or equal to the permeability of the bottom liner system.
- 18-inch thick compacted clay rich earthen material with a hydraulic conductivity of  $1 \times 10^{-5}$  cm/sec or less (infiltration layer).

The alternative composite final cover will consist of (from top to bottom):

- Erosion layer consisting of 24 inches of protective soil cover, of which the uppermost 6 inches will be capable of supporting native vegetation.
- Double-sided geocomposite (geotextile/geonet/geotextile) drainage layer.
- 40-mil LLDPE textured geomembrane that has a permeability less than or equal to the permeability of the bottom liner system.
- Reinforced GCL (infiltration layer).

The construction and testing requirements for the conventional composite final cover system infiltration layer are described in §2.0, Final Cover System Components of this FCQCP. The construction and testing requirements of the GCL infiltration layer in the alternative composite final cover system is described in §3.0, Cohesive Soil Cover of this FCQCP.

### 3.0 COHESIVE SOIL COVER (INFILTRATION LAYER)

This section outlines generally acceptable construction practices and specifications and the minimum quality control testing requirements for cohesive soil covers, serving as the infiltration layer in the final cover system.

#### 3.1 Pre-construction Material Evaluation

The first step in constructing a cohesive soil cover is to pre-qualify the soil materials that are selected for final cover construction. Cohesive soil cover material may be obtained from in situ soil strata that will be excavated as the final cover is constructed or from a select borrow source. Representative samples from either source shall be subject to the minimum pre-construction testing program shown in Table III7D-1-1, Cohesive Soil Cover Materials Pre-construction Testing Schedule. Each soil type shall undergo the series of tests listed in Table III7D-1-1.

**Table III7D-1-1: Cohesive Soil Cover Materials Pre-construction Testing Schedule**

TEST	METHOD USED	FREQUENCY <sup>(1)</sup>
Soil Classification	ASTM D2487	1 per soil type
Particle-Size Analysis	ASTM D422 or D1140	1 per soil type
Atterberg Limits	ASTM D4318	1 per soil type
Hydraulic Conductivity <sup>(2)</sup>	ASTM D5084 <sup>(3)</sup>	1 per soil type
Conventional Proctor Test	ASTM D698	1 per soil type
Moisture Content	ASTM D2216	1 per soil type

**NOTES:**

- (1) If either the liquid limit (LL) or plastic limit (PI) varies by more than 10 points from other samples, the soil is considered a different soil type.
- (2) Conduct this test on a remolded sample that is compacted at or less than 95% of the maximum dry density and at the optimum moisture content as determined from the conventional Proctor test or compacted at or less than 90% for modified Proctor test at one percent dry of the optimum. If pre-construction samples are compacted at higher

- or lower densities and/or respective moisture contents, then these values will govern for field control. Pre-construction tests should represent the "worst-case" condition in the field concerning hydraulic conductivity results.
- (3) Testing procedures in Appendix VII of the US Army Corps of Engineers Manual EM 1110-2-1906, November 30, 1970, Laboratory Soils Testing, may be used as an alternative method. Permeability tests will be conducted using tap water or 0.05N calcium sulfate solution as the permeant fluid. Distilled or deionized water is not acceptable.

Where soil types vary substantially and are not segregated, representative blends of those soil types anticipated to be utilized for cohesive soil cover construction should also be sampled and tested. The material tested shall comply with the following minimum material specifications:

■ Plasticity Index	≥ 15
■ Liquid Limit	≥ 30
■ Percent Passing No. 200 Sieve	≥ 30
■ Particle Size	≤ 1 inch
■ Hydraulic Conductivity	≤ 1 x 10 <sup>-5</sup> cm/sec

The Proctor moisture-density curves shall be developed for each type of soil determined suitable as cohesive soil cover material and shall be used during the construction phase as a performance reference for compaction and moisture control.

The POR should consider the potential adverse effects on and/or inconsistencies of results due to laboratory drying procedures, as some materials may exhibit variation in results for Proctor and Atterberg limits tests. Samples should not be oven-dried nor dried back more than 2 to 3 percent below the lowest anticipated moisture content needed to develop the Proctor moisture-density relationship. The zero air voids line shall be computed and included along with the Proctor curves, indicating the specific gravity value used.

Pre-construction samples to be run for hydraulic conductivity testing shall be molded at or less than the optimum moisture content and at or less than 95 percent of the maximum dry density according to the conventional Proctor test (ASTM D698). These points should represent reasonable worst-case conditions for hydraulic conductivity results on appropriately compacted soils. If higher moisture contents or dry densities are used for the hydraulic conductivity tests, then the higher values will be used for field control during placement. However, if lower moisture or density values are used and confirmed to achieve acceptable hydraulic conductivities, field control will still be based on the minimum compaction requirements in §3.2.4, Minimum Compaction Requirements of this FCQCP. .

A minimum of one series of pre-construction tests will be performed on each soil type and, a general rule for every 15,000 to 20,000 cubic yards (CY) of soil to be used in cohesive soil cover construction, unless soil types are limited and easily distinguished. As soil is usually made available subsequent to excavation during final cover construction, additional pre-construction samples should be taken and tests performed when soils vary or as soon as the initial pre-construction test results appear inappropriate or questionable.

If and when the same borrow source is utilized for the soil supply of more than one final cover area, and the soil type is the same, results from previous tests may be used to supplement the pre-construction data.

## **3.2 Soil Cover Construction Specifications and Practices**

The cohesive soil cover shall be constructed in accordance with the requirements included in this section. Also, certain construction practices shall be utilized as described herein when appropriate.

### **3.2.1 Working Surface Preparation**

Subgrade preparation prior to receiving final cover will include compacting the near surface waste or intermediate cover to prepare the working surface. Depressions in the surface where ponded water is observed will be prepared by removing the water and filling the depression with additional intermediate cover to maintain an adequate slope.

Stability of the working surface prior to placement of the final cover shall be determined by the POR by visual inspection to confirm that deflection and pumping characteristics are minimized and the strength of the surface material is adequate. The lines and grades shall be determined by survey methods prior to subsequent final cohesive soil cover construction.

The prepared subgrade shall be tied into the first cohesive soil cover lift in a manner deemed suitable by the POR such that the integrity of the first lift will be maintained.

### **3.2.2 Work Area Selection and Sizing**

Work areas for cohesive soil cover construction should be selected, sized, and sequenced so that work on each lift can begin and be completed in the same day. The area worked at any one time should be of such size that placement, processing, and compaction will be uniform, with minimal variation caused by weather conditions. It is critical that completed lifts be tested and covered with the next loose lift before that completed lift dries out in the sun or becomes damaged by heavy precipitation. Furthermore, the selection of size and shape of work areas shall be consistent, so that uniform construction techniques and equipment can be selected. Adequate numbers of quality control personnel will be provided to suit the pace of construction so proper monitoring and documentation is performed.

### **3.2.3 Lift Placement and Processing**

Reduction of soil clods, uniform moisture distribution, and consistent placement thickness are key elements to achieving uniform compaction of cohesive soil covers. Cohesive soil cover material shall be placed in loose lifts, generally not exceeding 8 inches after spreading and leveling and/or processing, with the expectation that the finished lift, following compaction, will be about 6 inches or less. In no case will the

loose lift thickness, after spreading and leveling, be greater than the length of the compactor feet. The intent of limiting the loose thickness is to achieve good interlift bonding and to minimize bridging or layering effects.

The loose lift of soil shall be mechanically processed, either in-place or in a separate processing area, to break down the original soil structure and to reduce clod size. Additional processing, if necessary, will be used to blend variable soil types within the loose lift and incorporate additional water. The goal of processing is to yield a relatively uniform mass of soil that is devoid of original structure that may contribute to excess hydraulic conductivity. Processing may be achieved by discing, grading, compacting, or pulverizing. Pneumatic-tired or tracked equipment will not generally be acceptable to provide processing action, although this equipment may be used to pull the other acceptable implements.

Moisture adjustment may be required, particularly during dry seasons, and reasonable practices shall be used to distribute added water uniformly within the lift. Care shall be taken to prevent over-watering and ponding of water within the loose lift, as this excess water is difficult to redistribute. Drying back of overly wet soils during processing can result in clods having dry, crusting surfaces, which may not bond together adequately. If such drying is allowed, then additional effort will be necessary to assure even moisture distribution and hydration. Hydration times shall be evaluated and determined if acceptable by the POR.

### **3.2.4 Minimum Compaction Requirements**

Processed loose lifts shall be leveled prior to compaction to provide uniform compaction effort over the lift. Each lift shall be compacted to the moisture and density requirements established for the project and as set forth in the provisions of this FCQCP. Lifts shall be compacted to at least 95 percent of the maximum dry density with a corresponding moisture content at or up to 5 percent above optimum determined by conventional Proctor test results (ASTM D698) conducted on similar representative material. The above criteria shall be utilized, unless pre-construction hydraulic conductivity tests were performed at higher or lower densities or moisture contents, in which case these density and moisture values will be used as field compaction minimums. The soil liner density must be expressed as a percentage of the maximum dry density and at the corresponding optimum moisture content as discussed in this section.

In the event that subsequent laboratory testing of samples from an area of constructed cohesive soil cover indicate an alternate moisture density curve is appropriate for the soil type, the CQA monitor will switch to the appropriate curve as necessary. It is recognized that laboratory test results become available often several days after construction of an area of cohesive soil cover. If the laboratory testing data indicates that the area constructed using the incorrect moisture-density curve meets the permeability requirements (i.e., less than or equal to  $1 \times 10^{-5}$  cm/sec), the area will be considered acceptable as cohesive soil cover.

Cohesive soil covers shall not be compacted with a bulldozer or any track-mobilized equipment unless it is used to pull a footed roller; however, this practice is not encouraged. All cohesive soil covers shall be compacted with a pad-footed or prong-footed roller only. Bulldozers, pneumatic rollers or scrapers, and flat-wheeled rollers will not be permitted for compaction.

Construction survey control should be conducted routinely during lift placement to verify that loose and finished lifts are of the proper thickness to ensure uniform compaction.

### **3.2.5 Lift Bonding and Cohesive Soil Cover Tie-in**

Interlift bonding shall be accomplished prior to placing the subsequent loose lift. Compactors shall be of sufficient weight and foot length to penetrate the current lift when loose and provide bonding to the previous lift.

When lifts of the cohesive soil cover are not constructed continuously, a vertical construction joint may occur. To remove the vertical construction joint(s), the edge of the adjoining section shall be cut back or flattened to permit offsetting of the tie-in for subsequent lifts. For each 6-inch lift, the edge should be cut back at least 2.5 feet or graded to a maximum slope of 5H:1V, and then the corresponding adjoining lift should be placed against the existing finished lift. The new loose lift and at least 2 feet of the adjoining existing lift will be processed together, and then recompacted, so that the existing cohesive soil cover edge is tied to new construction without superimposed vertical construction joints. This tie-in procedure shall be repeated lift-by-lift until all corresponding adjacent lifts are constructed to the required elevation. The cut back edge of the existing cohesive soil cover may be done all at once or one lift at a time.

## **3.3 Construction Monitoring and Conformance Testing**

Quality assurance of recompacted cohesive soil covers shall consist of monitoring the work as cohesive soil cover construction proceeds and laboratory and field testing to assure that material conformance and construction performance specifications are achieved.

### **3.3.1 Monitoring and Observations**

Full-time quality assurance monitoring and testing will be performed during the course of cohesive soil cover construction. The work will be performed by a POR described in §1.2, Final Cover Quality Control Testing Procedures of this FCQCP or by a CQA monitor working under the general supervision of the POR. The CQA monitor will be on-site at all times when cover construction is ongoing, so that all relevant activities can be observed and documented. The POR will visit the site periodically as construction progress warrants. Such visits will be frequent enough so that the POR is fully knowledgeable of the construction methods and performance, so that the POR can determine that quality control monitoring and testing activities are adequate to meet the terms and intent of this FCQCP.

Visual observation shall include, but not be limited to, the following:

- Moisture content and distribution, particle size, and other physical properties of the soil during processing, placement, and compaction.
- Type and level of compaction effort, including roller type and weight, drum size, foot length and face area, and number of passes.
- Action of compaction equipment on soil surface (i.e., foot penetration, rolling, pumping, or shearing).
- Maximum clod size and breakdown of soil structure.
- Method of bonding lifts together and making cohesive soil cover tie-ins.
- Stones or other inclusions, which may damage overlying geosynthetic components or adversely affect compaction, lift bonding, and in-place testing/sampling.
- Areas where damage due to excess moisture, insufficient moisture, or freezing may have occurred.

### 3.3.2 Construction Testing

30 TAC §330.457(c)

During cohesive soil cover construction, the minimum testing and sampling program presented in Table III7D-1-2, Cohesive Soil Cover Construction Testing Schedule shall be conducted to determine that adequate compaction and material conformance are being achieved.

**Table III7D-1-2: Cohesive Soil Cover Construction Testing Schedule**

TEST	METHOD	MINIMUM FREQUENCY <sup>(2)(3)</sup>
Field Moisture/Density Test	ASTM D6938, D2937, or D1556	1 per 8,000 ft <sup>2</sup> , per 6-inch lift
Percent Finer Than No. 200 Sieve	ASTM D1140 or D422	1 per 100,000 ft <sup>2</sup> , per 6-inch lift
Atterberg Limits	ASTM D4318	1 per 100,000 ft <sup>2</sup> , per 6-inch lift
Hydraulic Conductivity <sup>(1)</sup>	ASTM D5084	1 per acre (evenly distributed through all lifts), per 6-inch lift

NOTES:

- (1) Testing shall be conducted on undisturbed samples. Testing procedures in Appendix VII of the US Army Corps of Engineers Manual EM 1110-2-1906, November 30, 1970, Laboratory Soils Testing, may be used as an alternative.
- (2) A voluntary increase in the number of any tests performed does not in turn require a commensurate increase in the other testing requirements to meet the above program.
- (3) A minimum of one of each of the designated tests must be conducted for each lift of cohesive soil cover regardless of surface area.

Typically, field moisture-density tests will be performed using a nuclear density gage (ASTM D6938). Other acceptable test methods include the Sand Cone Method (ASTM D1556) or Drive Cylinder Test (ASTM D2937). Questions concerning the accuracy of any single field moisture-density test shall be addressed by retesting in the same general location. Periodic checks using the various test methods may be performed

to verify the field moisture-density test results. Alternatively, field moisture-density checks may be performed using laboratory measurements of tube samples obtained adjacent to the field test locations.

Hydraulic conductivity tests will be performed on samples obtained with a thin-walled tube sampler. The percent finer than No. 200 sieve and Atterberg limits will be performed on the thin-walled tube sample or on a grab sample obtained adjacent to the thin-walled tube. These construction test samples will be obtained from the recently completed lift, taken one lift at a time, so that sample penetrations only go through one lift and do not penetrate from one lift into the next. Hydraulic conductivity samples will be sent to the geotechnical laboratory in the sampling tube, which will be properly sealed to preserve the moisture content and integrity of the sample.

### **3.3.3 Failure Repairs**

#### **3.3.3.1 Field Density Testing**

Sections of cohesive soil cover that do not pass either the density or moisture requirements in the field shall be reworked and retested until the section in question does pass. All field density results shall be reported in the Final Cover System Evaluation Report (FCSER), whether they indicate passing or failing values.

In the event of a failed moisture-density test, additional tests will be performed between the failed test and the nearest adjacent passing test locations. If those additional tests pass, then the area between the failed test and the additional passing tests will be reworked and retested until passing. If the additional tests fail, then additional tests will be performed halfway between the initial additional tests and the adjacent passing tests to further define the failing area. This procedure will be repeated until the failing area is defined, reworked, and retested with passing results.

#### **3.3.3.2 Laboratory Testing**

Sections of cohesive soil cover that do not pass hydraulic conductivity testing shall be reworked and retested until the section in question does pass. All hydraulic conductivity testing results shall be reported in the Final Cover System Evaluation Report (FCSER), whether they indicate passing or failing values.

In the event of a failed hydraulic conductivity test, additional tests will be performed between the failed test and the nearest adjacent passing test locations. If those additional tests pass, then the area between the failed test and the additional passing tests will be reworked and retested until passing. If the additional tests fail, then additional tests will be performed halfway between the initial additional tests and the adjacent passing tests to further define the failing area. This procedure will be repeated until the failing area is defined, reworked, and retested with passing results.

### **3.3.4 Cohesive Soil Cover Perforations**

When taking field densities and undisturbed samples, all holes dug or created in the cohesive soil cover for density probes or samples must be backfilled with bentonite or a bentonite-rich soil material. This backfill will be tamped in the hole to remove pockets of air or loose soil, and to assure a tight compact seal.

### **3.3.5 Cover Thickness Verification**

Cohesive soil cover thickness verification shall be determined by survey methods. The verification points for record purposes shall be on a grid not exceeding 10,000 square feet per grid. If the area under evaluation is less than 10,000 square feet, a minimum of two grid points is required for verification. The selected grid shall be the same for both beginning and finished elevations of the cohesive soil cover, so that minimum thicknesses can be calculated and verified.

### **3.3.6 Post-Construction Care of Cohesive Soil Cover**

The integrity of the cohesive soil cover shall be maintained by moistening to prevent the material from desiccating. Conversely, the cohesive soil cover shall be kept free of standing water. Damage caused by rain shall be repaired, and if the lift must be reworked, as determined by the POR, then appropriate retesting (including field moisture-density and permeability tests) shall be performed.

## **4.0 GEOSYNTHETIC CLAY LINER**

This section presents general procedures, quality control testing requirements, and installation procedures for the geosynthetic clay liner (GCL) used in the alternative composite final cover to replace the cohesive soil (infiltration) layer. The GCL approved for use at the site consists of sodium bentonite encapsulated between two geotextile layers, needle-punched or stitched-bonded together.

### **4.1 Pre-Installation Material Evaluation**

#### **4.1.1 Manufacturer's Quality Control Certificates**

Prior to the installation of the GCL, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. The manufacturer must provide documentation certifying the material was continuously inspected for broken needles, and is needle free. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in accordance with project-specific testing methods and subject to the minimum testing frequency shown in Table III7D-1-3, GCL OC Submittal Frequency & Material Specifications. The owner may require more frequent testing at his discretion.

The quality control testing may be performed in the manufacturing plant. The POR shall review the test results prior to accepting the GCL to ensure that the certified minimum properties meet the values presented in Table III7D-1-3, GCL QC Submittal Frequency & Material Specifications.

#### 4.1.2 Conformance Testing

In addition to the manufacturer’s quality control certificates, samples of rolls of GCL will be obtained for conformance testing. The samples shall be tested by an independent third party laboratory in accordance with Table III7D-1-4, GCL Conformance Test Schedule. The POR shall review the test results to ensure that they meet the values presented in Table III7D-1-3, GCL QC Submittal Frequency & Material Specifications.

The POR shall compare measured shear strength values to those used in the stability analyses included in Part III3B-2E, Final Cover System Stability. If the measured interface shear strength is less than the values used in the analyses, the stability of the final cover system shall be reassessed and revised calculations shall be included in the Final Cover System Evaluation Report (FCSER).

#### 4.1.3 Shipping and Unloading

In order to prevent premature hydration, the GCL rolls shall be shipped in plastic wrapping that shall remain intact until material installation. Rolls shall be labeled with the manufacturers name, product identification, roll and lot number, roll dimensions, weight and any other information to trace the quality assurance documentation. Upon delivery of the GCL, storage and handling procedures shall be documented. The rolls will be stacked, stored above ground, covered, and handled in accordance with ASTM D5888 or manufacturer’s recommendations. If any rolls is damaged during shipping, unloading or storage or if the outer portion becomes partially hydrated, the damaged portion shall be removed before the roll is deployed.

**Table III7D-1-3: GCL QC Submittal Frequency & Material Specifications**

<b>Bentonite</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Fluid Loss	max.	ml	18	ASTM D5891	1 per 50 tons or every truck or railcar
Free Swell	min.	ml	24	ASTM D5890	
<b>Geotextile</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Mass per Unit Area	—	g/cc	—	ASTM D5261	1 per 200,000 ft <sup>2</sup>
Tensile Properties:	—	lb	—	ASTM D4632	
<b>GCL Product</b>					
<b>Property</b>	<b>Qualifier</b>	<b>Unit</b>	<b>Value</b>	<b>Test Method<sup>(1)</sup></b>	<b>Frequency</b>
Bentonite Mass	min.	lb/ft <sup>2</sup>	0.8	ASTM D5993	1 per 40,000 ft <sup>2</sup>

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Bentonite Moisture Content	—	%	—	ASTM D5993	
Grab Tensile Strength	—	lb	—	ASTM D6768	1 per 200,000 ft <sup>2</sup>
Hydraulic Flux	max.	m <sup>3</sup> /m <sup>2</sup> -s	1 x 10 <sup>-8</sup>	ASTM D5887	1 per week for each production line <sup>(2)</sup>
Lap Joint Permeability	Max	cm/sec	1 x 10 <sup>-8</sup>	Flow Box or other suitable device	1 per material and lap type

Notes:

1. Updated methods may be implemented based on a review by the POR.
2. Report last 20 test values, ending on production date of supplied GCL.
3. For those properties that do not indicate a value, the GCL material must meet the manufacturer's minimum specification.

**Table III7D-1-4: GCL Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Bentonite Mass/Unit Area	ASTM D5993	Not less than 1 test per 100,000 ft <sup>2</sup>
Hydraulic Flux	ASTM D5887	
Direct Shear	ASTM D6243	1 test per GM/adjoining materials

Notes:

1. Updated methods may be implemented based on a review by the POR.

## 4.2 Installation Procedures

### 4.2.1 GCL Subgrade Preparation

Surfaces to be lined should be smooth and free of all rocks greater than 0.75-inch diameter (or as recommended by the manufacturer, if less than 0.75 inches), sharp/angular objects, sticks, roots, or debris of any kind. The surface should provide a firm, unyielding foundation for the GCL with no sudden, sharp, or abrupt changes or break in grade. The subgrade surface shall be prepared by rolling with a smooth-drum roller to minimize the roughness and press down protruding soil or rock particles prior to GCL deployment. Loose rocks and/or dry soil particles that could damage the GCL shall be removed. Excessive voids or dimples shall be filled with soil.

The GCL subgrade should be moisture conditioned prior to placing the GCL in final covers. Research has shown that the subgrades with water contents above 10%, or greater than the optimum water content, promotes hydration and osmotic swell in GCLs. These conditions result in GCLs that maintain their low hydraulic conductivities regardless of the amount cation exchange that occurs (Scalia and Benson 2011).

Although the subgrade shall be moist, standing water will not be allowed.

#### **4.2.2 GCL Deployment**

Equipment used to deploy GCL must not cause excessive rutting of the subgrade. Deployed GCL panels should contain no folds or excessive slack. Installation personnel must not smoke or wear damaging shoes on GCL. GCL should not be placed during excessive winds. Sand bags should be used to anchor deployed GCL when necessary. In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the GCL. If the POR or CQA monitor observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Generators, gasoline or solvent cans, tools, or supplies must not be stored directly on the GCL. GCL must be rolled into position, not drug across the subgrade. Deployed GCL must not be used as a work area without adequate protection such as a rub sheet.

Panels should be overlapped and seamed, as recommended by the manufacturer. End-to-end seams on sideslopes are not allowed. Care must be taken to assure the GCL is installed with the proper side up.

GCL deployment shall be limited to the amount that can be covered with the overlying geomembrane liner the same day. GCL deployment shall not be undertaken during precipitation or when there is an impending threat of precipitation. GCL deployed on 5H:IV or steeper slopes shall be rolled down the slopes, not cross slope.

Following deployment, the CQA monitor shall visually examine the entire surface of the GCL for even bentonite distribution, thin spots, or other panel defects. All defects will be recorded and repaired in accordance with this FCQCP. The QA/QC representative shall also verify the following:

- Adequately moist subgrade
- Proper overlap during deployment
- Seams between GCL panels are constructed per manufacturer's recommendations
- Defects are patched and overlapped properly
- The bentonite has not become excessively hydrated
- No stones, tools, cutting blades or other objects that could damage the GCL are present on the GCL.

Excessively hydrated GCL shall be removed and replaced. Geomembrane shall not be placed on excessively hydrated GCL.

GCL panels shall be given an identification code, mapped, and logged to record relevant installation information.

### 4.2.3 GCL Repairs

Torn or otherwise damaged geosynthetic facing must be patched with the same type of geosynthetic. The geosynthetic patch must extend at least 12 inches beyond the damaged area and must be heat bonded, or otherwise attached to the main GCL to avoid shifting during placement of overlying geosynthetics. If the GCL damage includes loss of bentonite, the patch must consist of full GCL extending at least 12 inches beyond the damaged area. Lapping procedures must be the same as specified for original laps of GCL panels.

### 4.2.4 GCL Protection

The overlying geosynthetics and soil layers shall be deployed in such a manner as to ensure that the GCL is not damaged. Textured geomembranes shall not be dragged across previously installed GCL. A smooth rubsheet shall be placed between the GCL and textured geomembrane to prevent damage. The rubsheet will be removed when the geomembrane is in position. Other methods may be employed at the POR's discretion.

To avoid local bentonite displacement, and the possible impact on the hydraulic performance of a GCL, the soil cover material should be placed over the geomembrane and geocomposite overlying the GCL as soon as practicable following completion of the geomembrane and drainage system construction.

## 5.0 GEOMEMBRANE LINER

This section presents general procedures, quality control testing requirements, and construction specifications for geomembrane liner construction. Both the conventional composite final cover system and the alternative composite final cover system will include the following components:

- 40-mil, textured LLDPE geomembrane;
- A geocomposite drainage layer composed of a geonet and filter geotextiles heat-bonded to both sides; and
- 18-inch protective cover soil. The upper 6 inches is an erosion control layer and must be capable of sustaining native plant growth.

### 5.1 Pre-installation Material Evaluation

#### 5.1.1 Manufacturer's Quality Control Certificates

Prior to installing any geomembrane, the manufacturer or installer shall provide the POR with quality control certificates signed by a responsible party employed by the manufacturer. Each quality control certificate shall include roll identification numbers, testing procedures, and results of quality control tests. The quality control tests shall be performed in the manufacturing plant using the test methods and frequencies listed in the most recent version of the Geosynthetic Research Institute (GRI) test method GM17, "Test Methods,

Test Properties and Testing Frequency for Linear Low Density Polyethylene (LLDPE) Smooth and Textured Geomembranes,” included in Attachment 1. The owner may require more frequent testing at his/her discretion.

The POR shall review the test results prior to accepting the geomembrane to assure that the certified minimum properties meet the minimum values for geomembranes, as determined by the most recent GRI test method GM17.

The rolls delivered to the site shall be inventoried, recording the manufacturer's name and product identification, and the roll thickness, number and dimensions. Manufacturer's certificates should be cross-referenced to rolls delivered on-site.

Resumes of the installer's supervisor(s) or Master Seamer(s) shall be obtained to verify that adequate seaming experience will be utilized on the project. The installer's supervisor or Master Seamer shall have had experience totaling a minimum of 2,000,000 square feet of geomembrane installation.

Upon delivery of geosynthetic materials, storage and handling procedures shall also be documented. Rolls of geosynthetic materials shall be handled and stored in such a way as not to damage the material. As a general rule, rolls of geosynthetic materials should not be stacked more than four rolls high.

### 5.1.2 Conformance Testing

In addition to the manufacturer's quality control certificates, samples of the delivered rolls of geomembrane will be obtained either at the manufacturing facility or upon delivery to the site for conformance testing. The test samples shall be conformance tested by a third party laboratory in accordance with the testing schedule shown in Table III7D-1-5, Geomembrane Conformance Test Schedule.

**Table III7D-1-5: Geomembrane Conformance Test Schedule**

TEST	METHOD <sup>(1)</sup>	FREQUENCY
Thickness (laboratory measurement)	ASTM D5994 (Textured)	Not less than 1 test per 100,000 ft <sup>2</sup> with not less than 1 per resin lot
Density	ASTM D1505 or D792	
Carbon black content <sup>(5)</sup>	ASTM D4218	
Carbon black dispersion	ASTM D5596	
Tensile properties	ASTM D6693, Type IV	
Direct Shear <sup>(2)(3)(4)</sup>	ASTM D6243	1 test per GM/adjoining materials

Notes:

1. Updated ASTM or GRI methods may be implemented based on a review by the POR.
2. Direct shear testing shall be performed on the soil or GCL/geomembrane/geocomposite sandwich. Soak interface and apply normal stresses of 100, 200 and 400 psf for at least 1 hour prior to shearing at a displacement rate of 0.04 in/min.

3. The testing results shall be compared to the values used in the final cover system stability analyses included in the Appendix III3B-2E. If the measured interface shear strength is less than the values used in the analyses, the stability of the final cover system shall be reassessed and revised calculations shall be included in the FCSEER.
4. Test results from materials used during one construction event may be used in subsequent events provided the materials used are the same and approved by the POR.
5. Other methods such as D1603 (tube furnace) or D6370 (TGA) are acceptable if an appropriate correlation to D4218 (muffle furnace) can be established.

## **5.2 Installation Procedures**

### **5.2.1 Geomembrane Deployment**

The geomembrane shall be installed in direct and uniform contact with the cohesive soil coder or GCL. The geomembrane shall not be placed during inclement weather such as high winds or rain.

Geomembrane seaming should generally not take place when ambient temperatures are below 32 degrees Fahrenheit (°F), unless preheating is used. For extrusion welding, preheating will be required if the temperature is below 32°F. For fusion welding, preheating may be waived if the installer demonstrates that quality welds may be obtained without preheating. Seaming shall not be permitted at ambient temperatures above 104°F, unless the installer can demonstrate that seam quality is not compromised.

In general, only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geomembrane. If the POR observes any potential damage done to the liner by the support equipment, use of the equipment will cease and the damage will be repaired. Personnel working on the geomembrane shall not smoke, wear damaging shoes, or engage in any other activity likely to damage the geomembrane. Only those sections that are to be placed and seamed in one day should be unrolled. Panels left unseamed should be anchored with sandbags or other suitable weights. In general, seams should be oriented parallel to the line of maximum slope (i.e., oriented up and down, not across the slope). In corners and odd-shaped geometric locations, the number of field seams should be minimized.

Panels should be overlapped as recommended by the manufacturer as appropriate for the type of seam welding to be performed; however, overlapping shall be no less than 2 inches. Field seaming shall only be performed by the method(s) approved by the manufacturer, either by extrusion welding or double-tracked fusion welding. No seaming shall take place without the installer's supervisor or Master Seamer and CQA monitor being present. Fishmouths or wrinkles at the seam overlap shall be cut along the ridge of the wrinkle to achieve a flat overlap. The cut shall be seamed and/or patched. Seams shall extend to the outside edge of panels placed in the anchor trench.

Panel layout and field seams shall be given an identification code, mapped, and logged to record relevant installation information. Inspection and testing records shall be logged as well as repair and retest data. Section 5.0 includes a list of items to be documented during geomembrane construction and testing.

### 5.3 Installation Monitoring and Testing

#### 5.3.1 Trial Seams

Each day prior to commencing field seaming, trial seams shall be made on pieces of geomembrane material to verify that conditions are adequate for production seaming. Trial seams shall be made at the beginning of each seaming period and shift (generally, at least twice each day) for each combination of production seaming machine and operator to be used that day. The trial test seam shall be at least 3 feet long by 1 foot wide (after seaming) with the seam centered lengthwise. Four 1-inch wide specimens shall be die-cut from the trial seam sample. Two specimens shall be tested in the field for shear and two for peel (test both inner and outer welds for dual track fusion welding) and shall be compared to the minimum seam strength requirements specified in the most current version of the Geosynthetic Institute, GRI Test Method GM19. The current versions of the GRI test methods are included in Attachment 1.

If any of the trial seam specimens fail, the entire trial seam operation shall be repeated. If an additional specimen fails during the second trial seam, the seaming machine and seamer shall not be used for seaming until the deficiencies are corrected and two consecutive successful trial seams are achieved. Additional trial seams shall be made at each occurrence of significantly different environmental conditions, including, but not limited to, temperature, humidity, and dust, and after any machine is turned off for more than 30 minutes.

#### 5.3.2 Non-Destructive Testing

Continuous, non-destructive testing shall be performed on all seams by the installer. All leaks must be isolated and repaired by following the procedures described in this FCQCP.

Air Pressure Testing – ASTM D5820. The ends of the air channel of the dual-track fusion weld must be sealed and pressured to approximately 30 pounds per square inch (psi), if possible. The air pump must then be shut off and the air pressure observed after 2 minutes. A loss of less than 4 psi is acceptable if it is determined that the air channel is not blocked between the sealed ends. A loss greater or equal to 4 psi indicates the presence of a seam leak that must then be isolated and repaired by following the procedures described in this FCQCP. The POR or his/her qualified representative must observe and record all pressure gauge readings.

Vacuum-Box Testing – ASTM D5641. Apply a vacuum of approximately 4 to 8 psi to all extrusion welded seams that can be tested in this manner. The seam must be observed for leaks for at least 10 seconds while subjected to this vacuum. The POR or his/her qualified representative must observe 100 percent of this testing.

Other Testing. Other non-destructive testing must have prior written approval from the TCEQ.

### 5.3.3 Destructive Seam Testing

Destructive samples shall be taken at a minimum frequency of one test location, selected randomly, within each 500 linear feet of seam length, inclusive of both primary longitudinal and cross seams, cap strips, and repairs 20 square feet in total area or larger. Each test sample should be of sufficient length and 12 inches wide with the seam located in the middle. Test specimens, approximately 1 inch wide, shall be cut from both ends of the sample for field testing (peel and shear). The remaining sample should be cut into three parts (one for quality assurance laboratory testing, one for installer quality control laboratory testing, and one for archive storage to be maintained at a location selected by the owner).

The field tests shall be conducted on a certified calibrated tensiometer capable of maintaining a constant extension rate of 2 inches per minute. If one of the field test specimens from the ends of the destructive sample fails, then the seam will be considered to have failed, and repairs shall be initiated, as described below. If both specimens pass, then a sample for laboratory testing will be sent to the quality assurance laboratory for testing in both peel and shear. Seam strengths for LLDPE geomembranes shall meet the minimum values specified in the most current version of the Geosynthetic Institute, GRI Test Method GM19, "Seam Strength and Related Properties of Thermally Bonded Polyolefin Geomembranes."

Destructive test results for both field and laboratory tests shall include qualitative data, including the location of the failure and locus-of-break code as described in ASTM D6392. Peel tests on double-tracked fusion welds shall be performed on both inside and outside tracks of the weld. Seam break classifications for extrusion and fusion welds are shown on Figures III7A-1 and III7A-2, respectively.

At a minimum, a destructive test must be done for each welding machine used for seaming or repairs. A sufficient amount of the seam must be removed to conduct field testing, independent laboratory testing, and archiving of enough material to retest the seam when necessary. Destructive seam testing locations shall be cap-stripped and the cap completely seamed by extrusion welding to the geomembrane. Capped sections shall be non-destructively tested. Additional destructive test samples may be taken if deemed necessary by the POR or his/her qualified representative.

Weld Acceptance Criteria: For LLDPE seams, the minimum passing criteria for destructive seam testing are described in the Geosynthetic Institute, GRI Test Method GM19. The POR must use the most current version of GM19 when evaluating welded seams.

Seam Failure Delineation: When a sample fails a destructive test, the installer shall trace the welding path to an intermediate location at least 10 feet in each direction, or a distance determined by the POR, from the point of the failed test in each direction and take 1-inch wide specimens for an additional set of field tests. If these additional samples pass the tests, then two laboratory destructive samples shall be taken adjacent to the intermediate locations or at locations determined by the POR or his/her representative. If these laboratory samples pass the tests, then the seam shall be repaired between these locations. If either sample fails, then the process shall be repeated to establish a zone where the seam should be repaired. All

acceptable repaired seams shall be bounded by two locations from which samples passing laboratory destructive tests have been taken.

Seam Failure Repairs: Any portion of the geomembrane exhibiting a flaw or failing a destructive or non-destructive test shall be repaired. Repair methods may include spot welding (extrusion) for minor flaws and punctures; patches for larger holes and tears; capping for large lengths of failed seams or panel damage; and extrusion welding of outer flap to repair of an inadequate fusion seam (less than 100-foot cumulative length) that has an exposed edge.

For any repair method, the following provision shall be satisfied:

- Surfaces of the geomembrane that are to be repaired using extrusion methods shall be ground no more than one hour prior to the repair;
- All surfaces shall be clean and dry at the time of repair;
- Patches or caps shall extend at least 6 inches beyond the edge of the defect, and all corners of patches shall be rounded with a radius of approximately 3 inches;
- All repairs shall be non-destructively tested, as previously described; and
- All seaming equipment, personnel, and operation procedures used in repair work shall meet the same requirements as for new seaming operations.

The POR or his/her qualified representative shall observe all non-destructive testing of repairs and shall record the number of each repair, type, date, and test outcome. Repairs that pass the non-destructive tests shall be taken as an indication of an adequate repair. Repairs more than 150 feet long shall also be required to have a destructive test performed. Repairs that fail the initial retest shall be redone and retested until a passing test results. All work and testing of repairs shall be fully documented in a repair log.

When placing overlying material on the geomembrane, effort must be made to minimize wrinkle development. If possible, cover should be placed during the coolest weather available. Small wrinkles should be isolated and covered as quickly as possible to prevent their growth. In no case shall the geomembrane be allowed to fold over on itself.

## **6.0 DRAINAGE LAYER**

The geocomposite drainage layer shall conform to the material and performance properties specified in Table III7D-1-6, Geocomposite Drainage Layer Specifications. Manufacturers' certificates of material and performance characteristics shall be obtained and documented at the minimum frequency shown on Table III7D-1-6, Geocomposite Drainage Layer Specifications, with not less than 1 per resin lot. Geosynthetic drainage material conformance testing will consist of transmissivity testing on each material type using the test set-up described in Table III7D-1-6, Geocomposite Drainage Layer Specifications.

The drainage layer is a double-sided geocomposite that consists of a geonet with a non-woven geotextile heat-bonded on both sides deployed over the final cover area. The double-sided geocomposite shall be anchored in an anchor trench at the perimeter of the final cover area or as shown on Figures III7-2A and

III7-2B. The geonet core of the geocomposite will be tied together using plastic ties placed at a frequency of one per 5 feet along the length of the panel and every 6 inches along the ends of the panels. The upper geotextile panels will be secured by either overlapping and heat bonding or field sewn.

Only low ground pressure rubber-tired support equipment approved by the POR may be allowed on the geotextile. Personnel working on the geotextile shall not smoke, wear damaging shoes, or engage in any activity that damages the geotextile or underlying geosynthetics.

**Table III7D-1-6: Geocomposite Drainage Layer Specifications**

Test Category	Product	Test <sup>a</sup>	Test Method <sup>b</sup>	Testing Frequency
Manufacturer	Resin (Geonet)	Density	ASTM D792 or D1505	One test per 100,000 ft <sup>2</sup> and every resin lot
		Melt Flow Index	ASTM D1238	
Manufacturer	Geonet	Density	ASTM D792 or D1505	One test per 100,000 ft <sup>2</sup> and every resin lot
		Nass / Area	ASTM D5261	
		Thickness	ASTM D5199	
		Compression	ASTM D1621	
		Transmissivity	ASTM D4716	
Manufacturer	Geotextile	Mass/Area	ASTM D5261	One test per 100,000 ft <sup>2</sup> and every resin lot
		Grab Tensile Strength	AASTM D4632	
		Trapezoidal Tear Strength	ASTM D4533	
		Burst Strength	ASTM D3786	
		Puncture Strength	ASTM D4833	
		Thickness	ASTM D5199	
		Apparent Opening Size	ASTM D4751	
		Permittivity	ASTM D4491	
Independent Laboratory	Geocomposite Product	Transmissivity	ASTM D4716	One test per product type
		Interface Shear or Ply Adhesion	ASTM D5321 OR D413	One test per project

<sup>a</sup> Adapted from EPA/600/R-93/182, September 1993, and *Designing with Geosynthetics*, 6<sup>th</sup> ed.

<sup>b</sup> The POR may propose equivalent or better tests.

## 7.0 EROSION LAYER

The soil cover layer will consist of an 24-inch thick single protective/erosion layer. See Section 2.0 of this plan for a detailed description of the final cover system.

Soil cover does not require compaction control; however, it should be stable for construction traffic. Care shall be exercised in placement so as not to shift, wrinkle, or damage any underlying geosynthetic layers, and the placement methods shall be documented. Soil cover placement shall be monitored by the POR or his/her representative on a full-time basis.

Only the geocomposite should be placed in direct contact with the geomembrane. Light equipment, such as low ground pressure dozers (less than 5 psi contact pressure), shall be used to place the soil cover and a minimum of 12-inches of material shall be maintained between the dozer and the underlying geosynthetics. If possible, cover should be placed during the coolest weather available. Soil cover material shall be deployed in “fingers” along the geosynthetics to control the amount of slack and minimize wrinkles and prevent folds. Soil cover shall generally be placed in an upslope direction on sideslopes.

The final thickness of the soil cover layer shall be a minimum of 24-inches directly above the geocomposite drainage layer. The required thickness of the layer shall be verified by survey techniques on an established grid system with not less than one verification point per 10,000 square feet of surface area. A minimum of two verification points is required.

The soil used as the soil cover layer will be capable of sustaining native plant growth and must be seeded or sodded immediately after completion of the final cover (weather permitting). Temporary or permanent erosion control materials (i.e., mulches, containment meshes, geomatting systems, etc.) may be used to minimize erosion and aid establishment of vegetation. An alternative erosion layer may also be constructed (subject to the approval of TCEQ) consisting of cobbles, riprap, or other hard armor systems for areas where establishing vegetative cover has proven difficult.

Other quality assurance for the soil cover layer should consist of continuous observation by the POR or his/her representative during construction; inspection of any manufacturer’s or supplier’s material test data and certification; and performing any additional test believed necessary by the POR to verify that the layer has been constructed in accordance with the closure plan.

## **8.0 FINAL COVER SYSTEM EVALUATION REPORT**

Upon completion of all required final cover construction and evaluation, the POR shall prepare and submit in triplicate the FCSER, prepared in accordance with this plan, to the TCEQ for review and approval.

Each FCSER will include a discussion of the construction of the final cover elements and a cover placement map, which not only shows the covered area being submitted for approval, but also the areas covered by all previous FCSER submittals with the dates of acceptance by the TCEQ. The map should depict the site grid system, graphic scale, and north arrow. It may be a print from a master drawing that is annotated and

updated with each new submittal. The FCSEER shall be signed and/or sealed by the POR performing the evaluation and counter-signed by the site operator or his/her authorized representative.

The construction documentation will contain a narrative describing the conduct of work and testing programs required by the FCQCP, “as-built” or record drawings, and appendices of field and laboratory testing. Constructed cover details (“as-builts”), where applicable, will be depicted and will show slopes, widths, and thickness for compaction lifts as determined from the field documentation. The construction documentation report will contain or discuss the following information at a minimum.

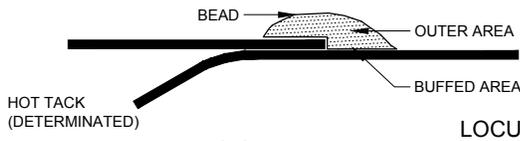
**Table III3D-1-7: FCSEER Content**

<b>Cohesive Soil Cover</b>	Pre-construction soil test results
	Summary of construction material conformance tests results
	Summary of field moisture-density control test methods and results
	Summary of hydraulic conductivity test results
	Cohesive soil cover construction practices
	Placement and processing methods
	Observations of soil conditions prior to and after compaction, including soil structure, clod size, and presence of inclusions
	Compaction methods, equipment type, compactor weight and foot length, and number of passes
	Lift tie-in and bonding observations
	Repair of failed and damaged lifts
	Any and all deviations from the permitted design
	Thickness Verification
	Post-construction care of cohesive soil cover

<b>Geosynthetic Clay Liner</b>	Roll shipment and receipt information
	Manufacturer's quality control certificates and results
	Storage and handling information
	Conformance test sampling and test results
	Subgrade acceptance
	Panel deployment, identification, and placement
	Equipment placed or operated on GCL
	100 percent visual inspection for defects, damage, etc.
	Seaming methods
Repairs, including patch size and shape	
<b>Geomembrane Liner</b>	Roll shipment and receipt information
	Manufacturer's quality control certificates and results
	Storage and handling information
	Conformance test sampling and test results
	Seamer's names and resumes of experience and qualifications
	Subgrade acceptance
	Panel deployment, identification, and placement
	Seam preparation, orientation, and identification
	Equipment placed or operated on geomembrane
	100 percent visual inspection for defects, damage, etc.
	Trial seam tests for each combination of seaming equipment and personnel
	Seaming methods, times, temperature, and equipment shutdowns and startups
	Continuous 100 percent non-destructive seam testing, methods, criteria, and results
	Destructive testing methods, criteria, and results
	Repairs, including preparation and procedures, failure delineation, patch size and shape, and retesting
Material properties and placement of drainage materials and soil cover	
Confirmation of the interface friction angle for the geomembrane/adjoining material interface and a recalculation of the factor of safety, if needed.	
<b>Record Drawings</b>	Layout plan
	Previous covered areas
	As-built cohesive soil cover drawings, showing sample and test locations, and thickness
	As-built GCL panel layout drawings
	As-built geomembrane panel layout drawings, showing location of destructive test samples, patches, and repairs
	As-built drawings showing elevations of soil cover to confirm its thickness

## 9.0 REFERENCES

Scalia, J.S. and C.H. Benson, 2011. Hydraulic Conductivity of Geosynthetic Clay Liners Exhumed from Landfill Final Covers with Composite Barriers, Journal of Geotechnical and Geoenvironmental Engineering, Vol. 137, No. 1.



UNTESTED SPECIMEN  
EXTRUSION WELD WITH LEISTER HEAT SEAM

TYPES OF BREAK	LOCUS-OF-BREAK CODE	BREAK DESCRIPTION
	AD1	FAILURE IN ADHESION. SPECIMENS MAY ALSO DELAMINATE UNDER THE BEAD AND BREAK THROUGH THE THIN EXTRUDED MATERIAL IN THE OUTER AREA.
	AD2	FAILURE IN ADHESION
	AD-WLD	BREAKS THROUGH THE FILLET. BREAKS THROUGH THE FILLET RANGE FROM BREAKS STARTING AT THE EDGE OF THE TOP SHEET TO BREAKS THROUGH THE FILLET AFTER SOME ADHESION FAILURE BETWEEN THE FILLET AND THE BOTTOM SHEET.
	SE1	BREAK AT SEAM EDGE IN THE BOTTOM SHEET. SPECIMENS MAY BREAK ANYWHERE FROM THE BEAD/OUTER AREA EDGE TO THE OUTER AREA/BUFF AREA. (APPLICABLE TO SHEAR ONLY).
	SE2	BREAK AT SEAM EDGE IN THE TOP SHEET. SPECIMENS MAY BREAK ANYWHERE FROM THE BEAD/OUTER AREA EDGE TO THE OUTER AREA/BUFF AREA. (APPLICABLE TO SHEAR ONLY).
	SE3	BREAK AT SEAM EDGE IN THE BOTTOM SHEET. (APPLICABLE TO PEEL ONLY).
	BRK1	BREAK IN THE BOTTOM SHEETING. A "B" IN PARENTHESIS FOLLOWING THE CODE MEANS THE SPECIMEN BREAK IN THE BUFFED AREA. (APPLICABLE TO SHEAR ONLY).
	BRK2	BREAK IN THE TOP SHEETING. A "B" IN PARENTHESIS FOLLOWING THE CODE MEANS THE SPECIMEN BREAK IN THE BUFFED AREA. (APPLICABLE TO SHEAR ONLY).
	AD-BRK	BREAK IN THE BOTTOM SHEETING AFTER SOME ADHESION FAILURE BETWEEN THE FILLET AND THE BOTTOM SHEET. (APPLICABLE TO PEEL ONLY).
	HT	BREAK AT THE EDGE OF THE HOT TACK FOR SPECIMENS WHICH COULD NOT BE DELAMINATED IN THE HOT TACK.
	SIP	SEPARATION IN THE PLANE OF THE SHEET.

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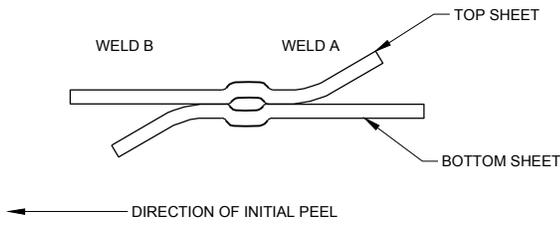
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CLIENT	PROJECT
CONSULTANT	EDINBURG REGIONAL DISPOSAL FACILITY PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C EDINBURG, HIDALGO COUNTY, TEXAS
YYYY-MM-DD	TITLE
DESIGNED	<b>EXTRUSION WELD SEAM BREAK CLASSIFICATION</b>
PREPARED	PROJECT NO.
REVIEWED	APPLICATION SECTION
APPROVED	REV.
	FIGURE



2017-11-07  
CEI  
AA  
MX  
JBF  
1401491 III7D1 0 III7D-1-1



SCHEMATIC OF UNTESTED SPECIMEN

TYPES OF FAILURE	LOCUS-OF-BREAK CODE	BREAK
	AD	ADHESION FAILURE
	BRK	BREAK IN SHEETING. BREAK CAN BE IN EITHER TOP OR BOTTOM SHEET.
	SE1	BREAK AT OUTER EDGE OF SEAM. BREAK CAN BE IN EITHER TOP OR BOTTOM SHEET.
	SE2	BREAK AT INNER EDGE OF SEAM THROUGH BOTH SHEETS.
	AD-BRK	BREAK IN FIRST SEAM AFTER SOME ADHESION FAILURE BREAK CAN BE IN EITHER THE TOP OR BOTTOM SHEET
	SIP	SEPARATION IN THE PLANE OF THE SHEET. BREAK CAN BE IN EITHER TOP OF BOTTOM SHEET.

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CLIENT



CONSULTANT

YYYY-MM-DD 2017-11-07  
 DESIGNED CEI  
 PREPARED AA  
 REVIEWED MX  
 APPROVED JBF

PROJECT  
 EDINBURG REGIONAL DISPOSAL FACILITY  
 PERMIT AMENDMENT APPLICATION TCEQ PERMIT MSW-956C  
 EDINBURG, HIDALGO COUNTY, TEXAS

TITLE  
**FUSION WELD SEAM BREAK CLASSIFICATION**

PROJECT NO. 1401491 APPLICATION SECTION III7D1 REV. 1 FIGURE III7D-1-2

# POST CLOSURE CARE PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C



**Prepared for:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

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

INTENDED FOR PERMITTING  
PURPOSES ONLY

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491

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

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## **EXECUTIVE SUMMARY**

30 TAC §330.63(i) & §330.463(b)(3)(B)

This post-closure plan is prepared in accordance with 30 TAC Chapter 330 Subchapter K and the City shall place a copy of this plan in the operating record upon issuance of this permit. The post-closure plan includes a description of the monitoring and maintenance activities required and the frequency at which these activities will be performed. The City is the responsible for overseeing and conducting post-closure care activities.

City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, TX. 78541  
(956) 381-5635

Also included in this post-closure plan is a description of the planned uses of any portion of the closed unit during the post-closure period in accordance with 30 TAC §330.465. A detailed written estimate, in current dollars, of the cost of post-closure care maintenance and any corrective action as described in this post-closure care plan or required by the TCEQ is included in Part III9B, TCEQ Post-Closure Cost Estimate Form.

## **1.0 POST-CLOSURE CARE REQUIREMENTS**

### 30 TAC §330.463(b)(3)(A)

Monitoring and maintenance activities are required in post-closure care period. Post-closure care activities will follow the measures and conditions specified in Appendix III8A, TCEQ Post Closure Care Plan Form. A description of these activities and the frequency at which these activities will be performed are included in the following sections.

### **1.1 Post-Closure Care Period**

#### 30 TAC §§330.463 (b)(1) & §330.463(b)(2)

After professional engineer certification of the completion of closure requirements for a municipal solid waste management unit as accepted by the TCEQ, the City shall conduct post-closure care for the unit for 30 years, unless revised by the TCEQ. The post-closure care period may be decreased by the TCEQ if the City submits to the TCEQ for review and approval a documented certification, signed by a licensed professional engineer and including all applicable documentation necessary to support the certification, which demonstrates that the reduced period is sufficient to protect human health and the environment. The TCEQ may also reduce the post-closure period for the unit if all wastes and waste residues have been removed during closure. The post-closure period care period may be increased by the TCEQ if it is determined that the lengthened period is necessary to protect human health and the environment. If there is evidence of a release from a municipal solid waste unit, the TCEQ may require an investigation into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

### **1.2 Inspection Activities and Correction of Problems**

#### 30 TAC §330.463 (b)(1)(A)

The site operator will conduct periodic inspection of the closed units to identify and document deficiency conditions and conduct maintenance and corrective action to maintain compliance. Tables III8-1 through III8-6 provide information on the inspection items and deficiency conditions that the site operator will look for during inspection of the major components of the landfill and the site during the post-closure care period. The City shall correct, as needed, erosion of cover material, lack of vegetative growth, leachate or methane migration, and subsidence or ponding of water on the unit. If any of these problems occur after the end of the five-year post-closure period or persist for longer than the first five years of post-closure care, the City shall be responsible for their correction until the TCEQ determines that all problems have been adequately resolved. Other inspection and maintenance provisions that apply during the post-closure care period as specified in the facility's site operating plan, site development plan, or applicable rules will remain in effect.

The City shall retain the right of entry to and maintain all rights-of-way of a closed municipal solid waste management unit in order to conduct periodic inspections of the closed unit, conduct maintenance and/or remediation activities, as needed, in order to maintain the integrity and effectiveness of all final cover, facility vegetation, and drainage control system, to correct any effects of settlement, subsidence, ponded water, erosion, or other events or failures detrimental to the integrity of the closed unit and to prevent any surface run-on and run-off from eroding or otherwise damaging the final cover system.

### 1.2.1 Right of Entry and Rights-of-way

During the post-closure monitoring and maintenance period of the site, the facility access and Rights-of-way will be inspected quarterly. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.

**Table III8-1: Access and Right-of-way Inspection Items**

Inspection Item	Types of Deficiency Conditions
Gates, Gate Locks and Barriers	Damaged, gates unlocked/locks missing, signs of site entry detected
Fence and other Access Control Barriers	Damaged, broken, signs of entry detected
Vegetation Control in Areas of the Facility other than the Final Cover	Vegetative stress, overgrowth, vegetation other than what was designated in that area

### 1.2.2 Final Cover

During the post-closure monitoring and maintenance period of the site, the final cover will be inspected quarterly. Monitoring and maintenance activities will be performed to maintain the integrity and effectiveness of the final cover system. Items included in the quarterly assessment will include inspection of the final cover for vegetation, erosion, and functionality of the surface water drainage system. Erosion, cuts, and depressions in the final cover will be noted, as will damage and debris and sediment build-up in the drainage system. Maintenance will include performing final cover repairs to fill erosion cuts and low areas. Drainage systems will be regraded as necessary and cleared of debris and sediment, as needed, to facilitate continued performance. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.

**Table III8-2: Final Cover Inspection Items**

Inspection Item	Types of Deficiency Conditions
Vegetation and other Ground Cover Materials	Vegetative stress, vegetation height and whether mowing is required, presence of weeds or sprouting saplings that may develop root systems capable of compromising the final cover, erosion and functionality of the surface water drainage system

Inspection Item	Types of Deficiency Conditions
Settlement	Settlement or other problems developed between inspections
Subsidence	Cuts and depressions
Ponded Water	Damage, debris or sediment buildup, potential for ponding
Erosion	Rills and depressions, soil loss, gullies

### 1.2.3 Drainage Control System

During the post-closure monitoring and maintenance period of the site, the drainage control system will be inspected quarterly. Monitoring and maintenance activities will be performed to maintain the integrity and effectiveness of the drainage control system. Items included in the quarterly assessment will include functionality of the surface water drainage system. Drainage systems will be regraded as necessary and cleared of debris and sediment, as needed, to facilitate continued performance. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.

**Table III8-3: Drainage Control System Inspection Items**

Inspection Item	Types of Deficiency Conditions
Vegetation within Drainage Control Structures	Vegetative stress or overgrowth, sediment buildup, damage to the control structures, cracks in the channel lining, impairment of flow
Component Failures	Outlet structure damage or clogging, other structural damages, impairment of flow
Wash Outs	Erosion, depressions or cuts, ponded areas
Sediment Build Up	Presence of obstructions in the flow paths erosion, settlement and ponding

### 1.2.4 Leachate Collection and Removal System

30 TAC §330.463(b)(1)(B)

The City shall maintain and operate the leachate collection and removal system throughout the post-closure care period in accordance with the requirements of 30 TAC §330.331 and §330.333 and Part III3, Waste Management Unit Design Report. The components of the leachate collection and removal system will be routinely inspected to maintain its integrity and effectiveness. The need for maintenance will be assessed based on performance during routine monitoring. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection. The TCEQ may allow the City to stop managing leachate if the City demonstrates to the approval of the TCEQ that leachate no longer poses a threat to human health and the environment.

**Table III8-4: Leachate Collection and Removal System Inspection Items**

Inspection Item	Types of Deficiency Conditions
Leachate Pumps	Visible damage to pumps, abnormal flow rates or odors.
Leachate Forcemain	Visible damage to forcemains, abnormal flow rates or odors.
Leachate Collection Lines	Abnormal flow rates or odors. Leachate collection lines may need periodic cleaning or flushing to dislodge biological mass or fines than may have clogged the pipe perforations.

### 1.2.5 Landfill Gas Management System

The City shall maintain and operate the landfill gas management system throughout the post-closure care period in accordance with the requirements of Part III6, Landfill Gas Management Plan. The components of the landfill gas management system will be routinely inspected to maintain its integrity and effectiveness. The need for maintenance will be assessed based on performance during routine monitoring. At a minimum, maintenance will be performed as needed prior to the next scheduled inspection.

**Table III8-5: Landfill Gas Management System Inspection Items**

Inspection Item	Types of Deficiency Conditions
Gas Wells	Visible damage and landfill gas extraction performance.
Lateral and header piping	Cracks, bends, breakage or blockage of landfill gas flow
Condensate Sumps	Visible damage and performance.
Flare Station	Visible damage and performance. May need calibration.

### 1.2.6 Groundwater and Gas Monitoring Systems

During the post-closure monitoring and maintenance period of the site, the groundwater and gas monitoring systems will be routinely inspected to maintain their integrity and effectiveness. Particular attention will be paid to ensure that monitoring equipment is calibrated according to the manufacturers' recommendations. Maintenance of the groundwater and gas monitoring systems will be performed prior to or during the next scheduled sampling or monitoring event, depending on the extent of the repairs or maintenance required.

**Table III8-6: Groundwater and Gas Monitoring Inspection Items**

Inspection Item	Types of Deficiency Conditions
Groundwater Monitoring Wells	Visible damage to protective casing, well locks, or concrete pads.
Landfill Gas Monitoring Probes	Visible damage to protective casing, well locks, or concrete pads.

## 1.3 Continuation of Monitoring Programs

Groundwater and gas monitoring programs in effect during the life of the unit shall be continued during the post-closure care period. If there is evidence of a release from a municipal solid waste unit, the TCEQ may

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Submitted: July 2017

Revised: October 2017

require an investigation into the nature and extent of the release and an assessment of measures necessary to correct an impact to groundwater.

### **1.3.1 Groundwater Monitoring System**

30 TAC §330.463(b)(1)(C)

Groundwater monitoring activities will continue throughout the post-closure care period in accordance the requirements of 30 TAC Chapter 330 Subchapter J and Part III5B, Groundwater Sampling and Analysis Plan (GWSAP). All groundwater monitoring wells including in the groundwater monitoring network will be monitored semi-annually unless otherwise approved by the TCEQ. If there is evidence of a confirmed statistically significant increase over constituent background values, the City shall implement an assessment monitoring plan outlined in Part III5B, GWSAP.

### **1.3.2 Gas Monitoring System**

30 TAC §330.463(b)(1)(D)

Landfill gas monitoring activities will continue throughout the post-closure care period, in accordance with the requirements of 30 TAC Chapter 330 Subchapter I and Part III 6, Landfill Gas Management Plan, as conducted during the active facility operations. All structures and permanent gas monitoring probes will be sampled quarterly unless otherwise approved by the TCEQ. If there is evidence of confirmed landfill gas migration from the waste management units at the facility, the City shall implement the contingency plan in Part III6, Landfill Gas Management Plan.

## **1.4 Documentation and Record Keeping**

30 TAC §330.463(b)(3)

The City will document and maintain detailed records of all inspection results and schedules, maintenance, monitoring results and schedules, or remediation activities of any other actions to be taken to maintain compliance in the site operating record.

The City shall place a copy of the post-closure care plan in the operating record by the initial receipt of waste. The post-closure care plan shall include, at a minimum, the following information:

### **1.4.1 Description of Monitoring and Maintenance Activities**

30 TAC §330.463(b)(3)(A)

The post-closure care plan shall include a description of the monitoring and maintenance activities required in 30 TAC §330.463(b)(1) for each unit, and the frequency at which these activities will be performed.

Monitoring and maintenance activities required and the frequency at which these activities will be performed are included in §1.0, Post-Closure Care Requirements and Appendix III8A, TCEQ Post Closure Care Plan.

#### **1.4.2 Post-Closure Care Responsibility**

30 TAC §330.463(b)(3)(B)

The post-closure care plan shall include the name, address, and telephone number of the office or person responsible for overseeing and/or conducting the post-closure care activities at the closed unit or facility during the post-closure period. The City is responsible for overseeing and conducting post-closure care activities.

City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, TX. 78541  
(956) 381-5635

#### **1.4.3 Post-Closure Planned Uses**

30 TAC §330.463(b)(3)(C)

The post-closure care plan shall include a description of the planned uses of any portion of the closed unit during the post-closure period in accordance with 30 TAC §330.465, Certification of Completion of Post-Closure Care. Currently, post-closure land use is anticipated to be open space, and will be in accordance with requirements for development over a closed MSW landfill in post-closure care in 30 TAC §330.954(c).

#### **1.4.4 Post-Closure Care Cost Estimate**

30 TAC §330.463(b)(3)(D)

The post-closure care plan shall include a detailed written estimate, in current dollars, of the cost of post-closure care maintenance and any corrective action as described in the post-closure care plan or required by the executive director or the commission and which satisfies the requirements specified in 30 TAC §330, Subchapter L. A detailed post-closure care cost estimate, in current dollars, is included in Part III9B, TCEQ Post-Closure Care Cost Estimate Form.

## **2.0 COMPLETION OF POST-CLOSURE CARE**

Completion of post-closure care will follow the conditions specified in Appendix III8A, TCEQ Post Closure Care Plan Form.

### **2.1 Certification of Post-Closure Care Completion**

30 TAC §330.465(a)

Following completion of the post-closure care maintenance period for each municipal solid waste landfill unit, the City shall submit to the TCEQ for review and approval a certification, signed by an independent licensed professional engineer, verifying that post-closure care has been completed in accordance with this post-closure plan. The submittal to the TCEQ shall include all applicable documentation necessary for the certification of completion of post-closure care. Once approved, the certification and all applicable documentation will be included in the site's operating record.

## **2.2 Voluntary Revocation**

30 TAC §330.465(b)

Upon completion of the post-closure care period for the final unit at a facility, the City shall also submit to the TCEQ a request for voluntary revocation of the facility permit. Once approved, the voluntary revocation and will be included in the site's operating record.

**APPENDIX III8A**

**TCEQ POST CLOSURE CARE PLAN FORM**



PERMIT AMENDMENT APPLICATION  
Part III, Attachment 9

# CLOSURE AND POST-CLOSURE CARE COST ESTIMATES

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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July 2017  
Revised: November 2017

Project No. 1401491



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Appendix III9B	TCEQ Post-Closure Cost Estimate Form
Appendix III9C	Current Evidence of Financial Assurance



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Professional Engineering Firm  
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## **EXECUTIVE SUMMARY**

30 TAC §§330.63(j) & 305.70(j)(30)

The City has included a cost estimate for closure and post-closure care in accordance with 30 TAC §330 Subchapter L and documentation required to demonstrate financial assurance as specified in 30 TAC §37 Subchapter R. The City may request as permit modification that does not require notice in accordance with 30 TAC §330.305(j)(30), for changes to a closure or post-closure care cost estimate required under 30 TAC §§330.503 or 330.507 that result in an increase/decrease in the amount of financial assurance required if the increase/decrease in the cost estimate is due to an increase/decrease in the maximum area requiring closure.

### **1.0 CLOSURE COST ESTIMATE**

30 TAC §330.503(a)

The detailed written cost estimate, in current dollars, showing the cost of hiring a third party to close the largest waste fill area that could potentially be open in the year to follow and those areas that have not received final cover in accordance with Part III7, Closure Plan is included in Appendix III9A, TCEQ Closure Care Cost Estimate Form.

#### **1.1 Annual Review**

30 TAC §330.503(a)(1)

The City shall review the facility's permit conditions on an annual basis and verify that the current active areas match the areas on which closure cost estimates are based.

##### **1.1.1 Closure Cost Increase**

30 TAC §330.503(a)(2)

An increase in the closure cost estimate and the amount of financial assurance shall be made if changes to the final closure plan or the landfill conditions increase the maximum cost of closure at any time during the remaining active life of the unit.

##### **1.1.2 Closure Cost Reduction**

30 TAC §330.503(a)(3)

A reduction in the closure cost estimate and the amount of financial assurance may be approved if the cost estimate exceeds the maximum cost of closure at any time during the remaining life of the unit and the City has provided written notice to the TCEQ of the situation that includes a detailed justification for the reduction

of the closure cost estimate and the amount of financial assurance. The City may request a reduction in the cost estimate and the financial assurance as a permit modification in accordance with 30 TAC §330.305(j)(30).

## **1.2 Financial Assurance**

### 30 TAC §330.503(b)

The City has established financial assurance for closure of the municipal solid waste units in accordance with 30 TAC §37, Subchapter R. Continuous financial assurance coverage for closure shall be provided until the facility is officially placed under the post-closure maintenance period and all requirements of Part III7, Closure Plan have been approved as evidenced in writing by the TCEQ.

In accordance with 30 TAC §37.131, during the active life of the facility, the current cost estimate will be adjusted annually for inflation within 60 days prior to the anniversary of the establishment of the financial instrument(s) used. The evidence of any additional financial assurance will be provided to the TCEQ within 30 days after the anniversary date of the first establishment of the financial assurance mechanism.

The adjustment for inflation may be made by recalculating the maximum cost of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the US Department of Commerce in the Survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. Multiplying the closure cost estimate by the inflation factor makes the first adjustment. The result is the adjusted closure cost estimate. Multiplying the latest adjusted closure cost estimate by the latest inflation factor makes subsequent adjustments. If the TCEQ approves a revised closure cost estimate prior to the annual inflation update, an additional update for inflation only is not required. The regular annual inflation update will resume the following year.

In accordance with 30 TAC §330.63(j), a copy of the financial assurance documentation for closure of the facility is included in Appendix III9C, Current Evidence of Financial Assurance.

## **2.0 POST-CLOSURE CARE COST ESTIMATE**

### 30 TAC §330.507(a)

The City has provided in Appendix III9B, TCEQ Post-Closure Care Cost Estimate Form a detailed written cost estimate, in current dollars, of the cost of hiring a third party to conduct post-closure care activities for the municipal solid waste units, in accordance with the post-closure care plan. The post-closure care cost estimate used to demonstrate financial assurance in 30 TAC §330.507(b) shall account for the total costs of conducting post-closure care for the largest area that could possibly require post-closure care in the year

to follow, including annual and periodic costs as described in the post-closure care plan over the entire post-closure care period.

## **2.1 Annual Review**

### **2.1.1 Increase in Post-Closure Care Cost Estimate**

30 TAC §330.507(a)(1)

An increase in the post-closure care cost estimate and the amount of financial assurance provided under 30 TAC §330.507(b) shall be made if changes in the post-closure care plan or the unit conditions increase the maximum costs of post-closure care.

### **2.1.2 Reduction in Post-Closure Care Cost Estimate**

30 TAC §330.507(a)(2)

A reduction in the post-closure care cost estimate and the amount of financial assurance provided under 30 TAC §330.507(b) may be allowed if the cost estimate exceeds the maximum costs of post-closure care remaining over the post-closure care period and the City has provided written notice to the TCEQ of the detailed justification for the reduction of the post-closure cost estimate and the amount of financial assurance. The City may request a reduction in the cost estimate and the financial assurance as a permit modification in accordance with 30 TAC §330.305(j)(30).

## **2.2 Financial Assurance**

30 TAC §330.507(b)

The City has established financial assurance for the costs of post-closure care of the unit in accordance with 30 TAC §37, Subchapter R. Continuous financial assurance coverage for post-closure care shall be provided until the facility is officially released in writing by the TCEQ from the post-closure care period in accordance with all requirements of the Part III8, Post-Closure Care Plan.

In accordance with 30 TAC §37.131, during the active life of the facility, the current cost estimate will be adjusted annually for inflation within 60 days prior to the anniversary of the establishment of the financial instrument(s) used. The evidence of any additional financial assurance will be provided to the TCEQ within 30 days after the anniversary date of the first establishment of the financial assurance mechanism.

The inflation adjustment may be made by recalculating the maximum cost of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the US Department of Commerce in the Survey of Current Business. The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year. Multiplying the

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Revised: November 2017

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closure cost estimate by the inflation factor makes the first adjustment. The result is the adjusted closure cost estimate. Multiplying the latest adjusted closure cost estimate by the latest inflation factor makes subsequent adjustments. If the TCEQ approves a revised post-closure cost estimate prior to the annual inflation update, an additional update for inflation only is not required. The regular annual inflation update will resume the following year.

In accordance with 30 TAC §330.63(j), a copy of the financial assurance documentation for post closure care of the existing facility is included in Appendix III9C, Current Evidence of Financial Assurance.



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  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

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July 2017  
Revised: November 2017

Project No. 1401491



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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

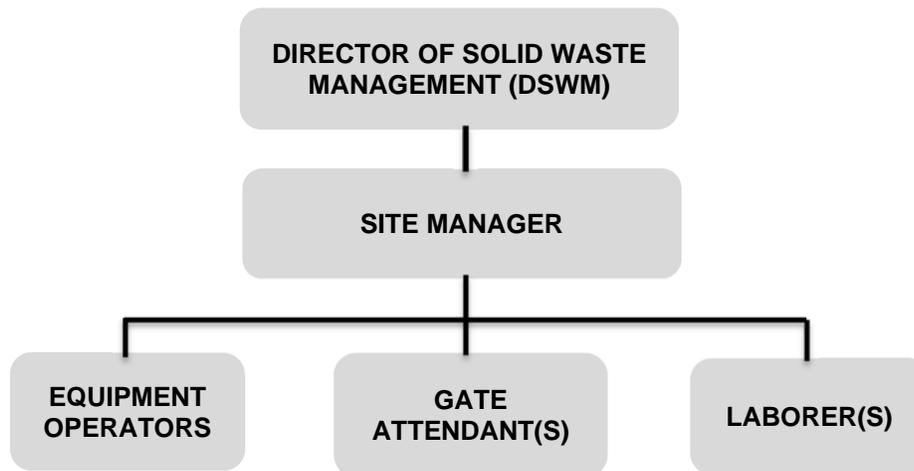
The City shall maintain records to document the annual waste acceptance rate for the facility. Documentation must include maintaining the quarterly solid waste summary reports and the annual solid waste summary reports required by 30 TAC §330.675 through the State of Texas Environmental Electronic Reporting 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 <sup>(1)(2)</sup> (Tons Per Year)				Minimum <sup>(3)</sup> 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 <sup>(2)</sup>	1	1	1	1	2.5 cy bucket	Excavation of soil, fire protection
Haul Truck <sup>(2)</sup>	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 SOP. 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
<b>Site Manager</b>	Responsible for all activities, ensure adequate staffing, inspections	X	X	X	X	X	X	X	X	X	X	X	X	X	X
<b>Gate Attendant</b>	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
<b>Equipment Operator</b>	Compact waste, visual inspection of loads, unauthorized waste identification, apply daily cover	X		X	X	X	X	X	X	X	X		X		As Assigned
<b>Laborer</b>	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 half of one percent of the incoming loads per week (no less than 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 discussed 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 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 placed 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**

<b>Unloading Area</b>	<b>Description</b>	<b>Maximum Size</b>
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
Citizen’s Collection Station	Private citizen and other small loads may be delivered to the citizen’s collection station.	40,000 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 Citizens Collection Station

30 TAC §330.213

The citizens collection station will be used for small loads. The gate attendant will direct vehicles to this area as appropriate. Roll-off boxes will be provided to unload waste. The boxes will be emptied at the working face as needed. The maximum size will be 40,000 sqft. (e.g., 200 feet by 200 feet).

The type and quantity of containers provided will correspond to anticipated waste receipt volumes. Containers will be delivered to an active disposal area daily or tarped overnight. The City will supervise the area designated for citizen's collection routinely in order to maintain it in a sanitary condition. Rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance. Citizen's collection may accept sharps from single-family or multi-family dwellings, hotels, motels, or other establishments that provide lodging and related services for the public. The sharps will not be considered medical waste, as defined in 30 TAC §330.3.

#### 4.6.1.6 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.

#### 4.6.1.7 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.

#### 4.6.1.8 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 Parts III and IV.

**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 III E2-3, 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.

#### **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). The City may submit a demonstration for TCEQ approval that material exceeding 1,500 mg/kg TPH can be a suitable ADC. The demonstration shall include information regarding the risk to human health and the environment and the information required in §4.22.3.1, Required ADCOP Information. If approved, the TCEQ may impose additional permit requirements regarding the use of this material.

##### 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. A maximum of 50 tons of materials may be stored at one time. These materials can be stored for a maximum of 72 hours and 24 hours on average.

### **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).

### 4.29.1 Contaminated Water

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 contaminated water storage area, 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 with one foot of freeboard. Contaminated water will either be allowed to flow into the leachate collection and removal system or any ponded contaminated water will be pumped within seven days of occurrence directly into the leachate force main connected to a public sewer system in accordance with Part III3, Waste Management Unit Design.

#### 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, Waste Management Unit Design Gas Condensate

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

#### 4.29.3 Cleaning and Washing of Equipment

Wastewater generated from the cleaning and washing of equipment, to be performed only within a constructed waste disposal unit constructed in accordance with 30 TAC §330.331(b), will either be allowed to flow into the leachate collection and removal system or any ponded wastewater will be pumped within seven days of occurrence directly into the leachate force main connected to a public sewer system in accordance with Part III3, Waste Management Unit Design.

### 4.30 Citizen's Collection

30 TAC §330.213

Waste accepted from citizens and other small loads may be delivered to an area designated for citizen's collection where waste shall be unloaded in to roll-off containers whereas the quantity of containers provided will correspond to anticipated waste receipt volumes. Roll-off containers shall be leak-proof to maintain sanitary conditions per 30 TAC §330.211. Containers will be delivered to active disposal area daily or tarped overnight. The City will supervise the area designated for citizen's collection routinely in order to maintain it in a sanitary condition. Rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance. Citizen's collection may accept sharps from single-family or multi-family dwellings, hotels, motels, or other establishments that provide lodging and related services for the public. The sharps will not be considered medical waste, as defined in 30 TAC §330.3.

### 4.31 Waste Relocation

The 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 34 degrees.
- Leachate found while uncovering buried waste shall be properly disposed in accordance to §4.29, Contaminated Water Management.
- 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.
- Use of any additional personal protection equipment required to safeguard health.

**APPENDIX IVG  
REGULATED ASBESTOS CONTAINING MATERIAL HANDLING PLAN**

# REGULATED ASBESTOS CONTAINING MATERIAL HANDLING PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C



**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jaspman Road  
Edinburg, Texas 78542 USA

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

INTENDED FOR PERMITTING  
PURPOSES ONLY

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

July 2017  
Revised: November 2017

Project No. 1401491



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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.

Because of the movement of active disposal areas, a dedicated specific area or areas of the landfill to receive RACM cannot be effectively be defined. Therefore, the City by means of this application is providing written notification to the TCEQ that the entire permitted fillable area of the landfill will be considered as potential RACM disposal areas. An on-site map identifying areas for RACM disposal will be maintained at the facility and will be revised as needed to include additional constructed areas as potential disposal areas for RACM. RACM disposal locations will either be surveyed or located by the site grid location.

### **2.0 LANDFILL DISPOSAL**

#### **2.1 Notification of Delivery and Load Receipt**

30 TAC §330.171(c)(3)(D)

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

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

## **2.2 Load Inspection**

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

## **2.3 Disposal Location**

30 TAC §330.171(c)(3)(F)

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

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

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

## **2.4 Unloading Methods**

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

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

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

## 2.5 Cover Placement

30 TAC §330.171(c)(3)(G)

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

## 3.0 RECORD KEEPING

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

### 3.1 Manifests

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

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

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

### 3.2 Log or Site Map

30 TAC §330.171(c)(3)(B)

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

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

### 3.3 Monthly Waste Receipt Summary

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

### 3.4 Deed Recordation

30 TAC §330.171(c)(3)(C)

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

## 4.0 PERSONAL PROTECTIVE EQUIPMENT

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

### 4.1 Respirators

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

### 4.2 Personal Protective Equipment

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

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

## 5.0 EMPLOYEE TRAINING

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

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

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

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

## 6.0 CONTINGENCY PLAN

30 TAC §330.171(c)(3)(H)

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

## 6.1 Personal Protection

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

## 6.2 Notification

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

## 6.3 Emergency Cleanup Actions

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

## 6.4 Spill Response Equipment

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

**APPENDIX IVH  
SPECIAL WASTE ACCEPTANCE PLAN**



PERMIT AMENDMENT APPLICATION  
Part IV, Appendix H

# SPECIAL WASTE ACCEPTANCE PLAN

Edinburg Regional Disposal Facility

Edinburg, Hidalgo County, Texas

TCEQ Permit MSW-956C

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA



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

INTENDED FOR PERMITTING  
PURPOSES ONLY

July 2017  
Revised: November 2017

Project No. 1401491



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## 1.0 INTRODUCTION & PURPOSE

### 1.1 Objectives of Special Waste Acceptance Plan (SWAP)

This Special Waste Acceptance Plan (SWAP) outlines the process that will be used to review, evaluate, and determine acceptance of all TCEQ-defined special wastes for the facility. This SWAP was developed in accordance with 30 TAC §§330.127(5)(A) and 330.171. This preventive program specifically provides for waste pre-acceptance procedures to assure that a particular waste is nonhazardous and can be accepted and disposed pursuant to facility permit conditions, applicable regulations, and operating capabilities to ensure safe and environmentally sound management of the waste. The City has the authority to request any additional documentation, laboratory analysis, and waste sampling exceeding the requirements and guidelines of this SWAP to adequately characterize both waste-specific and site-specific wastes prior to pre-acceptance review. Upon review to determine if the waste is eligible for disposal at the landfill, the City may approve the acceptance of waste; however, the City is not obligated nor required to accept any waste.

It is important to note that this SWAP provides the “how to” of the process that will be used to review, evaluate, and determine acceptance of special wastes. This SWAP does not establish the “what” regarding which particular waste streams will or will not be accepted, as those are established elsewhere in the permit. The facility-specific waste streams that are allowed to be accepted are identified in the Part II, Waste Acceptance Plan. In addition to municipal solid waste (MSW), other solid wastes authorized to be accepted include Class 2 and Class 3 non-hazardous industrial solid waste, special waste, and other waste as approved by the TCEQ. The prohibited wastes that shall not be accepted are identified in Part II, Waste Acceptance Plan.

With respect to several major categories of waste streams, the following is noted here for emphasis:

- Regulated hazardous waste will not be accepted (however, household hazardous wastes and hazardous wastes from conditionally exempt small quantity generators are permissible); and
- Class 1 nonhazardous industrial waste (Class 1 waste) as defined in 30 TAC 330.3 (21) will not be accepted (however, solid waste classified as Class 1 waste only because of asbestos content is permissible).

TCEQ Guidance Documents included in Appendix IVH-3 for acceptance and disposal of wastes are as follows:

- RG-003 - Disposal of Special Wastes Associated with the Development of Oil, Gas, and Geothermal Resources
- RG-022 - Guidelines for the Classification & Coding of Industrial & Hazardous Waste
- RG-029 - Special Waste Regulations in Texas
- RG-486 - Disposal of Exempt Waste That Contains Radioactive Material

The remainder of this SWAP describes the procedures that will be in place and used to evaluate, approve and accept special waste for disposal at the facility.

## 1.2 Special Waste Definitions

30 TAC §330.3(148)

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, special waste may pose a present or potential danger to the human health or the environment. Special wastes are as defined by 30 TAC §330.3(148) and include the following:

**Table IVH-1: Special Waste Definitions**

Special Waste	Citation
Hazardous waste from conditionally exempt small-quantity generators that may be exempt from full controls under 30 TAC §335, Subchapter N	30 TAC §330.3(148)(A)
Class 1 industrial nonhazardous waste	30 TAC §330.3(148)(B)
Untreated medical waste	30 TAC §330.3(148)(C)
Municipal wastewater treatment plant sludges, other types of domestic sewage treatment plant sludges, and water-supply treatment plant sludges	30 TAC §330.3(148)(D)
Septic tank pumpings	30 TAC §330.3(148)(E)
Grease and grit trap wastes	30 TAC §330.3(148)(F)
Wastes from commercial or industrial wastewater treatment plants; air pollution control facilities; and tanks, drums, or containers used for shipping or storing any material that has been listed as a hazardous constituent in 40 CFR Part 261, Appendix VIII but has not been listed as a commercial chemical product in 40 CFR §261.33(e) or (f)	30 TAC §330.3(148)(G)
Slaughterhouse wastes	30 TAC §330.3(148)(H)
Dead animals	30 TAC §330.3(148)(I)
Drugs, contaminated foods, or contaminated beverages, other than those contained in normal household waste	30 TAC §330.3(148)(J)
Pesticide (insecticide, herbicide, fungicide, or rodenticide) containers	30 TAC §330.3(148)(K)
Discarded materials containing asbestos	30 TAC §330.3(148)(L)
Incinerator ash	30 TAC §330.3(148)(M)
Soil contaminated by petroleum products, crude oils, or chemicals in concentrations of greater than 1,500 milligrams per kilogram total petroleum hydrocarbons; or contaminated by constituents of concern that exceed the concentrations listed in Table 1 of 30 TAC §335.521(a)(1)	30 TAC §330.3(148)(N)
Used oil	30 TAC §330.3(148)(O)
Waste from oil, gas, and geothermal activities subject to regulation by the Railroad Commission of Texas when those wastes are to be processed, treated, or disposed of at a solid waste management facility authorized under this chapter	30 TAC §330.3(148)(P)

Special Waste	Citation
Waste generated outside the boundaries of Texas that contains any industrial waste; any waste associated with oil, gas, and geothermal exploration, production, or development activities; or any item listed as a special waste	30 TAC §330.3(148)(Q)
Lead acid storage batteries	30 TAC §330.3(148)(R)
Used-oil filters from internal combustion engines	30 TAC §330.3(148)(S)

### 1.3 Prohibited Wastes

30 TAC §330.15(e)

The following waste as identified in 30 TAC §330.15(e) are prohibited and will not be accepted at the facility:

**Table IVH-2: Prohibited Wastes**

Special Waste	Citation
A lead acid storage battery shall not be intentionally or knowingly offered by a generator or transporter for disposal at an MSW landfill or incinerator, and/or shall not be intentionally or knowingly accepted for disposal.	30 TAC §330.15(e)(1)
Do-it-yourself used motor vehicle oil shall not be intentionally or knowingly offered by a generator or transporter for disposal at an MSW landfill or MSW incinerator, either by itself or mixed with other solid waste, and/or shall not be intentionally or knowingly accepted for disposal. It is an exception if the mixing/commingling is incidental to, and the unavoidable result of, the mechanical shredding of motor vehicles, appliances, or other items of scrap, used, or obsolete metals.	30 TAC §330.15(e)(2)
Used oil filters from internal combustion engines will not be intentionally or knowingly accepted for disposal at this facility except as provided in 30 TAC §330.171(d).	30 TAC §330.15(e)(3)
Whole used or scrap tires will not be intentionally or knowingly accepted for disposal unless processed prior to disposal in a manner acceptable to the TCEQ or otherwise approved by the agency (e.g., variance). Scrap tires identified during landfill operations and generated through maintenance will be accumulated on site by placing them in containers or trailers prior to shipment. The total quantity of tires will not exceed 500 scrap tires (or weight equivalent tire pieces) on the ground, or 2,000 scrap tires in containers. Tire containers will be kept on landfill property, but the location of the containers will vary to allow operational flexibility, ease of access, and safe landfill operations. Tires and tire pieces stored outside of buildings at the site will be monitored for vectors at least once every two weeks. Manifests will be used for shipment of scrap tires offsite.	30 TAC §330.15(e)(4)
Refrigerators, freezers, air conditioners, and any other items containing chlorinated fluorocarbons (CFC) will not be knowingly accepted for disposal unless all the CFC contained in that item is captured and sent to an approved CFC disposal site or recycling facility. If the CFC is not removed from the item, then the whole item must be sent to an approved CFC disposal site. Such items that enter the facility with ruptured lines or holes in the CFC unit will not be accepted unless the generator or transporter	30 TAC §330.15(e)(5)

Special Waste	Citation
provides written certification that the CFC has been evacuated from the unit and that it was not knowingly allowed to escape into the atmosphere.	
Liquids Restrictions. The following wastes are prohibited from disposal: (a) Bulk or non-containerized liquid waste will not be accepted for disposal unless the waste is household waste other than septic waste. (b) Containers holding liquid waste shall not be accepted for disposal unless: (i) The container is a small container similar in size to that normally found in household waste; (ii) The container is designated to hold liquids for use other than storage; or (iii) The waste is household waste.	30 TAC §330.15(e)(6)
Regulated hazardous waste as defined in 30 TAC §330.3.	30 TAC §330.15(e)(7)
Polychlorinated biphenyls (PCB) wastes, as defined under 40 Code of Federal Regulations Part 761.	30 TAC §330.15(e)(8)
Radioactive materials as defined in 30 TAC §336, except as authorized in 30 TAC §336 or that are subject to an exemption of the Department of State Health Services.	30 TAC §330.15(e)(9)

#### 1.4 Wastes Not Requiring Prior Written Approval

30 TAC §§330.171(c), 330.171(d), 330.173(c), 330.173 (i), & 330.173(j)

Receipt of the following wastes does not require the waste-specific or site-specific review detailed in the §2.0 Special Waste Evaluation Program of this SWAP. Specifically, the wastes identified in Table IVH-3, Wastes Not Requiring Prior Written Approval will be accepted for disposal at the facility without the necessity for any waste-specific or site-specific approvals. They will be managed at the facility in accordance with the techniques set forth in 30 TAC §§330.171(c), 330.171(d), 330.173(c), 330.173 (i), & 330.173(j) and this SWAP, including the waste handling and disposal criteria identified in Appendix IVH-1, Waste-Specific Special Waste Management Procedures.

Appendix IVH-1, Waste Specific Special Waste Management Procedures provides a concise description of the waste-specific management procedures for the categories of special waste specifically identified in 30 TAC §330.3(148) as well as for other categories of solid waste mentioned in 30 TAC §§330.171, 330.173 and 330.15(e). The intent of Appendix IVH-1, Waste Specific Special Waste Management Procedures is to provide a user-friendly format to readily identify common categories of special waste and other solid waste and the requirements that apply for its acceptance process and management. Specifically, the second row of each table entry on Appendix IVH-1 (entitled "Evaluation Method") indicates whether each given special waste category requires prior written waste-specific or site-specific authorization before disposal, or not. It also indicates whether the Special Waste Evaluation Program described in §2.0, Special

Waste Evaluation Program of this SWAP is applicable to each listed special waste or other solid waste category.

**Table IVH-3: Special Waste Not Requiring Prior Written Approval**

Category of Special Waste	Citation
Medical wastes that have not been treated in accordance with the procedures specified in 30 TAC §326 (only if authorized by the Executive Director when a situation exists that requires disposal of untreated medical wastes in order to protect the human health and the environment from the effects of a natural or man-made disaster).	30 TAC §330.171(c)(1)
Dead animals and/or slaughterhouse waste.	30 TAC §330.171(c)(2)
Regulated asbestos-containing material (RACM) as defined in 40 CFR §61.	30 TAC §330.171(c)(3)
Nonregulated asbestos-containing materials (non-RACM)	30 TAC §330.171(c)(4)
Empty containers that have been used for pesticides, herbicides, fungicides, or rodenticides.	30 TAC §330.171(c)(5)
Municipal hazardous waste from a conditionally exempt small quantity generator (CESQG), provided the amount of waste does not exceed 220 pounds (100 kilograms) per month per generator.	30 TAC §330.171(c)(6)
Sludge, grease trap waste, grit trap waste, or liquid wastes from municipal sources (only if the material has been, or is to be, treated or processed and the treated/processed material passes the Paint Filter Liquids Test and is certified to contain no free liquids; it may be accepted for on-site processing/solidification at the liquid waste stabilization area prior to disposal).	30 TAC §330.171(c)(7)
Used oil filters from internal combustion engines (only if properly crushed/processed and offered for disposal by a household generator).	30 TAC §330.171(d)
Wastes that are Class 1 only because of asbestos content.	30 TAC §330.173(c)
Class 2 industrial solid waste that does not interfere with facility operation.	30 TAC §330.173(i)
Class 3 industrial solid waste that does not interfere with facility operation.	30 TAC §330.173(j)

### 1.5 Waste-Specific and/or Site-Specific Waste Acceptance

30 TAC §§330.171(b), 330.171(b)(1), & 330.171(b)(6)

The acceptance of a special waste as defined in §1.2, Special Waste Definitions and Table IVH-1, Special Waste Definitions, excluding those special wastes identified in §1.3, Prohibited Wastes and Table IVH-2, Prohibited Wastes, and any special wastes that are not specifically identified in §1.4, Wastes Not Requiring Prior Written Approval will require prior written approval from the TCEQ's Executive Director (or authorized designee). Such approvals for acceptance and/or disposal of special waste will be waste-specific and/or site-specific. The TCEQ may revoke an authorization to accept a particular special waste if the City does not maintain compliance with these rules or conditions imposed in the authorization to accept special waste.

## 2.0 SPECIAL WASTE EVALUATION PROGRAM

### 2.1 Overview

The Special Waste Evaluation Program (SWEP) obligations described in this section of the SWAP are not applicable to the acceptance of municipal solid waste or any special waste or other materials authorized for disposal under 30 TAC §330.171(c)-(d) and §330.173(c) and (i)-(j) as discussed in §1.4, Wastes Not Requiring Prior Written Approval and Table IVH-3, Wastes Not Requiring Prior Written Approval.

In accordance with 30 TAC §§330.15, 330.127(5)(A), §§330.171-330.173, and §§335.503-335.505, the City has developed this SWEP program to prevent the receipt of hazardous waste, PCB waste, unauthorized Class 1 waste, and other prohibited wastes at the landfill. This proactive policy, in conjunction with random inspections on incoming loads, minimizes the potential that hazardous or otherwise unacceptable waste will be transported to the site for disposal. Implementation of the program provides protection from the potential dangers that a particular special waste could pose to employees, the public, or the environment through improper management and serves as a screening mechanism that minimizes the potential of these prohibited waste streams entering the landfill.

### 2.2 Request for Approval to Accept Other Types of Special Waste

30 TAC §§330.171(b)(2) & 330.171b(5)

Other categories or types of special waste that are not identified in Appendix IVH-1, Waste Specific Special Waste Management Procedures must receive prior written waste-specific and/or site-specific approvals from the TCEQ's Executive Director prior to acceptance. The TCEQ may authorize the receipt of such other special waste with a written concurrence from the City; however, the City is not required to accept the waste.

After the TCEQ's written approval has been received for a particular "other" type of special waste, the subsequent acceptance review process for the same type of special waste will follow this SWEP. Handling and disposal of each particular "other" type of special waste authorized for acceptance by the TCEQ will be in accordance with the conditions included in the TCEQ authorization for that type of waste.

Requests for approval to accept special wastes must be submitted by the generator to the TCEQ or to the facility with an approved plan and must include, but are not limited to, the following:

#### 2.2.1 Special Waste Characteristics

30 TAC §330.171(b)(2)(A)

A complete description of the chemical and physical characteristics are required including laboratory analyses and information about a waste and the process which generates that waste as discussed in §3.0,

Analytical Information of this SWAP. The description must also include a statement as whether or not the waste is a Class 1 industrial waste as defined in 30 TAC §330.3 and the quantity and rate at which each waste is produced and/or the expected frequency of disposal.

### **2.2.2 Hazardous Waste Determination and Class 1 Waste Determination**

30 TAC §330.171(b)(2)(B)

In addition to a Class 1 determination pursuant to 30 TAC §335.505, a hazardous waste determination pursuant to 30 TAC §335.504 as required by 30 TAC §335.6(c) will be performed for the special wastes offered for disposal at the landfill. Regulated hazardous waste (excluding household hazardous waste and hazardous wastes from conditionally exempt small quantity generators) and Class 1 industrial wastes (except wastes that are Class 1 only because of their asbestos content) are prohibited for acceptance. Records of determination will be maintained in the SOR either electronically and/or in hardcopy format as discussed in §5.0, Documentation and Recordkeeping of this SWAP and will be made available for review at the request of TCEQ.

### **2.2.3 Handling Procedures**

30 TAC §330.171(b)(2)(C)

An operational plan containing the proposed procedures for handling waste and listing required protective equipment for operating personnel and on-site emergency equipment is required to accompany the request. Handling and disposal of the special waste authorized for acceptance by the TCEQ will be in accordance with the conditions included in the TCEQ authorization for that type of waste.

### **2.2.4 Contingency Plan**

30 TAC §330.171(b)(2)(D)

A contingency plan outlining responsibility for containment and cleanup of any accidental spills occurring during the delivery and/or disposal operation is required to accompany the request. The contingency plan will be implemented for the containment and cleanup of any accidental spill of the waste.

## **2.3 Special Waste Acceptance Process**

Prior to acceptance of any waste for disposal, information provided by the generator is screened to determine if the wastes meet the definition of "Special Waste." Should any waste be identified as a special waste the customer is required to state the characteristics and origin of the special waste proposed for disposal, if not already provided. In addition, if the waste is not readily identifiable, the generator will be required to provide other pertinent information regarding the waste that might aid in its identification. The following process is completed before waste is accepted:

- The generator provides documentation of the nature of the waste stream to the landfill by submitting the Generator's Waste Profile (GWP) and the waste classification checklist provided in TCEQ's RG-022, Guidelines for the Classification and Coding of industrial and Hazardous Wastes, and any required laboratory analyses data to support classification. Submittals which may be electronic or hardcopy in form or other similar documentation (an example Generator Waste Profile Form that may be used is provided in Appendix H-2). The customer may be required to provide laboratory analyses data for the waste stream intended for disposal. If the generator is an industrial facility that is required to have specific waste codes assigned, whether self-assigned, TCEQ-assigned, or EPA-assigned, documentation used to assign the waste classifications must be provided for review. Dependent on the waste stream, sufficient documentation may be available in the GWP. Form documents for submittal are:
  - Appendix H-2, GWP
  - Appendix H-3, RG-022
- The Director of Solid Waste Management (DSWM) or designee will review the electronic or hardcopy GWP and all information provided by the generator. This process may include an electronic review of certain standardized (express) profiles. The DSWM or designee implements the Special Waste Acceptance Plan including the review and approval for the acceptance of special waste.

Pre-acceptance review will ensure that the analytical information when applicable meets the requirements, TCEQ approval is given when appropriate, the necessary conditions/limitations on managing the waste are assigned, and if the waste is eligible for disposal at the landfill. If the waste is deemed eligible, an approval is granted, an expiration date is assigned, and all information is routed to the designated customer service representative. The customer will be informed of all conditions/limitations that apply to managing the special waste. The customer must comply with all conditions/limitations specified by the City.

### 3.0 ANALYTICAL INFORMATION

The laboratory analyses that will be required for review is dependent upon the type of waste stream to be disposed. Analytical data used to make a determination regarding a waste will use an EPA or TCEQ approved methodology and laboratory. Proper analytical results or equivalent information (i.e., 40 CFR §262.11 allows generator's knowledge of the waste and process generating the waste) must be obtained to ensure that the facility is not managing hazardous waste or other prohibited wastes. The generator is responsible for ensuring that a sample is representative of the waste stream and is analyzed in accordance with the appropriate methodology and laboratory prior to submitting the data for review.

Information about a waste and the process which generates that waste will be used to evaluate or assist in the evaluation of a special waste. Examples of such information include, but are not limited to, Material Safety Data Sheets (MSDS), manufacturers' literature, analytical results (e.g., an analysis may demonstrate that the potential constituents of concern are not present in the waste and therefore could not leach above the levels of concern), knowledge of how the waste was generated (e.g., a filter was used in painting

operations and therefore does not contain any pesticides), and other such information generated in conjunction with a particular waste generation activity or process.

- When using "process knowledge" to address one or more special waste evaluation criteria, the requirements of 30 TAC §335.511 shall be followed.
- In addition to above, all information that is used to evaluate special wastes shall be documented in accordance with 30 TAC §335.513.

Analytical reports and/or sampling documentation must clearly identify the generator and/or customer, description of the material sampled and analyzed, sample collection date and location, and when analyses were conducted.

The reference of methods employed must accompany the analytical data and be EPA/TCEQ approved method(s), as applicable. Laboratory QA/QC information must accompany the data submitted and may include sample handling, containerization and preservation techniques, chain of custody records, data on standards, duplicate analyses, spikes and blanks, and other pertinent statistical information.

Special waste that is delivered to the facility for disposal will receive a visual QA/QC inspection to verify contents and nature of waste. This inspection will take place either at the gatehouse or at the working face while the waste is being unloaded by personnel trained in prohibited waste identification. Should visual inspection detect unusual characteristics, additional QA/QC will be performed or the load will be rejected.

Waste containing free liquids as determined using the Paint Filter Liquids Test (EPA Method 9095: Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, EPA Publication No. SW-846) will not be accepted for direct disposal unless it is: (i) bulk or noncontainerized liquid waste that is household waste other than septic waste, or leachate or gas condensate derived from the facility and managed/disposed of in accordance with the Part III, Site Development Plan or (ii) containerized liquid waste that is in a small container similar in size to that normally found in household waste, in a container that is designed to hold liquids for use other than storage, or that is household waste. Other than these exceptions, if a waste contains free liquids or is otherwise not certified as passing the Paint Filter Test, it will not be accepted for direct disposal, but is allowed to be accepted for on-site solidification/processing, provided that the waste is an approved waste stream and that it is processed in accordance with the approved operational procedures included in §8.2.2, On-Site Liquid Waste Processing of this SWAP.

#### **4.0 WASTE APPROVAL UPDATES**

The GWP for special wastes will be assigned an expiration date not to exceed three years unless otherwise required or approved by the TCEQ. The City of Edinburg requires the generator/customer to provide notification and additional process and/or chemical analysis data in the event there are changes in the process from which the waste is produced. At a minimum, all special waste streams approved and accepted

for disposal will be reevaluated prior to the expiration date or if the generator submits additional information after a process change, to include an electronic review if there is no change in process or additional information. Updated analytical data for representative samples collected within recent year may be requested but may not be required for the renewal if the generator certifies that there has not been a change in process.

## **5.0 DOCUMENTATION AND RECORDKEEPING**

Shipping documentation for profiled wastes that arrive at Edinburg Regional Disposal Facility for management is provided to the facility upon arrival. Waste specific information included in the GWP, including any special handling or other requirements is also made available to the facility, hard copy and/or electronically. If the waste and associated documentation is missing, incomplete, or the characteristics of the waste are questionable, all discrepancies must be resolved prior to acceptance of the waste, as outlined in §6.0, Waste Discrepancies and Rejected Loads of this SWAP. All necessary and required paperwork relating to the acceptance of special waste will be maintained in the site operating record either electronically and/or in hardcopy format, and will be furnished upon request to the TCEQ Executive Director and must be made available for inspection/review by the TCEQ Executive Director. Refer to Appendix IVH-2, Example Generator Waste Profile (GWP) Form for an example of a GWP. As the result of potential future revisions, the format and/or information contained in the GWP may change.

## **6.0 WASTE DISCREPANCIES AND REJECTED LOADS**

Gatehouse personnel screen all industrial generators to ensure that all special waste represented by the GWP has been identified and that all required paperwork, approvals, and documentation are in place. If any associated documentation is missing, incomplete, or the characteristics of the waste are questionable, all discrepancies must be resolved prior to acceptance of the waste. In the event the discrepancies cannot be resolved, the waste load will be rejected. All waste discrepancies must be resolved before a waste can be accepted for disposal.

In the event that the description or physical characteristics of a waste being received at the facility differs from that of an approved waste stream or if previously unidentified waste is suspected, the load will be stopped and the generator/customer will be asked to provide additional process knowledge and/or chemical analysis data in order to determine the proper identity of the waste. That information will be reviewed and approved by the facility, the Director of Solid Waste Management (DSWM), or their designee for acceptance or rejection, depending on the nature of the discrepancy (e.g. administrative versus waste composition issues). Copies of the discrepancy resolution, including updated or missing documentation, will be maintained by the site in accordance with §5.0, Documentation and Recordkeeping of this SWAP.

Should an incident occur where hazardous waste, PCB wastes, radioactive or other prohibited wastes are suspected or discovered, the waste will not be authorized for disposal but will instead be rejected or isolated

until the material can be adequately identified to determine the proper disposition/remediation of the material and the appropriate handling procedures. During this identification process, the generator/customer will be contacted to determine the identity of the material. If the material is determined to be hazardous waste or contain regulated levels of PCB or radioactive material, the TCEQ will be notified of the incident and the planned disposition/remediation of the material. The proper disposition/remediation of the prohibited hazardous, PCB, or radioactive waste will be specific to the waste and will be implemented upon TCEQ concurrence and approval.

## **7.0 TRAINING OF PERSONNEL AND WASTE SCREENING**

In addition to the implementation of this SWAP, which provides for specific and detailed pre-acceptance procedures to prevent the receipt of hazardous waste, PCBs, and other prohibited wastes, appropriate facility personnel will receive training to recognize potential hazardous waste, PCBs, or other prohibited wastes. The City provides in-house training to key site personnel, gatehouse personnel and field personnel. This in-house training is function specific and may include Subtitle D requirements, state specific requirements, regulations and procedures, waste recognition and/or waste screening requirements and procedures for acceptable and unacceptable wastes, definition and identification of special wastes, hazardous waste, PCB wastes or other prohibited waste, and the requirements and procedures of this SWAP. Appropriate landfill operations personnel will be trained in the proper use of PPE and on-site emergency equipment. Proper PPE includes a work uniform, work boots, and safety vest. Additional PPE may include Tyvek (or equivalent) suit or coveralls, hardhat, hearing protection, gloves, and safety glasses as conditions warrant. Documentation and a record of all training provided to key facility personnel will be maintained on site in the site operating record and available for inspection.

This required training allows for the monitoring of waste streams as they enter the facility, as well as during disposal, under the supervision of properly trained site personnel. Upon arrival at the site, appropriate gatehouse personnel screen all industrial customers to ensure that all special waste represented by the GWP has been identified and that all required paperwork, approvals, and documentation are in place. In the event that the description or physical characteristics of a waste being received at the landfill differ from that of an approved waste stream, or if a previously unidentified waste is suspected, the load will be stopped and the generator will be required to provide additional process and/or chemical analysis data in order to determine the proper identity of the waste. Upon arrival at the working face and during the unloading of an industrial customer's waste, appropriate field personnel screen the waste for signs of any waste that may exhibit signs of being hazardous or otherwise prohibited waste.

Household hazardous wastes are exempt from regulation under 40 CFR 261.4(b)(1) and under 30 TAC §335.401-335.419. Notwithstanding this exemption, shipments of residential waste can be screened and visually monitored for hazardous wastes other than those contained in normal household waste upon arrival

at the gatehouse and during unloading at the working face or citizen's collection station by the appropriate gatehouse and field personnel.

During the waste screening process by the appropriate field and gatehouse personnel, items to consider and look for may include the type of transport vehicle, signs of liquids or leaking liquids, strange odors, non-household size containers, smoke, vapors, unusual color or content, unusual compaction, excessive liquids, powders or abnormal products, unusual or prohibited signage or labeling, and body language of driver (i.e., suspicious or nervous appearance or actions).

Should an incident occur where hazardous waste, PCB waste prohibited from Subtitle D land disposal, or other prohibited wastes are suspected or discovered, the waste will not be authorized for disposal but will instead be isolated until the material can be adequately identified to determine the proper disposition/remediation of the material and the appropriate handling procedures. During this identification process, the facility will make a reasonable attempt to determine the identity of the generator of the material.

If the generator is identified, they will be contacted to determine the identity of the material. If the material is determined to be a non-acceptable waste for the facility, the waste will be returned to the generator for proper disposal. The proper disposition/remediation of the prohibited waste will be specific to the waste.

If the generator cannot be identified, the facility will take reasonable steps to determine the identity of the material. If the material is determined to be a hazardous waste, PCB waste, or other prohibited material, the TCEQ will be notified of the incident and the planned disposition/remediation of the material. The facility will make the necessary arrangements for proper disposition/remediation of the waste.

## **8.0 OPERATIONAL PROCEDURES**

### **8.1 Arrival Acceptance Procedures**

Special waste delivered to the landfill for disposal will be checked against the pre-acceptance information to match the contents and nature of waste. The gate attendant will monitor the loads by observing the vehicle, and/or inspecting the load, and/or questioning the driver concerning the origin of the waste. Additional QA/QC may include pH testing, ignitability testing, and paint filter testing. If conducted, QA/QC results will be recorded and referenced by manifest document number and maintained in the site operating records. Wastes requiring special handling are diverted to the appropriate special management area.

### **8.2 Special Waste Handling Procedures**

#### **8.2.1 General**

Special wastes approved for receipt at this facility and accepted in accordance with the procedures described in the SWAP will be managed in accordance with the handling and disposal criteria provisions

applicable to that waste as presented in Appendix IVH-1, Waste Specific Special Waste Management Procedures. In general, special wastes will be handled and disposed of at the site in a similar manner as municipal solid waste. The special waste will off-loaded from transport trucks and disposed of at the appropriate unloading area/working face identified in the SOP based on how the waste is classified (e.g., MSW working face, regulated asbestos-containing material (RACM) disposal area, liquids stabilization area). The special waste will then be placed and spread using standard landfill equipment listed in the SOP. Specific handling/disposal procedures for certain wastes will be in accordance with the TCEQ regulations governing their proper disposal and as described further in Appendix IVH-1, Waste Specific Special Waste Management Procedures of this SWAP. For emphasis, the subsections below identify wastes of a certain type or composition that require specific handling and disposal procedures.

### **8.2.2 On-Site Liquid Waste Processing**

30 TAC §330.171(b)(3)

The facility is authorized to perform on-site liquid waste processing. Liquid wastes will be directed to the on-site liquid stabilization processing area prior to being disposed of in the landfill.

### **8.2.3 Odorous Wastes and Potentially Dusty/Windblown Wastes**

The facility will follow the Odor Management Plan presented in §4.14, Odor Management Plan of the SOP. Wastes with strong odors (such as dead animals, slaughterhouse wastes, sewage sludges, etc.), will be covered immediately upon disposal. These wastes may be placed in a select area of the working face to facilitate covering them immediately. See Appendix IVH-1, Waste Specific Special Waste Management Procedures of this SWAP for specific cover requirements that apply to dead animals and slaughterhouse wastes.

Potentially dusty (or otherwise prone to becoming windblown/airborne) special wastes will be transported and unloaded so as to minimize the potential for airborne particles. This includes positioning windbreaks at the working face, placing the dusty/windblown-prone special waste in contingency trenches or requiring the generator to containerize the waste. If needed, personnel may be required to wear personal protective equipment (PPE).

### **8.2.4 Asbestos Waste (RACM)**

RACM will be managed, handled, and disposed of at the facility in accordance with the provisions and requirements of the Regulated Asbestos Containing Material Handling Plan (Appendix IVG of the SOP).

## **9.0 CONTINGENCY PROCEDURES**

For incidental spills that do not pose a threat to waters of the state, operations staff will contain and clean up the spill using appropriate equipment at the direction of the landfill manager. For solids, site staff will

use shovels, brooms, and/or heavy equipment to pick up spilled materials. For liquids, typical cleanup materials would include oil dry, absorbent pads, or other available materials to contain the spilled material. Spill cleanup kits are maintained on site. Pumps might also be used, when appropriate, to transfer liquid material from the spill area into containers.

For larger spills, or where there is potential for the waste to impact waters in the state, the landfill manager will assess the situation and determine the appropriate means to contain and collect the material. If spilled material threatens to impact storm water discharge from the site, the landfill manager will use booms or diversionary dikes, or excavate holes or pits as needed to contain the spilled material. Equipment typically available for spill response includes excavators, backhoes, dozers, pumps, and haul trucks. In the event of a spill that cannot be picked up using handheld tools, this equipment will be used as needed to contain and collect spilled material. For larger spills of liquid wastes that cannot be adequately cleaned up with on-site equipment, an emergency cleanup contractor or vacuum truck company will be contacted to assist with cleaning up the spill. Once the liquids are removed, a visual inspection of the spill area will be made, and soils observed to be potentially impacted will be over-excavated and disposed with the collected material.

**APPENDIX IVH-3  
TCEQ GUIDANCE DOCUMENTS**

**RG-003**

**DISPOSAL OF SPECIAL WASTES ASSOCIATED WITH THE DEVELOPMENT OF OIL, GAS, AND  
GEOTHERMAL RESOURCES**



# Disposal of Special Wastes Associated with the Development of Oil, Gas, and Geothermal Resources

This document provides recommendations for the management of special wastes associated with the exploration, development, or production of oil, gas, or geothermal resources that are regulated by the Railroad Commission of Texas (RRCT) and that are being disposed of in landfills permitted by the Municipal Solid Waste (MSW) Permits Section of the

Texas Commission on Environmental Quality (TCEQ) in accordance with Title 16, Texas Administrative Code, Section 3.30, and 30 TAC 330.3(148)(P). Some of the special wastes listed below require written authorization for disposal. Column 5 details the requirements for special waste disposal.

Description of Waste Items	RCRA Exempt per 40 CFR Part 261.4(b)(5) (see Note 1)	RRCT Authority Required for Disposal in TCEQ Landfill?	Treatment or Testing Recommended (see Note 2)	TCEQ Approval Required Prior to Disposal / Other Options
Asbestos-containing material	No Subject to specific regulations	Yes	Comply with Federal & State regulations for removal & disposal	No per §330.171(c)
Bags (empty), paper	No	No	None	No
Brush & vegetation from clearing land, uncontaminated	No	No	None	No / Disposal in Type IV landfill, compost facility
Buckets, detergent (empty)	No	No	None	No / Recycle
Buckets, grease (empty)	No	No	None	No / Recycle
Concrete, contaminated from compressor stations, oil, or gas facilities	No	Yes	Test for COCs on a case-by-case basis	Yes
Concrete, uncontaminated	No	No	None	No / Disposal in Type IV landfill
Containers (empty)	No	No	None	No / Recycle
Drill cuttings	Yes	Yes	Test for COCs on a case-by-case basis	Yes
Barrels, drums, 5-gallon buckets (empty)	No	No	None	No / Recycle
Fiberglass tanks & pipe (empty)	No	No	Clean, cut or shred	No
Filters—amine, dehydration, glycol	Yes	Yes	Drain, air dry for 48 hrs., test for TPH & benzene	Yes
Filters—cooling tower	Yes (No, if generated in transportation)	Yes	Drain, air dry for 48 hrs., test for chromium	Yes
Filters—saltwater	Yes	Yes	Drain, air dry for 48 hrs., test for pH, TPH, & chlorides	Yes
Filters— waste oil (1) entire unit is inside	No	Yes	Separate parts, recycle oil & metal parts	Yes

Description of Waste Items	RCRA Exempt per 40 CFR Part 261.4(b)(5) (see Note 1)	RRCT Authority Required for Disposal in TCEQ Landfill?	Treatment or Testing Recommended (see Note 2)	TCEQ Approval Required Prior to Disposal / Other Options
metal container				
(2) replaceable fiber or paper filter inside unit	No	Yes	Drain for at least 24 hrs., recycle, waste-to-energy, test for lead & benzene	Yes
Iron sponge	Yes	Yes	Allow to oxidize completely to prevent combustion	Yes
Office trash, routine	No	No	None	No / Recycle
Metal plates, pipes, cable	No	No	None	No / Recycle
Molecular sieves	Yes	Yes	Cool in non-hydrocarbon, inert atmosphere; hydrate in ambient air for 24 hrs., test for TPH & benzene	Yes
Muds—drilling	Yes	Yes	Test for barium, TPH, & BTEX; treatment to reduce hydrocarbons may be required	Yes
Muds—sacks of unused drilling mud	No	Yes	Return to vendor, use at other sites	Yes
Muds—unused additives	No	Yes	MSDS, test for barium	Yes
“Pigging waste” from gathering lines in primary field operations	Yes	Yes	MSDS for corrosion inhibitors, test for TPH, benzene, RCRA metals, & NORM	Yes
“Pigging waste” from transmission lines	No	Yes	MSDS for corrosion inhibitors, TPH, benzene, & arsenic	Yes
Pipe scale & other deposits removed from piping & equipment	Yes (No, if generated in transportation)	Yes	Test for TPH, RCRA metals, & NORM	Yes
Pipe dope, unused	No	Yes	MSDS (may contain lead), re-use if possible	Yes
Plastic pit liners	Yes	Yes	Decontaminate	No
Pumps, valves, etc.	No	No	Test for NORM	No / Recycle
Rags & gloves, soiled	No	No	None	No
Sand—produced during exploration	Yes	Yes	Test for TPH, benzene, & NORM	Yes
Soil—containing crude oil hydrocarbon	Yes (No, if generated in transportation)	Yes	Test for TPH & benzene	Yes
Soil—containing lube oil hydrocarbons	No	Yes	Test for cadmium, chromium, lead, TPH, benzene, PCBs	Yes
Sulfur—ferrous elemental sulfur & soil contaminated with sulfur	No	Yes	Recover sulfur	Yes
Sorbent pads—crude oil & other exempt wastes	Yes	Yes	Test for TPH & benzene	Yes
Sorbent pads—lube oil & other nonexempt wastes	No	Yes	Test for TPH & benzene	Yes
Tank seals—rubber	No	Yes	Allow to drain	Yes / Recycle

Description of Waste Items	RCRA Exempt per 40 CFR Part 261.4(b)(5) (see Note 1)	RRCT Authority Required for Disposal in TCEQ Landfill?	Treatment or Testing Recommended (see Note 2)	TCEQ Approval Required Prior to Disposal / Other Options
Tower packing	No	Yes	Test for chromium	Yes / Recycle
Water-treatment backwash solids	Yes	Yes	Test for RCRA metals & NORM	Yes
Wooden pallets, uncontaminated	No	No	None	No / Disposal in Type IV landfill

- The scope of the RCRA exemption for oil and gas wastes is limited to drilling fluid and cuttings, produced water, and other waste unique or intrinsic to exploration and production in "primary field operations." Guidance for determining whether an oil and gas waste is exempt or nonexempt, including the definition of "primary field operations," is available in the Railroad Commission's manual, *Interim Guidance for Statewide Rule 98* (available online at <[www.rrc.state.tx.us/divisions/og/swr98/index.html](http://www.rrc.state.tx.us/divisions/og/swr98/index.html)>). Oil and gas waste is always nonexempt when generated in transportation operations (i.e., downstream of primary field operations).
- A less expensive alternative to the toxicity characteristic leaching procedure (TCLP) analysis is a total constituent analysis. If a total (i.e., total lead, total benzene, etc.) exceeds the example limits listed below or exceeds 20 times the TCLP limit for a Class 2-like waste, then the TCLP must be performed and the TCLP results must not exceed the stated limits for disposal in a standard MSW Type I landfill unit. For TCLP results that exceed the example limits listed below but do not exceed a hazardous limit, the waste may be authorized for disposal into an MSW Type I landfill with a Class 1 industrial waste unit. More TCLP limits can be found on Table 1, Appendix 1 of 30 TAC 335 Subchapter R:

Constituent	Total Limit (mg/kg)	MSW Type I TCLP Limit (mg/L)	Hazardous Waste TCLP Limit (mg/L)
Benzene	10	0.5	0.5
Arsenic	36	1.8	5.0
Barium	2,000	100	100
Cadmium	10	0.5	1.0
Chromium	100	5.0	5.0
Lead	30	1.5	5.0
Mercury	4	0.2	0.2
Selenium	20	1.0	1.0
Silver	100	5.0	5.0

There are additional constituent analyses that can limit the options for disposal into an MSW Type I landfill unit:

- TPH < 1,500 mg/kg may be disposed of in a standard MSW Type I landfill unit.
- TPH ≥ 1,500 mg/kg may be disposed of in an MSW Type I landfill with a Class 1 industrial unit as specified in 30 TAC 330.171(b)(4).
- PCBs ≥ 50 mg/kg may not be disposed of in an MSW Type I landfill unit, unless authorized by the USEPA as specified in 40 Code of Federal Regulations Part 761.
- NORM concentrations must be below 30 picocuries per gram for disposal in an MSW Type I landfill unit as specified in 25 TAC 289.259(d)(1)(A).

## Explanation of Acronyms:

BTEX benzene, toluene, ethylbenzene, and xylene

COC constituents of concern

MSDS material safety data sheet

MSW municipal solid waste

NORM naturally occurring radioactive materials

PCBs polychlorinated biphenyls

RCRA Resource Conservation and Recovery Act

RRCT Railroad Commission of Texas

TCEQ Texas Commission on Environmental Quality

TCLP Toxicity Characteristic Leaching Procedure

TPH total petroleum hydrocarbons

## Regulatory References:

16 TAC 3.30

30 TAC 330.3(148) and 330.171

30 TAC 335.505(1) and 335.521(a)(1)

40 CFR 261.4(b)(5)

**RG-022**

**GUIDELINES FOR THE CLASSIFICATION & CODING OF INDUSTRIAL & HAZARDOUS WASTE**

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GUIDELINES

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FOR THE

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CLASSIFICATION

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AND

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CODING

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OF

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INDUSTRIAL

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AND

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HAZARDOUS WASTES

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TEXAS COMMISSION ON  
ENVIRONMENTAL QUALITY

WASTE PERMITS DIVISION

RG-022 Revised 11/14



# GUIDELINES FOR THE CLASSIFICATION AND CODING OF INDUSTRIAL AND HAZARDOUS WASTES

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THIS IS A GUIDANCE DOCUMENT AND SHOULD NOT BE  
INTERPRETED AS A REPLACEMENT TO THE RULES.

The rules for classifying and coding industrial wastes and  
hazardous wastes may be found in 30 Texas Administrative  
Code (TAC) Sections (§§) 335.501-.521 (Subchapter R).

Prepared by:

I&HW Permits Section, MC 130  
Waste Permits Division  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

RG-022

Texas Commission on Environmental Quality



**Bryan W. Shaw, Ph.D., P.E.,** *Chairman*  
**Toby Baker,** *Commissioner*  
**Zak Covar,** *Commissioner*

**Richard A. Hyde, P.E.,** *Executive Director*

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Published and distributed  
by the  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

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# Introduction

## Who Should Read This Booklet

The main purpose of this guidance document is to help generators of industrial and hazardous waste follow state and federal requirements on

- classifying and coding these wastes,
- keeping proper records, and
- notifying the Texas Commission on Environmental Quality (TCEQ) about the wastes, when required.

Specifically, this document gives guidance on the regulations in Title 30 of the Texas Administrative Code (TAC), Chapter 335, Subchapter R (Waste Classification). The rules in Subchapter R apply both to wastes generated in Texas and to those generated outside the state and sent to Texas for treatment, storage, and/or disposal. Correct and timely compliance with the regulations on industrial and hazardous wastes helps to protect the state's environment and safeguard the health of Texas citizens.

## Waste Classes

Figure 1-1 shows the main categories of hazardous and nonhazardous waste. The following paragraphs give brief descriptions of these categories—important terms that will be used throughout this booklet. (For more details, see the classification checklist in Chapter 3 and the definitions in Chapter 8.)

### Hazardous Waste

A hazardous waste is one that is listed as such by the U.S. Environmental Protection Agency (EPA) or that exhibits one or more hazardous characteristics (also as specified by the EPA). Hazardous wastes are threatening to human health and the environment.

### Listed Hazardous Waste

EPA lists over 400 wastes as hazardous. For more information see Part I-A of the checklist in Chapter 3.

### Characteristically Hazardous Waste

Waste that displays one or more of four hazardous characteristics:

- ignitability (easily flammable—for example, solvents);
- reactivity (capable of rapid chemical reaction—for example, peroxides);

- corrosivity (highly acidic or alkaline, able to dissolve metals or burn the skin—for example, hydrochloric acid or sodium hydroxide); and
- toxicity (a waste that can release toxic constituents into the environment—for example, lead-based paint).

For more information on hazardous characteristics, see Part I-B of the checklist in Chapter 3.

### Nonhazardous Waste

Any industrial waste that is not listed as hazardous and does not have hazardous characteristics.

(Class 1 nonhazardous industrial waste can include certain levels of constituents and specified properties that, at higher levels, might otherwise render the waste hazardous—see Part II of the checklist in Chapter 3.)

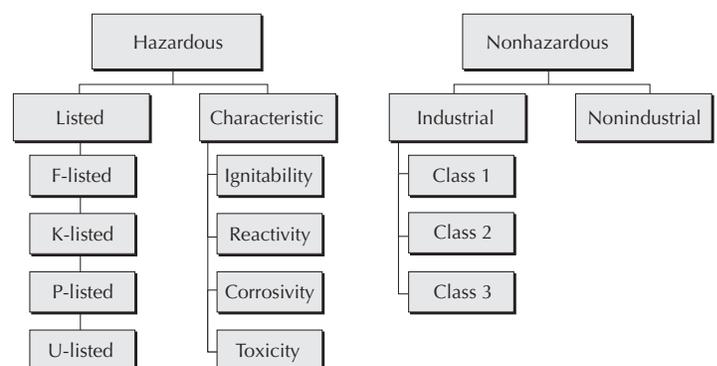
### Industrial versus Nonindustrial Wastes

*Industrial wastes* result from (or are incidental to) operations of industry, manufacturing, mining, or agriculture—for example, wastes from power generation plants, manufacturing facilities, and laboratories serving an industry. *Nonindustrial wastes*, by contrast, come from sources such as schools, hospitals, churches, dry cleaners, most service stations, and laboratories serving the public.

### Nonhazardous Industrial Waste

In this grouping, *Class 1* waste is considered potentially threatening to human health and the

Figure 1-1. Hazardous and Nonhazardous Wastes



environment if not properly managed, because of the constituents and properties this class can include. Therefore, there are special handling requirements for Class 1 wastes. An example is water contaminated with ethylene glycol.

Examples of *Class 2* wastes include waste-activated sludge from biological wastewater treatment. *Class 3* includes materials such as demolition debris—for example, bricks—that are insoluble, do not react with other materials, and do not decompose. Class 2 and 3 wastes are often accepted by local landfills. However, a Class 2 or 3 designation does not mean that the waste is incapable of causing harm in every management (or mismanagement) situation.

## What This Booklet Explains How to Do

After you have worked through this booklet (and that includes consulting the rules referred to in it), you will be able to accomplish the following tasks:

- **Identify which wastes you must classify, code, and notify** the TCEQ about. Chapter 2 introduces a key concept—“waste streams”—that helps you decide these points.
- **Classify your waste.** Chapter 3 gives you a step-by-step approach for putting your waste into one of four categories: either *hazardous* waste or *nonhazardous* industrial waste Classes 1, 2, or 3.
- Know what kind of information (either from **process knowledge** about your facility’s operation or from **analytical testing**) that you must **document** and keep on **file** (Chapter 4).
- **Understand the 8-character Texas waste code.** Chapter 5 explains the components of the waste code:
  - 4-character **sequence number** (may be a number, letters, or a combination; generally, identifies a particular waste or where it came from);
  - 3-digit **form** code; and
  - 1-character classification (from Chapter 3).
- **Know how to notify TCEQ** about your wastes and **which TCEQ form** to use (Chapter 6).

## Some Things This Booklet Does NOT Cover

**Nonhazardous Nonindustrial Waste.** The rules in 30 TAC Chapter 335, *do NOT* apply to **nonhazardous** waste generated by **nonindustrial** facilities.

### Selective Coverage of Chapter 335

Also, please be aware that this guidance document only covers 2 subchapters (A and R) of 30 TAC Chapter 335, which contains 18 subchapters in all. This booklet covers only classification and coding, documentation you must create and keep on file, and notifications you must send to TCEQ (and the forms to use for that purpose). This booklet is not a substitute for the complete rules themselves. (You can obtain your own copies of the full, official state rules from the TCEQ’s publications unit. Ways to contact this unit are listed under the heading “TCEQ and EPA Forms” in Chapter 6.)

### Classification versus Risk Reduction

There is an important distinction between (1) classifying your wastes; and (2) meeting the **risk reduction standards**, which are set forth in 30 TAC Chapter 335, Subchapter S. Here are the most common situations where the risk reduction standards apply:

- a facility that handled industrial wastes is being closed;
- a site where unauthorized discharge of wastes occurred is being cleaned up.

If you are involved in a situation like these, you need to inform yourself about the risk reduction standards. The guidance document you are now reading does not cover this topic. (Again, you can obtain a copy of Subchapter S, and other information, from the TCEQ publications unit—see the heading “TCEQ and EPA Forms” in Chapter 6.)

## Who Are “You” in This Booklet?

Throughout this guidance document, generators of industrial and/or hazardous wastes will be referred to as “generator,” “generators,” or—for a more direct way of writing—simply as “you.” Also, 30 TAC Chapter 335, Subchapter R, will be referred to as “these rules” or “the rules.” Finally, “this booklet,” “this document,” or “this guidance document” refers to *Guidelines for the Classification and Coding of Industrial and Hazardous Wastes*, TCEQ Publication Number RG-022—the booklet you are now reading.

# “Waste Streams”—A Key Concept

When the preceding chapter mentioned that this booklet will instruct you on how to classify, code and report about wastes, a question that naturally might have come to your mind is “*How* do I know which wastes must be classified, coded, and reported?” (The general answer is that you must perform these processes on all hazardous wastes and nonhazardous industrial wastes.)

In discussing this point, federal regulators use the term *waste stream*, in both of the following senses: First, it can mean the total flow of all waste from homes, businesses, and industry. Second, within this total flow, smaller “waste streams” can be distinguished—for example, “the residential waste stream,” “the recyclable waste stream,” and others.

Similarly, within the overall flow of waste from your ordinary operations or processes, a number of particular waste streams can be identified. For example if your process ordinarily produces a hazardous acidic waste, and at some point you neutralize that waste, these are two separately identifiable “waste streams.”

Each waste stream—the acidic waste and the neutralized waste, in this example—must be identified by an 8-character Texas waste code, which identifies the waste stream as a separate entity and gives information about its origin, general nature, and hazardous status. (Chapters 3 through 5 go into the details of how this 8-character code is arrived at.)

Table 2-1 gives examples of some situations in which the waste flow from an operation or process can produce more than one waste stream, each of which must be classified and coded; and an example of a situation that does *not* result in more than one waste stream. For specific guidance on specific waste streams, contact the TCEQ.

In general, whenever you have or suspect the existence of an additional, distinct waste stream, you must determine its classification (Chapter 3), arrive at a Texas waste code for it (Chapter 5), and in most cases notify TCEQ about the additional waste stream (Chapter 6—which also gives details about some of the exceptions to the requirements for notification: for example, a slight change or variation in a waste stream’s composition may not require notification.)

**Table 2-1. An Operation’s Overall Waste Flow Can Produce Multiple “Waste Streams”**

IF you have WASTES that are ...	AND they come from PROCESSES that are ...	THEN the wastes are considered ...
different	similar	<b>different</b> “waste streams”—for example, a sludge removed from an electroplating vat is not the same waste stream as a liquid removed from an electroplating vat.
similar	different	<b>different</b> “waste streams”—for example, methylene chloride used in a paint- stripping operation is not the same waste stream as methylene chloride used in laboratory analysis.
similar	similar	<b>the same</b> “waste stream”—for example, a site may have several paint booths that perform the same activities with the same materials, and each produces drop cloth waste. These drop cloth wastes, from the various locations at this site, could be considered one waste stream as long as they were all classified the same (for more on classification, see Chapter 3).
altered physically or chemically by treatment	N/A	<b>different</b> “waste streams”—for example, if a sludge is dewatered, it may produce two new waste streams, one a solid and the other a liquid.

# Waste Classification Checklist

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This chapter provides a checklist to help you classify your hazardous waste and your nonhazardous industrial waste. For an overview of these types of waste, refer back to Figure 1-1 in Chapter 1; for more details, refer to 30TAC Chapter 335 Subchapter R Sections 335.501–508. (You can obtain your own copy of state rules from the TCEQ publications unit; ways to contact this unit are listed under the heading “TCEQ and EPA Forms” in Chapter 6.)

## Process Knowledge vs. Analytical Testing

In determining a waste stream’s classification, a generator may use *process knowledge* and/or *analytical testing*. Process knowledge is the owner or operator’s knowledge about how the facility operates, how a waste was produced and handled, and other information based on operating experience. Analytical testing is information about a waste from laboratory analysis.

In the checklist, the nonhazardous classification criteria that could involve analytical testing have been marked with an \*. This marking **does not** mean that analytical testing is the only way to evaluate these criteria. If sufficient process knowledge is available, little or no analysis may need to be performed. You should evaluate whether you have enough process knowledge about the waste to classify it or whether analytical testing is needed.

## Documentation

Regardless of whether you rely on process knowledge or opt for analytical testing, you must fully document the information used in making your waste classification. **A completed checklist does not qualify as full documentation.** Documentation should be in a written and/or electronically stored format that is reasonably accessible and easily reproducible. For details on documentation requirements, see Chapter 4.

---

## Part I. Hazardous Waste Determination

All waste generators should work through Part I of this checklist. In this part you will determine whether your waste is hazardous because (a) it is listed as hazardous by EPA or (b) it displays characteristics that EPA says make it hazardous.

In federal regulatory language, the first step in classifying your waste is called “making a *hazardous waste determination*.” The definition of hazardous waste, based upon the Resource Conservation and Recovery Act (RCRA), is found in Title 40 of the Code of Federal Regulations (CFR), Part 261.

This TCEQ guidance document reflects the hazardous waste definition in the *Federal Register* as of July 1, 2004. If that definition changes, the generator is still responsible for making an accurate hazardous waste determination in accordance with the latest regulations—instead of with what is printed in this guidance document.

IF the answer to any of the questions in Part I is “Yes,”  
THEN the waste is hazardous.

## Possible Exclusions from Hazardous Classification

Under certain conditions, some types of wastes are excluded from being considered hazardous (40 CFR Sections 261.3–4). Generators may wish to review these exclusions before working through Part I of this checklist.

---

## Part I-A. *Listed Hazardous Waste Determination*

The EPA lists some 400 hazardous wastes.

### Information to Help You Make This Determination

Descriptions of listed waste are found in 40 CFR Part 261, Subpart D, Sections 261.31–33. These wastes are often referred to as follows:

- “F” listed waste (waste from nonspecific sources, Section 261.31);
- “K” listed waste (wastes from specific sources, Section 261.32);
- “P” listed waste (unused acutely hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33);
- “U” listed waste (unused toxic hazardous off-specification materials as well as container residues and spill residues of these materials, Section 261.33).

**QUESTION:** Is the waste a listed hazardous waste, or is it mixed with or derived from one?  Yes  No

---

## Part I-B. *Characteristic Hazardous Waste Determination*

Wastes may be hazardous if they display any of four characteristics: ignitability, corrosiveness, reactivity, or toxicity.

### Information to Help You Make This Determination

#### Ignitability

Wastes that are hazardous because they may ignite include the following:

- Liquid wastes (other than those aqueous waste containing less than 24 percent alcohol by volume) that have a flash point less than 60°C (140°F). (The test method is the Pensky-Martens closed cup tester, using the test method specified in ASTM Standard D-93-79 or D-93-80, or a Setaflash closed cup tester, using the test method specified in ASTM Standard D-3278-78.)
- Nonliquid wastes that, under standard temperature and pressure, are capable of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burn so vigorously and persistently that they create a hazard.
- Wastes that meet the definition of an ignitable compressed gas (see 49 CFR Section 173.300).
- Wastes that meet the definition of an oxidizer (see 49 CFR Section 173.151).

**QUESTION:** Is the waste ignitable according to 40 CFR Section 261.21?  Yes  No

---

#### Corrosiveness

Wastes that are hazardous because they are corrosive include the following:

- aqueous wastes with a pH of 2 units or below or of 12.5 units or above;
- liquid wastes that corrode steel at a rate greater than 6.35 mm (0.250 inches) per year.

**QUESTION:** Is the waste corrosive according to 40 CFR Section 261.22?  Yes  No

---

## Reactivity

A waste is considered reactive if it meets any of the following conditions:

- It is capable of detonation or explosive decomposition or reaction
  - at standard temperature and pressure,
  - if subjected to a strong ignition source, or
  - if heated under confinement.
- When mixed with water, it is
  - potentially explosive,
  - reacts violently, or
  - generates toxic gases or vapors.
- If a cyanide or sulfide-bearing waste is exposed to pH conditions between 2 and 12.5, it can generate enough toxic gases, vapors, or fumes to present a danger to human health or the environment. Generally, if a waste generates **250** ppm or more of reactive cyanides or **500** ppm or more of reactive sulfides, it is considered a reactive waste. (It should be noted that these levels of reactive compounds are just guidance. Each waste must be evaluated for reactivity on a case-by-case basis).
- It is normally unstable and readily undergoes violent change without detonating.
- It is a forbidden explosive (as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53).
- It is a Class B explosive (see 49 CFR Section 173.88).

**QUESTION:** Is the waste reactive according to 40 CFR Section 261.23?

Yes  No

## Toxicity

A waste is toxic if the toxicity characteristic leaching procedure (TCLP) shows that a representative sample from the waste contains one or more constituents at or above the levels listed in Table 3-1. The TCLP is described in EPA Method 1311 (SW-846).

**QUESTION:** Is the waste toxic according to 40 CFR Section 261.24?

Yes  No

**Table 3-1. TCLP Regulatory Levels**

arsenic — 5.0 mg/l	1,4-dichlorobenzene — 7.5 mg/l	nitrobenzene — 2.0 mg/l
barium — 100.0 mg/l	1,2-dichloroethane — 0.5 mg/l	pentachlorophenol — 100.0 mg/l
benzene — 0.5 mg/l	1,1-dichloroethylene — 0.7 mg/l	pyridine — 5.0 mg/l
cadmium — 1.0 mg/l	2,4-dinitrotoluene — 0.13 mg/l	selenium — 1.0 mg/l
carbon tetrachloride — 0.5 mg/l	endrin — 0.02 mg/l	silver — 5.0 mg/l
chlordane — 0.03 mg/l	heptachlor (and its epoxide) — 0.008 mg/l	tetrachloroethylene — 0.7 mg/l
chlorobenzene — 100.0 mg/l	hexachlorobenzene — 0.13 mg/l	toxaphene — 0.5 mg/l
chloroform — 6.0 mg/l	hexachlorobutadiene — 0.5 mg/l	trichloroethylene — 0.5 mg/l
chromium — 5.0 mg/l	hexachloroethane — 3.0 mg/l	2,4,5-trichlorophenol — 400.0 mg/l
o-cresol — 200.0 mg/l	lead — 5.0 mg/l	2,4,6-trichlorophenol — 2.0 mg/l
m-cresol — 200.0 mg/l	lindane — 0.4 mg/l	2,4,5-TP (Silvex) — 1.0 mg/l
p-cresol — 200.0 mg/l	mercury — 0.2 mg/l	vinyl chloride — 0.2 mg/l
cresol — 200.0 mg/l	methoxychlor — 10.0 mg/l	
2,4-D — 10.0 mg/l	methyl ethyl ketone — 200.0 mg/l	

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## Review of Checklist Part I: Hazardous Waste

IF the answer to any of the preceding questions in Part I is “Yes,”  
THEN the waste is HAZARDOUS; PROCEED to Chapter 4.

IF the answers are “No” to all the preceding questions,  
AND the waste is NONINDUSTRIAL,  
THEN STOP here.

IF the answers are “No” to all of the preceding questions,  
AND the waste is INDUSTRIAL,  
THEN PROCEED to Part II.

---

## Part II: Nonhazardous Industrial Waste Classes 1 & 2

The determination in this part of the checklist applies only to nonhazardous industrial waste—see Figure 1-1 in Chapter 1. (This part of the checklist is based on regulations found in 30 TAC Sections 335.505–06 and 335.508).

IF the answer to any of the **un-numbered** questions  
in this part of the checklist is “Yes,”  
THEN the nonhazardous industrial waste is a Class 1 waste.

IF all the answers to the **un-numbered** questions in this part are “No,”  
THEN the industrial waste is a Class 2 waste.

---

### Generator’s Self-Classification

QUESTION: Has the generator chosen to classify its nonhazardous waste as Class 1?  Yes  No

---

### Container Waste

IF the waste is a container, greater than 5 gallons  
in holding capacity, which has held

- a hazardous substance (as defined in 40 CFR Part 302 and listed in Appendix A of this guidance document),
- a hazardous waste (including acutely hazardous wastes),
- a Class 1 waste, and/or
- a material that would be classified as a hazardous or Class 1 waste if disposed of,

THEN answer questions 1 and 2. *(Please note that containers that have held acutely hazardous wastes must be triple-rinsed before they can be classified as empty).*

IF these conditions are not present in your situation,  
THEN proceed to the next un-numbered question.

1. Has the container had all its residues removed?  Yes  No
2. Has the container been rendered unusable?  Yes  No

QUESTION: Are **any** of the answers to questions (1) or (2) above “NO”?  Yes  No

---

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## Regulated Asbestos-Containing Material (RACM)

(See Chapter 8, Definition of Terms, for information on RACM.)

**QUESTION:** Does the waste contain asbestos material identified as RACM, as defined in 40 CFR Part 61? \*

Yes  No

---

## Polychlorinated Biphenyls (PCBs)

**QUESTION:** Is the waste contaminated by a material that originally contained 50 or more parts per million (ppm) total PCBs? \*

Yes  No

**QUESTION:** Does the waste contain 50 or more ppm PCBs?\*

Yes  No

---

## Petroleum Substance Waste

1. Is your waste specifically identified as a *petroleum substance* (see Chapter 8, Definitions of Terms) or contaminated with a material identified as a petroleum substance waste?  Yes  No
2. Does the waste contain more than 1,500 ppm total petroleum hydrocarbons (TPH)?  Yes  No

**QUESTION:** Are the answers to **both** of the numbered questions above “Yes”? (If one or both of the answers are “No,” enter “No” for this question.)

Yes  No

---

## “New Chemical Substance”

See “new chemical substances wastes” in Chapter 8, Definitions and Terms, for a description of how this particular type of waste may be classified as Class 2 or 3.

**QUESTION:** Is the waste from the production of a “new chemical substance,” as defined by the federal Toxic Substances Control Act, 15 U.S.C.A. Section 2602(9)?

Yes  No

---

## Out-of-State Origin

See “wastes generated out-of-state” in Chapter 8, Definitions of Terms, for details on how this particular type of waste may be classified as Class 2 or 3.

**QUESTION:** Is the waste generated outside Texas?

Yes  No

---

## Constituent Levels and Specified Properties for Nonhazardous Industrial Class 1 Wastes

**QUESTION:** If the waste is a liquid, does it have a flash point of less than 65.6°C (150°F)? \*

Yes  No

**QUESTION:** Is the waste a solid or semi-solid that—under conditions normally encountered in storage, transportation, and disposal—

- is liable to cause fires through friction or through retained heat from manufacturing or processing; or
- can be ignited readily, and when ignited burns so vigorously and persistently as to create a serious hazard?

Yes  No

**QUESTION:** Is the waste a semi-solid or solid that, when mixed with an equivalent weight of ASTM Type II laboratory distilled or deionized water, produces a solution with a pH of 2 or less or 12.5 or more?

Yes  No

**(Exception:** for solidified, stabilized, encapsulated, or otherwise chemically bound wastes, an exception is provided in 30 TAC Section 335.505(3)) \*

**QUESTION:** Does the waste leach Class 1 toxic constituents at or above the levels listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R when submitted to the toxicity characteristic leaching procedure (TCLP)? \*

Yes  No

(For a copy of Table 1, Appendix 1, see Appendix C of this guidance document.)

(Where matrix interferences of the waste cause the Practical Quantitation Limit (PQL) of the specific analysis to be greater than the Maximum Concentration listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R, then the achievable PQL becomes the Maximum Concentration, provided that the generator maintains documentation that satisfactorily demonstrates to the TCEQ that lower levels of quantitation of a sample are not possible.)

A satisfactory demonstration includes the results from the analysis of the waste for that specific constituent by a laboratory using an appropriate method found in *Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods* (EPA SW-846); *Methods or Chemical Analysis of Water and Wastes* (EPA-600 series); *Standard Methods for the Examination of Water and Wastewater*; *American Society for Testing and Materials (ASTM) Standard Methods*; or an equivalent method approved by the TCEQ.

---

### Lack of Class 2 or 3 Information

**QUESTION:** Is information lacking that demonstrates the waste belongs in Class 2 or 3?

Yes  No

---

### Review of Checklist Part II: Class 1 or 2 Nonhazardous Industrial Waste

IF the answer to any of the preceding  
**un-numbered** questions in Part II is "Yes,"  
THEN the nonhazardous industrial waste is a Class 1 waste.  
PROCEED to Chapter 4.

IF the answers are "No" to all the preceding  
**un-numbered** questions in Part II,  
THEN the industrial waste is a Class 2 waste.  
PROCEED to Chapter 4.

IF the answers are "No" to all of the preceding  
**un-numbered** questions in Part II,  
AND the industrial generator wishes to evaluate  
the waste for a possible Class 3 status,  
THEN PROCEED to Part III.

---

---

## Part III: Nonhazardous Industrial Class 3 Waste

This part of the checklist applies only to nonhazardous, industrial waste that does not meet the definition of a Class 1 waste and is not specifically identified as a Class 2 waste. (The corresponding regulations for this part of the checklist can be found in 30 TAC Sections 335.507 and 335.508.)

---

### Part III-A. Initial Determinations for Class 3 Status

IF the answer to any of the following questions in Part III-A is “Yes,”  
THEN the nonhazardous, industrial waste **cannot** be considered a Class 3 waste.

---

#### Containers

QUESTION: Is the waste an empty container?  Yes  No

---

#### Medical Waste

(For a definition, see “medical wastes” in Chapter 8.)

QUESTION: Is the waste a medical waste regulated under 30 TAC Chapter 330, Subchapter Y?  Yes  No

---

#### Distilled Water Leaching Test

QUESTION: When subjected to the 7-day distilled water leaching test, does the waste leach constituents at or above the maximum contaminant levels listed in Table 3, Appendix 1 of 30 TAC Chapter 335, Subchapter R? \*

Yes  No

(Table 3 is reproduced in Appendix D of this guidance document.)

---

#### Toxicity Characteristic Leaching Procedure

QUESTION: When submitted to the toxicity characteristic leaching procedure (TCLP), does the waste leach Class 1 toxic constituents listed in Table 1, Appendix 1 of 30 TAC Chapter 335 Subchapter R at or above their detection levels? \*

Yes  No

(The list of Class 1 toxic constituents is reproduced in Appendix E of this guidance document.)

**Exclusion:** Excluded from this list of Class 1 toxic constituents are those addressed in the previous question (that is, constituents identified in Table 3, Appendix 1 of 30 TAC Chapter 335 Subchapter R).

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#### Petroleum Hydrocarbons

QUESTION: Does the waste contain detectable levels of petroleum hydrocarbons (Method 1005)? \*

Yes  No

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#### Polychlorinated Biphenyls (PCBs)

QUESTION: Does the waste contain detectable levels of PCBs? \*

Yes  No

---

#### Decomposition

QUESTION: Is the waste readily decomposable?

Yes  No

---

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## Review of Checklist Part III-A: Class 3 Nonhazardous Industrial Waste

IF the answer to any of the preceding questions in Part III-A is "Yes,"  
THEN the nonhazardous, industrial waste **cannot** be considered a Class 3 waste.

IF all the answers to the preceding questions in Part III-A are "No,"  
THEN proceed to Part III-B to continue the waste's evaluation for possible Class 3 status.

---

## Part III-B: Final Determinations for Class 3 Status

### Inertness

**QUESTION:** Is the waste inert? (Inertness refers to chemical inactivity of an element, a compound, or a waste.)

Yes  No

---

### Insolubility

**QUESTION:** Is the waste essentially insoluble?

Yes  No

(*Note:* wastes that contain liquids are *NOT* considered insoluble.)

---

## Review of Checklist Part III

IF the answer to any question under Part III-B is "No,"  
THEN the nonhazardous, industrial waste **cannot** be considered a Class 3 waste.

IF all the answers to the questions in Part III-A are "No,"  
AND all the answers to the questions in Part III-B are "YES,"  
THEN the nonhazardous industrial waste is a Class 3 waste.

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## Part IV. Variance from Waste Classification

The TCEQ may determine, on a case-by-case basis, the merits of a variance request for a specific nonhazardous classification. The burden of justifying the need for a variance is on the requestor. The requestor must submit information sufficient to clearly indicate the issues involved, the reason(s) for the request, and both the positive and negative impacts that may result from the granting of the variance. (The regulations corresponding to these types of variance requests can be found in 30 TAC Section 335.514, Variance from Waste Classification Provisions.)

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\* **As a reminder**, these characteristics need not necessarily be addressed by analytical testing. A generator may be able to address them through process knowledge. For more information on process knowledge, please see Chapter 4 of this guidance document.

# Process Knowledge, Analytical Testing, and Documentation Requirements

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## Introduction

Now that you know how to classify your wastes, you are ready to compile supporting documentation. Documentation should support the classification and coding of a waste stream. You must properly document each waste stream generated by the facility, and keep that documentation for at least three years after the waste is no longer generated, stored, or recycled or until the site is closed.

The regulations on documentation requirements can be found in 30 TAC Section 335.9 (Record Keeping and Annual Reporting Procedures Applicable to Generators), Section 335.70 (Record Keeping), Section 335.510 (Sampling Documentation), Section 335.511 (Use of Process Knowledge), and Section 335.513 (Documentation Required).

The TCEQ randomly audits a portion of waste stream *notifications* (see Chapter 6) in order to ensure proper classification and coding of waste in Texas. When the TCEQ sends you a request for information for the purpose of an audit, you must send the agency the information that you have gathered to make your hazardous waste determination/waste classification. Please use Chapter 4 as a guide to compiling supporting documentation for each waste stream generated at your facility.

## Process Knowledge

If process knowledge is used in classifying a waste, that knowledge must be documented and kept on file for three years. Process knowledge must be in writing or stored in some electronic form. It cannot be stored solely in someone's mind. The process knowledge must support a generator's reasoning about why the waste has been given a particular classification. It must also support the generator's reasoning about why a particular test method was not performed.

The following are some examples of process knowledge that may assist in classifying waste:

- description of the waste;
- date of initial waste generation;

- a detailed description of the process generating the waste (that is, identification of chemicals or other materials in the process that generated the waste stream (including any potential breakdown products));
- manufacturer's literature such as Material Safety Data Sheets—MSDSs (although they were not created for the purpose of determining Texas waste classification, and do not contain information on all constituents found in a product, MSDSs may be helpful);
- full description of activities that generated the waste stream;
- identification of potential contaminants; and
- other documentation generated in conjunction with the particular process.

## Analytical Data

If a generator uses analytical data to classify a waste, the data must be supported by documentation of the sampling procedure and the analytical testing. The following lists specify information that must be maintained when analytical data is used for classification purposes.

## Sampling Procedures

The following procedures must be documented:

- dates of sample collection;
- description of the site and/or unit from which the sample was taken, including sampling locations;
- the method and equipment used for sampling;
- a description of the sampling techniques, including collection, containerization, and preservation; and
- rationale—that is, supporting reasons—for the sampling plan (why the number, type, and location of samples taken accurately represent the waste stream being characterized).

## Analytical Testing

Documentation of analytical testing must include the following:

- Analytical **results** (including quality control data).
- Analytical **methods** (including any preparatory methods).
- The **detection limits** for each analysis.
- **Name of laboratory** performing the analysis.
- **Chain of custody**—documentation tracking the condition of the waste containers. For example, were the waste containers and their seal intact or broken upon arrival at the laboratory? Were the containers full, half-full, or empty? Did all the containers arrive at the laboratory or just a partial shipment?
- Documentation that satisfactorily demonstrates that lower levels of *quantitation* are not possible (this is only necessary when the waste media causes the *Estimated Quantitation Limit* (EQL) of a Class 1 toxic constituent (as listed in Appendix E of this guidance document) to be greater than the concentration listed (*matrix interference*). (Terms in italics are explained in Chapter 8.)

## Classification Checklist

Although the checklist in Chapter 3 can be used to help classify industrial and hazardous waste, a generator should support the checklist’s “yes” or “no” responses with process knowledge and/or analytical data. A completed checklist by itself is not sufficient documentation to submit to the TCEQ in response to a random audit of classification.

For example, a generator answers “no” to the question “Is the waste ignitable according to 40 CFR Section 261.21?” You can support this response by submitting process knowledge, analytical data, or both. If process knowledge is used, it must be **specific**. A general statement such as “the waste is not ignitable” would not be sufficient.

Instead, you should document specific actions you took and their results, such as (1) reviewed all constituents that may be present in the waste; (2) determined that each constituent present in the waste does not meet the definition of an ignitable waste; and (3) determined that the process generating the waste does not introduce any ignitable characteristics to the waste stream. You should keep copies of your documentation demonstrating that the constituents in the waste stream would not cause the waste to exhibit the characteristic of ignitability.

## Rule of Thumb about Documentation

Remember that documentation should demonstrate why a waste has been given a particular classification. Here’s a good rule of thumb: if someone else can review your classification documentation, using the published criteria and/or the checklist, and arrive at the same classification you did, then you have probably done a good job of compiling supporting documentation for a waste classification. On the other hand, if someone reviews your classification and still has unanswered questions, then you may want to gather additional documentation (from process knowledge and/or analytical data) to support your classification of that waste stream.

# Texas Waste Code Formula

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Chapter 5 describes the 8-digit Texas waste code that identifies each of your waste streams. (Part of the information to complete this waste code comes from the waste determination process (described in Chapter 3) and from the documentation you must compile and keep on hand (described in Chapter 4).)

The formula for the Texas waste code is given in Figure 5-1. The rules corresponding to this formula can be found in 30 TAC Section 335.503 (Waste Classification and Waste Coding Required).

## Sequence Number

Although called a sequence “number,” this part of the code may contain a mix of numbers and letters—alphanumeric; and sometimes it may consist of letters alone. Various types of 4-digit sequence numbers are used in the Texas waste code.

- An **arbitrary and unique 4-digit number from 0001 to 9999** (no alpha characters), which is assigned by the generator when adding a waste stream to Texas facility’s *Notice of Registration* (see Chapter 6, Notification Requirements). Once assigned to a particular waste stream, a sequence number **cannot be reassigned** to another waste stream. Generators need not sequentially assign sequence numbers to a facility’s waste streams.
- A **4-digit alphanumeric number** assigned by the TCEQ (under the **one-time shipment program**) to wastes generated by unregistered generators within Texas. (Spill waste not managed under the Emergency Response Program may be handled in this manner.)
- **“SPIL”** to be assigned only by the Emergency Response Team of the Field Operations Division **for spill wastes regulated under the Emergency Response Program.**
- **“OUTS”** to be used for **wastes generated outside of Texas.**
- **“CESQ”** to be used by **municipal hazardous and industrial CESQs** (Conditionally Exempt Small-Quantity Generators).
- **“TSDF”** (treatment, storage, and disposal facilities), to be used by facilities that

(1) receive and consolidate a waste stream with other like waste streams (thus not changing the form or composition of the waste); or (2) store a received waste without treating or changing its form or composition. This sequence number does not apply to wastes that are treated or altered in some other way. The “TSDF” designation is to be used only by **facilities that store and/or accumulate waste** from more than one site for subsequent shipment to a treatment or disposal facility.

## Form Code

The second series of numbers found in the Texas waste code is the “form code.” The list of form codes as well as flowcharts that depict the choosing of a form code can be found in Appendix G.

Form codes are broken down into 10 major categories. They are Lab Packs, Inorganic Liquids, Organic Liquids, Inorganic Solids, Organic Solids, Inorganic Sludges, Organic Sludges, Inorganic Gases, Organic Gases, and Plant Trash. The various form codes and corresponding descriptions can be found under these categories in Appendix G.

In determining a waste stream’s form code, TCEQ recommends that the generator first determine the major category into which the waste stream fits. Then review all the form code descriptions in that category to determine which code or codes best describe your waste stream. From this narrowed-down list, choose a form code for the waste stream.

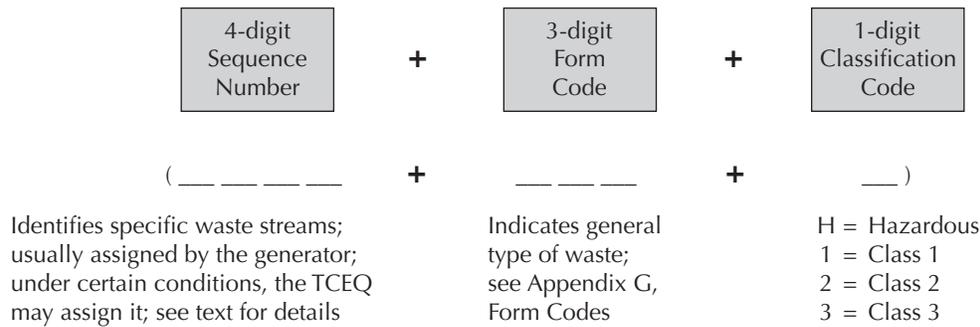
## Classification

The waste stream’s classification completes the Texas waste code. As Figure 5-1 showed, this part of the Texas waste code will be “H” or “1”, “2”, or “3”.

### **Stop! Are You about to Misclassify a Waste?**

Table 5-1 provides additional information about using certain combinations of form and class codes.

**Figure 5-1. Components of a Texas Waste Code**



**Table 5-1. Questions to Ask about Some Combinations of Coding and Classification**

IF the waste is ...	AND you assigned form codes ...	Are you sure about a classification of ...
Any Class 3 waste	Any form code	<i>Class 3?</i> (You must submit all supporting documentation)
Asbestos solids, debris, slurry, sludge, etc.	311, 515	<i>Class 2?</i> (Wastes that contain regulated asbestos-containing material are Class 1)
Oils	205, 206 <sup>a</sup>	<i>Class 2?</i> (Wastes that contain more than 1,500 ppm total petroleum hydrocarbons are Class 1)
PCB-containing materials	297, 298, 394, 395, 396, 397, 398, 399, 494, 495, 496, 497, 498, 499, 598, 599, 698, 699	<i>Class 2?</i> (Wastes that contain 50 ppm or more PCBs are Class 1)
Petroleum-containing materials	205, 206 <sup>a</sup> , 296, 489, 510, 603, 606, 695, 696	(Petroleum substance wastes that contain more than 1,500 ppm total petroleum hydrocarbons are Class 1)
Plant trash	902 and 999 <sup>b</sup>	<i>Hazardous, Class 1, or Class 3?</i> (Only wastes that are Class 2 may be given a form code for plant trash)
Spent lead acid batteries	309 <sup>c</sup>	Hazardous

<sup>a</sup> If your waste oil is nonhazardous, is managed under 40 CFR 279 and 30 TAC 324, and is recycled 100 percent, then do not add to your Notice of Registration (the central record that the TCEQ compiles from waste notifications you send in—see Chapter 6, Notification Requirements and Forms).

<sup>b</sup> Only form codes 902 and 999 may be used.

<sup>c</sup> If all your lead acid batteries are managed under the “universal waste” rule in 40 CFR Part 273, then do not add to your Notice of Registration.

# Notification Requirements and Forms

This chapter describes forms and supporting documentation you must send to the TCEQ to notify the agency about waste streams that you generate. The regulations on notification can be found in 30 TAC Section 335.6 (Notification Requirements), Section 335.502 (Conversion to New Waste Notification and Classification System), Section 335.508 (Classification of Specific Industrial Solid Wastes), Section 335.509 (Waste Analysis), and Section 335.513 (Documentation Required).

## Notifications about Industrial or Hazardous Waste

You must submit information about industrial or hazardous wastes no later than 90 days after the waste's initial generation and before handling, shipment, or disposal; use TCEQ form 00002 or the TCEQ State of Texas Environmental Electronic Reporting System (STEERS) software. (For information on obtaining TCEQ forms and how to access the STEERS information, see this chapter's section "TCEQ and EPA Forms.")

**Please Note:** All Large-Quantity Generators (LQG) **must** use STEERS to update their Notice of Registration (NOR). This requirement, effective December 15, 1997, is found in 30 TAC Section 335.6(b). Therefore, if you are a LQG and you need to update your NOR to replace inactivated waste code, please do so using STEERS.

The TCEQ uses the information submitted on these forms to create a record called the *Notice of Registration*, which contains site-specific waste management information about industrial and municipal hazardous waste generators in Texas.

## Notifications about New Chemical Substance Waste

For a Class 2 or Class 3 waste generated as the result of the production of a "new chemical substance" (see Chapter 8, Definitions of Terms), you must follow the instructions below:

- Give the TCEQ notice that the waste is from the production of a "new chemical substance."
- Submit all supporting reasons and documentation used in that waste's classification.

- Manage nonhazardous waste from the production of a "new chemical substance" as a Class 1 waste, unless you can provide appropriate analytical data and/or process knowledge demonstrating that the waste meets the definition of a Class 2 or Class 3, and the TCEQ concurs. (For definitions of Class 2 and 3, see Chapter 8 and the classification checklist in Chapter 3.)
- If you have not received concurrence or denial from the TCEQ within 120 days from the date of your request for review, you may manage the waste according to the requested classification, but you must give the TCEQ 10 working days written notice before managing the waste as a Class 2 or a Class 3.

## Notifications about Class 2 and Class 3 Out-of-State Waste

If you want to ship a nonhazardous waste into Texas, it is automatically considered a Class 1 waste (and expected to be managed as such) unless

- you request the TCEQ to review your waste classification documentation supporting a lower classification such as Class 2 or 3; and
- the TCEQ concurs with the lower classification.

After concurrence from the TCEQ you must comply with the lower classification's requirements on shipping, record keeping, and disposal of the waste. If, after review of your documentation, the TCEQ disagrees with your waste classification, you must continue managing the nonhazardous waste as Class 1 waste.

## Notifications about Other Industrial and Hazardous Wastes from out of State

Please note the following special requirements for the documentation of industrial and hazardous waste that is imported to Texas from foreign countries and other U.S. states.

- If out-of-state generators and importers of record want to bring hazardous waste into Texas, they must have an EPA Identification number. Generators and importers who do

- not have this ID number must obtain one from the EPA, using EPA Form 8700-12.
- Out-of-state generators or importers of record must fill out a Uniform Hazardous Waste Manifest (TCEQ-00311) and place their EPA ID number in Box 1 of this form.
- In Box B of the Uniform Hazardous Waste Manifest, use one of the generic numbers for identifying the country or state of origin. For example: F0061 for hazardous and or nonhazardous industrial waste imported from Mexico, D0022 for Louisiana (Appendix H gives these codes). For more information about manifesting imported industrial and hazardous waste, see 40 CFR 262.60 and 30 TAC 335.76 (d).
- OUTS must be used as the 4-digit sequence number of the Texas waste code in Box I of the manifest.

## Notifications about Alternate Analytical Methods

Generators who propose an alternate analytical method must validate their alternate method by demonstrating that it is equal to or superior in accuracy, precision, and sensitivity to the corresponding EPA-approved methods for analytical testing given in *Standard Methods for the Examination of Water and Wastewater*, SW-846, and EPA-600/4-79/020.

In making this demonstration, the generator must provide the TCEQ, at a minimum, the following documentation:

- a full description of the proposed method (including all equipment and reagents to be used);
- a description of type of waste and *waste matrices* to be analyzed (for definitions of terms in italics, see Chapter 8);
- comparative results of the proposed method and corresponding SW-846 or *ASTM* method;
- a complete assessment of interferences with the proposed method (see, for example, *matrix interference* in Chapter 8);
- a description of quality control procedures; and
- additional information as needed and/or requested by the TCEQ to adequately review the proposed alternate method.

## TCEQ and EPA Forms

### How to Order

Notification forms can be obtained in several ways:

- Contact the TCEQ regional office near you.
- On the Internet go to <[www.tceq.texas.gov](http://www.tceq.texas.gov)> and select the “Forms” link. Access the

Forms Database and type in the form number. (The instructions for form TCEQ-00002 are in a separate download file).

- Fax your order to 512-239-4488, or order forms by voice at 512-239-0028, the TCEQ’s publications unit. Be sure to give the form **numbers** that you want; this information will help the TCEQ get the correct form to you as quickly as possible.

### How to Access STEERS

State of Texas Environmental Electronic Reporting System (STEERS) information, including an application package, can be obtained as follows:

- on the Internet, go to <<https://www3.tceq.texas.gov/steers>>; or
- call the STEERS Help Line at 512-239-6925.

### Currently Available Forms

Notification forms available at the time of this printing include the following:

- The hazardous or industrial waste “**Initial Notification Form,**” used for initial notification about a site, and adding a waste stream to your Notice of Registration (see Chapter 6) or when recording a 6-digit waste code into one or more 8-digit waste codes. (form number: **TCEQ-00002**)
- The “**Hazardous or Industrial Waste Management Unit Form,**” used when adding information about a waste management unit to a Notice of Registration. (form number: **TCEQ-00002**)
- The “**Uniform Hazardous Waste Manifest,**” used by generators and transporters of hazardous waste and by owners or operators of hazardous waste treatment, storage, and disposal facilities for both inter- and intrastate transportation. (form number: **TCEQ-00311**—Only order form available on the Web)
- The “**One-Time Shipment Request ... for Shipment of Class 1, 2, 3 and EPA Hazardous Waste,**” used by unregistered generators, not by generators that already have a site’s Notice of Registration. (form number: **TCEQ-00757**)
- The EPA “**Notification of Regulated Waste Activity**” form, used when notifying EPA of a federally regulated hazardous waste activity—for example, the generation of hazardous waste. (form number: **EPA 8700-12**—Available on the Web as part of TCEQ-00002)

# Management of Mechanical Shredding Wastes

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The regulations on mechanical shredding waste can be found in 30 TAC Section 335.508 (Classification of Specific Industrial Solid Wastes).

Wastes generated by the mechanical shredding of automobiles, appliances, or other items of scrap, used, or obsolete metals are handled according to the provisions of the Texas Solid Waste Disposal Act, Health and Safety Code, Section 361.019 (Vernon Pamphlet 1992), until the TCEQ develops specific standards for the

classification of this waste and ensures adequate disposal capacity.

These provisions say that you can dispose of mechanical shredding wastes in a municipal landfill facility authorized to accept Class 1 and 2 industrial solid wastes, if the shredding waste:

- contains no free liquids, and
- is not a hazardous waste.

As mentioned earlier, TCEQ may establish other requirements.

# Definitions of Terms

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For readers' convenience, this chapter gives the full version of some abbreviations and brief descriptions of some important terms used in this guidance document. Full, official definitions can be found in the sources cited. Nothing in this chapter takes the place of any definitions in laws, rules, or regulations.

**Acutely hazardous wastes** (40 Code of Federal Regulations (CFRs) Parts 261.31–33 and subject to the exclusion established in 40 CFR Part 261.5: EPA hazardous waste numbers F020, F022, F023, F026, and F027)—A subset of *listed hazardous wastes* that carry the “H” code; they are considered very harmful to human health and the environment.

**ASTM**—American Society for Testing and Material

**CFR**—Code of Federal Regulations

**Characteristically hazardous waste** (40 CFR Part 261 Subpart C)—Any waste that exhibits the characteristics of ignitability, corrosivity, reactivity, and/or toxicity as defined by the EPA in 40 CFR Part 261 Subpart C. These are often referred to as the “D” wastes. (Also see Chapter 3 of this guidance document.)

**Class 1 waste** [30 TAC Section 335.1(14)]—Any waste or mixture of waste 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, disposed of, or otherwise managed. (The checklist in Chapter 3 takes you through the process of distinguishing hazardous waste from nonhazardous Class 1 waste.)

**Class 2 waste** [30 TAC Section 335.1(15)]—Any individual waste or combination of waste that cannot be described as hazardous waste or as nonhazardous Class 1 or Class 3 waste.

**Class 3 waste** [30 TAC Section 335.1(16)]—Waste that is *inert* and *essentially insoluble* (see definitions of terms in italics), usually including but not limited

to materials such as rock, brick, glass, dirt, certain plastics, rubber, and similar materials that are not readily decomposable.

**Classification code** (30 TAC Section 335.503)—This last digit of the Texas waste code represents the classification of the waste stream. The letter H represents hazardous wastes; and the number 1, 2, or 3 represents nonhazardous industrial waste Class 1, 2, or 3.

**Conditionally Exempt Small-Quantity Generator** (30 TAC Section 335.78)—Generators of less than 100 kg (220 lbs) per month of hazardous waste, or less than 1 kg (2.2 lbs) per month of *acutely hazardous waste* (see description of term in italics in this chapter).

**Essential insolubility** (30 TAC Section 335.507)—Is established when using:

- the Seven-Day Distilled Water Leachate Test, and the extract from the sample of waste does not leach greater than the Maximum Contaminant Level listed in Appendix 1, Table 3 of 30 TAC Chapter 335, Subchapter R;
- the test methods described in 40 Code of Federal Regulations Part 261, Appendix II, and the extract from the sample of waste does not exhibit detectable levels of the constituents found in Appendix 1, Table 1 of 30 TAC Chapter 335, Subchapter R;
- an appropriate test method, and a representative sampling of the waste does not exhibit detectable levels of total petroleum hydrocarbon (TPH); (“Petroleum substance wastes” are not subject to 30 TAC’s subsection on essential insolubility.)
- an appropriate test method, and a representative sampling of the waste does not exhibit detectable levels of polychlorinated biphenyls (PCBs).

**Form code** (30 TAC Section 335.503)—This code describes the general type of waste stream. It consists of three numbers, the 5th, 6th, and 7th digits in the Texas waste code (see Figure 5-1 in Chapter 5). More than one form code may apply to a particular waste stream.

**Hazardous substance** (30 TAC Section 335.508)—Any substance designated as “hazardous” in 40 CFR Part 302 (Table 302.4) including, but not limited to, waste designated as hazardous in the Resource Conservation Recovery Act (RCRA).

**Hazardous waste** (40 CFR 261.3.)—The EPA defines a waste as hazardous if it exhibits one or more of four hazardous “characteristics,” or if it is one of several hundred wastes “listed” as hazardous. For details, see Chapters 1 and 3 of this guidance document.

**Hazardous waste determination** (30 TAC Section 335.504)—An evaluation of a waste to determine whether it meets the RCRA definition of a hazardous waste.

**Inert** (30 TAC Section 335.507)—Inertness refers to the chemical inactivity of an element, compound, or waste. Ingredients added to mixtures chiefly for the purposes of bulk and/or weight are normally considered inert.

**Listed hazardous wastes** (40 CFR Part 261 Subpart D)—Specific wastes that have been identified by the EPA as hazardous. These are often referred to as the “F” wastes (waste from nonspecific sources); “K” wastes (wastes from specific sources); “P” wastes (acutely hazardous off-specification materials, container residues, and spill residues of these materials); and “U” wastes (toxic, hazardous off-specification materials, container residues, and spill residues).

A waste is considered hazardous if

- it is listed in 40 CFR Part 261 Subpart D, or
- is mixed with or derived from a waste listed there, and
- has not been provided a particular exclusion from the definition of hazardous as provided in 40 CFR Sections 261.3–4.

**Matrix interference**—Interference with the precision of analytical testing for a particular constituent in a waste stream due to other material(s) in the sample (contamination by carryover). See also waste matrices.

**Medical wastes** (30 TAC Section 335.508)—Nonhazardous medical wastes that are subject to the provisions of 30 TAC Chapter 330 Subchapter Y are designated as Class 2 wastes. An example of such waste would be needle-bearing syringes from plant infirmaries.

**“New chemical substance” waste** (30 TAC Section 335.508)—If a nonhazardous industrial waste is generated as a result of the commercial production of a “new chemical substance” as defined by the federal Toxic Substances Control Act, *United States Code Annotated* (U.S.C.A.), Title 15, Section 2602(9), the generator must manage that waste as a Class 1 waste, unless the generator can provide appropriate analytical data and/or process knowledge demonstrating that the waste is Class 2 or Class 3, and the TCEQ concurs. If the generator has not received concurrence or denial from the TCEQ within 120 days from the date of the request for review, the generator may manage the waste according to the requested classification, but not before giving 10 working days written notice to the TCEQ.

**Notice of Registration (NOR)**—TCEQ term for the information it collects in its database on each hazardous or industrial waste handler: generator, receiver, transporter, and recycler. The NOR includes the facility’s physical and mailing addresses, information on waste streams that are generated or handled at the site, a list of individual units at the facility where wastes are managed, and other information. It also contains the state facility identification numbers and the EPA facility number, issued by the TCEQ. The NOR serves to verify the information submitted by each handler. When a generator registers with the TCEQ using form TCEQ-00002, the agency sends back a printout of the information in its database about the site and generator. The handler should keep the NOR current and in on-site files and check it periodically to make sure that it accurately reflects the facility’s waste streams and waste management units.

**Petroleum-hydrocarbon-containing wastes** (30 TAC Section 335.508)—Wastes resulting from the cleanup of leaking underground storage tanks (USTs), which are regulated under 30 TAC Chapter 334 Subchapter K (relating to Petroleum Substance Waste), are not subject to classification under 30 TAC Chapter 335 Subchapter R (Waste Classification).

**Petroleum substance**—A crude oil, or any refined or unrefined fraction or derivative of crude oil, that is a liquid at standard conditions of temperature and pressure. These substances include the following:

- combinations or mixtures of basic petroleum substances, such as crude oils, crude oil fractions, petroleum feedstocks, and petroleum fractions;

- aviation gasolines, aviation jet fuels, distillate fuel oils, residual fuel oils, gas turbine fuel oils, illuminating oils, lubricants, building materials, insulating and waterproofing materials, used oils;
- solvents or a combination or mixture of solvents—except for any listed substance regulated as a hazardous waste under the federal Solid Waste Disposal Act, Subtitle C (*United States Code*, Title 42, Section 6921, et seq.)—that are liquid at standard conditions of temperature (20° centigrade) and pressure (1 atmosphere). Examples include Stoddard solvent, petroleum spirits, mineral spirits, petroleum ether, varnish makers’ and painters’ naphthas, petroleum extender oils, and commercial hexane.

The following materials are *not* considered petroleum substances:

- polymerized materials, such as plastics, synthetic rubber, polystyrene, high- and low- density polyethylene;
- animal, microbial, and vegetable fats;
- food-grade oils;
- hardened asphalt and solid asphaltic materials, such as roofing shingles, roofing felt, hot mix and cold mix; and
- cosmetics.

**Practical Quantitation Limits (PQLs)**—See quantitation.

**Process Knowledge**—See examples in Chapter 4 under this subheading.

**Quantitation**—Generally, measurement of quantity or amounts. The word appears in a number of specialized terms used in waste regulation:

- **Quantitation Limits (QLs)** indicate the levels at which measurements can be “trusted.”
- **Practical Quantitation Limits (PQLs)** and **Estimated Quantitation Limits (EQLs)** are levels that are routinely and reliably detected and quantitated in a variety of sample matrices. These are 3 to 5 times the Method Detection Limits (MDLs). (See Chapter 1, SW 846, 1992.)
- **Method Detection Limits (MDLs)** take into account the reagents, sample matrix, and preparation steps applied to a sample in specific analytical methods. (See 40 CFR Part 136, Appendix B; Chapter 1, SW 846, July 1992.)

**RCRA**—Resource Conservation and Recovery Act (amendment to the Solid Waste Disposal Act). Primarily designed to regulate five types of disposal activities: hazardous waste, solid waste, underground storage tanks, oil waste, and medical waste. In this guidance document, any mention of “RCRA” refers to RCRA Subtitle C, which applies to all handlers of hazardous waste, including generators; transporters; and operators of treatment, storage, and disposal (TSDF) facilities. (RCRA, a federal law, covers only whether a solid waste is either hazardous or nonhazardous. Texas regulations further subdivide nonhazardous waste into Classes 1, 2, and 3.)

**Regulated asbestos-containing material (RACM)** (30 TAC Sections 335.508)—RACM includes the following:

- **friable** asbestos containing more than 1 percent asbestos<sup>1</sup> that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure;
- **nonfriable** asbestos-containing material containing more than 1 percent asbestos as measured by the method found in 40 CFR Part 763, Subpart E, Appendix E, Section 1 that, when dry, *cannot* be crumbled, pulverized, or reduced to powder by hand pressure.
- **Category I** nonfriable asbestos includes packings, gaskets, resilient floor coverings, and asphalt roofing products);
- **Category II** nonfriable asbestos includes transite shingles, transite pipes, and any nonfriable asbestos material not defined as Category I.

**Regulated generators** (30 TAC Chapter 335 Sub-chapters A and C)—If you generate the following amounts of waste, you are a regulated generator and must follow regulations in Chapter 335:

Waste Type	Monthly Amount
Class 1	100 kg (220 lbs) or more
hazardous	100 kg (220 lbs) or more
acutely hazardous	1 kg (2.2 lbs) or more

If you generate less than the amounts shown above, you are considered a Conditionally Exempt Small-Quantity Generator and are not subject to regulations requiring notification, manifesting, and fees.

<sup>1</sup>As determined using the method specified in 40 CFR Part 763, Subpart E, Appendix E, Section 1, Polarized Light Microscopy.

**Sequence number** (30 TAC Section 335.503)—The first 4 digits of the waste code (actually these four characters may be numbers, letters, or a combination of the two). The sequence number is used as an internal numbering system determined by each generator. The number of a waste may range from 0001 to 9999, and can only be used once.

**Solid waste** (30 TAC Section 335.1 and 40 CFR Section 261.2)—Any discarded material such as garbage; refuse; sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility; or other material including solid, liquid, semisolid, or contained gaseous material resulting from industrial, municipal, commercial, mining, and agricultural operations. Solid wastes include any material that is abandoned by being disposed of; burned or incinerated; or accumulated, stored, or treated before or in lieu of these activities. Certain recycled materials are also considered wastes. Solid wastes are often referred to simply as “wastes.” For the complete definition of a “solid waste,” please refer to 30 TAC Section 335.1 (Solid Waste).

**Specific industrial solid waste** (30 TAC Section 335.508)—A nonhazardous waste for which specific classification criteria and/or a form code have been established.

**Stabilized wastes** (30 TAC Section 335.508)—Wastes that originally exhibit hazardous characteristics can be *stabilized* so that they are no longer hazardous and can meet the criteria for classification as Class 1 or 2 nonhazardous industrial waste. For example a waste containing lead that exhibits the hazardous characteristic of toxicity can be stabilized by mixing with cement in the proper proportion to reduce the toxicity or mobility of contaminants. Depending on the process(es) used, stabilization achieves varying degrees of long-term effectiveness.

**Synthetic oils**—Oils not derived from crude oil, including those derived from shale, coal, or a polymer-based starting material; and nonpolymeric synthetic fluids that are used as hydraulic fluids and heat transfer fluids, such as those based on phosphate esters, diphenyl oxide, or alkylated benzenes. Synthetic oils are generally used for the same purpose as oils, and they present relatively the same level of hazardousness after use.

**TAC**—Texas Administrative Code. Title 30 of TAC contains TCEQ rules on industrial solid waste and municipal hazardous waste, among other subjects.

**TSDF**—Treatment, storage, and disposal facilities.

**Universal Waste** (30 TAC Section 335.261 and 40 CFR Part 273)—This rule covers five types of waste:

- lamps as described in 40 CFR §273.5, and §335.261(b)(16)(F).
- mercury-containing thermostats as described in 40 CFR 273.4;
- all hazardous waste batteries as described in 40 CFR 273.2;
- some hazardous waste pesticides as described in 40 CFR 273.3;
- paint and paint-related waste as described in §335.262(b);

The rule establishes a reduced set of regulatory requirements for facilities managing universal waste, depending on whether the facility falls into one of four categories:

- small-quantity handler of universal waste (SQHUW),
- large-quantity handler of universal waste (LQHUW),
- transporter of universal waste, or
- final destination facilities.

In addition, the rules establish a petitioning procedure whereby additional wastes may be added to the universal waste rule.

**U.S.C.A.**—*United States Code Annotated*.

**Used oil** (30 TAC Section 335.1, 30 TAC Section 324 (relating to used oil), and 40 CFR Part 279 (relating to standards for management of used oil)<sup>2</sup>— Any oil refined from crude oil, or any synthetic oil, that has been used and, from such use, is contaminated by physical or chemical impurities and cannot be used for its intended purpose (that is, it is a spent material).

Used oil fuel includes any fuel produced from used oil by processing, blending, or other treatment.

**Waste**—Unwanted materials left over from a manufacturing process; refuse from places of human or animal habitation.

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<sup>2</sup> Rules applicable to nonhazardous used oil, are found in Chapter 324, state regulations on recyclable used oil, and 40 CFR Part 279, federal regulations on used oil recycling.

**Waste code**—Also referred to as Texas waste code (30 TAC Section 335.503)—This 8-digit code identifies a waste stream. The first 4 digits are the *sequence number*, the next 3 digits are the *form code*, and the last digit is the waste’s *classification* (sequence number + form code + classification code = waste code). (Some of the “digits” referred to here actually may be letters or a combination of letters and numbers.)

**Waste matrices**—Water and soil or sediment in which a waste is found.

**Wastes generated out-of-state** (30 TAC Section 335.508)—All nonhazardous industrial waste generated outside the state of Texas and transported into or through Texas for processing, storage, or disposal

is classified as Class 1 unless the waste satisfies the Class 2 or 3 criteria as defined in 30 TAC Sections 335.506–8. A Class 2 or 3 waste determination, accompanied by all supporting process knowledge and analytical data, must be submitted to the TCEQ for approval.

**Waste stream** (30 TAC Section 335.503)—The total flow of solid waste from homes, businesses, institutions, and manufacturing plants that is recycled, burned, or disposed of in landfills; or segments of that total flow, such as the “residential waste stream” or the “recyclable waste stream.” (It should be noted that the terms “waste stream”, “solid waste”, and “waste” are often used interchangeably by federal and state regulators as well as many members of the regulated community).

# Hazardous Substances

## Applicability: Empty Container Class 2 Evaluations

The following is a listing of materials identified as hazardous substances (40 CFR Table 302.4) in effect at the time of this guideline's printing. (As amended at 57 FR 61492, Dec. 24, 1992; 58 FR 35314, June 30, 1993; 59 FR 31551, June 20, 1994; 60 FR 7824 Feb. 9, 1995). Chemical Abstract Service (CAS) Registry Numbers of the materials are also provided.

Hazardous Substance	CAS Number	Hazardous Substance	CAS Number
Acenaphthene	83329	Ammonium fluoborate	13826830
Acenaphthylene	208968	Ammonium fluoride	12125018
Acetaldehyde	75070	Ammonium hydroxide	1336216
Acetaldehyde, chloro-	107200	Ammonium oxalate	6009707
Acetaldehyde, trichloro-	75876	Ammonium picrate	131748
Acetamide, N-(aminothioxomethyl)-	591082	Ammonium silicofluoride	16919190
Acetamide, N-9H-fluoren-2-yl-	53963	Ammonium sulfamate	7773060
Acetic acid	64197	Ammonium sulfide	12135761
Acetic acid (2,4-dichlorophenoxy)-	94757	Ammonium sulfite	10196040
Acetic anhydride	108247	Ammonium tartrate	14307438
Acetone	67641	Ammonium thiocyanate	1762954
Acetone cyanohydrin	75865	Ammonium vanadate	7803556
Acetonitrile	75058	Amyl acetate	628637
Acetophenone	98862	iso-	123922
2-Acetylaminofluorene	53963	sec-	626380
Acetyl bromide	506967	tert-	625161
Acetyl chloride	75365	Aniline	62533
1-Acetyl-2-thiourea	591082	Anthracene	120127
Acrolein	107028	Antimony	7440360
Acrylamide	79061	Antimony pentachloride	7647189
Acrylic acid	79107	Antimony potassium tartrate	28300745
Acrylonitrile	107131	Antimony tribromide	7789619
Adipic acid	124049	Antimony trichloride	10025919
Aldicarb	116063	Antimony trifluoride	7783564
Aldicarb sulfone	1646884	Antimony trioxide	1309644
Aldrin	309002	Aroclor 1016	12674112
Allyl alcohol	107186	Aroclor 1221	11104282
Allyl chloride	107051	Aroclor 1232	11141165
Aluminum phosphide	20859738	Aroclor 1242	53469219
Aluminum sulfate	10043013	Aroclor 1248	12672296
Ametycin	50077	Aroclor 1254	11097691
(7-amino-9-a-methoxymitosane)		Aroclor 1260	11096825
5-(Aminomethyl)-3-isoxazolol	2763964	Arsenic	7440382
4-Aminopyridine	504245	Arsenic acid H <sub>3</sub> AsO <sub>4</sub>	1327522
Amitrole	61825	Arsenic disulfide	1303328
Ammonia	7664417	Arsenic pentoxide, As <sub>2</sub> O <sub>5</sub>	1303282
Ammonium acetate	631618	Arsenic trichloride	7784341
Ammonium benzoate	1863634	Arsenic trioxide, As <sub>2</sub> O <sub>3</sub>	1327533
Ammonium bicarbonate	1066337	Arsenic trisulfide	1303339
Ammonium bichromate	7789095	Arsinic acid, dimethyl-	75605
Ammonium bifluoride	1341497	Asbestos	1332214
Ammonium bisulfite	10192300	Auramine	492808
Ammonium carbamate	1111780	Azaserine	115026
Ammonium carbonate	506876	1H-Azepine-1-carbothioic acid, hexahydro-, S-ethyl ester	2212671
Ammonium chloride	12125029	Aziridine, 2-methyl	75558
Ammonium chromate	7788989	Barium cyanide	542621
Ammonium citrate, dibasic	3012655	Benz[ <i>c</i> ]acridine	225514

Hazardous Substance	CAS Number	Hazardous Substance	CAS Number
Benzanthracene	56553	Cadmium	7440439
Benz[a]anthracene	57976	Cadmium acetate	543908
Benzene	71432	Cadmium bromide	7789426
Benzene, dichloromethyl-	98873	Cadmium chloride	10108642
Benzene, 2,6-diisocyanato-1-methyl-	91087	Calcium arsenate	7778441
Benzene, m-dimethyl	108383	Calcium arsenite	52740166
Benzene, o-dimethyl	95476	Calcium carbide	75207
Benzene, p-dimethyl	106423	Calcium chromate	13765190
Benzenesulfonic acid chloride	98099	Calcium cyanide Ca(CN) <sub>2</sub>	592018
Benzene, (trichloromethyl)	98077	Calcium dodecylbenzenesulfonate	26264062
Benzidine	92875	Calcium hypochlorite	7778543
Benzo[a]anthracene	56553	Captan	133062
1,3-Benzodioxol-4-ol, 2,2-dimethyl-, (Bendiocarb phenol)	22961826	Carbamic acid, butyl-, 3-iodo-2-n-butylcarbamate)	55406536
1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate (Bendiocarb)	22781233	Carbamic acid, [1-[(butylamino)carbonyl]-1H-benzimidazol-2-yl, methyl ester (Benomyl)	17804352
Benzo[b]fluoranthene	205992	Carbamic acid, 1H-benzimidazol-2-yl, methyl ester	10605217
Benzo(k)fluoranthene	207089	Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butynyl ester	101279
Benzoic acid	65850	Carbamic acid, dimethyl-, 1-[[dimethylamino)carbonyl]-5-methyl-1H-pyrazol-3-yl ester	644644
Benzoic acid, 2-hydroxy-, compound with (3aS-cis)-1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethylpyrrolo-[2,3-b]indol-5-yl methylcarbamate ester (1:1) (Physostigmine salicylate)	57647	Carbamic acid, dimethyl-, 3-methyl-1-(1-methylethyl)-1H-pyrazol-5-yl ester	119380
Benzonitrile	100470	Carbamic acid, methyl-, 3-methylphenyl ester	1129415
Benzo[rs]pentaphene	189559	Carbamic acid, [1,2-phenylenebis-(iminocarbonothioyl)]bis-, dimethyl ester	23564058
Benzo[ghi]perylene	191242	Carbamic acid, phenyl-, 1-methylethyl ester (Propham)	122429
Benzo[a]pyrene	50328	Carbamic acid, methylnitroso-, ethyl ester	615532
p-Benzoquinone	106514	Carbamic chloride, dimethyl-	79447
Benzotrichloride	98077	Carbamodithioic acid, dibutyl-, sodium salt	136301
Benzoyl chloride	98884	Carbamodithioic acid, diethyl-, 2-chloro-2-propenyl ester	95067
Benzyl chloride	100447	Carbamodithioic acid, diethyl-, sodium salt	148185
Beryllium chloride	7787475	Carbamodithioic acid, dimethyl-, potassium salt	128030
Beryllium powder	7440417	Carbamodithioic acid, dimethyl-, sodium salt	128041
Beryllium fluoride	7787497	Carbamodithioic acid, dimethyl-, tetraanhydrosulfide with orthothioselenious acid	144343
Beryllium nitrate	13597994	Carbamodithioic acid, (hydroxymethyl)methyl-, monopotassium salt	51026289
alpha-BHC	319846	Carbamodithioic acid, methyl-, monopotassium salt	137417
beta-BHC	319857	Carbamodithioic acid, methyl-, monosodium salt	137428
delta-BHC	319868	Carbamothioic acid, bis(1-methylethyl)-, S-(2,3,3-trichloro-2-propenyl) ester	2303175
2,2'-Bioxirane	1464535	Carbamothioic acid, bis(2-methylpropyl)-, S-ethyl ester	2008415
Bis(2-chloroethyl) ether	111444		
Bis(2-chloroethoxy)methane	111911		
Bis(dimethylthiocarbamoyl) sulfide	97745		
Bis(2-ethylhexyl) phthalate	117817		
Bromoacetone	598312		
Bromoform	75252		
4-Bromophenyl phenyl ether	101553		
Brucine	357573		
1-Butanol	71363		
2-Butenal	123739		
Butyl acetate	123864		
iso-	110190		
sec-	105464		
tert-	540885		
n-Butyl alcohol	71363		
Butylamine	109739		
iso-	78819		
sec-	513495		
sec-	13952846		
tert-	75649		
Butyl benzyl phthalate	85687		
Butyric acid	107926		
iso-Butyric acid	79312		

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
Carbamothioic acid, butylethyl-, S-propyl ester	1114712	Cupric sulfate, ammoniated	10380297
Carbamothioic acid, cyclohexylethyl-, S-ethyl ester	1134232	Cupric tartrate	815827
Carbamothioic acid, dipropyl-, S-ethyl ester (EPTC)	759944	Cyanides	57125
Carbamothioic acid, dipropyl-, S-(phenylmethyl) ester	52888809	Cyanogen	460195
Carbamothioic acid, dipropyl-, S-propyl ester	1929777	Cyanogen bromide (CN)Br	506683
Carbaryl	63252	Cyanogen chloride	506774
Carbofuran	1563662	Cyclohexane	110827
Carbofuran, phenol	1563388	Cyclohexanone	108941
Carbosulfan	55285148	2-Cyclohexyl-4,6-dinitrophenol	131895
Carbon disulfide	75150	Cyclophosphamide	50180
Carbon oxyfluoride	353504	2,4-D Acid	94757
Carbon tetrachloride	56235	2,4-D (isopropyl) Esters	94111
Chlorambucil	305033		94791
Chlordane	57749		94804
Chlorine	7782505	Butoxyethyl	1320189
Chlornaphazine	494031		1928387
p-Chloroaniline	106478	Isooctyl	1928616
Chlorobenzene	108907	Dichlorophenoxyaceticacid-polyoxybutyl	1929733
Chlorobenzilate	510156		2971382
p-Chloro-m-cresol	59507	Daunomycin	25168267
Chlorodibromomethane	124481	DDD	53467111
Chloroethane	75003	DDE	20830813
2-Chloroethyl vinyl ether	110758	DDT	72548
Chloroform	67663	DDT	72559
Chloromethyl methyl ether	107302	Di- n-butyl phthalate	50293
2-Chloronaphthalene	91587	Diallate	2303164
2-Chlorophenol	95578	Diazinon	333415
4-Chlorophenyl phenyl ether	7005723	Dibenzo[a,h]anthracene	53703
3-Chloropropionitrile	542767	1,2-Dibromo-3-chloropropane	96128
Chlorosulfonic acid	7790945	Dibutylnitrosoamine	924163
4-Chloro-o-toluidine, hydrochloride	3165933	Di-n-butyl phthalate	84742
Chlorpyrifos	2921882	Dicamba	1918009
Chromic acetate	1066304	Dichlobenil	1194656
Chromic acid	11115745	Dichlone	117806
Chromic sulfate	10101538	Dichlorobenzene	25321226
Chromium	7440473	1,2-Dichlorobenzene	95501
Chromous chloride	10049055	1,3-Dichlorobenzene	541731
Chrysene	218019	1,4-Dichlorobenzene	106467
Cobaltous bromide	7789437	3,3'-Dichlorobenzidine	91941
Cobaltous formate	544183	Dichlorobromomethane	75274
Cobaltous sulfamate	14017415	1,4-Dichloro-2-butene	764410
Copper	7440508	Dichlorodifluoromethane	75718
Copper, dimethyldithiocarbamate	137291	1,1-Dichloroethane	75343
Copper cyanide CuCN	544923	1,2-Dichloroethane	107062
Coumaphos	56724	1,1-Dichloroethylene	75354
Creosote	8001589	1,2-Dichloroethylene	156605
Cresol(s)	1319773	Dichloroethyl ether	111444
m-Cresol	108394	Dichloroisopropyl	108601
o-Cresol	95487	Dichloromethoxyethane	111911
p-Cresol	106445	Dichloromethyl ether	542881
Cumene	98828	2,4-Dichlorophenol	120832
Cupric acetate	142712	2,6-Dichlorophenol	87650
Cupric acetoarsenite	12002038	Dichlorophenylarsine	696286
Cupric chloride	7447394	Dichloropropane	26638197
Cupric nitrate	3251238	1,1-Dichloropropane	78999
Cupric oxalate	5893663	1,3-Dichloropropane	142289
Cupric sulfate	7758987	1,2-Dichloropropane	78875
		Dichloropropane	8003198
		Dichloropropene	26952238
		2,3-Dichloropropene	78886
		1,3-Dichloropropene	542756

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
2,2-Dichloropropionic acid	75990	Endrin & metabolites	72208
Dichlorvos	62737	Endrin aldehyde	7421934
Dicofol	115322	Epichlorohydrin	106898
Dieldrin	60571	Epinephrine	51434
Diethylamine	109897	Ethanimidithioic acid, 2-	30558431
Diethylarsine	692422	(dimethylamino-N-hydroxy-2-oxo-, methyl ester (A2213))	
1,4-Diethylenedioxiide	123911	Ethanimidithioic acid, 2-	23135220
O,O-Diethyl S-methyl dithiophosphate	3288582	(dimethylamino)-N-[[[(methylamino) carbonyl]oxy]-2-oxo-, methyl ester (Oxamyl)]	
Diethyl-p-nitrophenyl phosphate	311455	Ethanimidithioic acid, N,N'-	59669260
Diethyl-o-phthalate	84662	[thiobis[(methylimino) carbonyloxy]] bis-, dimethyl ester (Thiodicarb)	
O,O-Diethyl O-pyrazinyl phosphorothioate	297972	Ethanol, 2,2'-oxybis-,	5952261
Diethylstilbestrol	56531	dicarbamate (Diethylene glycol, dicarbamate)	
Dihydrosafrole	94586	Ethion	563122
Diisopropylfluorophosphate	55914	Ethyl acetate	141786
3,3'-Dimethoxybenzidine	119904	Ethyl acrylate	140885
Dimethylamine	124403	Ethylbenzene	100414
p-Dimethylamino-azobenzene	60117	Ethyl carbamate	51796
3,3'-Dimethylbenzidine	119937	Ethyl cyanide	107120
1,1-Dimethylhydrazine	57147	Ethylenebisdithiocarbamic acid, salts & esters	111546
1,2-Dimethylhydrazine	540738	Ethylenediamine	107153
alpha,alpha- Dimethylphenethylamine	122098	Ethylenediamine-	60004
2,4-Dimethylphenol	105679	tetraacetic acid (EDTA)	
Dimethyl phthalate	131113	Ethylene dibromide	106934
Dimethyl sulfate	77781	Ethylene glycol	110805
Dinitrobenzene (mixed)	25154545	monoethyl ether	
m-Dinitrobenzene	99650	Ethylene oxide	75218
o-Dinitrobenzene	528290	Ethylenethiourea	96457
p-Dinitrobenzene	100254	Ethylenimine	151564
4,6-Dinitro-o-cresol and salts	534521	Ethyl ether	60297
Dinitrophenol	25550587	Ethyl methacrylate	97632
2,5-Dinitrophenol	329715	Famphur	52857
2,6-Dinitrophenol	573568	Ferric ammonium citrate	1185575
2,4-Dinitrophenol	51285	Ferric ammonium oxalate	2944674
Dinitrotoluene	25321146	Ferric chloride	7705080
3,4-Dinitrotoluene	610399	Ferric fluoride	7783508
2,4-Dinitrotoluene	121142	Ferric nitrate	10421484
2,6-Dinitrotoluene	606202	Ferric sulfate	10028225
Dinoseb	88857	Ferrous ammonium sulfate	10045893
Di-n-octyl phthalate	117840	Ferrous chloride	7758943
1,2-Diphenylhydrazine	122667	Ferrous sulfate	7720787
Diphosphoramide, octamethyl-	152169	Fluoranthene	206440
Diphosphoric acid, tetraethyl ester	107493	Fluorene	86737
Dipropylamine	142847	Fluorine	7782414
Di-n-propylnitrosamine	621647	Fluoroacetamide	640197
Diquat	85007	Fluoroacetic acid, sodium salt	62748
Disulfoton	298044	Formaldehyde	50000
Dithiobiuret	541537	Formic acid	64186
1,3-Dithiolane-2- carboxaldehyde, 2,4-dimethyl-, O-[(methylamino) carbonyl]oxime (Tirpate)	26419738	Fumaric acid	110178
Diuron	330541	Furan	110009
Dodecylbenzenesulfonic acid	27176870	Furfural	98011
Endosulfan	115297	Glauramine	492808
alpha-Endosulfan	959988	Glycidylaldehyde	765344
beta-Endosulfan	33213659	Guanidine, N-methyl-N'-nitro-N-nitroso-	70257
Endosulfan sulfate	1031078	Guthion	86500
Endothall	145733		

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
Heptachlor	76448	Methacrylonitrile	126987
Heptachlor epoxide	1024573	Methanesulfonic acid, ethyl ester	62500
Hexachlorobenzene	118741	Methanimidamide,	23422539
Hexachlorobutadiene	87683	N,N-dimethyl-N'-	
Hexachlorocyclohexane (all isomers)	608731	[3-[[[(methylamino)carbonyl]	
Hexachlorocyclohexane	58899	oxylphenyl]-, monohydrochloride	
(gamma isomer - Lindane)		Methanimidamide,	17702577
Hexachlorocyclopentadiene	77474	N,N-dimethyl-N'-	
Hexachloroethane	67721	[2-methyl-4-[[[(methylamino)	
Hexachlorophene	70304	carbonyl]oxy]phenyl]-	
Hexachloropropene	1888717	Methanol	67561
Hexaethyl tetraphosphate	757584	Methapyrilene	91805
Hydrazine	302012	Methomyl	16752775
Hydrazine, 1,2-diethyl-	1615801	Methoxychlor	72435
Hydrochloric acid	7647010	Methyl bromide	74839
Hydrocyanic acid	74908	1-Methylbutadiene	504609
Hydrofluoric acid	7664393	Methyl chloride	74873
Hydrogen sulfide H <sub>2</sub> S	7783064	Methyl chlorocarbonate	79221
Hydroperoxide, 1-methyl-1-phenylethyl	80159	3-Methylcholanthrene	56495
Indeno(1,2,3-cd)pyrene	193395	4,4'-Methylene(bis)chloroaniline	101144
Iron, tris	14484641	Methylene bromide	74953
(dimethylcarbamodithioato-S,S')-		Methylene chloride	75092
Isobutyl alcohol	78831	Methyl ethyl ketone (MEK)	78933
Isodrin	465736	Methyl ethyl ketone peroxide	1338234
Isophorone	78591	Methyl hydrazine	60344
Isoprene	78795	Methyl iodide	74884
Isopropanolamine	42504461	Methyl isobutyl ketone	108101
dodecylbenzenesulfonate		Methyl isocyanate	624839
Isosafrole	120581	Methylmercaptan	74931
3(2H)-Isoxazolone, 5-(aminomethyl)-	2763964	Methyl methacrylate	80626
Kepone	143500	Methyl parathion	298000
Lasiocarpine	303344	Methylthiouracil	56042
Lead	7439921	Mevinphos	7786347
Lead acetate	301042	Mexacarbate	315184
Lead arsenate	7784409	Mitomycin C	50077
Lead chloride	7758954	Monoethylamine	75047
Lead fluoborate	13814965	Monomethylamine	74895
Lead fluoride	7783462	Naled	300765
Lead iodide	10101630	1-Naphthalenamine	134327
Lead nitrate	10099748	2-Naphthalenamine	91598
Lead phosphate	7446277	Naphthalene	91203
Lead stearate	7428480	1,4-Naphthalenedione	130154
Lead subacetate	1335326	Naphthenic acid	1338245
Lead sulfate	15739807	alpha-Naphthylthiourea	86884
Lead sulfide	1314870	Nickel	7440020
Lead thiocyanate	592870	Nickel ammonium sulfate	15699180
Lithium chromate	14307358	Nickel carbonyl	13463393
Malathion	121755	Nickel chloride	7718549
Maleic acid	110167	Nickel cyanide Ni(CN) <sub>2</sub>	557197
Maleic anhydride	108316	Nickel hydroxide	12054487
Maleic hydrazide	123331	Nickel nitrate	14216752
Manganese dimethyldithiocarbamate	15339363	Nickel sulfate	7786814
Melphalan	148823	Nicotine, & salts	54115
Mercaptodimethur	2032657	Nitric acid	7697372
Mercuric cyanide	592041	p-Nitroaniline	100016
Mercuric nitrate	10045940	Nitrobenzene	98953
Mercuric sulfate	7783359	Nitrogen dioxide NO <sub>2</sub>	10102440
Mercuric thiocyanate	592858	Nitrogen oxide NO	10102439
Mercurous nitrate	10415755	Nitroglycerine	55630
Mercury	7439976	Nitrophenol (mixed)	25154556
Mercury fulminate	628864	m-Nitrophenol	554847

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
o-Nitrophenol	88755	Potassium chromate	7789006
p-Nitrophenol	100027	Potassium cyanide KCN	151508
2-Nitropropane	79469	Potassium hydroxide	1310583
N-Nitrosodiethanolamine	1116547	Potassium permanganate	7722647
N-Nitrosodiethylamine	55185	Potassium silver cyanide	506616
N-Nitrosodimethylamine	62759	Pronamide	23950585
N-Nitrosodiphenylamine	86306	1,3-Propane sultone	1120714
N-Nitrosopyrrolidine	930552	Propanedinitrile	109773
Nitrotoluene	1321126	Propargite	2312358
m-Nitrotoluene	99081	Propargyl alcohol	107197
o-Nitrotoluene	88722	Propionic acid	79094
p-Nitrotoluene	99990	Propionic anhydride	123626
5-Nitro-o-toluidine	99558	n-Propylamine	107108
Osmium tetroxide OsO <sub>4</sub>	20816120	Propylene oxide	75569
Paraformaldehyde	30525894	Pyrene	129000
Paraldehyde	123637	Pyrethrins	121299
Parathion	56382	Pyridine	110861
Pentachlorobenzene	608935	Pyridine, 2-methyl-	109068
Pentachloroethane	76017	Pyrrolo[2,3-b] indol-5-ol, 1,2,3,3a,8,8a-hexahydro-1,3a,8- trimethyl-, methylcarbamate (ester), (3aS-cis)-Physostigmine	57476
Pentachloronitrobenzene	82688	Quinoline	91225
Pentachlorophenol	87865	Reserpine	50555
Perchloroethylene	127184	Resorcinol	108463
Phenacetin	62442	Saccharin and salts	81072
Phenanthrene	85018	Safrole	94597
Phenol	108952	Selenious acid	7783008
Phenol, 3-(1-methylethyl)-, methyl carbamate (m-Cumenyl methylcarbamate)	64006	Selenium	7782492
Phenol, 3-methyl-5- (1-methylethyl)-, methyl carbamate (Promecarb)	2631370	Selenium dioxide	7446084
Phenylmercury acetate	62384	Selenium sulfide SeS <sub>2</sub>	7488564
Phenylthiourea	103855	Selenourea	630104
Phorate	298022	Silver	7440224
Phosgene	75445	Silver cyanide AgCN	506649
Phosphine	7803512	Silver nitrate	7761888
Phosphoric acid	7664382	Silvex (2,4,5-TP)	93721
Phosphorodithioic acid, O,O-dimethyl S- [2(methylamino)-2-oxoethyl] ester	60515	Sodium	7440235
Phosphorus	7723140	Sodium arsenate	7631892
Phosphorus oxychloride	10025873	Sodium arsenite	7784465
Phosphorus pentasulfide	1314803	Sodium azide	26628228
Phosphorus trichloride	7719122	Sodium bichromate	10588019
Phthalic anhydride	85449	Sodium bifluoride	1333831
Piperidine, 1-nitroso-	100754	Sodium bisulfite	7631905
Piperidine, 1,1'- (tetrathiodicarbonothioyl)bis- (Bis(pentamethylene)thiuram tetrasulfide)	120547	Sodium chromate	7775113
Polychlorinated biphenyls (PCBs)	1336363	Sodium cyanide NaCN	143339
Aroclor 1016	12674112	Sodium dodecyl- benzenesulfonate	25155300
Aroclor 1221	11104282	Sodium fluoride	7681494
Aroclor 1232	11141165	Sodium hydrosulfide	16721805
Aroclor 1242	53469219	Sodium hydroxide	1310732
Aroclor 1248	12672296	Sodium hypochlorite	7681529
Aroclor 1254	11097691	Sodium methylate	124414
Aroclor 1260	11096825	Sodium nitrite	7632000
Potassium arsenate	7784410	Sodium phosphate, dibasic	7558794
Potassium arsenite	10124502	Sodium phosphate, tribasic	7601549
Potassium bichromate	7778509	Sodium selenite	10102188
		Streptozotocin	18883664
		Strontium chromate	7789062
		Strychnine, & salts	57249
		Styrene	100425
		Sulfur monochloride	12771083

*Appendix A – Hazardous Substances*

<b>Hazardous Substance</b>	<b>CAS Number</b>	<b>Hazardous Substance</b>	<b>CAS Number</b>
Sulfuric acid	7664939	Trichloroethene (Trichloroethylene)	79016
2,4,5-T acid	93765	Trichloromethanesulfonyl chloride	594423
2,4,5-T amines	2008460	Trichloromonofluoromethane	75694
	1319728	Trichlorophenol	25167822
	3813147	2,3,4-Trichlorophenol	15950660
	6369966	2,3,5-Trichlorophenol	933788
	6369977	2,3,6-Trichlorophenol	933755
2,4,5-T (n-butyl) esters	93798	3,4,5-Trichlorophenol	609198
	1928478	2,4,5-Trichlorophenol	95954
	2545597	2,4,6-Trichlorophenol	88062
Isooctyl	25168154	Triethanolamine	27323417
Methylpropyl	61792072	dodecylbenzenesulfonate	
2,4,5-T salts	13560991	Triethylamine	121448
1,2,4,5-Tetrachlorobenzene	95943	Trimethylamine	75503
2,3,7,8-Tetrachloro-	1746016	1,3,5-Trinitrobenzene	99354
dibenzo-p-dioxin (TCDD)		Tris(2,3-dibromopropyl)phosphate	126727
1,1,1,2-Tetrachloroethane	630206	Trypan blue	72571
1,1,2,2-Tetrachloroethane	79345	Uracil mustard	66751
2,3,4,6-Tetrachlorophenol	58902	Uranyl acetate	541093
Tetraethyllead	78002	Uranyl nitrate	10102064
Tetraethylthiopyrophosphate	3689245	Urea, N-ethyl-N-nitroso-	759739
Tetrahydrofuran	109999	Urea, N-methyl-N-nitroso-	684935
Tetranitromethane	509148	Vanadium pentoxide	1314621
Thallium	7440280	Vanadyl sulfate	27774136
Thallium(I) acetate	563688	Vinyl chloride	75014
Thallium(I) carbonate	6533739	Vinyl acetate	108054
Thallium chloride TlCl	7791120	Vinylamine, N-methyl-N-nitroso-	4549400
Thallium(I) nitrate	10102451	Warfarin, and salts, when present at	81812
Thallium oxide Tl <sub>2</sub> O <sub>3</sub>	1314325	concentrations greater than 0.3%	
Thallium selenite	12039520	Xylene (mixed)	1330207
Thallium(I) sulfate	7446186	Xylenol	1300716
2H-1,3,5-Thiadiazine-2-thione,	533744	Zinc	7440666
tetrahydro-3,5-dimethyl- (Dazomet)		Zinc acetate	557346
Thioacetamide	62555	Zinc ammonium chloride	52628258
Thiofanox	39196184	Zinc, bis(dimethyl	137304
Thioperoxydicarbonic diamide,	1634022	carbomodithioato-S,S')- (Ziram)	
tetrabutyl (Tetrabutylthiuram disulfide)		Zinc, bis(diethylcarbamo	14324551
Thioperoxydicarbonic diamide,	97778	dithioato-S,S')- (Ethyl Ziram)	
tetraethyl (Disulfiram)		Zinc borate	1332076
Thiophenol	108985	Zinc bromide	7699458
Thiosemicarbazide	79196	Zinc carbonate	3486359
Thiourea	62566	Zinc chloride	7646857
Thiourea, (2-chlorophenyl)-	5344821	Zinc cyanide Zn(CN) <sub>2</sub>	557211
Thiram	137268	Zinc fluoride	7783495
Toluene	108883	Zinc formate	557415
Toluenediamine	95807	Zinc hydrosulfite	7779864
Toluene diisocyanate	584849	Zinc nitrate	7779886
o-Toluidine	95534	Zinc phenolsulfonate	127822
p-Toluidine	106490	Zinc phosphide Zn <sub>3</sub> P <sub>2</sub> ,	1314847
o-Toluidine	636215	when present at concentrations	
hydrochloride		greater than 10%	
Toxaphene	8001352	Zinc silicofluoride	16871719
2,4,5-TP esters	32534955	Zinc sulfate	7733020
Trichlorfon	52686	Zirconium nitrate	13746899
1,2,4-Trichlorobenzene	120821	Zirconium potassium fluoride	16923958
1,1,1-Trichloroethane	71556	Zirconium sulfate	14644612
1,1,2-Trichloroethane	79005	Zirconium tetrachloride	10026116

# Ignitable Solids

(30 TAC Chapter 335 Subchapter R Appendix 1 Table 2)

Constituents listed from Department of Transportation Regulations, 49 CFR Part 173 Subpart E, October 1, 1993. Note: The presence of a constituent on this table in a nonhazardous waste does not automatically identify that waste as a Class 1 ignitable waste. The constituents on this table are examples of materials which could be considered Class 1 ignitable waste. The physical characteristics of the waste will be the determining factor as to whether or not a waste is ignitable. Refer to 30 TAC §335.505(2) (relating to Class 1 Waste Determination) for the Class 1 ignitable criteria.

Compound or Material	Compound or Material
Aluminum, metallic, powder	Celluloid
Alkali metal amalgams	Cerium
Alkali metal amides	Cesium metal
Aluminum alkyl halides	Chromic acid or chromic acid mixture, dry
Aluminum alkyl hydrides	Cobalt naphthenates, powder
Aluminum alkyls	Cobalt resinate
Aluminum borohydrides	Decaborane
Aluminum carbide	2-Diazo-1-naphthol-4-sulphochloride
Aluminum ferrosilicon powder	2-Diazo-1-naphthol-5-sulphochloride
Aluminum hydride	2,5-Diethoxy-4-morpholinobenzene-diazonium zinc choride
Aluminum phosphide	Diethylzinc
Aluminum resinate	4-Dimethylamino-6-(2-dimethylaminoethoxy)-toluene-2-diazonium zinc chloride
Aluminum silicon powder	Dimethylzinc
Ammonium picrate	Dinitrophenolates
2,2'-Azodi(2,4-dimethyl-4-methoxyvaleronitrile)	Dinitroresorcinol
2,2'-Azodi(2,4-dimethylvaleronitrile)	N,N'-Dinitroso-N,N'-dimethylterephthalamide
1,1' Azodi(hexahydrobenzonitrile)	N,N'-Dinitrosopentamethylenetetramine
2,2'-Azodi(2-methyl-butryronitrile)	Diphenyloxide-4,4'-disulfohydrazide
Azodiisobutyronitrile	Dipicryl sulfide
Barium, metallic	4-Dipropylaminobenzenediazonium zinc chloride
Barium alloys, pyrophoric	Ferrocium
Barium azide	Ferrosilicon
Benzene-1,3-disulfohydrazide	Ferrous metal
Benzene sulfohydrazide	Hafnium powder
4-(Benzyl(ethyl)amino)-3-ethoxy-benzenediazonium zinc chloride	Hexamine
4-(Benzyl(methyl)amino)-3-ethoxy-benzenediazonium zinc chloride	Hydrides, metal
Borneol	3-(2-Hydroxyethoxy)-4-pyrrolidin-1-ylbenzenediazonium zinc chloride
Boron trifluoride dimethyl etherate	Iron oxide, spent
5-tert-Butyl-2,4,6-trinitro-m-xylene	Isosorbide dinitrate mixture
Calcium, metallic	Lead phosphite, dibasic
Calcium carbide	Lithium acetylide-ethylene diamine complex
Calcium chlorite	Lithium alkyls
Calcium cyanamide	Lithium aluminum hydride
Calcium dithionite	Lithium amide, powdered
Calcium hypochlorite	Lithium borohydride
Calcium manganese silicon	Lithium ferrosilicon
Calcium silicon powder	Lithium hydride
Calcium phosphide	Lithium metal
Calcium pyrophoric	Lithium nitride
Calcium resinate	Lithium silicon
Calcium silicide	Magnesium granules
Camphor, synthetic	Magnesium aluminum phosphide
Carbon, activated	

*Appendix B – Ignitable Solids*

Compound or Material	Compound or Material
Magnesium diamide	Sodium aluminum hydride
Magnesium phosphide	Sodium amide
Magnesium silicide	Sodium borohydride
Maneb	Sodium chlorite
Manganese resinate	Sodium 2-diazo-1-naphthol-4-sulphonate
Methyl magnesium bromide	Sodium 2-diazo-1-naphthol-5-sulphonate
Methyldichlorosilane	Sodium dichloro-s-triazinetrione
Mono-(trichloro)tetra(monopotassium dichloro)- penta-s-triazinetrione	Sodium dinitro-ortho-cresolate
N-Methyl-N'-nitronitrosoguanidine	Sodium hydride
Naphthalene	Sodium hydrosulfite
Nitrocellulose mixtures	Sodium methyrate
Nitroguanidine	Sodium nitrite and mixtures
p-Nitrosodimethylaniline	Sodium picramate, wet
Paraformaldehyde	Sodium potassium alloys
Pentaborane	Sodium sulfide, anhydrous
Peratic acid	Stannic phosphide
Phosphorous, amorphous, red	Strontium phosphide
Phosphorous, white or yellow	Sulfur
Phosphoric anhydride	Titanium metal powder
Phosphorous pentachloride	Titanium hydride
Phosphorus pentasulfide	Trichloroisocyanuric acid
Phosphorus sesquisulfide	Trichlorosilane
Phosphorus trisulfide	Trichloro-s-triazinetrione
Picric acid	Trinitrobenzoic acid
Potassium, metallic	Trinitrophenol
Potassium dichloro-s-triazinetrione	Trinitrotoluene
Potassium borohydride	Urea nitrate
Potassium dithionite	Zinc ammonium nitrite
Potassium phosphide	Zinc phosphide
Potassium sulfide, anhydrous	Zinc powder
Rubidium metal	Zinc resinate
Silicon powder, amorphous	Zirconium hydride, powdered
Silver picrate	Zirconium picramate
Sodium, metallic	Zirconium powder
	Zirconium scrap

# Class 1 Toxic Constituents' Maximum Leachable Concentrations

(30 TAC Chapter 335 Subchapter R Appendix 1 Table 1)

## Applicability: Class 1, 2, and 3 Waste Evaluations

Values are based on information contained in Federal Registers Vol. 55 / Friday, July 27, 1990; Vol. 56 / June 7, 1991; and Integrated Risk Information Systems, Environmental Protection Agency, and 40 CFR 264 Appendix 9.

Compound	CAS No.	Concentration (mg/l)	Compound	CAS No.	Concentration (mg/l)
Acenaphthene	83-32-9	210	Dieldrin	60-57-1	0.02
Acetone	67-64-1	400	Diethyl phthalate	84-66-2	3000
Acetonitrile	75-05-8	20	Dimethoate	60-51-5	70
Acetophenone	98-86-2	400	2,4-Dimethyphenol	105-67-9	70
Acrylamide	79-06-1	0.08	2,6-Dimethyphenol	576-26-1	21
Acrylonitrile	107-13-1	0.6	m-Dinitrobenzene	99-65-0	0.4
Aniline	62-53-3	60	2,4-Dinitrophenol	51-28-5	7
Anthracene	120-12-7	1050	2,4-Dinitrotoluene	602-01-7	0.13
Antimony	7440-36-0	1	(and 2,6-, mixture)		
Arsenic	7440-38-2	1.8	Dinoseb	88-85-7	3.5
Barium	7440-39-3	100.0	1,4-Dioxane	123-91-1	30
Benzene	71-43-2	0.50	Dioxins (Polychlorinated dibenzo-p-dioxins)		
Benzidine	92-87-5	0.002	2,3,7,8-TCDD	1746-01-6	0.005
Beryllium	7440-41-7	0.08	1,2,3,7,8-PeCDD	40321-76-4	0.010
Bis(2-chloroethyl) ether	111-44-4	0.3	1,2,3,4,7,8-HxCDD	57653-85-7	0.050
Bis(2-ethylhexyl) phthalate	117-81-7	30	1,2,3,6,7,8-HxCDD	34465-46-8	0.050
Bromodichloromethane	75-27-4	0.3	1,2,3,7,8,9-HxCDD		0.050
Bromomethane	74-83-9	5	Diphenylamine	122-39-4	90
Butylbenzyl phthalate	85-68-7	700	1,2-Diphenylhydrazine	122-66-7	0.4
Cadmium	7440-43-9	0.5	Disulfoton	298-04-4	0.1
Carbon disulfide	75-15-0	400	Endosulfan	959-98-8	0.2
Carbon tetrachloride	56-23-5	0.50	Endrin	72-20-8	.02
Chlordane	57-74-9	0.03	2-Ethoxyethanol	10-80-5	1400
Chlorobenzene	108-90-7	70	Ethylbenzene	100-41-4	400
Chloroform	67-66-3	6.0	Ethylene dibromide	106-93-4	0.004
Chloro-m-cresol, p	59-50-7	7000	Ethylene glycol	107-21-1	7000
2-Chlorophenol	95-57-8	20	Fluoranthene	206-44-0	140
Chromium	7440-47-3	5.0	Fluorene	86-73-7	140
m-Cresol	108-39-4	200.0*	Furans (Polychlorinated dibenzofurans)		
o-Cresol	95-48-7	200.0*	2,3,7,8-TCDF	51207-31-9	0.050
p-Cresol	106-44-5	200.0*	1,2,3,7,8-PeCDF		0.100
DDD	72-54-8	1	2,3,4,7,8-PeCDF		0.010
DDE	72-55-9	1	1,2,3,4,7,8-HxCDF		0.050
DDT	50-29-3	1	1,2,3,6,7,8-HxCDF		0.050
Dibutyl phthalate	84-74-2	400	1,2,3,7,8,9-HxCDF		0.050
1,4-Dichlorobenzene	106-46-7	7.5	Heptachlor	76-44-8	0.008
3,3-Dichlorobenzidine	91-94-1	0.8	Heptachlor epoxide	1024-57-3	0.04
1,2-Dichloroethane	107-06-2	0.50	Hexachlorobenzene	118-74-1	0.13
Dichlorodifluoromethane	75-71-8	700	Hexachloro-1,3-butadiene	87-68-3	0.4
1,1-Dichloroethylene	75-35-4	0.6	Hexachlorocyclopentadiene	77-47-4	20
1,3-Dichloropropene	542-75-6	1	Hexachloroethane	67-72-1	3.0
2,4-Dichlorophenol	120-83-2	10	Hexachlorophene	70-30-4	1
2,4-Dichlorophenoxy- acetic acid (2,4-D)	94-75-7	10.0	Isobutyl alcohol	78-83-1	1000
			Isophorone	78-59-1	90

*Appendix C – Class 1 Toxic Constituents’  
Maximum Leachable Concentrations (MCLs)*

<b>Compound</b>	<b>CAS No.</b>	<b>Concentration (mg/l)</b>	<b>Compound</b>	<b>CAS No.</b>	<b>Concentration (mg/l)</b>
Lead	7439-92-1	1.5	Pyridine	110-86-1	4
Lindane	58-89-9	0.3	Selenium	7782-49-2	1.0
Mercury	7439-97-6	0.2	Silver	7440-22-4	5.0
Methacrylonitrile	126-98-7	0.4	Styrene	100-42-5	700
Methomyl	16752-77-5	90	1,1,1,2-Tetrachloroethane	630-20-6	10
Methoxychlor	72-43-5	10.0	1,1,2,2-Tetrachloroethane	79-34-5	2
2-Methoxyethanol	109-86-4	14.0	Tetrachloroethylene	127-18-4	0.7
Methyl ethyl ketone	78-93-3	200.0	2,3,4,6-Tetrachlorophenol	58-90-2	100
Methyl isobutyl ketone	108-10-1	200	Toluene	108-88-3	1000
Methylene chloride	75-09-2	50	Toxaphene	8001-35-2	0.3
Methyl parathion	298-00-0	0.9	trans-1,3-Dichloropropene	542-75-6	1
Mirex	2385-85-5	0.7	Tribromomethane (Bromoform)	75-25-2	70
Nickel	7440-02-0	70	1,2,4-Trichlorobenzene	120-82-1	70
Nitrobenzene	98-95-3	2.0	1,1,1-Trichloroethane	71-55-6	300
N-Nitroso-di-n-butylamine	924-16-3	0.06	Trichloroethylene	79-01-6	0.5
N-Nitrosodiphenylamine	86-30-6	70	1,1,2-Trichloroethane	79-00-5	6
N-Nitrosomethylethylamine	10595-95-6	0.02	Trichlorofluoromethane	75-69-4	1000
N-Nitroso-n-propylamine	621-64-7	0.05	2,4,5-Trichlorophenoxy- propionic acid (2,4,5-TP or Silvex)	93-72-1	1.0
N-Nitrosopyrrolidine	930-55-2	0.2	1,2,3-Trichloropropane	96-18-4	20
p-Phenylenediamine	106-50-3	20	2,4,5-Trichlorophenol	95-95-4	400.0
Parathion	56-38-2	20	2,4,6-Trichlorophenol	88-06-2	2
Pentachlorobenzene	608-93-5	3	Vanadium pentoxide	1314-62-1	30
Pentachloronitrobenzene	82-68-8	10	Vinyl chloride	75-01-4	0.2
Pentachlorophenol	87-86-5	100.0	Xylenes (all isomers)	1330-82-1	7000
Phenol	108-95-2	2000			
Pronamide	23950-58-5	300			
Pyrene	129-00-0	5.9			

\* If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.  
The Maximum Concentration for total cresol is 200.0 mg/l.

# 7-Day Distilled Water Leachate Test's Maximum Contaminant Levels

(30 TAC Chapter 335 Subchapter R APPENDIX 1 Table 3)

Applicability: **Class 3 Waste Evaluations**

Values obtained from 40 Code of Federal Regulations Part 141, Subparts B and G, Maximum Contaminant Levels and 40 Code of Federal Regulations Part 143, Total Dissolved Solids.

Constituent	MCL (mg/l)
Arsenic	0.05
Barium	1
*Benzene	0.005
Cadmium	0.005
*Carbon tetrachloride	0.005
Chlordane	0.002
*Chlorobenzene	0.1
Chromium	0.1
2,4-D	0.07
*Dibromochloropropane	0.0002
*ortho-Dichlorobenzene	0.6
*para-Dichlorobenzene	0.075
*1,2-Dichloroethane	0.005
*1,1-Dichloroethylene	0.007
*trans-1,2-Dichloroethylene	0.1
*1,2-Dichloropropane	0.005
*Ethylbenzene	0.7
Heptachlor	0.0004
Heptachlor epoxide	0.0002
Lead	0.05
Mercury	0.002
Methoxychlor	0.04
Pentachlorophenol	0.001
Selenium	0.05
Silver	0.05
*Styrene	0.1
*Tetrachloroethylene	0.005
*1,1,1-Trichloroethane	0.20
*Trichloroethylene	0.005
*Toluene	1
Toxaphene	0.003
2,4,5-TP (Silvex)	0.05
*Vinyl chloride	0.002
*Xylenes (total)	10
Total dissolved solids	500

\* For a Class 3 waste classification, these constituents must also be evaluated using the test methods described in 40 Code of Federal Regulations, Part 261, Appendix II. See §335.507 (4) (A) (ii) for additional information.

# Class 1 Toxic Constituents

(other than those identified in Appendix C, and their Estimated Quantitation Limits [EQLs])

## Applicability: Class 3 Waste Evaluations

This table is to be utilized by the generator in evaluating detection limits for the identified constituents. The EQLs in this table are defined as the lowest detectable levels that can be reliably achieved using the Toxicity Characteristic Leaching Procedure (TCLP) at the time of the printing of this guideline. Applicable EPA method numbers are provided and can be found in EPA Report SW-846 "Test Methods for Evaluating Solid Waste" except where noted. Please note that more than one test method may be available for a particular constituent. Synonyms are provided in brackets "[ ]".

Constituent	EQL (mg/l)	Method(s)	Constituent	EQL (mg/l)	Method(s)
Acenaphthene	0.2	8100	Chloroform	0.0005	8010
	0.01	8270		0.005	8240
	0.02	8250		0.005	8040
Acetone	0.1	8240	p-Chloro-m-cresol	0.02	8270
	0.1	8015	2-Chlorophenol	0.003	8040
Acetonitrile	0.1	8015	[o-Chlorophenol]	0.01	8270
[Methyl cyanide]	0.1	8030	m-Cresol	0.01	8270
Acetophenone	0.001	8250	o-Cresol	0.01	8270
	0.01	8270	p-Cresol	0.01	8270
Acrylamide	0.005	8015	DDD [Dichlorodiphenyl-	0.0001	8080
Acrylonitrile	0.005	8030	dichloroethane]	0.028	8250
[Vinyl cyanide]	0.005	8240		0.01	8270
Anthracene	0.2	8100	DDE [Dichlorodiphenyl-	0.00004	8080
	0.02	8250	ethylene]	0.056	8250
	0.01	8270		0.01	8270
Aniline	0.01	8250	DDT [Dichlorodiphenyl-	0.0001	8080
[Benzyl amine]	0.01	8270	trichloroethane]	0.047	8250
Antimony	0.2	204		0.01	8270
	0.3	6010	Dibutyl phthalate	0.005	8060
	2.0	7040		0.01	8270
	0.03	7041	1,4-Dichlorobenzene	0.004	8010
	2.0	7000A		0.003	8020
Benzidine [Dianiline]	0.44	8250		0.013	8120
Beryllium	**	210		0.01	8270
	0.003	6010	3,3-Dichlorobenzidine	0.02	8270
	0.05	7090	Dichlorodifluoromethane	0.01	8010
	0.002	7091		0.005	8240
	0.05	7000A	1,3-Dichloropropene	0.003	8010
Bis(2-chloroethyl) ether	0.057	8250		0.005	8240
[Dichloroethyl ether]	0.01	8270	2,4-Dichlorophenol	0.05	8040
Bis(2-ethylhexyl)	0.02	8060		0.01	8270
phthalate	0.25	8250	Dieldrin	0.00002	8080
	0.01	8270		0.01	8270
Bromodichloromethane	0.001	8010	Diethyl phthalate	0.005	8060
	0.005	8240		0.01	8270
Bromomethane	0.003	8010	Dimethoate	0.02	8270
[Methylbromide]	0.01	8240	2,4-Dimethylphenol	0.003	8040
Butylbenzyl phthalate	0.005	8060		0.01	8270
[Benzylbutyl phthalate]	0.025	8250	2,6-Dimethylphenol	**	**
	0.01	8270	m-Dinitrobenzene	0.01	8270
Carbon disulfide [CS <sub>2</sub> ]	0.005	8240			

Constituent	EQL (mg/l)	Method(s)	Constituent	EQL (mg/l)	Method(s)
2,4-Dinitrophenol	0.13	8040	Methyl ethyl ketone [MEK]	0.01	8015
	0.05	8270		0.1	8240
2,4-Dinitrotoluene	0.0002	8090	Methyl isobutyl ketone [MIBK]	**	8015
(and 2,6-, mixture)	0.01	8270		0.005	8240
Dinoseb	0.007	8150	Methylene chloride	0.005	8010
	0.02	8270	[Dichloromethane]	0.005	8240
1,4-Dioxane	0.15	8015	Methyl parathion	0.0003	8140
Dioxins (Polychlorinated dibenzo-p-dioxins)				0.01	8270
2,3,7,8-TCDD	0.000005	8280	Mirex	**	**
1,2,3,7,8-PeCdd	0.00001	8280	Nickel	0.04	249
1,2,3,4,7,8-HxCDD	0.00001	8280		0.05	6010
1,2,3,6,7,8-HxCDD	0.00001	8280		0.4	7520
1,2,3,7,8,9-HxCDD	0.00001	8280		0.04	7000A
Diphenylamine	0.01	8270	Nitrobenzene	0.04	8090
1,2-Diphenylhydrazine	0.2	1625		0.01	8250
Disulfoton	0.002	8140		0.01	8270
	0.01	8270	N-Nitroso-di-n-butylamine	0.01	8270
Endosulfan	0.0001	8080	N-Nitrosodiphenylamine	0.01	8270
	0.056	8250	N-Nitrosomethylethylamine	0.02	8270
Endrin	0.00006	8080	N-Nitroso-n-propylamine	0.01	8270
	0.01	8250	N-Nitrosopyrrolidine	0.01	8270
2-Ethoxyethanol	**	**	p-Phenylenediamine	0.01	8270
Ethylene dibromide [EDB]	0.5	6231	Parathion	0.01	8270
(Standard Methods for Examination of Water and Wastewater)				0.0003	8140
Ethylene glycol	**	**	Pentachlorobenzene	0.02	8270
Fluoranthene	0.2	8100	Pentachloronitrobenzene	0.01	8270
	0.01	8270	Phenol	0.001	8040
Fluorene	0.2	8100		0.01	8270
	0.01	8270	Pronamide	0.01	8270
Furans (Polychlorinated dibenzofurans)			Pyrene	0.2	8100
2,3,7,8-TCDF	0.00001	8280		0.01	8270
1,2,3,7,8-PeCDF	0.00001	8280	Pyridine	0.005	8240
2,3,4,7,8-PeCDF	0.00001	8280		0.01	8270
1,2,3,4,7,8-HxCDF	0.00001	8280	1,1,1,2-Tetrachloroethane	0.005	8010
1,2,3,6,7,8-HxCDF	0.00001	8280		0.005	8240
1,2,3,7,8,9-HxCDF	0.00001	8280	1,1,2,2-Tetrachloroethane	0.0003	8010
Hexachlorobenzene	0.0005	8120		0.005	8240
	0.0	8270	2,3,4,6-Tetrachlorophenol	0.01	8270
Hexachloro-1,3-butadiene	0.0034	8120	trans-1,3-Dichloropropene	0.0034	8010
	0.01	8270		0.005	8240
Hexachlorocyclopentadiene	0.004	8120	Tribromomethane [Bromoform]	0.002	8010
	0.01	8270		0.005	8240
Hexachloroethane	0.0003	8120	1,2,4-Trichlorobenzene	0.01	8270
	0.01	8270	1,1,2-Trichloroethane	0.0002	8010
Hexachlorophene	0.05	8270	[1,1,2-TCE]	0.005	8240
Isobutyl alcohol	0.05	8015	Trichlorofluoromethane	0.01	8010
Isophorone	0.06	8090	[Freon 11]	0.005	8240
	0.01	8270	1,2,3-Trichloropropane	0.01	8010
Lindane	0.00004	8080		0.005	8240
	0.01	8250	2,4,5-Trichlorophenol	0.01	8270
	0.00004	608	2,4,6-Trichlorophenol	0.006	8040
	0.01	625		0.01	8270
Methacrylonitrile	0.005	8015	Vanadium pentoxide	0.2	286
Methomyl	0.09	632		0.08	6010
2-Methoxyethanol	**	**		2.0	7910
				0.04	7911

\* If o-, m-, and p-cresol concentrations cannot be differentiated, the total cresol concentration is used.

\*\* This information not available at time of publication.

# 7-Day Distilled Water Leachate Test Procedure

(30 TAC Chapter 335 Subchapter R Appendix 4)

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Applicability: **Class 3 Waste Evaluations**

This test is intended only for dry, solid wastes, i.e., waste materials without any free liquids.

1. Place a 250 gram (dry weight) representative sample of the waste material in a 1500 milliliter Erlenmeyer flask.
2. Add 1 liter of deionized or distilled water into the flask and mechanically stir the material at a low speed for five (5) minutes.
3. Stopper the flask and allow to stand for seven (7) days.
4. At the end of seven (7) days, filter the supernatant solution through a 0.45 micron filter, collecting the supernatant into a separate flask.
5. Subject the filtered leachate to the appropriate analysis.

# Form Codes

(30 TAC Chapter 335 Subchapter R Appendix 3)

Applicability: **All Waste**

In determining a waste stream's form code, it is recommended that the generator first determine into which major category the waste stream fits (e.g. inorganic liquids). The generator should then review all the form code descriptors in that category to determine which code or codes best describe the generator's waste stream. The generator should then choose, from the narrowed-down list, a form code for the waste stream.

Form codes are fairly generic in their descriptions. It is possible that more than one form code may be applicable to a particular waste stream. Generators should assign the form code which best describes the waste stream. If more than one form code can "best describe" the waste stream, then the generator should choose one of those several codes.

Code	Waste Description	Code	Waste Description
<b>— Lab Packs —</b>			
<i><b>Lab Packs</b> — Lab packs of mixed wastes, chemicals, lab wastes</i>		113	Other aqueous waste with high dissolved solids
001	Lab packs of old chemicals only	114	Other aqueous waste with low dissolved solids
002	Lab packs of debris only	115	Scrubber water
003	Mixed lab packs	116	Leachate
004	Lab packs containing acute hazardous wastes	117	Waste liquid mercury
009	Other lab packs (Specify in Comments)	119	Other inorganic liquids (Specify in Comments)
		198	Nonhazardous photographic chemical wastes (inorganic)
		199	Brine solution that could also bear the form code 113
<b>— Liquids —</b>			
<i><b>Inorganic Liquids</b> — Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content</i>		<i><b>Organic Liquids</b> — Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content</i>	
101	Aqueous waste with low solvents	201	Concentrated solvent-water solution
102	Aqueous waste with low other toxic organics	202	Halogenated (e.g., chlorinated) solvent
103	Spent acid with metals	203	Non-halogenated solvent
104	Spent acid without metals	204	Halogenated/non-halogenated solvent mixture
105	Acidic aqueous waste	205	Oil-water emulsion or mixture
106	Caustic solution with metals but no cyanides	206	Waste oil
107	Caustic solution with metals and cyanides	207	Concentrated aqueous solution of other organics
108	Caustic solution with cyanides but no metals	208	Concentrated phenolics
109	Spent caustic	209	Organic paint, ink, lacquer, or varnish
110	Caustic aqueous waste	210	Adhesives or epoxies
111	Aqueous waste with reactive sulfides	211	Paint thinner or petroleum distillates
112	Aqueous waste with other reactives (e.g., explosives)	212	Reactive or polymerizable organic liquids
		219	Other organic liquids (Specify in Comments)
		296	Ethylene glycol based antifreeze

*Appendix G – Form Codes*

Code	Waste Description	Code	Waste Description
297	Nonhazardous liquids containing greater than or equal to (>) 50 and less than (<) 500 ppm PCBs	397	Nonhazardous electrical equipment/devices containing greater than or equal to (>) 500 ppm PCBs
298	Nonhazardous liquids containing greater than or equal to (>) 500 ppm PCBs	398	Nonhazardous soils containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
299	Nonhazardous photographic chemical waste (organic)	399	Nonhazardous soils containing greater than or equal to (>) 500 ppm PCBs
<b>— Solids —</b>			
<i>(These codes <b>do not</b> apply to pumpable waste.)</i>			
<b>Inorganic Solids</b> — Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; <b>not pumpable</b>		<b>Organic Solids</b> — Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; <b>not pumpable</b>	
301	Soil contaminated with organics	401	Halogenated pesticide solid
302	Soil contaminated with inorganics only	402	Non-halogenated pesticide solid
303	Ash, slag, or other residue from incineration of wastes	403	Solids resins or polymerized organics
304	Other “dry” ash, slag, or thermal residue	404	Spent carbon
305	“Dry” lime or metal hydroxide solids chemically “fixed”	405	Reactive organic solid
306	“Dry” lime or metal hydroxide solids not “fixed”	406	Empty fiber or plastic containers
307	Metal scale, filings, or scrap	407	Other halogenated organic solids (Specify in Comments)
308	Empty or crushed metal drums or containers	409	Other non-halogenated organic solids (Specify in Comments)
309	Batteries or battery parts, casings, cores	488	Wood debris
310	Spent solid filters or adsorbents	489	Petroleum contaminated solids
311	Asbestos solids and debris	490	Sand blasting waste
312	Metal-cyanide salts/chemicals	491	Dewatered biological treatment sludge
313	Reactive cyanide salts/chemicals	492	Dewatered sewage or other untreated biological sludge
314	Reactive sulfide salts/chemicals	493	Catalyst waste
315	Other reactive salts/chemicals	494	Solids containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
316	Other metal salts/chemicals	495	Solids containing greater than or equal to (>) 500 ppm PCBs
319	Other waste inorganic solids (Specify in Comments)	496	Electrical equipment/devices containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
388	Empty or crushed glass containers	497	Electrical equipment/devices containing greater than or equal to (>) 500 ppm PCBs
389	Nonhazardous sandblasting waste	498	Soil containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs
390	Nonhazardous concrete/cement/ construction debris	499	Soils containing greater than or equal to (>) 500 ppm PCBs
391	Nonhazardous dewatered wastewater treatment sludge		
392	Nonhazardous dewatered air pollution control device sludge	<b>— Sludges —</b>	
393	Catalyst waste	<i>(These codes only apply to pumpable waste.)</i>	
394	Nonhazardous solids containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs	<b>Inorganic Sludges</b> — Waste that is primarily inorganic, with moderate-to-high water content and low organic content, and <b>pumpable</b>	
395	Nonhazardous solids containing greater than or equal to (>) 500 ppm PCBs	501	Lime sludge without metals
396	Nonhazardous electrical equipment/devices containing greater than or equal to (>) 50ppm and less than (<) 500 ppm PCBs	502	Lime sludge with metals/metal hydroxide sludge

*Appendix G – Form Codes*

Code	Waste Description	Code	Waste Description
503	Wastewater treatment sludge with toxic organics		<b>— Gases —</b>
504	Other wastewater treatment sludge		<b>Inorganic Gases</b> — Waste that is primarily inorganic with a low organic content and is a gas at atmospheric pressure
505	Untreated plating sludge without cyanides	701	Inorganic gases
506	Untreated plating sludge with cyanides		<b>Organic Gases</b> — Waste that is primarily organic with low-to-moderate inorganic content and is a gas at atmospheric pressure
507	Other sludge with cyanides	801	Organic gases
508	Sludge with reactive sulfides		<b>— Plant Trash —</b>
509	Sludge with other reactives		<i>(In order to be considered for one of the two plant refuse designations, a waste must first meet the following two criteria.</i>
510	Degreasing sludge with metal scale or filings		<b>First</b> , the waste <b>must</b> be a Class 2 waste. This means that a proper classification determination must be performed for each item which a facility is considering as one of the plant refuse designations. A waste is not a Class 2 solely because it has been designated as a plant refuse waste. <b>Hazardous</b> and <b>Class 1 wastes</b> are <b>not eligible</b> for designation as one of the plant refuses.
511	Air pollution control device sludge (e.g., fly ash, wet scrubber sludge)		<b>Second</b> , the waste must meet the particular definition of the plant refuse term. For more information on these terms, please refer to the terms listed in this table as well as the "Definitions" section which follows this table.)
512	Sediment or lagoon dragout contaminated with organics	902	<b>Supplemental plant production refuse</b> – any Class 2 waste from production, manufacturing, or laboratory operations as long as the total amount of the supplemental plant production refuse does not exceed twenty percent of the total plant trash (form code 999) volume or weight, whichever is less – this could include, but is not limited to, such things as metal parts, floor sweepings, and off-specification materials
513	Sediment or lagoon dragout contaminated with inorganics only	999	<b>Plant Trash</b> – any Class 2 waste originating in the facility offices, laboratory, plant production area or food services/cafeteria operations that is composed of paper, cardboard, linings, wrappings, paper and/or wooden packaging materials, uncontaminated food wastes and/or packaging, cafeteria wastes, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wirings, uncontaminated cloth, metal bindings, empty containers with a holding capacity of less than five gallons, uncontaminated floor sweepings, and personal cosmetics generated by facility personnel (does not include cosmetics generated as a result of manufacturing or plant production operations).
514	Drilling mud		
515	Asbestos slurry or sludge		
516	Chloride or other brine sludge		
519	Other inorganic sludges (Specify in Comments)		
597	Catalyst waste		
598	Nonhazardous sludges containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs		
599	Nonhazardous sludges containing greater than or equal to (>) 500 ppm PCBs		
	<b>Organic Sludges</b> — Waste that is primarily organic with low-to-moderate inorganic solids content and water content, and <b>pumpable</b>		
601	Still bottoms of halogenated (e.g., chlorinated) solvents or other organic liquids		
602	Still bottoms on non-halogenated solvents or other organic liquids		
603	Oily sludge		
604	Organic paint or ink sludge		
605	Reactive or polymerizable organics		
606	Resins, tars, or tarry sludge		
607	Biological treatment sludge		
608	Sewage or other untreated biological sludge		
609	Other organic sludges (Specify in Comments)		
695	Petroleum contaminated sludges other than still bottoms and oily sludges		
696	Grease		
697	Catalyst waste		
698	Nonhazardous sludges containing greater than or equal to (>) 50 ppm and less than (<) 500 ppm PCBs		
699	Nonhazardous sludges containing greater than or equal to (>) 500 ppm PCBs		

## Form Code Definitions

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The following are definitions of terms utilized in form codes:

**Acidic** – A material having a pH less than 7.0.

**Alkaline** – A material having a pH greater than 7.0.

**Aqueous** – A water solution containing organic and/or inorganic constituents dissolved in solution.

**Caustic** – A material which is corrosive or irritating to living tissue and has a pH greater than 7.

**Inorganic** – Chemicals that are not organic (i.e., water, carbon dioxide, carbon disulfide, iron, zinc, steel). Generally, if a waste is composed of more than 50% inorganic materials, it is considered an inorganic waste.

**Organic** – Chemicals composed primarily of carbon and hydrogen and their derivatives. (i.e. methylene chloride, benzene, petroleum products). In general, if a waste is composed of 50% or more organic materials, it is considered an organic waste.

**Plant Trash** – Includes the following Class 2 wastes which are produced as a result of plant production, manufacturing, laboratory, general office, cafeteria or food service operations; paper, cardboard, linings, wrappings, paper or wood packaging materials, food wastes, cafeteria wastes, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wirings, uncontaminated cloth, metal bindings, empty containers with a holding capacity of less than five gallons, uncontaminated floor sweepings, and personal cosmetics generated by facility personnel (does not include cosmetics generated as a result of manufacturing or plant production operations). **Please note that hazardous waste and Class 1 waste can not be designated as “plant office refuse”.** Plant trash shall not include oils, lubricants of any type, oil filters, contaminated soils, sludges, or wastewaters.

Examples of “plant trash” include Class 2 soda cans, lunch sacks, food scraps, envelopes, plastic binders, empty boxes, pallets, styrofoam shipping boxes, chemical container liners, shrink wrap, and broken glassware.

As another example, used typing paper from the secretarial area could be considered “plant trash” because it resulted from general office operations. (Please note that typing paper would normally be considered a

Class 2 waste unless it were contaminated with something to cause it to be considered a hazardous or Class 1 waste. For example, if typing paper were used to clean up a spill of a F003 waste, it would be considered a hazardous waste.)

As another example, a Class 2 off-specification production chemical could not be considered “plant trash” because it does not meet the definition of a “plant trash”. However, the Class 2 off-specification production chemical might be considered a “supplemental plant production refuse” as long as the weight/volume limits established for “supplemental plant production refuse” were not exceeded. (For more information on “supplemental plant production refuse” and weight/volume limits, please see “Supplemental Plant Production Refuse” in these definitions.

**Reactive** – A material is reactive if it is capable of detonation or explosive decomposition:

1. at standard temperature and pressure, or
2. if subjected to a strong ignition source, or
3. heated under confinement.

A material is also considered reactive if, when mixed with water it is:

1. potentially explosive, or
2. reacts violently, or
3. generates toxic gases or vapors (i.e. hydrogencyanide or hydrogensulfide).

A material is also considered reactive if it is:

1. normally unstable and readily undergoes violent changes, or
2. a forbidden explosive (see 49 CFR §173.53), or
3. a Class B explosive (see 49 CFR §173.88).

**Solvent** – A liquid used to dissolve another material.

**Supplemental Plant Production Refuse** – Any **Class 2 Waste from production, manufacturing, or laboratory operations** can be designated as “**supplemental plant production refuse**” (form code 999) as long as the total amount of the supplemental plant production refuse **does not exceed twenty percent of the total plant production refuse volume or weight, whichever is less.**

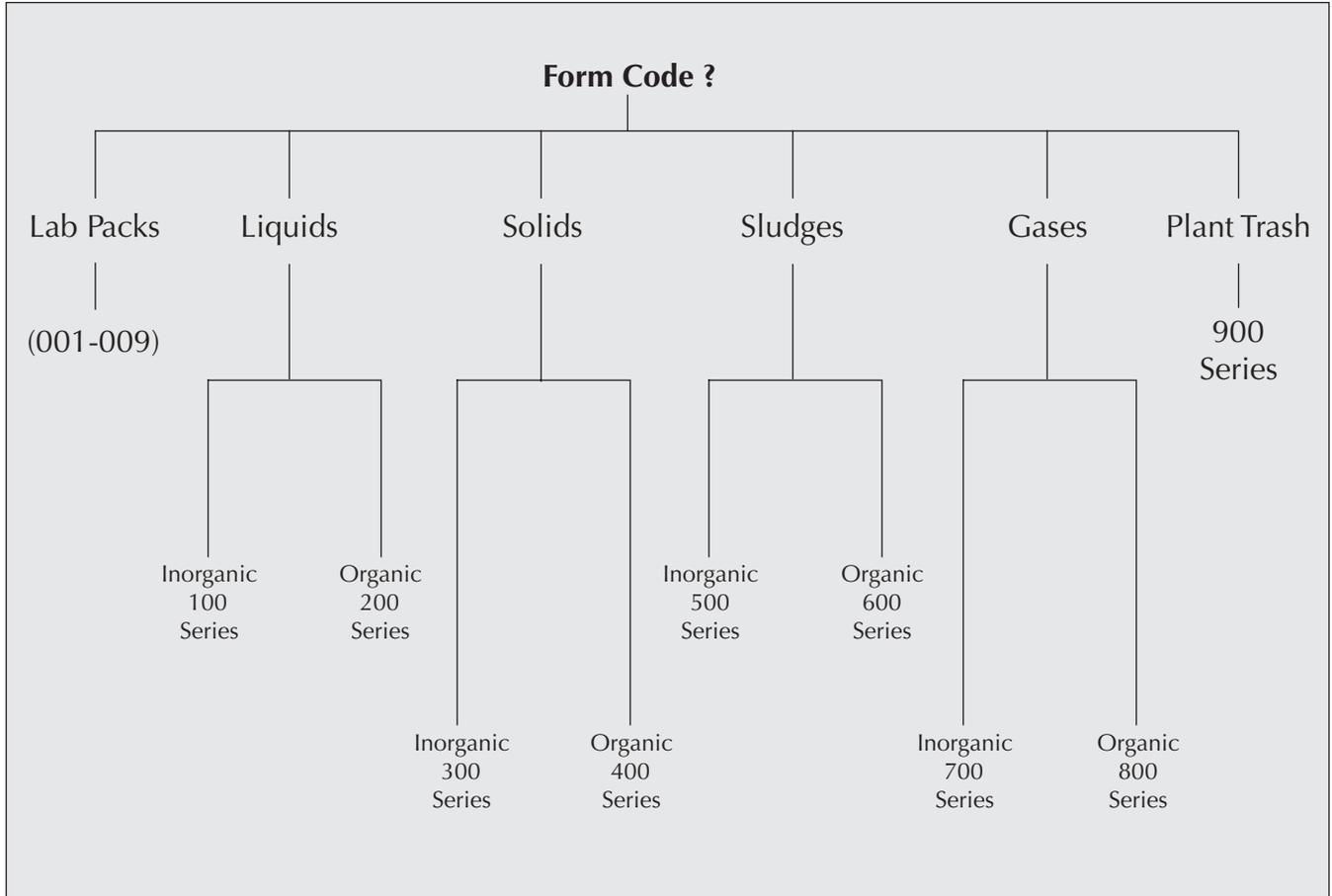
Individual wastes which have been designated “supplemental plant production refuse” may be designated by the generator at a later time as a separate waste in order to maintain the “supplemental plant production refuse” at a level below 20% of the “plant trash” amount. For any waste stream so redesignated, the generator must provide the initial notification information required pursuant to 30 TAC Chapter 335.

## Appendix G – Form Codes

Please note that hazardous waste and Class 1 waste can not be designated as “supplemental plant production refuse”.

Examples of “supplemental plant production refuse” include Class 2 steel shavings, empty metal containers, aerosol cans, old chemicals, safety equipment, and machine parts.

Please note that when a site notifies the Commission that it generates “supplemental plant production refuse”, it must include a list of those wastes which are expected to be included in the “supplemental plant production refuse” designation. If that list increases, the generator must notify the Commission of the additions to that list; otherwise, the Commission will not view the additions as “supplemental plant production refuse”.



### Lab Packs – 001-009 series

Examples:

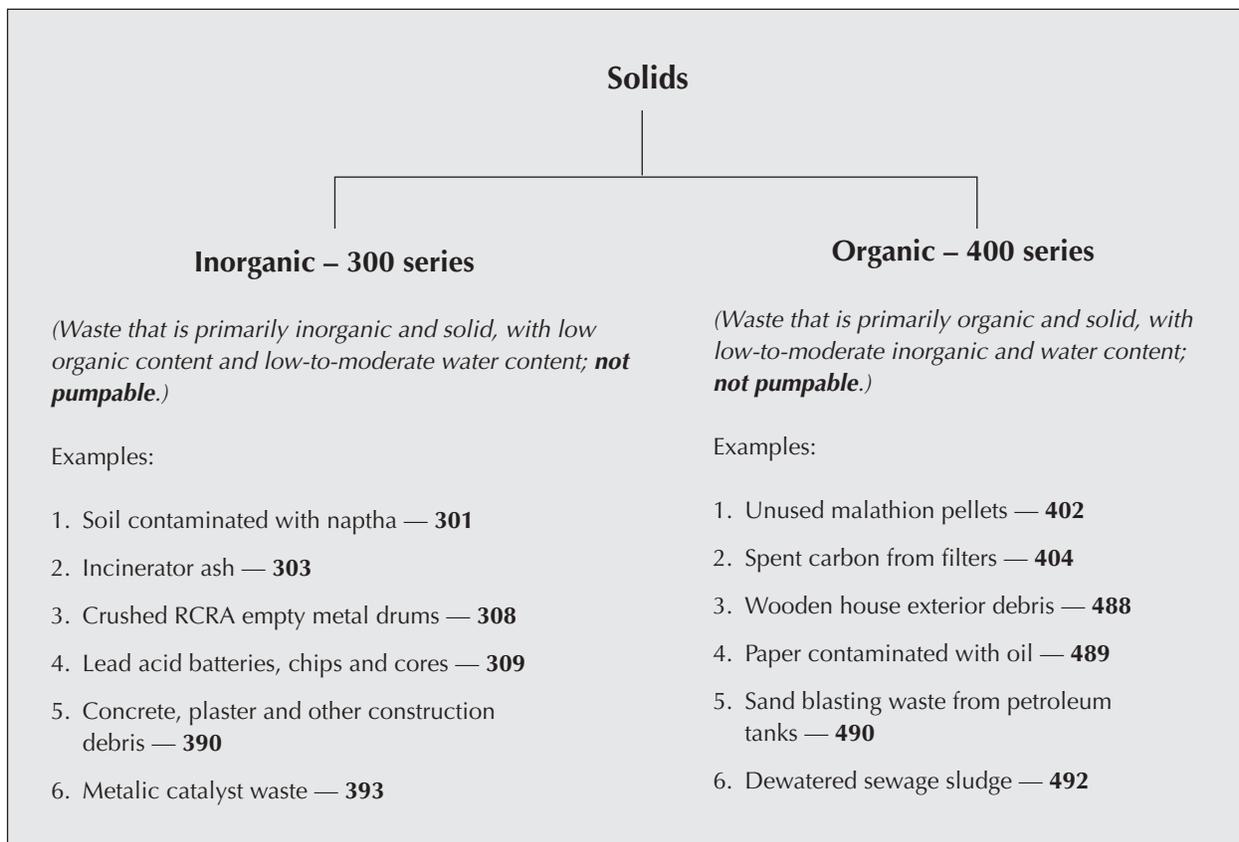
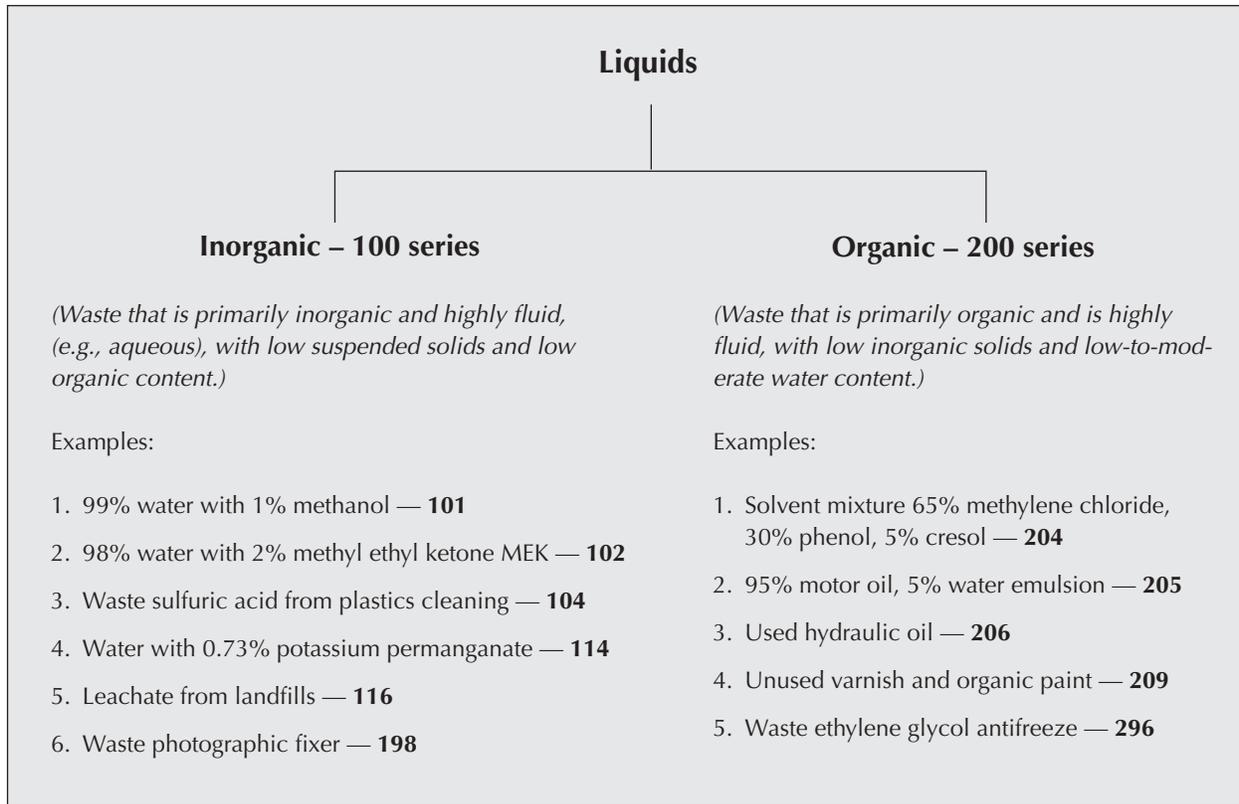
1. Lab pack containing debris — **002**
2. Lab pack containing old unused or partially used chemicals — **001**

### Plant Trash – 900 series

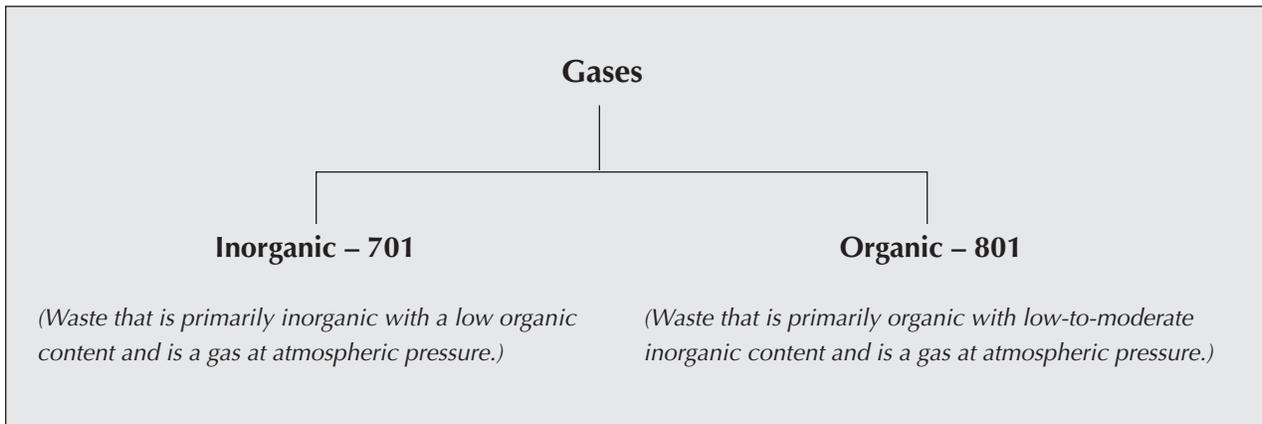
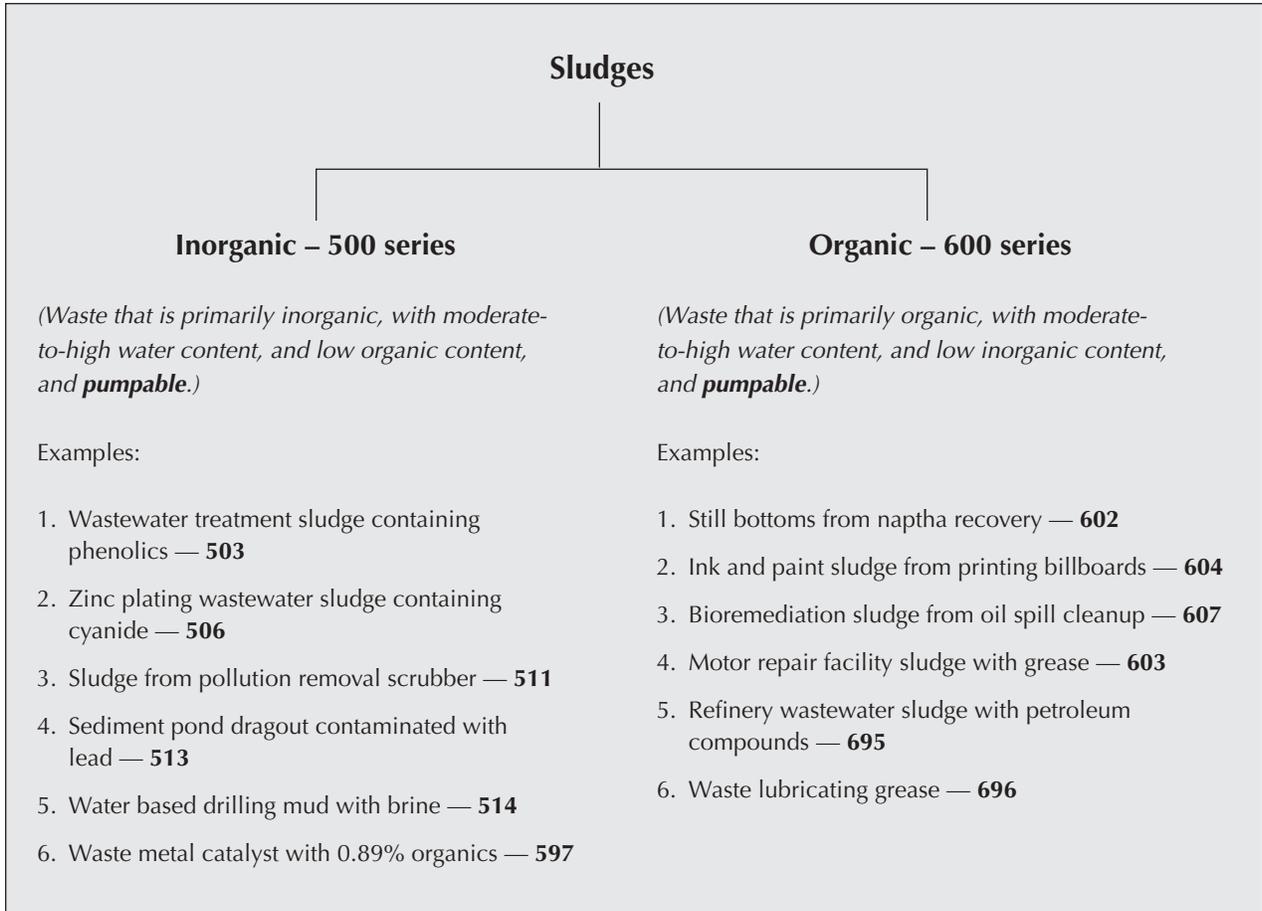
Examples:

1. Office debris (i.e., paper, plastic, aluminum cans and fax paper) — **999**
2. Scrap plastic from molds of toys and souvenirs — **902**
3. Packing debris from unpacking of raw materials — **999**

## Appendix G – Form Codes



Appendix G – Form Codes



# Codes for Out-of-State Waste Generators and Receivers

Codes for States of the United States				Country Codes		
State or Country	Abbreviation	Generator No.	Receiver No.	State or Country	Generator No.	Receiver No.
Alabama	AL	D0001	D0001	American Samoa	D0083	D0083
Alaska	AK	D0002	D0002	Australia	F0095	F0095
Arizona	AZ	D0004	D0004	Austria	F0078	F0078
Arkansas	AR	D0005	D0005	Bahamas Islands	F0002	F0002
California	CA	D0006	D0006	Belgium	F0069	F0069
Colorado	CO	D0008	D0008	Belize	F0091	F0091
Connecticut	CT	D0009	D0009	Brazil	F0086	F0086
Delaware	DE	D0010	D0010	Cambodia	F0001	F0001
Dist. of Columbia		D0011	D0011	Canada	F0063	F0063
Florida	FL	D0012	D0012	Chile	F0007	F0007
Georgia	GA	D0013	D0013	China	F0005	F0005
Hawaii	HI	D0015	D0015	Columbia	F0003	F0003
Idaho	ID	D0016	D0016	Denmark	F0067	F0067
Illinois	IL	D0017	D0017	El Salvador	F0097	F0097
Indiana	IN	D0018	D0018	England	F0064	F0064
Iowa	IA	D0019	D0019	Finland	F0070	F0070
Kansas	KS	D0020	D0020	France	F0076	F0076
Kentucky	KY	D0021	D0021	Germany	F0068	F0068
Louisiana	LA	D0022	D0022	Greece	F0084	F0084
Maine	ME	D0023	D0023	Guam	D0075	D0075
Maryland	MD	D0024	D0024	Haiti	F0093	F0093
Massachusetts	MA	D0025	D0025	Holland	F0079	F0079
Michigan	MI	D0026	D0026	Honduras	F0011	F0011
Minnesota	MN	D0027	D0027	Hong Kong	F0080	F0080
Mississippi	MS	D0028	D0028	India	F0006	F0006
Missouri	MO	D0029	D0029	Italy	F0090	F0090
Montana	MT	D0030	D0030	Jamaica	F0089	F0089
Nebraska	NE	D0031	D0031	Japan	F0062	F0062
Nevada	NV	D0032	D0032	Luxemburg	F0092	F0092
New Hampshire	NH	D0033	D0033	Malaysia	F0077	F0077
New Jersey	NJ	D0034	D0034	Marshall Islands	F0074	F0074
New Mexico	NM	D0035	D0035	Mexico	F0061	F0061
New York	NY	D0036	D0036	Navajo Nation	D0057	D0057
North Carolina	NC	D0037	D0037	Netherlands	F0071	F0071
North Dakota	ND	D0038	D0038	Netherlands Antilles (A,B,C)	F0010	F0010
Ohio	OH	D0039	D0039	Nicaragua	F0094	F0094
Oklahoma	OK	D0040	D0040	Norway	F0081	F0081
Oregon	OR	D0041	D0041	Offshore beyond 12 mi.	F0087	F0087
Pennsylvania	PA	D0042	D0042	Pacific Islands	F0072	F0072
Rhode Island	RI	D0044	D0044	Panama	F0082	F0082
South Carolina	SC	D0045	D0045	Peru	F0085	F0085
South Dakota	SD	D0046	D0046	Puerto Rico	D0060	D0060
Tennessee	TN	D0047	D0047	Saudi Arabia	F0088	F0088
Utah	UT	D0049	D0049	Slovenia	F0009	F0009
Vermont	VT	D0050	D0050	South Africa	F0004	F0004
Virginia	VA	D0051	D0051	Spain	F0065	F0065
Washington	WA	D0053	D0053	Sweden	F0096	F0096
West Virginia	WV	D0054	D0054	Taiwan	F0099	F0099
Wisconsin	WI	D0055	D0055	Thailand	F0008	F0008
Wyoming	WY	D0056	D0056	Trinidad de Tobago	F0098	F0098
				Venezuela	F0073	F0073
				Virgin Islands	D0066	D0066

**RG-029**

**SPECIAL WASTE REGULATIONS IN TEXAS**



# Special Waste Regulations in Texas

Special waste is any solid waste that requires special handling and disposal because of its quantity, concentration, physical or chemical characteristics, or biological properties. Special waste is defined in Title 30 Texas Administrative Code (30 TAC), Chapter 330, 330.3. Special waste that is not specifically identified in 30 TAC 330.171(c) or (d), or 330.173 requires prior written authorization by the TCEQ for disposal. Written authorization for the disposal of a special waste can be obtained in two ways:

1. The generator, with written concurrence from a landfill willing to accept the special waste, may submit a Request for Authorization for Disposal of a Special Waste, agency form TCEQ-0152, along with any supporting documentation, to the Municipal Solid Waste (MSW) Permits Section for review; or
2. the generator may request approval to dispose of a special waste directly from an MSW landfill operator that has an approved Waste Acceptance Plan identified in 330.61(b) that authorizes the acceptance of the specific special waste as set out in 330.171(b)(2).

**Special wastes identified in, and meeting the requirements of, 30 TAC 330.171(c) and (d) do not require prior written authorization before disposal, provided the MSW landfill is permitted to accept these wastes. These include:**

- Municipal hazardous waste from conditionally exempt small-quantity generators may be accepted at a Type I or Type IAE landfill provided the amount of waste does not exceed 220 lb (100 kg) per month per generator.
- Municipal wastewater treatment plant sludges, other types of domestic sewage treatment plant sludges, and water-supply treatment plant sludges.
- Liquid wastes from municipal sources that are treated or processed to eliminate free liquids and tested in accordance with 30 TAC 330.171(c)(7).
- Grease-trap and grit-trap wastes.
- Slaughterhouse wastes.
- Dead animals.
- Empty pesticide (insecticide, herbicide, fungicide, or rodenticide) containers that have been triple rinsed and rendered unusable.

- Certain discarded materials containing asbestos as detailed in 30 TAC 330.171(c)(3) and (4). Regulated asbestos-containing material may be accepted for disposal at a Type I or Type IAE landfill. Nonregulated asbestos-containing materials (non-RACM) may be accepted for disposal at a Type I, Type IAE, Type IV, or Type IVAE landfill. For further information regarding asbestos abatement, contact the Asbestos Programs Branch of the Texas Department of State Health Services Toxic Substance Control Division at 512-834-6600 or 800-572-5548.

**Special wastes that do require prior written authorization include:**

- Untreated medical waste may be approved for disposal by the executive director when necessary to protect human health and the environment from the effects of a natural or man-made disaster.
- Class 1 nonhazardous industrial solid waste not routinely collected with municipal solid waste. (Also see the requirements of 30 TAC 330.173.)
- Wastes from commercial or industrial wastewater treatment plants; air pollution control facilities; and tanks, drums, or containers used for shipping or storing any material that has been listed as a hazardous constituent in 40 CFR, Part 261, Appendix VIII but has not been listed as a commercial chemical product in 40 CFR, 261.33(e) or (f).
- Drugs, contaminated foods, or contaminated beverages, other than those contained in normal household waste.
- Incinerator ash.
- Soil contaminated by petroleum products, crude oil, or chemicals in concentrations of greater than 1,500 milligrams per kilogram total petroleum hydrocarbons; or contaminated by constituents of concern that exceed the concentrations listed in Table 1 of 335.521(a)(1) of this title (relating to Appendices). Such contaminated soil must be disposed of in accordance with 330.171(b)(4).
- Waste from oil, gas, and geothermal activities subject to regulation by the Railroad Commission of Texas when those wastes are to be processed, treated, or disposed of at a municipal solid waste management facility permitted under Chapter 330.
- Waste generated outside the boundaries of Texas that contains:
  - Any industrial waste;
  - Any waste associated with oil, gas, or geothermal exploration, production, or development activities; or
  - Any item listed as a special waste in 30 TAC 330.3.

**The following special wastes are prohibited from disposal in an MSW landfill:**

- Used oil filters from internal combustion engines. Used oil filters are prohibited from disposal at MSW landfills by non-household generators by 30 TAC 330.171(d).
- Lead-acid storage batteries. Lead-acid storage battery disposal is prohibited at MSW landfills by 30 TAC 330.15(e).

**Management and disposal options for special waste:**

1. **Asbestos:** There are two types of asbestos waste—regulated (friable) and non-regulated (not friable) asbestos-containing material (RACM and non-RACM) as defined in 40 CFR Part 61 Section 141. Also, the amount of asbestos in the material contributes to the type of asbestos waste. Non-RACM may become RACM if subject to sanding, grinding, cutting, or abrading, or it has a high probability of being reduced to powder during demolition or renovation.
  - a. RACM is friable asbestos-containing material that contains greater than 1 percent asbestos. Friable is defined as asbestos-containing material that, when dry, can be crushed to a powder by hand pressure. RACM may be disposed of at a Type I or Type I arid exempt (AE) MSW landfill in accordance with 30 TAC 330.171(c)(3).
  - b. Non-RACM is material containing less than one percent asbestos or non-friable asbestos-containing material not identified as regulated. Non-RACM may be disposed of at any MSW landfill provided the facility is authorized to accept the waste in accordance with 30 TAC 330.171(c)(4).
2. **Grease-trap waste:** Material collected in and from a grease interceptor in the sanitary sewer service line of a commercial, institutional, or industrial food service or processing establishment, including the solids resulting from dewatering processes. Grease-trap waste may be from municipal sources and regulated under 30 TAC Chapter 330 or from industrial sources and regulated under 30 TAC Chapter 335. Industrial-waste generators must classify their waste in accordance with Subchapter R of 30 TAC Chapter 335. Grease-trap waste must be transported to an authorized facility which can be a processing or treatment facility, a liquid waste transfer station, or an MSW landfill. Grease-trap waste may also be processed on-site by mobile treatment or processing units. In order for grease-trap waste to be disposed of in an MSW landfill, the waste must pass the paint filter test, Method 9095. Some MSW landfills have liquid-waste solidification units and will process such waste prior to disposal.
3. **Grit-trap waste:** Includes waste from interceptors placed in the drains prior to entering the sewer system at maintenance and repair shops, automobile service stations, car washes, laundries,

and other similar establishments and is regulated under Chapters 330 and 335 in the same manner as grease-trap waste. Grit-trap waste must be transported to an authorized facility which can be a processing or treatment facility, a liquid waste transfer station, or an MSW landfill. Grit-trap waste may also be processed on-site by mobile treatment or processing units. In order for grit-trap waste to be disposed of in an MSW landfill, the waste must pass the paint filter test, Method 9095. Grit-trap waste from car washes may be dried on-site or at a location within 50 miles of generation that is owned by the generator and then disposed of at an authorized facility.

4. **Domestic septage:** Includes liquid and solid material pumped from a septic tank, cesspool, or similar sewage-treatment system and is regulated under 330 in the same manner as grease- and grit-trap waste, but is also subject to Chapter 312 of 30 TAC if used beneficially by land applying. Septage waste must be transported to an authorized facility which can be a wastewater treatment plant, a beneficial land-use site, an MSW processing facility or transfer station, a compost facility, a monofill (sludge only) landfill, or an MSW Type I landfill, or septage may be processed on-site by a mobile unit. Septage waste that is transported to a beneficial land-use site or a monofill must be treated by raising the pH of the waste to 12 for a period of 30 minutes. This treatment is usually performed in the transport unit by adding lime and is the only treatment process allowed for transporters. In addition, septage waste must meet the metal concentration requirements of 30 TAC 312.43 prior to beneficial land application. Like grease- and grit-trap waste, septage waste must pass the paint filter test prior to disposal in an MSW landfill or monofill.
5. **Liquid waste transporter requirements:** All transporters of liquid waste—including grease-trap, grit-trap, and septage waste—must be registered with the TCEQ. Transporters are required to manifest shipments of liquid waste in the form of a trip ticket that identifies the generator, the transporter, and the disposal facility. The transporter is required to provide the generator with the first copy of the trip ticket; after delivery, the transporter must provide the generator the completed fourth copy, which verifies that the disposal facility received the shipment of liquid waste. Transporter companies are required to maintain records of all shipments of liquid waste for five years.
6. **Liquid waste generator requirements:** Generators are responsible for the proper treatment and disposal of their waste. Generators must contract with a TCEQ-registered liquid-waste transporter and must receive a copy of the signed trip ticket from the transporter. The generator must also receive a second signed copy of the trip ticket with the treatment or disposal facility signature and information and must maintain trip-ticket records for three years. Industrial liquid-waste generators are responsible for properly

classifying their waste under Subchapter R of 30 TAC Chapter 335.

7. The following wastes pose a greater potential for objectionable odor. These wastes should be managed and transported to contain odor and then covered immediately at an MSW landfill:
  - a. liquid waste
  - b. grease-trap and grit-trap waste
  - c. slaughterhouse waste
  - d. dead animals
  - e. sludges resulting from wastewater (and possibly water) treatment
8. Wastes which may cause a windblown particulate nuisance condition should be covered immediately at an MSW landfill.

For additional information or questions regarding the disposal of special waste, please contact the Municipal Solid Waste Permits Section of the TCEQ at 512-239-2334 or e-mail inquiries to <mswpermits@tceq.state.tx.us>.

**RG-486**

**DISPOSAL OF EXEMPT WASTE THAT CONTAINS RADIOACTIVE MATERIAL**



RG-486  
November 2010

# Disposal of Exempt Waste That Contains Radioactive Material

Radioactive Materials Division

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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



# **DISPOSAL OF EXEMPT WASTE THAT CONTAINS RADIOACTIVE MATERIAL**

Prepared by  
Radioactive Materials Division

RG-486  
November 2010



**Bryan W. Shaw, Ph.D.,** *Chairman*  
**Buddy Garcia,** *Commissioner*  
**Carlos Rubinstein,** *Commissioner*

**Mark R. Vickery, P.G.,** *Executive Director*

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Published and distributed  
by the  
Texas Commission on Environmental Quality  
PO Box 13087  
Austin TX 78711-3087

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# ABBREVIATIONS AND SYMBOLS

## Abbreviations

CFR	Code of Federal Regulations
DL	detection limit
dpm	disintegrations per minute
DSHS	(Texas) Department of State Health Services
DOT	(U.S.) Department of Transportation
LLD	lower limit of detection
MDA	minimum detectable activity
MSW	municipal solid waste
NELAC	National Environmental Laboratory Accreditation Conference
NORM	naturally occurring radioactive material
NRC	(U.S.) Nuclear Regulatory Commission
RRC	Railroad Commission of Texas
SI	International System of units, from the French <i>Le Système Internationale d'Unites</i>
SS&D	sealed source and device
TAC	Texas Administrative Code 30 TAC <i>xx</i> = "Title 30, Texas Administrative Code, Chapter (Section, etc.) <i>xx</i> "
TCEQ	Texas Commission on Environmental Quality
THSC	Texas Health and Safety Code

## Symbols

%	percent
4E-2	$4 \times 10^{-2}$ (actual number shown as an example)

Bq	becquerel (1 disintegration per second)
Ci	curie ( $3.7 \times 10^{10}$ disintegrations per second)
cm	centimeter
GBq	gigabecquerel (1 million disintegrations per second)
J	joule (unit of energy)
kBq	kilobecquerel (1,000 disintegrations per second)
m <sup>2</sup>	square meter
mg/cm <sup>2</sup>	milligram per square centimeter
pCi/g	picocurie per gram (0.037 disintegrations per second per gram)
rad	The special unit of absorbed dose equal to an absorbed dose of 0.01 J/kg.
rem	Unit of dose equivalent equal to the absorbed dose in rad multiplied by the quality factor (1 rem = 0.01 sievert).
s	second
Si	sievert: SI unit of dose equivalent equal to the absorbed dose in J/kg (grays) multiplied by the quality factor
T	tritium (Hydrogen-3)
yd <sup>3</sup>	cubic yard





# 1 INTRODUCTION

This guide explains and clarifies the instances where radioactive materials can be exempted from the standard disposal requirements for radioactive wastes. If radioactive materials meet the criteria detailed in this guide, the TCEQ may issue an exemption for the materials. If a radioactive material is exempted, it can be disposed of as if it was not a radioactive material—e.g., if the material would be municipal solid waste if it were not radioactive, then it can be disposed of in an authorized municipal solid waste disposal facility when it receives an exemption. Radioactive waste is exempt from regulations when it poses a reasonably low risk to public health and safety and the environment. *Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials* (NRC, 2001) contains the calculations and methodology used to assess the potential radiation doses associated with the exemption regulations for the normal life cycle, which includes final disposal.

Despite its radioactive content, exempt materials do not need to be sent to a facility that is licensed for radioactive waste disposal [25 TAC 289.101(o)].<sup>1</sup> The disposal of exempt material **as a radioactive substance** is not subject to further regulation by the TCEQ, though the material will still be regulated for other non-radioactive constituents. If it does not meet the exemption criteria, then it must be disposed of in the manner stipulated in 30 TAC 336.211, as appropriate to the type of licensed material.

Before accepting exempt materials, a disposal facility may require a letter from the TCEQ stating that the waste meets the exemption criteria found in the regulations and is thereby exempt from other regulations concerning radioactive-waste disposal. This statement from the TCEQ is called an *exemption concurrence*. Some hazardous-waste disposal facilities regulated by the TCEQ have a condition in their permit requiring them to obtain an exemption concurrence before disposing of exempt materials.

This guide focuses on the disposal of exempt material in TCEQ-regulated disposal facilities: the agencies in Texas that have authority over exempt materials, what materials are exempt, the TCEQ regulations over exempt materials, and what documentation and analysis are required to determine whether the material meets the TCEQ's exemption requirements. Several terms are defined in Appendix A, tables containing exemption-activity values from the regulations are reproduced in Appendix B, and a primer on radiation appears in Appendix C.

---

<sup>1</sup> Short for 'Title 25, Texas Administrative Code, Subsection 289.101(o).'

This guide summarizes the TCEQ rules and regulations concerning exempt materials to assist waste generators and disposal facilities. The rules in the Texas Administrative Code should always be reviewed. The rules will form the ultimate basis for granting an exemption concurrence. If any wording of this guide conflicts with the code, then the code takes precedence.

## 2 REGULATORY BASIS

### 2.1 State Agencies that Regulate Radioactive Material

Three state agencies regulate the handling, processing, transporting, transferring, receiving, storage, and disposal of radioactive material in Texas: the TCEQ, the Texas Department of State Health Services (DSHS), and the Railroad Commission of Texas (RRC).

#### The Department of State Health Services

(<[www.dshs.state.tx.us/radiation/](http://www.dshs.state.tx.us/radiation/)> regulates and licenses the possession, receipt, use, handling, transfer, transport, and storage of all radioactive material except for the radioactive material specifically regulated under the authority of the RRC and the TCEQ. Additionally, the DSHS registers radiation-producing equipment and operates the radiological emergency-response program for Texas. The radiation rules of the DSHS appear at 25 TAC 289. All exemption concurrences for waste that was generated under a DSHS radioactive-material license must be obtained from the DSHS.

#### The Railroad Commission of Texas

<[www.rrc.state.tx.us/environmental/publications/norm.php](http://www.rrc.state.tx.us/environmental/publications/norm.php)> has authority over uranium exploration, surface mining, and handling and disposal of naturally occurring radioactive-material (NORM) wastes produced during the exploration and production of oil and gas. The radiation rules of the RRC can be found at 16 TAC 4 for NORM and 16 TAC 11 for uranium mining. Any exemption concurrences for NORM waste at oil- and gas-production sites must be obtained from the RRC.

#### The Texas Commission on Environmental Quality

<[www.tceq.state.tx.us/nav/permits/rw.html](http://www.tceq.state.tx.us/nav/permits/rw.html)> regulates and licenses the following:

- Receipt, processing, storage and disposal of by-product and low-level radioactive waste from other “persons,” which is defined as to include organizations such as companies or institutions.
- Uranium- and thorium-recovery facilities and the disposal of uranium and thorium by-product wastes.
- Decommissioning of inactive uranium-recovery facilities and sites for the disposal of radioactive material.

The TCEQ radiation rules can be found at 30 TAC 336. Exemption concurrences for waste generated in Texas that was not generated under the authority of the DSHS or the RRC must be obtained from the TCEQ. Exemption

concurrences for waste generated outside of Texas, but to be disposed of in Texas, also must be obtained from the TCEQ.

## 2.2 TCEQ Regulations Concerning Exemptions

The use and disposal of radioactive materials in Texas is governed by Texas Health and Safety Code Chapter 401. The authorization and rules concerning exempt materials appear at THSC 401.106(a). Specific regulations concerning the criteria that materials containing radioactivity must meet to qualify for an exemption are described below, and are mostly found at 25 TAC 289.251 and 289.259. These exemption regulations are based on federal regulations promulgated by the NRC which require that agreement states have essentially identical language in their state rules.

Exemptions are promulgated by the TCEQ under 30 TAC 336.5. Most exemption concurrences are granted under 30 TAC 336.5(c), which exempts waste from licensing requirements under THSC 401.106(a), thus authorizing the TCEQ to use the exemption rules from the DSHS, such as 25 TAC 289.251(d), 251(e), and 259(d). *See* 25 TAC 289.101(c)(2) and (o).

Senate Bill 1604 of the 80th regular legislative session transferred the authority over processing and storage of uranium, by-product, and radioactive waste from the DSHS to the TCEQ, effective June 15, 2007. That bill also transferred the responsibility to grant exemption concurrences from the DSHS to the TCEQ. SB 1604 is reflected in 30 TAC 336.5(d), which exempts any material exempted from licensing requirements for disposal by the DSHS before June 18, 2007.

## 2.3 Additional Regulatory Considerations

### 2.3.1 NRC Alternate Disposal Authorizations

The NRC has an additional option for exempting radioactive material under Title 10, Code of Federal Regulations (10 CFR) 20.2002, which states are not required to adopt into their own regulations. This federal rule is not in the Texas code and cannot exempt a waste for disposal in Texas.

### 2.3.2 Dilution Not Allowed to Change Waste Class

Texas does not allow dilution for reduction of the radioactive concentration so that the waste classification is lowered or disposal requirements lessened [30 TAC 336.229]. The TCEQ will not grant an exemption concurrence to any

waste that was diluted so that it would meet the criteria. Waste that has been diluted due to stabilization, mixing, or treatment will be subject to the disposal regulations according to its pre-dilution concentration.

### ***2.3.3 Department of Transportation Exempt Material***

The U.S. Department of Transportation also has a category called *exempt radioactive material*. However, the DOT exemption rules regulate only how such material is to be transported, not how it is to be used or disposed of. DOT policy differs from the NRC exempt-material rules, and consequently the Texas rules. Therefore, this category only applies to issues related to transportation.

### ***2.3.4 Use of Standard International Units***

Additionally, whenever exemption limits are stated using both the units *curie* and *becquerel* in the regulations, the becquerel values are to be used. In such cases, the becquerel value is the legal limit, while the curie value is also stated in the rule since the curie is most widely used in the United States. The curie value is only an approximation of the becquerel unit due to rounding.

### **3 EXEMPTION RULES FOR RADIOACTIVE-MATERIAL LICENSEES ONLY**

A radioactive-material licensee may dispose of the following licensed material exhibiting radioactivity as though it were exempt material. These exemptions apply only to licensees for the waste generated under authority of their radioactive-material license. Disposal of these materials is typically performed as one of several licensed activities (approved by the appropriate regulating agency in the license application and amendment reviews) and verified by inspections from the appropriate regulatory agency—not through an exemption concurrence. Occasionally, though, disposing of this material as exempt does require an exemption concurrence.

A licensee cannot exceed specific contamination limits for soil, facilities, or equipment in 25 TAC 289.202(eee) and 30 TAC 336.356. Contamination that exceeds those limits must be remediated and will not be considered exempt if left in place for unrestricted use. However, if removed for disposal, the contaminated soil, building rubble, or equipment may be considered exempt for disposal only. This rule applies to both specific licensees and general licensees. (General licenses are under the authority of the DSHS; the rules concerning them appear at 25 TAC 289.251.) However, the exemption rules discussed in this section may not apply to a general licensee and additional clarification should be obtained in such situations by contacting the appropriate regulatory agency.

#### **3.1 Release into Sanitary Sewerage: 30 TAC 336.215**

A licensee may discharge licensed material below specified activity levels into a sewer system (“sanitary sewerage”) if the material is either readily soluble in water or is readily dispersible biological material. The quantity released into the sewer in one month divided by the average monthly volume of water released into the sewer cannot exceed the concentration values listed in Table III of 30 TAC 336.359 (values in this table can be found in Table B.1 in Appendix B). The sum-of-fractions rule (see Appendix A for definition) applies if more than one radionuclide is released.

The total activity released in one year may not exceed:

- 5 Ci (185 GBq) of hydrogen-3 (tritium),
- 1 Ci (37 GBq) of carbon-14, and
- 1 Ci (37 GBq) of all other radioactive materials combined.

### **3.2 Disposal of Hydrogen-3, Carbon-14, and Iodine-125 in Specific Media: 30 TAC 336.225(a) and (b), with qualifying rules at (e) and (f)**

A licensee may dispose of the following licensed material as if it were not radioactive but not in a manner that would permit its use either as food for humans or as animal feed:

- 0.05  $\mu\text{Ci}$  (1.85 kBq), or less, of hydrogen-3, carbon-14, or iodine-125 per gram of medium used for liquid scintillation counting or in vitro clinical or in vitro laboratory testing.
- animal tissue containing 0.05  $\mu\text{Ci}$  (1.85 kBq), or less, of hydrogen-3, carbon-14, or iodine-125 per gram, averaged over the weight of the entire animal.

To qualify for this disposal exemption, the licensee must:

- perform surveys adequate to assure that the specified limits are not exceeded [336.225(e)(1)];
- remove or otherwise obliterate or obscure all labels, tags, or other markings which would indicate that the material or contents are radioactive [336.225(e)(2)]; and
- maintain records in accordance with 30 TAC 336.338 [336.225(f)].

### **3.3 The 300-Day Rule: 30 TAC 336.225(c)**

A licensee may, if approved by the appropriate licensing authority (either the DSHS or the TCEQ), dispose of licensed material listed in 30 TAC 336.365 (and also in Table B.2 in Appendix B) in a Type I municipal solid-waste facility (as defined in TCEQ rules, 30 TAC 330) under the following provisions. The sum-of-fractions rule applies if more than one radionuclide is present. The rule is referred to as the “300-day” rule since the isotopes identified in 30 TAC 336.365 have a half-life under 300 days. The licensed material:

- cannot be hazardous waste, nor combined with hazardous waste, as defined at 30 TAC 330
- must not exceed the specified concentration and annual activity limits in 30 TAC 336.365, Appendix H (see Table B.2)
- must comply with all other requirements for disposals at a Type I municipal solid waste facility and any other requirements for those facilities as set forth in 30 TAC 330

If the material is hazardous waste or is combined with hazardous waste, then it must be disposed of at a hazardous waste disposal facility in accordance with TCEQ rules at 30 TAC 335. The licensee must:

- perform surveys adequate to assure that the specified limits are not exceeded [336.225(e)(1)]
- remove or otherwise obliterate or obscure all labels, tags, or other markings which would indicate that the material or contents are radioactive [336.225(e)(2)]
- maintain records in accordance with 30 TAC 336.338 [336.225(f)]
- submit a copy of the following procedures to TCEQ (or DSHS if it is a DSHS licensee) [336.225(d)]:
  - physical delivery of the material to the disposal facility
  - compliance surveys to be performed
  - maintaining secure packaging during transportation to the site
  - maintaining records of any disposals made under 30 TAC 336.225(d)

### **3.4 Decay in Storage: 30 TAC 336.211(a)(3)**

Decay in storage is authorized in the regulations “according to law.” This authorization is mainly used by medical institutions, licensed by DSHS, for short-lived radionuclides—with half-lives below 120 days—used in nuclear medicine, such as metastable technetium-99, xenon-133, and fluorine-18.

### **3.5 Release of Sites for Unrestricted Use: 30 TAC 336.603 and 336.356**

If a site has been released for unrestricted use (also known as *clean release*), then it has been released from regulatory authority for radioactive material. The soil that remains in place at this site released for unrestricted use does not need an exemption concurrence to be considered exempt. However, if contaminated soil has been removed from the site before the declaration of release for unrestricted use, the soil may not be exempt, and an exemption-concurrence request would need to demonstrate that the soil meets the exemption criteria stipulated in the regulations.

A site meets the unrestricted-use requirement if the residual radioactivity distinguishable from background radiation results in a total effective-dose equivalent of 25 mrem (0.25 mSv) per year or less to an average member of the critical group [30 TAC 336.603]. Additional activity requirements are stated in 30 TAC 336.356(a) for radium. The activity of radium-226 or radium-228 in soil, based on dry weight and averaged over any 100 square meters of area, is not to exceed 5 pCi/g averaged over the first 15 centimeters of soil below the surface and 15 pCi/g averaged over each 15 cm-thick layer of soil below the first 15 centimeters beneath the surface. Also, radium-226 or

radium-228 activities in vegetation are not to exceed 5 pCi/g, based on dry weight.

All remediation and cleanup activities need the approval of the appropriate regulatory agency, which has the authority to determine if a site meets the requirements of unrestricted use.

### 3.6 Release for Unrestricted Use of Surface Contaminated Objects: 30 TAC 336.605

The release for unrestricted use of facilities, equipment, or materials with surface contamination is allowed if the radioactive surface contamination levels are below the limits specified in 30 TAC 336.364, Appendix G, which are replicated in Table 1 below. If it has been released for unrestricted use (through procedures approved by the regulatory license reviewers and inspectors), then it has been released from regulatory authority for radioactive material and does not need an exemption concurrence to be exempt.

Table 1. Acceptable Surface Contamination Levels from 30 TAC 336.364

Radionuclide	Average	Maximum	Removable
U-natural, U-235, U-238, and associated decay products except Ra-226, Th-230, Ac-227, and Pa-231	5,000 dpm alpha/100 cm <sup>2</sup>	15,000 dpm alpha/100 cm <sup>2</sup>	1,000 dpm alpha/100 cm <sup>2</sup>
Transuranics, Ra-223, Ra-224, Ra-226, Ra-228, Th-natural, Th-228, Th-230, Th-232, U-232, Pa-231, Ac-227, Sr-90, I-125, I-126, I-129, I-131, and I-133	1,000 dpm/100 cm <sup>2</sup>	3,000 dpm/100 cm <sup>2</sup>	200 dpm/100 cm <sup>2</sup>
Beta-gamma emitters (radionuclides with decay modes other than alpha emission or spontaneous fission) except Sr-90 and others noted above	5,000 dpm beta-gamma/100 cm <sup>2</sup>	15,000 dpm beta-gamma/100 cm <sup>2</sup>	1,000 dpm beta-gamma/100 cm <sup>2</sup>

Porous materials (e.g., concrete), before being released for unrestricted use, must be evaluated to determine whether radioactive contamination has penetrated to the interior of the material. If so, an average concentration, in picocuries per gram, must be determined by the facility, subject to TCEQ review. This interior contaminated porous material may be exempt if the radionuclide concentrations do not exceed the exemption limits specified in the regulations.

## 4 NATURALLY OCCURRING RADIOACTIVE MATERIAL

### 4.1 Definitions

NORM is any substance that naturally contains one or more radionuclides. Under 25 TAC 289.259(c)(4), NORM is naturally occurring material not regulated under the Atomic Energy Act which has had its radionuclide concentrations increased by, or as a result of, human practices. NORM does not include the natural radioactivity of rocks or soils, or background radiation, but instead refers to material which has had its radioactivity concentrated by controllable practices (or by past human practices).

The DSHS and the TCEQ have slightly different definitions of NORM in their rules. The DSHS definition is used for exemption concurrences, since the exemption rules are mostly contained in the DSHS regulations. The TCEQ definition can be found at 30 TAC 336.2(83): a solid, liquid, or gaseous material or combination of materials, excluding source material, special nuclear material, and by-product material, that

- in its natural physical state spontaneously emits radiation,
- is discarded or unwanted, and
- is not exempt under rules of the DSHS adopted pursuant to THSC 401.106.

Natural radioactivity is defined in 25 TAC 289.201(b)(63) as radioactivity of naturally occurring nuclides whose location and chemical and physical form have not been altered by humans.

### 4.2 Sources of Naturally Occurring Radioactivity

Naturally occurring radioactivity can be divided into two categories: *cosmogenic* and *primordial*. Cosmogenic radioactivity consists of radionuclides formed by interaction of cosmic rays with atoms in the atmosphere, which include carbon-14 (with a half-life of 5,715 years), tritium or hydrogen-3 (12.32 years), sodium-22 (2.6 years), and beryllium-7 (53 days).

Primordial radioactivity consists of radionuclides with half-lives over hundreds of millions of years that were present at the formation of the Earth, which include potassium-40, rubidium-87, uranium, and thorium. Uranium and thorium (the *parent* nuclides) decay into shorter-lived radionuclides

(*daughter* nuclides) such as radium and radon. Since the half-life of the parent is much larger than the half-lives of the daughters, the activity of each daughter approaches the activity of the parent after a time period approximately equal to five times the daughter's half-life. This is called secular equilibrium and results in an increase of the total activity of the material beyond the activity of the uranium or thorium alone. The three main decay chains of uranium and thorium, along with the daughters formed, are listed in the order in which they are formed in Table 2.

Since parent and daughter nuclides are different elements and thus have different chemical properties, they are often separated when the material containing them is processed. For example, NORM waste from the oil-and-gas industry either has radium as its main radionuclide of concern (from process water, scale, and sludge at exploration sites) or contains mainly lead-210 and its decay daughters, bismuth-210 and polonium-210 (typically found inside gas-processing equipment). Radium and lead were combined under the ground before being pumped up and processed.

Table 2. Uranium-238, Uranium-235, and Thorium-232 natural radioactivity decay chains

Radioisotope	Half-life <sup>a</sup>	Radioisotope	Half-life <sup>a</sup>	Radioisotope	Half-life <sup>a</sup>
uranium-238	4.5 By	uranium-235	0.7 By	thorium-232	14 By
thorium-234	21.4 d	thorium-231	25.6 y	radium-228	6.7 y
protactinium-234 (metastable)	1.2 m	protactinium-231	34,300 y	actinium-228	6.1 h
uranium-234	245,500 y	actinium-227	21.8 y	thorium-228	1.9 y
thorium-230	77,000 y	thorium-227	18.4 d	radium-224	3.6 d
radium-226	1,600 y	francium-223	21 m	radon-220	55 s
radon-222	93.8 d	radium-223	11.7 d	polonium-216	0.15 s
polonium-218	3.1 m	radon-219	3.9 s	lead-212	10.6 h
lead-214	26.8 m	polonium-215	0.002 s	bismuth-212	60.6 m
bismuth-214	19.7 m	lead-211	36.1 m	thallium-208	3.0 m
polonium-214	0.0002 s	bismuth-211	2.16 m	lead-208	stable
lead-210	22.3 y	polonium-211	0.5 s		
bismuth-210	5 d	thallium-207	4.78 m		
polonium-210	138.4 d	lead-207	stable		
lead-206	stable				

<sup>a</sup> By = billion years, y = years, d = days, h = hours, m = minutes, s = seconds

### 4.3 Small Quantities of Radium or NORM in Soil or Other Media: 25 TAC 289.259(d)

NORM waste is exempt for purposes of disposal under 25 TAC 289.259(d) if it contains, or is contaminated at, the following concentrations in soil or other media:

- 30 picocuries per gram (pCi/g) or less of radium-226 or radium-228 provided the radon emanation rate is less than 20 picocuries per square meter per second (pCi/m<sup>2</sup>/sec),
- 5 pCi/g or less of radium-226 or radium-228 in which the radon emanation rate is equal to or greater than 20 pCi/m<sup>2</sup>/sec; or
- 150 pCi/g or less of any other NORM radionuclide.

Radium-226 and radium-228 are considered separately, so both isotopes can be up to the limit (30 or 5 pCi/g) and still be exempt. Typically, Ra-226 is present in larger quantities than Ra-228. *Other media* is defined in 25 TAC 289.259(c)(5) as “any volumetric material other than soils or liquids (for example: sludge, scale, slag, etcetera [sic]).”

Note that the radon-220 emanation rate, formed by the decay of radium-228-contaminated material, would likely be undetectable due to the extremely short half-life of radon-220. The radon-emanation rate specified in the rule above does not apply to:

- known NORM types for which the radon-emanation fraction has been documented to be low, e.g. oil-production scales and sludges;
- soil in which the known volume of NORM would be too low to produce a radon-emanation rate of 20 pCi/m<sup>2</sup>/s (as demonstrated by calculation); or
- soil that has been displaced from its natural location and is to be disposed of in a (permitted) disposal site for hazardous material.

This 30 pCi/g rule [289.259(d)] is not applicable to pipe or other equipment as a means of determining exemption. It is more appropriate for volumetric media, such as sludge, slag, soil, scale, or rubble mixed with other media.

This rule is not to be confused with the “release for unrestricted use” rules at 30 TAC 336.356 (see section 3.5); 25 TAC 289.259(d) applies to soil that has been removed from the site before the site was declared to be released for unrestricted use. These rules are not to be used for determining if soil or other media can be released for unrestricted use.

## 4.4 Source Material: 25 TAC 289.251(d)(1) and (2)

### 4.4.1 Weight Percent of 0.05

For the purpose of exemption concurrences, source material is defined as uranium or thorium, or any combination thereof, in any physical or chemical form [30 TAC 336.2(125)]. Source material does not include special nuclear material (defined in Appendix A). Any chemical mixture, compound, solution, or alloy of source material is exempt if the source material is by weight less 0.05% of the mixture, compound, solution, or alloy [25 TAC 251(d)(1)].

The levels of activity per unit mass that corresponds to 0.05% by weight for different source material radionuclides are shown in Table 3. In the calculations of weight percent, the isotopes Th-228, Th-230, and U-234 can be ignored, since their activity values at 0.05 weight percent exceed the limit of U-238 or Th-232 by over three orders of magnitude and these isotopes, being in equilibrium with Th-232 and U-238, will have activities equal to or less than their parents'. Additionally, U-235 can usually be ignored for uranium that has not been enriched, since it is present in natural ore at only 0.72% by mass, and 2.2% by activity, compared to total uranium.

If radium and other daughters are at or reaching secular equilibrium with the uranium or thorium (each daughter activity should then be equal to or less than the parent activity), then the activity of the daughter is not considered for determining the exemption status of the material. The daughter radionuclides are considered to be covered under the exemption of the uranium or thorium parent. For example, if the material contains 100 pCi/g uranium-238 (under 0.05% by weight) and 90 pCi/g radium-226, it is still exempt even though the radium exceeds 30 pCi/g (see Section 4.1).

Table 3. Specific-Activity Values for 0.05 Weight Percent of Source Material

Isotope	Specific Activity	Material	Specific activity
thorium-232	54.9 pCi/g	natural thorium	110 pCi/g of total Thorium <sup>a</sup>
uranium-238	167.5 pCi/g	natural uranium	340 pCi/g of total Uranium <sup>b</sup>
uranium-235	1,078 pCi/g	depleted uranium	199 pCi/g of total Uranium <sup>c</sup>

<sup>a</sup> Th-232 is in secular equilibrium with its daughter Th-228 (both isotopes are at equal activity level).

<sup>b</sup> By activity, 48.8% U-234 (daughter of U-238), 2.4% U-235, and 48.8% U-238 (IAEA, 2010).

<sup>c</sup> Typically, by activity, 15.2% U-234, 1.1% U-235, and 83.7% U-238 (IAEA, 2010).

### 4.4.2 Unrefined or Unprocessed Ore

Unrefined and unprocessed ore containing source material are exempt provided that the ore has not been refined or processed [25 TAC

289.251(d)(2)]. This exemption does not apply to the mining of ore containing source material for the extraction of source material (known as *source recovery*), which requires a specific license from the TCEQ or the RRC.

#### **4.4.3 Rare-Earth Elements with Source Material**

Rare-earth metals and compounds, mixtures, and products containing no more than 0.25% by weight of thorium, uranium, or any combination of these are exempt [25 TAC 289.251(d)(A)(vi)]. Rare-earth metals include the elements scandium, yttrium, and the 15 lanthanides (also referred to as lanthanoids) with atomic numbers 57–71: lanthanum, cerium, praseodymium, neodymium, promethium, samarium, europium, gadolinium, terbium, dysprosium, holmium, erbium, thulium, ytterbium, and lutetium.

### **4.5 Specific Items Containing Source Material: 25 TAC 289.251(d)(3)**

#### **4.5.1 Thorium**

The following specific items containing thorium are exempt, provided that they meet the weight percentage and other requirements found in the rule.

- incandescent gas mantles: any quantity of Th [25 TAC 251(d)(3)(A)(i)]
- vacuum tubes: any quantity of Th [25 TAC 251(d)(3)(A)(ii)]
- welding rods: any quantity of Th [25 TAC 251(d)(3)(A)(iii)]
- electric lamps used for illuminating: no more than 50 mg Th per lamp [25 TAC 251(d)(3)(A)(iv)]
- germicidal lamps, sunlamps, and lamps for outdoor or industrial lighting: no more than 2 g Th per lamp [25 TAC 251(d)(3)(A)(v)]
- personnel neutron dosimeters: no more than 50 mg Th per dosimeter [25 TAC 251(d)(3)(A)(vi)]
- finished optical lenses (except for contact lenses, spectacles, or in eyepieces in binoculars or in other optical instruments): no more than 30% by weight of Th (does not include the shaping, grinding, or polishing of such lenses or manufacturing processes other than the assembly of such lenses into optical systems and devices without any alteration of the lens) [25 TAC 251(d)(3)(G)]
- finished aircraft-engine parts containing nickel-thoria alloy [25 TAC 251(d)(3)(I)], provided that:

- the thorium is dispersed in the nickel-thoria alloy in the form of finely divided thoria (thorium dioxide) and
- the thorium content in the nickel-thoria alloy does not exceed 4.0% by weight
- any finished product or part containing metal-thorium alloys [25 TAC 289.259(d)(3)(D)], provided that:
  - the thorium content of the alloy does not exceed 4% by weight

The chemical, physical, or metallurgical treatment or processing of these products or parts is not authorized under this rule. However, if parts are machined to ensure they still meet tolerance levels after a period of use, the shavings will be considered exempt for waste-disposal purposes

### **4.5.2 Uranium**

Uranium contained in detector heads for use in fire-detection units are exempt, provided that each detector head contains not more than 0.005 microcuries of uranium [25 TAC 251(d)(3)(H)].

### **4.5.3 Source Material**

The following items containing source material are exempt provided that they meet the weight percentages and other requirements in the rule.

- glazed ceramics (for example tableware): the glaze may not contain more than 20% source material by weight [25 TAC 251(d)(3)(B)(i)]
- glassware (except commercially manufactured glass brick, pane glass, ceramic tile, or other glass or ceramic used in construction): no more than 10% source material by weight [25 TAC 251(d)(3)(B)(ii)]
- glass enamel or glass-enamel frit imported or ordered for importation into the U.S., or initially distributed by manufacturers in the U.S., before July 25, 1983: no more than 10% source material by weight [25 TAC 251(d)(3)(B)(iii)]
- piezoelectric ceramic: no more than 2.0% source material by weight [25 TAC 251(d)(3)(B)(iv)]
- photographic film, negatives, and prints [25 TAC 251(d)(3)(C)]: no weight-percent limit

## **4.6 Depleted Uranium**

Additionally, depleted uranium is exempt if it is used as shielding constituting part of any shipping container, provided that the shipping container is

conspicuously and legibly impressed with the legend "CAUTION—RADIOACTIVE SHIELDING—URANIUM;" and the uranium metal is encased in mild steel or an equally fire-resistant material, with a wall thickness of at least  $\frac{1}{8}$  inch [25 TAC 289.251(d)(3)(F)].

Depleted uranium is exempt if it is contained in counterweights installed (also if stored or handled in connection with the installation or removal of such counterweights) in aircraft, rockets, projectiles, and missiles [25 TAC 289.251(d)(3)(E)]. The rule does not authorize the chemical, physical, or metallurgical treatment or processing of any of these counterweights except for the purpose of repairing or restoring any plating, covering, or labeling. This exemption applies provided that:

- the counterweights are manufactured in accordance with a specific license issued by the NRC authorizing distribution by the licensee in accordance with 10 CFR 40;
- each counterweight has been impressed with the following legend clearly legible through any plating or other covering: "DEPLETED URANIUM" ("CAUTION—RADIOACTIVE MATERIAL—URANIUM" if manufactured prior to December 31, 1969); and
- each counterweight is durably and legibly labeled or marked with the identification of the manufacturer and the statement: "UNAUTHORIZED ALTERATIONS PROHIBITED" ("CAUTION—RADIOACTIVE MATERIAL—URANIUM" if manufactured prior to December 31, 1969).

## 4.7 Other Exempt NORM Items

### 4.7.1 Recycled Contaminated Objects

Materials and equipment in the recycling process contaminated with NORM scale or residue are exempt if the maximum radiation exposure level, including the background radiation level, does not exceed 50 microroentgens per hour ( $\mu\text{R/hr}$ ) at any accessible point [25 TAC 289.259(d)(2)]. Recycling is defined in this context as "a process by which materials that have served their useful purpose are collected, separated, or processed and returned to use in the form of raw materials in the production of new products" [25 TAC 289.259(c)(8)]. Recycling does not include the reuse of an oil pipe after cleaning.

### 4.7.2 Oil and Gas Products and Processing

Pipe (tubulars) and other downhole or surface equipment used in oil production contaminated with NORM scale or residue are exempt if the

maximum radiation exposure level, including the background radiation level, does not exceed 50  $\mu\text{R/hr}$  at any accessible point [25 TAC 289.259(d)(3)]. Unlike other exemption rules that apply to both gas and oil, this rule applies only to oil production.

Natural gas, natural-gas products, crude oil, and crude-oil products containing NORM are exempt [25 TAC 289.259(d)(7)]. However, the processing and manufacturing of natural-gas and crude-oil products containing NORM are subject to general license requirements. Possession of produced waters from crude oil and natural gas production is exempt if the produced waters are reinjected into a well approved by the agency having jurisdiction or if the produced waters are discharged under the authority of the appropriate agency [25 TAC 289.259(d)(8)].

If the waste is under the authority of the Railroad Commission, contact the RRC for the application of this rule to exempt material. Oil-production waste generated outside of Texas falls under the authority of TCEQ if disposed of in Texas.

### ***4.7.3 Phosphate Industry***

The wholesale and retail commercial distribution (including custom blending), possession, and use of the following products and materials, or the recycling of equipment or containers used to produce, contain, or transport them, are exempt [25 TAC 289.259(d)(6)]:

- Phosphate and potash fertilizer. (Note that the manufacture of phosphate and potash fertilizer is subject to general license requirements.)
- Phosphogypsum for agricultural uses, if such commercial distribution and uses meet the requirements of 40 CFR 61.204.

### ***4.7.4 Building, Construction, Industrial Processing, and Other NORM***

Materials used for building construction are exempt if the materials contain NORM that has not been concentrated to higher levels than those found in their natural state. This exemption includes the wholesale and retail commercial distribution, possession, use, and recycling of equipment or containers used to produce, contain, or transport these materials [25 TAC 289.259(d)(6)].

Material used for building construction, industrial processing, sand blasting, metal casings, or other NORM in which the radionuclide content has not been concentrated to higher levels than found in its natural state is exempt. This exemption includes any products or materials and the recycling of equipment

or containers used to produce, contain, or transport those products or materials [25 TAC 289.259(d)(5)].

The following materials commonly contain NORM at relatively high concentrations (but have not been concentrated to higher levels than those found in their natural state and are therefore exempt) and are frequently seen in exemption requests:

- Refractory bricks: NORM is not concentrated during use in a furnace and is therefore exempt under 25 TAC 289.259(d)(5)(C).
- Zirconium oxide (zircon, zirconium): commonly used as a blasting agent. It has a typical total activity of 130 to 145 pCi/g but contains a higher activity of radium (greater than 30 pCi/g) than uranium and thorium. It is exempt under 25 TAC 259(d)(5)(C) as a NORM material used in industrial processing in which radionuclide content has not been concentrated to higher levels than found in its natural state.
- Monazite sand containing thorium-232 and its daughters.
- Alumina, used for ceramic insulators in electrical equipment.

#### ***4.7.5 Potassium and By-Products from Fossil-Fuel Combustion***

The following products and materials and the recycling of equipment or containers used to produce, contain, or transport them, are exempt [25 TAC 289.259(d)(5)]:

- potassium and potassium compounds that have not been isotopically enriched in the radionuclide K-40
- byproducts from fossil-fuel combustion (bottom ash, fly ash, and by-products of flue-gas emission control)

## 5 NON-NORM EXEMPTIONS

### 5.1 Exempt Concentrations of Radionuclides

Rule 25 TAC 289.251(e)(1) exempts materials (solid, liquid, or gaseous) containing radioactive material other than source material which have radionuclide concentrations that do not exceed those listed in 25 TAC §289.251(l)(1), which can be found in Tables B.3 and B.4 in Appendix B.

If a radionuclide decays to a radioactive daughter, the value in those tables for the parent radionuclide includes the daughter activity. The activity of the daughter, as long as it is not greater than the activity of the parent, is not considered in the determination of whether the material is exempt. The sum-of-fractions rule applies if more than one radionuclide is present.

Please note that in most disposal situations, waste form restrictions (such as moisture being below a certain percentage) at landfills and disposal facilities would rule out the disposal of liquid and gaseous wastes, even though values are given for liquid and gaseous concentrations in 25 TAC 289.251(l)(1). These exemption rules were written for use, as well as disposal, of those materials.

This exemption only applies to waste in which radioactive or by-product<sup>2</sup> material was introduced into the waste in accordance to a specific or general license (a specific license **only** for by-product material) of the NRC, an agreement state, or a licensing state.

### 5.2 Exempt Quantities of Radionuclides

Rule 25 TAC 289.251(e)(2) grants exemptions for materials (solid, liquid, or gaseous) containing radioactive material, other than source material, which have individual quantities of radionuclides that do not exceed those listed in 25 TAC 289.251(l)(2), reproduced in Table B.5 in Appendix B. The sum-of-fractions rule applies if more than one radionuclide is present.

Examples of individual quantities for which this rule applies include, but are not limited to, sealed sources and, for liquid waste, the container—such as a tank, truck, or train car—in which the waste is transported into the facility. If the radionuclide is listed in both 25 TAC 289.251(l)(1) and (2), then the concentration limit in 25 TAC 289.251(l)(1) is to be used.

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<sup>2</sup> See Appendix A for definition.

This exemption only applies to waste into which radioactive material has been introduced in accordance with a specific or general license of the NRC, an agreement state, or a licensing state. Additionally, waste in which the radionuclide activity has decayed from quantities not originally exempt does not qualify for this exemption.

Note that in most disposal situations, restrictions on the form of waste (such as moisture being below a certain percentage) of landfills and disposal facilities would rule out the disposal of liquid and gaseous waste even though values are given for liquid and gaseous concentrations in 25 TAC 289.251(l)(1). Those exemption rules were written for use, as well as disposal, of such materials.

### 5.3 Specific Items: 25 TAC 289.251(e)(3)

The following items, which incorporate radioactivity for functional purposes, are exempt if they meet the activity and radiation exposure levels in the rule:

- Timepieces, hands, or dials [25 TAC 289.251(e)(3)(A)(i)(I)] containing not more than—
  - tritium (Hydrogen-3): 25 mCi per timepiece, 5 mCi per hand, 15 mCi per dial (bezels when used shall be considered as part of the dial);
  - radium-226: 1  $\mu$ Ci per timepiece in intact timepieces manufactured prior to January 1, 1986; or
  - promethium-147:
    - 100  $\mu$ Ci per watch or 200  $\mu$ Ci per any other timepiece, 20  $\mu$ Ci per watch hand or 40  $\mu$ Ci per other timepiece hand, 60  $\mu$ Ci per watch dial or 120  $\mu$ Ci per other timepiece dial (bezels when used shall be considered as part of the dial), and
    - The radiation exposure at 10 centimeters when measured through 50 milligrams per square centimeter ( $\text{mg}/\text{cm}^2$ ) of absorber from any surface shall not exceed
      - 0.1 mrad/hr for wristwatches,
      - 0.1 mrad/hr for pocket watches, and
      - 0.2 mrad/hr for any other timepiece.
- Lock illuminators installed in automobile locks containing not more than [25 TAC 289.251(e)(3)(A)(i)(II)]—
  - tritium: 15 mCi or
  - promethium-147:
    - 2 mCi and

- an exposure rate not exceeding 1 mrad/hr at 1 cm from any surface when measured through 50 mg/cm<sup>2</sup> of absorber.
- Precision balances containing not more than 1 mCi of tritium per balance or not more than 0.5 mCi of tritium per balance part [25 TAC 289.251(e)(3)(A)(i)(III)].
- Automobile shift quadrants containing not more than 25 mCi of tritium [25 TAC 289.251(e)(3)(A)(i)(IV)].
- Marine compasses containing not more than 750 mCi of tritium gas and other marine navigational instruments containing not more than 250 mCi of tritium gas [25 TAC 289.251(e)(3)(A)(i)(V)].
- Thermostat dials and pointers containing not more than 25 mCi of tritium per thermostat [25 TAC 289.251(e)(3)(A)(i)(VI)].
- Electron tubes (including spark-gap tubes, power tubes, gas tubes, glow lamps, receiving tubes, microwave tubes, indicator tubes, pick-up tubes, radiation detection tubes, and any other completely sealed tube designed to control electrical currents) [25 TAC 289.251(e)(3)(A)(i)(VII)] provided that—
  - each tube does not contain more than one of the following specified quantities of radioactive material:
    - Tritium: 150 mCi per microwave receiver protector tube or 10 mCi per any other electron tube,
    - Cobalt-60: 1 μCi,
    - Nickel-63: 5 μCi,
    - Krypton-85: 30 μCi,
    - Cesium-137: 5 μCi, or
    - Promethium-147: 30 μCi, and
  - for each tube, the exposure level does not exceed 1 mrad/hr at 1 cm from any surface when measured through 7 mg/cm<sup>2</sup> of absorber.
- Instruments for measuring ionizing radiation containing, for purposes of internal calibration or standardization, a source of radioactive material not exceeding either the applicable quantity set forth in 25 TAC 289.251(l)(2) [see Table B.5] or 0.05 μCi of americium-241 [25 TAC 289.251(e)(3)(A)(i)(VIII)].
- Spark-gap irradiators, each containing no more than 1 μCi of cobalt-60, for use in electrically ignited fuel-oil burners having a firing rate of at least 3 gallons per hour [25 TAC 289.251(e)(3)(A)(i)(IX)].
- Capsules containing 1 μCi or less of carbon-14 urea for *in vivo* diagnostic use in humans [25 TAC 289.251(e)(4)]. (A specific license is required to manufacture, prepare, process, produce, package, repackage, or transfer for commercial distribution such capsules.)

- Self-luminous products containing tritium, krypton-85, or promethium-147 if manufactured, processed, produced, imported, or transferred in accordance with a specific license issued by the NRC authorizing the transfer of the product to persons exempt from regulatory requirements except for [25 TAC 289.251(e)(3)(B)(i)]:
  - those who manufacture, process, or produce these products,
  - products in which self-luminosity serves frivolous purposes, or
  - toys or adornments.
- Ionization-chamber smoke detectors containing no more than 1  $\mu\text{Ci}$  of Am-241 per detector in the form of a foil and designed to protect life and property from fire [25 TAC 289.251(e)(3)(A)(i)(X)].
- Items that contain less than 0.1  $\mu\text{Ci}$  of radium-226 if received, possessed, used, transferred, or owned prior to January 1, 1986 [25 TAC 289.251(e)(3)(B)(ii)].
- Gas and aerosol detectors containing radioactive material designed to protect life or property from fires and airborne hazards are exempt (except for persons who manufacture, process, produce, or initially transfer these detectors) provided that the detectors were manufactured, imported, or transferred in accordance with a specific license issued by the NRC, an agreement state or a licensing state which authorizes the initial transfer of the detectors to persons who are exempt from regulatory requirements [25 TAC 289.251(e)(3)(C)].
  - Detectors must be intact to qualify for this exemption. That is, the cover must not have been removed, nor the source removed from the unit.
  - Required documentation to qualify for this exemption is typically either a sealed-source-and-device (SS&D) sheet or a copy of the radioactive-material license that identifies the make and model of the smoke detector as exempt. The SS&D sheet can be obtained from the manufacturer. If it is unobtainable, the state regulator (Chapter 7 has contact information) has access to additional resources not available to the public that may be able to identify the detector's make and model as exempt. If documentation cannot be found, then that item cannot be exempted under this rule.

## **5.4 Emission-control dust from electric arc furnaces: 25 TAC 289.202(ff)(2)**

This exemption requires approval from either the TCEQ or the DSHS. The DSHS is the appropriate agency if the generator of the material was a DSHS licensee. The TCEQ is the appropriate agency in all other instances.

Emission-control dust and other material from electric-arc furnaces or foundries contaminated as a result of inadvertent melting of cesium-137 or americium-241 sources may be transferred for disposal to a hazardous-waste disposal facility authorized by the TCEQ without regard to its radioactivity if all of the following conditions are met [25 TAC 289.202(ff)(2)]. (“Licensee” includes the owner-operator of an electric arc furnace or foundry or the service contractor hired to handle the waste.)

- The emission-control dust and other incident-related materials (“contaminated materials”), whether packaged or unpackaged (i.e., bulk), must be treated through stabilization to comply with all waste-treatment requirements by the licensee, who must be licensed to possess, treat, or transfer incident-related material contaminated with Cs-137 or Am-241, .
- Transfer and storage (if applicable) and storage of the contaminated materials were in accordance with operating and emergency procedures approved by the appropriate regulatory agency.
- The total Cs-137 or Am-241 activity contained in the contaminated materials to be transferred for disposal was specifically approved by the NRC or all appropriate agreement states and does not exceed the total activity associated with the inadvertent melting incident.
- The operator of the hazardous-waste disposal facility has been notified in writing of the impending transfer and has agreed in writing to receive and dispose of the materials. (Copies of the notification and agreement must be submitted to the appropriate regulatory agency.)
- The licensee has notified the NRC or all agreement states in which the transferor and transferee are located, in writing, of the impending transfer, at least 30 days before the transfer.
- The stabilized contaminated materials had been packaged for transportation and disposal in non-bulk steel packaging as defined in DOT regulations at 49 CFR 173.213.
- The pretreatment average concentrations of Cs-137 in the stabilized contaminated materials do not exceed 130 pCi/g for packaged contaminated materials and 100 pCi/g for unpackaged contaminated materials.
- The pretreatment average concentrations of Am-241 in the stabilized materials do not exceed 3 pCi/g for packaged and unpackaged contaminated materials.
- The dose rate at 3.28 feet (1 meter) from the surface of any package containing the stabilized waste does not exceed 20  $\mu$ rem/hr above background.
- The licensee transferring the contaminated materials must consult with the NRC, the appropriate state and federal agencies, and local governments and obtain all necessary approvals.

- The total incident-related activity received by a disposal facility over its operating life shall not exceed 1 Ci of Cs-137 and 30 mCi of Am-241.

## 6 ALTERNATIVE METHOD FOR OBTAINING AN EXEMPTION CONCURRENCE

Another option for obtaining an exemption concurrence is stipulated at 30 TAC 336.5(a): the TCEQ may exempt a radioactive material if it determines that the exemption is not prohibited by law and will not result in a significant risk to public health and safety or the environment. Persons requesting an exemption under this rule need to submit an application to TCEQ using the process in 30 TAC 90 (relating to regulatory flexibility).

The application must be accompanied by certain fees and must include:

- the nature of the request,
- a legal analysis to demonstrate that the exemption is not prohibited by law,
- a technical analysis to demonstrate that the exemption will not result in a significant risk to public health and safety or the environment, and
- a detailed explanation, including a demonstration as appropriate, that the proposed exemption is:
  - not prohibited by law, including any requirement for a federally approved or authorized program, and
  - at least as protective of the environment and the public health as the method or standard prescribed by the TCEQ rule that would otherwise apply.

## 7 OBTAINING AN EXEMPTION CONCURRENCE

To request an exemption concurrence, send a signed letter with the appropriate documentation to the Radioactive Materials Division, MC 233, TCEQ, P.O. Box 13087, Austin TX 78711-3087. Please mark on the envelope that an exemption is being requested. The request can also be scanned and electronically submitted to the Radioactive Materials Division. However, if the request is over 50 pages, a hard copy must be mailed as well. To determine the point of contact for exemptions, call the Radioactive Materials Division at 512-239-6466.

Often, a hazardous-waste disposal facility will request an exemption concurrence for the waste generator as part of its process of receiving and disposing of waste that contains radioactive material.

Please include the following information in the exemption-concurrence request:

- the waste-generator identification
- the volume of waste
- the physical form of the waste
- a sampling protocol and sampling data
- characterization
- the device manufacturer's name and device model number (if appropriate)
- any other information that may help in making the exemption determination

The TCEQ typically needs up to two weeks to review an exemption request. If the agency requires additional information, its staff will contact the requester by letter, e-mail, or phone. There is no fee for an exemption-concurrence request (or for the actual concurrence) unless the exemption is processed according to 30 TAC 336.5(a) (see Chapter 6).

An exemption concurrence can only be granted to a material or item if documentation shows that it meets the exemption criteria. Documentation can be one or more of the following: process knowledge, radiochemical analysis of the sample, radiation surveys of the item or material, or NRC analysis documenting that it meets the exemption criteria, provided that the criteria are also in the Texas Administrative Code.

## 7.1 Process Knowledge

Many items identified in the exemption rules have been manufactured with specific radioactive content so that those items would satisfy the exemption limits. Such items can be exempted without radiochemical analysis if it can be documented that they were manufactured to contain a radioactive content at or below the exemption limits. Some examples of such items or documentation include:

- a smoke detector which has a sticker attached verifying that it contains 1  $\mu\text{Ci}$  or less of americium-241
- a sealed-source-or-device sheet from the NRC exempting this specific sealed source, identified by manufacturer and model number
- NRC license showing the make and model of a device or sealed source as being authorized to be commercially distributed as an exempt item
- company literature
- a Material Data Safety Sheet
- items used by the U.S. armed forces that are built according to military specifications and listed by a national part number in the Technical Bulletin (Army, 1998) as exempt.

The list above is not an exhaustive discussion of the different possibilities for using process knowledge but only gives examples from prior exemption-concurrence requests.

Clearly defined manufacturing processes that use NORM material can be exempted using process knowledge [under 25 TAC 289.259(d)(5)(A), (5)(C), and (6)(C)] if it can be documented that the process does not concentrate the naturally occurring radionuclides according to the appropriate regulation.

## 7.2 Radiochemical Analysis

If process knowledge cannot demonstrate whether an item or material is exempt, then the TCEQ may require sampling to ascertain whether the waste meets the exemption criteria.

### ***7.2.1 NELAC Accreditation***

Analytical data from samples measured by a laboratory can only be accepted if the laboratory is National Environmental Laboratory Accreditation Conference (NELAC) accredited by the Texas Laboratory Accreditation Program operated

by the TCEQ<sup>3</sup> or the data are exempt from the NELAC-accreditation requirement under one of the following criteria [30 TAC 25.6]:

- The laboratory is an on-site or in-house environmental testing laboratory that
  - is inspected at least every three years by the executive director,
  - is located in another state and accredited or periodically inspected by that state, or
  - gets inspected at least every three years by the executive director and is performing work:
    - for another company with a unit located on the same site, or
    - without compensation for a governmental agency or a charitable organization.
- The lab is accredited under federal law, including certification by the United States Environmental Protection Agency to provide analytical data for decisions relating to compliance with the Safe Drinking Water Act.
- The lab supplies analytical data necessary for emergency response and the required analytical data are not otherwise available from an environmental testing laboratory that is accredited by the TCEQ or federal law.
- The lab supplies analytical data for which the commission does not offer accreditation.

## **7.2.2 Minimum Detectable Activity and Detection Limit**

The *minimum detectable activity* (MDA) is the smallest activity above the background level of a radionuclide that will be detected with a 95% probability (a 5% probability of a *false negative*) and a 5% probability of falsely concluding that a sample at background is above the background activity value (*false positive*). The MDA is the minimum radionuclide activity that an instrument can reliably detect.

The *detection limit* (DL) is the smallest activity that will be detected with a 5% false positive probability but with a false negative probability higher than 5%. The DL is also known as the *lower level of detection*. If the analytical result is above the DL, even if the value is below the MDA, it can be concluded that the radionuclide is present above background in that sample. The DL is the minimum activity that an instrument can detect.

It is a common error to assume that measurements below the MDA indicate that the sample does not contain that radionuclide or that the radionuclide is at background levels. Reported values below the MDA should be reported as

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<sup>3</sup> A list of which laboratories are accredited by the TCEQ appears at <[www.tceq.state.tx.us/assets/public/compliance/compliance\\_support/qa/txnelap\\_lab\\_list.pdf](http://www.tceq.state.tx.us/assets/public/compliance/compliance_support/qa/txnelap_lab_list.pdf)>.

measured, even if negative, and not be listed only as being below the MDA. Since values above the DL indicate the presence of the radionuclide, the MDA should not be used as the detection cutoff point.

The MDA and DL depends upon the type of instrument, the counting geometry (position and size of the radiation source in relation to the detector), the measurement methodology, and the radionuclide to be detected. The DL must be below the exemption limits or the values cannot be used to confirm that the exemption requirements have been met.

Equations 1 and 2 determine the MDA and LLD, respectively. The square root of the background activity is also the standard deviation of the background count.

$$\text{Eqn. 1} \quad LLD = 2.33\sqrt{B}$$

$$\text{Eqn. 2} \quad MDA = 3 + 4.66\sqrt{B}$$

$B$  is the measured background activity.

### 7.2.3 Averaging and Homogeneity

It is important that the sample accurately represent the average activity level of the waste volume. If homogeneity cannot be guaranteed, then four to five samples are required for every 20 cubic yards (yd<sup>3</sup>). The maximum volume of material over which averaging may be performed is 20 yd<sup>3</sup>. No single measurement made to calculate an average volumetric or surface-activity contamination can exceed 10 times the exemption criteria.

A total of fewer than four to five samples per 20 yd<sup>3</sup> will be accepted if additional data are included such as the studies of contaminated soil from an environmental remediation project which had been sampled extensively during the characterization or remediation stage. Examples of acceptable data successfully used in prior exemption-concurrence requests, combined with analytical laboratory analysis of samples, include the results of an *in situ* object-counting system (ISOCS) and screening surveys of soil or debris with the intent of on-site segregation into waste types.

Each waste container is considered as a separate waste volume. Two waste volumes cannot be averaged together to determine if the activity is below the exemption limit. For example, two containers, one at 34 pCi/g Ra-226 and the other at 20 pCi/g Ra-226 cannot be averaged to yield a result of 27 pCi/g Ra-226 and thereby exempt both containers. Only the container at 20 pCi/g Ra-226 would be exempt.

## 7.2.4 Measurement of Daughters to Determine Parent Radionuclide Activity

Some radiochemical analyses are difficult to perform, given the isotope and the material. These analyses may require alternative testing methodologies. For example, analysis of thorium in metal is a difficult measurement to perform since iron in the sample interferes with measuring the thorium. However, the daughters of the parent nuclide (uranium or thorium) may be measured to determine the parent radionuclide concentration. In addition, whether equilibrium has been reached (daughter activity equals parent activity) or the ratio of daughter activity to parent activity (if equilibrium has not yet been reached) can be calculated from the elapsed time since the item was processed or manufactured and the half-life values of the applicable isotopes.

## 7.2.5 Surface Contaminated Waste

Volumetric measurements of surface-contaminated waste (averaging the activity on the surface over the mass of the piece of debris)—such as fixed contamination on concrete rubble—for disposal exemption concurrences are allowed, case by case, if the procedures in ANSI/HPS N13.12-1999 are closely followed. Contaminated distinct items or equipment, if they are to be disposed of, do not need to meet the surface-contamination release limits in 30 TAC 336.364 (see Table 1). The TCEQ will not accept a calculation that averages the activity on the surface of a piece of debris and the entire mass of material in a container containing non-contaminated rubble or other waste. *Radiological Assessments for Clearance of Materials from Nuclear Facilities* (NRC, 2003: section 3.8) contains a methodology relating specific activities (Bq/cm<sup>2</sup>) to specific areal activity (Bq/g), including the mass-to-surface-ratio conversion factors for various steel components of nuclear power plants.

## 7.3 Radiation Survey

Radiation surveys (wipes or exposure rates) are sometimes required to determine if exemption requirements are met. Rules regarding the radiation-survey instruments are at 25 TAC 289.259(e), which is summarized below.

- The radiation-survey instrument must be:
  - able to measure from 1  $\mu\text{R/hr}$  to at least 500  $\mu\text{R/hr}$ ,
  - calibrated,
  - appropriate (for example, a detector able to measure alpha radiation shall be used for alpha-emitting radionuclides), and
  - operable.
- Calibration of the radiation-survey instrument must:

- be performed by a person licensed or registered by the DSHS, another agreement state or licensing state, or the NRC to perform such service;
  - be for the same energy values as the radiation to be measured;
  - be performed annually and also after each time that the instrument is serviced (changing the battery does not require that the instrument be calibrated); and
  - demonstrate an accuracy within  $\pm 20\%$  using a reference source supplied by a person properly authorized.
- Records of instrument calibrations are to be maintained for inspection by the NRC, DSHS, or an appropriate agreement-state agency for five years after the calibration date.

## 7.4 NRC Analysis

A letter from the NRC documenting its analysis and conclusion that a specific waste volume or stream meets the exemption requirements may be accepted by TCEQ to grant an exemption concurrence in Texas, provided that the rule in the Code of Federal Regulations used by the NRC to exempt the material is also in the Texas Administrative Code (see Subsection 2.3.1).

## 8 REFERENCES

- American National Standards Institute–Health Physics Society. 1999. *Surface and Volume Radioactivity Standards for Clearance*. ANSI/HPS N13.12-1999. McLean, VA: Health Physics Society.
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- International Atomic Energy Association. 2010. *Feature: Depleted Uranium, Questions and Answers*. Vienna. Available online at: [www.iaea.org/NewsCenter/Features/DU/du\\_qaa.shtml](http://www.iaea.org/NewsCenter/Features/DU/du_qaa.shtml).
- NRC. 1974. *Termination of Operating Licenses for Nuclear Reactors*. Regulatory Guide 1.86. Washington.
- . 2001. *Systematic Radiological Assessment of Exemptions for Source and Byproduct Materials*. NUREG-1717. Washington.
- . 2003. *Radiological Assessments for Clearance of Materials from Nuclear Facilities*. NUREG-1640. Washington.

## APPENDIX A: DEFINITIONS

**agreement state.** Any state with which the NRC has entered into an effective agreement under 274b of the Atomic Energy Act of 1954, as amended. An agreement state regulates radioactive material within its boundaries except for federal sites and nuclear power plants.

**by-product material.** Defined in 30 TAC 336.2(16) in regards to source material as “the tailings or wastes produced by or resulting from the extraction or concentration of uranium or thorium from ore processed primarily for its source material content, including discrete surface wastes resulting from uranium solution extraction processes, and other tailings having similar radiological characteristics.” It excludes underground ore bodies depleted by these solution-extraction processes.

**executive director.** The executive director of the commission, or any authorized individual designated to act for the executive director [30 TAC 3.2(16)].

**exempt material.** Radioactive material that is exempt from the radioactive-material regulations and can therefore be used or disposed of without consideration of its radioactive content.

**exemption concurrence.** A letter from the appropriate regulatory agency stating that a specific radioactive material or object meets the exemption criteria stipulated in the Texas Administrative Code and is therefore exempt from the radioactive material regulations.

**false negative.** Failure of an analysis of a sample for a radionuclide contaminant to detect that radionuclide when the sample actually is contaminated with it.

**false positive.** Seeming detection of a radionuclide contaminant in a sample when the sample actually is not contaminated with that radionuclide.

**licensed material.** Radioactive material received, possessed, used, or transferred under a general or specific license issued by the agency [25 TAC 289.201(b)(53)].

**naturally occurring radioactive material.** Defined in 25 TAC 289.259(c)(4) as:

Naturally occurring materials not regulated under the A[tomic] E[nergy] A[ct] whose radionuclide concentrations have been increased by or as a result of human practices. NORM does not include the natural radioactivity of rocks or soils, or background radiation, but instead refers to materials whose radioactivity is

concentrated by controllable practices (or by past human practices). NORM does not include source, byproduct, or special nuclear material.

**special nuclear material.** Either (A) plutonium, uranium-233, uranium enriched in the isotope 233 or in the isotope 235, and any other material that NRC, in accordance with the provisions of the Atomic Energy Act of 1954, 51 as amended, determines to be special nuclear material, but does not include source material; or (B) any material artificially enriched by any of the foregoing, but not source material [25 TAC 289.201(b)(101)].

**sum-of-fractions rule.** Equation used to determine if a mixture of radionuclides exceeds a regulatory limit when each radionuclide has a different activity limit. The rule is shown in Equation A-1, but can be described as the requirement that the sum of the ratios of the radionuclide concentrations over its regulatory limit is less than or equal to one.

Eqn. A-1 
$$Ratio = \sum_{i=1}^N \frac{C_i}{R_i} \leq 1.0$$

$C$  is the measured concentration or activity of radioisotope  $i$ .

$R$  is the regulatory limit for the concentration or activity of radioisotope  $i$ .

$N$  is the total number of radioisotopes in the waste.

**transuranics (TRUs).** Elements with an atomic number higher than that of uranium, which is 92. Common transuranic elements are neptunium, plutonium, americium, and curium.

**tritium.** A hydrogen isotope with one proton and two neutrons. It is commonly referred as tritium (T) instead of hydrogen-3 (H-3).

# APPENDIX B: REGULATORY TABLES USED TO DETERMINE IF A MATERIAL IS EXEMPT

**Table B.1. Monthly Average Radionuclide Concentrations Allowed for Release to Sewers as Authorized at 25 TAC 336.215**

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
Hydrogen (H)	1	H-3	1E-2				
Beryllium (Be)	4	Be-7	6E-3	Be-10	2E-4		
Carbon (C)	6	C-11	6E-2	C14	3E-4		
Fluorine (F)	9	F-18	7E-3				
Sodium (Na)	11	Na-22	6E-5	Na-24	5E-4		
Magnesium (Mg)	12	Mg-28	9E-5				
Aluminum (Al)	13	Al-26	6E-5				
Silicon (Si)	14	Si-31	1E-3	Si-32	4E-4		
Phosphorus (P)	15	P-32	9E-5	P-33	8E-4		
Sulfur (S)	16	S-35	1E-3				
Chlorine (Cl)	17	Cl-36	2E-4	Cl-38	3E-3	Cl-39	5E-3
Potassium (K)	19	K-40	4E-5	K-42	6E-4	K-43	9E-4
		K-44	5E-3	K-45	7E-3		
Calcium (Ca)	20	Ca-41	6E-4	Ca-45	2E-4	Ca-47	1E-4
Scandium (Sc)	21	Sc-43	1E-3	Sc-44m	7E-5	Sc-44	5E-4
		Sc-46	1E-4	Sc-47	4E-4	Sc-48	1E-4
		Sc-49	3E-3				
Titanium (Ti)	22	Ti-44	4E-5	Ti-45	1E-3		
Vanadium (V)	23	V-47	4E-3	V-48	9E-5	V-49	1E-2
Chromium (Cr)	24	Cr-48	8E-4	Cr-49	4E-3	Cr-51	5E-3
Manganese (Mn)	25	Mn-51	3E-3	Mn-52m	5E-3	Mn-52	1E-4
		Mn-53	7E-3	Mn-54	3E-4	Mn-56	7E-4
Iron (Fe)	26	Fe-52	1E-4	Fe-55	1E-3	Fe-59	1E-4
		Fe-60	4E-6				
Cobalt (Co)	27	Co-55	2E-4	Co-56	6E-5	Co-57	6E-4
		Co-58m	8E-3	Co-58	2E-4	Co-60m	2E-1
		Co-60	3E-5	Co-61	3E-3	Co-62m	7E-3
Nickel (Ni)	28	Ni-56	2E-4	Ni-57	2E-4	Ni-59	3E-3
		Ni-63	1E-3	Ni-65	1E-3	Ni-66	6E-5
Copper (Cu)	29	Cu-60	4E-3	Cu-61	2E-3	Cu-64	2E-3
		Cu-67	6E-4				
Zinc (Zn)	30	Zn-62	2E-4	Zn-63	3E-3	Zn-65	5E-5
		Zn-69m	6E-4	Zn-69	8E-3	Zn-71m	8E-4
		Zn-72	1E-4				
Gallium (Ga)	31	Ga-65	9E-3	Ga-66	1E-4	Ga-67	1E-3
		Ga-68	2E-3	Ga-70	1E-2	Ga-72	2E-4
		Ga-73	7E-4				
Germanium (Ge)	32	Ge-66	3E-3	Ge-67	6E-3	Ge-68	6E-4
		Ge-69	2E-3	Ge-71	7E-2	Ge-75	9E-3
		Ge-77	1E-3	Ge-78	3E-3		
Arsenic (As)	33	As-69	6E-3	As-70	2E-3	As-71	5E-4
		As-72	1E-4	As-73	1E-3	As-74	2E-4
		As-76	1E-4	As-77	6E-4	As-78	1E-3
Selenium (Se)	34	Se-70	1E-3	Se-73m	4E-3	Se-73	4E-4
		Se-75	7E-5	Se-79	8E-5	Se-81m	3E-3

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
Bromine (Br)	35	Se-81	1E-2	Se-83	4E-3		
		Br-74m	3E-3	Br-74	5E-3	Br-75	5E-3
		Br-76	5E-4	Br-77	2E-3	Br-80m	3E-3
		Br-80	1E-2	Br-82	4E-4	Br-83	9E-3
Rubidium (Rb)	37	Br-84	4E-3				
		Rb-79	8E-3	Rb-81m	4E-2	Rb-81	5E-3
		Rb-82m	2E-3	Rb-83	9E-5	Rb-84	7E-5
		Rb-86	7E-5	Rb-87	1E-4	Rb-88	4E-3
Strontium (Sr)	38	Rb-89	9E-3				
		Sr-80	6E-4	Sr-81	3E-3	Sr-82	3E-5
		Sr-83	3E-4	Sr-85m	3E-2	Sr-85	4E-4
		Sr-87m	6E-3	Sr-89	8E-5	Sr-90	5E-6
Yttrium (Y)	39	Sr-91	2E-4	Sr-92	4E-4		
		Y-86m	3E-3	Y-86	2E-4	Y-87	3E-4
		Y-88	1E-4	Y-90m	1E-3	Y-90	7E-5
		Y-91m	2E-2	Y-91	8E-5	Y-92	4E-4
Zirconium (Zr)	40	Y-93	2E-4	Y-94	4E-3	Y-95	7E-3
		Zr-86	2E-4	Zr-88	5E-4	Zr-89	2E-4
		Zr-93	4E-4	Zr-95	2E-4	Zr-97	9E-5
Niobium (Nb)	41	Nb-88	1E-2	Nb-89	1E-3	Nb-89	7E-4
				(22 min)		(122 min)	
		Nb-90	1E-4	Nb-93m	2E-3	Nb-94	1E-4
		Nb-95m	3E-4	Nb-95	3E-4	Nb-96	2E-4
Molybdenum (Mo)	42	Nb-97	3E-3	Nb-98	2E-3		
		Mo-90	3E-4	Mo-93m	6E-4	Mo-93	5E-4
		Mo-99	2E-4	Mo-101	7E-3		
Technetium (Tc)	43	Tc-93m	1E-2	Tc-93	4E-3	Tc-94m	3E-3
		Tc-94	1E-3	Tc-95m	5E-4	Tc-95	1E-3
		Tc-96m	2E-2	Tc-96	3E-4	Tc-97m	6E-4
		Tc-97	5E-3	Tc-98	1E-4	Tc-99m	1E-2
		Tc-99	6E-4	Tc-101	2E-2	Tc-104	4E-3
Ruthenium (Ru)	44	Ru-94	2E-3	Ru-97	1E-3	Ru-103	3E-4
		Ru-105	7E-4	Ru-106	3E-5		
Rhodium (Rh)	45	Rh-99m	2E-3	Rh-99	3E-4	Rh-100	2E-4
		Rh-101m	8E-4	Rh-101	3E-4	Rh-102m	2E-4
		Rh-102	8E-5	Rh-103m	6E-2	Rh-105	5E-4
		Rh-106m	1E-3	Rh-107	1E-2		
Palladium (Pd)	46	Pd-100	2E-4	Pd-101	2E-3	Pd-103	1E-3
		Pd-107	5E-3	Pd-109	3E-4		
Silver (Ag)	47	Ag-102	9E-3	Ag-103	5E-3	Ag-104m	4E-3
		Ag-104	3E-3	Ag-105	4E-4	Ag-106m	1E-4
		Ag-106	9E-3	Ag-108m	9E-5	Ag-110m	6E-5
		Ag-111	2E-4	Ag-112	4E-4	Ag-115	4E-3
Cadmium (Cd)	48	Cd-104	3E-3	Cd-107	3E-3	Cd-109	6E-5
		Cd-113m	5E-6	Cd-113	4E-6	Cd-115m	4E-5
		Cd-115	1E-4	Cd-117m	6E-4	Cd-117	6E-4
Indium (In)	49	In-109	3E-3	In-110	2E-3	In-110	7E-4
				(69.1 min)		(4.9 hr)	
		In-111	6E-4	In-112	2E-2	In-113m	7E-3
		In-114m	5E-5	In-115m	2E-3	In-115	5E-6
		In-116m	3E-3	In-117m	2E-3	In-117	8E-3
Tin (Sn)	50	In-119m	7E-3				
		Sn-110	5E-4	Sn-111	1E-2	Sn-113	3E-4
		Sn-117m	3E-4	Sn-119m	6E-4	Sn-121m	5E-4
		Sn-121	8E-4	Sn-123m	7E-3	Sn-123	9E-5

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
Antimony (Sb)	51	Sn-125	6E-5	Sn-126	4E-5	Sn-127	9E-4
		Sn-128	1E-3				
		Sb-115	1E-2	Sb-116m	3E-3	Sb-116	1E-2
		Sb-117	9E-3	Sb-118m	7E-4	Sb-119	2E-3
		Sb-120	2E-2	Sb-120	1E-4	Sb-122	1E-4
				(5.8d)			
		Sb-124m	3E-2	Sb-124	7E-5	Sb-125	3E-4
		Sb-126m	9E-3	Sb-126	7E-5	Sb-127	1E-4
		Sb-128	1E-2	Sb-128	2E-4	Sb-129	4E-4
		(10 min)		(9.01 hr)			
Tellurium (Te)	52	Sb-130	3E-3	Sb-131	2E-3		
		Te-116	1E-3	Te-121m	1E-4	Te-121	4E-4
		Te-123m	1E-4	Te-123	2E-4	Te-125m	2E-4
		Te-127m	9E-5	Te-127	1E-3	Te-129m	7E-5
		Te-129	4E-3	Te-131m	8E-5	Te-131	8E-4
		Te-132	9E-5	Te-133m	9E-4	Te-133	4E-3
		Te-134	3E-3				
Iodine (I)	53	I-120m	2E-3	I-120	1E-3	I-121	4E-3
		I-123	1E-3	I-124	2E-5	I-125	2E-5
		I-126	1E-5	I-128	8E-3	I-129	2E-6
		I-130	2E-4	I-131	1E-5	I-132m	1E-3
		I-132	1E-3	I-133	7E-5	I-134	4E-3
		I-135	3E-4				
Cesium (Cs)	55	Cs-125	1E-2	Cs-127	9E-3	Cs-129	3E-3
		Cs-130	1E-2	Cs-131	3E-3	Cs-132	4E-4
		Cs-134m	2E-2	Cs-134	9E-6	Cs-135m	1E-2
		Cs-135	1E-4	Cs-136	6E-5	Cs-137	1E-5
		Cs-138	4E-3				
Barium (Ba)	56	Ba-126	8E-4	Ba-128	7E-5	Ba-131m	7E-2
		Ba-131	4E-4	Ba-133m	4E-4	Ba-133	2E-4
		Ba-135m	4E-4	Ba-139	2E-3	Ba-140	8E-5
		Ba-141	3E-3	Ba-142	7E-3		
Lanthanum (La)	57	La-131	6E-3	La-132	4E-4	La-135	5E-3
		La-137	2E-3	La-138	1E-4	La-140	9E-5
		La-141	5E-4	La-142	1E-3	La-143	5E-3
Cerium (Ce)	58	Ce-134	8E-5	Ce-135	2E-4	Ce-137m	3E-4
		Ce-137	7E-3	Ce-139	7E-4	Ce-141	3E-4
		Ce-143	2E-4	Ce-144	3E-5		
Praseodymium (Pr)	59	Pr-136	1E-2	Pr-137	5E-3	Pr-138m	1E-3
		Pr-139	6E-3	Pr-142m	1E-2	Pr-142	1E-4
		Pr-143	2E-4	Pr-144	6E-3	Pr-145	4E-4
		Pr-147	1E-2				
Neodymium (Nd)	60	Nd-136	2E-3	Nd-138	3E-4	Nd-139m	7E-4
		Nd-139	1E-2	Nd-141	2E-2	Nd-147	2E-4
		Nd-149	1E-3	Nd-151	9E-3		
Promethium (Pm)	61	Pm-141	8E-3	Pm-143	7E-4	Pm-144	2E-4
		Pm-145	1E-3	Pm-146	2E-4	Pm-147	7E-4
		Pm-148m	1E-4	Pm-148	7E-5	Pm-149	2E-4
		Pm-150	7E-4	Pm-151	2E-4		
Samarium (Sm)	62	Sm-141m	4E-3	Sm-141	8E-3	Sm-142	1E-3
		Sm-145	8E-4	Sm-146	3E-6	Sm-147	4E-6
		Sm-151	2E-3	Sm-153	3E-4	Sm-1552	1E-2
		Sm-156	7E-4				
Europium (Eu)	63	Eu-145	2E-4	Eu-146	1E-4	Eu-147	4E-4
		Eu-148	1E-4	Eu-149	2E-3	Eu-150	4E-4

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )					
						(12.6 h)	
		Eu-150	1E-4	Eu-152m	4E-4	Eu-152	1E-4
		(34.2 y)					
		Eu-154	7E-5	Eu-155	5E-4	Eu-156	8E-5
		Eu-157	3E-4	Eu-158	3E-3		
Gadolinium (Gd)	64	Gd-145	6E-3	Gd-146	2E-4	Gd-147	3E-4
		Gd-148	3E-6	Gd-149	4E-4	Gd-151	9E-4
		Gd-152	4E-6	Gd-153	6E-4	Gd-159	4E-4
Terbium (Tb)	65	Tb-147	1E-3	Tb-149	7E-4	Tb-150	7E-4
		Tb-151	5E-4	Tb-153	7E-4	Tb-154	2E-4
		Tb-155	8E-4	Tb-156m	2E-3	Tb-156m	1E-3
				(5.0 hr)		(24.4 hr)	
		Tb-156	1E-4	Tb-157	7E-3	Tb-158	2E-4
		Tb-160	1E-4	Tb-161	3E-4		
Dysprosium (Dy)	66	Dy-155	1E-3	Dy-157	3E-3	Dy-159	2E-3
		Dy-165	2E-3	Dy-166	1E-4		
Holmium (Ho)	67	Ho-155	6E-3	Ho-157	4E-2	Ho-159	3E-2
		Ho-161	1E-2	Ho-162m	7E-3	Ho-162	1E-1
		Ho-164m	1E-2	Ho-164	3E-2	Ho-166m	9E-5
		Ho-166	1E-4	Ho-167	2E-3		
Erbium (Er)	68	Er-161	2E-3	Er-165	9E-3	Er-169	5E-4
		Er-171	5E-4	Er-172	2E-4		
Thulium (Tm)	69	Tm-162	1E-2	Tm-166	6E-4	Tm-167	3E-4
		Tm-170	1E-4	Tm-171	2E-3	Tm-172	1E-4
		Tm-173	6E-4	Tm-175	1E-2		
Ytterbium (Yb)	70	Yb-162	1E-2	Yb-166	2E-4	Yb-167	4E-2
		Yb-169	2E-4	Yb-175	4E-4	Yb-177	2E-3
		Yb-178	2E-3				
Lutetium (Lu)	71	Lu-169	3E-4	Lu-170	2E-4	Lu-171	3E-4
		Lu-172	1E-4	Lu-173	7E-4	Lu-174m	4E-4
		Lu-174	7E-4	Lu-176m	1E-3	Lu-176	1E-4
		Lu-177m	1E-4	Lu-177	4E-4	Lu-178m	8E-3
		Lu-178	6E-3	Lu-179	9E-4		
Hafnium (Hf)	72	Hf-170	4E-4	Hf-172	2E-4	Hf-173	7E-4
		Hf-175	4E-4	Hf-177m	3E-3	Hf-178m	3E-5
		Hf-179m	1E-4	Hf-180m	1E-3	Hf-181	2E-4
		Hf-182m	5E-3	Hf-182	5E-5	Hf-183	3E-3
		Hf-184	3E-4				
Tantalum (Ta)	73	Ta-172	5E-3	Ta-173	9E-4	Ta-174	4E-3
		Ta-175	8E-4	Ta-176	5E-4	Ta-177	2E-3
		Ta-178	2E-3	Ta-179	3E-3	Ta-180m	3E-3
		Ta-180	2E-4	Ta-182m	3E-2	Ta-182	1E-4
		Ta-183	2E-4	Ta-184	3E-4	Ta-185	4E-3
		Ta-186	1E-2				
Tungsten (W)	74	W-176	1E-3	W-177	3E-3	W-178	7E-4
		W-179	7E-2	W-181	2E-3	W-185	4E-4
		W-187	3E-4	W-188	7E-5		
Rhenium (Re)	75	Re-177	2E-2	Re-178	1E-2	Re-181	7E-4
		Re-182	9E-4	Re-182	2E-4	Re-184m	3E-4
		(12.7 hr)		(64.0 hr)			
		Re-184	3E-4	Re-186m	2E-4	Re-186	3E-4
		Re-187	8E-2	Re-188m	1E-2	Re-188	2E-4
		Re-189	4E-4				
Osmium (Os)	76	Os-180	1E-2	Os-181	2E-3	Os-182	3E-4
		Os-185	3E-4	Os-189m	1E-2	Os-191m	2E-3

Element	N	Radionuclides with monthly average concentration ( $\mu\text{Ci/ml}$ )						
Iridium (Ir)	77	Os-191	3E-4	Os-193	2E-4	Os-194	8E-5	
		Ir-182	6E-3	Ir-184	1E-3	Ir-185	7E-4	
		Ir-186	3E-4	Ir-187	1E-3	Ir-188	3E-4	
		Ir-189	7E-4	Ir-190m	2E-2	Ir-190	1E-4	
		Ir-192m	4E-4	Ir-192	1E-4	Ir-194m	9E-5	
Platinum (Pt)	78	Ir-194	1E-4	Ir-195m	1E-3	Ir-195	2E-3	
		Pt-186	2E-3	Pt-188	2E-4	Pt-189	1E-3	
		Pt-191	5E-4	Pt-193m	4E-4	Pt-193	6E-3	
		Pt-195m	3E-4	Pt-197m	2E-3	Pt-197	4E-4	
Gold (Au)	79	Pt-199	7E-3	Pt-200	2E-4			
		Au-193	1E-3	Au-194	4E-4	Au-195	7E-4	
		Au-198m	1E-4	Au-198	2E-4	Au-199	4E-4	
Mercury (Hg) organic	80	Au-200m	2E-4	Au-200	4E-3	Au-201	1E-2	
		Hg-193m	6E-4	Hg-193	3E-3	Hg-194	2E-6	
		Hg-195m	4E-4	Hg-195	2E-3	Hg-197m	5E-4	
Mercury (Hg) sulfate	80	Hg-197	9E-4	Hg-199m	1E-2	Hg-203	7E-5	
		Hg-193m	4E-4	Hg-193	2E-3	Hg-195	1E-4	
		Hg-195m	3E-4	Hg-195	2E-3	Hg-197m	4E-4	
Thallium (Tl)	81	Hg-197	8E-4	Hg-199m	8E-3	Hg-203	3E-4	
		Tl-194m	1E-2	Tl-194	4E-2	Tl-195	9E-3	
		Tl-197	1E-2	Tl-198m	4E-3	Tl-198	3E-3	
		Tl-199	9E-3	Tl-200	1E-3	Tl-201	2E-3	
Lead (Pb)	82	Tl-202	5E-4	Tl-204	2E-4			
		Pb-195m	8E-3	Pb-198	4E-3	Pb-199	3E-3	
		Pb-200	4E-4	Pb-201	1E-3	Pb-202m	1E-3	
		Pb-202	2E-5	Pb-203	7E-4	Pb-205	5E-4	
		Pb-209	3E-3	Pb-210	1E-7	Pb-211	2E-3	
Bismuth (Bi)	83	Pb-212	2E-5	Pb-214	1E-3			
		Bi-200	4E-3	Bi-201	2E-3	Bi-202	2E-3	
		Bi-203	3E-4	Bi-205	2E-4	Bi-206	9E-5	
		Bi-207	1E-4	Bi-210m	8E-6	Bi-210	1E-4	
Polonium (Po)	84	Bi-212	7E-4	Bi-213	1E-3	Bi-214	3E-3	
		Po-203	3E-3	Po-205	3E-3	Po-207	1E-3	
Astatine (At)	85	Po-210	4E-7					
Francium (Fr)	87	At-207	8E-4	At-211	2E-5			
Radium (Ra)	88	Fr-222	3E-4	Fr-223	8E-5			
		Ra-223	1E-6	Ra-224	2E-6	Ra-225	2E-6	
Actinium (Ac)	89	Ra-226	6E-7	Ra-227	3E-3	Ra-228	6E-7	
		Ac-224	3E-4	Ac-225	7E-6	Ac-226	2E-5	
Thorium (Th)	90	Ac-227	5E-8	Ac-228	3E-4			
		Th-226	7E-4	Th-227	2E-5	Th-228	2E-6	
		Th-229	2E-7	Th-230	1E-6	Th-231	5E-4	
Protactinium (Pa)	91	Th-232	3E-7	Th-234	5E-5			
		Pa-227	5E-4	Pa-228	2E-4	Pa-230	1E-4	
		Pa-231	6E-8	Pa-232	2E-4	Pa-233	2E-4	
Uranium (U)	92	Pa-234	3E-4					
		U-230	8E-7	U-231	6E-4	U-232	6E-7	
		U-233	3E-6	U-234	3E-6	U-235	3E-6	
		U-236	3E-6	U-237	3E-4	U-238	3E-6	
Neptunium (Np)	93	U-239	9E-3	U-240	2E-4	U-natural	3E-6	
		Np-232	2E-2	Np-233	1E-1	Np-234	3E-4	
		Np-235	3E-3	Np-236	9E-7	Np-236	5E-4	
				(1.2E5 yr)		(22.5 hr)		
		Np-237	2E-7	Np-238	2E-4	Np-239	2E-4	
		Np-240	3E-3					

Element	N	Radionuclides with monthly average concentration (μCi/ml)					
Plutonium (Pu)	94	Pu-234	1E-3	Pu-235	1E-1	Pu-236	6E-7
		Pu-237	2E-3	Pu-238	2E-7	Pu-239	2E-7
		Pu-240	2E-7	Pu-241	1E-5	Pu-242	2E-7
		Pu-243	2E-3	Pu-244	2E-7	Pu-245	3E-4
		Pu-246	6E-5				
Americium (Am)	95	Am-237	1E-2	Am-238	5E-3	Am-239	7E-4
		Am-240	3E-4	Am-241	2E-7	Am-242m	2E-7
		Am-242	5E-4	Am-243	2E-7	Am-244m	1E-2
		Am-244	4E-4	Am-245	4E-3	Am-246m	8E-3
		Am-246	4E-3				
Curium (Cm)	96	Cm-238	2E-3	Cm-240	1E-5	Cm-241	2E-4
		Cm-242	7E-6	Cm-243	3E-7	Cm-244	3E-7
		Cm-245	2E-7	Cm-246	2E-7	Cm-247	2E-7
		Cm-248	5E-8	Cm-249	7E-3	Cm-250	9E-9
Berkelium (Bk)	97	Bk-245	3E-4	Bk-246	4E-4	Bk-247	2E-7
		Bk-249	6E-5	Bk-250	1E-3		
Californium (Cf)	98	Cf-244	4E-3	Cf-246	5E-5	Cf-248	2E-6
		Cf-249	2E-7	Cf-250	3E-7	Cf-251	2E-7
		Cf-252	7E-7	Cf-253	5E-5	Cf-254	3E-7
Einsteinium (Es)	99	Es-250	6E-3	Es-251	1E-3	Es-253	2E-5
		Es-254m	4E-5	Es-254	2E-6		
Fermium (Fm)	100	Fm-252	6E-5	Fm-253	1E-4	Fm-254	4E-4
		Fm-255	7E-5	Fm-257	5E-6		
Mendelevium (Md)	101	Md-257	1E-3	Md-258	6E-6		
Any single radionuclide not listed above with decay mode other than alpha emission or spontaneous fission and with radioactive half-life greater than 2 hours							1E-7
Any single radionuclide not listed above that decays by alpha emission or spontaneous fission, or any mixture for which either the identity or the concentration of any radionuclide in the mixture is not known							2E-8

**Table B.2. Radionuclide Concentration and Annual Activity Limits for Disposal in a Type I Municipal Solid Waste Facility or a Hazardous Waste Facility According to 30 TAC 336.225(c) and 336.365 (Section 3.3)**

Radioisotope	Concentration Limit (Ci/m <sup>3</sup> )	Annual Generator Limit (Ci/yr)	Radioisotope	Concentration Limit (Ci/m <sup>3</sup> )	Annual Generator Limit (Ci/yr)
Fluorine-18	3E-1	8	Rhodium-106	1	30
Sodium-24	9E-4	2E-2	Ag-110m	2E-3	5E-2
Silicon-31	1E+2	3E+3	Cadmium-115m	2E-1	5
Phosphorus-32	2	50	Indium-111	9E-2	2
Phosphorus-33	10	3E+2	Indium-113m	9	2E+2
Sulfur-35	9	2E+2	Tin-113	6E-2	2
Argon-41	3E-1	8	Tin-119	20	5E+2
Potassium-42	2E-2	5E-1	Antimony-124	2E-3	5E-2
Calcium-45	4	1E+2	Iodine-123	4E-1	10
Calcium-47	2E-2	5E-1	Iodine-125	7E-1	20
Scandium-46	2E-3	5E-2	Iodine-131	4E-2	1
Chromium-51	6E-1	20	Iodine-133	2E-2	5E-1
Iron-59	5E-3	1E-1	Tellurium-129	2E-1	5
Cobalt-57	6E-2	2	Xenon-127	8E-2	2
Cobalt-58	1E-2	3E-1	Xenon-133	1	30
Zinc-65	7E-3	2E-1	Barium-140	2E-3	5E-2
Gallium-67	3E-1	8	Lanthanum-140	2E-3	5E-2
Selenium-75	5E-2	1	Cerium-141	4E-1	10
Bromine-82	2E-3	5E-2	Cerium-144	1E-3	3E-2
Rubidium-86	4E-2	1	Praseodymium-143	6	2E+2
Strontium-85	2E-2	5E-1	Neodymium-147	7E-2	2
Strontium-89	8	2E+2	Ytterbium-169	6E-2	2
Yttrium-90	4	1E+2	Iridium-192	1E-2	3E-1
Yttrium-91	4E-1	10	Gold-198	3E-2	8E-1
Zirconium-95	8E-3	2E-1	Mercury-197	8E-1	20
Niobium-95	8E-3	2E-1	Thallium-201	4E-1	10
Molybdenum-99	5E-2	1	Mercury-203	1E-1	3
Technetium-99m	1	30			

**Table B.3. Concentration Limits for Exemptions for Liquid ( $\mu\text{Ci/ml}$ ) and for Solids ( $\mu\text{Ci/g}$ ) According to 25 TAC 289.251(e)(1) and 289.251(l)(1) (see Section 5.1)**

Element (Atomic Number)	Isotope <sup>a</sup>	Concentration	Isotope <sup>a</sup>	Concentration
Antimony (51)	Sb-122	3E-4	Sb-124	2E-4
	Sb-125	1E-3		
Arsenic (33)	As-73	5E-3	As-74	5E-4
	As-76	2E-4	As-77	8E-4
Barium (56)	Ba-131	2E-3	Ba-140	3E-4
Beryllium (4)	Be-7	2E-2		
Bismuth (83)	Bi-206	4E-4		
Bromine (35)	Br-82	3E-3		
Cadmium (48)	Cd-109	2E-3	Cd-115m	3E-4
	Cd-115	3E-4		
Calcium (20)	Ca-45	9E-5	Ca-47	5E-4
Carbon (6)	C-14	8E-3		
Cerium (58)	Ce-141	9E-4	Ce-143	4E-4
	Ce-144	1E-4		
Cesium (55)	Cs-131	2E-2	Cs-134m	6E-2
	Cs-134	9E-5		
Chlorine (17)	Cl-138	4E-3		
Chromium (24)	Cr-51	2E-2		
Cobalt (27)	Co-57	5E-3	Co-58	1E-3
	Co-60	5E-4		
Copper (29)	Cu-64	3E-3		
Dysprosium (66)	Dy-165	4E-3	Dy-166	4E-4
Erbium (68)	Er-169	9E-4	Er-171	1E-3
Europium (63)	Eu-152 <sup>b</sup>	6E-4	Eu-155	2E-3
Fluorine (9)	F-18	8E-3		
Gadolinium (64)	Gd-153	2E-3	Gd-159	8E-4
Gallium (31)	Ga-72	4E-4		
Germanium (32)	Ge-71	2E-2		
Gold (79)	Au-196	2E-3	Au-198	5E-4
	Au-199	2E-3		
Hafnium (72)	Hf-181	7E-4		
Hydrogen (1)	H-3	3E-2		
Indium (49)	In-113m	1E-2	In-114m	2E-4
Iodine (53)	I-126	2E-5	I-131	2E-5
	I-132	6E-4	I-133	7E-5
	I-134	1E-3		
Iridium (77)	Ir-190	2E-3	Ir-192	4E-4
	Ir-194	3E-4		
Iron (26)	Fe-55	8E-3	Fe-59	6E-4
Lanthanum (57)	La-140	2E-4		
Lead (82)	Pb-203	4E-3		
Lutetium (71)	Lu-177	1E-3		
Manganese (25)	Mn-52	3E-4	Mn-54	1E-3
	Mn-56	1E-3		
Mercury (80)	Hg-197m	2E-3	Hg-197	3E-3
	Hg-203	2E-4		
Molybdenum (42)	Mo-99	2E-3		
Neodymium (60)	Nd-147	6E-4	Nd-149	3E-3
Nickel (28)	Ni-65	1E-3		
Niobium (Columbium) (41)	Nb-95	1E-3	Nb-97	9E-3
Osmium (76)	Os-185	7E-4	Os-191m	3E-2
	Os-191	2E-3		
			Os-193	6E-4

Element (Atomic Number)	Isotope <sup>a</sup>	Concentration	Isotope <sup>a</sup>	Concentration
Palladium (46)	Pd-103	3E-3	Pd-109	9E-4
Phosphorus (15)	P-32	2E-4		
Platinum (78)	Pt-191	1E-3	Pt-193m	1E-2
	Pt-197m	1E-2	Pt-197	1E-3
Polonium (84)	Po-210	7E-6		
Potassium (19)	K-42	3E-3		
Praseodymium	Pr-142	3E-4	Pr-143	5E-4
Promethium (61)	Pm-147	2E-3	Pm-149	4E-4
Radium (88)	Ra-226	1E-7	Ra-228	3E-7
Rhenium (75)	Re-183	6E-3	Re-186	9E-4
	Re-188	6E-4		
Rhodium (45)	Rh-103m	1E-1	Rh-105	1E-3
Rubidium (37)	Rb-86	7E-4		
Ruthenium (44)	Ru-97	4E-3	Ru-103	8E-4
	Ru-105	1E-3	Ru-106	1E-4
Samarium (62)	Sm-153	8E-4		
Scandium (21)	Sc-46	4E-4	Sc-47	9E-4
	Sc-48	3E-4		
Selenium (34)	Se-75	3E-3		
Silicon (14)	Si-131	9E-3		
Ag (47)	Ag-105	1E-3	Ag-110m	3E-4
	Ag-111	4E-4		
Sodium (11)	Na-24	2E-3		
Strontium (38)	Sr-85	1E-3	Sr-89	1E-4
	Sr-91	7E-4	Sr-92	7E-4
Sulfur (16)	S-35	6E-4		
Tantalum (73)	Ta-82	4E-4		
Technetium (43)	Tc-96m	1E-1	Tc-96	1E-3
Tellurium (52)	Te-125m	2E-3	Te-127m	6E-4
	Te-127	3E-3	Te-129m	3E-4
	Te-131m	6E-4	Te-132	3E-4
Terbium (65)	Tb-160	4E-4		
Thallium (81)	Tl-200	4E-3	Tl-201	3E-3
	Tl-202	1E-3	Tl-204	1E-3
Thulium (69)	Tm-170	5E-4	Tm-171	5E-3
Tin (50)	Sn-113	9E-4	Sn-125	2E-4
Tungsten(Wolfram ) (74)	W-181	4E-3	W-187	7E-4
Vanadium (23)	V-48	3E-4		
Ytterbium (70)	Yb-175	1E-3		
Yttrium (39)	Y-90	2E-4	Y-91m	3E-2
	Y-91	3E-4	Y-92	6E-4
	Y-93	3E-4		
Zinc (30)	Zn-65	1E-3	Zn-69m	7E-4
	Zn-69	2E-2		
Zirconium (40)	Zr-95	6E-4	Zr-97	2E-4
Beta and/or gamma emitting radioactive material not listed above with half-life less than 3 years			1E-6	

<sup>a</sup> m refers to the metastable state of that radioisotope.

<sup>b</sup> Value for the isotope Eu-152, with a half-life of 9.2 hours.

**Table B.4. Concentration Limits for Exemptions for Gases ( $\mu\text{Ci/ml}$ ) According to 25 TAC 289.251(e)(1) and 289.251(l)(1) (see Section 5.1)**

Element (Atomic Number)	Isotope	Concentration	Isotope	Concentration
Argon (18)	Ar-37	1E-3	Ar-41	1E-7
Bromine (35)	Br-82	4E-7		
Carbon (6)	C-14	1E-6		
Chlorine (17)	Cl-138	9E-7		
Fluorine (9)	F-18	2E-6		
Hydrogen (1)	H-3	5E-6		
Iodine (53)	I-126	3E-9	I-131	3E-9
	I-132	8E-8	I-133	1E-8
	I-134	2E-7		
Krypton (36)	Kr-85m	1E-6	Kr-85	3E-6
Sulfur (16)	S-35	9E-8		
Xenon (54)	Xe-131m	4E-6	Xe-133	3E-6
	Xe-135	1E-6		
Beta and/or gamma emitting radioactive material not listed above with half-life less than 3 years				1E-10

**Table B.5.Total Activity Limits for Exemptions of Individual Quantities per Container According to 25 TAC 289.251(e)(2) and 289.251(l)(2) (see Section 5.2)**

Isotope	μCi	Isotope	μCi	Isotope	μCi	Isotope	μCi
Antimony-122 (Sb-122)	100	Sb-124	10	Sb-125	10		
Arsenic-73 (As-73)	100	As-74	10	As-76	10	As-77	100
Barium-131 (Ba-131)	10	Ba-133	10	Ba-140	10		
Beryllium-7 (Be-7)	100						
Bismuth-210 (Bi-210)	1						
Bromine-82 (Br-82)	10						
Cadmium-109 (Cd-109)	10	Cd-115m	10	Cd-115	100		
Calcium-45 (Ca-45)	10	Ca-47	10				
Carbon-14 (C-14)	100						
Cerium-141 (Ce-141)	100	Ce-143	100	Ce-144	1		
Cesium-129 (Cs-129)	100	Cs-131	1,000	Cs-134m	100	Cs-134	1
		Cs-135	10	Cs-136	10	Cs-137	10
Chlorine-36 (Cl-36)	10	Cl-38	10				
Chromium-51 (Cr-51)	1,000						
Cobalt-57 (Co-57)	100	Co-58m	10	Co-58	10	Co-60	1
Copper-64 (Cu-64)	100						
Dysprosium-165 (Dy-165)	10	Dy-166	100				
Erbium-169 (Er-169)	100	Er-171	100				
Europium-152 (Eu-152), 9.2 hour half-life	100	Eu-152	1	Eu-154	1	Eu-155	10
		13 year					
Fluorine-18 (F-18)	1,000						
Gadolinium-153 (Gd-153)	10	Gd-159	100				
Gallium-67 (Ga-67)	100	Ga-72	10				
Germanium-68 (Ge-68)	10	Ge-71	100				
Gold-195 (Au-195)	10	Au-198	100	Au-199	100		
Hafnium-181 (Hf-181)	10						
Holmium-166 (Ho-166)	100						
Hydrogen-3 (H-3)	1,000						
Indium-111 (In-111)	100	In-113m	100	In-114m	10	In-115m	100
		In-115	10				
Iodine-123 (I-123)	100	I-125	1	I-126	1	I-129	0.1
		I-131	1	I-132	10	I-133	1
		I-134	10	I-135	10		
Iridium-192 (Ir-192)	10	Ir-194	100				
Iron-52 (Fe-52)	10	Fe-55	100	Fe-59	10		
Krypton-85 (Kr-85)	100	Kr-87	10				
Lanthanum-140 (La-140)	10						
Lutetium-177 (Lu-177)	100						
Manganese-52 (Mn-52)	10	Mn-54	10	Mn-56	10		
Mercury-197m (Hg-197m)	100	Hg-197	100	Hg-203	10		
Molybdenum-99 (Mo-99)	100						
Neodymium-147 (Nd-147)	100	Nd-149	100				
Nickel-59 (Ni-59)	100	Ni-63	10	Ni-65	100		
Niobium-93m (Nb-93m)	10	Nb-95	10	Nb-97	10		
Osmium-185 (Os-185)	10	Os-191m	100	Os-191	100	Os-193	100
Palladium-103 (Pd-103)	100	Pd-109	100				
Phosphorus-32 (P-32)	10						
Platinum-191 (Pt-191)	100	Pt-193m	100	Pt-193	100	Pt-197m	100
		Pt-197	100				
Polonium-210 (Po-210)	0.1						
Potassium-42 (K-42)	10	K-43	10				
Praseodymium-142 (Pr-142)	100	Pr-143	100				

Isotope	μCi	Isotope	μCi	Isotope	μCi	Isotope	μCi
Promethium-147 (Pm-147)	10	Pm-149	10				
Radon-222 (Rn-222)	100						
Rhenium-186 (Re-186)	100	Re-188	100				
Rhodium-103m (Rh-103m)	100	Rh-105	100				
Rubidium-81 (Rb-81)	10	Rb-86	10	Rb-87	10		
Ruthenium-97 (Ru-97)	100	Ru-103	10	Ru-105	10	Ru-106	1
Samarium-151 (Sm-151)	10	Sm-153	100				
Scandium-46 (Sc-46)	10	Sc-47	100	Sc-48	10		
Selenium-75 (Se-75)	10						
Silicon-31 (Si-31)	100						
Silver-105 (Ag-105)	10	Ag-110m	1	Ag-111	100		
Sodium-22 (Na-22)	10	Na-24	10				
Strontium-85 (Sr-85)	10	Sr-87m	10	Sr-89	1	Sr-90	0.1
		Sr-91	10	Sr-92	10		
Sulphur-35 (S-35)	100						
Tantalum-182 (Ta-182)	10						
Technetium-96 (Tc-96)	10	Tc-97m	100	Tc-97	100	Tc-99m	100
		Tc-99	10				
Tellurium-125m (Te-125m)	10	Te-127m	10	Te-127	100	Te-129m	10
		Te-129	100	Te-131m	10	Te-132	10
Terbium-160 (Tb-160)	10						
Thallium-200 (Tl-200)	100	Tl-201	100	Tl-202	100	Tl-204	10
Thulium-170 (Tm-170)	10	Tm-171	10				
Tin-113 (Sn-113)	10	Sn-125	10				
Tungsten-181 (W-181)	10	W-185	10	W-187	100		
Vanadium-48 (V-48)	10						
Xenon-131m (Xe-131m)	1,000	Xe-133	100	Xe-135	100		
Ytterbium-175 (Yb-175)	100						
Yttrium-87 (Y-87)	10	Y-88	10	Y-90	10	Y-91	10
		Y-92	100	Y-93	100		
Zinc-65 (Zn-65)	10	Zn-69m	100	Zn-69	1,000		
					0		
Zirconium-93 (Zr-93)	10	Zr-95	10	Zr-97	10		
Any radioactive material not listed above other than alpha emitting radioactive material							0.1

## APPENDIX C: RADIATION PRIMER

Radiation is the release of energy by the nucleus of an atom to obtain a more stable (but still radioactive) or a stable (non-radioactive) state, which is called a *decay*. Radioactive materials are detected and analyzed by measuring the radiation released by the material.

An atom consists of a nucleus in its center, containing most of the atomic mass, and electrons surrounding the nucleus, comprising most of the atomic volume. The nucleus is composed of a combination of two particles: protons and neutrons. Atoms with the same number of protons are of the same element. For example, all atoms with six protons are carbon atoms and all atoms with eight protons are oxygen atoms. The atomic number of an atom is the sum of the protons and neutrons in the nucleus.

Atoms of the same element (same number of protons) but with different number of neutrons are called *isotopes*. Isotopes of the same element have the same chemical properties but the nuclei may have different radioactive statuses. For example, beryllium (Be), which has four protons in its nucleus, has several isotopes: Be-7 (3 neutrons) has a half-life of 53.28 days and emits a gamma ray, Be-9 (5 neutrons) is stable, and Be-10 (6 neutrons) has a half-life of 1.5 million years and emits a beta particle. Both *radioisotope* and *radionuclide* are terms for an atom with a radioactive nucleus.

A metastable isotope is an atom whose nucleus has excess energy that will undergo radioactive decay by emitting the excess energy to become the isotope with a non-energized nucleus, which may still be radioactive. For example, Tc-99m will undergo radioactive decay and become the radioisotope Tc-99.

The excess energy released by the nucleus is either in the form of a light particle, also known as a photon (this is *non-ionizing* radiation), or an energized charged particle (this is *ionizing* radiation). Each type of radiation interacts with matter differently, and thus different types of detectors are required to detect and measure each type. The different kinds of detectors used to measure radiation are not discussed in this primer. The three main types of radiation are:

1. A *gamma ray*, which is a photon emitted by the nucleus (in contrast to an x-ray which is a photon emitted by changes in the position of the electrons inside an atom to a lower energy state).
2. A *beta particle*, which is an electron.
3. An *alpha particle*, which is a helium nucleus (two protons and two neutrons).

The lifespan of a specific radioisotope is measured by its half-life, which is the amount of time required for half of these radioisotopes to decay. For example: Cesium-137 (atomic number, 137; its nucleus has 55 protons and 82 neutrons) has a half-life of 30 years and, in 30 years, 2 grams of Cs-137 will have decayed to 1 gram.

A related concept is the *decay constant*, which is the probability that the radionuclide will decay within a specified time. The decay constant can be calculated using the half-life as shown in equation C.1. The decay constant of Cs-137 is 0.023 per year. A Cs-137 atom has a 2.3% probability of decaying in any year. The equation to determine how many radioactive isotopes remain after a period of time is shown in equation C.2

$$\text{Eqn. C.1} \quad \lambda = \frac{\ln(2)}{T_{1/2}}$$

$\lambda$  is the radioactive decay constant.

$\ln(2)$  is the natural log of 2, which is equal to 0.69315

$T_{1/2}$  = half-life.

$$\text{Eqn. C.2} \quad N(t) = N_0 e^{-\lambda t}$$

$N(t)$  is the number of radioactive isotopes at time  $t$ .

$N_0$  is the initial number of radioactive isotopes (at  $t = 0$ ).

$t$  is time.

The activity of a radioactive material is the number of decays that happen per unit time and is measured in units of counts per minute, disintegrations per minute, becquerel (Bq, one disintegration per second), or curie (Ci,  $3.7 \times 10^{10}$  disintegrations per second). The becquerel is the International System (SI) unit. Activity is measured by radiation detectors and can be calculated using equation C.3:

$$\text{Eqn. C.3} \quad A = \lambda N$$

$A$  is the activity.

$N$  is the number of atoms.

Radiation detectors only detect some of the radiation that enters the detector. Careful calibration of the instrument allows one to determine what percentage of radiation is detected, which is called the efficiency of the detector. The efficiency depends on the radiation type and its energy. Counts per minute (cpm) are the number of radiation particles that are detected (counted) in a minute. Disintegrations per minute (dpm) are the actual number of radiation particles emitted; dpm is calculated in equation D.4.

$$\text{Eqn. C.4} \quad \text{dpm} = \frac{\text{cpm}}{\text{efficiency}}$$

Additionally, radiation is present in the background due to naturally occurring radioactive materials and cosmic rays. This background radiation is not included in the radiation measurements to determine if a waste is at or below the exemption limits, unless the rule for that specific exemption stipulates that background be included. Therefore, a background count is typically measured (in an area close to the waste but at a sufficient distance so that the radioactivity in the waste does not affect the measurement) using the same radiation detector before measuring the waste sample. The background activity value is then subtracted from the measured activity value of the waste to obtain the activity value for the waste.

**APPENDIX IVI  
LIQUID WASTE SOLIDIFICATION PLAN**

# LIQUID WASTE SOLIDIFICATION 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

**Submitted To:** City of Edinburg  
Department of Solid Waste Management  
8601 North Jasman Road  
Edinburg, Texas 78542 USA

**Submitted By:** Golder Associates Inc.  
500 Century Plaza Drive, Suite 190  
Houston, TX 77073 USA

November 2017

Project No. 1401491

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

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 PURPOSES ONLY

## **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 constructed 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(s) will include basins that may vary in size.

#### **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. 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. In addition, the bottom of the basin will be at least 10 ft above the top of protective cover soil of the underlying constructed lining system.

#### **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 decommissioned, the City will either repurpose the metal basin for beneficial use, place it back into existing pit and fill with soil, or dispose it at the active working face. Any repurposed metal basin must 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 stabilizing material and effective processing to adequately stabilize the liquid waste.

### **2.3 Processing**

Using an excavator or similar mixing equipment, the liquid wastes will be mixed with a stabilizing material (see Appendix IVH, Special Waste Acceptance Plan) or soil 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 stabilized, the waste will be removed from the basin and deposited in the active face for landfilling.

### **2.4 Verification**

If necessary, a 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.