

CITY OF DEL RIO LANDFILL

VAL VERDE COUNTY, TEXAS

TCEQ PERMIT NO. MSW-207C

MAJOR PERMIT AMENDMENT APPLICATION PART IV – SITE OPERATING PLAN

Prepared for
City of Del Rio

September 2023
Revision 1 August 2024

Prepared by
CP&Y an STV Company
TPBE Registration No. F-1741
13155 Noel Road, Suite 200
Dallas, TX 75240
214-638-0500



This document is intended for permitting purposes only.

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1.0 PURPOSE

This Site Operating Plan (SOP) is intended to provide instructions and procedures for the daily operation of every component of the City of Del Rio Landfill. The SOP has been prepared consistent with Title 30 Texas Administrative Code (TAC) §330.650. This SOP, the permit and the current Texas Commission on Environmental Quality (TCEQ) regulation will be kept onsite throughout the facility's operating life.

The approved Site Development Plan, the Site Operating Plan, the Final Closure Plan, the Post Closure Maintenance Plan, the Landfill Gas Management Plan, and all documents and plans required by TAC §330, Subchapter D, shall become operational requirements and shall be considered a part of the operating record of the facility. Any deviation from the permit and incorporated plans or other related documents associated with the permit is a violation of TAC §330, Subchapter D.

The terms TCEQ and "Executive Director" (ED) shall refer to the current executive director of the TCEQ or the ED's designated representative. References to the permit for this facility shall refer to the most current version of the permit, including any approved amendments or modifications.

The Landfill Supervisor shall have general responsibility for implementing this SOP. Specific individual responsibilities are described in Section 4 of this SOP.

When a specific rule citation is listed, it shall refer to a rule under 30 TAC Chapter 330, and shall be listed in the form of "§330. 'rule number'".

If any questions arise regarding this SOP, City of Del Rio Landfill personnel should consult with:

- Texas Commission of Environmental Quality
Municipal Solid Waste Section
Austin, TX
Tel.: 512-239-2335

- Texas Commission of Environmental Quality
Region 16
Laredo, TX
Tel.: 956-791-6611

- Texas General Land Office
Spill Reporting Phone: 1-800-832-8224

2.0 RECORDKEEPING REQUIREMENTS

The ED may set an alternative schedule for recordkeeping and notification.

2.1 Required Records

Table 2-1 Required Plans

| Record Required | Frequency | Rule Citation |
|---|---------------------------------|----------------------|
| Facility Permit No. MSW 207C | Submittal of Permit Application | §330.125(a) |
| Site Development Plan | Submittal of Permit Application | §330.125(a) |
| Site Operating Plan | Submittal of Permit Application | §330.125(a) |
| Final Closure Plan | Submittal of Permit Application | §330.125(a) |
| Post-Closure Maintenance Plan | Submittal of Permit Application | §330.125(a) |
| Landfill Gas Management Plan | Submittal of Permit Application | §330.125(a) |
| Any other required plan and any other related document(s) | As required | §330.125(a) |

The documents in Table 2.1 are considered a part of the Site Operating Record. They shall be maintained at the landfill, or an alternate location approved by the ED.

The facility shall also maintain current files of the documents in Table 2.2 as a part of the Site Operating Record. This information shall be recorded and updated within 7 working days of completion of the event or receipt of related analytical data, as appropriate, record and retain in the operating record. The Site Operating Record will maintain all required documents in an organized format and in accordance with the time frames specified in 330.125(b) and will be furnished upon request to the executive director and must be made available for inspection by the executive director.

Table 2-2 Required Operating Record Information

| Record Required | Frequency | Rule Citation |
|--|--|----------------------|
| Location-restriction demonstrations | Submittal of Permit Application | §330.125(b)(1) |
| Inspection records, training procedures, and notification procedures relating to excluding the receipt of prohibited waste | Per Occurrence | §330.125(b)(2) |
| Results from gas monitoring and any remediation plans relating to explosive and other gases | Per Occurrence | §330.125(b)(3) |
| Unit design documentation for the placement of leachate or gas condensate in a municipal solid waste landfill | As necessary | §330.125(b)(4) |
| Demonstration, certification, findings, monitoring, testing, and analytical data relating to groundwater monitoring and corrective action (not required at this facility) | Monitoring – Semi-annual Corrective action – as required | §330.125(b)(5) |
| Closure and post-closure care plans | Submittal of Permit Application | §330.125(b)(6) |
| Cost estimates and financial assurance documentation relating to financial assurance for closure and post-closure | Annually | §330.125(b)(7) |
| Information demonstrating compliance with the small community exemption criteria (not applicable at this facility) | Submittal of Permit Application | §330.125(b)(8) |
| Copies of all correspondence and responses relating to the operation of the facility, modifications to the permit, approvals, and other matters pertaining to technical assistance | Per Occurrence | §330.125(b)(9) |
| Documents, manifests, trip tickets, etc., involving special waste | Per Occurrence | §330.125(b)(10) |
| For any spray applied alternative daily cover (ADC) material, records of application rate and total amount of ADC applied on the days when the ADC is applied (N/A to this facility) | Per Occurrence | §330.125(b)(11) |
| Any other document(s) as specified by the approved permit or by the TCEQ ED | As necessary | §330.125(b)(12) |

2.2 Training Records

The facility shall maintain personnel training records as listed in Table 2-3. Personnel shall receive training within 30 days of hire.

The facility shall employ at least one responsible employee credentialed with a Class A license issued pursuant to the requirements of 30 TAC Chapter 30, Subchapter F. City personnel shall obtain a Class A license within 60 days after being hired. Operator personnel that need Class A license will have license at the time of hire.

Table 2-3 Required Training Records

| Training Records | Rule Citation |
|--|---------------|
| Training Records required by TAC § 335.586(d) and (e). | §330.125(e) |
| Personnel operator license records | §330.125(f) |

2.3 Additional Records

Although the city is not required by 30 TAC Chapter 330 to maintain the following record and documents, it is good practice to record and maintain these records to demonstrate compliance with the relative TCEQ regulations.

Table 2-4 Additional Records

| Record Required | Frequency | Rule Citation |
|---|-----------------|---------------|
| Access control breach and repair notices to TCEQ when notification is required (See Section 10.3) | Each Occurrence | §330.131 |
| Access control inspection and maintenance | Daily | §330.131 |
| Daily litter pickup | Daily | Section 17 |
| Fire occurrence notices, if applicable (See Section 9 – Fire Protection Plan) | Each Occurrence | §330.129 |
| Windblown waste and litter control operations | Daily | Section 14 |
| Management and disposal of large items | As necessary | |
| Documentation of compliance with approved odor management plan | As necessary | |
| Dust nuisance control efforts | As necessary | |
| Access roadway regrading | As necessary | |
| Salvaged material storage nuisance control efforts | As necessary | |
| Ponding prevention compliance documentation | As necessary | §330.167 |
| Special waste operational plan compliance documentation | As necessary | |
| Special waste contingency plan compliance, if applicable | As necessary | |
| RACM contingency plan compliance, if applicable | As necessary | |
| Class 1 industrial waste contingency plan (not applicable at this facility) | N/A | |
| Documentation when alternate operating hours are used | As Necessary | §330.135 |
| Documentation of efforts taken in response to gas detection and steps taken | As Necessary | §330.371 |
| Cover Inspection Record | Daily | §330.165 |

Annual written notice shall be submitted to the ED for each occurrence that documents are placed into the operating record. This notification shall include a listing of all records added to the operating record and the date that they were added. Upon request, all information in the operating record shall be made available to the ED.

All information contained within the operating record shall be retained for the life of the facility including the post-closure care period.

3.0 WASTE ACCEPTANCE RATES

In accordance with §330.125(H), the waste acceptance rates are provided to aid in obtaining the correct balance of available on-site equipment, personnel, and other provisions related to implementing this SOP. The waste acceptance rate is reported in tons, and includes all waste that is accepted at the site. The facility shall maintain the waste acceptance record listed in Table 3-1, and provide these reports to the ED as required by §330.675.

Table 3-1 Waste Acceptance Rate Records

| Training Records | Rule Citation |
|---------------------------------------|--------------------------|
| Quarterly solid waste summary reports | §330.125(h) and §330.675 |
| Annual solid waste summary reports | §330.125(h) and §330.675 |

The permit for the facility does not establish a waste acceptance rate, nor does it restrict acceptance. The previous 4 quarterly reported waste acceptance rates are listed in the table below. The future waste acceptance rate is projected for a 5-year period. Those figures are presented in the following Table 3-2.

Table 3-2 Waste Acceptance Rate Records

| Fiscal Year | Landfill Disposal (tons) | Diverted | | | |
|----------------------|--------------------------|--------------|--------------------|---------------|--------------|
| | | Brush (tons) | White Goods (tons) | Sludge (tons) | Tires (tons) |
| 2017-18 | 42,072 | 6,010 | 137 | 553 | 99 |
| 2018-19 | 45,399 | 5,778 | 140 | 0 | 73 |
| 2019-20 | 54,487 | 7,314 | 240 | 0 | 102 |
| 2020-21 | 58,055 | 8,614 | 183 | 0 | 29,116 |
| 2021-22 | 47,068 | 8,186 | 114 | 0 | 5,065 |
| 5-Year Average | 49,416 | 7,180 | 163 | 111 | 6,891 |
| Days per Year | 309 | 309 | 309 | 309 | 309 |
| Average Tons per Day | 160 | 23 | 0.53 | 0.36 | 22 |

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, the facility shall file an application to modify the permit application, including the revised estimated waste acceptance rate, in accordance with TAC §305.70(k) (relating to Municipal Solid Waste Permit and Registration Modifications), within 90 days of the exceedance as established by the sum of the previous 4 quarterly summary reports. The application must propose any needed changes in the Site Operating Plan to manage the increased waste acceptance rate to protect public health and the environment

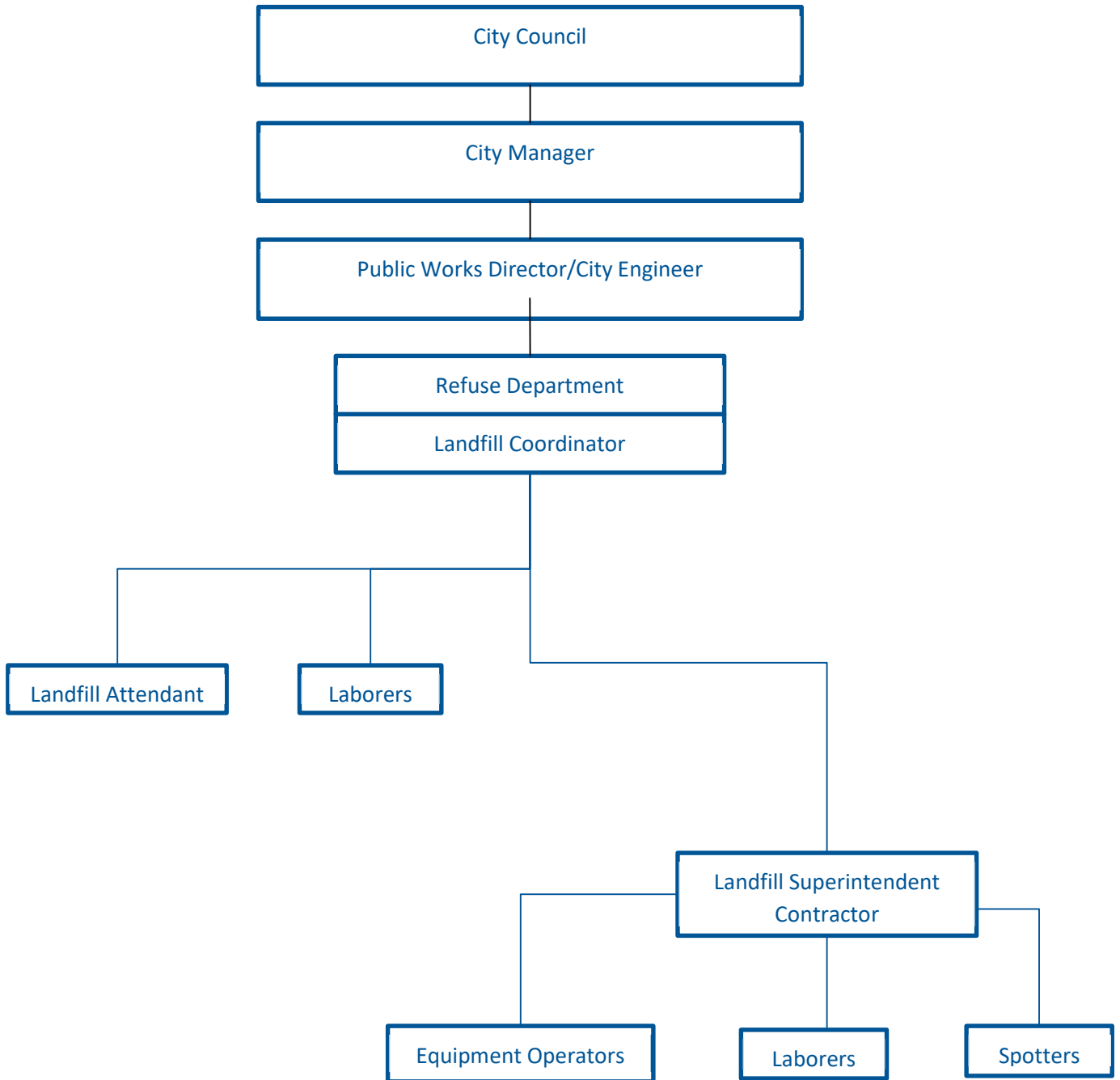
4.0 LANDFILL PERSONNEL

4.1 Organizational Chart

The City of Del Rio Landfill is owned by the City and operated by a contractor. The City currently contracts with Platform Waste Solutions to provide landfill services. The contractor, or his successor is referred to as the “Landfill Operator” in this plan. The Landfill operator is responsible for the day-to-day operation of the landfill. At all times that the Landfill is in operation, a landfill operator with a TCEQ issued Class A license shall be in responsible charge of Landfill Operations.

The organizational chart shown in Figure 4-1 provides a graphical illustration of the chain of command for City of Del Rio and Landfill Operator. Personnel and job titles are subject to change based on particular assignments, operational conditions, and/or personnel turnover.

Figure 4-1 - Organizational Chart



4.2 Key Personnel

Responsibility for overall facility management and operation rests with the Del Rio City Council. The Council, working through the City Manager, is responsible for assuring adequate personnel and equipment are available for facility operation in accordance with the Site Development Plan (SDP) and this Site Operating Plan (SOP). The following subsections describe the personnel involved with operating the City of Del Rio Landfill.

4.2.1 City Manager

As mentioned above, the City Manager works with the Council to make sure the Facility is operating in accordance with TCEQ rules and regulations. The City Manager delegates responsibility to the City's Public Works Director/City Engineer for directing the activities of the Facility.

4.2.2 Public Works Director/City Engineer

The Public Works Director/City Engineer is designated as the contact person for matters related to regulatory compliance and management of the refuse collection and reports to the City Manager. He/she shall be a licensed professional engineer in the state of Texas.

4.2.3 Landfill Coordinator (City)

A City Landfill Coordinator, under the direct supervision of the Public Works Director, shall monitor the landfill daily. Duties include planning, organizing, and directly overseeing landfill operations for the City on a daily basis; maintaining and improving the waste disposal and waste diversion procedures at the landfill; planning and constructing earthwork projects (levees, berms, ditches, stockpiles, etc.) using City personnel or landfill crews; coordinating with contract construction crews as needed; overseeing the operation of the landfill within the local, state, and federal regulations pertaining to solid waste; managing concerns and complaints from citizens and other landfill users; and maintaining thorough effective communications between the City landfill staff and the Landfill Operator staff.

Landfill Coordinator must have current certificates of safety and supervision and a waste screening certificate, demonstrated mechanical knowledge of heavy equipment and the ability to operate a desktop personal computer for landfill scale program and daily tracking reports, a high school diploma or equivalent, with 4 years increasingly responsible experience, additional experience in landfill work, computer usage, and supervision is preferred. Landfill Coordinator shall have, or be able to obtain, a TCEQ "Class A" License.

4.2.4 Landfill Superintendent (Landfill Operator)

Duties include supervising landfill operation crews, coordinating with the Landfill Coordinator on the planning, organizing, and direct daily oversight of landfill operations; conducting a variety of technical tasks including scheduling of manpower and equipment; assigning and prioritizing work assignments for the landfill crews; managing waste disposal and diversion; maintaining heavy equipment and instruments; supervising the construction of earthwork projects (levees, berms, ditches, stockpiles, etc.) with onsite labor and equipment; coordinating with other departments and contract construction crews as needed; operating the landfill within the local, state, and federal regulations pertaining to solid waste; managing concerns and complaints from citizens and other landfill users, providing and coordinating staff training and discipline procedures for operation personnel, and maintaining thorough effective communications with the Landfill Coordinator. Landfill Coordinator must have demonstrated mechanical knowledge of

heavy equipment and the ability to operate desktop personal computer for landfill scale program and daily tracking reports. A high school diploma or equivalent, 4 years increasingly responsible experience and a Class B Texas driver's license is required. Additional experience in landfill work, computer usage, and supervision is preferred. The Landfill Superintendent shall directly supervise landfill operations and shall possess a TCEQ issued Class A License subsequent to 30 TAC Chapter 30, Subsection F, and a waste screening certificate.

4.2.5 Equipment Operators (Landfill Operator)

Equipment Operators are under the supervision of the Landfill Superintendent. Duties include operating bulldozers, compactors, scrapers, loaders utilized in the movement of solid waste; and performing a number of miscellaneous tasks related to burial of waste, operation of the landfill, and construction maintenance. As the personnel most closely involved with the actual waste filling operations, the employees are responsible for being alert to any potentially dangerous conditions, careless or improper actions on the part of any person on-site, and reporting such observations to the Landfill Superintendent.

Equipment Operators also perform secondary duties which must not interfere with the safe operation of equipment nor any operations at the working face. Secondary duties include observing waste unloading, assisting landfill customers if problems arise, and to preclude prohibited waste. In addition, they must be able to operate the landfill scales in order to provide relief to the Landfill Attendant. A high school diploma or equivalent is preferred. Two years of experience operating heavy equipment and a Class B license are required. Equipment Operators should have a TCEQ Waste Screening Certificate.

4.2.6 Landfill Attendants

The Landfill Attendant(s) or gate attendant(s), stationed at the site entrance, is primarily responsible for the implementation of landfill admission policies by controlling incoming traffic, screening loads for prohibited hazardous waste, maintaining control of the traffic through the scales, and preserving good public relations. The Attendant shall weigh vehicles and maintain complete and accurate records of vehicles and visitors entering and leaving the facility. The Attendant shall maintain records of daily waste flow using a computer and automated scale software. He or she shall collect and account for daily gate receipts and report any emergencies or unusual activities to the Superintendent. The Attendant(s) shall check all waste loads for adequate cover, or that loads are otherwise protected or contained. All incoming vehicles shall be visually observed for evidence of improper operation, faulty equipment, or unsafe conditions. A high school diploma or equivalent is required. The Attendant shall visually screen waste to assure no unacceptable materials are included in the load and must also have, or be able to obtain, a TCEQ Waste Screening Certificate. Gate scales are calibrated annually by a State of Texas weights and measures certified technician from Western Weights. The Landfill Operators shall be responsible for the annual inspection and pay all costs for said services.

4.2.7 Spotter (Landfill Operator)

The Landfill Operator shall employ spotters to observe all waste delivered to the working face of the landfill. The spotter shall have and maintain a TCEQ Waste Screening Certificate. The spotter shall be located in a safe location that affords a view of waste dumping activities at the landfill

4.2.8 Laborers

Laborers shall be employed from time-to-time as required to maintain proper and safe landfill operations. Categories of additional employment are maintenance, construction, and site clean-up. A list of staff shall be maintained with the Landfill Coordinator and Operations Manager.

5.0 FACILITY EQUIPMENT

Equipment requirements shall vary in accordance with the scope of landfill operations. Based upon operational considerations and equipment requirements at the landfill, additional and different types of equipment may be added and used occasionally to enhance operational efficiency. Routine preventative maintenance of equipment shall be provided. In selecting equipment, the landfill operator has considered the following:

- Site clearing requirements
- Site conditions such as topography
- Auxiliary tasks such as maintaining roads and drainage, assisting in vehicle unloading and moving other materials and equipment around the site
- Quantity and type of refuse
- Variation in refuse quantities received
- Quantity and type of soil to be removed
- Distance soil must be moved
- Time required for covering and soil compaction
- Maintenance needs
- Availability of parts and maintenance
- Standby or backup equipment needs
- Reliability of equipment
- Purchase and operating costs
- Operator comfort
- Variation in weather conditions

5.1 Minimum Equipment

At a minimum, the types of equipment presented in Table 5-1 shall be maintained at the facility and available during normal operating hours. A dated listing or chart of the routine maintenance performed should be kept. Records should be kept to show operator inspections and findings on equipment and the maintenance history of the equipment. In the event of mechanical breakdown of any of the Landfill Operator's equipment that inhibits his ability to receive, compact, and cover waste, he shall have either a standby piece of equipment or the ability to rent the needed equipment and have it on site and functioning within a 48-hour period.

Table 5-1 Minimum Equipment

| Equipment Type | No. of Units Waste Acceptance Range (tpd) | Minimum Size or Capacity | Function |
|---|--|------------------------------------|---|
| Compactor | 1 | 81,000 lbs (Cat 826 or equivalent) | Waste and soil spreading and compaction |
| Track Dozer | 1 | 230 (cat 06 or equivalent) | Waste and soil spreading and compaction |
| Track Loader or Wheel Loader | 1 | 175 hp/3cy | Transportation of daily cover, firefighting support |
| Self-Propelled off-Road with Spraying Equipment Water Truck | 1 | 1,000 gallon | Dust control, firefighting support |
| Motor Grader | 1 | 145 hp | Grading of access roads, soil spreading |
| Self-Loading Scraper or Articulated Dump | 2 | 10 cy | Transportation of daily cover, firefighting support |
| Skid Loader with broom attachment and bucket | 1 | 5,000 pounds | Misc. use. Load scrap metal, clean access road |

*The projected growth in acceptance shall never exceed 500 tpd during the remaining life of the landfill.

5.2 Supplemental Equipment

In addition to the minimum equipment provided at the site, additional equipment may be available and used when needed as determined by the site personnel. Other equipment items that are routinely available for use at the facility are outlined in the Table 5-2. Various additional vehicles and pieces of equipment are also used.

Table 5-2 Supplemental Equipment

| Equipment Type | No. of Units | Minimum Size or Capacity | Function |
|-----------------------|---------------------|---------------------------------|---|
| Fuel Tanks | 2 | 250 and 500 Gal | Equipment refueling |
| Portable Water Pump | 2 (min.) | 3-inch | Removal of water from excavations |
| Pickup Truck | 2 | 3/4-Ton | Personnel or small equipment transportation |
| Air Compressor | 1 | | Clean air filters, check tire pressure |

6.0 GENERAL INSTRUCTIONS

The City of Del Rio shall provide adequate management supervision of the site and operations to assure compliance with the TCEQ Rules and Regulations, the Soil Liner Quality Control Plan (SLQCP), the Landfill Gas Management Plan, and the site operating permit. Duties and responsibilities of personnel are presented in Section 4 – Types of Landfill Personnel.

This SOP contains the procedures necessary for day-to-day site operations, but is not intended to be a comprehensive operating manual for all aspects of this municipal solid waste facility. This document is a general set of instructions that the operating personnel shall follow for operational requirements. The Landfill Coordinator, a qualified representative of the City of Del Rio, shall make regular inspections of all drainage features, soil coverage, and other construction features to ensure that they are functioning as required to provide adequate protection of ground and surface water. A recommended form for this inspection is included in Appendix IV-B – Municipal Landfill Checklist. These inspections shall be conducted daily by site personnel, and at least quarterly by the City of Del Rio. The City of Del Rio shall ensure that corrective action is taken for problems found during the maintenance inspections. Detailed procedures can be found in subsequent sections of this SOP.

7.0 PERSONNEL TRAINING

Preparedness and prevention measures have been developed to minimize both the frequency and severity of accidents and emergency situations threatening human health.

The City's Landfill Coordinator and the Landfill Operator Superintendent shall receive off-site training required to obtain a TCEQ Class A license and shall maintain said licenses. Assigned personnel shall receive 8 hours of off-site training in waste screening consistent with the requirements of 30 TAC 330.127(4) from an authorized provider.

Classroom or on-the-job personnel training shall be provided to all facility operating personnel by the Landfill Operator. Site personnel include the Landfill Supervisor, Landfill Operator Superintendent, and all site operating personnel. Training shall include safety and accident prevention, permit requirements, and contingency plans. Site training meetings shall be scheduled at least monthly. If a regular monthly meeting is cancelled, it shall be rescheduled or combined with the regularly scheduled training the following month. Personnel shall be scheduled for training sessions so that site operations may be continued with minimal disturbance. Records of site personnel attending training sessions and material covered shall be maintained as a part of the Site Operating Record. Training topics may vary each month; however, training in the following subjects shall be conducted at least annually.

- Safety
- Fire protection, prevention, and evacuation, and fire extinguisher use
- Asbestos waste management
- Emergency procedures, equipment and systems, and response to fires, explosions, groundwater contamination, and site shutdown.
- Litter control and windblown waste pick-up
- Prohibited waste management
- Properties of methane gas and safety procedure for methane gas
- Waste screening, and hazardous waste and PCB waste detection and prevention

All training shall be directed by a person properly trained in waste management procedures. All key personnel shall have their training reviewed annually to ensure that their training is current and complete.

7.1 New Employee Orientation and Training

All newly hired employees of the facility shall be given training in the following areas upon beginning work at the landfill.

- Safety Procedures
- Contingency Plans
- Permit Requirements

All landfill employees shall be supplied with and required to use foot protection, hard hats, hearing protection, and safety vests for personnel directing traffic. In addition, eye protection, respiratory protection, and hand protection equipment shall be made available for use and personnel trained in the use of safety equipment as required by OSHA. Refer to Section 2.2 for time line to complete training.

7.2 Additional Training

In addition to the mandatory annual training requirements, site personnel shall receive periodic training in the following areas:

- Instruct each employee of the site's requirement to post and maintain signs at the site entrance informing the public and waste transporters of the allowable waste for acceptance and the listing of specific waste NOT allowed for disposal.
- Employees shall be trained to be able to safely identify and categorize waste suitable and unsuitable for acceptance or disposal at the Facility.

Employees shall be trained to monitor/observe incoming waste loads as part of a detection and prevention program concerning regulated hazardous waste and PCB waste as listed in Table 7-1.

Table 7-1 Prevention Training

| Training Records | Rule Citation |
|--|---|
| Recognition of prohibited waste | Regulated hazardous waste – 40 CFR Part 261 |
| | PCB waste – 40 CFR Part 761 |
| Detection and prevention of disposal of prohibited waste | Random inspection of incoming loads |
| | Inspection of compactor vehicles |
| | Observe each load that is disposed at the landfill |
| | Maintain records of all inspections |
| Notification | Executive Director (ED) to be notified of any incident involving the receipt or disposal of prohibited waste |
| Remediation of incidents | Landfill personnel have the authority to reject prohibited waste. Those prohibited items which may be accepted at specific unloading areas (such as tires, oil, batteries, and white goods) must not be unloaded at the working face. If they are, these items must be retrieved and sent to the proper unloading area. |

8.0 DETECTION AND PREVENTION OF DISPOSAL OF PROHIBITED WASTE

8.1 Types of Waste Received

The landfill is permitted to receive only municipal solid waste and those special solid wastes allowable under 30 TAC 330.171. These special wastes listed in §330.171 may be accepted if managed per the handling procedures for each waste identified in §330.171(c)(1)-(7). Procedures for accepting special waste are detailed in Section 8.6 of this SOP. In the event that the City elects to accept other special waste in the future, TCEQ's authorization shall be sought and procedures for acceptance prior to accepting this waste shall be provided. The site is not authorized to receive regulated hazardous waste or PCB waste for disposal, as defined in 40 CFR 261 and 30 TAC §330.5. In accordance with the City's permit and current policy, the following special waste items may be accepted under specific procedures as described:

- Municipal water/wastewater sludges
- Slaughterhouse waste
- Dead animals
- Pesticide containers
- Discarded materials containing asbestos

Prohibited waste, which are not accepted for disposal at this facility, include:

- Septic tank pumpings
- Incinerator ash
- Soil contaminated by petroleum products or chemicals
- Used oil
- Waste from mineral recovery operations
- Lead acid storage batteries
- Used oil filters
- Waste generated outside of Texas that contains items listed here
- Items containing PCBs
- Items containing chlorinated fluorocarbon (CFC), unless all CFC contained within has been properly managed and disposed of.
- Liquid waste

The landfill does accept lead acid batteries, motor oil, tires, and items containing CFC's, not for disposal at the working face, but to be stored in a designated area until they are transported off-site for re-use or to be properly disposed of.

All wastes generated by the facility will be processed or disposed at an authorized solid waste management facility.

8.2 Control of Incoming Waste

A detection and acceptance prevention program shall be implemented at the facility to address the detection and prevention of prohibited waste, regulated hazardous waste as defined in 40 Code of Federal Regulations Part 261, and polychlorinated biphenyls (PCB) waste as defined in 40 CFR Part 761. The detection and exclusion program at the City of Del Rio Landfill will include at least the following steps:

- Inform customers of the types of wastes that are excluded from disposal.
- Inform vehicle drivers and transfer station operators of the wastes that are to be excluded.
- Verify that waste within vehicles entering the site is consistent with the waste description list on the manifest.
- Random inspections of incoming loads and compactor vehicles.
- Records of all inspections.
- Training for facility personnel to recognize prohibited waste.
- Notification to TCEQ and any local pollution agency with jurisdiction that has requested to be notified of any incident involving the disposal of regulated hazardous or PCB waste at the landfill.
- Provision for remediation of the incident.

The program shall document the training of all site personnel to recognize and handle unauthorized waste in a safe and environmentally sound manner. The detection and acceptance prevention program applies to all unloading areas including the working face and all specialty unloading areas. Employee training shall include the following:

- Instruct each employee of the site's requirement to post and maintain signs at the site entrance informing the public and waste transporters of the allowable waste for acceptance and the listing of specific waste NOT allowed for disposal.
- Employees shall be trained and equipped to be able to safely identify and categorize waste suitable and unsuitable for acceptance or disposal at the Facility.

Incoming wastes are controlled in three ways so that the facility does not inadvertently receive waste materials which would violate the TCEQ Rules & Regulations. In addition, rules for waste disposal and prohibited waste shall be prominently displayed on sign(s) at the site entrance.

The first level of control is knowledge and training of City of Del Rio and personnel as to what constitutes special, prohibited, regulated hazardous waste and PCB waste, and of the particular requirements for their disposal, and the state and federal regulations which govern the transportation and disposal of these and all other types of industrial and municipal solid waste. This shall aid the City to properly inform the customers as to the restrictions at this landfill. This shall also provide the basis for random inspections. (See Section 8.3)

The second level of control is the Landfill Operator's residential/commercial collection vehicle drivers. These individuals are also informed of the typical visible characteristics of special prohibited and hazardous waste, and which of their customers are likely to be generators of these waste. They shall then be alert to the possible presence of these waste within the waste they collect.

The third level of control is provided by site personnel. The landfill attendant, equipment operators, and spotter shall be alert for indications of unpermitted waste and shall be familiar with the rules and

regulations governing acceptable and unacceptable waste for this facility. A thorough knowledge of §330.15 and 330.171 of the TCEQ Rules & Regulations and a basic understanding of both industrial and hazardous waste generators and their associated transportation and disposal requirements shall be required by site personnel. Particular items, which personnel shall look for, are barrels, possible liquids, TCEQ transporter numbers on trucks, or company names on trucks which could be industrial or hazardous waste generators or generators of unpermitted special waste. This level of control is for non-contractor/city transport vehicles. Pre-inspection techniques shall assist in prevention of unloading of prohibited waste. Pre-inspection techniques include monthly ads in the local paper explaining rules and regulations for disposal at the landfill, information presented on the city web site, and signs on site notifying customers of what waste are allowable and what is prohibited. Should any prohibited waste be observed or suspected, the material shall be isolated, if possible, and excluded from land-filled material. Even if the material is inadvertently mixed with other waste on the working face, procedures shall be implemented whenever safely possible to extract that material and isolate it. Once a suspected unpermitted waste has been isolated and secured, the City of Del Rio's Public Works Director/City Engineer management staff shall be notified to determine the proper course of action.

In the event that a regulated or hazardous waste arrives at the site, the appropriate departments and offices within the TCEQ shall be notified. The applicable phone numbers shall be included in the list of emergency numbers posted. If the waste presents an emergency situation, the services of a hazardous waste specialty firm shall be retained. The appropriate agencies shall be requested to provide assistance to the City through their respective enforcement capabilities in the proper management of unpermitted waste received at the site.

If a mishandled or undeclared special waste is not discovered until after it is unloaded, site personnel will notify the Operations Manager or his designee. The special waste will be segregated and controlled. The mishandled or undeclared special waste will be covered with soil and/or ADC and no additional filling will occur over that area until the special waste is removed and properly disposed of. Survey stakes or similar markings will be placed around the perimeter of the area that contains the special waste so that it is clear where the special waste is located. The Operations Manager or his designee will then develop a plan to properly dispose of the mishandled or undeclared special waste material, consistent with the approved special waste handling procedures outlined in Section 8.6. A record of unauthorized material removal will be maintained in the Site Operating Record.

8.3 Random Inspections

Random inspections of the incoming vehicles shall be performed to ensure that they do not contain regulated hazardous waste, PCB waste, or prohibited waste. Characteristics to be first observed might be unusual odors, heat, fumes, large containers, unusual dust, liquids, or sludge. Random inspections shall be carried out according to the following table.

Table 8-1 Random Inspection Schedule

| Day of Week | Sunday | Monday | Tuesday | Wednesday | Thursday | Friday | Saturday |
|-----------------|--------|--------|---------|-----------|----------|--------|----------|
| No. of Vehicles | 0 | 1 | 2 | 1 | 2 | 2 | 2 |

The average number of trucks (loose, compacted, pickups, etc.) entering the landfill facility is about 120 per day or about 720 per week (the landfill is closed on Sunday). This inspection schedule amounts to ten (10) vehicles inspected per week; this quantity equals well over 1% of total vehicles accepted at the site, and at least 1% of vehicles shall be inspected. The quantity of random inspections shall be reevaluated every 6 months to maintain 1% vehicle coverage. Random inspections shall augment the other normal procedures utilized at the facility, including the observation of the load by the spotters and equipment

operators as it is unloaded at the working face and observation by the landfill attendant of loads delivered in open vehicles.

The working face staff has the authority and responsibility to reject unauthorized loads and have unauthorized materials removed by the transporter, or have on-site personnel remove or otherwise properly manage the materials.

All site personnel, including Landfill Coordinator, Landfill Superintendent, Equipment Operators, and Landfill Attendants, should maintain a thorough understanding of this SOP and should be trained in the following areas:

- Customer notification and load inspection procedures
- Identification of prohibited, regulated hazardous and PCB waste
- Waste handling procedures
- Health and safety
- Recordkeeping

The facility shall maintain copies of the waste screening inspections in the Site Operating Record. These records shall minimally contain the date and time of the inspection, transporter name and address, driver name, vehicle type, the size and source of load, contents of the load, indicators of prohibited waste, and the results of the screening inspection.

In the event that screened waste are suspected to be unauthorized waste, the employee conducting the screening shall immediately notify a supervisor, who will instruct the site personnel in specific activities to be conducted to secure the suspect waste from adversely impacting individuals or the environment.

Investigations to determine if the waste are unauthorized shall be conducted under the direction of the supervisor. In the event that the waste are unauthorized, but no hazardous or PCB waste are identified, facility personnel shall be instructed in the appropriate manner to load the unauthorized waste into the transporter's vehicle for disposal at an approved facility. Site personnel under the direction of the Landfill Coordinator shall prepare an incident report, which will be kept at the site and placed in the Site Operating Record, with a copy mailed to the TCEQ Regional Office within ten (10) business days of the event. This incident report shall minimally note the transporter of the unauthorized materials, their address, telephone number, driver's name, site inspector, location of the inspection, time of inspection, suspected unauthorized waste, and the resolution of the occurrence.

In the event that the waste materials are suspected to contain regulated hazardous waste or PCB waste, the supervisor shall secure the immediate area around the suspect materials. Landfill personnel shall notify the TCEQ ED of the event by telephone, fax transmission, and mail. Landfill personnel shall prepare an incident report, which shall be kept at the site, with a copy mailed to the TCEQ Region office, within ten (10) business days of the event. This incident report shall minimally note the transporter of the unauthorized materials, their address, telephone number, driver's name, site inspector, location of the inspection, time of inspection, suspected unauthorized waste, and the resolution of the occurrence.

8.4 Unloading Areas

Table 8-2 Unloading Areas

| Unloading Area | Number | Maximum Area Size | Description |
|---------------------------|--------|--|--|
| Lead Acid Batteries | 1 | 20 ft x 10 ft | Housed in metal cargo box |
| Motor Oil and Anti-freeze | 1 | 20 ft x 10 ft | Stored in separate 275 gal containers, housed in metal cargo box |
| Tires | 1 | 65 ft x 18 ft | Tires stored in 53 ft enclosed trailer |
| White Goods | 1 | 30 ft x 20 ft | Items placed in 40 yd roll-offs |
| Working Face | 1 | Normal 40 ft x 75 ft Max 50 ft x 100 ft | |

- Lead Acid batteries are not accepted at the working face but are collected in the designated area. Batteries are temporarily stored in a 20 ft x 10 ft area within a metal cargo/storage box. The batteries are hauled off by a local recycler on a regular basis. If necessary, the recycler shall be called for additional pickups. Acceptance of these materials meet the requirements of 330.15(e) because they are not knowingly intentionally accepted for disposal, but only accepted for recycling.
- Motor oil, filters, and anti-freeze are not accepted at the working face, but are collected in the designated area. Although antifreeze is classified as a Hazardous Waste, it is considered a Household Hazardous Waste in accordance with chapter 335, subchapter N and may be accepted for recycling. Therefore 335, Subchapter N does not apply as noted in paragraph 335.401(c) as it is accepted for recycling and not disposal. Motor oil is stored in 275 gal containers, anti-freeze is stored in drums, and filters are stored in metal drums. These materials are picked up by a local recycler on a regular basis. The recycler is called if additional pickups are needed. Acceptance of these materials meet the requirements of 330.15(e) because they are not knowingly intentionally accepted for disposal, but only accepted for recycling.
- Tires are collected separately and stored in an enclosed 53 ft trailer. The trailer is hauled away and replaced with an empty trailer by a local recycler as needed. Acceptance of these materials meet the requirements of 330.15(e) because they are not knowingly intentionally accepted for disposal, but only accepted for recycling.
- White goods are separated from other waste as they enter the landfill gate, and are stored temporarily in 40 SY roll-off containers. As these containers fill, they are transported to a local salvage operation. Any CFC containing materials are included in this category. Acceptance of these materials meet the requirements of 330.15(e) because they are not knowingly intentionally accepted for disposal, but only accepted for recycling.

These special wastes are received and stored outside of the permit boundary and are not part of this Permit.

8.5 Waste Unloading Procedures

Landfill Attendants, Equipment Operators, Laborers, and Spotters will monitor the incoming waste. Landfill Attendants control site access and monitor incoming vehicles for unauthorized or prohibited wastes by (1) receiving manifests and other shipping documents, (2) recording incoming waste loads, and (3) interviewing the driver, as necessary. Any nonconforming issues will be reported to the Landfill Coordinator or designee. If the non-conforming issues involve Special or Industrial wastes, the Landfill Coordinator or designee will review the SOP to verify that all requirements for acceptance of Special and Industrial waste have been met before the material is accepted for disposal. The procedures for handling prohibited waste that is not discovered until after it is unloaded are discussed in Section 8.2.

Equipment Operators, Spotters, Laborers, or other field personnel will be present at all areas where waste is being unloaded to monitor unloading of waste. These personnel will be familiar with the rules and regulations governing the various types of waste that can or cannot be accepted into this facility and will be trained to identify prohibited wastes before being assigned to this task. The personnel will also be trained and have a basic understanding of both industrial and hazardous waste and their transportation and disposal requirements. The Spotters and Equipment Operators have the authority and responsibility to reject unauthorized loads, have unauthorized material removed by the transporter, or have the unauthorized material removed by on-site personnel or otherwise properly managed by the facility. In the event an unauthorized load is discovered at an unloading area, the Spotter, Laborer or Equipment Operator (i.e., working face staff) will notify the Landfill Superintendent or Landfill Coordinator immediately. The Landfill Superintendent or Landfill Coordinator will verify that the appropriate action is taken. In addition, if the unauthorized load is discovered at the site entrance, the Landfill Attendant will notify the Landfill Superintendent or Landfill Coordinator immediately to verify that the appropriate action is taken. A record of each unauthorized material removal event will be maintained in the Site Operating Record.

Solid waste unloading will be controlled to prevent disposal in locations other than those specified by site management. For example, random load inspections will be conducted as outlined in Section 8.3 of this SOP. Any allowable waste deposited in an unauthorized area will be immediately removed and disposed of properly at the current working face. The Spotters and Equipment Operators or other site personnel will actively investigate any approved waste haul vehicles that do not dispose of their waste in an authorized area. In the event that an authorized load of waste has been deposited in an unauthorized area, site personnel will notify the Landfill Superintendent and the waste load will be promptly relocated to the authorized working face area.

8.6 Special Waste Acceptance Procedure

In Accordance with 330.17(b),(c) and (d), the following special wastes do not require any further written approval from the Executive Director if they are accepted and handled in accordance with the procedures outlined below. Any other special wastes require written approval from the Executive Director before acceptance. In accordance with current City policy, acceptance procedures for special waste are as follows:

- Water and wastewater treatment plant sludges that have been tested with the Method 9095 Paint Filter Liquids Test and are certified to contain no free liquids, which have been treated or processed, are not hazardous, and are not hauled in vacuum, may be accepted at this landfill. Quantities shall be limited to that which can be adequately handled at the landfill without creating odor problems, and shall be placed in area(s) designated by the city. Such

material shall be applied to the closed areas of the landfill and disked into the soil as directed by the city.

- Dead animals and slaughterhouse waste shall be covered by at least 2 feet of soil, or 3 feet of other solid waste, immediately upon receipt.
- Drums and metal tanks shall not be accepted at the landfill unless the tops have been removed so that the interiors can be observed prior to crushing.
- Empty containers, which have been used for pesticides, herbicides, fungicides, or rodenticides, may be disposed of in accordance with TAC 330.171(c)(5). Containers shall be triple-rinsed and rendered unusable prior to receipt at the site, and shall be covered by the end of the same working day they are received. If it is not feasible to triple-rinse the containers (e.g., paper bags), the waste must be placed in the active disposal area and covered with at least 3 feet of solid waste, or the waste must be placed in a specially designated area and covered with at least 2 feet of compacted soil. Salvaging or scavenging of containers, which have been used for pesticides, herbicides, fungicides, or rodenticides, shall not be allowed under any circumstances.

Regulated asbestos-containing material (RACM) may be accepted at the site if procedures outlined in TAC 330.171(c)(3) are followed. In general these procedures are:

- The facility has been authorized by the ED to accept RACM.
- The site operator shall provide written notification to the ED of the intent to accept RACM.
- A specific area or areas shall be dedicated to receive RACM. The designated area shall be surveyed and marked by a Registered Professional Land Surveyor and identified on a current site diagram. One copy of the diagram shall be submitted to the ED and one shall be maintained at the site.
- The site shall maintain a record of each load of RACM accepted as to its location, depth, and volume of material.
- Upon closure of the MSWLF unit, which accepted RACM, a notation that the site accepted RACM shall be placed in the deed records with a site diagram identifying the RACM disposal areas. Concurrently, a copy of the deed recordation and site diagram identifying the RACM disposal areas shall be submitted to the ED.
- Delivery of the RACM to the site shall be coordinated by the owner/operator so that the waste shall arrive at a time it can be properly handled and covered.
- RACM shall be accepted only in tightly closed and unruptured containers or bags, or shall be wrapped as necessary with 6-mil polyethylene.
- Bags or containers of RACM shall be placed, where possible, below natural grade. Where not possible, provisions shall be made to insure that the RACM shall not be subject to future exposure due to erosion or weathering of the cover. RACM placed above natural ground shall be located such that it will not be less than 20 feet from any final side slope, and shall be at least 10 feet below the final surface at closure of the MSWLF unit.
- Bags or containers holding the RACM shall be carefully unloaded and placed in final position so as not to rupture any containers. The containers shall be covered promptly with 12 inches of clean earth, or 3 feet of solid waste containing no asbestos, taking care not to rupture the containers.

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- In the event of an accidental spill, a contingency plan shall be prepared by the owner/operator prior to accepting RACM. The Plan shall specify the responsible person(s) and the procedure for the collection and disposal of the spilled material.
 - RACM, which has been classified as a Class 1 industrial waste, may not be accepted for disposal.
 - Non-regulated asbestos waste may be disposed of at this landfill in accordance with TAC §330.171(c)(4). The waste shall be accepted only if the load is covered and shall be placed at the toe of the working face. If the waste cannot be placed at the toe, it shall be placed on an area of the working face which shall not be subject to vehicular traffic or disposed of by any means by which the material could be crumbled into a friable state.
 - Other special wastes not identified above or in TAC §330.171(c)-(d) may not be accepted without written approval from the ED. Approvals will be waste specific and/or site specific and will be granted only to appropriate facilities in compliance with Chapter 330. Requests for approval to accept special wastes must be submitted by the generator to the ED, or to a facility with an approval plan. Requests for approval to accept special wastes must include a description of physical and chemical characteristics and a statement whether or not it is a Class I industrial waste as defined by §330.3, and the quantity and rate at which it is produced and/or the expected frequency of disposal.
 - Class I industrial waste is not accepted for disposal.
 - All requests for approval to accept special wastes must include an operational plan containing the proposed procedures for handling each waste and listing required protective equipment for operating personnel and on-site emergency equipment.
 - All requests for approval to accept special waste must include a contingency plan outlining responsibility for containment and clean up of any accidental spills occurring during the delivery and/or disposal operations.
 - Soils containing petroleum products are not accepted for disposal.
 - The ED may authorize the receipt of special waste with a written concurrence from the facility, however, the facility operator is not required to accept the waste.
 - The ED may revoke an authorization to accept special waste if the owner or operator does not maintain compliance with the rules and conditions imposed in the authorization to accept special waste.

Used oil filters are not accepted for disposal.

9.0 FIRE PROTECTION

The following fire protection information will be posted at the site:

- Emergency contact phone number(s) for site personnel at the main entrance to the site.
- “No Smoking” signs posted at the entrance.

The "No Smoking" rule applies equally to all landfill patrons, City and contract personnel, and visitors, and shall be rigidly enforced by all personnel. Smoking shall be confined to designated areas only, away from active areas of the landfill, fuel stations, and other fire-sensitive areas.

Open burning is prohibited at the site except on an infrequent basis of specific waste as may be authorized by the TCEQ. Any open burning shall be carried out away from any uncovered solid waste, and away from the active area.

All on-site personnel shall be familiar with the locations, uses, and limitations of firefighting equipment.

A fire-fighting soil stockpile shall be kept in close proximity to the active face for aerial fill operations as well as for below-grade operations. Additional soil stockpiles are located near the other types of unloading areas for use in fire-fighting activities.

General fire-fighting methods include smothering with soil, separating burning material from other waste, and/or spraying with water from a water wagon or truck. Water or other fluids used as fire-fighting materials shall be treated as contaminated water. If detected soon enough, a small fire shall be fought with a hand-held extinguisher.

Dead trees, brush, or vegetation adjacent to the active area shall be removed immediately, and grass and weeds mowed so that forest, grass, or brush fires cannot spread to the landfill.

Wood-chipping operations shall be kept in a neat and manageable area separate from the disposal operations.

Landfill equipment shall be moved a minimum of 50 feet from the active disposal area each night.

The site shall be supplied with fire extinguishers of a type, size, location, and number as recommended by the City of Del Rio Fire Department or the City's insurance carrier. Fire extinguishers will be fully-charged and ready for use at all times. Fire extinguishers shall be inspected at least annually and recharged as necessary by a qualified service company, and display a current inspection tag. The gatehouse, and all vehicles and equipment listed as “Minimum Equipment” in Section 5.1 of this SOP, shall be equipped with a fire extinguisher. Fire extinguisher inspection shall be performed after a fire extinguisher has been discharged.

Following a fire event, the facility staff shall review the occurrence to evaluate the fire control procedures to determine if any modifications to the fire prevention plan are warranted. Additionally, the City of Del Rio Landfill will measure its fire-fighting capabilities by an annual re-evaluation of fire control procedures, status of employee training, availability and volume of soil stockpile, and availability and capacity of equipment.

9.1 Local Fire Department

The City of Del Rio fire station, which would respond to a fire at the City of Del Rio Landfill, is located approximately one mile from the landfill site. Fire station personnel shall be invited for a tour and orientation of the landfill facility on an annual basis. The orientation shall include a description of on-site

combustible materials, the location of the combustible materials, the on-site road network, and the on-site water sources.

9.2 Fire Event Rules

The following tasks should be carried out in the event of any fire:

- All personnel shall have received training in fire protection, prevention, and use of fire extinguishers within 30 days of initial employment. Additionally, every employee shall be trained on facility evacuation procedures so that everyone is aware of actions to be taken in the event that an evacuation becomes necessary.
- Personnel shall take immediate precautions to protect themselves including donning appropriate personal protective equipment. Do not attempt to fight a fire alone, or without adequate personal protective equipment.
- Remove all equipment and personnel from the area of the fire, as necessary.
- Alert on-site supervisors and other facility personnel.
- Alert off-site personnel including the Public Works Director/City Engineer, City of Del Rio Fire Department (a City of Del Rio Fire Station is located approximately one mile from the landfill site), and City of Del Rio Police Department, as appropriate and necessary.
- Determine the type of fire, if possible, to ascertain any immediately required evasive actions necessary including evacuating the area, moving upwind, etc.
- Assess the extent and likelihood of the fire spreading, and determine materials and equipment needed to address the fire.
- Attempt to contain, suppress, or extinguish the fire using established methods and procedures and in accordance with site safety policies.
- Upon arrival of other staff, provide updates on actions taken, assistance needed, etc.
- In the event a fire is beyond the fire-fighting capabilities of the site personnel, or the fire includes unknown substances, the City of Del Rio Fire Department will be contacted for assistance.

9.3 Fire Protection and Prevention

The specialty unloading areas are located in the “front” of the landfill facility, as opposed to the “pit area” where the working face is located. The front area also includes the facility office, scale house, and tool room. Fire extinguishers are available in these areas and the pit area as detailed in the Table 9-1.

Table 9-1 Fire Extinguisher List

| Location | Number of Fire Extinguishers | Size of Fire Extinguishers |
|--|------------------------------|----------------------------|
| Office | 1 | 5 lb |
| Scale house | 2 | 5 lb |
| Tool room | 1 | 5 lb |
| Oil unloading area | 1 | 5 lb |
| Battery unloading area | 1 | 5 lb |
| Site utility vehicles (pickups, 2 ea.) | 1 per vehicle | 10 lb |
| Heavy Equipment | 1 per heavy equipment | 5 lb |
| Additionally, the site has a 1,000 gal tanker with pump and hose available for firefighting. | | |

Fire extinguishers will be inspected and certified at least annually. Once any extinguisher has been used, it will be refilled or replaced as soon as possible. If the used fire extinguisher is on a piece of equipment, the equipment shall not be returned to normal service without a fire extinguisher installed.

Fuel spill will be controlled immediately. Soil contaminated with spilled fuel will be excavated and stored in a plastic lined area which prevent run off until authorization can be obtained to be dispose of at the active face or offsite. Contaminated soils may be excavated using a shovel for small areas or with heavy equipment as appropriate. Onsite brush and vegetation will be controlled through mowing at least annually to reduce the possibility of brush fires from spreading to the landfill or off-site.

The compaction of the waste as it is disposed, and the subsequent covering with daily soil cover or ADC, will reduce the potential for fires by reducing voids within the waste and the amount of oxygen available for combustion. The daily cover or ADC serves as a physical, non-combustible barrier to a fire.

In addition, equipment that is used at the working face may be routinely cleaned through the use of high-pressure water or steam clearers. The high-pressure water or steam cleaning will remove combustible waste and caked material which can cause equipment overheating and increase fire potential. The amount of water used to clean the equipment will be minimized.

9.4 Solid Waste Fires at the Working Face

If the fire is in the working face, the burning area shall be isolated or pushed away from the working face quickly before the fire can spread throughout the working face. If this is unsafe or not possible, efforts to cover the working face with earth shall be initiated immediately to smother the fire. The faster stockpiled soil can be placed over the fire, the more effective this method will be in controlling and extinguishing the fire. A sufficient stockpile of soil shall be kept in near proximity to the working face to cover the entire working face with at least 6 inches of soil.

The Landfill Operator shall maintain sufficient equipment on-site to place 6-inches of soil cover over all waste not already covered by 6-inches of soil within one hour in the event of a landfill fire. This is verified by the table and calculation below. The soil stockpile is located less than 8,800 ft from the active face (a

stockpile of material is maintained within 2,500 feet of the active area of the facility); therefore, sufficient equipment is provided.

Table 9-2 Time to Place Soil Cover

| | |
|------------------------------------|-----------|
| Volume of Cover Required | 93 cy |
| Capacity of Earth Moving Equipment | 10 cy |
| Equipment Quantity | 2 |
| Required Loads | 5 |
| Load-up Time | 1.5 min |
| Un-load Time | 0.5 min |
| Maximum Equipment Speed (Loaded) | 25 mph |
| Average Equipment Travel Speed | 20 mph |
| | 1,760 fpm |
| Maximum Time to Place Cover | 60 min |
| Calculated Maximum Time per Load | 10:00 min |
| Maximum Distance from Working Face | 8,800 ft |

Assuming that each earth moving equipment truck can haul 10 CY per load, it will take 10 loads to move the required 93 CY of soil. City of Del Rio Landfill will utilize 2 earth moving equipment trucks to place daily cover, so between the 2 trucks it will be 5 loads each to move the required 93 CY. If the maximum time to place cover is 69 minutes, each truck will have 12 minutes to move the required soil cover.

Determine the Required Loads per Earth Mover:

$$\frac{93 \text{ cy}}{10 \text{ cy/load}} \approx 10 \text{ loads}$$

$$\frac{10 \text{ loads}}{2 \text{ (# of equipment)}} = 5 \text{ loads each}$$

Determine the Time per Load

$$\frac{60 \text{ min}}{5 \text{ loads}} = 12:00 \text{ min per load}$$

$$12:00 - 1.5 - 0.5 = 10:00 \text{ min travel time}$$

Determine Stockpile Maximum Distance from Working Face

$$\frac{10.0 \text{ min} * 1760 \text{ fpm}}{2} = 8,800 \text{ ft one way}$$

A water truck shall also be kept in a state of readiness for firefighting. In general, the tank should be always maintained at least half-full of water and refilled as necessary. The fire hydrant is located adjacent to the entrance to the landfill near the Landfill Operator's office and maintenance yard. There is a second fire hydrant near the back of the landfill located at the end of Las Palmas Road where it intersects the haul road. It is marked by a large yellow double gate in the landfill fence.

9.5 Fires at the Brush Stockpile/Mulching Area

The brush area will be regularly monitored for smoke or fire. If fire is detected at the brush area, the fire procedures in Section 9.3 will be initiated. If it is safe to do so, a track dozer will be used to create a fire line between the burning material and the remainder of the stockpile. The Del Rio fire department will be contacted to provide firefighting support.

9.6 Burning Waste (Hot Loads)

Incoming "hot loads" shall be prevented from dumping in the active area of the landfill. The landfill attendant and other personnel shall be alert for signs of hot loads, such as smoke, steam, or heat being released from incoming waste loads.

Vehicles containing hot loads shall be directed to an area suitable for containing a hot load, away from the working face, to discharge their load. This area shall be away from uncovered solid waste, brush, other vehicles, and fuel supplies.

When a hot load arrives at the landfill, the landfill policy is to have the Landfill Superintendent, or his designee, meet the collection vehicle at the scale house in a pickup truck. The Superintendent, or his designee, will then lead the collection vehicle to an appropriate location within the landfill to discharge the hot load. This location changes frequently due to various conditions at the landfill, including working face location and wind direction. Once the hot load is discharged, the waste should be spread out, and, if necessary, have water applied to it, to extinguish the fire and cool the waste. Once the hot load has thoroughly cooled, the waste shall be transferred to the working face for disposal.

9.7 Vehicle and Fuel Fires

If the fire is contained within a vehicle or piece of equipment, the first step is to bring the vehicle or equipment to a safe stop. If safety of the personnel allows, the vehicle should be parked away from fuel supplies, uncovered solid waste, and other vehicles. Shut off the engine and engage brake or other method to prevent subsequent movement of the vehicle or equipment. After contacting the local Fire Department, all reasonable measures should be employed to contain or extinguish the vehicle fire.

Motorized equipment shall not be parked near fuel stations longer than necessary for refueling. Fuel spills shall be contained and cleaned up immediately.

9.8 Fire Fighting Plan

When a fire is detected within material at the working face, the spotter (or Equipment Operator) will first redirect incoming loads away from the affected area. Working face fires will be extinguished by one of the following techniques.

- If the area of burning waste is small (e.g., an area of 10 feet by 10 feet or less), and is a surface fire, it will be extinguished using a fire extinguisher located on the equipment at the working face. Additional measures will be used, if necessary, to fully extinguish the fire. After the fire is extinguished, the affected portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Inspection of the fire area will be conducted by the Landfill Coordinator or his designee.
- The burning waste material will be removed (i.e., "cut out" of the working face by a dozer or similar equipment) from the working face to an area where it can be covered with 6 inches of soil. The water truck may also be used to extinguish the burning waste. The working face area in which the burning waste was removed will be covered with 6-inches of soil. The affected portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Water that is used to fight the fire will be contained by the contaminated water containment berm. Contaminated water will be managed as specified in the Leachate and Contaminated Water Management Plan. This option is applicable to an approximate burning waste area of 30 feet by 30 feet.
- The burning waste material within the working face will be sprayed with water from one of the water trucks (or tanks) stationed near the working face. The working face area which contained the burning waste will be covered with 6 inches of soil to smother the fire. Upon extinguishing a fire at the working face through smothering with soil, that portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Inspection of the fire area will be conducted by the Landfill Coordinator or his designee. Water that is used to fight the fire will be contained by the contaminated water containment berm. Contaminated water will be managed as specified in the Leachate and Contaminated Water Management Plan. This option is applicable to an approximate burning waste area of 50 feet by 50 feet.
- The burning waste material within the working face will be sprayed with water from one of the water trucks (or tanks) stationed near the working face. Then the burned (or burning) waste material will be removed from the working face to an area where it can be covered with 6 inches of soil. The working face area in which the burning waste was removed will be covered with 6-inches of soil. The affected portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Inspection of the fire area will be conducted by the Landfill Coordinator or his designee. Contaminated water will be managed as specified in the Leachate and Contaminated Water Management Plan. This option is applicable to the entire working face.

In each case listed above, after the Landfill Coordinator or his designee confirms that the fire has been extinguished, waste filling operations in that area may resume. In the extent that the fire cannot be controlled using the methods above, the local fire department will be called at 911.

9.9 Soil Stockpile

A soil stockpile, large enough to cover the working face and any land-filled solid waste covered with alternate daily cover with at least 6 inches of soil, shall be maintained within close proximity to the active area. The stockpile volume shall be evaluated periodically and adjusted to accommodate the projected working face area. The normal working face area is approximately 40 feet by 75 feet (3,000 sf), and the maximum area is approximately 50 feet by 100 feet (5,000 sf). The soil volume required to cover the maximum area with 6 inches of soil is 93 cubic yards.

$$50 \text{ ft} * 100 \text{ ft} * 0.5 \text{ ft} * \frac{1 \text{ yd}^3}{27 \text{ ft}^3} = 92.6 \text{ yd}^3$$

9.10 TCEQ Notification

After any fire that is related to solid waste management activities, which cannot be extinguished within ten (10) minutes of discovery, the facility shall notify the TCEQ's regional office. The TCEQ notification shall include:

- Contact by telephone within 4 hours of the fire discovery
- A written description of the cause and extent of the fire and the response to the fire shall be mailed or faxed within 14 days of the event.

10.0 ACCESS CONTROL

Primary access to the site shall be via Railway Avenue to a privately owned access road maintained by the City of Del Rio. Collection vehicle routes to the landfill are along Railway Avenue, De La Rosa Street and Virginia Street. The main entrance into the site shall be controlled by the landfill attendant. Access controls shall provide for the safety of non-city/contract personnel. Site security measures are designed to prevent unauthorized persons from entering the site, to protect the facility and its equipment from possible damage caused by trespassers, to prevent unauthorized waste disposal and illegal dumping, and to prevent disruption of facility operations caused by unauthorized site entry.

10.1 Control Measures

The site is enclosed on all sides by a 4-foot tall three- or four-strand barbed wire fence. In areas where the fence has been repaired, for one reason or another, four strands of wire have been placed. To prevent inadvertent unauthorized entry, conspicuous warning signs legible from a distance of at least 25 feet will be placed at maximum 600-foot intervals on the fences surrounding the site. These signs shall state "NO TRESPASSING." The site perimeter fence, gates, and locks shall be inspected on a weekly basis at a minimum to determine if all signs are in place and readable, if any breach has occurred, or if the fence or gates have been damaged in any way. In the event of a breach, the site personnel shall respond as outlined below. A written log documenting these inspections should be maintained as a part of the facility records.

During normal site operating hours, facility personnel regularly in the vicinity of the operational area and the entrance can observe any unauthorized persons in these areas. Outside normal operating hours, both the gates at the point where Railroad Avenue intersects City property and at the access road to the landfill site, will be secured with a padlock.

Entry to the active portion of the site will be restricted by City of Del Rio policy to designated personnel, approved waste haulers, and properly identified persons whose entry is authorized by site management. The City of Del Rio reserves the right to restrict access to the site. Visitors will be allowed on the active area only when accompanied by a site representative.

10.2 Access Breach

In the event of an access breach, attempts will be made to permanently repair the breach within 8 hours of discovery. If permanent repair is not possible within this time frame, temporary repairs shall be put in place. The TCEQ regional office shall be notified of access breaches according to the following table. As noted in this table, if a breach can be permanently repaired within 8 hours of discovery, notification to the TCEQ is not required. A record of all repairs and copies of any notifications should be kept with the facility records.

Table 10-1 Access Breach Reporting Requirements

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

11.0 UNLOADING OF WASTE

All incoming loads will be monitored and observed by trained and currently certified personnel. All prohibited waste will be identified and controlled as outlined in this plan. Prohibited waste that may be accepted at specialty unloading areas will be directed to these specific areas for unloading. The specialty unloading areas include lead acid batteries, motor oil and anti-freeze, tires, and white goods (potential CFCs).

Solid waste unloading at the landfill will be controlled to prevent disposal in locations other than those specified by site management. Such control will also be used to confine the working face to a minimum width, yet allow safe and efficient operations. Only one working face will be active on any given day, with all deposited waste in other areas secured by at least daily cover or interim soil cover, at a minimum. Clean loads of brush and landscape waste may be diverted to a separate area for chipping that is well removed from the working face.

Signs with directional arrows and traffic barricades will facilitate restricting the designated disposal locations. These will be placed conspicuously along the access route to the working face of the landfill or other designated disposal areas which will be established for the general public with small loads. The landfill attendant and working face landfill personnel will direct landfill patrons to the proper area. Any waste deposited in an unauthorized area is prohibited and will be promptly collected and disposed of properly by the Contractor (Landfill Operator) at the working face.

The working face of the landfill will be reduced to a compact cell of waste at the end of each day's operation. The width and length of the working face will be maintained as small as practicable in order to maintain the appearance of the site, control windblown waste potential, and minimize the amount of cover soil, or alternate daily cover material required each day. The maximum width of the working face will normally be 40 feet by 75 feet or less.

12.0 FACILITY OPERATING HOURS

Waste acceptance hours approved for the facility are currently between the hours of 7:00 am to 7:00 pm, Monday through Friday, and 7:00 am to 2:00 pm on Saturday. The landfill is normally closed on Sunday and City-observed holidays. Waste acceptance hours may be extended to 6:00 am to 8:00 pm as needed to accommodate special occasions, special City events, other special occurrences, holidays or following city-observed holidays for a maximum of 5 days throughout the calendar year. Additional facility operations may occur during these hours, and may be extended outside of these hours, not to exceed 5:00 am to 9:00 pm, and may include routine facility operation and maintenance, such waste compaction, daily cover application, general cleanup, road construction/maintenance and the operation of heavy equipment. Other activities, such as shop/equipment maintenance and office/clerical work is allowed 24 hours a day, 7 days a week. At no time will the operation of heavy equipment and/or the transportation of materials be allowed between the hours of 9:00 pm and 5:00 am, unless temporary approval is obtained from the TCEQ regional office, in order to accommodate disasters or other emergency situations, or other unforeseen circumstances that could result in the disruption of waste receipt at the facility.

The facility will record in the site operating record the dates, times, and duration when any alternative operating hours are utilized. In accordance with 30 TAC §330.135, both the waste acceptance hours as well as hours of operation will be posted at the site entrance. The facility is not required to notify the TCEQ regional office on days in which the facility will be closed.

13.0 SITE SIGN

Signs shall be posted on site to alert customers to operational procedures, facility rules, regulatory provisions, and traffic control procedures.

A sign shall be located at the site entrance and be readable from outside of the entrance gate. The sign shall measure at least 4 feet square with 3-inch lettering. At a minimum, the sign shall state the following: City of Del Rio Landfill, Type I, TCEQ Permit No. MSW 207C, the hours and days of operation, a 24-hour emergency contact phone number, and local fire department emergency contact phone number(s).

A sign shall also be posted and maintained near the site entrance outlining the prohibited waste, hazardous waste, and other unpermitted special waste that will not be accepted. A sign shall also be located at the site entrance or gatehouse prohibiting uncovered or unsecured loads. A "No Smoking" sign shall also be prominently displayed at the site entrance or gatehouse. Signs shall be inspected monthly and repaired or replaced as necessary.

14.0 CONTROL OF WINDBLOWN SOLID WASTE AND LITTER

Windblown waste will be controlled by combining several measures:

All waste transportation vehicles using this facility will be required to have in place adequate covers or other means of containment for the waste they transport, in accordance with City ordinance and state law. The adequacy of covers or containment of incoming waste will be checked at the facility entrance. Signs will be posted and offenders will be reported to law enforcement officials. Appropriate surcharges and fines will be levied for non-compliance.

Another method to control windblown waste is the prompt landfilling of the waste which have been deposited near the working face. Landfill equipment will be positioned to spread and compact it as rapidly as possible. This will minimize the amount of time the waste remains exposed to the wind and thereby minimize the potential for windblown waste. Also, soil cover or other cover will be placed on the deposited waste as needed during the day's operation to prevent the material from becoming airborne. The size of the working face will be kept as small as practical for solid waste operations.

To further minimize windblown waste, the Landfill Operator will provide portable litter control fences, as necessary, at appropriate locations near the working face and elsewhere. The litter control fences are constructed of a mesh material attached to a free-standing metal frame. The individual litter control fence sections will be located as close as practical to the active area. The screens are transported by landfill equipment or pickup trucks and can be deployed by hand. Multiple sections will be used as required. Screening barriers such as the temporary berms will serve as additional wind breaks.

During extremely windy periods, additional temporary litter control fences will be erected as needed. Also, on days when prevailing winds are from a certain direction, it may be possible to locate the working face operation in a protected or semi-protected area of the site.

Landfill Operator shall inspect the site daily, and collect and return to the working face any windblown waste that has been scattered on-site, or has accumulated on fences, gates, and access roads on days when the facility is in operation. A log of litter inspection and control activities should be maintained in the Site Operating Record to demonstrate compliance.

It shall be the Landfill Operator's responsibility to provide enough personnel or mechanical means to be able to collect and dispose of all windblown litter that occurs in a day's time. Litter shall be collected from site access roads on a daily basis.

15.0 EASEMENTS AND BUFFER ZONES

Any easements or rights-of-way within the site will be visually marked to minimize potential danger to site personnel from damage to the utility. Refer to Figure C.1 in Parts I/II Appendix IIC for easements located within the permit boundary. No solid waste unloading, storage, disposal, or processing operations shall occur within any easement, buffer zones or right-of-way that cross the site. In addition, no waste disposal is allowed within 25 feet of the centerline of any utility line or pipeline easement, unless otherwise authorized by the executive director. To assure non-interference with the utility uses, the easements will be marked in the field in accordance with the TCEQ Rules & Regulations using posts extending above the ground at least 6 feet and spread at intervals no greater than 300 feet. Removed or destroyed markers will be replaced within 15 days. The existing on-site utility easements and rights-of-way are described as follows:

- American Electric Power Easement, 1519 W Calton Rd., Laredo TX 78045, – An overhead power line easement intersects the property boundary at the northeast corner of the site. The easement width is 150 ft; however, this easement will not affect landfill operations.
- Texas Gas Utility Company has a 30 ft wide pipeline easement for an 8-inch-high pressure natural gas pipeline that runs parallel to and approximately 34 feet inside the northeast permit boundary line. The easement is currently owned by West Texas Gas Utility LLC, 303 Veterans Airpark Ln Suite 5000, Midland, TX 79705. This easement is located so that no solid waste management activities will occur within 30 feet of gas line.
- American Electric Power Easement, 1519 W Calton Rd., Laredo TX 78045 – An overhead power liner easement for the leachate pumps runs parallel along the southwest permit boundary line. The easement width is 15 ft. This easement is located so that no solid waste management activities will occur within 30 feet of gas line.

A buffer zone of at least 50 feet exists between all solid waste unloading, storage, disposal, and processing operations and the facility boundary. This buffer zone shall be maintained as to allow the safe passage of firefighting and emergency vehicles and shall be clearly marked. In addition, for vertical or lateral expansions, the owner or operator shall establish and maintain a 125-foot buffer zone for any newly permitted airspace.

16.0 LANDFILL MARKERS AND BENCHMARK

16.1 Landfill Markers

Landfill markers shall be installed at the site to clearly mark the following significant features:

- Site Boundary - (To be placed at each corner of the facility and along the boundary line at intervals not greater than 300 ft).
- Buffer Zone - (To be placed along buffer zone boundary at intervals not greater than 300 ft).
- Easements - (To be placed along centerline of easement and along the boundary of a right-of-way at each corner of the facility and at the intersection of the facility boundary).
- Landfill Grid System.
- SLER area (FMLER not applicable at this site) - (To be placed in areas currently under evaluation and can be determined and maintained through construction and operation. Must not be placed inside liner constructed areas).

- 100-year flood limits (if applicable) – (N/A to this site)

Markers shall be color coded per the following:

Table 16-1 Marker Color

| Marker | Color |
|---------------|--------|
| Site Boundary | Black |
| Buffer Zone | Yellow |
| Easements | Green |
| Grid System | White |
| SLER | Red |
| Floodplain | Blue |

The ED may modify specific marker requirements to accommodate unique site-specific conditions.

The markers shall consist of posts extending no less than 6 feet above the ground and shall not be obscured by vegetation or other obstructions. There shall be sufficient numbers of markers to clearly define the significant feature, but the markers shall be placed no further apart than 300 feet for each significant feature. All markers must be maintained to retain visibility. Markers which are damaged or removed must be replaced or repaired within 15 days of the discovery of damage, or removal of the marker. Markers must be inspected and maintained at least monthly. The documentation of marker inspection and maintenance should be maintained in the facility records.

To facilitate the operations and waste volume calculations, a grid reference system is currently in use for the entire landfill area and will continue to be used at the facility unless written approval of the ED allows its removal. The system consists of numbered markers along the east and west sides of the landfill and lettered markers on the north and south sides of the landfill. The north-to-south grid lines (spaced 100 feet apart) will be perpendicular to the west-to-east grid lines forming squares. The grid marker system will be altered as required to accommodate the TCEQ Rules & Regulations. The grid markers are white 6-foot posts placed to mark 100-foot grid intervals.

The grid markers will be referenced for daily operations. For each submittal of monitoring well installation, each SLER report, each Methane Detection report, and other general references, the site will use either the on-site monuments which are tied to a known datum or the grid markers.

16.2 Site Benchmark

The landfill has multiple benchmark monuments on the site. The primary permanent benchmark monument is located on the northwest side of the landfill as follows:

| <u>Latitude and Longitude</u> | <u>X and Y Coordinates</u> | <u>Elevation</u> |
|-------------------------------|----------------------------|------------------|
| 29° 21' 20.4241" N | 1378001.94 E | 1051.10 |
| -100° 51' 13.9300" W | 13681568.26 N | |

In accordance with 330.143(b)(8), this monument is accessible at all times the landfill is in operation and the area will not be used for disposal. The monument is a bronze survey marker set in concrete and has the benchmark elevation and survey date stamped on it. The benchmark was established from a known U.S. Coast and Geodetic Survey Benchmark.

17.0 MATERIALS ALONG THE ROUTE TO THE SITE

The operator shall take steps to encourage that vehicles hauling waste to the facility are enclosed or provided with a tarpaulin, net or other means to effectively secure the load in order to prevent the escape of any part of the load by blowing or spilling. All uncovered waste hauling vehicles will be charged 200 percent of the current gate fee. In addition, litter cleanup crews will inspect the major public access roads serving the facility daily and collect any litter for a distance of 2 miles in each direction from the site entrance. Roadways include: 1) Railway Avenue southeast from De La Rosa Street and south from U.S. Highway 90 to the Site Entrance, 2) Virginia Street east from Dr. Fermin Calderon Blvd. to the entrance to the landfill, and 3) Access Road from the gate to the active landfill site. A log indicating the date and time of these inspections and cleanup activities should be maintained at the site.

Between the hours of 7:00 am and 7:00 pm, the City Streets and Drainage Department and Landfill site shall maintain telephone service to allow the report of any liter along the roads to the site. Between 7:00 pm and 7:00 am, any liter that could be considered a road hazard can be reported to the police department who in turn will call an emergency contact with the City.

Since the City of Del Rio has maintenance authority over all roadways providing a route to the site, the appropriate City departments are aware that landfill personnel, or persons under the direction of landfill personnel, patrol, and collect landfill related litter along the roadways surrounding the site, as described above. The Landfill Coordinator or his designee will consult with TxDOT officials (or other applicable local agencies with maintenance authority over the roads) concerning cleanup of state highways and rights-of-way consistent with §330.145. The TxDOT District Office or other applicable local agencies will be contacted to discuss the procedures for litter cleanup on, and within, rights-of-way along state highways in the vicinity of the site. Documentation of this TxDOT coordination will be maintained in the Site Operating Record. If TxDOT will not allow access to their right-of-way for litter cleanup, this documentation will be maintained in the Site Operating Record.

18.0 DISPOSAL OF LARGE ITEMS

The facility shall have an established area for the acceptance of large items, including, but not limited to, white goods (stoves, dishwashers, and other household appliances), air conditioner units, and large metal pieces. The area provided for the collection and temporary storage of these items is located just inside the landfill entrance and adjacent to the road leading to the back of the landfill. Large metal items are placed in roll-off-type bins or other containers to minimize exposure or contact to stormwater.

Large items collected at the site will be removed and recycled as demand warrants, and care should be taken to not create nuisance conditions or a source of disease vectors, and to prevent the discharge of pollutants. Large items that are not recycled should be disposed of at the working face. Care should be taken to minimize the potential for damage to the landfill liner system by excluding large items from the first 5 feet of waste placed over the protective cover or liner, placing large items so that they do not interfere with continued landfill operations, and placing and compacting other smaller waste around any large item.

Any item (refrigerator, freezer, air conditioner, etc.) containing chlorinated fluorocarbon (CFC) must be handled in accordance with 40 CFR §82.156(f), as amended. It is preferred that all CFC present has been removed, captured, and sent to an approved CFC disposal or recycling facility before being delivered to the landfill. If the item contains CFC upon delivery to the site, it will be placed in a designated area for collection and temporary storage and transported to a recycling center for proper disposal. Items such as electrical transformers, containing PCBs shall not be accepted at the landfill.

19.0 ODOR MANAGEMENT PLAN

19.1 General

The landfill is subject to TCEQ rules concerning the burning of waste, and air pollution control. The site shall be operated so that the facility does not violate any applicable requirement of the approved State Implementation Plan developed under the Federal Clean Air Act, §110, as amended, and §330.15(d), which prohibits the open burning of waste at any municipal solid waste landfill facility, and includes particulate matter, nuisance odors, and visible emissions requirements. The site will comply with all the applicable air quality rules and regulations. The site will be required to operate in accordance with the New Source Performance Standards (NSPS) for MSW landfills.

19.2 Odor Management Plan

Specific methods to control potential odors on the site will vary dependent upon the potential odor source. In general, the following will apply to most odor sources:

- Minimize the size of the working face to minimize odors
- Spills of odorous materials should be immediately cleaned up or properly covered
- Repair areas where soil cover has eroded by placing additional cover material.
- Identify any waste stream that requires special attention to control odor. If the Scale Operator notes a load with significant odors, they will notify the working face personnel. The load will be promptly covered with soil or solid waste when it arrives at the working face.
- Removal of leachate from the site should be performed under appropriate weather conditions.
- Prevent ponded water, as outlined in Section 28 of the SOP.
- Evaluate the possible use of misters and chemical deodorizers when other controls do not reduce or eliminate significant odors. If it is determined that misters or deodorizers will help minimize odors, a permit modification or other applicable authorization will be submitted to TCEQ for approval.
- Evaluate the perimeter of the site on days when the site is open for waste acceptance to assess the performance of site operations to control odors.

Odor control, as it applies to specific operations and various unloading areas, is summarized in the following Table 19-1:

Table 19-1 Odor Control Measures

| Operation or Unloading Area | Odor Control Measures |
|------------------------------------|---|
| Landfill gas management | Arid climate prevents development of significant gases detectible by smell. No gas connection system operated at the site. |
| Working face | Immediately cover odorous materials. Repair eroded areas by recovering. |
| Grease trap waste | Potential odors from grease traps do not emanate from this site, as these wastes are not currently accepted at the facility. |
| Septage | Dried sludge from the water and wastewater treatment plant are accepted at the landfill (see Section 8.6 – City of Del Rio Special Waste Acceptance Procedures – which states that quantities of sludge accepted at the landfill will be limited to that which can be adequately handled at the landfill without creating odor problems. |
| Ponded water | Any unaffected stormwater that is ponded on the site shall be controlled to prevent the occurrence of nuisance odors as discussed in Section 28 – Ponded Water. If ponded water produces objectionable odors, the area should be drained or pumped dry, and the low area filled with soil and regraded to promote proper drainage. |
| Dead animals | Dead animals will be received and properly disposed of as outlined in Section 8.6. Proper handling will minimize odors from this source. |
| Leachate | Leachate is collected through the leachate collection system, which drains to a leachate collection sump. The leachate pump is located in the leachate sump, at the bottom of a riser pipe. The leachate is pumped through a closed system and discharged directly into a tanker truck. The leachate is transported to a sewer manhole inside the landfill property and discharged. The potential odors from leachate management are very minimal. The riser pipes for cleanout of the leachate collection system are capped to prevent any landfill gas or leachate odors from escaping. The leachate pump riser pipe is capped at the ground surface, and the leachate pump is located below grade in the sump on the bottom liner, minimizing the potential for odor generation. The leachate collection system cleanout riser and sump riser pipe caps and leachate piping should be inspected monthly and maintained to minimize the potential for escaping odors. These inspection and maintenance activities should be documented in the facility records. |

20.0 DISEASE VECTOR CONTROL

The operator personnel will control on-site populations of disease vectors, which include rodents, excessive bird populations, flies, mosquitoes, and other insects or animals capable of transmitting diseases to humans. The primary means of control will be to prevent, inhibit, or deter vectors from coming into contact with deposited waste through proper waste compaction and daily cover application. Waste deposited at a working face area will be promptly compacted. Daily cover and/or ADC will be applied at the end of each operating day in accordance with Section 27.

Documentation of these inspections will be maintained in the Site Operating Record. Birds will be controlled by properly covering the waste as soon as possible in order to reduce their food source. Site personnel shall report any problems with rodent and insects to supervisor. Mosquitoes will be controlled by preventing stagnant water for developing on the site. If site inspections identify the need for additional vector controls, the site will contract with a licensed commercial pesticide applicator, or other qualified pest control specialist to perform the following services:

- Insect and rodent control within enclosed structures.
- Implement the additional vector management practices.
- Assist in the development of vector specific awareness training materials for site personnel.
- Assist the site in distributing these training materials and providing any necessary training activities on vector awareness and control for site personnel.

21.0 SITE ACCESS ROADS

21.1 All Weather Roads

As a part of the overall site maintenance program, facility personnel will collect any windblown waste materials on a daily basis, which have been trapped on-site, in drainage channels and on the access roads.

On-site access roads will be maintained to be freely draining, passable by transportation vehicles in two directions, and free from excessive ruts. The road to the inclement weather disposal area will be maintained as an all-weather road, with an asphalt surface. This should facilitate movement of traffic into and out of the site during waste acceptance hours. Roadways shall be inspected weekly to determine the need for maintenance and regrading. Inspections should be documented as a part of the facility operating records. Regrading or repairs should be performed weekly, or as necessary to minimize ruts, potholes, or other depressions which may affect vehicle traffic. These activities should also be documented in the facility operating records.

Solid waste transportation vehicles arrive at the working face at random intervals throughout the day. Often there are a number of vehicles unloading waste at the same time while other vehicles are waiting. Operations at the working face will be conducted in a manner which will encourage the efficient movement of transportation vehicles to and from the working face, and to expedite the unloading of solid waste.

The approach to the working face will be maintained such that 2 or more vehicles may safely unload side-by-side. An adequate turning area for hauling vehicles will be provided (typically a 100' maneuvering area at the active face), and a vehicle turn-around area large enough to enable vehicles to arrive and turn around safely with reasonable speed will be provided adjacent to the unloading area. The vehicles will be directed back to a vacant area near the working face to unload. Upon completion of the unloading

operation, the transportation vehicles will immediately leave the working face area. On-site personnel will direct traffic as necessary to expedite safe movement of vehicles.

All on-site access roads will be maintained in a reasonably dust-free condition by periodic spraying from the facility's water truck. The water truck will be filled from a nearby fire hydrant.

Heavy equipment at the site will be used as necessary to control or remove mud accumulations on on-site roads. The City will also maintain a stockpile of crushed rock, recycled concrete, masonry demolition debris, recycled asphaltic concrete pavement (RAC) or other similar material for use in maintaining passable access roads during wet weather.

All-weather roads will be used during inclement periods. The site personnel will barricade unimproved interior access roads during hours of operation in wet weather. The barricades will remain in place until site personnel verify that the unimproved roads can be accessed in a safe and reasonably mud-free condition.

The length of paved entrance road from the access gate to the active landfill has been adequate for the past 15 years to control mud from vehicles departing the site to off-site access roads. However, if the current methods of mud control become ineffective, the site will add crushed-stone surface or similar material surface to provide for all weather access area from the unloading areas to public access roads (i.e., mud on vehicles will "spin off" on the access roads within the landfill before the vehicle returns to the public access road). Tracked mud and associated debris will be removed at least once per day on days when mud is being tracked onto public roadways. Suitable equipment (e.g., motor grader, loader with brush attachment, or street sweeping equipment) will be used to minimize road depressions, ruts, and potholes, will be accomplished by suitable equipment. Documentation of the mud and debris inspection and abatement measures should be maintained in the site records.

The City shall maintain the paved access road to the Landfill. The Landfill Operator shall be responsible for the maintenance of the working roads within the landfill cell and all on site roadways within the permit boundary.

Site operation will continuously reserve disposal areas adjacent to all-weather access roads for wet weather disposal.

21.2 Particulate and Dust Control

Dust and particulate control shall be maintained by periodic applications of water to the access roads during dry, windy, and/or dusty periods by the Landfill Operator. Water truck(s) may be used for dust control and moisture conditioning of soil materials, as necessary. In addition, water contained in basins or excavations may be used for dust control.

22.0 SALVAGING AND SCAVENGING

Salvaging refers to the controlled diversion of certain items with the intent to recycle these items. The landfill may direct various items, such as white goods, to a designated area for recycling; however, salvaging shall not interfere with prompt disposal of solid waste received at the site. Salvage items will be removed often enough to prevent becoming a nuisance, preclude the discharge of any pollutants, or to prevent an excessive accumulation of material. Recyclable items shall be handled according to Section 18 – Disposal of Large Items. Pesticide, fungicide, rodenticides, or herbicide containers shall not be salvaged. Class I industrial and other special wastes received at the disposal facility must not be salvaged.

Scavenging refers to the uncontrolled, unauthorized diversion or removal of waste in the system. Scavenging will not be allowed and individuals will be properly informed of this policy, and any waste scavenged will be returned to the working face for disposal.

23.0 ENDANGERED SPECIES PROTECTION

Neither endangered or threatened species, nor any critical habitat of such species have been identified on the site. The operation of the site will not contribute to or cause the destruction or adverse modification of any critical habitats, nor will it contribute to or cause the taking of any endangered or threatened species.

CP&Y, Inc. conducted two habitat assessment field reconnaissance on June 23-24, 2020, and September 14, 2022. No federally listed endangered, threatened, or candidate species were observed within the project area during the field investigation. The site is not a suitable habitat for any federally listed species endangered and threatened. The coordination with the US Fish and Wildlife Services and Texas Parks and Wildlife Services is included in Appendix I/IIB.

Neither the facility nor its operation will result in the destruction or adverse modification of critical habitat of endangered or threatened species or cause the taking of any endangered or threatened species. If endangered or threatened species are encountered during site operations, site operations will be stopped and the area will be protected while notification and coordination for the appropriate action with the Texas Parks and Wildlife Department and U.S. Fish and Wildlife Service is performed.

24.0 LANDFILL GAS CONTROL

The Landfill Gas Management Plan will be followed to monitor and evaluate the migration of methane gases in accordance with §330.371. Perimeter monitoring of methane will be conducted on a quarterly basis, and samples of gas from probes installed at evenly spaced intervals not to exceed 1000 feet will be analyzed and checked against the allowable maximum of the LEL (lower explosive limit). Methane detection for on-site structures is also conducted in accordance with the Landfill Gas Management Plan. Gas monitoring will continue for the life of the landfill and for the closure and post-closure periods of the facility. Landfill gas report and submittals must be maintained in operating record.

Should methane levels exceed the LEL at the perimeter probes, the City will engage a professional engineer to configure a gas recovery system to reduce the methane concentrations. Methane gas concentrations shall not exceed 25% of the LEL in facility structures.

If methane gas concentrations exceed the limits specified above, facility personnel will take the following steps per §330.371:

Immediately

- Take steps to protect human health
- Contact the TCEQ ED
- Additionally, contact local and county officials, emergency officials, and the public as appropriate. Refer to Appendix IIIM – Landfill Gas Management Plan, Section 4.2 for contact information.

Within 7 Days

- Update the Site Operating Record with a report documenting the gas levels detected, and the steps taken to protect human health.

Within 60 Days

- Implement a remediation plan for the methane gas releases. A copy of this plan must be included in the Site Operating Record, and a copy sent to the ED.

All gas management reports and analytical data shall be included in the Site Operating Record and submitted to the ED.

25.0 OIL, GAS, AND WATER WELLS

No producing oil, gas, or water wells are located within the permit boundary, and no abandoned wells have been identified. If an abandoned oil, gas, or water well is discovered during the continued development and operation of the facility, the ED shall be notified in writing within 30 days. The well shall be capped, plugged, and closed in accordance with the TCEQ and/or Railroad Commission of Texas Rules and Regulations. Within 30 days of the well plugging, the facility operator shall notify the ED in writing to verify that the well has been properly capped, plugged, and closed, and a copy of the well plugging reports will be submitted to the ED.

If a well is encountered, abandoned, and plugged, it will be necessary to submit a permit modification to the ED for approval if such well abandonment will cause any changes to the liner installation plan. The ED may approve any well used to supply water at the facility that is located within the permit boundary if it is determined that the well is outside the waste footprint, it is not impacted by landfill operations, it can be demonstrated that well design and installation will prevent any cross-contamination from the waste management unit to the water well production zone and between any water bearing zones, and an approved sampling plan to include frequency and parameters is in place.

26.0 COMPACTION

Compaction of waste loads will be carried out to minimize future consolidation and settlement and provide for the proper application of daily, interim, and final cover. The equipment operator's training shall include the expertise necessary to know when the desired compaction has been achieved. Compaction also provides for fire protection and litter control.

Waste loads will be deposited, as directed by the spotter, at the working face, and quickly spread into layers to be compacted. Compaction of the waste will be accomplished by repeated passages of landfill compaction equipment over the waste material. The thickness of a typical lift compacted waste is approximately 2 feet. Compaction of this layer with 5 passes of the equipment will follow immediately.

27.0 LANDFILL COVER

27.1 Daily Cover

The landfill will apply 6 inches of well-compacted earthen material not previously mixed with garbage, rubbish, or other solid waste to control disease vectors, fires, odors, windblown litter or waste, and scavenging, unless the executive director requires a more frequent interval. The goal will be to provide a sufficient stock pile for a minimum of 6 inches of daily cover soil for one day's accumulation of solid waste such that in the event of inclement weather, the active fill can be covered and wet weather operations initiated. Alternate daily cover (tarps), as approved by the TCEQ, will also be used at the site.

When soil materials are used for daily cover, they will be compacted with a minimum of 5 passes by the landfill equipment to minimize infiltration of storm water. After soil placement, there should be no waste materials visibly protruding through the cover.

On-site soils are suitable for cover material. Approved alternative daily cover (ADC) for this site consists of tarpaulins, stored adjacent to the working face. Available soil cover material will also be stockpiled adjacent to the working face for emergency fire control. Daily cover shall be inspected daily for proper placement and recorded in the site operating record.

27.2 Alternative Daily Cover

Tarpaulins (tarps) are used for alternative daily cover at the site, as approved by the TCEQ, the approval is included in Appendix IV-A. Tarps are placed to completely cover the compacted waste. The tarps are removed the following day and more waste is placed over the previous day's waste. Alternative daily cover (ADC) may not be used when the landfill will be closed for longer than 24 hours. ADC Operating Plan is included in Appendix IV-A of this SOP. The plan addresses the following items:

- Description of the alternative cover material
- Effect of ADC on vectors, fires, odors, and windblown litter
- Application and operational methods to be utilized at the site when using the ADC
- Chemical composition of the material and the SDS(s) for the ADC

27.3 Intermediate Cover

All areas that have received waste but will be inactive for longer than 180 days will have intermediate or final cover. Interim cover soil will consist of clean soils (not previously in contact with solid waste), spread evenly over the daily cover and compacted to a thickness of at least one foot, capable of sustaining native plant growth and must be seeded or sodded following its application in order to control erosion, or must be a material approved by the executive director that will otherwise control erosion. Intermediate cover must be graded and maintained to prevent ponding. Plant growth or other erosion control features must be maintained. Runoff from areas that have intact intermediate cover is not considered as having come into contact with the working face or leachate. As filling operations progress vertically, a portion of the interim cover may be removed to leave no less than 6 inches of soil prior to placement of the subsequent waste cell. Interim cover may remain in place prior to placement of the final cover soil layers, or may be removed as the final cover is placed. Site personnel should inspect intermediate cover monthly, and after major rainfall events for erosion. Eroded areas should be repaired within 5 days of discovery, weather permitting. The performance of the periodic inspections and conducting of repair operations on intermediate cover areas should be documented in the facility records.

27.4 Final Cover

Landfill final cover shall be performed in accordance with the Final Closure Plan, of the permit amendment and Subchapter K of Chapter §330. The final cover must be inspected and maintained throughout the site life and post-closure period. Pertinent information is contained in the final closure plan.

Final cover shall consist of an 18-inch thick infiltration layer overlain by a 12-inch-thick erosion layer on the 5 percent slope and a 24-inch layer on the 25 percent slope. The top 6 inches of the erosion layer shall be top soil possessing the characteristics of representative soils on the site that produces growth of grass or other vegetation. The closed area will be seeded with native grasses suitable for the arid climate. The infiltration layer will be placed in 6-inch lifts and compacted to 90% of the maximum dry density determined using the modified Proctor methods (ASTM D1557). Density testing shall be one (1) density test for each 8,000 square feet of surface area per lift. Permeability testing shall be a minimum of one (1) test per surface acre. The minimum permeability shall be 1×10^{-7} cm/sec. The erosion layer compaction shall be achieved by the dozer spreading operation. The final 6 inches shall not be compacted.

27.5 Cover Log

Throughout the landfill operation, a cover application log for daily, intermediate, and final cover will be maintained and readily available for inspection in accordance with the TCEQ Rules & Regulations. The log will specify the date (or period of time) the cover was applied, and the thickness and materials applied, how it was accomplished, and the last area covered, for daily and intermediate cover. For final cover, this record shall specify the area covered, the date cover was applied, and the thickness applied that date. Each entry will be certified by the signature of an on-site supervisor that the work was accomplished as stated in the record. The cover inspection record must document inspections required under Section 330.165(h) concerning erosion of cover, the findings and corrective actions taken when necessary.

27.6 Erosion of Cover

Erosion gullies or washed-out areas deep enough to jeopardize the final or intermediate cover will be repaired within 5 days of detection by restoring the cover material, grading, compacting, and seeding unless the commission's regional office approves otherwise, based on the extent of the damage requiring more time to repair or the repairs are delayed because of weather conditions. An eroded area is considered to be deep enough to jeopardize the final or intermediate cover if it exceeds 4 inches in depth as measured from the vertical plane from the erosion feature and the 90-degree intersection of this plane with the horizontal slope face or surface. The date of detection of erosion and date of completion of repairs, including reasons for any delays, will be documented in the cover inspection record noted in Section 27.5. The integrity of landfill cover will be inspected on the next working day following any significant rainfall event occurring at the site. Inspections will occur at a minimum, weekly during the active fill life, and at least monthly during the post-closure period. Repairs should be promptly completed and the areas reseeded. Post-closure care and inspection procedures are outlined in Appendix IIIIF, Post-Closure Care Plan.

28.0 PONDED WATER

As an on-going routine, the City will construct a series of dikes and detention structures on-site to control rainfall runoff and direct it away from the active fill area. Temporary ditches and sumps will be progressively constructed and advanced in coordination with the progressing active fill area. Runoff will be collected and diverted in areas above the excavation and directed to the perimeter drainage features. Water collected in the excavation area prior to placement of the first deposit of solid waste, or ponded water that has not come into direct contact with solid waste, will be treated as uncontaminated water and pumped off-site per the TPDES permit. Water in contact with the working face or potentially in contact with solid waste, including runoff from daily cover soil, runoff immediately adjacent to the working face area, runoff from the bermed portion of the active area adjacent to the working face and ponded water, will be considered as contaminated water. The active fill area will at all times be contained by a perimeter dike/berm of sufficient dimensions to both retain a 25-year 24-hour storm flow from the contaminated flow area, and to prevent on-flow from the uncontaminated flow area. In the event that uncontaminated water flows over the active fill perimeter dike/berm, the water will be handled as contaminated water.

The contaminated ponded water shall be managed in accordance with the Appendix IIIC Leachate and Contaminated Water Plan. The Plan requires the use of berms to segregate contaminated runoff from uncontaminated runoff in parts of the cell that have not yet received waste. As operations progress to aerial fill, an intermediate layer of soil will be placed over areas that remain inactive for more than 30 days, and are not filled to final grade. A drainage layer shall be placed above the compacted clay liner to allow leachate to flow laterally to perforated collection pipes that take the leachate to collection sumps for delivery through a sewer manhole, to the wastewater treatment plant.

During and after extended wet weather conditions, the active site shall be inspected daily for ponding water and for integrity of the perimeter dike. Ponded water shall be drained to the leachate collection system and the low area filled to allow drainage as soon as weather conditions allow. During rainy weather, the area of the working face shall be contained as much as possible to minimize any potential leachate production.

Active areas and previously land-filled areas with intermediate or final cover will be periodically monitored to identify potential ponding issues. The ponding of water over areas where waste has been placed shall be prevented or promptly eliminated after identification. Areas should be properly sloped to prevent ponding. The site should be inspected monthly, and after rainfall events to identify areas of ponding that require correction. These activities should be recorded in the facility records.

29.0 WASTE IN ENCLOSED CONTAINERS AT TYPE IV LANDFILLS

There is no waste in enclosed containers at the City of Del Rio Landfill. (This section is not applicable to this site as it is a Type 1 Facility). The facility is not a storage or processing facility. However, recyclables noted in Table 8-2 will be temporarily stored as they are collected prior to pickup for recycling. The containers for collection and temporary storage are noted in Table 8-2 and are located outside of any building and outside of the permit boundary. They are not part of this permit.

30.0 DISPOSAL OF SPECIAL WASTE

The landfill is permitted to receive only municipal solid waste and those special solid waste allowable under §330.171. The site is not authorized to receive hazardous waste regulated by the TCEQ, PCB waste, or prohibited waste as discussed in Section 8.

Special waste will not be handled at this landfill except in accordance with TCEQ Rules & Regulations, and only when appropriate provisions have been made at the site for proper disposal. City ordinance currently prohibits receipt of any special waste, with the exception of medical waste, municipal water/wastewater sludges, slaughterhouse waste, dead animals, pesticide containers, and RACM in accordance with Section 8.6 of this SOP. If other special waste is considered in the future for disposal at this site, approval must be obtained from the TCEQ as outlined in §330.171.

31.0 DISPOSAL OF INDUSTRIAL WASTE

This site does not accept Class I Industrial Waste. Class II and Class III Industrial Waste may be accepted, provided disposal of these waste does not interfere with the proper operations of the facility and the waste acceptance plan required by §330.61(b). The Waste Acceptance Plan is included in Appendix I/II.E. Class 2 industrial solid waste, except special waste as defined in 330.3 may be accepted provided the acceptance of this waste does not interfere with facility operations.

32.0 VISUAL SCREENING OF DEPOSITED WASTE

The landfill site is located in a relatively undeveloped area generally remote from residential property. The setting for the landfill features relatively flat topography with desert vegetative cover. The City's old closed-out landfill and City-owned property borders the landfill to the northwest. Undeveloped desert landscape borders the landfill on the remaining sides. A buffer zone of at least 50 feet wide and, in most areas, several hundred feet wide, surrounds the property. The nearest residence is located approximately 350 feet away from the permit boundary on the south side of the facility. Refer to the Land Use Map on Figure I/II-7.1 located in Parts I/II. If the Executive Director determines that additional screening is necessary, it will be provided.

33.0 CONTAMINATED WATER DISCHARGE

All water coming in contact with waste or contaminated soils shall be treated as contaminated water. Contaminated water shall be controlled by site personnel as described in Section 28.1, and shall not be discharged from the facility without prior written authorization from the TCEQ. All wastewaters generated by the facility shall be managed as contaminated water.

33.1 Minimizing Contaminated Water

The discharge of contaminated water shall be controlled/prevented by site personnel by making weekly inspections of the berm/dike system to assure that the 24-hour, 25-year rainfall event can be managed and make repairs to the system if required. All reasonable steps shall be taken to prevent water from coming into contact with solid waste to allow contamination. Such steps include minimizing the working face to the maximum necessary to handle the incoming waste and providing berms in the active cell to separate active and inactive areas of fill. Site personnel shall inspect the active landfill weekly and after each rainfall event for ponded water and areas where the potential for ponded water may occur (low areas). The leachate collection system, to include the leachate collection sump and pump, will be inspected weekly to assure proper operation.

33.2 Disposal of Contaminated Water and Leachate

The City of Del Rio Landfill has an arrangement with the Wastewater Treatment Plant serving this area for disposition of leachate. The Landfill Operator is responsible for collecting leachate from the leachate collection system into a suitable tank truck. Once approved by the WWTP, the leachate is then pumped into a Sewer manhole within the landfill property. From this manhole, the wastewater piping delivers the leachate to the WWTP. The manhole is located inside the landfill fencing, approximately 110 feet from the main entrance gate. The manhole is approximately 4.5 ft in diameter, 10 ft deep, and has a metal manhole cover which reads "Wastewater – Sewer". If the WWTP ever rejects the collected leachate, disposal with a local hazardous waste management company shall be arranged.

The facility will be operated in accordance with its SWPPP (Texas Multi-sector General Permit TXR050000 and Stormwater Permit TXR05BY31), and in accordance with 30 TAC 330.55(b) and 330.167.

34.0 LEACHATE AND GAS CONDENSATE RECIRCULATION

The landfill does not recirculate leachate or landfill gas condensate.

35.0 SITE INSPECTION AND MAINTENANCE LIST SUMMARY

The table on the following page summarizes the various site inspections that are completed on a recurring bases. The person responsible for the inspection, the frequency, and the reference within this Site Operation Plan are shown.

Site Inspections are summarized here and any corrective actions taken shall be documented in the Site Operating Record.

| ITEM INSPECTED | TASK | Frequency | Inspector | Referenced In this SOP |
|--|--|--|---|-------------------------------|
| Fence/Gates | Inspect perimeter fence and gates for damage. Make repairs if necessary. | Weekly | Landfill Coordinator or Designee | Section 10.2 |
| Windblown Waste | Police working face area, access roads, entrance areas, and perimeter fence for loose trash. Clean up as necessary. | Daily | Landfill Superintendent or Designee | Section 14 |
| Waste Spilled on Route to the Site | Police the entrance areas and all roads at least 2 miles from the site entrances for loose trash. Clean up as necessary. | Daily | Landfill Superintendent or Designee | Section 17 |
| Landfill Markers | Inspect all landfill markers for damage, color-coding, and general location. Correct or replace damaged markers within 15 days of discovery. | Monthly | Landfill Coordinator or Designee | Section 16.1 |
| Site Access Road | Inspect site access road for damage from vehicle traffic, erosion, or excessive mud accumulation. Maintain as needed. Grading equipment will be used control or remove mud accumulations on roads as well as minimize depressions, ruts, and potholes. | Daily – more often during wet weather or extended dry weather periods. | Landfill Coordinator & Superintendent or Designee | Section 21 |
| Daily Cover | Inspect for erosion, proper placement, thickness, and compaction. Correct problems as needed. Verify that vectors are not an issue. | Daily at the active face and all daily cover areas will be inspected. | Landfill Superintendent or Designee | Section 27.1 |
| Intermediate Cover | Inspect for proper placement, thickness, erosion, compaction, settlement, and for presence of waste or other contamination. Correct problems as needed. | Weekly and within 72-hours of a rainfall event of 0.5 inches or more. | Landfill Superintendent or Designee | Section 27.3 |
| Final Cover | Inspect for proper placement, thickness, compaction, slope, settlement and erosion. Maintenance will be ongoing throughout post-closure care period. Correct problems as needed. | Weekly and within 72-hours of a rainfall event of 0.5 inches or more. | Landfill Superintendent or Designee | Section 27.4 |
| Leachate | Measure depth of leachate in sump, as required. | Weekly | Landfill Coordinator or Designee | Section 33 |
| Leachate Odor | Inspect the caps and piping of the cleanout riser and sump riser of the leachate collection system to prevent potential odor escape. | Monthly | Landfill Coordinator or Designee | Table 19.1 |
| Site Signs | Inspect all site signs for damage, general location, and accuracy of posted information. | Weekly | Landfill Coordinator or Designee | Section 13 |
| Ponded Water | Inspect site for ponded water areas. Correct problems as needed. | Weekly and within 72-hours of a rainfall event of 0.5 inches or more. | Landfill Superintendent or Designee | Section 28 & 33 |
| Odor | Inspect the perimeter of the site to assess the performance of site operations to control odor. | Daily | Landfill Coordinator & Superintendent or Designee | Section 19.2 |
| Perimeter Channels/Ponds/Chutes/Swales | Inspect perimeter channels, berms/dikes, chutes and swales for erosion, settlement, obstructions, silt and sediment build-up to verify that they are functioning as designed. Inspect for presence of sediment discharges along the site boundary in areas which have been disturbed by site activities. | Weekly and within 72-hours of a rainfall event of 0.5 inches or more. | Landfill Coordinator & Superintendent or Designee | Section 33 |

CITY OF DEL RIO LANDFILL

VAL VERDE COUNTY, TEXAS
TCEQ PERMIT NO. MSW-207C

MAJOR PERMIT AMENDMENT APPLICATION PARTS IV – SITE OPERATING PLAN

APPENDIX IV-A ALTERNATE DAILY COVER OPERATING PLAN

Prepared for
City of Del Rio

September 2023
Revision 1 August 2024



Prepared by
CP&Y an STV Company
TPBE Registration No. F-1741
13155 Noel Road, Suite 200
Dallas, TX 75240

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Appendix IV-A-1 – Synthetic Tarp Approval and Specification



1.0 INTRODUCTION

This Alternate Daily Cover Operating Plan (ADCOP) has been prepared for the City of Del Rio Landfill consistent with §330.165(d). The purpose of this ADCOP is to address the following issues:

- Description of the Alternative Daily Cover (ADC) material
- Chemical composition of the material and the Material Safety Data Sheets (MSDS) for the ADC (if applicable)
- Operation methods to be utilized at the site when using the ADC
- Effect of the ADC on vectors, fires, odors, and windblown litter

As specified in the Site Operating Plan (SOP), the facility's operating hours are currently 7:00 am to 7:00 pm, Monday through Friday, and 7:00 am to 2:00 pm on Saturday. Consistent with the SOP, 6 inches of compacted earthen material will be applied at least once every 24 hours. ADC may also be used to cover exposed waste in lieu of soil daily cover. However, if the area in which ADC has been used is not filled over with waste within 24 hours, the area will be covered with a minimum of 6 inches of daily cover soil.

2.0 MATERIAL CHARACTERISTICS

2.1 Description of ADC Material

Synthetic tarps to be used as ADC material consist of a high-density woven polyethylene coated fabric. Panels of the fabric are heat welded together for the desired width. A series of high tensile strength nylon web straps are sewn around the perimeter of the synthetic tarps for added strength. The TCEQ approval letter and typical specifications for the synthetic tarps proposed to be used as ADC are included in Appendix IV-A-1. All tarps used as ADC will meet or exceed the material specifications included in Appendix IV-A-1.

2.2 Chemical Characteristics

Typical chemical characteristics of the synthetic tarps are included in Appendix IV-A-1. The synthetic tarps are not reactive, ignitable, or corrosive under the expected conditions (i.e., high temperature, intense sunlight).

3.0 OPERATIONAL METHODS

This section discusses the operational procedures that will be used to employ the approved ADC material. Site personnel will verify that the waste fill area has been covered at the completion of each working day.

Using standard landfill equipment and site personnel, the tarp(s) will be manually placed over the waste and weighted (to secure the sides and ends with materials such as chains, cables, soil, rock, or other heavy items). If reusable tarps are used, the tarps will be removed within 24 hours of their application and prior to waste placement. Tarps may be used in combination with soil or other approved ADC material to provide complete coverage of the working face. Tarps will overlap each other on the active face perimeter to ensure complete coverage. Up slope tarps will lap over down slope tarps in a shingle-type fashion to minimize stormwater infiltration into the underlying waste.

In addition, tarps may be used in combination with other approved ADC material to further control windblown waste, odors, and vectors at the facility.

Tarps will be inspected each day that they are used for ADC. Inspections will include looking for holes, tears, and the overall condition of the tarp. When any holes or tears are discovered, the condition and performance of the tarp will be assessed and documented in the cover log. Holes and tears determined to be large enough to affect the tarp's ability to function as an ADC will either be repaired, or the tarp will no longer be utilized as ADC.

Stormwater that comes in contact with the tarps during use or storage will be treated as contaminated water.

4.0 ADC MATERIAL PERFORMANCE AND INSPECTION PROCEDURES

4.1 ADC Performance

The ADC material included in this plan has been successfully used at MSW landfill sites in Texas to control vectors, fires, odors, and windblown litter and waste.

The synthetic tarp ADC materials specified in this plan serve as a physical barrier over waste. The synthetic tarp ADC will control vectors, windblown waste, and odor, and will minimize fire hazards by creating a physical barrier between the atmosphere and waste. The tarps are not flammable, are sufficiently heavy, and will be properly anchored to remain positioned over waste when in use.

4.2 Verification and Inspection Procedures

At the end of each working day, landfill personnel will inspect the working face to verify that the synthetic tarp has been placed over the working face in accordance with this ADCOP. Landfill personnel will routinely (quarterly at a minimum; see Section 5) assess the effectiveness of each ADC in controlling vectors, fires, odors, and windblown litter and waste. Daily application of ADC will be documented and maintained in the Site Operating Record.

In the event that the ADC does not control vectors, fires, odors, or windblown waste, then the ADC application process will be re-evaluated to verify that this ADC material adequately covers the working face and serves its intended purpose. Any required changes to the ADC operational procedures will be documented in the Site Operating Record.

5.0 STATUS REPORTS

In accordance with Title 30 TAC §330.165(d), the site will obtain a temporary authorization before trial use of a new ADC. Consistent with Title 30 TAC §330.165(d)(2), a status report for new ADC materials will be submitted on a 2-month basis to the TCEQ describing the effectiveness of the alternative materials, any problems that may have occurred, and corrective actions required as a result of such problems. If no problems occur within 6 consecutive months of use, a permit modification completed consistent with Title 30 TAC §305.70(k)(1) will be submitted to the TCEQ to use the new ADC materials on a permanent basis.

APPENDIX IV-A-1
SYNTHETIC TARP APPROVAL AND SPECIFICATIONS

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION



MODIFICATION TO

MUNICIPAL SOLID WASTE PERMIT N° MSW-207A

City of Del Rio Municipal Landfill, Val Verde County

Municipal Solid Waste Permit No. MSW-207A is hereby modified as follows:

Description of Change:

Permit Modification to use Alternate Daily Cover (ADC). The City will use manually-applied reusable 50' X 50' tarps. The maximum working face is approximately 40' X 75' and can be covered easily by two tarps consisting of woven coated polypropylene fabric as manufactured by Linq Industrial Fabrics, Summerville, South Carolina. The thickness is 22 mils and the weight is 6.5 ounces per square yard. The cover has safety webbing around its entire outer edge with heavy-duty straps and "D" rings every 10 feet.

A status report on the ADC will be submitted on a quarterly basis to the executive director in accordance with 30 TAC §330.133(c)(2). This report will describe the effectiveness of the ADC, any problems that may have occurred, and corrective actions required because of such problems.

Permit Sections Revised:

Site Operating Plan

This modification is a part of Permit No. MSW-207A and should be attached thereto.

APPROVED, ISSUED, AND EFFECTIVE in accordance with 30 Texas Administrative Code Section 305.70(g)(16).

ISSUED DATE:

SEP 13 2000

A handwritten signature in black ink, appearing to read "Jeffrey A. Duto".

For the Commission

**MATERIAL SAFETY DATA SHEET**

LING INDUSTRIAL FABRICS, 2550 WEST FIFTH NORTH STREET, SUMMERVILLE, SC 29483

WOVEN COATED POLYPROPYLENE FABRIC
(IBC SERIES)PAGE: 1
DATE PREPARED: 3/4/99
MSDS NO: IBC-1008**SECTION 1 PRODUCT IDENTIFICATION & EMERGENCY INFORMATION**PRODUCT NAME: WOVEN COATED POLYPROPYLENE FABRIC
(IBC SERIES)CHEMICAL NAME:
PolypropyleneCHEMICAL FAMILY:
Blend of materials; primarily polypropylenePRODUCT DESCRIPTION:
White coated intermediate bulk container fabric (IBC)EMERGENCY TELEPHONE NUMBERS: LING INDUSTRIAL FABRICS (843) 873-5800
CHEMTREC (800) 424-9300**SECTION 2 HAZARDOUS INGREDIENT INFORMATION**

The following ingredients are listed as hazardous materials according to CFR1910.1200 (Hazardous Communication Standard-USA) and as controlled substances under WHMIS (Workplace Hazardous materials Information System-Canada)

PIGMENTS: NOT APPLICABLE
VEHICLE: NOT APPLICABLE
ADDITIVES: NOT APPLICABLE**IMPORTANT NOTE:**

PIGMENTS, VEHICLES, AND ADDITIVES ARE FULLY ENCAPSULATED IN RESIN AND ARE NOT EXPECTED TO CAUSE ANY HAZARDOUS CONDITIONS WHEN PROCESSED IN ACCORDANCE WITH GOOD MANUFACTURING PRACTICES.



MATERIAL SAFETY DATA SHEET

LINQ INDUSTRIAL FABRICS, 2560 WEST FIFTH NORTH STREET, SUMMERVILLE, SC 29483

WOVEN COATED POLYPROPYLENE FABRIC
(IBC SERIES)

PAGE: 2
DATE PREPARED: 3/4/99
MSDS NO: IBC-1008

SECTION 3 HEALTH INFORMATION AND PROTECTION

NATURE OF HAZARD

EYE CONTACT:

Particulates may scratch eye surfaces/cause mechanical irritation

SKIN CONTACT:

No hazard in normal industrial use.

INHALATION:

No hazard in normal industrial use.

INGESTION:

No hazard in normal industrial use.

FIRST AID

EYE CONTACT:

This product is an inert solid. If in eye, remove as one would any foreign object. If irritation persists, contact physician.

SKIN CONTACT:

Wash with soap and water. If irritation persists, contact physician.

INHALATION:

In case of adverse reaction, immediately remove the affected victim from exposure to fresh air. If adverse conditions persist, contact physician.

INGESTION:

First aid is normally not required.

WORKPLACE EXPOSURE LIMITS

No workplace exposure limits have been established for this product.

OSHA REGULATION 29CFR1910.1000 REQUIRES THE FOLLOWING PERMISSIBLE EXPOSURE LIMITS

5 mg/m³ (respirable dust), and 15 mg/m³ (total dust) based on the OSHA PEL for nuisance dust.

The recommended permissible exposure levels indicated above reflect the levels revised by OSHA in 1989 or in subsequent regulatory activity. Although the 1989 levels have since been vacated by the 11th Circuit Court of Appeals, LINQ Industrial Fabrics recommends that the lower exposure levels be observed as reasonable worker protection.

THE ACGIH RECOMMENDS THE FOLLOWING THRESHOLD LIMIT VALUES:

a TWA of 10 mg/m³ (total dust) for nuisance dust.



MATERIAL SAFETY DATA SHEET

LINQ INDUSTRIAL FABRICS, 2550 WEST FIFTH NORTH STREET, SUMMERVILLE, SC 29483

WOVEN COATED POLYPROPYLENE FABRIC
(IBC SERIES)

PAGE: 3
DATE PREPARED: 3/4/99
MSDS NO: IBC-1008

PRECAUTIONS

PERSONAL PROTECTION

Not required in normal industrial use. Where overexposure by inhalation may occur and engineering, work practice or other means of exposure reduction are not adequate, approved respirators may be necessary.

VENTILATION

Local ventilation may be required to control dust.

SECTION 4 FIRE & EXPLOSION HAZARD

FLASHPOINT: 570 Deg F **NOTE:** Decomposes >570 degrees F

FLAMMABLE LIMITS: **NOTE:** Not Applicable

AUTOIGNITION TEMPERATURE: **NOTE:** >575°F for polypropylene

GENERAL HAZARD

Solid material, may burn at or above the flashpoint, and airborne dust may explode if ignited. If thermally decomposed, flammable/toxic gases may be released. Toxic gases will form upon combustion.

FIRE FIGHTING

Use water spray to cool fire exposed surfaces and to protect personnel. Isolate "fuel" supply from fire. Extinguish the fire by cooling with water spray. Respiratory and eye protection required for fire fighting personnel.

DECOMPOSITION PRODUCTS UNDER FIRE: CONDITIONS

Carbon monoxide and irritating smoke under oxygen lean conditions

SECTION 5 SPILL CONTROL PROCEDURE

LAND SPILL

Recover spilled material and place in suitable containers for recycle or disposal. Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.

WATER SPILL

Recover spilled material and place in suitable containers for recycle or disposal. Consult an expert on disposal of recovered material and ensure conformity to local disposal regulations.



MATERIAL SAFETY DATA SHEET

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SECTION 6 NOTES

No notes applicable.

SECTION 7 REGULATORY INFORMATION

DEPARTMENT OF TRANSPORTATION (DOT):
DOT HAZARD CLASS: Not Regulated
DOT IDENTIFICATION NUMBER: Not Available

FLASHPOINT: > 600°F. (for polypropylene)

TOXIC SUBSTANCES CONTROL ACT (TSCA):

This product contains the following chemicals subject to the reporting requirements of the Toxic Substances Control Act (TSCA):

None

CERCLA:

Under the Comprehensive Response, Compensation, and Liability Act, (CERCLA), certain releases to air, land, or water may be reportable to the National Response Center at 800-424-8802. Circumstances surrounding the release and cleanup determine reportability. This product is not subject to CERCLA reporting requirements.

SARA TITLE III:

Under the provisions of Title III, Sections 311/312 of the Superfund Amendments and Reauthorization Act (40CFR 372), this product is classified into the following hazard categories:

Not Hazardous.

This product contains the following chemicals subject to the reporting requirements of Section 313 of the Emergency Planning and the Community Right-to-Know Act of 1986, also known as Title III of SARA (Superfund and Reclamation Act) and of 40 CFR 372.

NONE

This information must be included in all MSDSs that are copied and distributed with this material



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OZONE DEPLETING SUBSTANCES

This product is not formulated with nor does the process utilize any known Class I or Class II Ozone Depleting Substances regulated by the EPA Clean Air Act (40CFR Part 82)

SECTION 8 TYPICAL PHYSICAL & CHEMICAL PROPERTIES

SP. GRAVITY:
0.90

VAPOR PRESSURE, mmHg at °F:
Not Applicable

SOLUBILITY IN WATER, WT. % AT °F:
Insoluble

VISCOSITY OF LIQUID, cST at °F:
Not Applicable

SP. GRAVITY OF VAPOR, at 1 ATM AIR = 1:
Not Applicable

FREEZING/MELTING POINT, °F:
Varies by grade/ > 225°F

EVAPORATION RATE, n-BU ACETATE = 1:
Not Applicable

BOILING POINT, °F:
Not Applicable

SECTION 9 REACTIVITY DATA

STABILITY:
Stable

HAZARDOUS POLYMERIZATION:
Will not occur

CONDITIONS TO AVOID INSTABILITY:
Not Applicable

MATERIALS CONDITIONS TO AVOID INCOMPATIBILITY:
Temperatures over 480°F/250°C may cause resin degradation

HAZARDOUS DECOMPOSITION PRODUCTS:
Olefinic or paraffinic hydrocarbons



MATERIAL SAFETY DATA SHEET

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SECTION 10 TRANSPORT AND STORAGE

U.S. DOT CLASSIFICATION:
Not Regulated

STORAGE TEMPERATURE, °F:
Ambient

LOADING/UNLOADING TEMPERATURE, °F
Ambient

STORAGE/TRANSPORT PRESSURE, mmHg:
Atmospheric

VISCOSITY AT LOADING/UNLOADING TEMPERATURE, cST
Not Applicable

SECTION 11 OTHER INFORMATION

None

REVISION SUMMARY:

Since JULY 7, 1995 this MSDS has been revised in Section(s): 7, 10.
Area Code updated 3/4/99.

| | | |
|--------------------------|-----------------------|-------------------------------|
| REFERENCE NUMBER: | DATE PREPARED: | SUPERSEDES ISSUE DATE: |
| MSDS-IBC-1008 | March 4, 1999 | October 25, 1995 |

HAZARDOUS DATA CONTAINED HEREIN WAS OBTAINED FROM RAW MATERIAL SUPPLIERS FOR ADDITIONAL PRODUCT INFORMATION CONTACT YOUR TECHNICAL SALES REPRESENTATIVE FOR ADDITIONAL HEALTH/SAFETY INFORMATION CALL (843) 873-5800

THIS INFORMATION RELATES TO THE SPECIFIC MATERIAL DESIGNATED AND MAY NOT BE VALID FOR SUCH MATERIAL USED IN COMBINATION WITH ANY OTHER MATERIALS OR IN ANY PROCESS. SUCH INFORMATION IS TO THE BEST OF OUR KNOWLEDGE AND BELIEF, ACCURATE AND RELIABLE AS OF THE DATE COMPILED. HOWEVER, NO REPRESENTATION, WARRANTY OR GUARANTEE IS MADE AS TO ITS ACCURACY, RELIABILITY OR COMPLETENESS. IT IS THE USER'S RESPONSIBILITY TO SATISFY HIMSELF AS TO THE SUITABILITY AND COMPLETENESS OF SUCH INFORMATION FOR HIS OWN PARTICULAR USE. WE DO NOT ACCEPT LIABILITY FOR ANY LOSS OR DAMAGE THAT MAY OCCUR FROM THE USE OF THIS INFORMATION NOR DO WE OFFER WARRANTY AGAINST PATENT INFRINGEMENT.

**APPENDIX IV-B
LANDFILL CHECKLIST**

CITY OF DEL RIO MUNICIPAL LANDFILL CHECKLIST

Evaluator _____

Date of Review _____

Weather Conditions _____

| | | Yes | No |
|-----------|--|-------|-------|
| A. | <u>Entrance and Roadways</u> | | |
| 1. | Are the required signs posted (Hours, Rates, No Hazardous Waste)? | _____ | _____ |
| 2. | Is the entrance secured when the site is not in use? | _____ | _____ |
| 3. | Are the roadways to the landfill and entrance cleans and free of litter; does the entrance have a neat appearance? | _____ | _____ |
| 4. | Are the access roads to the landfill and the temporary access road within the landfill graded and crowned? | _____ | _____ |
| 5. | Are the drainage ditches along the roads free of debris and overgrown vegetation? | _____ | _____ |
| 6. | Is mud tracked onto public roads during or after rain storms? | _____ | _____ |
| 7. | If yes above, does the site operator clean the roads? | _____ | _____ |
| B. | <u>Personnel</u> | | |
| 1. | Number of Personnel: | | |
| | _____ Operators | | |
| | _____ Spotters | | |
| | _____ Mechanics | | |
| | _____ Other (Specify) _____ | | |
| 2. | Is there a full time gate attendant present? | _____ | _____ |
| 3. | Is safety equipment (e.g., protective clothing, respirators) provided and used? | _____ | _____ |
| 4. | Are training and safety meetings held on a regular basis? | _____ | _____ |
| 5. | Is salvaging or scavenging prohibited? | _____ | _____ |

C. Equipment

1. In use: _____

2. Under maintenance: _____

3. In reserve/backup: _____

D. Operations

| | Yes | No |
|--|-----|-----|
| 1. Is the unloading area clearly marked? | ___ | ___ |
| 2. Is a spotter used at the unloading area? | ___ | ___ |
| 3. How many vehicles per day use the site? _____ | | |
| 4. What is the width of the operating face? _____ | | |
| 5. Is it confined to the smallest practical width? | ___ | ___ |
| 6. Is there sufficient compaction? | ___ | ___ |
| 7. Is the face covered every day? | ___ | ___ |
| 8. Are the grades being set and checked daily? | ___ | ___ |
| 9. Has final cover been applied to within 100 feet of the working face (applies only to final lift)? | ___ | ___ |
| 10. Is there a completed area that has not had final cover applied and graded such that there is <u>no</u> ponding of water? | ___ | ___ |
| 11. Is the completed section at grade? | ___ | ___ |
| 12. Have the completed areas been seeded, season permitted? | ___ | ___ |
| 13. Is there blown litter around the site? | ___ | ___ |
| 14. Is there an odor problem? | ___ | ___ |

| | | Yes | No |
|-----------------------------------|---|-----|-----|
| 15. | Is cover application log up to date? | ___ | ___ |
| 16. | Are grid markers and buffer zone markers in place? | ___ | ___ |
| 17. | Are gas pipeline easement and electrical power line easement markers in place? | ___ | ___ |
| E. <u>Water Management</u> | | | |
| 1. | Has settlement on completed areas caused any ponding of water? | ___ | ___ |
| 2. | Does storm runoff drain onto the actual operating face? | ___ | ___ |
| 3. | Is there an erosion problem on any slope? | ___ | ___ |
| 4. | Is detention basin clean, silt removed, proper freeboard? | ___ | ___ |
| F. <u>Water Quality</u> | | | |
| 1. | Does the site have any leachate seeps? | ___ | ___ |
| 2. | If so, describe corrective action to be taken: | | |
| | _____ | | |
| | _____ | | |
| G. <u>Methane Gas</u> | | | |
| 1. | Evidence of gas migration? | ___ | ___ |
| 2. | Any historical problems? | ___ | ___ |
| | If so, short explanation: _____ | | |
| | _____ | | |
| 3. | Date of last gas migration survey: _____ | | |
| 4. | Do results of last migration survey indicate need for installation of barrier/vent systems? | ___ | ___ |
| H. <u>Fire Protection</u> | | | |
| 1. | Water available at working face? | ___ | ___ |

| | | Yes | No |
|----|---|-----|----|
| | 2. Stockpiled soil available? | — | — |
| | 3. Fire extinguisher on all equipment? | — | — |
| | 4. Communications available at working face? | — | — |
| I. | <u>Housekeeping</u> | | |
| | 1. Litter at entrance or along access road? | — | — |
| | 2. Litter scattered around site? | — | — |
| | 3. Litter cleanup program in effect? | — | — |
| | 4. Unnecessary junk present on site (e.g., containers, trucks, heavy equipment)? | — | — |
| J. | <u>Vector and Animal Controls</u> | | |
| | 1. Rodent problem apparent? | — | — |
| | 2. Rodent control measures being implemented? | — | — |
| | 3. Bird problem? | — | — |
| | 4. Is there a bird control program in effect? | — | — |
| | 5. Is an insect problem apparent? | — | — |
| K. | <u>Documents</u> | | |
| | 1. Is the permit or license prominently shown or available at the site? | — | — |
| | 2. Are the engineering plans on site? | — | — |
| | 3. Are the above plans being followed? | — | — |
| | 4. Are the TNRCC municipal solid waste management regulations on-site? | — | — |
| | 5. Are inspection records, training procedures, and notification procedures relating to excluding receipt of regulated hazardous waste and PCB waste on site? | — | — |

Yes

No

6. Are results of gas monitoring on site?

—

—

NOTES:
