MSW AUTH NO. 2284A

PART IV – SITE OPERATING PLAN

CITY OF EL PASO, TEXAS
GREATER EL PASO LANDFILL MAJOR AMENDMENT
PROJECT NO. 155488

REVISION 0
OCTOBER 31, 2024

Part IV Landfill Permit Amendment
Site Operating Plan
MSW Auth No. 2284A

prepared for

City of El Paso, Texas
Greater El Paso Landfill Major Amendment
El Paso County, Texas

Project No. 155488

Revision 0, October 31, 2024

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List of Abbreviations

Abbreviation	Term/Phrase/Name
ADC	alternate daily cover
AST	aboveground storage tank
CESQG	Conditionally Exempt Small Quantity Generators
CFCs	chlorinated fluorocarbons
CFR	Code of Federal Regulations
Clint Landfill	Clint Landfill MSW Permit No. 1482
cy	cubic yards
DOT	Department of Transportation
EPA	United States Environmental Protection Agency
GEP Landfill or facility	Greater El Paso Landfill Municipal Solid Waste Permit No. 2284A
GLER	Geomembrane Liner Evaluation Report
hp	horsepower
IPaC	Information for Planning and Conservation
lbs	pounds
mg/kg	milligram per kilogram
MSW	municipal solid waste
NSPS	New Source Performance Standards
Owner/Operator	City of El Paso
PCB	polychlorinated biphenyl
RACM	Regulated asbestos containing material
SLER	Soils and Liner Evaluation Report
SOP	Site Operating Plan
TCEQ	Texas Commission of Environmental Quality
USFWS	U.S. Fish and Wildlife Service
yd	yard

IV.1.0 Introduction [30 TAC §330.65(a)]

The Greater El Paso Landfill Municipal Solid Waste Permit No. 2284A (GEP Landfill or facility), is an existing facility located in southeast El Paso County approximately 26 miles from downtown El Paso, Texas, 3.5 miles northeast of Clint, and 6 miles southeast of Horizon City. The GEP Landfill is located immediately east of Interstate Highway 10 at Darrington Road. The GEP Landfill is owned and operated by the City of El Paso (owner/operator).

The GEP Landfill is approximately 311 acres in size. The owner/operator acquired the property which covers portions of Section 16 and 25 in Block 78, TSP4 of T&P surveys in 1981, 1995, and 1996. The City is the sole owner of the property which was purchased from Texas Pacific Land Trust.

The GEP Landfill is located east of and adjacent to the existing Clint Landfill MSW Permit No. 1482 (Clint Landfill). The two landfills share a common boundary and other features including the entrance road, fee collection station/field office, maintenance building, and fuel storage building. The two landfills also share all personnel and motorized vehicles. The fuel storage building houses a 10,000-gallon steel aboveground storage tank (AST) used for storage of diesel. The maintenance building is used for the routine maintenance of vehicles and equipment, as well as for storage of materials.

There is one entrance to the facility via Darrington Road located near the northwestern corner of the subject property. Patrons are able to bring solid waste to the facility, where it is disposed of in various landfill cells. Access to the facility is controlled by toll collections and scale operations. The perimeter of the facility is bound by an approximately six-foot-high chain link fence or equivalent. During non-work hours, gates at the entrance of the facility are locked.

The GEP Landfill is located in a generally undeveloped area east of the City of El Paso. There are no drains or surface areas at the site known to be connected to navigable waters of the United States.

The GEP Landfill has been divided into two parcels by a utility easement that bisects the property into a north parcel and south parcel. The parcels were developed independently of each other and will remain as such after closure due to the easement. Phase 1 is located north of the utility easement, while Phase 2 is located south of the utility easement. Defined individual cells represent discrete construction limits for extending the landfill base excavation and lining system.

This Site Operating Plan (SOP) is intended to provide general guidance for facility management for day-to-day operations at the GEP Landfill. The SOP will facilitate facility operation in compliance with applicable Texas Commission of Environmental Quality (TCEQ) regulations and current standards of practice in the industry, compatible with the design of the facility. The landfill operations reflect standards of practice in the solid waste industry and are compatible with the facility's permitted design. This SOP will also serve as a reference source and is to be used as a training tool for landfill personnel. The annual acceptance rate provided in this SOP is 2,000 tons per day. The quantities of waste received are expected to increase in conjunction to both population increase and economic activity. Unusual events such as extreme storms will cause temporary increases in the quantity of waste received.

Plans and procedures referenced in this SOP are either included as Appendices to the permit application or other permit documents. These documents, as modified from time to time and approved by the TCEQ, are made a part of the operating record. Compliance with these plans and procedures is required by this SOP.

In concert with the operating requirements presented in the main body of this SOP, the owner/operator will follow the other guidelines established in the appendices of this SOP.

IV.2.0 Recordkeeping Requirements [30 TAC §§330.121(a), 330.123, 330.125, 330.675]

To comply with 30 TAC §330.121(a), these plans and documents are part of the Site Operating Record. Any deviation from the permit and incorporated plans or other related documents associated with the permit is a violation of 30 TAC §330.

In accordance with 30 TAC §330.123, the owner/operator will provide written notice in the form of a Soils and Liner Evaluation Report (SLER) and/or Geomembrane Liner Evaluation Report (GLER) detailing the construction and lining of a new disposal cell. The reports will be submitted to the TCEQ for review 14 days prior to the placement of any waste in the new cell. With the exception of the initial opening of the landfill, if verbal or written response from the TCEQ is not provided by the end of the 14th day following TCEQ receipt of the report(s), placement of solid waste may begin. All SLER and GLER approvals will be maintained in the Site Operating Record.

In accordance with 30 TAC §330.125(a), a copy of the permit, the approved Site Development Plan, the Site Operating Plan, the Final Closure Plan, the Post-closure Maintenance Plan, the Landfill Gas Management Plan, and any other required plan or other related document will be maintained at the landfill field office, located at the address below.

Environmental Services
City of El Paso
7969 San Paulo Dr.
El Paso, Texas 79907

The owner/operator will, within seven working days of completion or receipt of analytical data, as appropriate, record and retain in the operating record all information required by 30 TAC §330.125(b).

The information listed in **Table IV.2-1** will be recorded and retained in the Site Operating Record, per 30 TAC §330.125(c). The executive director will be notified in writing annually of each significant addition to the Site Operating Record.

The Site Operating Record will be maintained in an organized format which allows the information to be easily located and retrieved. All information contained in the Site Operating Record will be furnished upon request to the TCEQ executive director and will be made available for inspection by the executive director.

All information contained within the Site Operating Record and the different required plans will be retained for the active life of the facility including the post-closure care period as required by 330.125(d).

In accordance with 30 TAC §330.125(e), personnel training records will be maintained in accordance with 30 TAC §335.586(d) and (e).

In accordance with 30 TAC §330.125(f), the owner/operator will maintain personnel operator licenses issued in accordance with 30 TAC, Chapter 30, Subchapter F (relating to Municipal Solid Waste Facility Supervision) as required.

Consistent with 30 TAC §330.125(g) the executive director may set an alternative schedule for recordkeeping and notification.

To comply with 30 TAC §330.125(h), records documenting the annual waste acceptance rate will be maintained in the Site Operating Record. The annual acceptance rate will be documented on the quarterly and annual solid waste summary reports required by 30 TAC §330.675. The Waste Acceptance Plan form is provided in Part I/II, Appendix I/II.C – Waste Acceptance Plan. Whenever the annual waste acceptance rate exceeds the estimated waste acceptance rate, and the increase is not due to a temporary occurrence, the owner/operator will file an application to modify the permit application, including the revised estimated waste acceptance rate, in accordance with 30 TAC §305.70(k) within 90 days of the exceedance as recognized by the sum of the most recent four quarterly summary reports. The requested modification will include any necessary adjustments to the SOP to accommodate a larger waste acceptance rate.

Table IV.2-1: Recordkeeping Schedule

Records To Be Maintained	Rule Citation
All location restriction demonstrations	§330.125(b)(1)
Inspection records, training procedures, and notification procedures relating to excluding the receipt of prohibited waste	§330.125(b)(2)
All results from gas monitoring and any remediation plans relating to explosive and other gases (if required)	§330.125(b)(3)
Unit design documentation for leachate or gas condensate placement	§330.125(b)(4)
Groundwater monitoring and corrective action demonstration, certification, findings, monitoring, testing, and analytical data	§330.125(b)(5)
Closure and post-closure care plans and any monitoring, testing, or analytical data relating to post-closure requirements	§330.125(b)(6)
Any and all cost estimates and financial assurance documentation relating to financial assurance for closure and post-closure	§330.125(b)(7)
Any and all information demonstrating continued compliance with the small community exemption criteria	§330.125(b)(8)
Copies of all correspondence and responses relating to the operation of the facility, modifications to the permit, approvals, and other matters pertaining to technical assistance	§330.125(b)(9)
Any and all documents, manifests, trip tickets, etc., involving special waste	§330.125(b)(10)
Records of the application rate and total amount of any spray-applied alternative daily cover applied to the working face, if applicable	§330.125(b)(11)
Any other document(s) as specified by the approved permit or by the executive director	§330.125(b)(12)
Personnel training records in accordance with 30 TAC §335.586(d) and (e)	§330.125(e)
Personnel operator licenses in accordance with Chapter 30, Subchapter F	§330.125(f)
Alternative schedules and notification requirements, if applicable	§330.125(g)
Records to document the annual waste acceptance rate, including quarterly solid waste summary reports and the annual solid waste summary reports required by 30 TAC §330.603	§330.125(h)
Load inspection records	§330.127(5)(B)
Fire occurrence notices	§330.129
Inspection records and training procedures relating to fire prevention and site safety	§330.129
Access control breach and repair notices	§330.131

Records To Be Maintained	Rule Citation
All site inspection and maintenance documentation	§330.131
Record(s) of each unauthorized material removal event	§330.133(b)
Record of alternative operating hours, if applicable	§330.135(d)
Records of all landfill marker inspections	§330.143(a)
Reports and other submittals pertaining to landfill gas monitoring	§330.159
Water, crude oil and/or natural gas well location and plugging reports, if applicable	§330.161(a)-(c)
Cover inspection records	§330.165(h)

IV.3.0 Site Management and Personnel [30 TAC §330.127]

This SOP includes provisions for site management and the site operating personnel to meet the general and site-specific requirements of 30 TAC §330.127. This SOP will be retained during the active life of the facility and throughout the post-closure care maintenance period.

IV.3.1 Landfill Personnel [30 TAC §330.127(1)]

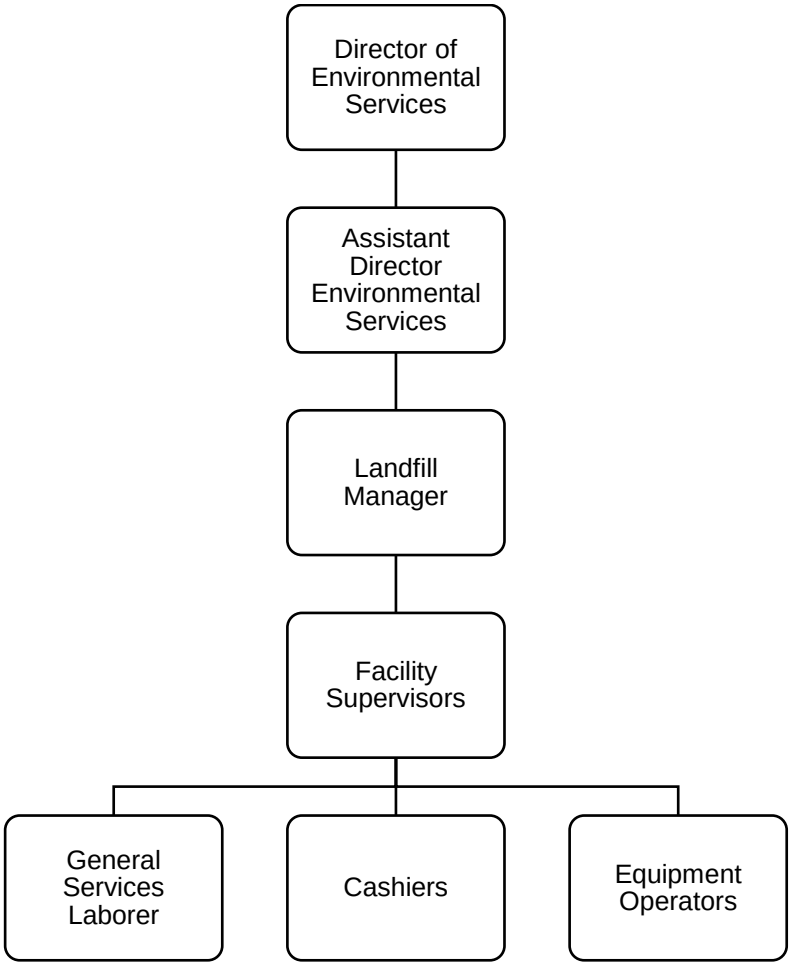
Table IV.3-1 summarizes personnel types and descriptions.

Table IV.3-1: Personnel Types and Descriptions

Position Title	Minimum Qualifications	Position Function
Landfill Manager	Must obtain and maintain a Class A license in accordance with 30 TAC §30, Subchapter F. Training by the General Manager in the SOP requirements.	Overseeing all landfill activities.
Facility Supervisor	Must obtain and maintain a Class A license in accordance with 30 TAC §30, Subchapter F.	Responsible for: Managing working face, daily fill, and cover placement operations; Landfill equipment maintenance and repair; Personnel safety during waste and cover constructions.
Equipment Operator	Six months minimum experience in equipment operation or on the job training by experienced equipment operators in SOP requirements for daily cover and unauthorized waste.	Grading and excavating, necessary equipment maintenance, waste leveling and compaction, application of daily cover, and general site road maintenance. Operators are also responsible for keeping the working face in the smallest area practical and screening for unauthorized waste.
Cashiers	Training by Landfill Manager in the SOP rules, record keeping requirements, and waste screening training course (e.g., I.I.E.D.).	Levies fees on landfill customers. Operates the scale, keeps appropriate records, controls site access screens for unauthorized waste, and provides general customer direction and information.
General Services Laborer	Internal safety training and personal protective equipment training, and waste screening.	General facility maintenance. Picks up windblown litter as directed. Performs as “spotter”, directing traffic at the disposal area.

An organizational chart for the solid waste operations is presented as **Figure IV.3-1**.

Figure IV.3-1: Solid Waste Operations Organizational Chart



Note: The Director of Environmental Services will be the acting Landfill Manager when the Landfill Manager is not present. To be eligible to act for the Landfill Manager, the Director of Environmental Services will have the same training including certification as the Landfill Manager.

IV.3.2 Equipment [30 TAC §330.127(2)]

Table IV.3-2 summarizes the equipment used at the facility. The equipment type, number, size, and function are also included. The daily waste acceptance rate is monitored by weigh scale and compiled by software for use in preparing the quarterly and annual waste reports. Changes to equipment numbers will be implemented when the average daily tonnage indicated by four quarterly report volumes falls in a different range as described in **Section IV.2.0**.

Table IV.3-2: GEP Landfill Facility Equipment List

Equipment Type	Number (Minimum)	Typical Size	Function
Dozers	1	240 horsepower (hp) or greater	Waste and soil spreading and compaction
Scraper	1	20 cubic yards (cy) or greater	Transportation of daily cover, firefighting support
Compactor	1	80,000 pounds (lbs) or greater	Waste spreading and compaction
Water Truck	1	At least 2500 gallons	Dust control, firefighting support
Water Tank	1	2500 gallons	Firefighting support
Portable Litter Screens	1	10 feet by 10 feet high	Active face litter control
Road Grader or Maintainer	1	Size varies, between 30,000 and 60,000 lbs	Grading of access roads, soil spreading
Excavator	1	2 cy Bucket or greater	Excavation of daily cover and other excavation projects
Articulated Hauler	1	20 cy or greater	Transportation of daily cover
Front End Bucket Loader	1	188 hp, 3.3 cy	Aggregate/waste handler
Roll Off	1	40 yard (yd) capacity	Material hauler
Backhoe	1	92 hp, 24,000 lb	Aggregate handler/digger
Submersible Leachate Pumps	1 per sump	Size varies	Transfer of leachate from sumps
Electronic Liquid Level Indicators	1 per sump	Size varies	Monitor leachate level in sumps
Diesel Aboveground Storage Tank	1	10,000 gallons	Diesel fuel storage
Articulated Hauler	1	Size varies	Transportation of soil

In addition to the items identified in **Table IV.3-2**, miscellaneous pickup trucks, and other light utility vehicles as well as various water pumps, instruments, and safety and training equipment will be on-site as necessary for operational efficiency.

Backup equipment will be available at the site, kept at an alternative location, or will be secured via contract as needed. The minimum types of machinery listed above should be operable at all times at the site. Backup equipment is available through the City of El Paso and includes one of each of the items listed above.

In the event of equipment repairs or during equipment maintenance periods, the facility will obtain equipment from other facilities, contractors, or local rental companies to avoid interruption of waste services.

IV.3.3 Operational Requirements [30 TAC §330.127(3)]

Table IV.3-3 outlines the site inspection and maintenance list for the facility. The item, task, frequency, inspector, and inspection documentation are also included.

Table IV.3-3: Site Inspection and Maintenance List – Operational Requirements

Item	Task	Frequency	Inspector	Inspection Documentation
Fence/Gates	Inspect perimeter fence and gates for damage. Make repairs if necessary	Weekly	Landfill Manager or Designee	Document in the Site Operating Record
Windblown Waste	Police working face area, wind fences, access roads, entrance areas, and perimeter fence for loose trash. Clean up as necessary.	Daily as specified in **Section IV.9.0**	Landfill Manager or Designee	Document in the Site Operating Record
Waste Spilled on Route to the Site	Police the entrance areas and all roads at least 2 miles from the site entrances for loose trash. Clean up as necessary.	Daily as specified in **Section IV.12.0**	Landfill Manager or Designee	Document in the Site Operating Record
Landfill Markers	Inspect all landfill markers for damage, color-coding, and general location. Correct or replace damaged markers within 15 days of discovery.	Monthly	Landfill Manager or Designee	Document in the Site Operating Record
Site Access Road	Inspect site access road for damage from vehicle traffic, erosion, or excessive mud accumulation. Maintain as needed. Grading equipment will be used to control or remove mud accumulations on roads as well as minimize depressions, ruts, and potholes.	Daily Inspection, Grading: weekly, more often during wet weather or extended dry weather periods. Tracked mud removal: Daily when mud is present on road.	Landfill Manager or Designee	Document in the Site Operating Record
Daily Cover	Inspect for proper placement, thickness, and compaction. Correct problems as needed. Verify that vectors are not an issue.	Daily at the active face and all daily cover areas will be inspected.	Landfill Manager or Designee	Document in the Site Operating Record
Intermediate Cover	Inspect for proper placement, thickness, erosion, and compaction, and for presence of waste or other contamination. Correct problems as needed.	Bi-weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document in the Site Operating Record

Item	Task	Frequency	Inspector	Inspection Documentation
Final Cover	Inspect for proper placement, thickness, compaction, slope, settlement, and erosion. Maintenance will be ongoing throughout post-closure care period. Correct problems as needed.	Bi-weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document in the Site Operating Record
Site Signs	Inspect all site signs for damage, general location, and accuracy of posted information.	Weekly	Landfill Manager or Designee	Document in the Site Operating Record
Ponded Water	Inspect site for unauthorized ponded water areas as described in **Section IV.23.0**. Correct problems as needed.	Bi-weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document in the Site Operating Record
Odor	Inspect the perimeter of the site to access the performance of site operations to control odor.	Daily	Landfill Manager or Designee	Document in the Site Operating Record
Perimeter Channels/ Ponds	Inspect perimeter channels and detention ponds to verify that they are functioning as designed (e.g., excess sediment removed, outlet structures intact, erosion control measures intact).	Weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document in the Site Operating Record
Leachate Depth	Measure depth of leachate	Monthly	Landfill Manager or Designee	Document in the Site Operating Record

IV.3.4 Training Requirements [30 TAC §330.127(4)]

Per 30 TAC §330.127(4), the permittee will comply with 30 TAC §335.586(a) and (c). The permittee will further ensure that personnel are familiar with safety procedures, contingency plans, the requirements of the Commission's rules and this permit, commensurate with their levels and positions of responsibility, in accordance with the Part III – Site Development Plan and this SOP.

Job positions and applicable training are listed in **Table IV.3-4**. Additional details of each job position are provided in **Table IV.3-1**.

Table IV.3-4: Job Positions and Training Requirements

Position	Training													
	Site Orientation	Site Operations	Endangered Species	Haz Waste Identification	Safety (job specific)	Fire Prevention	Load Inspection	Unauthorized Wastes	SPCC	Emergency Response	LF License	Equipment Operator License	Litter Control	Random Inspection	SWPP
Landfill Manager	X	X	X	X	X	X	X	X	X	X	A	-	X	X	X
Facility Supervisor	X	X	X	X	X	X	X	X	X	X	A	-	X	X	X
Cashier	X	X	X	X	X	X	X	X	X	X	-	-	X	X	X
Equipment Operator	X	X	X	X	X	X	X	X	X	X	-	B	X	X	X
General Services Laborer	X	X	X	X	X	X	X	X	X	X	-	-	X	X	X

Notes:

The owner/operator will ensure that the Landfill Manager or Designee and supervisors at the site are knowledgeable in the proper operation of a municipal solid waste (MSW) landfill and the current operational standards required by the TCEQ. The Landfill Manager or Designee and supervisors will be experienced in managing and supervising and will maintain a Class A license, as defined, and detailed in 30 TAC §30, Subchapter F. It will be the responsibility of the Landfill Manager or Designee and supervisors to ensure that all landfill personnel are properly trained and are operating the landfill in accordance with this SOP and operation standards required by the permit and the TCEQ MSW regulations.

In accordance with 30 TAC §335.586(a)(1), the personnel training program will be directed by a person trained in waste management procedures and will include instruction that teaches facility personnel waste management procedures and contingency plan implementation relevant to the positions in which they are employed.

New employees will receive a comprehensive overview of all aspects of landfill operations, focusing on information that is necessary to protect the health and welfare of the new employee and enable them to perform their duties in accordance with this SOP and operational standards required by the permit and the TCEQ MSW regulations.

In accordance with 30 TAC §335.586(a)(2), the facility training program will be designed to ensure that personnel are able to respond effectively to emergencies by familiarizing them with applicable emergency

procedures, emergency equipment, and emergency systems. Following initial training, new employee training will continue during periodic training sessions consisting of on-the-job training.

Training meetings will be scheduled and conducted for all employees at least once per month. If a regular monthly meeting is cancelled, it will be rescheduled or combined with the scheduled training the next month. Training sessions will be scheduled for all site operations to be uninterrupted. Records of personnel attending each training session and the topics covered will be maintained in the Site Operating Record. Topics for training may vary, but will be conducted annually for the following:

- Safety
- Fire protection, prevention, and evacuation
- Fire extinguisher use
- First Aid
- Litter control and windblown waste pick-up
- Hazardous waste and polychlorinated biphenyl (PCB) waste detection and control (waste screening), if applicable
- Unauthorized waste management
- Properties of methane gas and safety procedures for methane gas, if applicable
- Random inspection procedures

Facility personnel will take part in an annual review of their initial training in accordance with 30 TAC §335.586(c). A written description of the type and amount of introductory and continued training provided to each employee will be maintained in the facility Site Operating Record.

IV.3.5 Detection and Prevention of the Disposal of Unauthorized Wastes [30 TAC §330.127(5)]

The following is a description of facility operations related to the detection and prevention of prohibited wastes, in accordance with 30 TAC §330.127(5).

The acceptance and disposal of the following prohibited wastes, including those wastes listed in 30 TAC §330.15(e), will not be allowed at this site:

- Regulated Hazardous Waste as defined by 30 TAC §330.3(133) will not be accepted for disposal except from Conditionally Exempt Small Quantity Generators (CESQG) as allowed by regulations. 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.
- PCBs wastes, as defined under 40 Code of Federal Regulations (CFR), Part 761, will not be accepted for disposal or disposed.
- Lead acid storage batteries will not be intentionally or knowingly accepted for disposal.
- Do-it-yourself used motor vehicle oil will not be intentionally or knowingly accepted for disposal.
- Used oil filters from internal combustion engines will not be intentionally or knowingly accepted for disposal.
- Whole used or scrap tires will not be accepted for disposal or disposed.
- Items containing chlorinated fluorocarbons (CFCs), such as refrigerators, freezers, and air conditioners, will only be accepted at the site if the CFCs have been evacuated from the unit and 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 previously. Such verification will 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. The facility will notify persons who may deliver such items of the requirement to verify evacuation of refrigerant by signage or letter.

- Liquid waste (any waste material that is determined to contain "free liquids" as deemed by United States Environmental Protection Agency (EPA) Method 9095 (Paint Filter Test), as described in "Test Methods for Evaluating Solid Wastes, Physical chemical Methods" (EPA Publication Number SW-846)) will not be disposed of unless it is:
  - Bulk or non-containerized liquid waste that is:
    - Household waste other than septic waste; or
    - Contained liquid waste; and
      - 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 Asbestos Containing Materials will not be disposed.
- Radioactive materials as defined in 30 TAC Chapter 336, except as authorized in 30 TAC Chapter 336 will not be accepted.
- Class 1 Industrial Waste will not be accepted or disposed.
- Class 2 industrial wastes that are expected to interfere with facility operations will not be accepted.
- Other wastes prohibited or unauthorized by regulation or not allowed by the facility permit will not be accepted or disposed.

IV.3.5.1 Measures for Controlling Unauthorized Wastes

Procedures to detect and control the receipt of unauthorized wastes include:

- Informing facility customers of unauthorized waste by posting one or more signs at the facility entrance listing unauthorized wastes.
- Providing customers (regular and one-time or occasional) with a written list of unauthorized waste.
- Informing all drivers of incoming waste hauling vehicles and operators of any transfer stations that have indicated they will deliver waste to the facility for disposal of unauthorized wastes by:
  - Posting one or more signs at the facility entrance listing unauthorized waste.
  - Providing all vehicle drivers and transfer station operators with a written list of unauthorized waste.
- Facility personnel training and activities:
  - Training for appropriate facility personnel responsible for inspecting or observing incoming loads to recognize regulated hazardous waste and PCB waste (30 TAC §330.127(5)(C)).
  - Random inspections of incoming loads in accordance with procedures described in this section.
  - Maintaining records of all inspections.
  - Notification to the executive director, and any local pollution agency with jurisdiction that has requested to be notified, of any incident involving a regulated hazardous waste or PCB waste at the landfill (30 TAC §330.127(5)(D)).
  - Remediation of any regulated hazardous waste or PCB waste discovered at the site in accordance with 30 TAC §335.349 (30 TAC §330.127(5)(E)).

Facility personnel will check for indications of unauthorized waste as detailed below.

An important aspect of controlling the receipt of unauthorized waste at the landfill is by the control of access into the facility by unauthorized vehicles. This issue is addressed in 30 TAC §330.131 Access Control. Facility personnel will be trained to inspect vehicles and identify regulated hazardous waste, PCB waste and other prohibited or unauthorized wastes. At a minimum, the personnel at the working face will be trained in inspection procedures for unauthorized waste. The personnel will be trained on an on-the-job basis by their supervisors. Records of employee training on unauthorized waste control procedures will be maintained in the facility Site Operating Record. The personnel will be trained to look for the following indications of unauthorized waste:

- Hazardous waste or PCB labels
- Department of Transportation (DOT) hazard placards or markings
- Liquids
- 55-gallon drums
- 85-gallon drums
- Powders or dusts
- Odors or chemical fumes
- Bright or unusual colored wastes
- Sludges

If landfill personnel identify any of the above indications with an incoming load, then that load will be directed to an area out of the flow of traffic, and the personnel will further assess the load.

In accordance with 30 TAC §330.127(5)(B), personnel will document removal of unauthorized waste and all load inspections in the Site Operating Record.

If the load is determined to contain unauthorized waste or if there is any possibility that it may be unauthorized waste, the load will be rejected and directed back to the generator. All landfill personnel will be diligent in looking for trucks bringing in waste loads from potential sources of unauthorized waste such as industrial facilities, microelectronics, manufacturers, electronic companies, metal plating industry, automotive and vehicle repair service companies, and dry-cleaning establishments.

IV.3.5.2 Random Inspections [30 TAC §330.127(5)(A)]

Incoming waste is controlled in three ways to preclude the inadvertent receipt of unauthorized waste. One level of control is to inform customers of the types of waste that are to be excluded. A second control is to inform all vehicle drivers and transfer station operators of the restrictions. Key personnel will be informed of the typical visible characteristics of these materials. A third control is through random inspections, to include inspections of compactor vehicles. In addition to random inspections, trained staff will observe each load that is disposed at the landfill.

Random inspections by the landfill personnel will be performed daily at an occurrence of no less than one percent (1%) of incoming loads. Inspections will be performed at the waste disposal area. Inspections based on internal profiling procedures will count towards the total of random inspections. Once the load selected for inspection arrives at the waste disposal area, a landfill employee will direct the vehicle out of the flow of normal landfill traffic. As the load is dumped, the landfill personnel will visually inspect the contents.

Records of all inspections will be maintained as part of the Site Operating Record. The results of these inspections will be documented on the Load Inspection Report Form and Waste Inspection Screening Form, if applicable. The reports will include the date and time of inspection, the name and address of the

hauling company and driver, the type of the vehicle, the size and the source of the load, contents of the load, indicators of prohibited waste, and results of the inspection.

IV.4.0 Fire Protection [30 TAC §330.129]

IV.4.1 Fire Protection Plan

The following steps are taken regularly at the facility by designated personnel to prevent fires:

- Prohibiting open burning of waste at all times at the landfill.
- Preventing burning waste from incoming waste loads from being dumped in the active area of the landfill. The Cashiers and equipment operators will be alert for signs of burning waste such as smoke, steam, or heat being released from incoming waste loads.
- Fuel spills will be contained and cleaned up immediately. Soil contaminated with spilled fuel will be excavated and, if authorized, disposed of at the working face. Contaminated soils may be excavated using a shovel for small areas or with heavy equipment as appropriate.
- Landfill equipment will not remain in the vicinity of exposed waste overnight.
- Equipment that is used at the working face will be routinely cleaned through the use of high-pressure water or steam cleaners. The high-pressure water or steam cleaning will remove combustible waste and caked material which can cause equipment to overheat and increase of fire potential. If equipment is cleaned at the working face, the amount of water used to clean will be minimized.
- Dead trees, brush, or vegetation adjacent to the landfill will be removed immediately, and grass and weeds mowed at least semi-annually so that forest, grass, or brush fires cannot spread to the landfill or off-site.
- Smoking is not permitted on the active areas of the landfill site or near the brush grinding operation.
- Soil cover will be used on a daily basis.

IV.4.2 Procedures in the Event of a Fire

Landfill staff will take the following steps if a fire is discovered:

- Contact the El Paso Fire Department by dialing 911. The nearest fire department will be notified via emergency dispatch.
- Alert other facility personnel.
- Contact the Director and Assistant Director of the City of El Paso Environmental Services.
- Assess the extent of fire, possibilities for the fire to spread, and alternatives for extinguishing the fire.
- Immediately direct vehicles out of the fire area and prevent unnecessary vehicles from entering the area.
- If it appears that the fire can be safely fought with available firefighting devices until the arrival of the Local Fire Department, attempt to contain or extinguish the fire.
- Upon arrival of Local Fire Department personnel, direct them to the fire and provide assistance as appropriate.
- Do not attempt to fight the fire alone. Do not attempt to fight the fire without adequate personal protective equipment. Be familiar with the use and limitations of firefighting equipment available onsite.

IV.4.3 Firefighting Methods

Firefighting methods for burning solid waste include smothering with soil, separating burning material from other waste, and spraying with water if available from an on-site water truck or detention pond. Small fires may be controlled with hand-held extinguishers. If the fire is at an active disposal area, if possible, the burning waste will be isolated or pushed away immediately before the fire can spread or firebreaks will be cut around the fire before it can spread. If moving the waste is not possible, or if it is unsafe, efforts will be made to cover the working face with earth immediately to smother the fire. The faster that soil can be placed over the fire, the more effective this method will be in controlling and extinguishing the fire. If a fire is in the working face, the burning area will be isolated and pushed away from the working face quickly, or firebreaks will be cut around the fire before it can spread. If this is not possible or is unsafe, efforts to cover the working face with earth will be initiated immediately to smother the fire. The stockpiled daily earthen cover material may be used for firefighting purposes. A reserve water tank will be maintained and dedicated to firefighting.

If a fire occurs on a vehicle or piece of equipment, the equipment operator will bring the vehicle or equipment to a safe stop. If safety personnel allow, the vehicle will be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine will be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment.

IV.4.3.1 Earthen Material Coverage

A stockpile of earthen material adequately sized to cover the working face will be maintained at all times within 2,000 feet of the working face or active disposal area. The source will be sized to cover the working face with a six-inch layer of earthen material within one hour of detecting a fire. The maximum size of the working face will be approximately 75,000 square feet. For covering this size of working face, the required stockpile will be 1,389 cubic yards, as calculated below.

Maximum size of working face = 75,000 square feet
Required stockpile = 75,000 square feet. x 0.5 feet x (1 cy/ 27 cubic feet) = 1,389 cy

The operator will maintain sufficient equipment for moving the soil stockpile and placing a six-inch soil cover over the working face within one hour of detecting a fire at the working face. This earthen volume would be distributed across the working face by one of the earthmovers required on-site (a front-end loader or bulldozer, see **Table IV.3-2**). Additional equipment will be used, if applicable, to smother the fire within one hour of being detected.

Example calculations for the length of time to cover the working face are provided in **Table IV.4-1**.

Table IV.4-1: Example Calculations for Time to Cover

Item	Value	Calculation
Volume of Daily Cover	1,389 cy	
Size of Haul Trucks	23 cy	
Number of Haul Trucks	4	
Number of Loads	61	1,389 cy ÷ 23 cy/truck = 60.4 loads
Time to Load	2 min	
Average Truck Speed	15 mph	
Average Truck Speed	1320 ft/min	15 mph x 5280 ft/mi ÷ 60 min/hr
Average Truck Time Round Trip:	3 min	2000 ft ÷ 1320 ft/min x 2 ways
Length of Time to Cover Working Face	76 min	(2 min + 3 min) x 61 trips ÷ 4 trucks
Distance from Working Face	2000 ft	

IV.4.4 Fire Equipment

The facility will be equipped with fire extinguishers of a type, size, location, and number as recommended by the local fire department. Each fire extinguisher will be fully charged and ready for use at all times. Each extinguisher will be inspected on an annual basis and recharged as necessary. A qualified service company will perform these inspections, and all extinguishers will display a current inspection tag. Inspection and recharging will be performed following each use. The fee station, maintenance building, fuel storage building, all landfill equipment, and landfill vehicles will be equipped with fire extinguishers.

Landfill equipment and vehicles will not return to work if the equipped fire extinguisher(s) was used and has not been replaced or refilled.

IV.4.5 Fire Protection Training

Training of on-site personnel in the use of fire extinguishers, fire prevention, response, and fire protection aspects of the SOP will be provided by established professionals on an annual basis. Personnel will be familiar with the use and limitations of firefighting equipment available onsite. Records of this training will be included in the Site Operating Record.

IV.4.6 TCEQ Notification

After any fire (related to waste management activities that cannot be extinguished within 10 minutes of discovery) occurs, the TCEQ regional office will be contacted. The notification to the regional office will include:

- Contact by telephone as soon as possible, but no later than four hours following the fire discovery, and
- Provide a well-written description of the cause and extent of the fire and the resulting fire response within 14 days of fire detection.

Landfill fires frequently cause concern on the part of nearby landowners, who turn to the TCEQ's regional office for information. Because of this, the facility will provide the appropriate TCEQ regional office as much information as possible regarding the fire and firefighting efforts, as soon as possible after the fire occurs.

The fire prevention and fire control procedures for the facility will be revisited following the occurrence of a significant fire to determine if modifications are warranted.

IV.5.0 Access Control [30 TAC §330.131]

IV.5.1 Site Security

Public access will be controlled to minimize unauthorized vehicular traffic, unauthorized and illegal dumping, and public exposure to hazards associated with landfills. Controlled access will be obtained by at least six-foot tall chain link security fences, or equivalent, and gates. An eight-foot gate controls access at the paved road entrance near the IH-10 and Darrington Road interchange. Two gates are located at each end of a utility easement that bisects the site. These gates will remain locked, and keys are limited to the owner(s) of the utility and the Landfill Manager or Designee. Conspicuous warning signs (NO TRESPASSING) legible from a distance of at least 25 feet will be placed at intervals on the fence surrounding the site. The fee collection booth and maintenance facility will be lighted after sundown.

IV.5.2 Vehicle Access

Public access roads to the landfill are paved, all-weather roads as described in **Section IV.16.0**. Only vehicles authorized by the Landfill Manager or Designee, landfill construction vehicles, landfill personnel vehicles, and authorized haul vehicles have access beyond the scale house or facility entrance. Only authorized haul vehicles or vehicles authorized by the Landfill Manager or Designee are allowed access to the working face. Signage will provide direction to customers and the public to the public entrances of the landfill. Speed limit and directional signs will be placed. On-site signage within the facility will provide direction to public unloading areas.

Vehicles transporting solid waste arriving at the waste disposal working face will be directed to an unloading area by facility personnel or signage. Operations at the working face will be conducted in a manner that allows the prompt and efficient unloading of waste. The approach to the unloading area will be wide enough to safely unload at least two vehicles side-by-side.

Facility personnel will comply with the schedule and notification requirements provided in **Table IV.5-1** for any access breach. Provisions for temporary and permanent repairs may include contracting equipment and materials in order to maintain access control and to direct personnel to oversee access points while repairs are performed.

Table IV.5-1: Notification Requirements

Requirements	Access Breach Repaired within 8 hours	Access Breach Not permanently repaired in 8 hours
Notify region office of breach and repair schedule	Not required	Within 24 hours
Make temporary repairs	Not required	Within 24 hours
Make permanent repairs	Within 8 hours	Within schedule submitted to regional office in initial notice
Notify regional office when permanent repair completed	Not required	Within schedule submitted to regional office in initial notice

IV.6.0 Unloading of Waste [30 TAC §330.133]

In accordance with 30 TAC §330.133(a), the unloading of solid waste will be confined to as small an area as practical. The maximum size of the unloading area will be 300 feet in length by 250 feet in width. There will be at most two unloading areas, one for commercial haulers and one for residential haulers. Trained staff will monitor all incoming loads at each unloading area during operating hours.

In accordance with 30 TAC §330.133(b), the unloading of waste in unauthorized areas is prohibited. Any waste deposited in an unauthorized area will be removed immediately and disposed of properly. A trained employee will be present at all times during operating hours to monitor all incoming loads of waste and will direct traffic to the designated unloading area. Trained personnel will also be on duty during operating hours at the working face to direct and monitor unloading of solid waste.

Trained personnel will monitor the incoming waste. These personnel will be familiar with the rules and regulations governing the various types of waste that can or cannot be accepted into the facility, including knowledge of 30 TAC §330.133. The facility is not required to accept any solid waste that may cause problems in maintaining full and continuous compliance with the permit. The staff involved with unloading or inspection of waste will have 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. A record of unauthorized material removal will be maintained in the Site Operating Record.

Certain wastes are prohibited from disposal at this facility. Prohibited wastes are described in **Section IV.3.5** of this plan. The unloading of unauthorized wastes at the facility will not be allowed. In accordance with 30 TAC §330.133(c), necessary steps will be taken by the landfill operator to ensure compliance. Any prohibited waste will be returned immediately to the transporter or generator of the waste or otherwise properly managed by the facility. The driver may be advised where the waste may be disposed of legally and will be responsible for the proper disposal of this rejected waste.

If 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 facility and properly dispose of the waste. In the event that identification is not possible, the Landfill Manager or Designee/supervisor will notify the TCEQ and seek guidance on how to dispose of the waste as soon as practical.

IV.7.0 Facility Operating Hours [30 TAC §330.135]

In accordance with 30 TAC §330.135 (a), (b), and (c), the hours of waste operations are to be as follows:

- The waste acceptance hours are from 7:00 a.m. to 4:00 p.m. Monday through Saturday. These hours will be posted on a sign at the entrance to the landfill.
- The site operating hours are between 5:00 a.m. and 7:00 p.m. seven days a week. Transportation of materials and heavy equipment operation outside operating hours is not allowed.
- During special clean-up events such as neighborhood clean-up days, and after damaging storms or similar natural events, the site may observe a modified schedule, as necessary, with the authorization of the TCEQ. Steps for modifying the schedule due to severe weather are presented in the Severe Weather plan located in **Section IV.28.0**.

Daily cover will be applied as soon as possible, but not more than one hour after closure to the public on the working face.

In accordance with 30 TAC, §330.135(d), the facility operator will record in the Site Operating Record the dates, times, and duration when any alternative operating hours are utilized.

IV.8.0 Site Sign [30 TAC §330.137]

A conspicuous sign measuring a minimum of four feet by four feet with letters at least three inches in height stating the type of site, the hours and days of operation, an emergency 24-hour contact phone number(s) that reaches an individual with the authority to obligate the facility at all times that the facility is closed, the local emergency fire department phone number, and the permit number will be maintained at the site entrances through which waste is received.

The sign will be visible and readable from the facility entrance. A sign prohibiting receipt of hazardous waste will be posted near the facility entrance or gatehouse.

IV.9.0 Control of Windblown Solid Waste and Litter [30 TAC §330.139]

In accordance with 30 TAC §330.139(1), windblown waste and litter will be controlled through several methods, including proper unloading compaction and cover procedures. The use of portable litter control fences and adequate staffing also will provide control of windblown waste and litter. Portable fencing of sufficient height to control windblown solid waste and litter will be utilized along the downwind side of the active disposal area if the wind exceeds ten miles per hour. In accordance with 30 TAC §330.139(2), personnel will police the landfill site, including fences, access roads, and the entrance gate, every operating day to pick up and return windblown waste and litter to the active working face and perform other litter control measures, as necessary.

Daily cover will be placed on top of the waste lift as soon as it is practical for any portion of the lift that reaches recommended lift height. The working face will be covered daily.

IV.10.0 Easements and Buffer Zones [30 TAC §330.141]

Three easements are located within the landfill site. A 60-foot easement divides the site into two portions. At the time of this document, El Paso Natural Gas Company, LLC, El Paso Electric, and Texas Gas Service share this easement. A 50-foot easement and a 100-foot easement, both owned by El Paso Natural Gas, are located along the eastern portion of the 60-foot easement.

In accordance with 30 TAC §330.141(a), no solid waste unloading, storage, disposal, or processing operations will occur within any easement, buffer zone, or right-of-way that crosses the site. 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 executive director. All pipeline and utility easements are clearly marked with posts which extend at least six feet above ground level, spaced at intervals no greater than 300 feet.

In accordance with 30 TAC §330.141(b), and as stated in 30 TAC §330.543, the buffer zones may vary around the perimeter of the site, but in no case will they be less than 50 feet. All buffer zones, as depicted in the site design, will be clearly marked as specified by TCEQ rules. Perimeter roads, which provide space for the safe passage and movement of operations and emergency firefighting and other vehicles, are located within the buffer zone area. Drainage structures, berms, and landscaping as necessary for visual screening are also located in the buffer zone area.

IV.11.0 Landfill Markers and Benchmark [30 TAC §330.143]

The Landfill markers are steel or wooden posts (or other TCEQ-approved material) and extend at least 6 feet above the ground surface. To comply with 30 TAC §330.143(a), the markers will be maintained to be unobscured by vegetation and will be placed in sufficient numbers to clearly indicate the required boundaries. Markers that are removed or destroyed will be replaced within 15 days of their removal or destruction. Markers determined not to meet regulatory requirements will be replaced within 15 days. Landfill markers will be inspected on a monthly basis and will be maintained and repaired on a scheduled basis. Records of all inspections will be maintained in the Site Operating Record. Markers are repainted, repaired, or replaced to maintain visibility within 15 days.

Landfill markers clearly mark significant features as described in 30 TAC §330.143(b). The executive director may modify specific marker requirements to accommodate unique site-specific conditions. Landfill marker requirements in accordance with 30 TAC §330.143 are provided in **Table IV.11-1**.

Table IV.11-1: Landfill Marker Requirements

Marker	Color	Marker Placement
Site Boundary	Black	Placed at each corner of the site and along each boundary line at intervals no greater than 300 feet.
Buffer Zone	Yellow	Placed at each boundary corner and along each boundary line at intervals no greater than 300 feet.
Easements	Green	Placed along the centerline of an easement and along the boundary of a right-of-way at each corner within the facility and at the intersection of the facility boundary at intervals no greater than 300 feet.
Grid System	White	Placed no greater than 100 feet apart measured along perpendicular lines. Where markers cannot be seen from opposite boundaries, intermediate markers must be installed, where feasible.
Liner Area	Red	Placed so that all areas for which a SLER/GLER has been submitted and approved by the TCEQ are readily determinable.
Floodplain	Blue	Placed at intervals no greater than 300 feet or closer to retain visual continuity at any area within the 100-year floodplain.

A landfill grid system will be installed unless written approval from the executive director has been received. The grid system will encompass at least the area expected to be filled within the next three-year period and marks will be spaced no greater than 100 feet apart measured along perpendicular lines. Where markers cannot be seen from opposite boundaries, intermediate markers will be installed, where feasible.

The SLER/GLER markers will be placed so that approved areas can be readily determined and maintained through construction and operation period. These markers will be located so that they are not destroyed during operations. The location of the liner markers will be tied into the landfill grid system and will be reported on each SLER or GLER submitted. The liner area markers will not be placed inside construction areas.

No 100-year floodplains are present within the facility; however, flood protection markers will be installed for any area within the facility if it is determined to be within the 100-year floodplain, and areas subject to flooding will be clearly marked by means of permanent posts not more than 300 feet apart or closer if necessary to retain visual continuity.

A permanent benchmark is established in an area at the facility that is readily accessible and is not used for disposal. The benchmark is a bronze survey marker set in concrete with the benchmark elevation and date stamped on it. The benchmark is surveyed from a known United Stated Coast and Geodetic Survey benchmark or other reliable benchmark. Coordinates and Elevation of Site Permanent Benchmark:

Latitude: 31° 36' 08.0395" N
Longitude: 106° 09’ 48.641” W
Elevation: 3986.67 feet above mean sea level (msl) (NAVD88)
Elevation: 3976.28 feet above mean sea level (msl) (COEP)
Delta Elevation Difference = -10.39 feet (NAVD88 – 10.39 feet = COEP)

IV.12.0 Materials Along the Route to the Site [30 TAC §330.145]

The owner/operator will take steps to encourage that vehicles hauling waste to the landfill are enclosed or provided with a tarpaulin, net, or other means to effectively secure the load in order to prevent the escape of any part of the load by blowing or spilling. The owner/operator will take actions such as posting signs, reporting offenders to proper law enforcement officers, adding surcharges, or similar measures. At least once each day that the landfill is in operation, the operator will clean up waste materials spilled along and within the right-of-way of public access roads serving the facility for a distance of two miles in either direction from any entrances (as measured along the roadway) used for the delivery of waste to the facility. The owner/operator will consult with the Texas Department of Transportation or county and/or local governments with maintenance authority over the roads concerning cleanup of public access roads and rights-of-way. The owner/operator will maintain and advertise a phone number for the public to call and report windblown waste from the landfill or trucks.

IV.13.0 Disposal of Large Items [30 TAC §330.147]

In accordance with 30 TAC §330.147(a), large, heavy, or bulky items which cannot be incorporated in the regular spreading, compaction, and covering operations at landfills will be recycled, when feasible. A special area may be established to collect these items. This special collection area will be designated as a large-item salvage area. Facility personnel will remove the items from the site often enough to prevent these items from becoming a nuisance and to preclude the discharge of any pollutants from the area.

In accordance with 30 TAC §330.147(b), items 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. To comply with 30 TAC §330.147(c), refrigerators, freezers, air conditioners, and any other items containing CFCs will be handled in accordance with 40 CFR §82.156(f), as amended.

For large items that are not excluded from the disposal waste stream, care will be taken to ensure that:

- Large items are excluded from the initial five feet of waste placed over the protective cover of a liner.
- Large items are placed such that they do not interfere with continued waste filling.
- Other smaller, MSW is placed and compacted around the large items.

IV.14.0 Odor Management Plan [30 TAC §330.149]

The facility will comply with all applicable rules concerning burning and air pollution control. The owner/operator will ensure that any unit of the MSW facility does not violate any applicable requirement of the approved state implementation plan developed under the Federal Clean Air Act, §110, as amended, and 30 TAC §330.15(d) of this title (relating to General Prohibitions), which prohibits the open burning of waste at any municipal solid waste landfill facility.

The owner/operator will ensure that the municipal solid waste facility does not violate any applicable air quality requirement in Part III, Appendix III.H – Landfill Gas Management Plan.

The site will be operated in accordance with the New Source Performance Standards (NSPS) for MSW landfills.

Odors will be controlled at the site, and if they occur, they will be reduced in accordance with the Odor Management Plan.

IV.14.1 Odor Management Plan

Sources of Odor. Potential odor sources associated with a MSW landfill include the wastes being delivered to the landfill, the open working face, ponded water, leachate, and landfill gas. Many of the wastes received at a landfill are a source of odor upon receipt, such as sludges and dead animals. Other wastes have the potential for becoming sources as they biodegrade during the decomposition process. Ponded water and landfill gas could become sources of odor as well.

Odor Control. Methods used to control odors include waste management procedures, the placement of cover materials, the control of ponded water, landfill gas control, and appropriate leachate management. These methods, described below, are also included in Part III, Appendix III.H – Landfill Gas Management Plan as appropriate.

Wastes will be deposited at the working face, spread into layers that can be readily compacted, and covered with daily cover, per 30 TAC §330.165(a) in order to control odors. Dead animals will be covered immediately upon placement into the working face with three feet of waste or two feet of soil. Waste that is identified as particularly odorous by the gate attendant or equipment operator will be buried immediately upon receipt in the working face with prompt compaction and covered with incoming waste and/or daily cover. Leachate is collected in sumps and managed in accordance with the Part III, Appendix III.C – Leachate and Contaminated Water Plan. Leachate collected will be monitored for odors. If odors from the leachate management areas are observed, materials may be used to neutralize and reduce odors or leachate may be disposed off-site at an authorized facility.

If these methods are unsuccessful, additional measures may include limiting the size of the working face, increasing the thickness of cover, identifying wastes streams that require special attention, and using misters or chemical deodorizers.

IV.15.0 Disease Vector Control [30 TAC §330.151]

The need for control of vectors such as rodents, flies, and mosquitoes at landfills will be minimized through daily site operations, which include the application of daily, intermediate, and final cover, as well as proper waste compaction. The facility will also minimize the extent of the working face to control vectors. Other approved methods for disease control will be implemented on an as-needed basis.

On an as-needed basis, a pest control professional, or licensed Structural Pest Control Applicator, will be summoned to eradicate any pests.

IV.16.0 Site Access Roads [30 TAC §330.153]

The permanent access road to the site is a paved road extending from a point 500 feet north of the intersection of Interstate Highway 10 and Darrington Road. The facility will abide by the following aspects regarding site access roads.

In accordance with 30 TAC §330.153(a), tracked mud and associated debris at the entrance to the facility and on the public roadway at the entrance to the facility and trash on public roadways will be removed at least once per day on days when mud and associated debris are being tracked onto the public roadway. For tracking of mud and trash onto public roadways, the paved entrance road will provide mud control for the waste hauling vehicles prior to exiting the site and returning to public access roads. Street-sweeper-type equipment will be used to remove mud accumulations on roads. The facility will keep records to demonstrate compliance with the requirement.

Dust from on-site and other access roadways will not become a nuisance to surrounding areas. Per 30 TAC §330.153(b), a water source and necessary equipment or other means of dust control approved by the TCEQ executive director will be provided. For dust from on-site and other access roadways, the landfill haul roads and access roads will be maintained in a reasonable dust-free condition by periodic spraying from a water truck.

In accordance with 30 TAC §330.153(c), all on-site and other access roadways will be maintained in a clean and safe condition. Litter and any other debris on-site and other access roadways will be picked up at least daily and taken to the disposal area to the extent that landfill staff can accomplish the task in one day.

Access roadways will be graded to minimize depressions, ruts, and potholes at least once per week. For maintenance of on-site and other access roadways, the operator may stockpile concrete rubble, masonry, or other similar material used in maintaining passable access roads. Grading equipment will be used as necessary to control or remove mud accumulations on roads.

IV.17.0 Salvaging and Scavenging [30 TAC §330.155]

Scavenging is prohibited at this facility.

Salvaging will not be allowed to interfere with prompt sanitary disposal of solid waste or to create public health nuisances. Salvaging of materials from the facility is permitted only by specific contract with specific salvaging contractors approved by the owner/operator. Salvaged materials will be considered as potential recyclable materials and will be stored in a designated collection area. The collection area will be identified in the site operating record. Salvaged items will be recycled often enough to prevent excessive accumulation of the material at the site in order to prevent odor or other nuisance conditions from developing and to eliminate the risk of discharge of pollutants.

Pesticide, fungicide, rodenticide, and herbicide containers will not be salvaged unless they are salvaged through a state-supported recycling program. Salvaging of special waste will be prohibited. Salvaging of wastes will not occur where waste has been covered with daily cover.

IV.18.0 Endangered Species Protection [30 TAC §330.157]

Neither the facility nor its operation will result in the destruction or adverse modification of the critical habitat of endangered or threatened species or cause or contribute to the taking of endangered or threatened species. If endangered or threatened species are encountered during site operations, Texas Parks and Wildlife and U.S. Fish and Wildlife Service (USFWS) will be notified within 48-hours.

Prior to facility development, Dr. Richard D. Worthington, Ph.D. of Floristic Inventories of the Southwest Program, conducted an intensive survey to determine the presence of any threatened and endangered species at the facility. The survey indicated that no endangered or threatened species were found on the subject site. Two species of concern were encountered: the Texas horned lizard and the sand prickly pear cacti. Dr. Worthington estimated that no more than five lizards were present. Five clumps of sand prickly pear were found on the site; however, the plant vigor was marginal and quite stressed. In accordance with 30 TAC §330.157, the landfill site development was considered not likely to impact endangered or threatened species. There is no protection plan for threatened or endangered species required for this facility as a result of this survey.

The generation and review of the USFWS's Information for Planning and Conservation (IPaC) report for the permitted boundary was conducted and compared to the results of the aforementioned survey. No critical habitat of endangered or threatened species was identified within the permitted boundary, as supported by the survey results. The referenced IPaC is presented as Part I/II, Appendix I/II.H – Location Restrictions.

IV.19.0 Landfill Gas Control [30 TAC §330.159]

Landfill gases will be monitored in accordance with the approved Landfill Gas Management Plan (Part III, Appendix III.H) in accordance with 30 TAC §330.63(g). The required reports and other submittals will be included in the Site Operating Record of the facility and submitted to the executive director.

IV.20.0 Oil, Gas, and Water Wells [30 TAC §330.161]

In accordance with 30 TAC §330.161(a), water wells that are used for supply will comply with all applicable regulations and be approved by the TCEQ. Water wells that are abandoned and any water wells discovered during development or facility operations will be capped, plugged and closed in accordance with all applicable rules, and the executive director will be notified of the discovery in writing, to include location of the well and written certification that the well has been capped, plugged, and closed in accordance with all applicable rules and regulations, within 30 days of discovery.

The executive director may approve any well used to supply water at the facility that is located within the permit boundary if it is determined that the well is outside the waste footprint, is not impacted by landfill operations, can be demonstrated that well design and installation will prevent any cross-contamination from the waste management unit to the water well production zone and between any water bearing zones, and an approved sampling plan to include frequency and parameters is in place.

The Orr water well was found adjacent to the existing utility easement at the approximate center of the landfill site. Based on the well schedule data obtained from the TCEQ, the well was abandoned on September 4, 1956, and reported destroyed by the owner in March 1974, see Part I/II, Appendix I/II.A – Maps & Photographs for relevant documentation.

There are no known crude oil or natural gas wells within the permitted site boundary. If any such wells are discovered during the development or facility operations, the TCEQ will be notified in writing, to include the location of the well, within thirty days in accordance with 30 TAC §330.161(b). Wells that are not authorized in accordance with 30 TAC §330.161 will be capped, plugged, and closed in accordance with all applicable rules.

To comply with 30 TAC §330.161(c), wells of other types, such as gas and groundwater monitoring wells that are under the jurisdiction of the TCEQ and are taken out of service, will be capped, plugged, and closed in accordance with all applicable rules.

The TCEQ will be notified of any well discoveries within thirty days of discovery. Well plugging reports will be submitted to appropriate agencies and a copy of each well plugging report will be submitted to the TCEQ within 30 days of plugging the well.

In the event that an abandoned well causes a change to the liner installation plan, a permit modification will be submitted to the executive director in accordance with 30 TAC §330.161(d).

IV.21.0 Compaction [30 TAC §330.163]

Solid waste brought into the active cell will be placed as follows:

- Waste will be unloaded and placed at the top or toe of the working surface,
- Waste will be spread into a thin layer, approximately three feet in depth, and
- Waste will be compacted by the landfill equipment or by running a tractor over the waste layer three to five times until the anticipated waste density is achieved.

IV.22.0 Landfill Cover [30 TAC §330.165]

IV.22.1 Daily Cover [30 TAC §330.165(a)]

Facility personnel will apply six inches of well-compacted earthen material not previously mixed with garbage, rubbish, or other solid waste at the end of each operating day to control disease vectors, fires, odors, windblown litter or waste, and scavenging, unless a more frequent interval is required by the executive director to control disease vectors, fires, odors, windblown litter or waste, and scavenging.

IV.22.2 Intermediate Cover [30 TAC §330.165(c)]

Facility personnel will cover all areas that have received waste but will be inactive for longer than 180 days with intermediate or final cover. Intermediate cover will include six inches of suitable earthen material that is capable of sustaining native plant growth and will be seeded or sodded following its application in order to control erosion or will be a material approved by the executive director that will otherwise control erosion. This intermediate cover will not be less than 12 inches of suitable earthen material and will be graded to prevent ponding of water, and plant growth or other erosion control features will be maintained. Runoff from areas which have intact intermediate cover will not be considered as having come into contact with the working face or leachate for the purpose of 30 TAC §330.207.

IV.22.3 Alternative Material Daily Cover [30 TAC §330.165(d)]

IV.22.3.1 Description and Thickness of Material

Alternate daily cover (ADC) material (Posi-Shell or equivalent) is spray applied using a standard hydroseeding machine. The material consists of powdered clay (with adhesives and water conditioners), reinforcing fibers, and coloring. The material is mixed with water to form the base mixture. Once applied, the coating forms a blanket over the waste which ranges from approximately 1/16 to 1/2 inches thick.

IV.22.3.2 Effects on Vectors, Fires, Odors, and Windblown Litter

ADC will provide the same effective control from vectors, fires, odor, and windblown litter as daily cover soil.

- Vector Control: Application of ADC to the working face is an effective vector deterrent. The ADC forms a seal that isolates food sources and inhibits flies from laying additional larvae. ADC discourages other vectors such as rodents and birds.
- Fire Control: ADC is an effective fire control material. First, the coating effectively seals the waste from the atmosphere causing the interstitial gases to eventually become oxygen-depleted and less susceptible to ignition. Second, ADC is nonflammable. When an acetylene torch is applied directly to the ADC, ignition of the ADC or underlying waste does not occur. The ADC utilized passes the ASTM E1354 and D4982 tests for non-flammability.
- Odor Control: The alkaline ADC formulation has an inherent capability to suppress odors. By applying the material as a daily cover, typical landfill odors will be reduced by the calcium oxide (lime) content of the mixture. ADC applied to putrid waste will effectively suppress odors by sealing the outer face of the waste with an alkaline surface layer.

- Windblown Litter Control: ADC is effective for litter control. Due to the stucco-like consistency of the material, a shell is formed over the waste that prevents litter from being carried away by winds.

IV.22.3.3 Operational Methods Utilized for ADC Placement

The ADC will be mixed with water in a standard 1,500-gallon hydroseeding machine (or equivalent), which will be attached/towed by standard landfill heavy equipment. ADC will be sprayed using the hydroseeding machine and will be applied from two directions to eliminate spray shadow and ensure sufficient cover of the waste in all directions. ADC will not be used before or during a heavy rainstorm.

IV.22.3.4 Landfill Closure Greater than 24 Hours

ADC shall not be used when the landfill is closed for a period greater than 24 hours.

IV.22.4 Final Cover [30 TAC §330.165(f)]

The facility will install final cover for the landfill in accordance with Part III, Appendix III.I – Closure Plan and 30 TAC Chapter 330, Subchapter K.

IV.22.5 Erosion of Cover [30 TAC §330.165(g)]

Erosion of final or intermediate cover will be repaired within five days of detection by restoring the cover material, grading, compacting, and seeding unless the commission's regional office approves otherwise, based on the extent of the damage requiring more time to repair or if the repairs are delayed because of weather conditions. An eroded area is considered to be deep enough to jeopardize the final or intermediate cover if it exceeds four inches in depth as measure from the vertical plane from the erosion features and the 90-degree intersection of this plane with the horizontal slop face or surface. The date of detection of erosion and date of completion of repairs, including reasons for any delays, will be documented in the cover inspection record required under 30 TAC §330.165(h). Refer to **Table IV.3-3** for inspection frequencies and other occasions for conducting inspections of intermediate and final cover. The periodic inspections and restorations are required during the entire operational life and for the post-closure maintenance period.

IV.22.6 Cover Inspection Record [30 TAC §330.165(h)]

The facility will keep a cover application record on-site readily available for inspection by commission representatives and authorized agents or employees of local governments having jurisdiction. This record will specify the date cover (no exposed waste) was accomplished, how it was accomplished, and the last area covered. This applies to daily, intermediate, and ADC. For final cover, this record will 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. The cover inspection record will document inspections required under **Section IV.22.5**, the findings, and corrective action taken when necessary.

IV.23.0 Ponded Water [30 TAC §330.167]

Proper cover and grades will be constructed and maintained over waste-filled areas so that ponded water is precluded on daily, intermediate, and final cover. The Closure Plan (Part III, Appendix III.I) and Post Closure Plan (Part III – Appendix III.K) describe the requirements for maintaining cover to eliminate ponding. Ponded water that occurs over waste filled areas will be removed quickly and the affected area will be regraded within seven days of occurrence of ponding.

Water that ponds in excavated areas and does not come into contact with waste, contaminated water, or contaminated soil will be allowed to evaporate or managed in accordance with applicable rules. Water that has contacted waste, contaminated water, or contaminated soil will be disposed of in the same manner as leachate. Contaminated water will not be discharged without specific written authorization from the TCEQ.

The owner/operator will manage the working face in a manner that reduces the potential for water collecting and ponding through grading and through the construction or erection of water diversion features such as berms. Water that may pond at the working face and that has come in contact with waste or leachate or is otherwise considered to be contaminated stormwater will be removed and disposed of properly. Non-contaminated stormwater will be directed to approved stormwater retention ponds at the facility.

Following major rain events, the owner/operator will assess the site to identify areas of potential or actual ponding. Corrective work will be performed as required by this SOP.

During extremely wet conditions, disposal activities will be limited to the wet weather area. Within seven days of extended wet weather conditions, the owner/operator will assess the site to determine where ponding has occurred and take corrective action as required by this SOP.

Site assessment events, discoveries of ponding, and corrective actions will be documented. Documentation will be kept in the Site Operating Record.

IV.24.0 Disposal of Special Wastes [30 TAC §330.171]

In accordance with 30 TAC §330.171(b), the acceptance and/or disposal of a special waste as defined in 30 TAC §330.3 will be allowed in accordance with the applicable requirements of the TCEQ at the time of disposal. The acceptance and/or disposal of special waste not identified in 30 TAC §330.171(c)-(d) require prior written approval from the executive director. In accordance with 30 TAC §330.171(b)(1), approvals will be waste specific and/or site specific and will be granted only if appropriate for the facility, and if the facility is in compliance with 30 TAC §330.171.

Per 30 TAC §330.171(b)(2), requests for approval to accept special wastes will be submitted by the generator to the executive director or to a facility with an approved plan. Requests for approval to accept special wastes will include a description of chemical and physical characteristics of waste and a statement as to whether or not each 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. All requests for approval to accept special wastes will include an operational plan containing the proposed procedures for handling each waste and listing required protective equipment for operating personnel and on-site emergency equipment, and a contingency plan outlining responsibility for containment and cleanup of any accidental spills occurring during the delivery and/or disposal operations.

This facility will not accept soils contaminated by petroleum products, crude oils, or chemicals in concentrations of greater than 1,500 milligram per kilogram (mg/kg) total petroleum hydrocarbons or contaminated by constituents of concern that exceed the concentrations listed in Table 1, Constituents of Concern and Their Maximum Leachable Concentrations in 30 TAC §335.521(a)(1) (relating to Appendices), per 30 TAC §330.171(b)(4).

Per 30 TAC §33.171(b)(5), the executive director may authorize the receipt of special waste with a written concurrence from the facility, however the facility operator is not required to accept the waste.

In accordance with 30 TAC §330.171(b)(6), the executive director may revoke an authorization to accept special waste if the owner or operator does not maintain compliance with the rules or conditions imposed in the authorization to accept special waste.

Special waste listed under 330.171(c) will be accepted and managed per the handling procedures for each waste identified in 330.171(c)(1-7).

The facility will accept dead animals or slaughterhouse wastes that are delivered to the facility independent of other wastes. Dead animals or slaughterhouse wastes that are received in this manner will be covered with a minimum of three feet of solid waste or a minimum of two feet of soil immediately upon receipt in accordance with 30 TAC §330.171(c)(2). Dead animals that are delivered co-mingled with other waste will be separated if feasible and covered as described. If dead animals are not separated from co-mingled waste, the co-mingled waste will be covered with three feet of solid waste or two feet of soil.

Special waste from healthcare related facilities which have been treated in accordance with 30 TAC §326 will be accepted for disposal at this site. Special wastes from healthcare related facilities that have not been treated in accordance with 30 TAC §326 will not be accepted unless authorized in writing by the TCEQ per 30 TAC §330.171(c)(1).

Regulated asbestos containing material (RACM) as defined by 40 CFR 61 will not be accepted by this facility, per 30 TAC §330.171(c)(3).

Non-regulated asbestos containing material will be accepted at this facility. Consistent with 30 TAC §330.171(c)(4), non-regulated asbestos containing material will be immediately covered with three feet of solid waste or two feet of soil.

Used oil filters from internal combustion engines will not be intentionally and knowingly accepted for disposal except as provided in 30 TAC §330.171(d)(1) and (2).

Other special wastes as approved by the TCEQ in response to a “Request for Authorization to Dispose of Special Waste” will be accepted by the facility on a case-by-case basis. Unless authorized otherwise, the waste will be immediately covered with three feet of waste or two feet of soil.

Special wastes other than those described in this SOP require specific written authorization by the TCEQ prior to acceptance at the facility.

All special wastes received at the facility will be properly documented in the Site Operating Record.

IV.25.0 Disposal of Industrial Wastes [30 TAC §330.173]

The facility will not accept Class 1 industrial solid waste. In compliance with 30 TAC §330.173(i), the facility may accept Class 2 industrial solid waste for disposal, provided the acceptance of this waste does not interfere with facility operation and its acceptance is in accordance with any applicable limitations in 30 TAC §330.5(a)(2) and the waste acceptance plan required by 30 TAC §330.61(b).

In accordance with 30 TAC §330.173(j), the facility may accept Class 3 industrial solid waste for disposal, provided the acceptance of this waste does not interfere with facility operation.

IV.26.0 Visual Screening of Deposited Waste [30 TAC §330.175]

Visual screening of deposited waste is not required at this facility. The facility will visually screen any deposited waste materials where the executive director determines that screening is necessary or where revised permit or design requirements so dictate.

IV.27.0 Leachate and Gas Condensate Recirculation [30 TAC §§330.177, 330.65(c)]

This facility is not authorized to recirculate leachate or gas condensate into a landfill unit at this site.

IV.28.0 Severe Weather Plan

IV.28.1 Plan Purpose

The purpose of this plan is to guide facility personnel as to the proper severe weather preparation or closure procedure of the facility during severe weather conditions. It is important that severe weather conditions be assessed scrupulously in order to ensure the safety of customers and landfill personnel.

IV.28.2 Steps for Landfill Closure

During periods of severe weather conditions, the Landfill Manager or Designee is responsible for assessing the severity of the conditions at the facility. Weather that can result in closure of the facility includes, but is not limited to, heavy rainfall, heavy snow or ice, and blowing dust. The Landfill Manager or Designee will assess the weather conditions at the active cell and at any location accessible to customers and employees. The facility must be checked for any conditions that pose a safety hazard to customers and employees. These conditions include, but are not limited to, hazardous road conditions such as muddy or slick roadways, and reduced and/or zero visibility due to blowing dust or snow conditions.

After a weather assessment has been completed, the Landfill Manager or Designee will make one of two decisions:

- The first decision will be the option to attempt a preparation of all access roads and accessible areas to both the public and landfill personnel. All areas of the facility must be deemed safe. Postponement of the scheduled opening and/or the temporary closing of the facility may be necessary to prepare the facility.
- The second decision will be to close the facility. Once the conditions are considered dangerous, the Director of the department must be notified in order to approve the closure.

If it is decided to close the facility, the Landfill Manager or Designee will instruct a qualified landfill attendant to close the entry gates. The landfill attendant will supervise the gates until all customers have been assisted out of the facility.

The landfill will then be closed, utilizing only the SOP guidelines that do not pose a safety threat to employees due to the existing severe weather conditions.