LIMITED SCOPE MAJOR PERMIT AMENDMENT APPLICATION -

ACCEPTANCE OF RACM

Prepared for

City of Grand Prairie

November 2024

Revised February 2025

02/07/2025

Prepared by

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109 817-735-9770



February 7, 2025 Project No. 0628-001-11-77-03

Christopher Gajewski Municipal Solid Waste Permits Section, MC-124 Texas Commission on Environmental Quality P. O. Box 13087 Austin, Texas 78711-3087

Re: Response to Technical Notice of Deficiency Letter Limited Scope Major Permit Amendment Application – RACM Acceptance City of Grand Prairie Landfill – TCEQ Permit No. MSW-996C Dallas County, Texas RN100542216/CN600253967 Tracking No. 30439686

Dear Mr. Gajewski:

On behalf of the City of Grand Prairie, please find enclosed one original and one copy of the replacement pages for the Limited Scope Major Permit Amendment – RACM Acceptance application initially submitted on November 13, 2024. The attached replacement pages were developed to incorporate your comments included in your email dated January 10, 2025. The enclosed table contains TCEQ's NOD1 comments, and a response is provided below each comment. To facilitate your review, the enclosed revisions were made to the unmarked version of the initial submittal referenced above, and only replacement pages are included.

A copy of this submittal was sent to <u>mswper@tceq.texas.gov</u>. The appropriate regional office and library have been provided with a copy of this submittal, and a copy of this submittal was placed in the site operating record.

If you need additional information or have any questions, please call.

Sincerely, Weaver Consultants Group, LLC

te al to

Nevzat Turan, P.E. Principal

- Attachments:Attachment 1: NOD1 Table with ResponsesAttachment 2: Replacement Pages (Redline/Strikeout Version)Attachment 3: Replacement Pages (Unmarked Version)
- cc: TCEQ Region 4 Office, Waste Section Manager City of Grand Prairie Public Library Patricia D. B. Redfearn, PhD., City of Grand Prairie

ATTACHMENT 1

NOD1 TABLE WITH RESPONSES

Municipal Solid Waste Limited Scope Permit Amendment No. 996C City of Grand Prairie Landfill First Notice of Technical Deficiency

NOD ID	App. Part	Citation	Location	1st NOD Type	NOD Description
1	Part I and Part II	330.3(22), (23), and (24)	Part I/II General Application Requirements, Section 2.1.2	Consistency Change the Roman numerals to Arabic numerals to be consistent with the rest of the application. Response: Part I/II, Section 2.1.2, p. I/II-2-3 has been updated to Arabic numerals for the waste electrications.	
2	Part IV	330.3(22), (23), and (24)	Part IV Site Operating Plan, Section 4.2.2	Consistency Change the Roman numerals to Arabic numerals to be consistent with the rest of the application. Response: Part I/II, Section 2.1.2, p. I/II-2-3 has been updated to Arabic numerals for the waste classifications.	
3	Part IV	330.171(c)(3)	Part IV Site Operating Plan, Section 4.20.5, Page IV-36	Clarity	Revise to acknowledge that because regulated asbestos-containing material (RACM) may be disposed at any location in the landfill, the entire landfill will be treated as containing RACM, and that notification of potential asbestos disturbance will be provided when there will be disturbance in any part of the landfill.
					Response: Part IV, Section 4.20.5, p. IV-36c – A paragraph has been added to indicate that during the active life and postclosure period, any activity that will involve disturbance of previously deposited waste, regardless of originally documented RACM disposal location, a potential disturbance of RACM will be submitted to TCEQ MSW Permits Section. These activities will include but are not limited to landfill gas extraction well drilling.
4	Part IV	330.171(c)(3)(A) and (B)	Part IV Site Operating Plan, Section 4.20.5, Page IV-36	Completeness	Add language indicating that a new site diagram identifying the RACM area will be submitted to the executive director immediately upon completion of the diagram, each time a new area is designated.
					Response: Part IV, Section 4.20.5, p. IV-36a – One bullet was added indicating an RPLS will survey and mark each RACM disposal location and will identify this location on a current site drawing, which will be maintained at the site. Another bullet was added stating that immediately upon placement

NOD ID	App. Part	Citation	Location	1st NOD Type	1st NOD Type NOD Description	
					of RACM, the site will submit a letter to the TCEQ executive director (MSW Permits Section) to certify RACM was placed in an acceptable area and disposed of following the procedures in Section 4.20.5.	
					Regarding completing the site diagram, text was added to the last bullet, which now states: Following disposal of RACM, the site will submit a written notification of RACM placement as well as a site diagram identifying the RACM area to the executive director (MSW Permits Section) no later than the 25th day of the month following the month the RACM was received.	
5	Part IV	330.171(c)(3)(G)	Part IV Site Operating Plan, Section 4.20.5, Page IV-36a, third bullet	Clarity	Delete the word "promptly" from the latter part of the bullet to clarify that RACM must be covered immediately, as stated at the beginning of the bullet.	
					Response: Part IV, Section 4.20.5, p. IV-36a – "Promptly" has been revised to	
6	Part IV	330.173(h)	Part IV Site Operating Plan, Section 4.20.5, Page IV-36a, fifth bullet	Clarity	Revise to state monthly reports must be submitted because Class 1 wastes are received including those months in which no Class 1 waste is received at the facility.	
					Response: Part IV, Section 4.20.5, p. IV-36a – The last bullet is revised to indicate the facility is required to submit monthly Class 1 waste acceptance reports required by 30 TAC §330.173(h), including months in which no Class 1 waste was received at the facility.	
7	Part IV	330.173	Part IV Site Operating Plan, Section 4.20.5, Page IV-36a, numbered list	Clarity	Clarify that list item 1, regarding manifests, refers to RACM from industrial sources. If the facility will not accept RACM from industrial sources, then for clarity, delete the first item in the list regarding manifest for Class 1 RACM.	
					Response: The facility is not expected to receive any RACM from industrial sources; however, it was left in the plan just in case in an unlikely event it is required for industrial waste sources from Grand Prairie proper. Additional revisions made to Section 4.20.5 on page 36 provide further clarification.	

NOD ID	App. Part	Citation	Location	1st NOD Type	NOD Description
8	Part IV	330.171(c)(3)(H)	Part IV Site Operating Plan, Section 4.20.5, Page IV-36b, sixth bullet	Clarity	Revise to clarify whether the removed water would be transported only to a privately-owned wastewater treatment plant, of if it may also be transported to a publicly-owned wastewater treatment plant (POTW).
					Response: Part IV, Section 4.20.5, p. IV-36b – The bullet has been revised and now states the following: Any water pooling from wetting down the spilled material will be removed with a vacuum truck. The removed water will be direct discharged to a sewer line via the existing permitted sewer connection's loading manhole or transported to a properly permitted privately or publicly owned off-site wastewater treatment facility (POTW).
9	Part IV	330.171(c)(3)(C)	Part IV Site Operating Plan, Section 4.20.5, Page IV-36b, last paragraph	Clarity	Revise to clarify in the notation in the deed records that the facility accepted RACM. The associated diagram must indicate all areas where RACM was placed, or alternatively, indicate that all areas of landfill potentially contain RACM.
					Response: Part IV, Section 4.20.5, p. IV-36c – Text updated to indicate upon closure of the facility, a notation will be placed in the deed property records of Dallas County indicating that the site accepted RACM. This notation will include a diagram indicating all areas where RACM was disposed of on the property, or alternatively, all areas where the landfill could potentially contain RACM. A copy of this documentation will be provided to TCEQ.

ATTACHMENT 2

REPLACEMENT PAGES (REDLINE/STRIKEOUT VERSION)

CORE DATA FORM, TCEQ PART I APPLICATION FORM, TCEQ PLAIN LANGUAGE SUMMARY FORMS, AND PUBLIC INVOLVEMENT PLAN FORM

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006 Revised December 2008 Revised November 2024

Revised February 2025



Prepared by

Weaver Consultants Group, LLC TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109

817-735-9770



Texas Commission on Environmental Quality Part I Application Form for New Permit, Permit Amendment, or Registration for a Municipal Solid Waste Facility

Instructions for completing this Part I Application Form are provided in TCEQ 00650-instr¹. Include a Core Data Form (TCEQ 10400)² with the application for the facility owner, and Core Data Forms for the operator and property owner if different from the facility owner. If you have questions, contact the Municipal Solid Waste (MSW) Permits Section by email to mswper@tceq.texas.gov, or by phone at 512-239-2335. Rules cited on this form are in Title 30 Texas Administrative Code (30 TAC) and may be viewed online at www.tceq.texas.gov/goto/view-30tac.

Application Tracking Information

Facility Regulated Entity Name³: City of Grand Prairie Landfill

Site Operator (Permittee or Registrant Name)⁴: City of Grand Prairie

MSW Authorization Number: MSW-996C

Initial Submission Date: 11/13/2024

Revision Date: 02/2025

Application Data

1. Submission Type	
Initial Submission	Notice of Deficiency (NOD) Response

2. Authorization Type	
Permit	Registration

3. Application Type			
New Permit			
🗌 Permit Major Amendment	🗌 Permit Major Amendment 🛛 🔳 Permit Limited Scope Major Amendment		
New Registration			

¹ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf

² www.tceq.texas.gov/goto/coredata

³ Facility Regulated Entity Name must match the Regulated Entity Name indicated on the TCEQ Core Data Form.

⁴ Site Operator is defined in 30 TAC 330.3(148) as the holder of, or the applicant for, an authorization (or license) for a municipal solid waste facility.

Applicant Signature Page

Site Operator (Permittee or Registrant Name) or Authorized Signatory

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:Patricia D.B. Redfearn, Ph.D.	Title: Director of Solid Waste & Recycling
Email Address: predfearn@gptx.org	
Signature: <u>Ratrician B Kedfla</u>	Date: 2/7/2025

Authorization by Facility Owner for Operator to Submit Application

To be completed by the facility owner if the application is submitted by an operator who is not the facility owner.

	I am the owner of the facility that is the subject of this applicat operator,to pursuant to 30 TAC 305.43(c).	tion, and authorize the o submit this application
	Name: Title:	
	Email Address:	
	Signature: Da	ate:
	Notary SUBSCRIBED AND SWORN to before me by the said	reia DB Rastearn
	On this _7_ day of Jebaury , 2025	
	My commission expires on the $\underline{\mathscr{B}}$ day of $\underline{\mathscr{Suly}}$, $\underline{\mathscr{202}}$	15
2	Notary Public in and for <i>Hand Mairie</i> , Dallas County Ty (notary's jurisdiction	n, including county and state)
	Note: Application Must Bear Signature & Seal of Notary Public	



Property Owner Affidavit

Property Owner Affidavit for Landfill Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure and post-closure care of the facility. For a facility where waste will remain after closure, I acknowledge that I have a responsibility to file with the county deed records an affidavit to the public advising that the land will be used for a solid waste facility prior to the time that the facility actually begins operating as a municipal solid waste landfill facility, and to file a final recording upon completion of disposal operations and closure of the landfill units according to 30 TAC 330.19 (relating to Deed Recordation). I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name: Patricia I	D.B. Redfearn, Ph.D.	÷	
Email Address:	predfearn@gptx.org		
Signature:	Ratricia DB Redfan	Date:	2/7/2025

Property Owner Affidavit for Processing Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure of the facility. I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name:	
Email Address:	
Signature:	Date:
Notary SUBSCRIBED AND SWORN to before me by the said	Princia DB Real Pearn
On this 7 day of Sebruary, 2025	
My commission expires on the <u>B</u> day of J_{0}/y	, <u>2025</u>
Locario D. Charley	
Notary Public in and for Chand Tailine, Dallas County, Ta (notary's juri	isdiction, including county and state)
Note: Application Must Bear Signature & Seal of Notary	Public



PARTS I/II GENERAL APPLICATION REQUIREMENTS

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006 Revised August 2009 Revised August 2014 Revised November 2024

Revised February 2025



Prepared by

02/07/2025

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109 817-735-9770

2.1.2 Properties and Characteristics of Waste

The major classifications of solid waste to be accepted at the City of Grand Prairie Landfill include household waste, yard waste, commercial waste, regulated asbestos-containing material (RACM), industrial waste (nonhazardous), construction-demolition waste, and some special wastes. Each classification of waste is defined by §330.2 as follows:

- **Household Waste:** Any solid waste (including garbage, trash, and sanitary waste in septic tanks) derived from households (including single and multiple residences, hotels, motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreation areas); does not include yard waste or brush that is completely free of any household wastes.
- **Yard Waste:** Leaves, grass clippings, yard and garden debris, and brush, including clean woody vegetative material not greater than 6 inches in diameter, that results from landscaping maintenance and land-clearing operations. The term does not include stumps, roots, or shrubs with intact root balls.
- **Commercial Solid Waste:** All types of solid waste generated by stores, offices, restaurants, warehouses, and other nonmanufacturing activities, excluding residential and industrial wastes.
- **RACM** Friable asbestos-containing material (ACM), Category I nonfriable ACM that has become friable, Category I nonfriable ACM that has or will be subjected to sanding, grinding, cutting, or abrading, or Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations. In accordance with 30 TAC §330.173(c), the facility will accept waste defined as Class 1 only due to RACM content.
- **Industrial Waste (Nonhazardous):** Solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations, classified as follows:
 - Class H2 Industrial Solid Waste any individual solid waste or combination of industrial solid wastes that cannot be described as Class H1 or Class H13, as defined in §335.506 (relating to Class H2 waste determination).
 - Class III3 Industrial Solid Waste any inert and essentially insoluble industrial solid waste, including materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc. that are not readily decomposable as defined in §335.507 (relating to Class III3 waste determination).
- **Construction-Demolition Waste:** Waste resulting from construction or demolition projects; includes all materials that are directly or indirectly the by-products of construction work or that result from demolition of buildings and other structures, including but not limited to, paper, cartons, gypsum board, wood, wood shavings, rubber, and plastics.

• **Special Wastes:** Any solid waste or combination of solid wastes that because of its quantity, concentration, physical or chemical characteristics, or biological properties requires special handling and disposal to protect human health or the environment. If improperly handled, transported, stored, processed, or disposed of, or otherwise managed, it may pose a present or potential danger to human health or the environment.

Consistent with §330.5 the facility will not accept Class ¹1 non-hazardous industrial waste (non-hazardous), regulated hazardous waste, PCBs, infectious medical wastes, or other wastes prohibited by TCEQ regulations.

2.1.3 Solid Waste Containment System

The design objective of the containment system (final cover, liner, and leachate management systems) is to isolate the solid waste and remove leachate (defined as water that has contacted solid waste) that may collect on the liner system. The liner system proposed for the City of Grand Prairie Landfill (floor grades) is shown in Figure 2.1. The liner system design also includes an underdrain system for liner construction below highest measured groundwater elevations. Excavation side slopes will include a 3-foot thick compacted clay liner overlain a 2-foot thick



Figure 2.1 The liner and cover systems are designed to meet or exceed all state and federal regulations.

protective cover layer. Design information and the required QA/QC construction procedures for the individual components of the containment system are presented in Part III of this application. In addition to the above, an existing slurry wall is located around the Subtitle D portion of the site as discussed in Section 3.

2.1.4 Site Development Plan

The site development plan (SDP) is included in Part III in this application. This plan sets forth the overall design and operating characteristics of the landfill. Drawings showing the proposed landfill configuration during site development are presented in Part III, Attachment 1 - Site Layout Plans. A summary of the landfill configuration is provided below.

• With this expansion, the existing limits of waste and the excavation plan will be the same as the currently permitted design. The currently permitted limits of waste and excavation plan are shown on Figure I/II-3.2. This excavation plan was approved by TCEQ in February 2003. This expansion only involves an increase in the permitted fill height, and does not revise the currently permitted excavation plan and limits of waste for this facility. The permit boundary of the municipal solid waste landfill encompasses 178.05 acres (see Section 13 for detailed legal description). The area available for solid waste fill is about 143.6-acres.

PART III - SITE DEVELOPMENT PLAN SITE DEVELOPMENT PLAN NARRATIVE

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006

Revision 24 Revised November 2024

Revised February 2025



Prepared by

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109 817-735-9770

The major classifications of solid waste to be accepted by this facility for disposal include both residential MSW and commercial MSW. Such waste consists of household wastes, construction-demolition waste, and various nonhazardous industrial and special wastes as authorized by the TCEQ. Regulated asbestos-containing material (RACM) as defined in 40 CFR §61.141 will be accepted as detailed in Part IV – Site Operating Plan, Section 4.20.5 – Regulated Asbestos-Containing Material. In accordance with 30 TAC §330.173(c), the facility will accept waste defined as Class 1 only due to RACM content. Consistent with §330.5, the site will not accept regulated hazardous wastes, Class 1 nonhazardous industrial waste, PCBs, infectious medical wastes, or other wastes prohibited by TCEQ regulations. Waste classifications are provided in Parts I/II, Section 2.1.2 – Properties and Characteristics of Waste.

PART IV – SITE OPERATING PLAN

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006 Revised March 2010 Revised November 2015 Revised February 2018 Revised June 2019 Revised November 2024

Revised February 2025

NEVZAT TURAN 84059 02/07/2025

Prepared by

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Blvd., Suite 206 Fort Worth, Texas 76109 817-735-9770



CONTENTS (Continued)

02/07/2025

4.8	Control of Waste Spilled on Route to the Site	IV-21
4.9	Disposal of Large Items	IV-22
4.10	Air Quality and Odor Management Plan	IV-22
4.11	Disease Vector Control	IV-24
4.12	Maintenance of Site Access	IV-25
4.13	Salvaging and Scavenging	IV-26
4.14	Endangered Species	IV-26
4.15	Landfill Gas Control	IV-26
4.16	Oil, Gas, and Water Wells	IV-27
4.17	Compaction of Solid Waste	IV-28
4.18	Soil Management, Placement, and Compaction of Daily,	
	Intermediate, and Final Cover	IV-28
	4.18.1 Soil Management	IV-28
	4.18.2 Daily Cover	IV-29
	4.18.3 Intermediate Cover	IV-31
	4.18.4 Final Cover	IV-31
	4.18.5 Cover Application Log	IV-32
4.19	Prevention of Ponded Water	IV-32
4.20	Disposal of Special Wastes	IV-33
	4.20.1 Sludges	IV-35
	4.20.2 Dead Animals	IV-35
	4.20.3 Empty Containers	IV-35
	4.20.4 Nonregulated Asbestos-Containing Materials	IV-35
	4.20.5 Regulated Asbestos-Containing Materials	IV-36
	4.20.6 Industrial Waste	IV-36c
4.21	Prevention of Discharge of Contaminated Water	IV-36c
4.22	Leachate and Contaminated Water Plan	IV-36d
4.23	Site Inspection and Maintenance List	IV-37
4.24	Visual Screening of Daily Operations	IV-38
SEQU	ENCE OF DEVELOPMENT	IV-39
DETE	CTION AND PREVENTION OF DISPOSAL OF PROHIBIT	TED
WAST	TES	IV-40
6.1	General	IV-40
6.2	Load Inspection Procedure	IV-41
6.3	Recordkeeping	IV-43
6.4	Training	IV-43
6.5	Managing Prohibited Wastes	IV-44
6.6	Managing Mishandled or Undeclared Special Waste	IV-44
	-	

5

6

Weaver Consultants Group, LLC Rev. 2, 27/25 Site Operating Plan

4.2 Unloading Wastes

4.2.1 Unloading Areas

The City of Grand Prairie Landfill accepts general municipal solid wastes as well as brush, rubbish, construction/demolition waste, and certain special wastes outlined in Section 4.20 of this SOP. Wastes are disposed of or processed at the following two unloading areas at the City of Grand Prairie Landfill.

- MSW Unloading Area or Working Face. The vast majority of all wastes accepted at this facility are disposed of at the working face. The working face includes areas where waste has been deposited for disposal but has not been covered with soil.
- Citizens Convenience Center. This unloading area is used to store large item/white goods and other recyclables. Also, this area may be used to store wood waste, wood chips, concrete rubble, and roll-offs for the Citizens Convenience Center.

4.2.2 Waste Excluded from Disposal at the Site

The following wastes are specifically excluded from disposal at the site:

- Regulated hazardous wastes (refer to Section 6 for more information)
- Liquid wastes that do not pass the paint filter test
- Articles, equipment and clothing containing or contaminated with PCBs (refer to Section 6 for more information)
- Grease trap wastes
- Class <u>1</u> Non-hazardous Industrial Wastes (non-hazardous) (refer to Section 4.20.5)
- Waste prohibited by the TCEQ (see 30 TAC §330.15(e))

4.2.3 Waste Unloading Procedures

Office Assistants, Equipment Operators, Spotters, and Laborers will monitor the incoming waste for each of the unloading areas. Office Assistants control site access and monitor incoming vehicles for unauthorized wastes by (1) receiving manifests and other

disposed of by any other means by which the material could be crumbled into a friable state.

4.20.5 Regulated Asbestos-Containing Materials

Regulated Asbestos-Containing Materials (RACM) may be accepted at the facility in accordance with Title 30 TAC 330.171(c)(3). This section outlines processes and procedures for acceptance and disposal of RACM.

Prior to acceptance of Class 1 RACM, the site will request and review a waste profile from the RACM generator. Class 1 RACM is Class 1 waste only due to RACM content. RACM containing waste that is classified as Class 1 due to additional parameters will not be accepted. Once the Landfill Manager, or his designee, approves the waste profile for acceptance, the waste profile will be placed in the Site Operating Record. Each RACM shipment will be accompanied by a waste manifest. Upon receipt, the Landfill Manager, or his designee, will sign the manifest for pre-authorized RACM shipments for disposal and complete the destination section of each manifest. The manifests will be prepared in triplicate. The disposal facility copy will be filed in the Site Operating Record. One copy will be returned to the RACM delivery vehicle driver, and one copy will be returned to the waste generator within 30 days after receipt of the RACM. Acceptable manifests will include at least the following information:

- 1. Identity and telephone number of the generator;
- 2. Required information connecting the manifest to the pre-approved waste profile;
- 3. Description and quantity of waste delivered from the generator;
- 4. TCEQ registration number and TCEQ waste code (if applicable);
- 5. Landfill's name.

Disposal of RACM may occur at any location within the constructed Subtitle D landfill footprint as further described below. The site will document the volume of RACM and the disposal depth and location. The RACM disposal area will not be larger than 50 feet by 50 feet. A registered professional land surveyor (RPLS) will survey and mark each RACM disposal location and will identify this location on a current site drawing, which will be maintained at the site. This information will be submitted as a RACM placement notification to TCEQ, as explained in the RACM placement below.

The site will use the following criteria for RACM placement:

- The Landfill Manager, or his designee, will coordinate the delivery of RACM so that the waste arrives at a time that site personnel can properly manage it.
- RACM will be accepted at the site only if it is contained in tightly closed containers or bags or wrapped as necessary with 6-mil-thick polyethylene.
- During unloading and placement of RACM in the designated area(s), utmost care will be taken to prevent the bags or containers from breaking open.
- RACM will be placed in the constructed Subtitle D landfill sectors, such that it will not be subject to future exposure through erosion or weathering.

- RACM will be placed below natural grade where practical or possible.
- If placed above natural grade, the RACM will be placed at least 20 feet away from any exterior final side slopes and at least 10 feet below the final surface grade.
- RACM will not be placed within 20 feet of the edge of the adjacent pre-Subtitle D area.
- Immediately after RACM is placed in the landfill, one foot of soil cover or 3 feet of asbestos-free municipal solid waste will be promptly immediately placed over the RACM.
- Information and documents pertaining to RACM profiled for disposal and delivered to the landfill for disposal including, but not limited to, records concerning measurements and analyses performed at the site, will be retained in the Site Operating Record.
- A RPLS will survey and mark each RACM disposal location and will identify this location on a current site drawing, which will be maintained at the site.
- Immediately upon placement of RACM, the site will submit a letter to the TCEQ executive director (MSW Permits Section) to certify RACM was placed in an acceptable area and disposed of following the procedures in Section 4.20.5.
- Following disposal of RACM, the site will submit a written notification of RACM placement as well as a site diagram identifying the RACM area to the executive director (MSW Permits Section) no later than the 25th day of the month following the month the RACM was received. Since the site is not expected to receive RACM on a regular basis, approval of this SOP exempts the facility from being is required to submit monthly Class 1 waste acceptance reports required by 30 TAC §330.173(h), including months in which no Class 1 waste was received at the facility.

A waste discrepancy report will be completed when:

- 1. RACM arrives without a properly completed waste manifest;
- 2. RACM arrives and the waste material does not match the description on the waste manifest;
- 3. RACM arrives and the information on the manifest is determined to be incorrect; or
- 4. RACM arrives which does not match the information given in the waste profile submitted by the generator.

The facility will not accept or sign for shipments of Class 1 waste that is not RACM.

The Landfill Manager, or his designee, will attempt to resolve any waste discrepancies. If the discrepancy can be resolved, the waste may be accepted, and the discrepancy report will be filed with the shipping documents to document the resolution of the discrepancy. If the discrepancy cannot be resolved, the waste shipment will be rejected, and a

discrepancy report will be prepared and filed for the rejected waste shipment.

If delivered RACM is determined to be unauthorized waste, the site will follow the procedures within Section 6 – Detection and Prevention of Disposal of Prohibited Wastes.

In the event that RACM-containing bags or containers rupture at the working face, they will be immediately contained by spraying the area with water to prevent the spread of RACM. Also, earthen dikes, berms or other appropriate measures will be constructed to contain the spill. The Landfill Manager, or his designee, will be promptly notified of the spill and will coordinate the collection and disposal of the spilled RACM. The spilled RACM will be picked up mechanically or by employees wearing proper protective equipment and re-packaged for disposal. The spill response team will include the Landfill Manager and his designees, who have been trained to respond to RACM spills.

Specific procedures for the cleanup of the spill are outlined below.

- Personnel will take positions upwind of the RACM spill area during the cleanup procedures.
- Employees involved in cleanup will make use of the site's spill control kits, which may include: respirators, disposable coveralls, shoe covers, gloves, and safety glasses or goggles.
- Other site personnel will be directed away from the area until cleanup is complete.
- If the spill of RACM involves a reportable quantity (one pound or more), the National Response Center (NRC) must be notified by the Landfill Manager, or his designee.
- Emergency cleanup actions will include the following.
 - Utilize a water truck to wet down waste with water.
 - Excavate the waste material, place it into a properly labeled bag or a closed container, and dispose of it with the other RACM.
 - Wash any contaminated equipment or machinery.
 - Dispose of gloves, coveralls, and shoe covers in a tightly sealed 6 mil plastic bag.
 - Wash all other personal protective equipment with soap and water.
 - Check the respirator, refit it with new filter cartridges, and store it in a resealable, airtight container for future use.
- Any water pooling from wetting down the spilled material will be removed with a vacuum truck. The removed water will be direct discharged to a sewer line via the existing permitted sewer connection's loading manhole or transported to a properly permitted privately or publicly owned off-site wastewater treatment facility (POTW).

• Soil that has contacted the water used to wet down the RACM will be excavated and disposed of at the working face. The excavation of this material will occur immediately after the RACM has been removed.

During the active life and postclosure period, any activity that will involve disturbance of previously deposited waste, regardless of originally documented RACM disposal location, a potential disturbance of RACM will be submitted to TCEQ MSW Permits Section. These activities will include but are not limited to landfill gas extraction well drilling.

Upon closure of the facility, a notation will be placed in the deed property records of Dallas County indicating that the site accepted RACM will be placed in the deed property records of Dallas County. This notation will include a diagram indicateing all areas where the RACM was disposed of on the property, or alternatively, all areas where the landfill could potentially contain RACM. by showing its location on a site diagram. A copy of this documentation will be provided to TCEQ.

4.20.6 Industrial Waste

Class 1 RACM, Class 2, and Class 3 industrial solid wastes will be accepted at the facility. Industrial waste (nonhazardous) is defined by §330.3 as solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations, classified as follows:

- Class 1 RACM Industrial Solid Waste In accordance with 30 TAC §330.173(c), the facility will accept waste defined as Class 1 only due to RACM content.
- Class 2 Industrial Solid Waste any individual solid waste or combination of industrial solid wastes that cannot be described as Class 1 or Class 3, as defined in §335.506 (relating to Class 2 waste determination). Examples of Class 2 Industrial Waste include "plant trash" or waste originating in the facility offices or plant production areas that are composed of paper and/or wooden packaging materials, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wiring, uncontaminated cloth, metal buildings, empty containers with a holding capacity of five gallons or less, uncontaminated floor sweepings, or food packaging, that are produced as a result of plant production.
- Class 3 Industrial Solid Waste any inert and essentially insoluble industrial solid waste, including materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc. that are not readily decomposable as defined in §335.507 (relating to Class 3 waste determination).

4.21 Prevention of Discharge of Contaminated Water

The Operations/Maintenance Supervisor shall implement necessary steps to control and prevent the discharge of contaminated water from the facility. No discharge of contaminated water shall occur without obtaining specific written authorization from the

TCEQ prior to the discharge. All water coming in contact with waste or contaminated soils will be treated as contaminated water. Runon and runoff for the 25-year, 24-hour storm event will be controlled following the procedures set forth in Part III, Attachment 6– Groundwater and Surface Water Protection Plan and Attachment 15 - Leachate and Contaminated Water Plan. The landfill will be operated consistent with §330.15(h)(1)-(4) regarding discharge of solid wastes or pollutants into waters of the United States.

4.22 Leachate and Contaminated Water Plan

Leachate and contaminated water will be controlled at the City of Grand Prairie Landfill as specified in Part III, Attachment 15 - Leachate and Contaminated Water Plan.

ATTACHMENT 3

REPLACEMENT PAGES (UNMARKED VERSION)

CORE DATA FORM, TCEQ PART I APPLICATION FORM, TCEQ PLAIN LANGUAGE SUMMARY FORMS, AND PUBLIC INVOLVEMENT PLAN FORM

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006 Revised December 2008 Revised November 2024

Revised February 2025

IEVZAT TURA 84059 02/07/2025

Prepared by

Weaver Consultants Group, LLC TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109

817-735-9770



Texas Commission on Environmental Quality Part I Application Form for New Permit, Permit Amendment, or Registration for a Municipal Solid Waste Facility

Instructions for completing this Part I Application Form are provided in TCEQ 00650-instr¹. Include a Core Data Form (TCEQ 10400)² with the application for the facility owner, and Core Data Forms for the operator and property owner if different from the facility owner. If you have questions, contact the Municipal Solid Waste (MSW) Permits Section by email to mswper@tceq.texas.gov, or by phone at 512-239-2335. Rules cited on this form are in Title 30 Texas Administrative Code (30 TAC) and may be viewed online at www.tceq.texas.gov/goto/view-30tac.

Application Tracking Information

Facility Regulated Entity Name³: City of Grand Prairie Landfill

Site Operator (Permittee or Registrant Name)⁴: City of Grand Prairie

MSW Authorization Number: MSW-996C

Initial Submission Date: 11/13/2024

Revision Date: 02/2025

Application Data

1. Submission Type	
Initial Submission	Notice of Deficiency (NOD) Response

2. Authorization Type	
Permit	Registration

3. Application Type	
🗌 New Permit	
🗌 Permit Major Amendment	Permit Limited Scope Major Amendment
New Registration	

¹ www.tceq.texas.gov/downloads/permitting/waste-permits/msw/forms/00650-instr.pdf

² www.tceq.texas.gov/goto/coredata

³ Facility Regulated Entity Name must match the Regulated Entity Name indicated on the TCEQ Core Data Form.

⁴ Site Operator is defined in 30 TAC 330.3(148) as the holder of, or the applicant for, an authorization (or license) for a municipal solid waste facility.

Applicant Signature Page

Site Operator (Permittee or Registrant Name) or Authorized Signatory

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name:Patricia D.B. Redfearn, Ph.D.	Title: Director of Solid Waste & Recycling
Email Address: predfearn@gptx.org	
Signature: <u>Ratrician B Kedfla</u>	Date: 2/7/2025

Authorization by Facility Owner for Operator to Submit Application

To be completed by the facility owner if the application is submitted by an operator who is not the facility owner.

	I am the owner of the facility that is the subject of this applicat operator,to pursuant to 30 TAC 305.43(c).	tion, and authorize the o submit this application
	Name: Title:	
	Email Address:	
	Signature: Da	ate:
	Notary SUBSCRIBED AND SWORN to before me by the said	vera DB Rastearn
	On this 17 day of Jebaury, 2025	
	My commission expires on the $\underline{\mathscr{B}}$ day of $\underline{\mathscr{Suly}}$, $\underline{\mathscr{202}}$	15
~	Notary Public in and for <i>Hand Mairie</i> , Dallas County Ty (notary's jurisdiction	n, including county and state)
	Note: Application Must Bear Signature & Seal of Notary Public	



Property Owner Affidavit

Property Owner Affidavit for Landfill Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure and post-closure care of the facility. For a facility where waste will remain after closure, I acknowledge that I have a responsibility to file with the county deed records an affidavit to the public advising that the land will be used for a solid waste facility prior to the time that the facility actually begins operating as a municipal solid waste landfill facility, and to file a final recording upon completion of disposal operations and closure of the landfill units according to 30 TAC 330.19 (relating to Deed Recordation). I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name: Patricia I	D.B. Redfearn, Ph.D.		
Email Address:	predfearn@gptx.org		
Signature:	Ratricia DB Red Jan	Date:	2/7/2025

Property Owner Affidavit for Processing Facility

I acknowledge in accordance with 30 TAC 330.59(d)(2) that the State of Texas may hold me either jointly or severally responsible for the operation, maintenance, and closure of the facility. I further acknowledge that the facility owner or operator and the State of Texas shall have access to the property during the active life and post-closure care period for the purpose of inspection and maintenance.

Name:	
Email Address:	
Signature:	Date:
Notary C SUBSCRIBED AND SWORN to before me by the said	Patricia DB Red Vearn
On this 7 day of Sebruary, 2025	
My commission expires on the $\underline{\mathcal{B}}$ day of $\underline{\mathcal{J}}$	_, 2025
Lorario D. Chaver	
Notary Public in and for Chand Tairie, Dallas County, Ta (notary's ju	urisdiction, including county and state)
Note: Application Must Bear Signature & Seal of Notar	ry Public



PARTS I/II GENERAL APPLICATION REQUIREMENTS

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006 Revised August 2009 Revised August 2014 Revised November 2024

Revised February 2025



Prepared by

02/07/2025

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109 817-735-9770

2.1.2 Properties and Characteristics of Waste

The major classifications of solid waste to be accepted at the City of Grand Prairie Landfill include household waste, yard waste, commercial waste, regulated asbestos-containing material (RACM), industrial waste (nonhazardous), construction-demolition waste, and some special wastes. Each classification of waste is defined by §330.2 as follows:

- **Household Waste:** Any solid waste (including garbage, trash, and sanitary waste in septic tanks) derived from households (including single and multiple residences, hotels, motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds, and day-use recreation areas); does not include yard waste or brush that is completely free of any household wastes.
- **Yard Waste:** Leaves, grass clippings, yard and garden debris, and brush, including clean woody vegetative material not greater than 6 inches in diameter, that results from landscaping maintenance and land-clearing operations. The term does not include stumps, roots, or shrubs with intact root balls.
- **Commercial Solid Waste:** All types of solid waste generated by stores, offices, restaurants, warehouses, and other nonmanufacturing activities, excluding residential and industrial wastes.
- **RACM** Friable asbestos-containing material (ACM), Category I nonfriable ACM that has become friable, Category I nonfriable ACM that has or will be subjected to sanding, grinding, cutting, or abrading, or Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations. In accordance with 30 TAC §330.173(c), the facility will accept waste defined as Class 1 only due to RACM content.
- **Industrial Waste (Nonhazardous):** Solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations, classified as follows:
 - Class 2 Industrial Solid Waste any individual solid waste or combination of industrial solid wastes that cannot be described as Class 1 or Class 3, as defined in §335.506 (relating to Class 2 waste determination).
 - Class 3 Industrial Solid Waste any inert and essentially insoluble industrial solid waste, including materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc. that are not readily decomposable as defined in §335.507 (relating to Class 3 waste determination).
- **Construction-Demolition Waste:** Waste resulting from construction or demolition projects; includes all materials that are directly or indirectly the by-products of construction work or that result from demolition of buildings and other structures, including but not limited to, paper, cartons, gypsum board, wood, wood shavings, rubber, and plastics.

• **Special Wastes:** Any solid waste or combination of solid wastes that because of its quantity, concentration, physical or chemical characteristics, or biological properties requires special handling and disposal to protect human health or the environment. If improperly handled, transported, stored, processed, or disposed of, or otherwise managed, it may pose a present or potential danger to human health or the environment.

Consistent with §330.5 the facility will not accept Class 1 non-hazardous industrial waste, regulated hazardous waste, PCBs, infectious medical wastes, or other wastes prohibited by TCEQ regulations.

2.1.3 Solid Waste Containment System

The design objective of the containment system (final cover, liner, and leachate management systems) is to isolate the solid waste and remove leachate (defined as water that has contacted solid waste) that may collect on the liner system. The liner system proposed for the City of Grand Prairie Landfill (floor grades) is shown in Figure 2.1. The liner system design also includes an underdrain system for liner construction below highest measured groundwater elevations. Excavation side slopes will include a 3-foot thick compacted clay liner overlain a 2-foot thick



Figure 2.1 The liner and cover systems are designed to meet or exceed all state and federal regulations.

protective cover layer. Design information and the required QA/QC construction procedures for the individual components of the containment system are presented in Part III of this application. In addition to the above, an existing slurry wall is located around the Subtitle D portion of the site as discussed in Section 3.

2.1.4 Site Development Plan

The site development plan (SDP) is included in Part III in this application. This plan sets forth the overall design and operating characteristics of the landfill. Drawings showing the proposed landfill configuration during site development are presented in Part III, Attachment 1 - Site Layout Plans. A summary of the landfill configuration is provided below.

• With this expansion, the existing limits of waste and the excavation plan will be the same as the currently permitted design. The currently permitted limits of waste and excavation plan are shown on Figure I/II-3.2. This excavation plan was approved by TCEQ in February 2003. This expansion only involves an increase in the permitted fill height, and does not revise the currently permitted excavation plan and limits of waste for this facility. The permit boundary of the municipal solid waste landfill encompasses 178.05 acres (see Section 13 for detailed legal description). The area available for solid waste fill is about 143.6-acres.

PART III - SITE DEVELOPMENT PLAN SITE DEVELOPMENT PLAN NARRATIVE

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006

Revision 24 Revised November 2024

Revised February 2025



Prepared by

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Boulevard, Suite 206 Fort Worth, Texas 76109 817-735-9770

The major classifications of solid waste to be accepted by this facility for disposal include both residential MSW and commercial MSW. Such waste consists of household wastes, construction-demolition waste, and various nonhazardous industrial and special wastes as authorized by the TCEQ. Regulated asbestos-containing material (RACM) as defined in 40 CFR §61.141 will be accepted as detailed in Part IV – Site Operating Plan, Section 4.20.5 – Regulated Asbestos-Containing Material. In accordance with 30 TAC §330.173(c), the facility will accept waste defined as Class 1 only due to RACM content. Consistent with §330.5, the site will not accept regulated hazardous wastes, Class 1 nonhazardous industrial waste, PCBs, infectious medical wastes, or other wastes prohibited by TCEQ regulations. Waste classifications are provided in Parts I/II, Section 2.1.2 – Properties and Characteristics of Waste.

PART IV – SITE OPERATING PLAN

Prepared for

City of Grand Prairie

Permit Issued October 31, 2006 Revised March 2010 Revised November 2015 Revised February 2018 Revised June 2019 Revised November 2024

Revised February 2025

84059 02/07/2025

Prepared by

Weaver Consultants Group, LLC

TBPE Registration No. F-3727 6420 Southwest Blvd., Suite 206 Fort Worth, Texas 76109 817-735-9770



CONTENTS (Continued)

02/07/2025

4.8	Control of Waste Spilled on Route to the Site	IV-21
4.9	Disposal of Large Items	IV-22
4.10	Air Quality and Odor Management Plan	IV-22
4.11	Disease Vector Control	IV-24
4.12	Maintenance of Site Access	IV-25
4.13	Salvaging and Scavenging	IV-26
4.14	Endangered Species	IV-26
4.15	Landfill Gas Control	IV-26
4.16	Oil, Gas, and Water Wells	IV-27
4.17	Compaction of Solid Waste	IV-28
4.18	Soil Management, Placement, and Compaction of Daily,	
	Intermediate, and Final Cover	IV-28
	4.18.1 Soil Management	IV-28
	4.18.2 Daily Cover	IV-29
	4.18.3 Intermediate Cover	IV-31
	4.18.4 Final Cover	IV-31
	4.18.5 Cover Application Log	IV-32
4.19	Prevention of Ponded Water	IV-32
4.20	Disposal of Special Wastes	IV-33
	4.20.1 Sludges	IV-35
	4.20.2 Dead Animals	IV-35
	4.20.3 Empty Containers	IV-35
	4.20.4 Nonregulated Asbestos-Containing Materials	IV-35
	4.20.5 Regulated Asbestos-Containing Materials	IV-36
	4.20.6 Industrial Waste	IV-36c
4.21	Prevention of Discharge of Contaminated Water	IV-36c
4.22	Leachate and Contaminated Water Plan	IV-36d
4.23	Site Inspection and Maintenance List	IV-37
4.24	Visual Screening of Daily Operations	IV-38
SEQU	UENCE OF DEVELOPMENT	IV-39
DET	ECTION AND PREVENTION OF DISPOSAL OF PRO	HIBITED
WAS	TES	IV-40
6.1	General	IV-40
6.2	Load Inspection Procedure	IV-41
6.3	Recordkeeping	IV-43
6.4	Training	IV-43
6.5	Managing Prohibited Wastes	IV-44
6.6	Managing Mishandled or Undeclared Special Waste	IV-44

5

6

4.2 Unloading Wastes

4.2.1 Unloading Areas

The City of Grand Prairie Landfill accepts general municipal solid wastes as well as brush, rubbish, construction/demolition waste, and certain special wastes outlined in Section 4.20 of this SOP. Wastes are disposed of or processed at the following two unloading areas at the City of Grand Prairie Landfill.

- MSW Unloading Area or Working Face. The vast majority of all wastes accepted at this facility are disposed of at the working face. The working face includes areas where waste has been deposited for disposal but has not been covered with soil.
- Citizens Convenience Center. This unloading area is used to store large item/white goods and other recyclables. Also, this area may be used to store wood waste, wood chips, concrete rubble, and roll-offs for the Citizens Convenience Center.

4.2.2 Waste Excluded from Disposal at the Site

The following wastes are specifically excluded from disposal at the site:

- Regulated hazardous wastes (refer to Section 6 for more information)
- Liquid wastes that do not pass the paint filter test
- Articles, equipment and clothing containing or contaminated with PCBs (refer to Section 6 for more information)
- Grease trap wastes
- Class 1 Non-hazardous Industrial Wastes (refer to Section 4.20.5)
- Waste prohibited by the TCEQ (see 30 TAC §330.15(e))

4.2.3 Waste Unloading Procedures

Office Assistants, Equipment Operators, Spotters, and Laborers will monitor the incoming waste for each of the unloading areas. Office Assistants control site access and monitor incoming vehicles for unauthorized wastes by (1) receiving manifests and other

disposed of by any other means by which the material could be crumbled into a friable state.

4.20.5 Regulated Asbestos-Containing Materials

Regulated Asbestos-Containing Materials (RACM) may be accepted at the facility in accordance with Title 30 TAC §330.171(c)(3). This section outlines processes and procedures for acceptance and disposal of RACM.

Prior to acceptance of Class 1 RACM, the site will request and review a waste profile from the RACM generator. Class 1 RACM is Class 1 waste only due to RACM content. RACM containing waste that is classified as Class 1 due to additional parameters will not be accepted. Once the Landfill Manager, or his designee, approves the waste profile for acceptance, the waste profile will be placed in the Site Operating Record. Each RACM shipment will be accompanied by a waste manifest. Upon receipt, the Landfill Manager, or his designee, will sign the manifest for pre-authorized RACM shipments for disposal and complete the destination section of each manifest. The manifests will be prepared in triplicate. The disposal facility copy will be filed in the Site Operating Record. One copy will be returned to the RACM delivery vehicle driver, and one copy will be returned to the waste generator within 30 days after receipt of the RACM. Acceptable manifests will include at least the following information:

- 1. Identity and telephone number of the generator;
- 2. Required information connecting the manifest to the pre-approved waste profile;
- 3. Description and quantity of waste delivered from the generator;
- 4. TCEQ registration number and TCEQ waste code (if applicable);
- 5. Landfill's name.

Disposal of RACM may occur at any location within the constructed Subtitle D landfill footprint as further described below. The site will document the volume of RACM and the disposal depth and location. The RACM disposal area will not be larger than 50 feet by 50 feet. A registered professional land surveyor (RPLS) will survey and mark each RACM disposal location and will identify this location on a current site drawing, which will be maintained at the site. This information will be submitted as a RACM placement notification to TCEQ, as explained in the RACM placement below.

The site will use the following criteria for RACM placement:

- The Landfill Manager, or his designee, will coordinate the delivery of RACM so that the waste arrives at a time that site personnel can properly manage it.
- RACM will be accepted at the site only if it is contained in tightly closed containers or bags or wrapped as necessary with 6-mil-thick polyethylene.
- During unloading and placement of RACM in the designated area(s), utmost care will be taken to prevent the bags or containers from breaking open.
- RACM will be placed in the constructed Subtitle D landfill sectors, such that it will not be subject to future exposure through erosion or weathering.

- RACM will be placed below natural grade where practical or possible.
- If placed above natural grade, the RACM will be placed at least 20 feet away from any exterior final side slopes and at least 10 feet below the final surface grade.
- RACM will not be placed within 20 feet of the edge of the adjacent pre-Subtitle D area.
- Immediately after RACM is placed in the landfill, one foot of soil cover or 3 feet of asbestos-free municipal solid waste will be immediately placed over the RACM.
- Information and documents pertaining to RACM profiled for disposal and delivered to the landfill for disposal including, but not limited to, records concerning measurements and analyses performed at the site, will be retained in the Site Operating Record.
- A RPLS will survey and mark each RACM disposal location and will identify this location on a current site drawing, which will be maintained at the site.
- Immediately upon placement of RACM, the site will submit a letter to the TCEQ executive director (MSW Permits Section) to certify RACM was placed in an acceptable area and disposed of following the procedures in Section 4.20.5.
- Following disposal of RACM, the site will submit a written notification of RACM placement as well as a site diagram identifying the RACM area to the executive director (MSW Permits Section) no later than the 25th day of the month following the month the RACM was received. The site is not expected to receive RACM on a regular basis. The facility is required to submit monthly Class 1 waste acceptance reports required by 30 TAC §330.173(h), including months in which no Class 1 waste was received at the facility.

A waste discrepancy report will be completed when:

- 1. RACM arrives without a properly completed waste manifest;
- 2. RACM arrives and the waste material does not match the description on the waste manifest;
- 3. RACM arrives and the information on the manifest is determined to be incorrect; or
- 4. RACM arrives which does not match the information given in the waste profile submitted by the generator.

The facility will not accept or sign for shipments of Class 1 waste that is not RACM.

The Landfill Manager, or his designee, will attempt to resolve any waste discrepancies. If the discrepancy can be resolved, the waste may be accepted, and the discrepancy report will be filed with the shipping documents to document the resolution of the discrepancy. If the discrepancy cannot be resolved, the waste shipment will be rejected, and a

discrepancy report will be prepared and filed for the rejected waste shipment.

If delivered RACM is determined to be unauthorized waste, the site will follow the procedures within Section 6 – Detection and Prevention of Disposal of Prohibited Wastes.

In the event that RACM-containing bags or containers rupture at the working face, they will be immediately contained by spraying the area with water to prevent the spread of RACM. Also, earthen dikes, berms or other appropriate measures will be constructed to contain the spill. The Landfill Manager, or his designee, will be promptly notified of the spill and will coordinate the collection and disposal of the spilled RACM. The spilled RACM will be picked up mechanically or by employees wearing proper protective equipment and re-packaged for disposal. The spill response team will include the Landfill Manager and his designees, who have been trained to respond to RACM spills.

Specific procedures for the cleanup of the spill are outlined below.

- Personnel will take positions upwind of the RACM spill area during the cleanup procedures.
- Employees involved in cleanup will make use of the site's spill control kits, which may include: respirators, disposable coveralls, shoe covers, gloves, and safety glasses or goggles.
- Other site personnel will be directed away from the area until cleanup is complete.
- If the spill of RACM involves a reportable quantity (one pound or more), the National Response Center (NRC) must be notified by the Landfill Manager, or his designee.
- Emergency cleanup actions will include the following.
 - Utilize a water truck to wet down waste with water.
 - Excavate the waste material, place it into a properly labeled bag or a closed container, and dispose of it with the other RACM.
 - Wash any contaminated equipment or machinery.
 - Dispose of gloves, coveralls, and shoe covers in a tightly sealed 6 mil plastic bag.
 - Wash all other personal protective equipment with soap and water.
 - Check the respirator, refit it with new filter cartridges, and store it in a resealable, airtight container for future use.
- Any water pooling from wetting down the spilled material will be removed with a vacuum truck. The removed water will be direct discharged to a sewer line via the existing permitted sewer connection's loading manhole or transported to a properly permitted privately or publicly owned off-site wastewater treatment facility (POTW).

• Soil that has contacted the water used to wet down the RACM will be excavated and disposed of at the working face. The excavation of this material will occur immediately after the RACM has been removed.

During the active life and postclosure period, any activity that will involve disturbance of previously deposited waste, regardless of originally documented RACM disposal location, a potential disturbance of RACM will be submitted to TCEQ MSW Permits Seciton. These activities will include but are not limited to landfill gas extraction well drilling.

Upon closure of the facility, a notation will be placed in the deed property records of Dallas County indicating that the site accepted RACM. This notation will include a diagram indicating all areas where RACM was disposed of on the property, or alternatively, all areas where the landfill could potentially contain RACM. A copy of this documentation will be provided to TCEQ.

4.20.6 Industrial Waste

Class 1 RACM, Class 2, and Class 3 industrial solid wastes will be accepted at the facility. Industrial waste (nonhazardous) is defined by §330.3 as solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations, classified as follows:

- Class 1 RACM Industrial Solid Waste In accordance with 30 TAC §330.173(c), the facility will accept waste defined as Class 1 only due to RACM content.
- Class 2 Industrial Solid Waste any individual solid waste or combination of industrial solid wastes that cannot be described as Class 1 or Class 3, as defined in §335.506 (relating to Class 2 waste determination). Examples of Class 2 Industrial Waste include "plant trash" or waste originating in the facility offices or plant production areas that are composed of paper and/or wooden packaging materials, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wiring, uncontaminated cloth, metal buildings, empty containers with a holding capacity of five gallons or less, uncontaminated floor sweepings, or food packaging, that are produced as a result of plant production.
- Class 3 Industrial Solid Waste any inert and essentially insoluble industrial solid waste, including materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc. that are not readily decomposable as defined in \$335.507 (relating to Class 3 waste determination).

4.21 Prevention of Discharge of Contaminated Water

The Operations/Maintenance Supervisor shall implement necessary steps to control and prevent the discharge of contaminated water from the facility. No discharge of contaminated water shall occur without obtaining specific written authorization from the

TCEQ prior to the discharge. All water coming in contact with waste or contaminated soils will be treated as contaminated water. Runon and runoff for the 25-year, 24-hour storm event will be controlled following the procedures set forth in Part III, Attachment 6– Groundwater and Surface Water Protection Plan and Attachment 15 - Leachate and Contaminated Water Plan. The landfill will be operated consistent with §330.15(h)(1)-(4) regarding discharge of solid wastes or pollutants into waters of the United States.

4.22 Leachate and Contaminated Water Plan

Leachate and contaminated water will be controlled at the City of Grand Prairie Landfill as specified in Part III, Attachment 15 - Leachate and Contaminated Water Plan.