Part IV Application for Municipal Solid Waste Facility: Site Operating Plan

WST Landfill

Reeves County, Texas

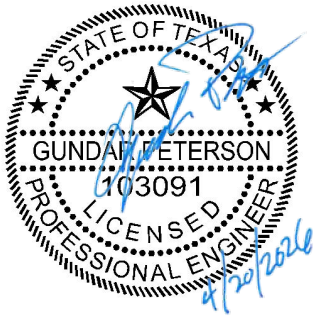
Prepared for

Operator: West Sun Tex, LLC
Application No.: 2431
Revision: 1

Prepared by

DBS&A
a Geo-Logic Company

Texas Registered Engineering Firm F-286
Texas Registered Geoscience Firm No. 50045
12303 Technology Boulevard, Suite 930D
Austin, Texas 78727
www.dbstephens.com
DB20.1166



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List of Acronyms and Abbreviations

ADC	alternative daily cover
CCS	citizens' collection station
CESQG	conditionally exempt small quantity generator
CFC	chlorinated fluorocarbon
CFR	Code of Federal Regulations
CR	County Road
DOT	Department of Transportation
EPA	U.S. Environmental Protection Agency
GLER	geomembrane liner evaluation report
LCWP	leachate and contaminated water plan
MBTA	Migratory Bird Treaty Act
mph	miles per hour
msl	above mean sea level
MSW	municipal solid waste
NOI	notice of intent
PCBs	polychlorinated biphenyls
PCS	petroleum-contaminated soil
POTW	publicly owned treatment works
PPE	personal protective equipment
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
ROW	right-of-way
RRC	Railroad Commission of Texas
SLER	soil liner evaluation report
SOP	Site Operating Plan
SOR	site operating record
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
TPWD	Texas Parks and Wildlife Department
TPDES	Texas Pollutant Discharge Elimination System
TPH	total petroleum hydrocarbons
USFWS	U.S. Fish and Wildlife Service
VSQG	very small quantity generator
WST	West Sun Tex, LLC

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1. Introduction [30 TAC 330.65 and 330.121]

1.1 General

This site operating plan (SOP) has been prepared for WST Landfill, a municipal solid waste facility owned and operated by West Sun Tex, LLC (WST) in Reeves County, Texas. This plan is included as Part IV of WST's Type I municipal solid waste (MSW) permit on-file with the Texas Commission on Environmental Quality (TCEQ). This plan has been created to meet and/or exceed the TCEQ requirements as detailed in 30 TAC 330, and to ensure the protection of public health and safety. The outline of this plan generally follows 30 TAC 330 Subchapters D and E as applicable. Any deviation from the permit and incorporated plans or other related documents associated with the permit is a violation of 30 TAC 330.

This SOP, along with all other plans required by 30 TAC 330, shall become operational requirements and shall be considered a part of the site operating record (SOR) of the facility. This document, the permit, and the permit application will be kept on-site during the active life of the facility and through the post-closure care maintenance period. The SOR will be kept at the scale house at the entrance to the facility.

This SOP provides provisions for management and operating personnel regarding the operation of WST Landfill. This plan also provides guidelines for maintaining compliance with engineering designs and applicable regulatory requirements of TCEQ. Generally, this SOP contains descriptions of how the applicable items required in 30 TAC Chapter 330, Subchapter D (relating to Operational Standards for Municipal Solid Waste Landfill Facilities) and Subchapter E (relating to Operational Standards for Municipal Solid Storage and Processing Units Waste Landfill Facilities) shall be implemented.

The anticipated waste generation area for the WST Landfill includes areas within about 50 miles of the facility. This area generally includes portions of six adjacent counties—Culberson, Jeff Davis, Loving, Pecos, Reeves, and Ward. This is not regarded as a limiting parameter to the facility's permit and future areas that may use the facility will depend on many factors.

WST Landfill does not have an environmental management system such as that described in 30 TAC 90.

1.2 Site Description

WST Landfill is located in north-central Reeves County at the intersection of County Road (CR) 4087 and CR 415, in Section 46, Block 4, H. & G.N. RR Co. Survey. The facility is in an area with flat topography that slopes gently to the east and is dominated by desert scrub and grass vegetation.

In April 2016, WST obtained a permit to receive, store, handle, and treat certain non-hazardous oil and gas wastes from the Railroad Commission of Texas (RRC) on a 440-acre parcel of land that currently includes the footprint of the MSW landfill. This oil and gas waste facility, called the Reeves County Commercial Disposal and Reclamation Facility, will be reduced in footprint and replaced in part by WST Landfill once permitted by TCEQ. Land use in the vicinity of the site is for agriculture and oil and gas development, rural residences, and undeveloped land. The WST property has been used for agricultural production in the past, but has been out of cultivation for over 20 years.

1.3 Waste Management Units

Waste management units to be used at the WST Landfill include the following:

- Type 1 MSW landfill that accepts Class 1, 2, or 3 non-hazardous industrial waste.
- Citizens' collection station (CCS) located near the facility entrance and scale house to reduce traffic within the landfill and at the working face.
- A storage area for large items, white goods, and whole tires.
- A leachate, contaminated water, and gas condensate storage facility consisting of storage tanks and/or evaporation pond.

As required by 30 TAC 330.65(c), the recirculation of leachate and gas condensate will not be performed at WST Landfill and no related provisions have been included.

1.4 Texas Pollutant Discharge Elimination System

WST Landfill will obtain coverage under the Texas Pollutant Discharge Elimination System (TPDES) if needed. WST will file a Notice of Intent (NOI) for coverage under General Permit TXR 050000 when appropriate. WST may arrange for transportation and disposal of any contaminated liquid to a publicly owned treatment works (POTW) provided that the wastewater meets the POTW requirements. Local pretreatment or discharge authorizations may be required

from the POTW facilities that accept these materials, and these authorizations will be obtained prior to initiating that method of disposal. Copies of such authorizations will be kept in the SOR.

2. Pre-Operation Notice [30 TAC 330.123]

For each subsequent disposal area constructed at WST Landfill after the initial site construction described in Attachment III-2, the facility shall provide written notice to TCEQ in the form of a geomembrane liner evaluation report (GLER) and/or soil liner evaluation report (SLER) concerning the construction and lining as required by 30 TAC 330.341. WST will allow 14 days for TCEQ to review the report and provide a verbal or written response prior to the placement of waste, as required by 30 TAC 330.123. If, by the end of the fourteenth day following TCEQ's receipt of the report, no comments are received, WST may begin placing waste.

3. Recordkeeping and Reporting [30 TAC 330.125]

WST will maintain a compilation of site documents, including the permit, the approved site development plan, this SOP, the final closure and post-closure maintenance plans, the landfill gas management plan, and any other plans required by permit, along with all issued modifications and any temporary authorizations granted. Files of inspections, monitoring results, activity logs, and notifications sent to regulatory authorities, documents associated with special waste and prohibited waste, quarterly and annual waste acceptance rates, copies of correspondence and responses related to facility operation, and copies of staff training requirements and certification of current completion will also be maintained.

If the annual waste acceptance rate exceeds the rate estimated in the landfill permit application and the waste increase is not due to a temporary occurrence, an application to modify the permit application will be filed, including the revised estimated waste acceptance rate, in accordance with 30 TAC 305.70(k). The application will be filed within 90 days of the exceedance, as established by the sum of the previous four quarterly waste acceptance rate summary reports.

See Table IV-1 for a listing of records to be organized and maintained at the facility as part of the SOR.

Table IV-1. Recordkeeping Requirements

Requirement	Regulation(s)
All location restriction demonstrations	30 TAC 330.125(b)(1)
Inspection records, training procedures, and notification procedures related to excluding prohibited waste	30 TAC 330.125(b)(2)
Results from gas monitoring and any remediation plans relating to explosive and other gases	30 TAC 330.125(b)(3), 330.371(c)
Design documentation for the placement of leachate or gas condensate in a landfill – Not applicable for WST Landfill	30 TAC 330.125(b)(4)
Demonstrations, certifications, findings, monitoring, testing, and analytical data relating to groundwater monitoring and corrective or remedial action	30 TAC 330.125(b)(5)
Closure and post-closure care plans and any monitoring, testing, or analytical data relating to post-closure requirements	30 TAC 330.125(b)(6)
Cost estimates and financial assurance documentation relating to closure and post-closure	30 TAC 330.125(b)(7)
Small Community exemption demonstration - Not applicable for WST Landfill	30 TAC 330.125(b)(8)
Correspondence and responses relating to the operation of the facility, modifications to the permit, approvals, and other matters pertaining to technical assistance	30 TAC 330.125(b)(9)
Documents, manifests, shipping documents, trip tickets, etc., involving special waste	30 TAC 330.125(b)(10), 330.219(b)(6)
Records of the application rate and total amount ADC applied to the working face on those days in which ADC is applied	30 TAC 330.125(b)(11)
Any other documents required by the permit or the TCEQ	30 TAC 330.125(b)(12)
Documents related to the annual waste acceptance rate, including quarterly and annual solid waste summary reports	30 TAC 330.125(h)
A record of any operating hours used outside of the standard hours	30 TAC 330.135(d)
A record of unauthorized waste removal from the landfill	30 TAC 330.133(b)
Cover application record	30 TAC 330.165(h)
Inspection of daily cover	30 TAC 330.165(h)
Inspection of intermediate cover	30 TAC 330.165(h)
Inspection of final cover	30 TAC 330.165(h)
Access control inspections (ex. perimeter fences, berms, and gates)	30 TAC 330.131
Personal training requirements and records and operating licenses	30 TAC 335.586(d)-(e), 125(e) (f)
Record of any incident which requires implementing a contingency plan	30 TAC 335.589(f)(11)

Operating personnel will also use log books and schedules to document compliance. The following information will also be kept, maintained, and filed as part of the SOR:

- Access control inspection.
- Windblown waste and litter control operations
- Management and disposal of large items and whole tires
- Dust control efforts

The SOR will be maintained at the entrance scale house for the facility, which is located prior to entering the MSW facility boundary but on property owned by WST. Records will be maintained for the life of the facility and any post-closure care period.

The SOR will be updated within seven working days of completing an event or receiving analytical data. All information contained in the SOR will be furnished upon request to TCEQ and will be made available at all reasonable times for inspection.

Employee training will be provided to all personnel within 6 months of hiring or assignment to a position that requires training. Training refreshers shall be conducted on an annual basis per 30 TAC 335.586. This SOP shall be available for review by employees involved in the daily operations of the facility and to other parties and regulatory agencies as requested. Documentation of training will be kept in the SOR along with any operator licenses issued in accordance with Chapter 30, Subchapter F of this title (relating to Municipal Solid Waste Facility Supervisors).

If modifications to the operational procedures described in this SOP become necessary, regulatory requirements will be assessed to verify that new or modified procedures satisfy compliance criteria. If necessary, a modification to the site permit will be requested.

Per 30 TAC 330.673 and 330.675, WST will maintain records of waste acceptance and will prepare quarterly and annual solid waste summary reports and place them in the facility's SOR. These reports will be completed using forms provided by TCEQ. A copy of the quarterly fee report will be submitted to TCEQ as required under 30 TAC 330.675.

The amount of waste received will be reported in tons. In the unlikely event that the received waste is not weighed on scales (e.g., if the scale being temporarily out-of-service), the following will be considered. Conversion factors to be used for waste transport vehicles relative to waste volume and weight in vehicles shall be as follows unless site-specific data are documented for use:

- 1 cubic yard = 400 pounds (no compaction)
- 1 cubic yard = 667 pounds (medium compaction)
- 1 cubic yard = 800 pounds (heavy compaction)

For industrial waste (non-hazardous), a reasonable conversion factor will be used based on site-specific data developed by WST.

4. Site Operating Plan [30 TAC 330.127]

In general, WST Landfill will be operated according to this SOP, the site development plan, the final closure plan, the post-closure care plan, the landfill gas management plan, the groundwater sampling and analysis plan, and any other required plan or other related document. WST will not conduct operations at the landfill contrary to any of the permit documents without revision and prior approval from TCEQ or knowingly in violation of any relevant regulation.

The SOP and other permit documents will be retained during the active life of the facility and throughout the post-closure care period. The following subsections provide additional details of the WST Landfill operating requirements as required by 30 TAC 330.127(3).

4.1 Personnel [30 TAC 330.127(1)]

Landfill management determines the staffing and training needed to ensure that the operation of the landfill is efficient and compliant. Landfill personnel may include, but are not limited to, General Manager, Site Operations Manager, Equipment Operators, Mechanics, Cashiers/ Customer Service Representatives, laborers, and special waste, environmental, and compliance support personnel. Personnel training records are maintained as part of the SOR. An organizational chart is provided as Figure IV-1.

4.1.1 Functions and Minimum Qualifications of Key Personnel

4.1.1.1 General Manager

4.1.1.1.1 Functions

The General Manager shall be a Class A licensed facility supervisor per 30 TAC Chapter 30, Subchapter F. The General Manager is responsible for daily operations at WST Landfill and verifies that it is operating in accordance with the SOP and TCEQ regulations. They will ensure its successful financial operation, compliance with TCEQ requirements, fulfillment of payroll, and

retainment of adequate staffing. In addition, the General Manager shall serve as the emergency coordinator during emergencies, contingencies, or regulatory issues with governing agencies. They will also monitor facility operations and personnel and identify any threats to public safety or the environment. If not on the site, the General Manager shall delegate responsibilities (typically to the Site Operations Manager).

4.1.1.1.2 Qualifications

The General Manager shall have familiarity with TCEQ regulations and landfill equipment and possess a Class A MSW Operator license.

4.1.1.2 Site Operations Manager

4.1.1.2.1 Functions

The Site Operations Manager shall generally be responsible for all activities on the working face and other tasks as assigned by the General Manager. They shall ensure that all personnel are properly trained and operate in accordance with this SOP and applicable TCEQ requirements. The Site Operations Manager shall continually monitor for any threats to public safety or the environment and supervise Equipment Operators. They shall be capable of assuming the responsibilities of the General Manager or Equipment Operators when needed.

4.1.1.2.2 Qualifications

The Site Operations Manager shall have familiarity with TCEQ regulations and landfill equipment and possess a Class A MSW Operator license. They shall maintain current training in landfill operations.

4.1.1.3 Equipment Operators

4.1.1.3.1 Functions

Equipment Operators shall operate on-site machinery and ensure waste compaction, placement of cover, emergency response, and facility maintenance while monitoring for any threats to public safety or the environment. Equipment Operators shall visually inspect loads as they are deposited for prohibited and hazardous wastes to ensure compliance with the waste acceptance rules outlined in this SOP. They shall be adequately trained to detect such wastes. Equipment Operators shall also perform facility maintenance activities as assigned by the General Manager and/or Site Operations Manager.

4.1.1.3.2 Qualifications

Equipment Operators shall have at least one year of experience with operating machinery relevant to landfill activities, shall maintain current training in landfill operations, and shall demonstrate proficiency in the operation of all on-site equipment.

4.1.1.4 Mechanics

4.1.1.4.1 Functions

Mechanics will maintain and repair on-site equipment. Responsibilities may overlap with those of Equipment Operators. Mechanic duties may be provided by an outside company.

4.1.1.4.2 Qualifications

Mechanics will maintain current training in landfill operations and be proficient in the repair, maintenance, and operation of all on-site equipment.

4.1.1.5 Cashiers/Customer Service Representatives

4.1.1.5.1 Functions

At least one Cashier/Customer Service Representative will be stationed at the scale house during landfill operating hours. They will be responsible for recording the weight of arriving loads, assessing fees, and collecting payments. They will also oversee customer service interactions, explain landfill policies and procedures to the public, screen for prohibited and hazardous wastes and be trained in the detection of such wastes, direct incoming vehicles to the working face, and monitor for threats to public safety or the environment.

4.1.1.5.2 Qualifications

Cashiers/Customer Service Representatives will undergo mandatory WST Landfill training.

4.1.2 Landfill Staffing

During operating hours, sufficient staff will be present on-site to implement all aspects of the SOP and applicable TCEQ requirements. Minimum staff on-site will be two people—a cashier and a Site Operator/equipment operator—but additional personnel may be assigned to implement landfill operations at the discretion of the General Manager.

4.2 Equipment [30 TAC 330.127(2)]

The types of equipment that will typically be available at WST Landfill are listed in Table IV-2. The minimum number of each type of equipment may vary with the waste acceptance rate; however, the anticipated initial waste acceptance rate of 61,100 tons per year is well below the

equipment's capacity. If the actual waste acceptance rate exceeds this rate, the equipment list will be reevaluated and updated as necessary. Additional or different units of equipment may be provided as necessary to enhance operational efficiency.

Table IV-2. List of Equipment and Uses for Landfill Operations

Equipment Type	Number (Minimum)	Minimum Size	Function
Dozer - track type	1	Caterpillar D8 or equivalent	Spreading and compacting waste and cover, excavating cover material, rough grading of cover, and road and ditch maintenance.
Compactor	1	Caterpillar 826 or equivalent	Spreading and compacting waste and cover soil and miscellaneous soil compaction.
Water Truck	1	1,000 gallons or larger	Dust control, firefighting support, and moisture conditioning soil to facilitate compaction.
Off road Truck	See note	Caterpillar 750 or equivalent	Hauling cover soil and site maintenance
Wheel Tractor–Scraper	See note	Caterpillar 623 or equivalent	Excavating and hauling cover material and miscellaneous soil borrow
Excavator	See note	Caterpillar 330 B or equivalent	Soil excavation, loading trucks, and drainage maintenance.

Note: The landfill operations will require either a wheel tractor–scraper or an excavator and truck for cover soil operations.

Should there be longer periods of equipment breakdown or extended maintenance required, temporary backup equipment may be needed. It will be obtained from rental agencies in the region if the waste acceptance rate cannot be accommodated by the site's existing serviceable equipment.

4.3 General Operating Requirements [30 TAC 330.127(3)]

Table IV-3 outlines general requirements for site inspection and maintenance at WST Landfill. The items in the list will be completed using on-site labor and equipment. Documentation of the inspection and maintenance will be kept in the SOR.

Any item that is determined to need attention will be presented to the General Manager or Site Operations Manager for appropriate action. Records of inspections will be maintained in the SOR. The landfill will maintain inspection logs that include the date and time of inspection, inspector's name, observations made, and the date and nature of repairs.

Table IV-3. Site Inspection and Maintenance Activities

Item	Task	Frequency
Fence/gates	Inspect any perimeter fence and gates for damage. Make repairs if necessary.	Weekly
Site signs	Inspect all site signs for damage, color coding, general location, and accuracy of posted information. Correct or replace damaged markers within 15 days of discovery.	Monthly
Windblown waste	Inspect the working face area, any wind fences, all access roads, entrance area, storage areas and perimeter fence(s) for fugitive trash. Clean up the items as necessary and return waste to the working face.	Daily when the site is accepting waste
Waste spilled on route(s) to site	On days the facility accepts waste, inspect entrance areas and all roads used to access the facility at least 2 miles from the site entrances for waste spilled along and within the right-of-way. Clean up as necessary and return waste to the working face.	Daily when the site is accepting waste
Working Face(s)	Waste disposal area size is minimized, the lifts sufficiently compacted and other appropriate waste handling procedures are followed. Run-on/runoff controls prevent water from entering or leaving the working area.	Daily when the site is accepting waste
Landfill markers	Inspect landfill markers for damage, color-coding, and general location. Correct or replace any markers needed within 15 days of any determination.	Monthly
Site access road	Inspect site access road(s) for damage (i.e. vehicle traffic, erosion, excess mud accumulation). Maintain for safe and efficient access, including dust control as needed.	Daily when the site is accepting waste
Dust control	Spray haul roads with water to control and reduce particulate matter emissions	Daily (during dry weather)
Ponds and drainage channels	Inspect on-site drainage channels and ponds. Maintain/repair as needed for proper function.	Monthly and within 72 hours of rainfall of 0.5 inch or more in 24 hours
Odor control	Inspect site for potential odors at property line. If present, determine source and possible remedy.	Daily when the site is accepting waste
Daily cover	Inspect cover for proper placement, thickness, and compaction. If ADC used, document application rate and coverage.	Daily - Class 1 and MSW areas
Fire Control Stockpile	Inspect working face area for sufficient soil stockpile for covering in the event of a fire at each working face	Daily when facility is in operation

Item	Task	Frequency
Intermediate cover	Inspect cover for proper placement and thickness, erosion, compaction, exposed waste, or other contamination.	Monthly and within 72 hours of rainfall of 0.5 inch or more in 24 hours
Final cover	Inspect for proper placement, thickness, compaction, slope, settlement, erosion and exposed waste, or other contamination. Inspection and maintenance will continue throughout the post-closure care period.	Semiannual and within 72 hours of rainfall of 0.5 inch or more in 24 hours
Ponded water	Inspect site for ponded water over waste. Fill or drain areas as needed.	Monthly and within 72 hours of rainfall event 0.5 inch or more
Disease Vector Control	Inspect landfill facility for insects and rodent populations and use appropriate control measures where needed.	Monthly
Leachate	Measure depth of leachate in sump(s) and observe for outbreaks in above grade fill areas. Verify that pumps and measuring equipment are working properly.	Quarterly
Gas collection and control system	Inspect and verify system is properly operated and maintained.	Monthly when system is active

4.4 Personnel Training [30 TAC 330.127(4)]

WST Landfill will follow all applicable training requirements as specified under 30 TAC 335.586 and 30 TAC 330. Facility personnel will successfully complete a program of classroom instruction and/or on-the-job training as provided by WST. The training will specify how to perform the job duties, the applicable requirements of the TCEQ, any site-specific health and safety plan, and all other applicable rules. The General Manager or Site Operations Manager will verify that this instruction program adequately covers the job's description. All instructions will be directed by a person trained in proper waste management procedures, and will include instructions on waste management procedures (including contingency plan implementation) relevant to the individual positions.

Landfill personnel will be trained on the following operational, contingency, and emergency procedures within six months after the date of their employment, assignment to the landfill or to a new position. No employee will work in an unsupervised position until they have completed the training requirements. All employees will maintain current training in landfill operations and will have refreshers of their initial training at least once per year. Training requirements will be reviewed by the General Manager or Site Operations Manager during this refresher to verify that

the program continues to be adequate for the position. All records of employee training will be retained in the SOR.

4.4.1.1 *Emergency Procedures*

Appropriate personnel will be trained on emergency procedures for the following events, which are further detailed in the contingency plan (Attachment IV-1):

- Response to fires and/or explosions at the landfill
- Release of toxic/hazardous materials
- Communications and alarm systems
- Using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- Response to groundwater contamination incidents
- Shutdown of landfill operations
- Personal protection and protective equipment (including respirator fit tests, if required)
- Spill response

4.4.1.2 *Operational Procedures*

Personnel will be trained in the following operational procedures where applicable to the position:

- Safety
- Accepted waste classifications
- Prohibited waste detection and management
- Random inspections
- Special waste disposal and potential health effects
- Unloading of waste
- Landfill cover requirements
- Methane gas properties and safety
- Litter control
- Disease vector control
- Equipment operation and maintenance
- Paperwork, manifesting, and notification requirements

Table IV-4 outlines the applicable training requirements by landfill position. These requirements may be updated or expanded as needed to meet ongoing operational requirements.

Table IV-4. Training Requirements by Job Position

Position	Facility Orientation	Operations	Endangered Species	Job-Specific Safety	Fire Prevention/Control	Waste Load Inspection	Random Inspections	Haz Waste Identification	Prohibited Wastes	SPCC	Emergency Response	TCEQ MSW License	Equipment	Litter Control	SWPPP
General Manager/Site Operations Manager	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Heavy Equipment Operators	X	X	X	X	X	X		X	X	X	X		X	X	
Mechanic	X			X	X					X	X				
Laborer	X	X		X	X									X	
Cashier/Customer Service Representative	X	X		X	X	X	X	X	X		X			X	

4.5 Prohibited Waste Detection and Prevention 330.127(5)

Landfill personnel that routinely perform waste disposal duties will be trained to recognize prohibited wastes. This training will be provided annually and the completion will be documented in the SOR. A sign will be posted prominently at the facility entrance warning against the disposal of prohibited waste. Waste delivered to the landfill will be observed by trained landfill staff for the presence of prohibited wastes.

If a landfill staff member observes prohibited waste prior to or during unloading, the load will be rejected and removed by the transporter or generator and the Waste Inspection Report (Attachment IV-2) will be completed. If the waste is suspected to be hazardous or containing polychlorinated biphenyls (PCBs), WST will notify TCEQ and any local pollution agency that has requested to be notified.

4.5.1 Prohibited Waste

Waste types that are prohibited and will not be accepted into the landfill include but are not limited to hazardous wastes, free liquids or waste containing a large quantity of free liquids, and

radioactive waste. A person that violates the provisions of this section may be subject to the criminal and/or civil penalties found in the Texas Health and Safety Code or other presiding jurisdictions. The following wastes are prohibited from disposal at the WST Landfill and will not be intentionally or knowingly accepted:

- Any waste not authorized for disposal, including those for which "No" has been indicated on the waste acceptance plan form.
- Untreated medical waste unless authorized in writing by the TCEQ to protect human health and the environment from the effects of a natural or manmade disaster [30 TAC 330.171(c)(1)].
- Lead-acid storage batteries [30 TAC 330.15(e)(1)].
- Used motor vehicle oil [30 TAC 330.15(e)(2)].
- Used oil filters from internal combustion engines except for used oil filters from households that have been processed as described in this SOP [30 TAC 330.15(e)(3)].
- Whole used or scrap tires unless processed in a manner acceptable to TCEQ [30 TAC 330.15(e)(4)].
- Refrigerators, freezers, air conditioners, and any other items containing chlorinated fluorocarbons (CFCs) that have not been handled in accordance with 40 CFR 82.156 [30 TAC 330.15(e)(5)].
- Bulk or non-containerized liquid waste unless the waste is household waste that has been tested in accordance with Test Method 9095 (Paint Filter Liquids Test) and is certified to contain no free liquids [30 TAC 330.15(e)(6)].
- Containers or drums holding liquid waste, unless (1) the container is similar in size to those found in household waste, (2) the container is designated to hold liquids for other than storage, or (3) the waste is household waste [30 TAC 330.15(e)(6)].
- Regulated hazardous waste [40 CFR 261.3] that was not generated by a Resource Conservation and Recovery Act (RCRA) conditionally exempt small quantity generator (CESQG) or a very small quantity generator (VSQG).
- PCB wastes [40 CFR 761], unless authorized by the U.S. Environmental Protection Agency (EPA) [30 TAC 330.15(e)(8)].

- Tanks, drums, or containers used for shipping or storing any material that has been listed as a hazardous constituent in 40 CFR 261, Appendix VIII but has not been listed as a commercial chemical product in 40 CFR 261.33(e) or (f).
- Radioactive materials, 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)].

4.5.2 Prohibited Waste Detection Measures

The following actions will be employed at WST Landfill to detect and prevent the disposal of prohibited waste:

- Inform customers of wastes prohibited at the site by posting signs at entrance.
- Provide customers with a written list of prohibited wastes.
- Inform the operators of transfer stations that deliver waste to facility of prohibited wastes.
- Personnel training activities.
- Random inspections of incoming loads as discussed below.
- Notification of TCEQ of any incident involving regulated hazardous or PCB wastes at landfill.
- Remediation of any regulated hazardous or PCB wastes discovered at the site.

In addition to training listed elsewhere, personnel involved in solid waste disposal will be trained to inspect vehicles entering the facility and in the identification of regulated hazardous, PCBs, and other prohibited wastes. Records of employee training regarding control procedures will be maintained in the facility SOR. Personnel will be trained to look for the following indications of possible prohibited waste:

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

If any incoming load is suspected of containing any prohibited waste, that load will be directed to an area out of the way of ongoing operations for further inspection as discussed below. If the waste load is determined to contain prohibited waste, the load will be rejected and directed back to the generator or transporter. Landfill personnel will be diligent in observing waste loads from potential sources of prohibited waste such as industrial facilities, electronic companies, metal-plating industries, automotive and vehicle repair service companies, and dry-cleaning establishments.

In addition to the inspection of loads suspected of containing prohibited waste, WST will conduct periodic load inspections. As described in this section, WST will note findings on an inspection form (Attachment IV-2). These forms will be kept in the SOR.

4.5.3 Random Inspection of Incoming Loads

At least 1 percent (1 out of every 100) of vehicles delivering waste to the facility will be chosen for a more comprehensive inspection. The cashier/customer service representative will identify loads to be inspected and inform the driver to proceed to the waste inspection area to determine if unacceptable wastes are present. A Waste Inspection Report (Attachment IV-2) will be completed and retained in the SOR.

4.5.4 Waste Inspection Procedures

Waste loads suspected of containing unauthorized waste material or that are chosen for a random inspection will be reviewed to determine the presence or absence of hazardous or prohibited wastes. The inspections will be conducted by landfill personnel who are trained and qualified to identify hazardous waste, asbestos-containing materials, PCBs, and other wastes not accepted at the landfill. All inspections will be conducted according to the following procedures:

- All personnel conducting waste inspections will receive training to identify unacceptable wastes.
- All personnel conducting waste inspections will receive training on safety equipment and personal protective equipment (PPE).
- The waste will be unloaded in a lined area near but not immediately next to the active face to prevent interference.
- The waste will be carefully spread for observation.

- Any container with contents not easily identifiable (unmarked drums, containers, bags) will be separated if a visual inspection determines that such movement will not cause the drum to rupture, and will be opened and inspected only by trained personnel.
- If the waste is determined to be acceptable, it shall be transferred to the working face for disposal.
- Known unacceptable waste detected during inspections or unloading will be immediately returned to the hauler. If the hauler is unavailable or has left the site, the waste will be safely stored until provisions for removal by the hauler and/or disposal at an authorized facility can be arranged.

The following information, at a minimum, will be recorded during each inspection:

- Date and time of inspection
- Name of employee(s) conducting the inspection
- Commercial hauler name and driver name
- Vehicle description, license plate number, vehicle number
- Pertinent observations made during inspection
- Any unauthorized materials detected
- Generator of unauthorized materials, if known
- Actions taken to manage, reject, and assure proper disposition of unauthorized materials

Wastes that are suspected of being unacceptable will be handled, stored, and isolated in a designated area and managed appropriately until a proper determination can be made through analysis. In the event that hazardous or PCB wastes are identified, landfill personnel will reject the loads and contact TCEQ, the hauler, the generator, and any local pollution agency with jurisdiction that wishes to be notified, within 24 hours (if unacceptable medical waste is identified, the local health department will be contacted). If wastes temporarily stored at the site are determined to be hazardous and the origin of the waste is unknown, the operator will immediately contact the Reeves County Emergency Management Agency, who will act as first responder for hazardous materials and will implement their emergency response plan. In addition, TCEQ will be contacted to provide guidance and instructions for removal and disposal of hazardous waste. All hazardous waste will be removed from the facility by a licensed transporter and disposed at a permitted treatment, storage, or disposal facility. WST Landfill will maintain certifications for licensed hazardous waste transporters that could be employed, and they will be made available for inspection by TCEQ.

5. Fire Protection Plan [30 TAC 330.129]

Fire protection procedures for WST Landfill are discussed in this section. Additional information is available in the Contingency Plan provided as Attachment IV-1. Fire prevention will be a main component of fire protection. The following activities are intended to prevent fires:

- Open burning is not allowed.
- Personnel will be alert for signs of burning waste such as smoke, steam, or heat being released from incoming loads.
- Smoking will not be allowed near active areas of the landfill and only in designated areas.
- Fuel spills will be contained and cleaned up immediately.
- All mobile equipment will be equipped with fire extinguishers.
- Equipment will be cleaned routinely.
- Daily cover will be placed over exposed waste.
- Vegetation will be maintained to prevent fires from starting or spreading.

Fire response training shall be provided to all landfill personnel as part of their initial and annual trainings, and firefighting equipment shall be readily available at all times.

5.1 General Rules for Fires

WST will meet with the local fire department in a pre-planning session to discuss fire prevention and standard operating procedures in the event of a fire. In case of a fire, the following guidelines will be followed:

- No one will attempt to manage (in case of controlled) or fight a fire alone.
- No attempt to manage or fight a fire will be made without adequate PPE or fire suppression equipment.
- All landfill equipment will be furnished with handheld fire extinguishers.
- All facility personnel will be alerted to the fire, and landfill customers will be removed from the vicinity of the fire.
- All landfill employees will be trained and familiar with on-site firefighting equipment and its limitations.

- If fire occurs at the working face, burning material will be either pushed away from the active area or fire breaks will be constructed to isolate the fire. If that is not possible due to safety or practicality, the working face will immediately be covered in earthen material.
- Any fire that is beyond safe control with the personnel and equipment on-site will necessitate a full evacuation of the facility.
- Any fire extinguished by staff will be thoroughly inspected to ensure that it is fully extinguished.
- Any fire that cannot be extinguished within 10 minutes of discovery will be reported to the TCEQ Regional office.

5.2 Landfill Fires

In addition to the general fire safety rules listed above, a supply of soil (detailed in Section 5.2.2) will be maintained to extinguish any fire at or near the working face. The soil stockpile or source will be of adequate amount to cover any waste received for disposal that is not already covered with 6 inches of earthen material. On-site equipment must be available and capable of covering the active disposal area with 6-inches of soil within one hour of fire detection.

If a fire occurs that is not extinguished within 10 minutes of detection, TCEQ's Midland regional office will be contacted within 4 hours by telephone and within 14 days in writing with a description of the fire and resulting response.

Landfill personnel will be prepared and equipped to provide immediate fire suppression in the event of a fire/explosion at the landfill. Should a fire occur, the General Manager, Site Operations Manager, or designee will:

- Notify any on-site personnel and the landfill office
- Make an assessment as to whether the landfill can expose and douse the fire using site equipment or if the fire department is required
- Use fire extinguishers (located on all landfill equipment/vehicles and in the gatehouse) or stockpiled soil to extinguish the fire
- Call 911 and contact the Reeves County Emergency Management Agency if fire lasts more than 10 minutes
- Restrict access to the critical area (evacuate, if necessary) until informed by the proper authorities that the threat has been eliminated

- Record a written account of the incident in the SOR including actions taken

5.2.1 Fires at the Citizens' Collection Station

Fire extinguishers will be the predominant method used for fighting any fires that arise at the CCS. Should the fire become too large to extinguish using handheld fire extinguishers, a water spray using a water hose or truck will be used. Where the fire is contained within a roll-off dumpster or other steel container, soil may also be used to smother the fire. Should burning waste be delivered to the station, it will be located away from other ignitable sources and immediately sprayed or covered with clean soil.

5.2.2 Demonstration of Adequate Fire Cover

The working face will, in general, be maintained at the smallest size possible and will not exceed a maximum area of 6,000 square feet (120 feet by 50 feet); however, it will often be smaller. To ensure that WST Landfill can sufficiently control and suppress a fire that may arise at the working face, a stockpile of soil shall be maintained at or near the working face that can be used to cover the open area to a depth of 6 inches. Table IV-5 details the soil amounts that WST Landfill shall maintain at or near the working face for adequate fire suppression. The stated volumetric figures include a safety factor of 1.2.

Table IV-5. Adequate Soil Volume for Fire Contingency at the Working Face

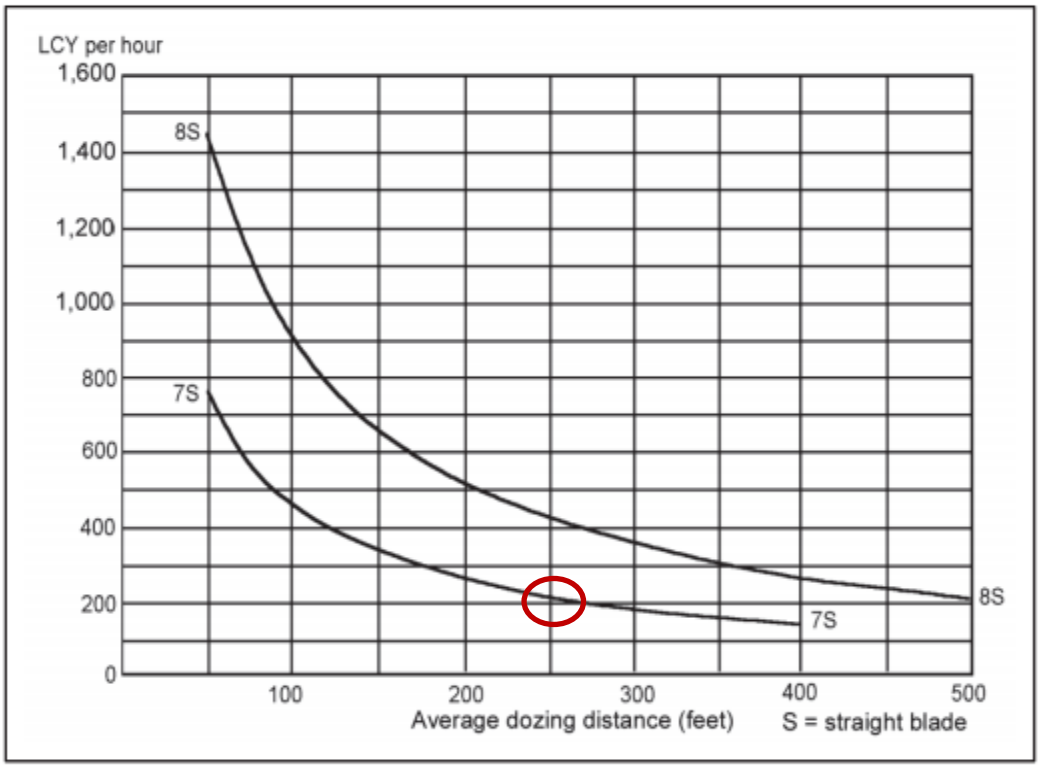
Size of Working Face (square feet)	Soil Volume Required	
	cubic feet	cubic yards
1,000	600	22
2,000	1,200	44
3,000	1,800	67
4,000	2,400	89
5,000	3,000	111
6,000	3,600	133

WST Landfill will maintain the following fire protection earth-moving equipment on-site:

- One crawler-dozer: Cat D7, D8, or equivalent
- One water truck: 1,000 to 4,000 gallons

The following graph shows the earth-moving capabilities of D7 and D8 Cat Crawler-dozers (reproduced from the U.S. Army Manual on Earthmoving Operations dated June 2012). The D7 dozer (the smaller of the two possible options on-site) is capable of moving over 200 loose cubic yards (LCY) of soil a distance of 250 feet in 1 hour. This is in excess of the amount required to cover the maximum size of the working face to a depth of 6 inches. This cover would be effective at suppressing any fires that may arise near the working face. Other on-site equipment, including the water truck, will assist in fighting fires.

A soil stockpile will be available at all active areas. If a separate disposal area is utilized for the disposal of Class 1 waste, a spoil stockpile will be provided when the area is active.



Source: U.S. Army Manual on Earthmoving Operations, June 2012

6. Access Control [30 TAC 330.131]

Public access to WST Landfill will be controlled by means of artificial barriers, such as berms, fences, stormwater conveyance channels, and gates or a combination thereof, appropriate to protect human health and safety and the environment. Uncontrolled access to the facility will

be prevented. Fences and gates are at strategic locations to allow authorized access where appropriate. All gates will be locked when not in use.

No trespassing signs will be placed around the perimeter of the facility. Informational signs will be prominently displayed at the entrance with the hours of operation and emergency contact numbers. An attendant shall be on-site during operating hours and will lock all gates outside of standard operating hours or when not in use. The attendant and/or signs will direct incoming vehicles to the unloading area.

Access control features will be inspected monthly and maintained as needed. If a breach in the access control features is observed, the breach will be promptly repaired and the TCEQ notified according to Table IV-6.

Table IV-6. Access Control Breach Repair and Notification

Requirement	Access Breach (repaired within 8 hours)	Access Breach (not repaired in 8 hours)
Notify TCEQ 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 TCEQ
Notify TCEQ Region Office when permanent repair completed	Not required	Within schedule submitted to TCEQ

6.1 Boundary Posts/Fencing

The landfill operator shall ensure that boundary posts remain clearly visible and that fences and berms surrounding the facility and its operations are maintained in clean and functional condition in accordance with 30 TAC 330.131. The boundary fence or berm at the entrance to the facility will be inspected daily for any sign of breaches or disrepair. TCEQ's regional office and any local pollution agency with jurisdiction which has requested to be notified will be informed of any breaches and needed repairs within 24 hours of detection, unless the area can be permanently repaired within 8 hours. Temporary repairs will be made within 24 hours and permanent repairs shall be executed as soon as reasonably possible. Any active breach will be continuously monitored until sealed.

7. Unloading of Waste [30 TAC 330.133]

Unloading of waste at WST Landfill may occur at three potential locations. These include an MSW active area, a Class 1 waste area, and the CCS. Class 1 waste may be deposited with the MSW or a separate area may be provided. Active working areas will be confined to as small an area as practical. This helps to increases compaction, requires the use of less cover material and helps to prevent blowing or fugitive litter. WST Landfill is not required to accept any solid waste that may cause problems in maintaining full and continuous compliance with this SOP.

7.1 MSW or Class 1 Active Areas

Waste haulers are directed to the appropriate landfill working area (tipping face) or CCS to unload.

The unloading of waste in unauthorized areas of the landfill is prohibited. Any waste deposited in an unauthorized area will be removed immediately and disposed of properly. At any given time, there may be two authorized and active locations of unloading (MSW and Class 1). At least one trained personnel shall be stationed at each location during all times of unloading. There shall be no unsupervised disposal of solid waste at WST Landfill. Trained landfill staff will strictly direct and monitor all unloading to ensure it is conducted appropriately. The staff involved with the unloading or inspection of waste will have the authority and responsibility to (1) reject unauthorized loads, (2) have unauthorized material removed by the transporter, (3) assess appropriate surcharges if deemed applicable, (4) have the unauthorized material removed by on-site personnel or otherwise properly managed by the facility or (5) have access to landfill staff with this authority. A record of unauthorized material removal shall be maintained in the SOR.

On average, the MSW working face will be confined to the smallest practical area, ranging from 2,000 to 6,000 square feet (dimensions 40 feet by 50 feet to 120 feet by 50 feet). The depth of the operational lift will range from 5 to 15 feet. A dedicated Class 1 disposal area will be much smaller (about 20 percent), about 400 to 1,200 square feet.

To prevent landfill equipment from damaging a landfill unit's liner system, the initial layer of waste shall be placed in a 5-foot-thick lift. The first 5-foot lift will consist of "soft" waste, primarily residential waste free of construction debris, large or bulky items, limbs, or any other material that may damage the composite liner system.

Any whole used or scrap tires that are found in the waste at the active working face area will be retrieved if it is safe to do so. Waste compactors may be able to push these to one side for later removal. Retrieved tires will be stored near the CCS until sufficient quantities accumulate to justify transportation to an authorized tire processor.

7.2 Special Requirements for Industrial Waste

Non-hazardous industrial waste may be placed above natural grade consistent with 30 TAC 330.179(b) if lateral containment dikes complying with 30 TAC 335.590(24) (F) (i)–(vi) are provided. Alternately, as provided in 30 TAC 335.590(24)(F)(vii), dikes are not required if a satisfactory demonstration that the standards of 30 TAC 335.590(24)(F)(i) can be met has been submitted to and approved by the TCEQ. As required in 30 TAC 335.588, wastes that are ignitable, reactive, or otherwise incompatible with other accepted wastes will be separated and protected from ignition sources or chemical reactions.

7.3 Citizens' Collection Station

A CCS shall be located near the entrance of WST Landfill for use by individuals or small haulers to dispose of solid waste. The CCS may consist of one or more storage containers, bins, or trailers that are compatible with the anticipated waste. Signage shall be posted at the CCS and will contain a listing of acceptable wastes and unloading instructions.

WST will transport the deposited waste to the working face of the landfill on a scheduled basis and supervise the facility to maintain it in a sanitary condition. All containers will be emptied at the end of the day or the containers covered. Containers for waste will be designed to prevent spillage or leakage during storage, handling, or transport.

An area will be reserved near the CCS for white goods, bulky items, and tires. This storage area will be kept neat and tidy to minimize vector attraction. The area will be under an overhead cover, or tarps will be used to help reduce odor potential and to minimize contact with rainfall.

Materials in storage areas will be collected and removed often enough to prevent them from becoming a nuisance and to preclude the discharge of pollutants from the area.

8. Operating Hours [30 TAC 330.135]

The anticipated hours of waste acceptance at the WST Landfill will be Monday through Saturday, 7:00 a.m. to 7:00 p.m. Actual hours of waste acceptance within this time frame will be posted at the entrance to the facility.

Transportation of materials and heavy equipment operation will be limited to Monday through Saturday, 5:00 a.m. to 9:00 p.m. There will be at least two landfill employees on-site at all times during waste acceptance hours. The operation of heavy equipment at the landfill will not occur between 9:00 p.m. and 5:00 a.m.

To accommodate special occasions, special purpose events, holidays, or other special occasions, WST may accept waste from 5:00 a.m. to 11:00 p.m. on selected days. These days include the following and may be changed with notification to the TCEQ Region office:

- January 2
- Tuesday following Memorial Day
- July 5
- Friday after Thanksgiving
- December 26

The TCEQ regional office may allow additional temporary waste acceptance or operating hours to address disasters, other emergency situations, or other unforeseen circumstances that could result in the disruption of waste management services in the area. Prior to operating outside of the hours approved by permit, WST will seek written approval from the TCEQ regional office.

Any operating hours outside of the standard hours will be documented in the SOR with the date, time, and duration of each occurrence.

9. Site Sign [30 TAC 330.137]

The landfill operator shall ensure that there is a conspicuously displayed sign at the landfill entrance that measures at least 4 feet by 4 feet with letters at least 3 inches high stating (1) the facility name, (2) the type of facility, (3) the hours and days of operation, (4) emergency 24-hour contact phone number(s), (5) the local emergency fire department phone number, (6) a warning against the disposal of prohibited materials, and (7) the facility's permit number.

The emergency contact number must reach individual(s) with the authority to obligate the facility at all times that the facility is closed. The sign(s) must be readable from the facility entrance.

Signs will also be maintained at the CCS and will specify who may use the station, which wastes are accepted and prohibited, and any other information WST deems necessary for safe and efficient operation.

10. Windblown Waste and Litter [30 TAC 330.139]

10.1 Litter Control [30 TAC 330.139]

Operational procedures shall be implemented at WST Landfill to minimize the generation of litter and debris that is tracked, blown, or spilled off-site as discussed in this section. Solid waste haulers will be required to cover their loads prior to entering WST Landfill; tarps will not be removed until the haul vehicle reaches the working face. If needed, the site may institute a combination of permanent and portable litter control fences to catch windblown litter and debris. Portable fences will be deployed as a disposal operation progresses through a given cell. Solid waste personnel will be responsible for collecting litter accumulated throughout the facility, along fences and access roads, along the entrance road within property boundaries and adjacent properties, and at the facility's gate on a daily basis that waste is being received at the facility. Specific litter control activities are detailed as following:

- Daily cover shall be applied at the end of each operating day to secure waste.
- All incoming loads shall be assessed at the scale house and additional fees will be charged for any unsecured loads.
- A 4-foot-high berm will surround the property to prevent litter or debris from being blown off-site by wind. Solid waste personnel will inspect and remove any litter that rests against or becomes attached to the berm. In addition, landfill personnel will retrieve loose solid waste that passes beyond the immediate area of the berm and return it to the working face on a daily basis.
- Landfill personnel will consult with Reeves County to coordinate daily cleanups of adjacent right-of-way (ROW) within 2 miles of the site when WST Landfill is open for waste acceptance, as required by 30 TAC 330.145.

- Portable wind fences shall be used as an additional means of controlling windblown litter. These fences may be moved by landfill personnel throughout the day to achieve complete control of blowing debris resulting from sudden changes in wind direction. During high wind events, waste placement will occur in areas of the active cells that are minimally impacted by the wind, such as areas that are located at lower elevations or are shielded by the surroundings.
- During periods of high wind, disposal operations shall either be controlled by applying soil cover in an accelerated manner or by relocating to areas which receive minimal wind impact.
- Containers located within the CCS will be covered by a tarp or similar device at the end of each working day or taken and emptied at the active disposal area to prevent the generation of windblown litter and debris. Any spilled waste leading to the CCS will be picked up and disposed of at the working face on a daily basis during the time that the CCS is being used. Portable or permanent fencing or enclosures may be used at the CCS if needed to control the scattering of litter or debris.

11. Easements and Buffer Zones [30 TAC 330.141]

No solid waste unloading, storage, disposal, or processing operations will occur within any easement, buffer zone, or ROW that crosses the permit boundary [30 TAC 330.141]. No solid waste disposal shall occur within 25 feet of the centerline of any utility line or pipeline easement, unless otherwise authorized by TCEQ. All pipeline and utility easements must be clearly marked with posts that extend at least 6 feet above ground level and spaced at intervals no greater than 300 feet. As previously mentioned in the landfill permit, there are no conflicts with existing easements.

WST shall establish and maintain 125-foot buffer zones within and adjacent to the facility boundary on property owned or controlled by WST. The buffer zones shall not be narrower than 20 feet or as necessary to provide for safe passage for fire-fighting and other emergency vehicles.

12. Landfill Markers and Benchmark [30 TAC 330.143]

All required landfill markers and the benchmark will be clearly visible and marked for landfill personnel and state officials. A permanent bronze benchmark set in concrete has been established at the facility in the northwest corner of the property, away from landfill operations, and is marked with its survey date and elevation. All markers will be posts extending at least 6 feet above ground level, will be clearly visible, and will not be obscured by vegetation. Markers will be installed at the following locations and color coded as follows:

- Black: facility boundary markers
- Yellow: buffer zone markers
- Green: easement and ROW markers (if applicable)
- White: landfill grid system markers
- Red: soil liner or geomembrane liner area markers
- Blue: 100-year flood protection area (if applicable)

Facility boundary markers will be placed at each corner of the facility and along each boundary line at intervals no greater than 300 feet. Easement and ROW markers shall be placed along the centerline of the easement or along the boundary of an ROW at each corner within the facility and at the intersection of the facility boundary. WST shall replace any markers within 15 days of removal, destruction, or a determination that the markers do not meet regulatory requirements. WST will inspect landfill markers on a monthly basis and maintain records of all inspections at the facility.

A landfill grid system has been established for the facility. Markers along the grid system will encompass at least the area expected to be filled within the next three-year period. Landfill grid markers will be maintained during the active life of the facility. Although not required, the grid system may be maintained through the post-closure care period of the landfill if determined to assist during this time. Markers for the grid system shall be spaced within 100 feet of each other measured along perpendicular lines, and intermediate markers will be installed where markers cannot be seen from opposite boundaries. Grid markers may be placed along the boundary of a buffer zone and are not required in areas of active fill.

Soil liner or geomembrane liner area markers will be placed so that all areas for which a SLER or GLER has been submitted are readily determinable. These markers must be tied into the landfill

grid system and must be reported on each liner evaluation report submitted. Liner markers shall not be placed inside construction areas to prevent damage to liner. Soil liner or geomembrane liner area markers will be maintained through the construction and operation period.

Landfill markers and the benchmark shall be clearly visible. Per the drainage report (Attachment III-3), no flood protection markers are needed.

Latitudinal and longitudinal geographic coordinates of site benchmark are as follows:

- Latitude: N 31°26′23.66762″
- Longitude: W 103°34′50.57074″
- Elevation: 2,659.30 feet above mean sea level (feet msl), North American Vertical Datum of 1988 (NAVD 88)

13. Materials Along the Route to the Site [30 TAC 330.145]

WST will take steps to encourage vehicles hauling waste to the landfill to use a tarpaulin, net, or other means to effectively secure their load to prevent the load from blowing or spilling debris. WST will post signs and report offenders to law enforcement. WST may also add surcharges, or implement similar measures as needed. On days that the landfill accepts waste, WST will clean up waste materials spilled along and within ROW of public access roads serving the facility for 2 miles in either direction from the entrance used to access the facility. WST will consult with Reeves County concerning cleanup of public access roads and ROW.

14. Disposal of Large Items [30 TAC 330.147]

Large, heavy, or bulky items detected during unloading that are not designated as prohibited waste and that cannot be incorporated in the regular spreading, compaction, and covering operations at the landfill shall be placed in a designated large-item salvage area. This large-item salvage area is located near the CCS and will consist of temporary storage roll-off containers or an area with an improved surface. Large, heavy, or bulky items may include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, and automobiles.

Should large, heavy, or bulky items be received in mixed loads and not observed until unloading, they will be removed from the active face if it is determined safe to do so and will be staged near the active working face until the end of the day and/or immediately moved to the designated large-item salvage area. Whole scrap or used tires will also be stored in the large-item salvage area until transported off-site for management.

Refrigerators, freezers, air conditioners, and any other items containing CFCs will be handled in accordance with 40 CFS 82.156. WST will remove large items and tires from the designated storage area often enough to prevent them from becoming a nuisance and to preclude the discharge of any pollutants from the area, at a frequency no longer than every 180 days.

15. Odor Management Plan [30 TAC 330.149]

WST Landfill will follow all applicable air pollution regulations. Open burning is not allowed.

While odorless methane and carbon dioxide gases comprise over 99 percent of all landfill gases, an incoming load of waste may occasionally exhibit a unique odor. Such odors typically result from trace-level gases produced during the decomposition of landfilled waste. WST Landfill shall enact various measures to ensure odor control. Any potential odor observed at WST Landfill will be investigated to determine the source and any mitigation efforts.

To ensure that odors are kept at a minimum, the working face shall be limited in size to restrict any exposed waste to a small area. At the close of each operational day, all exposed solid waste shall be covered with a minimum of 6 inches of daily cover or an approved alternate daily cover (ADC). All other areas of WST Landfill will be monitored as part of the daily operation of the facility and, during those occasions when solid waste is found exposed, the waste will be sufficiently covered to ensure that odors are kept to a minimum.

Other mitigation methods for odor control within the waste disposal footprint include removal of contaminated water in accordance with the leachate and contaminated water plan (LCWP) (Appendix III-4-B).

Landfill personnel will be trained to identify and mitigate odors for waste requiring special attention such as septage, sludges, and dead animals. Specific handling instructions for each special waste are detailed in Section 26 of this SOP. Cashiers/customer service representatives will monitor for odorous waste as it arrives. If odorous wastes are delivered on a routine basis, landfill personnel shall coordinate with the waste generator to schedule such deliveries.

Odorous wastes requiring special attention shall be promptly covered, and any spills of such waste shall be cleaned up.

Containers located within the CCS, large-item salvage area, and tire storage area shall be monitored by landfill personnel and covered with a tarp or similar device to prevent the accumulation of rainfall and mitigate potential odors. Containers will be cleaned when needed. The CCS is constructed of containers on an improved surface bordered by a 6-inch curb and can be cleaned. Should waste material spill onto the surface, the material will be picked up and disposed of at the working face or into containers for later removal to the working face. The surfaces will be cleaned as needed by washing down with water, at least weekly. Wash water from the containers or surfaces shall be contained and treated as contaminated water in accordance with the LCWP.

The contact stormwater/leachate pond or tanks will be monitored daily by landfill personnel for odors. Should odors from the leachate pond or tanks become a nuisance, WST will investigate the reason and employee mitigation efforts.

16. Disease Vector Control [30 TAC 330.151]

Disease vector control at WST Landfill will consist of procedures for compaction, grading, and soil cover. The active face shall be compacted and graded on a daily basis and covered by either 6 inches of soil not previously mixed with garbage, rubbish, or other solid waste or other approved ADC. Dead animals will be covered immediately in accordance with Section 26 of this SOP. These procedures will prevent vector access and harborage in the waste mass. The application of daily cover will also eliminate any entry spaces, food sources, and nesting areas. Surface water control measures and liquid waste restrictions will minimize the presence of standing water and decrease insect breeding areas. Mosquito populations will be controlled by preventing the accumulation of stagnate water through routine grading of slopes and maintaining surface grades that are adequate to prevent ponding.

The CCS, large-item salvage, and tire storage area will be inspected daily for animal scavenging or vector accumulation. Any spilled waste shall be collected daily and returned to the containers or disposed of at the working face. Containers used in this area shall be emptied at the working face and cleaned as needed. Any water resulting from the cleaning of the CCS area or its containers shall be contained and treated as contaminated water in accordance with the LCWP.

Landfill personnel will perform weekly inspections to check for insect or rodent infestations. If insect or rodent infestations occur despite the measures outlined herein, approved insecticides or pesticides shall be applied by a pest control professional licensed in the State of Texas.

17. Site Access Roads [30 TAC 330.153]

The main access road to WST Landfill is a paved, all-weather road. Interior facility access roads will be constructed from crushed stone, gravel, caliche, concrete paving, asphalt paving, or other suitable material. Roadways shall be maintained to provide functional, safe, and clean passage for vehicular traffic year-round. In addition, traffic control measures will be implemented to direct incoming and outgoing traffic. The landfill personnel will ensure that all traffic control measures are operational and properly maintained.

Interior roads will be maintained to provide reasonable all-weather access for arriving vehicles. Roads will be regraded as needed to minimize depressions, ruts, and potholes per 30 TAC 330.153. In the case of muddy conditions, roads will be inspected continuously by landfill personnel. Excessive mud on roadways that may lead to difficult driving conditions will be removed daily and as needed to maintain site access. Equipment such as a grader, bulldozer, skid steer, or other appropriate earth mover will be used. As needed, gravel, crushed stone, or other suitable material will be applied to maintain roadways during wet weather. Dust will be suppressed on site roads by periodic spraying from a water truck. During wet weather, the all-weather surfaced site access roads, rock vehicle tracking pad, cattleguard, and the entrance road to the site will allow vehicles to throw off any mud from their tires prior to entering public roadways. Should mud and associated debris be tracked onto CR 408, the materials will be removed at least once daily, typically by using the water truck and/or motor grader or mechanical sweeper.

The approach to the working face shall be maintained so that two or more vehicles will be able to unload side-by-side. A turnaround area of sufficient size will be maintained so that vehicles may maneuver safely into and out of the unloading area. Vehicles will not be allowed to loiter at the working face.

The potential for development of dust will be minimized through proper operating procedures. Speed limits will be enforced on access roads and the roads will be sprayed using a water truck to control dust as necessary. Water for dust control will be obtained from detention ponds or a water well. If necessary, commercial dust-control may be sprayed on the road surfaces to retard the spread of dust.

On-site roads will be maintained on a regular basis. Access roadways will be regraded to minimize depressions, ruts, and potholes when they would interfere with access to the unloading area. Typically, regrading will be required after significant rain events and will be performed while the materials are sufficiently moist to facilitate grading and recompaction. Road repair materials such as cold mix asphalt, stone, or gravel will be stockpiled on-site for use as necessary.

18. Salvaging and Scavenging [30 TAC 330.155]

18.1 Scavenging

Scavenging is characterized as the uncontrolled or unauthorized removal of materials at any point in the solid waste management system. Scavenging is prohibited at the WST Landfill.

18.2 Salvaging, Recycling, and Temporary Storage

Salvaging is characterized as the controlled removal of waste materials for use, recycling, or sale. Salvaging that interferes with the prompt sanitary disposal of solid waste or that creates a public health nuisance is prohibited. At WST Landfill, salvaged materials are primarily white goods and used tires. Salvaged materials will be removed from the facility regularly and will not be stored in excess of 180 days to prevent them from becoming a nuisance.

WST Landfill shall collect large and bulky items that cannot be incorporated into the regular operations at the landfill and shall place them into a designated large-item storage area. Users of the CCS will be instructed on how to separate salvageable items from the material to be disposed of and where to place the items.

Class 1 industrial waste and other special wastes received at the disposal facility shall not be eligible for salvage. Pesticide, fungicide, rodenticide, and herbicide containers shall not be salvaged. No salvage operations by members of the public will be allowed.

19. Endangered Species Protection [30 TAC 330.157]

A comprehensive biological evaluation (BE) was performed in January 2022 for the WST Landfill site. The evaluation included a physical biological survey conducted in September 2021. The BE is provided in Attachment I/II-11. The evaluation found no critical habitat within the boundaries

of the proposed facility; however, the study did reveal potential impacts to several federally threatened, endangered, or candidate species as defined by the U.S. Fish and Wildlife Service (USFWS), as well as various state-listed rare species as defined by the Texas Parks and Wildlife Department (TPWD). The BE was provided to TPWD for review, and TPWD returned a letter with recommendations to safeguard any wildlife that may be impacted by facility operations. WST Landfill will implement procedures to identify, avoid, and mitigate any interferences. TPWD provided the following recommendation that WST Landfill will incorporate in operations:

- Landfill personnel shall provide training on protected species to any contractors on-site. Training shall include the identification of Texas horned lizards and their primary food source (harvester ants), and shall describe appropriate protocols to avoid the impact of the Texas horned lizard or any other rare or protected species. Harvester ant mounds shall be avoided.
- Burrows shall be identified and avoided. Excavation of such habitats may be detrimental to eggs, young, or adults, and may be in direct violation of the Migratory Bird Treaty Act (MBTA). If black-tailed prairie dogs are encountered within the construction footprint, WST Landfill shall contact a prairie dog relocation specialist.
- If possible, construction activities shall take place outside of the general bird nesting season (March 15 through September 15) and vegetation removal or disturbance shall occur outside of the peak nesting period (March through August). If clearing vegetation during these periods is unavoidable, a physical survey shall be performed no more than five days prior to the activity to identify active bird nests (containing eggs or young). If any active nests are observed, a minimum 150-foot buffer of vegetation shall remain around the location during disturbance activities. Any vegetation or other open areas where occupied nests are located shall not be disturbed until the eggs have hatched and the young have fledged. WST Landfill shall not allow the catching, killing, injuring, pursuance, or possession of any bird that is not a game bird per Texas Park and Wildlife Code.
- In cold weather, reptiles may have slower metabolisms and a restricted ability to flee from danger. Construction personnel shall be alerted this fact when working in cold weather to avoid impact on dormant reptiles.
- The clearing of native vegetation shall be minimized, particularly mature native trees, riparian vegetation, and shrubs, to the greatest extent practicable. The disturbance or removal of downed trees, rotting stumps, and leaf litter shall be avoided where feasible.
- Revegetation shall be conducted using no-till drilling, hydromulching, and/or hydroseeding of regionally adapted native species including native flowering species. Colonization by

invasive species shall be actively prevented. If soil stabilization or erosion prevention measures are desired, materials shall be chosen that do not pose entanglement hazards to wildlife. The use of plastic mesh matting shall be avoided due to entanglement risk as much as practicable.

- If any protected species are encountered, they shall be avoided and allowed to leave the project area on their own. If the relocation of wildlife is necessary, WST Landfill shall consult a qualified biologist (authorized to handle any threatened, endangered, and state-listed species) to perform the relocation. Relocations shall occur at the minimum distance possible, no greater than 1 mile, and ideally within 100 to 200 yards from the initial location of the encounter.
- Exclusion or sediment control fencing shall be used judiciously to preclude wildlife from construction areas. The fencing shall be buried at least 6 inches and extend to at least 24 inches in height. It shall be maintained for the life of the project and only removed once the construction is complete and the disturbed area is reestablished with native vegetation.
    - Construction personnel shall be encouraged to examine the exclusion area daily for trapped wildlife and provide safe egress opportunities prior to the commencement of construction activities.
- Open trenches and excavated pits may be covered overnight to prevent the accidental trapping of wildlife species. Trenches and pits shall be inspected daily prior to the commencement of construction activities and escape ramps at an angle of no greater than 45 degrees (1:1) shall be erected in any uncovered areas.
- Dark-sky lighting practices shall be implemented which minimize blue light emissions and sky glow. Light shall be focused downward to avoid emitting light above the horizontal, and night-time lighting shall be of the minimum brightness needed to achieve safety and security.
- A no-kill wildlife policy shall be adopted, which includes avoiding injury or harm to any snakes encountered during clearing and construction.
- Speed limits in the project area shall be reduced to at most 15 miles per hour (mph) to prevent vehicle-induced mortality of wildlife.

20. Landfill Gas Control [30 TAC 330.159]

Landfill gases will be monitored in accordance with the landfill gas management plan (LGMP) (Attachment III-7). Reports and other submittals will be included in the facility SOR and submitted to TCEQ as required.

When required, WST will apply for a standard air permit in accordance with Subchapter U of 30 TAC 330. WST will apply for any other authorization or permit required by regulation.

21. Oil, Gas, and Water Wells [30 TAC 330.161]

There are no active crude oil wells, gas wells, or other wells associated with mineral recovery known to exist within the MSW facility permit boundary. There are no known abandoned oil wells or water wells within the permit boundary.

The current water supply well at WST Landfill is, and any future supply wells will be, located outside of the waste footprint and will not be impacted by landfill operations. The current well is constructed to prevent any cross-contamination from waste at the landfill to the water well production zone and between any water-bearing zones. Any future supply well will be approved by the TCEQ Executive Director and will conform to all standards set forth in 30 TAC 330.161. Details regarding the sampling schedule are provided in the groundwater sampling and analysis plan (Attachment III-6).

If any crude oil or natural gas well, or other well associated with mineral recovery that is under the jurisdiction of RRC is discovered within the facility boundary during the course of facility development, WST will, within 30 days of discovery, notify TCEQ in writing regarding the location of such well(s). Within 30 days after plugging of any such well, WST will provide TCEQ with written certification that the well has been properly capped, plugged, and closed in accordance with all applicable RRC rules and regulations.

Any well to be capped, plugged, and closed will be exposed, with the casing cut to a minimum of 2 feet below ground surface (or, if the well location is within the proposed landfill footprint, a minimum of 2 feet below the excavation depth), and the well will be capped and plugged in accordance with all applicable rules and regulations of TCEQ, RRC, or other applicable state agency. A copy of the well plugging report required to be submitted to the appropriate state agency will be submitted to TCEQ within 30 days after the well has been plugged.

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

22. Compaction [30 TAC 330.163]

Compaction of incoming waste will be conducted to minimize future consolidation and settlement, maximize the use of developed disposal capacity, and provide for the proper application of intermediate and final cover. Waste compaction will be conducted using a landfill compactor or dozer with a minimum weight of 40,000 pounds. After unloading, the waste will be spread in approximately 3-foot-thick layers and each layer will be compacted with a minimum of two machine passes of the landfill compactor or four machine passes with a dozer. The layer thickness may be increased if proven to be satisfactorily compacted with the available compaction equipment.

23. Landfill Cover [30 TAC 330.165]

Landfill cover is an important aspect in protecting public health and the environment. There are three types cover required: daily cover (including ADC), intermediate cover, and final cover.

The following procedures will be implemented regarding placement of cover:

- The cover material will be spread and compacted by heavy equipment to minimize infiltration of stormwater and will not have waste visibly protruding from it.
- The General Manager, Site Operations Manager, or designee will visually inspect the cover to verify that the correct thickness of compacted soil is placed and that there is no erosion that may jeopardize placement of future cover material. The results of this inspection will be included in the SOR, and any recorded damage will be repaired within five days (weather permitting).
- After every significant precipitation event, the General Manager, Site Operations Manager, or designee will inspect all covered areas for erosion, exposed waste, or other damage and oversee its repair as needed.
- All cover will be sloped to drain runoff toward stormwater management structures.

23.1 Daily Cover

WST Landfill will follow daily cover requirements per 30 TAC 330.165 unless the waste in discussion falls under a special waste category and requires distinctive treatment as prescribed in Section 26 of this SOP. WST Landfill will cover the active face(s) of the landfill at the end of each working day with 6 inches of soil material not previously mixed with garbage, rubbish, or other solid waste. This practice will assist in controlling vectors, fires, odors, windblown litter and scavenging. Runoff from areas where the daily cover has maintained its integrity is considered to not have come in contact with the working face or leachate and will not be treated as contaminated water.

23.2 Alternate Daily Cover

ADC will only be allowed by a temporary authorization under 30 TAC 305.62(k) followed by a major amendment or a modification in accordance with 30 TAC 305.70(k)(1). The use of ADC will be limited to a 24-hour period (unless otherwise approved by the TCEQ), after which either waste or other cover material will be placed over it. If requesting an amendment or modification to allow for the use of ADC, WST will provide an ADC operating plan that includes the criteria listed in 30 TAC 330.165(d)(1)(A)-(E).

WST will submit a status report on the ADC on a two-month basis to the Executive Director during the temporary authorization period describing the effectiveness of the ADC material, any problems that have occurred, and corrective actions required as a result of such problems. At the discretion of TCEQ, status reports may not be necessary if no unresolved problems occur within the temporary authorization period.

The following types of ADC or similar materials will be used consistent with the approval granted by TCEQ and at the discretion of the operator.

- Tarpaulins: Typical nominal weight of 10 ounces per square yard.
- Contaminated soil: Soil that has been exposed to petroleum products but has been demonstrated by analysis to have a total petroleum hydrocarbon (TPH) concentration less than 1,500 parts per million (ppm). The soil may contain other contaminants, but shall comply with 30 TAC 330.165(d)(4) & (5) and shall have a waste classification of Class 2 or 3 industrial.

Contaminated soils proposed to be used as ADC must not exceed composition limitations imposed on the waste authorized to be disposed of within that landfill unit, including

constituents such as TPH, PCBs, or CFCs (see Section 26), and other constituents listed in Table 1 of 30 TAC 335.521(a)(1).

23.3 Intermediate Cover

All areas that have received waste but will be inactive for longer than 180 days will be covered with intermediate or final cover. Intermediate cover will include 6 inches of suitable earthen material that is capable of sustaining native plant growth and will be seeded or sodded following its placement to control erosion, or will be a material approved by TCEQ for intermediate cover that will otherwise control erosion. The total thickness of the intermediate cover will not be less than 12 inches of suitable earthen material. The intermediate cover will be sloped to shed stormwater runoff away from the active area and to prevent ponding. Plant growth or other erosion control features will be maintained. Runoff from areas that have intact intermediate cover is not considered as having come into contact with the working face or leachate and is not contaminated water.

The General Manager or designee will inspect intermediate cover at least monthly or within 72 hours of a rainfall event of 0.5 inch or more for erosion, ponded water, seeps, protruding waste, or other issues that may result in contaminated runoff, and will record the results in the SOR. If an area containing intermediate cover is later revisited for the acceptance of waste, the intermediate cover may be stripped and reused if the cover is not contaminated with garbage, rubbish, or other solid waste material.

23.4 Final Cover

The final cover system design and placement are described in the Final Closure Plan (Attachment III-8), maintained as part of the SOR. The General Manager or designee will inspect final cover at least semiannually or within 72 hours of a rainfall event of 0.5 inch or more for erosion, ponded water, seeps, protruding waste, or other issues that may result in contaminated runoff, and will record the results in the SOR. Final cover monitoring during the post-closure period is outlined in the Post-Closure Maintenance Plan (Attachment III-9), which is also maintained as part of the SOR.

23.5 Cover Inspections

As soon as practicable after a rainfall event of 0.5 inch or greater, the General Manager or their designee will inspect daily, intermediate, and final cover areas for erosion gullies, washed out areas, or other damage. Erosion rills or gullies or washouts deeper than approximately 4 inches

will be repaired as soon as practicable, but not later than five days after detection. Periodic inspections and restorations will be required during the operational life and the post-closure care maintenance period.

Throughout the landfill operation, a cover application record will be kept on-site readily available for inspection by TCEQ representatives and authorized agents or employees of local governments having jurisdiction. For daily and intermediate cover and ADC, the record will specify the date cover was accomplished (no exposed waste), how it was accomplished (soil or ADC type and method of placement), and the last area covered. For final cover, the record will specify the area covered, the date the cover was applied, and the thickness applied that date. Each entry will be certified by the signature of the inspector that work was accomplished as stated in the record.

24. Ponded Water [30 TAC 330.167]

The prevention of ponding water over waste is necessary to prevent infiltration and reduce the volume of leachate produced at the facility. Ponded water may also result in odors and act as a breeding ground for disease vectors. The ponding prevention plan is described as follows:

- The ponding of water on cover over waste will be avoided by good compaction of the waste material and cover. The cover will be placed with adequate slope or the inclusion of diversion berms to promote runoff and to accommodate more localized settlement without forming depressions.
- Cover areas will be inspected as described above and as soon as practicable after significant rainfall events (0.5 inch or more) to detect areas that may be ponding water.
- The removal of water, filling, and grading of any ponded areas with soil will be used to eliminate any ponding that is observed.

Ponded water that is discovered in any active or 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.

Ponded water removed from cover depressions will typically be stormwater and may be used to aid in dust control or discharged as stormwater. However, if the cover has been damaged to the extent that the ponded water has come in contact with waste, leachate, or waste-contaminated soil, the water will be treated as contaminated water consistent with the LCWP.

Containers used at the CCS will be covered by a tarp or similar device to prevent the accumulation of rainfall when not in use. When the containers are full and at the end of the working day, the containers will be emptied at the active area for disposal.

The large-item and tire storage area will be graded to prevent ponding. Any water that may pond will be removed and the area filled with soil to prevent reoccurrence.

Repairs to areas that pond water will be documented in the SOR.

25. Enclosed Containers or Vehicles at Type IV Landfills [30 TAC 330.169]

WST Landfill is not a Type IV landfill and the requirements of 30 TAC 330.169 are not applicable.

26. Disposal of Special Wastes [30 TAC 330.171]

WST Landfill may accept special waste consistent with the Waste Acceptance Plan (Attachment I/II-9) and as approved by TCEQ. Special wastes listed under 30 TAC 330.171(c) and that are listed below will be managed per the handling procedures identified in 30 TAC 330.171(c)(1)-(7) and (d). Any special waste not identified in this section will not be accepted without prior written waste-specific and site-specific approval from the TCEQ.

Requests for approval to accept special wastes will be submitted by the generator to WST Landfill. If acceptable to WST Landfill, a request will be submitted to TCEQ for acceptance of the waste. Approval will be granted prior to accepting the waste.

Specific special wastes authorized for acceptance at the WST Landfill, along with their handling procedures, are listed below.

26.1 Petroleum-Contaminated Soil

Definition

Petroleum-contaminated soil (PCS) is soil contaminated by petroleum products, crude oils, or chemicals. PCS may be accepted for disposal provided that the TPH concentration is not greater than 1,500 ppm.

Special Handling Procedures:

PCS may be incorporated into the active disposal area or used as ADC if approved by TCEQ. See Section 23.2.

26.2 Treated Medical Waste

Definition

Treated medical waste is special waste from health care-related facilities that consists of animal waste, bulk blood, bulk human blood, bulk human body fluids, microbiological waste, pathological waste, and sharps as those terms are defined in 25 TAC 1.132 (relating to Definitions). Health care-related facilities do not include single or multi-family dwellings and hotels, motels, or other establishments that provide lodging and related services for the public.

Special Handling Procedures

Medical wastes that have not been treated will not be accepted at the landfill unless authorized in writing by TCEQ. Accepted medical waste will be covered by either 3 feet of solid waste or at least 2 feet of earthen material immediately upon receipt.

26.3 Dead Animals or Slaughterhouse Waste [30 TAC 330.171(c)(2)]

Definition

This waste consists of carcasses and animal part waste from slaughterhouses, farms, or hatcheries.

Special Handling Procedures

Dead animals and/or slaughterhouse waste will be covered by 3 feet of other solid waste or at least 2 feet of earthen material upon receipt.

26.4 Empty Containers used for Pesticides, Herbicides, Fungicides, or Rodenticides [30 TAC 330.171(c)(5)]

Definition

These wastes consist of vessels that were previously used to contain pesticides, herbicides, fungicides, or rodenticides.

Special Handling Procedures

The containers must be triple-rinsed and rendered useless prior to receipt at the landfill. If the provisions of waste acceptance are met, empty containers will be placed on the active working face of the landfill and covered by the end of the operating day. Containers for which triple-rinsing is not feasible or practical (e.g., paper bags, cardboard containers) and are empty may be accepted and treated as Class 1 non-hazardous waste and disposed in an area approved for Class 1 non-hazardous waste. The weight or volume of such waste shall be factored into the total permissible amount of Class 1 non-hazardous waste allowed for disposal at the facility per 30 TAC 330.173(e).

26.5 Municipal Hazardous Waste from Very Small Quantity Generators [30 TAC 330.171(c)(6)]

Definition

This waste is generated by RCRA CESQGs or VSQGs, and consists of any municipal solid waste that has been identified or is listed as a hazardous waste but is generated in quantities less than 220 pounds per month or as listed in 30TAC330.3(177).

Special Handling Procedures

Review and keep track of accepted municipal hazardous wastes for each VSQG per month to verify that no more than 220 pounds of waste is accepted.

26.6 Sludge, Grease, and Grit Trap Waste and Liquid Waste from Municipal Sources [30 TAC 330.171(c)(7)]

Definition

This waste is any solid, semi-solid, or liquid waste generated from a municipal or domestic wastewater treatment plant, sewage treatment plant, water-supply treatment plant, septic tank, grease trap, or grit trap, exclusive of the treated effluent from a wastewater treatment plant.

Special Handling Procedures

Verify that all waste has been treated/processed prior to delivery to pass the paint filter liquids test. The waste will be covered with other waste or soil immediately if it is odorous.

26.7 Household-Generated Used Oil Filters [30 TAC 330.171(d)]

Definition

This waste consists of used oil filters from internal combustion engines that originate from households as defined in 30 TAC 330.3(67)171.

Special Handling Procedures

Used oil filters from non-household generators shall not be accepted. Used oil filters from a household generator shall not be intentionally and knowingly accepted for disposal unless the filter has undergone one of the following processing methods prior to receipt at the landfill:

(1) the filter has been crushed to less than 20% of its original volume to remove all free-flowing used oil;

(2) the filter has been separated into component parts and any the free-flowing liquids have been removed from the filter element by some means of compression;

(3) the used filter element of a filter consisting of a replaceable filtration element in a reusable or permanent housing has been removed from the housing and pressed to remove free-flowing used oil; or

(4) the housing has been punctured and the filter has drained for at least 24 hours.

26.8 Soil Contaminated by Petroleum Products or Other Constituents [30 TAC 330.171(b)(4)]

Definition

This waste is soil contaminated by petroleum products, crude oil, or chemicals in concentrations of greater than 1,500 milligrams per kilogram (mg/kg) TPH or contaminated by constituents of concern at concentrations exceeding the limits listed in Table 1 of 30 TAC 335.521(a)(1).

Special Handling Procedures

Contaminated soils meeting these criteria shall be disposed of in a Class 1 landfill unit and incorporated with other waste.

27. Disposal of Industrial Wastes [30 TAC 330.173]

WST Landfill will not accept hazardous waste, but may accept industrial waste material that is classified as Class 1 non-hazardous, Class 2, or Class 3. Industrial non-hazardous waste is defined in 30 TAC 330.3 as solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations.

WST Landfill will not accept Class 1 waste without prior approval from TCEQ or specific authorization as presented below. The Operations Manager or designee will sign manifests for authorized shipments of Class 1 waste. WST Landfill will not accept or sign for shipments of Class 1 waste unless authorization to accept the waste is provided by TCEQ. The disposal facility copy of the manifest shall be retained by the operator for a period of at least 3 years or as directed by TCEQ.

Class 1 waste will not be placed above the perimeter berm in Class 1 units. The amount of Class 1 industrial waste received at the WST Landfill will not exceed 20 percent of the total amount of all waste accepted for disposal (not including the Class 1 waste) during the current or previous year per 30 TAC 330.173(e). The amount of waste will be determined by either volume or by weight. The same unit of measure will be used for each year unless a variance is authorized by TCEQ.

A written report of Class 1 wastes received will be submitted to TCEQ no later than the 25th day of the month following receipt of Class 1 waste. The monthly report will be submitted on forms provided by TCEQ and will be completely filled out with all required information. Monthly reports will be submitted every month following the initial receipt of Class 1 waste, even for months during which no Class 1 waste was accepted.

Industrial wastes to be accepted at WST Landfill, along with handling procedures, are presented in the following subsections.

27.1 Sludge, Liquid Waste, Grease Trap Waste, and Grit Trap Waste from Commercial or Industrial Generators

Definition

This waste includes any non-hazardous solid, semi-solid, or liquid waste generated from a commercial or industrial wastewater treatment plant, grease trap, or grit trap, exclusive of the treated effluent from a wastewater treatment plant. All sludge and liquid waste must treated/

processed prior to receipt at WST Landfill to remove all free liquids as defined by EPA Method 9095 (Paint Filter Liquids Test), *described in Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods* (EPA Publication Number SW-846), as amended. Industrial waste generators are responsible for properly classifying their waste under Subchapter R of 30 TAC Chapter 335.

Special Handling Procedures

Written approval from WST Landfill prior to delivery to the site is required for disposal of this waste. Verify that all sludge and liquid waste has been treated/processed and tested in accordance with the paint filter liquids test, and is certified to contain no free liquids. Cover the waste immediately if it is odorous; otherwise, incorporate with other waste.

27.2 Class 1 Non-Hazardous Industrial Solid Waste (excluding asbestos-containing materials) [30 TAC 330.173(e)]

Definition

This waste includes 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(1)-(7). Industrial waste generators are responsible for properly classifying their waste under Subchapter R of 30 TAC Chapter 335.

Special Handling Procedures

Written approval from WST Landfill is required prior to delivery to the site for the disposal of this waste. Generators will be responsible for the manifest of Class 1 solid waste as required by 30 TAC 335.10 (relating to Shipping and Reporting Procedures Applicable to Generators of Hazardous Waste or Class 1 Waste and Primary Exporters of Hazardous Waste). The generator will be required to provide a satisfactory waste analysis consistent with 30 TAC 335.587 for any wastes suspected to be hazardous or Class 1. WST will obtain and review the manifest provided by the generator as required by 30 TAC 330.173(g). The manifest will be signed by the facility operator or a designated representative. WST Landfill will not accept or sign for shipments of Class 1 waste for which the authorization to accept has not been granted by TCEQ or that is included in this section. Upon receipt of non-hazardous Class 1 waste, it shall be placed below

the top of the perimeter berm at the active face of a Class 1 unit. The waste will be placed away from exterior slopes and covered by at least 12 inches of earthen material or 3 feet of solid waste not classified as Class 1.

27.3 Class 2 Non-Hazardous Industrial Solid Waste [30 TAC 330.173(i)]

Definition

This waste includes any individual solid waste or combination of industrial solid wastes that cannot be described as hazardous, Class 1, or Class 3, as defined in 30 TAC 335.506 (relating to Class 2 waste determination).

Special Handling Procedures

WST Landfill will accept Class 2 non-hazardous waste provided that acceptance of the waste does not interfere with the landfill's operation. The waste will be incorporated with other waste at the active working face as part of normal operations.

27.4 Class 3 Non-Hazardous Industrial Solid Waste [30 TAC 330.173(j)]

Definition

This waste consists of 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 (relating to Class 3 waste determination).

Special Handling Procedures

WST Landfill will accept Class 3 non-hazardous waste provided that acceptance of the waste does not interfere with the landfill's operation. The waste will be incorporated with other waste at the active working as part of normal operations.

28. Visual Screening of Deposited Waste [30 TAC 330.175]

Waste will be screened from view, if needed, by strategic placement of mobile wind fence sections and soil berms, and by initially constructing above-grade exterior slopes and then working behind the completed slopes. Additional screening will be provided by daily/ intermediate cover.

29. Leachate and Gas Condensate Recirculation [30 TAC 330.177]

Recirculation of leachate or gas condensate will not be conducted at WST Landfill. The amount of contaminated water, including leachate and gas condensate, is anticipated to be minimal and easily managed with storage tanks or evaporation ponds.

30. Operational Requirements for Class 1 Industrial Solid Waste [30 TAC 330.179]

WST Landfill is designed for acceptance of Class 1 industrial waste that is determined to be non-hazardous. The acceptance procedures are discussed above. WST will complete facility maintenance and periodic inspections to verify that the facility remains in satisfactory operating condition.

30.1 Facility Inspection and Maintenance Schedule [30 TAC 330.179(a)(1) and 330.585]

Consistent with 30 TAC 335.585, the facility maintenance and inspection checklist (Table IV-3) will be used to verify that the site remains in satisfactory operating condition. The inspection schedule will be maintained at the facility. Records of the inspections, including the date and time, inspector's name, observations, and any repair information (i.e., date and time and nature of the repairs) are also maintained in the SOR. If inspections reveal any deterioration or malfunction of equipment, remedial action will be implemented to prevent an environment or human health hazard. If such a hazard is believed to be imminent or to be occurring, repairs will be conducted immediately.

30.2 Personnel Training [30 TAC 330.179(a)(2) and 335.586]

WST will implement programs (classroom and on-the-job) to train facility personnel to perform their duties in a safe manner and in compliance with this SOP. Training will also instruct personnel on waste management procedures and implementation of the contingency plan as is relevant to their position. This provides knowledge to respond effectively to emergencies consistent with 30 TAC 335.586. Training requirements and recordkeeping is detailed in Section 4.4 of this SOP. The contingency plan developed for WST Landfill is provided as Attachment IV-1.

30.3 Waste Analysis [30 TAC 330.179(a)(3) and 335.587]

WST will follow the waste analysis requirements of 30 TAC 335.587 for any waste that may be classified as industrial Class 1 or Class 2. MSW from municipal waste generators or haulers and industrial Class 3 waste from known sources will not require analysis. WST may require analysis to verify Class 3 status or to determine if specific handling requirements are recommended. An analysis of the waste may include the following:

- Waste generator's records of analysis conducted on the waste or studies conducted on waste generated from similar processes
- Any current information that WST or TCEQ determines would help in developing waste specific handling protocols, if needed
- Data developed under Subchapter R of 30 TAC 335 relating to waste classification

WST will inspect and analyze (if necessary) each Class 1 or 2 waste received to determine if it matches the waste specified on the accompanying manifest. The analysis must be repeated as necessary if there is reason to believe that the waste generation process or operation has changed. Additionally, if inspection of the waste does not match the designation on the accompanying manifest or shipping paper, WST will require additional analysis from the generator.

Prior to the receipt of Class 1 or 2 industrial waste, WST will develop a written waste analysis plan consistent with 30 TAC 330.587(b) that describes the waste analysis procedures that will be followed. The plan will include the following:

- The parameters to be analyzed for each waste and the rationale for selection of the parameters
- The test methods to be used

- The sampling method to be used to obtain a representative sample of the waste
- The frequency with which the analysis will be reviewed or repeated
- The waste analysis that the generators have agreed to supply, if any
- Where applicable, the methods used to determine if a waste is ignitable, reactive, or incompatible.

The waste analysis plan and results from any testing will be submitted to TCEQ for approval, if needed. Any recommended handling procedures will be included with the request. The waste will not be accepted until authorized by TCEQ.

30.4 Ignitable, Reactive, or Incompatible Wastes [30 TAC 330.179(a)(4) and 335.588]

WST Landfill will take precautions to prevent accidental ignition or reaction of wastes that are ignitable or reactive as defined in 30 TAC 335.505. If accepted, waste of this nature will be separated and protected from sources of ignition or reaction. Potential sources include, but are not limited to:

- Open flames
- Smoking
- Cutting and welding
- Hot surfaces
- Frictional heat
- Sparks (static, electrical, or mechanical)
- Spontaneous ignition (e.g., from heat-producing chemical reactions)
- Radiant heat

While ignitable or reactive waste is being handled, the landfill will confine smoking and open flame to specially designated locations. "No Smoking" signs will be conspicuously placed wherever there is a hazard from ignitable or reactive waste. Incompatible waste will not be accepted.

The landfill will take precautions to prevent reactions that:

- Generate extreme heat or pressure, fire or explosions, or violent reactions

- Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment
- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions
- Damage the structural integrity of the facility
- Threaten human health or the environment

Should there be a fire or explosion at WST Landfill, on-site personnel will follow the procedures discussed in the Contingency Plan (Attachment IV-1)

WST will document compliance with the requirements listed in 30 TAC 335.588. This documentation may be based on references to published scientific or engineering literature, data from trial tests (e.g., bench-scale or pilot-scale tests), waste analyses as specified in 30 TAC 335.587 and above, or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions. Documentation will be placed in the SOR.

30.5 Contingency Plan [30 TAC 330.179(a)(5) and 335.589]

WST has developed a contingency plan for personnel to follow to minimize hazards to human health or the environment from fires, explosions, or any unplanned release of waste. The contingency plan is provided as Attachment IV-1 to this SOP.

30.6 Whole or Scrap Tires

Whole or scrap tires that arrive at WST Landfill shall be placed in designated roll-off containers for temporary storage and shall not be incorporated in the regular spreading, compaction, and covering operations of the landfill. WST Landfill shall remove items from the storage area often enough to prevent them from becoming a nuisance and to preclude the discharge of any pollutants from the area. Additional measures shall be taken to minimize the area's risk to human health or the environment as described in Section 7 of this SOP.

30.7 Facility-Generated Wastes [30 TAC 330.205(a)]

WST Landfill does not expect to generate a significant volume of waste on-site. The landfill will follow 30 TAC 330.205 for all facility-generated wastes. All contaminated water, such as leachate, will be collected and contained until properly managed, and then disposed of according to 30 TAC 330.207. The contact stormwater/leachate pond processing unit will have a synthetic liner, and the liner shall be constructed in accordance with the Liner Quality Control

Plan (Appendix III-4-C). This processing unit shall be designed to control and contain spills and contaminated water from leaving the facility. The design shall be sufficient to control and contain a worst-case spill or release. In accordance with 30 TAC 330.207, 1 foot of freeboard for the 25-year, 24-hour rainfall event shall be provided. Leachate will be stored in the pond until it evaporates or stored in a storage tank, or shall be transported to an off-site water treatment facility. The landfill is not connected to a municipal sewer system and will not discharge to any such system. The landfill will not discharge contaminated water without authorization from TCEQ or any other government entity with jurisdiction.

Figure

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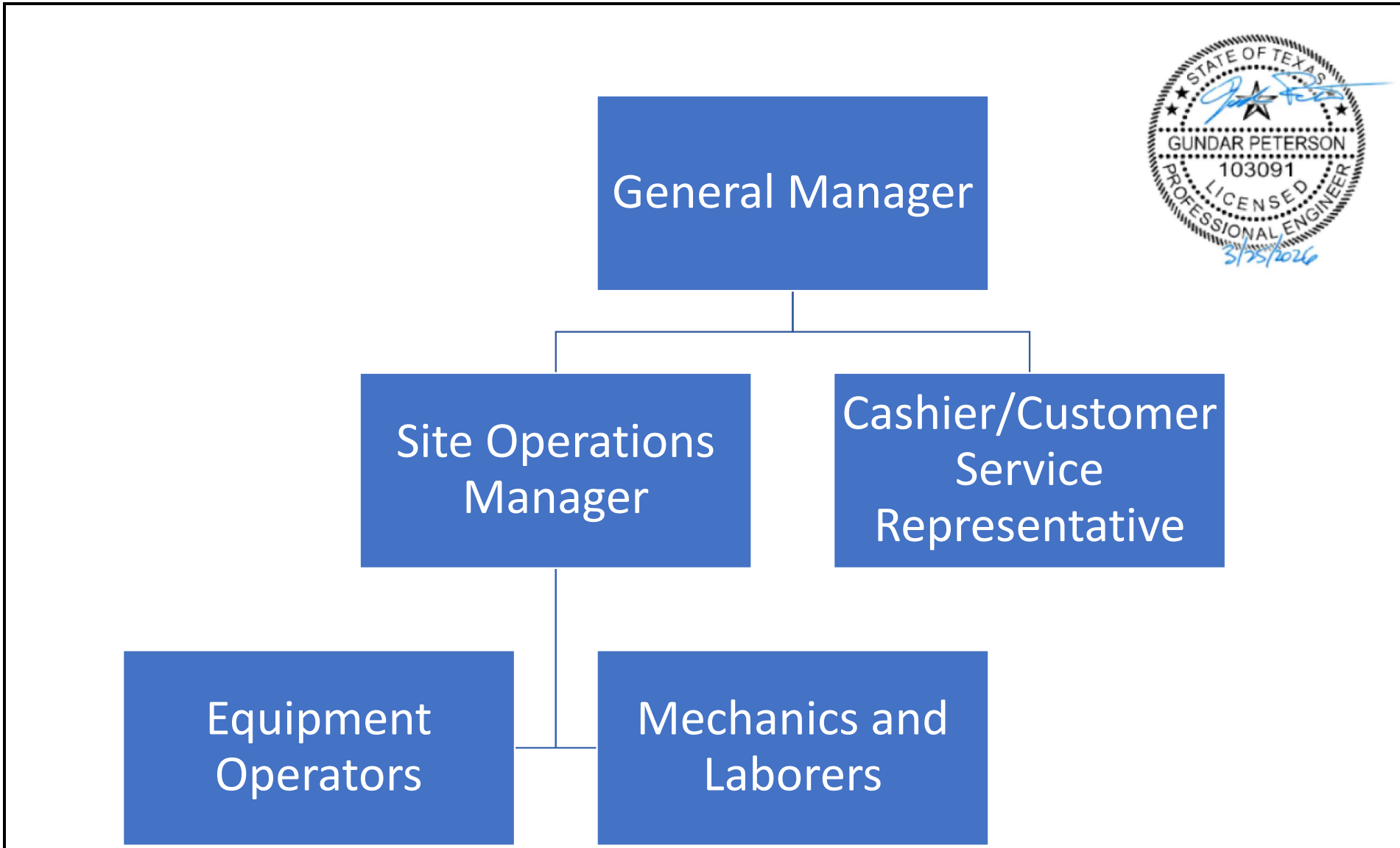

Figure IV-1

WST LANDFILL
Organizational Chart

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Attachment IV-1

Contingency Plan

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1. Introduction

This Contingency Plan for the WST Landfill has been developed to minimize possible hazards to human health and the environment from fires, explosions, and any unplanned sudden or non-sudden releases of waste or waste constituents. This plan meets the requirements outlined in 30 TAC 335.589. This document describes the sequences, procedures, and requirements to be implemented to protect workers and the public from exposure to releases or spills that may cause an imminent and substantial danger to present or future public health and safety or the environment. The provisions of this plan shall be executed immediately upon discovery of any incident or existing situation that may pose any of the aforementioned threats.

A copy of this Contingency Plan and all revisions to the plan will be maintained at the landfill. The plan will be submitted to local police departments, fire departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services.

This Contingency Plan will be reviewed, and immediately updated, if necessary, whenever the facility permit is revised, the plan fails in an emergency or any changes are made to facility operations.

In addition, WST Landfill maintains a list of personnel qualified to act as emergency coordinator. The list indicates the primary emergency coordinator if two names are shown. This list is kept up-to-date and will be made available with this contingency plan at all times.

Routine cleanup operations shall be performed by operating personnel without implementing this contingency plan.

2. Implementing Criteria

At least one employee designated as the emergency coordinator (EC) will be on the facility premises or on call (available to respond to an emergency) with the responsibility for coordinating emergency response measures. The EC will be knowledgeable of all aspects of this contingency plan, all operations and activities at the facility, the facility layout, and the location of records within the facility. The EC will have the authority to commit the resources needed to carry out this Contingency Plan.

The decision to implement this Contingency Plan depends upon whether an existing or imminent situation may threaten human health or the environment. This section provides guidance to the EC when conditions warrant the need for a contingency action response. Emergencies may occur at any time as a result of carelessness, accidents such as spills or fires, natural forces, and other situations which disrupt normal operations. Some of the types of situations which may require the implementation of this Contingency Plan include:

- Serious on-site injury
- Fire
- Detection of explosive gases
- Release of hazardous materials

3. Emergency Preparedness

3.1 Emergency Coordinator

A list of names, addresses, and telephone numbers (office and home/cell) of all individuals qualified to act as EC is kept up-to-date in the landfill office.

In the event of an emergency, the EC (or designee) will immediately perform the following tasks, as appropriate:

1. Activate alarms or communication systems, where applicable, to notify all facility personnel.
2. Assess the extent of the emergency.
    - Identify the amount, character, source, and areal extent of any released materials. This can be performed by visual observation, a review of facility records or manifests, or, if necessary, chemical analysis.
    - Possible hazards to human health or the environment, both direct and indirect, that may result from the release, fire, or explosion will be assessed. This assessment will include the effects of any irritating or asphyxiating gases that may have been generated, or the effects of any water runoff used to control fire and/or heat-induced explosions.
3. Contact appropriate emergency support agencies as needed.
4. If the incident may threaten human health or the environment outside of the facility boundaries, and if the EC's assessment indicates that evacuation of local areas may be

advisable, the EC (or designee) will immediately notify the appropriate local authorities and will be available to help local officials in making the final determination.

5. If any oil, chemical, radiological, biological, or etiological discharges are suspected, the EC will notify the National Response Center (see Table 1) with the following information:
   - Name and telephone number of reporter
   - Name and address of the facility
   - Time and type of the incident (e.g., release, fire)
   - Name and quantity of material(s) involved, to the extent known
   - The extent of injuries, if any
   - The possible hazards to human health, or environment, including any outside the facility

Table 1. Example List of Emergency Coordinators

Notification Priority	Employee Title	Employee Name	Mobile Phone	Office Phone	Address
1	General Manager				
2	Site Operations Manager				
3	Equipment Operator				

Note: Emergency coordinators are assigned by position and not by name. Names given are for the current landfill employee holding that position, and should personnel assignments change, the replacement personnel shall be trained and assume the emergency team position listed for their title.

6. If necessary, the EC will designate an employee to be in charge at the incident area to temporarily supervise immediate control action and to provide updates to the EC on conditions.
7. All reasonable precautions will be taken to prevent the spread of fire or other emergency conditions. These measures may include, where applicable, stopping the receipt of incoming waste or compaction operations, collecting and containing any released waste material, and removing or isolating containers.
8. If the facility must cease operations in response to an emergency, the EC will monitor for leaks, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

9. Evacuate non-essential personnel from the incident area.
10. Assemble all landfill personnel at a designated area for instructions and to perform a personnel count. Instruct any personnel that are assisting in the response on procedures to mitigate the fire or explosion, if appropriate, and/or wait for emergency personnel to arrive. Upon arrival of emergency personnel, assist in their efforts.
11. Prevent additional traffic from entering the incident area.
12. Clear road(s) for the safe passage of emergency vehicles and equipment.
13. Determine the need to evacuate the site based on evaluation of the following:
    - The areal extent of the incident
    - The nature of waste involved
    - Weather conditions (most notably wind)
    - An estimate of the time required and equipment needed to bring the incident under control
    - Any other special conditions or factors that may impact the severity of the incident
14. In the event of a fire, consider smoke visibility in off-site areas. Advise the responding fire department personnel appropriately.
15. For incidents requiring local traffic control, contact the Reeves County Sheriff's Department to coordinate activities, if necessary.
16. Immediately after the incident, make an assessment to determine the need for disposing of recovered waste, contaminated water, or any other materials used to control the incident at the facility. WST will classify all recovered waste, contaminated soil or water, or any other material that results from a release, fire, or explosion at the facility.
17. Evaluate the nature of materials (such as fire suppressants, neutralizing agents, waste residuals) used in the incident area to determine if special cleanup efforts must be initiated before operation of the facility is resumed.
18. Ensure that all emergency equipment listed below is cleaned and fit for its intended use before facility operations are resumed.
19. Ensure that no waste that may be incompatible with the released material is treated, stored, or disposed of in the area of the incident until cleanup procedures are completed.

3.2 Emergency Equipment

The following list of emergency equipment will be kept at the facility and maintained at all times in operable condition.

- Fire extinguishers: On all equipment, near fueling station and Citizen Collection Station and other locations as deemed relevant by WST.
- Cat D7 (or similar) for soil covering of working face in the event of fire
- Water truck: At maintenance building when not in use to assist in fire fighting
- Eye wash and other first aid supplies: At scale house or maintenance shed
- Level D Personal protective equipment: At scale house or maintenance shed

Inspect fire extinguishers for general condition and proper operation annually at a minimum. Replace or refill as needed.

3.3 Emergency Actions

In the event of an emergency, WST will perform the following tasks:

1. Notify TCEQ and appropriate state and local authorities that the facility has or will assess the need for disposing of recovered waste, contaminated water, or any other materials used to control the incident.
2. Place a note in the operating record of the time, date, and details of any incident that requires implementing this contingency plan. Within 15 days after the incident, WST will submit a written report on the incident to TCEQ. The report will include the following:
    - Name, address, and telephone number of the owner or operator
    - Name, address, and telephone number of the facility
    - Date, time, and type of incident (ex. fire, explosion)
    - Name and quantity of material(s) involved
    - The extent of injuries, if any
    - An assessment of actual or potential hazards to human health or the environment, where applicable
    - Estimated quantity and disposition of recovered material that resulted from the incident

3.4 Coordination with Local Authorities

WST will maintain contact with local police and fire departments, hospitals, emergency contractors, equipment suppliers, and state and local emergency response teams. Maintaining relations with these providers will assist WST in coordinating emergency services if needed. A copy of this contingency plan will be provided to local emergency personnel and WST will familiarize them with the layout of the facility, properties of the waste handled and potential hazards, places where facility personnel normally would be working, entrances to and inside the facility, and possible evacuation routes. See Table 2 for a list of emergency contacts. This list will be updated as information changes.

Table 2. List of Emergency Contacts

Service Provider	Primary Phone Number	Secondary Phone Number	Address
Pecos Police Department	911	(432) 445-4911	172 Raul Florez Blvd. Pecos, TX 79772
Fire/EMS - Reeves County Emergency Services District No. 1 & 2	911	(432) 447-1966	2269 Ocotillo Dr. Pecos, TX 79772
Reeves County Sheriff	911	(432) 445-4901	500 South Oak St. Pecos, TX 79772
Reeves Regional Health	911	(432) 447-3551	2349 Texas St. Pecos, TX 79772
Reeves County Emergency Management Office	(432) 287-0242	(432) 231-9691	1714 Schmidt Dr RM 326, Pecos, TX 79772
State of Texas Spill Reporting Hotline/State Emergency Response Commission	(800) 832-8224	—	—
TCEQ Region 7 (Midland) Office	(432) 570-1359	—	10 Desta Drive Suite 350E Midland, TX 79705
National Response Center	(800) 424-8802	—	—

4. Emergency Response

4.1 Notification Procedures

Should an emergency situation arise, the EC will be notified immediately. The EC will then contact the appropriate personnel and authorities.

Emergency services may be obtained by dialing 911.

4.2 On-Site Personal Injury

The primary on-site injuries that may occur at the landfill are the following:

- Accidents involving the use of heavy machinery
- Asphyxiation caused by entrance into confined spaces or excavation
- Fire and explosion injuries
- Minor cuts, scrapes, and bruises
- Injuries due to slipping and falling

Training on the prevention of injuries will be provided by WST to help minimize and prevent many of these injuries. Should a serious, or potentially serious, injury occurs at or near the site, the assisting personnel will decide whether immediate first aid is required. The EC will be contacted for help in making this determination, if needed. If confined space is involved, the assisting personnel should not enter the confined space until the situation has been corrected or a corrective action has been taken to assure the health and safety of all involved.

If immediate first aid is required, it will be given to the injured person. If possible, the assisting personnel or other available personnel will contact the EC for additional help (e.g., ambulance, fire department) as needed.

If the injury is not serious and only requires minor first aid, first aid kits will be available at the scale house or maintenance shed. All injuries, minor or serious, will be reported to the EC for injury records and to receive further instruction. The incident will be reviewed to determine if any actions are needed to prevent or minimize the potential for this type of injury.

4.3 Fire or Explosion

Upon discovery of a fire or explosion at or near the facility, the EC will contact the necessary personnel to mitigate the fire. This may include employees trained in the proper methods of firefighting and/or other emergency response personnel. All untrained personnel will be required to vacate the area of the incident. In addition, the EC will direct all cleanup operations, determine the proper level of personal protective equipment, and decide on the appropriate cleanup materials. Specific Information regarding fire prevention and general rules for fire-fighting is contained in Section 5 (Fire Protection Plan) of the Site Operating Plan (SOP).

Regardless of the location of the fire or explosion, the EC is responsible for:

- Determining any environmental impact potential.
- Determining any potential threats to surrounding areas of the facility or adjacent properties.
- Determining any life-threatening potential.

Upon discovery of a fire or explosion, landfill personnel will initiate the fire/explosion action procedures as described below:

1. Notify the emergency coordinator (EC) or designee. (Note: Home and office phone numbers will be included on a list and kept with this Contingency Plan and be prominently displayed on signs at the facility.)
    - ◇ The EC or designee will subsequently notify local emergency personnel and other appropriate emergency response agencies, as necessary.
2. Control access to the area. Evacuate any haulers and patrons from the area. Clear all non-essential personnel from the incident area.
3. Extinguish fire with available equipment, if possible, or take other immediate action to mitigate the emergency (e.g., isolate the fire) until emergency response personnel arrive.
4. Take all reasonable measures necessary to ensure that fires, explosions, or releases do not occur or spread to other areas. These measures will include, but not be limited to, the removal of unaffected equipment from the area, separation of affected and unaffected wastes, and dowsing adjacent areas with water or other suppressants. Water may not be effective on burning waste at the active face and smothering with soil may be a better alternative.

4.4 Release of Prohibited or Hazardous Material

Access to and use of the facility will be strictly and continuously controlled by fencing, gates, and signs. Training of facility personnel includes the identification of prohibited or hazardous waste. If prohibited or hazardous waste is detected prior to unloading, it will be immediately rejected. WST facility personnel will then contact the Operations Manager and identify the hauler involved. Action shall be taken to ensure that the incident does not reoccur.

If prohibited waste is inadvertently disposed of on-site, every effort will be made to identify the hauler involved, and measures will be taken to handle the waste in an appropriate manner. These measures may include, but are not limited to, removal of the waste by the hauler and assessment of a surcharge to pay for the removal of the waste by the generator. It may be necessary to segregate the waste until a thorough assessment is conducted.

In the unlikely event that hazardous or prohibited waste which is considered a threat to human health and the environment is delivered to or spilled at the facility, WST will implement the following procedures:

- The emergency coordinator will be immediately notified of the discharge.
- TCEQ will be contacted and informed of the facility location and spill description.
- If necessary, berms shall be constructed to prevent the spill, or discharge, from spreading.
- All discharged material will be collected, handled and disposed of properly.

4.5 General Spill Cleanup Procedures

On-site spill cleanup is aimed at recovering as much of the spilled material as possible for disposal as quickly as possible to minimize any hazards to human health and the environment. There are several techniques available for on-site cleanup. Choice of a cleanup method must be determined at the time of the incident considering the extent of the spill.

All waste generated from cleanups involving waste material shall be collected and disposed of according to its characteristics. Any equipment used in collecting waste material shall be decontaminated prior to use elsewhere. Any liquid generated from decontamination procedures will be collected for proper disposal. Some cleanup alternatives include the following:

- Sorbents: Spill scavengers and cleanup agents that absorb the spilled product are the most common method for handling spills or residual product. These agents may be packaged in

pillows, large bats, or booms which may absorb a large amount of liquid and allow for easier disposal. For corrosive materials, lime or other neutralizers are practical. Three classes of sorbents are natural products (straw, sawdust, clays, and vermiculite), modified natural products (expanded perlite, cloth rags, charcoal, and silicon-coated sawdust), and synthetic products (imbiber beads, imbiber bead blankets, and foam products). When using sorbents, it is necessary to dispose of spent products properly, unless recoverable sorbents are used.

- Direct suction pumping in tank trucks or similar.
- Removal: This is an initial, rapid response method for the removal of a contaminants before it migrates. Soil and any waste that is excavated from an incident site will be properly disposed of.

4.6 Evacuation Procedures

If the EC determines that an incident warrants evacuation of the facility, the EC (or designee) will notify site personnel of evacuation of a specific area of the facility or complete evacuation of the facility by using cellular telephones, radios or other means. All personnel in the immediate area of an evacuation will be required to leave the area immediately and report to a designated area away from the incident. Site personnel will be familiar with the designated meeting area to ensure safe and efficient evacuation in case of an emergency. Upon gathering at this designated area, a head count will be taken of the employees. If any personnel are unaccounted for, the names of those employees and their last known location will be reported to the EC immediately. Further evacuation procedures shall be implemented in accordance with direction received from the EC.

Attachment IV-2

Waste Inspection Form

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Waste Inspection Form

Date and Time of Inspection	
Name of Driver and Hauling Company	
Contact Phone Number	
Type of Vehicle	
License Plate Number	
Size and Source of Load	
Contents of Load	
Indicators of Prohibited Wastes	
Results of the Inspection	

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Attachment IV-3

Daily Facility Inspection Form

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WST Landfill Daily Inspection Form
Page 1 of 2

Date and Time of Inspection: _____

Completed By: _____

Item	Inspected	Notes
Run-on/runoff control systems are functioning and prevent water from entering or leaving active trench areas	**Yes No**	
On-site ponding outside stormwater systems	**Yes No**	
On-site litter - windblown waste collection and clean-up, waste materials along route to site	**Yes No**	
Breaches in cover or fill	**Yes No**	
Threats to public health and safety and the environment	**Yes No**	
Access gates, fences, and signs are maintained (including entrance sign)	**Yes No**	
Boundary posts, monuments, and benchmarks	**Yes No**	
Perimeter fence/berm and gate inspections	**Yes No**	
Roads are maintained	**Yes No**	
Dust suppression	**Yes No**	

WST Landfill Daily Inspection Form
Page 2 of 2

Item	Inspected	Notes
Landfill area is free of wind-blown debris	**Yes No**	
Suspect vehicles and periodic loads are being inspected	**Yes No**	
Waste handling procedures are followed	**Yes No**	
Unloading area minimization	**Yes No**	
Wastes are sufficiently compacted	**Yes No**	
Daily Cover or ADC correctly applied	**Yes No**	
Erosion gullies or washed-out areas deep enough to jeopardize the final or intermediate cover.	**Yes No**	