ITASCA LANDFILL - PCB DISPOSAL PROPOSED APPROVAL AND SUPPORTING DOCUMENTS

TABLE OF CONTENTS

ITASCA LANDFILL TX, LP

HILL COUNTY LANDFILL
PCB APPROVAL CONDITIONS

Consistent with 40 CFR §761.75(c) the U.S. Environmental Protection Agency, Region 6 has determined that Itasca Landfill's application for approval to dispose PCBs in Landfill phases 4-17 meets the requirements of 40 CFR §761.75.

The terms and abbreviations in these conditions are in accordance with those defined in 40 CFR § 761.3, unless otherwise noted. The term "Facility" hereinafter refers to Itasca Landfill TX, LP, located in Hill County, TX.

I. LOCATION OF FACILITY

The Facility is located on Farm to Market Road 66, approximately two miles east of Interstate Highway 35W.

II. PCB WASTES AND DISPOSAL UNITS AUTHORIZED

A. PCB Waste Authorizations and Prohibitions

1. The following PCB wastes may be disposed at the Facility:

   a. non-liquid PCBs regulated for disposal in accordance with 40 CFR § 761.61;
   b. non-liquid PCBs regulated for disposal in accordance with 40 CFR § 761.62;
   c. non-liquid PCBs regulated for disposal in accordance with 40 CFR § 761.79;
   d. PCB Small Capacitors; and,
   e. PCB liquids at concentrations <500 parts per million (ppm) that come from incidental sources as defined at 40 CFR § 761.60(a)(3) solidified in accordance with condition III.A.3. before disposal in an authorized disposal cell.

2. The following PCB wastes are prohibited from disposal at the Facility (some of these prohibitions may be removed or modified, provided the Facility applies for and receives EPA approval for a commercial storage facility pursuant to 40 CFR § 761.65(d):

   a. PCB liquids other than those allowed in condition II.A.1.e.; and,

b. PCB Items (except PCB Small Capacitors) including PCB Transformers, PCB Large Capacitors (i.e., 50 ppm), PCB hydraulic machines, PCB- Contaminated Electrical Equipment, Natural gas pipeline systems containing PCBs, other PCB Articles that contain PCBs, PCB Containers or PCB Article Containers.

3. Notwithstanding condition II.A.2. above, the Facility may dispose of the following prohibited wastes, provided that the Facility complies with condition II.A.4. below:

   a. drained and flushed PCB Transformers pursuant to 40 CFR § 761.60(b)(1)(i)(B);

   b. drained and flushed PCB hydraulic machines pursuant to 40 CFR § 761.60(b)(3)(ii) and 40 CFR § 761.60(b)(l)(i)(B);

   c. drained and flushed PCB-Contaminated Electrical Equipment (except PCB Large Capacitors) pursuant to 40 CFR § 761.60(b)(4) and 40 CFR § 761.60(b)(l)(i)(B);

   d. drained and flushed natural gas pipeline systems pursuant to 40 CFR § 76 l.60(b)(5); and,

   e. other PCB articles that contain PCBs, PCB Containers or PCB Article Containers that are drained and flushed of all free-flowing liquids pursuant to 40 CFR § 761.60(b)(6) and 40 CFR § 761.60(b)(l)(i)(B).

4. For disposal of PCB Items listed in condition II.A.3. above, the Facility shall inspect each PCB Item at the site of generation or transport and verify that each PCB Item intended for shipment for disposal at the Facility is free from all free-flowing liquids. This information shall be recorded and kept on file at the Facility. The record shall contain the following information:

   a. the name, date, and place of inspection;

   b. the name of the Facility inspector;

   c. a description of each PCB Item inspected, including any serial numbers or markings that discretely identify the PCB Item; and,

   d. how the Facility inspector verified that there were no free-flowing liquids in each PCB Item to be disposed.

B. Units Authorized

The following waste treatment and disposal units are authorized for solidification and disposal of PCB wastes (no liquid PCBs may be disposed in the approved cells). The capacity of each unit is detailed in attachment A. Disposal of PCB waste shall not exceed 100,000 tons annually and solidification of PCB containing liquid waste in the liquid waste bulking facility shall not exceed 1,000,000 gallons annually without prior approval.

1. Landfill Phases 4, 5, 6, 15 B and 16B/17

2. Conditional approval of Phases 7 through 14, provided EPA grants written approval for the phases that have been completed in accordance with approved EPA and Texas Commission on Environmental Quality (TCEQ) plans, and which have received written operating approval from the TCEQ.

3. The liquid waste bulking facility.

C. Authorization to Operate Additional Units

For a new landfill cell that has not been constructed or put into use before the effective date of this approval, the Facility shall not commence disposal of PCB wastes until the Facility has notified in writing the EPA Region 6 PCB Coordinator and received a written approval authorizing the new cell for PCB disposal. The notification shall include a narrative and detailed as-built engineering drawings of the new cell showing that the new cell(s) meet TCEQ and Toxic Substances Control Act (TSCA) PCB design requirements. The notification shall also include drawings of the placement of groundwater monitoring wells and the depth these wells have been screened to detect contaminants in the upper aquifer zones. A certification by a registered Professional Engineer shall also be included that the new cell has been constructed in accordance with the design plans.

D. Facility Expansion

Any modification or expansion in capacity of an approved cell requires that the Facility notify EPA Region 6 in writing and receive written approval from EPA Region 6 before PCB wastes may be disposed in the cell after the cell has been modified or expanded.

E. Waste Characterization and Acceptance

Itasca shall require generators to submit a PCB non-hazardous waste profile along with waste shipments (Appendix A-3). Itasca shall require generators to analyze PCB non-hazardous waste semi-annually to recertify waste profiles (40 CFR 761.75(c)(3)(ii)).

III. DISPOSAL FACILITY DESIGN, CONSTRUCTION, AND OPERATION

A. General Design, Construction, and Operating Requirements

1. The design, construction, and operation of the PCB landfill and liquid waste bulking facility shall comply with applicable portions of 40 CFR Part 76I, Subpart D, 40 CFR §761.75(b)(l)-(9) (Technical requirements), and the Facility original application dated September 2013 and revisions through September 2024.

2. The design, construction, and operation of the PCB disposal areas shall also comply with the effective TCEQ permit.

3. No PCB liquids or items containing PCB liquids may be disposed in the PCB landfill cells. Incidental sources of PCB liquids received at the Facility shall be immediately solidified upon receipt before being disposed in the landfill cells. Solidification shall take place in the liquid waste bulking facility authorized in condition II.B.3. A representative sample from each batch of solidified waste for disposal shall be collected and pass the Paint Filter Test (EPA Method 9095, SW-846) before the batch may be disposed. A representative sample shall be defined as three aliquots, each taken from a portion of three equally divided areas of the total batch and then composited into one sample. Test results shall be kept on file at the Facility.

4. Water containing PCBs, may only be solidified and disposed in the landfill, if the PCB concentration meets the decontamination standard of less than or equal to 0.5 ppb as specified in 40 CFR § 761.79(b)(l)(iii).

5. Water containing PCBs with the PCB concentration greater than 0.5 parts per billions (ppb) shall be disposed of in an incinerator that complies with §761.70 or a high efficiency boiler in accordance with §761.71; or in a facility with an alternative disposal approval issued under §761.60(e), depending on the concentration of the liquid waste as outlined in 40 CFR §761.79.

6. The Facility may not dispose of PCB wastes in the landfill or any landfill cell if the TCEQ permit for the landfill or any landfill cell becomes invalid, unless EPA provides further written approval to do so.

7. All PCB wastes shall be logged showing date removed for disposal and the date the PCB or PCB Item was disposed in a landfill cell. The location of PCB wastes disposed within the landfill cells shall be recorded and kept on file. This information shall be provided to EPA upon request.
8. The Facility shall at all times during PCB disposal, properly operate and. maintain all facilities and systems of treatment and control (and related appurtenances), which are installed or used to achieve compliance with the conditions of this approval. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.

9. All transport vehicles owned by the Facility and used for the transport of PCB wastes on public highways shall be properly maintained and inspected, as required by the applicable Department of Transportation regulations. Transporters of PCB waste shall notify EPA of their PCB waste activities by filing EPA Form 7710-53, "Notification of PCB Activity," prior to engaging in PCB waste hauling activities.

B. <u>Surface and Ground Water Monitoring Requirements</u>

1. Samples collected for compliance with this approval shall be analyzed for the parameters listed in 40 CFR § 761.75(b)(6)(iii). The term "chlorinated organics" shall be defined as a full scan gas chromatograph analysis for volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) in groundwater samples, and SVOCs for surface water sample analysis.

2. All surface and groundwater samples shall be analyzed for PCBs. Analytical methods shall follow EPA approved procedures and methods. The procedures and methods used shall be recorded along with the data.

3. Monitoring wells MW-7R, MW-14, MW-17, MW-20R, MW-21, MW-22, MW-23, MW- 24, MW-25, and MW-26 shall be sampled and analyzed semi- annually for the constituents required in III.B.1 and 2. Any sample result with detectable levels of PCBs shall be reported via email to the EPA Region 6 PCB Coordinator within 5 working days of discovery.

4. Surface water offsite discharges shall be sampled and analyzed at least semi-annually for the constituents required in III.B.l .and B.2. where sufficient sample size may be collected for analysis. Any sample result with detectable levels of PCBs shall be reported via email to the EPA Region 6 PCB Coordinator within 5 working days of discovery.

C. Sediment monitoring

The facility shall conduct annual (at least six months apart) sediment monitoring for the drainage near the Storm water outfalls SWO-1 and SWO-2 location under provision 40 CFR 761.75 (c)(3)(ii). The PCB levels in any soil sample or solid sample required by this Approval shall be determined by using:

1. Appropriate procedures identified by SW-846 Method 3500C (or future EPA updates) for organic extraction and sample preparation.

2. Procedures identified by SW-846 Method 3600C (or future EPA updates) for sample extract cleanup, when necessary/appropriate.

3. SW-846 Methods 8082A (as updated by EPA) for analytical measurement. The results shall be reported as total PCBs, on a dry weight basis (103-105°C), calculate by comparison to Aroclor standards identified by SW-846 Methods 8082A when Aroclors are present. Identified Aroclors used for calculation of total PCBs also are to be reported. The report shall identify the location the sample was taken, and the PCB levels detected.
4. All sediment sampling results shall be reported to the EPA Region 6 PCB Coordinator, via email within 15 working days of discovery. At the end of 5 years, EPA will reevaluate the sampling results reporting requirements. The analytical laboratory methods used for PCB analysis shall meet the detection limit of 1 ppm for PCB.

D. Leachate Collection and Disposal

1. Leachate collected from the leachate collection system shall be stored in the approved storage tank listed under condition IV.A.

2. Leachate shall be managed in accordance with Section 6 of the September 2024 application. Any modification to this plan shall be submitted to EPA Region 6 for review and approval before a new or modified plan may be implemented by the Facility.

3. Leachate collection shall comply with requirements under 40 CFR §761.75(b)(7) and shall be sampled and analyzed as required under 40 CFR §76l.75(b)(6)(iii), in addition to those constituents required by the TCEQ. Analytical methods shall follow EPA approved methods and procedures. Results of these analyses and the method used shall be kept on file at the Facility and made available to EPA upon request. Any sample result with detectable levels of PCBs shall be reported via email to the EPA Region 6 PCB Coordinator within 5 working days of discovery.

4. Leachate shall be properly disposed at disposal facilities approved for such wastes in accordance with 40 CFR §761.75(b)(7). The Facility shall keep records of when and where leachate was disposed. Leachate may be disposed in Facility units authorized in condition II.B after solidification. A representative sample of each solidified batch must pass the Paint Filter Test before disposal.
5. Leachate from TSCA-PCB approved cells shall be sampled prior to mixing with leachate/water from other sources. Dilution to avoid applicability of the TSCA-PCB regulations is prohibited as specified in 40 CFR §761.1.
6. The Facility shall ensure that leachate depth over the primary liner in PCB landfill cells do not exceed one (1) foot.

E. Run-On Runoff Systems

Itasca landfill shall comply with the requirements in §761.75(b)(4) (ii), Appendix C, Part III - Site development plan and Part IV- Site operating plan of the permit application including:

1. operating and maintaining a run-on control system capable of preventing storm water flow onto the active portions of the Itasca Landfill during peak discharge from a 24-hour, 25-year storm; and
2. operating and maintaining a runoff management system to collect and control storm water volume resulting from a 24-hour, 25-year storm event, as provided in site operating plan for the Itasca Landfill.

IV. AUTHORIZATIONS FOR LEACHATE COLLECTION TANKS

A. Units Authorized

1. The 200,000 gallons leachate storage tank.

B. Authorization to Operate Additional Leachate Storage Tanks

For an additional PCB leachate storage tank, the Facility shall not commence storage of the leachate in the new tank until the Facility has notified the EPA Region 6 PCB Coordinator in writing and received a written approval authorizing the new leachate storage tank. The notification shall include a detailed engineering description of the leachate storage tank.

V. LANDFILL CLOSURE AND POST-CLOSURE CARE

A. Facility landfill closure and post-closure care shall comply with the plans presented in Appendix B of the September 2024 application. Any proposed changes to these plans shall be submitted to the EPA Region 6 PCB Coordinator for review and written approval. EPA Region 6 reserves the right to require written modifications to these plans to ensure compliance with the TSCA PCB regulations.

B. The Facility shall notify the EPA Region 6 PCB Coordinator in writing that a PCB containing landfill cell is scheduled for closure within 60 days of the anticipated date when closure is to begin, along with a copy of the closure plan.

C. Records required under 40 CFR § 761.180(d) and (f) shall be maintained by the Facility for the times specified after closure of the PCB approved landfill.

D. The Facility shall submit a closure decontamination plan to the EPA Region 6 PCB Coordinator for written approval for the PCB leachate collection tank and the liquid waste bulking facility within 180 days of the planned closure date.

E. Upon completion of closure activities, a copy of the certification of final closure required by the TCEQ shall be provided to EPA Region 6.

F. Copies of the annually adjusted closure cost estimate and proof of adequate financial assurance as required by the TCEQ and 40 C.F.R. § 761.75(c) (3) (ii) for the Facility landfill shall be provided to the EPA Region 6 PCB Coordinator.

VI. STANDARD APPROVAL CONDITIONS

A. Severability

The conditions of this authorization are severable, and if any provision of this authorization, or any application of any provision, is held invalid, the remainder of this authorization shall not be affected thereby.

B. Duty to Comply

The Facility shall comply with all Federal, State, and local regulations, approvals, and permits. The Facility may not dispose of PCBs, if any existing permits prohibit such disposal until the prohibition has been removed from the permit.

C. Personnel Safety

The Facility personnel safety requirements and procedures for PCB handling, storage, transport, and disposal shall comply with Occupational Safety and Health Administration (OSHA) requirements.

D. Duty to mitigate and Protect the Environment

1. The Facility shall correct any adverse impact on the environment resulting from noncompliance with this approval.

2. Condition to modify, revoke and reissue, or terminate the Approval. EPA reserves the right to modify (including by imposing additional conditions), revoke and reissue, or terminate this Approval when any of the following circumstances exist:

    a. EPA has reason to believe the approved activities are not achieving the relevant standards or goals or otherwise are not in compliance with the Approval.

    b. EPA has reason to believe the approved activities present or may present an unreasonable risk of injury to health or the environment;

    c. EPA becomes aware of new or previously undisclosed information that may substantively impact its previous finding of no unreasonable risk and require modifications to this Approval; or

    d. EPA issues new regulations or standards that impact conditions of this Approval.

3. Condition to require additional information. When any of the circumstances described above exist, EPA reserves the right to require the facility to provide additional information relevant to the Agency's determination whether to modify, revoke and reissue, or terminate the Approval. This may include information to inform EPA's finding that the approved activity does not present an unreasonable risk of injury to health or the environment, such as information related to the risks or impacts of the activity on surrounding communities and communities with environmental justice concerns, including those related to climate change and cumulative impacts of environmental and other burdens.

4. Condition to provide additional information. If the facility becomes aware of new or previously undisclosed information that may substantively impact EPA's previous

finding that approved activities do not present an unreasonable risk of injury to health or the environment, the facility must provide that information to the Agency as soon as possible but no later than 30-days. This may include information related to the risks or impacts of the approved activity on surrounding communities and communities with environmental justice concerns, including those related to climate change and cumulative impacts of environmental and other burdens.

E. Proper Operation and Maintenance

The Facility shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed and used to achieve compliance with the conditions of this approval. Proper operation and maintenance include effective performance, adequate funding, adequate operator staffing and training; and adequate laboratory and process controls, including appropriate quality assurance procedures.

F. Duty to Provide Information

The Facility shall provide any relevant information which EPA may request to determine whether cause exists for modifying, revoking, reissuing, or terminating this approval, or to determine compliance with this approval. The Facility shall also provide, upon request, copies of records required to be kept under the TSCA PCB regulations.

G. Inspection and Entry

The Facility shall allow an authorized representative, upon presentation of credentials and other documents as may be required by law, to:

a. enter the Facility where PCBs are being handled, stored, or disposed;

b. have access to and copy, at reasonable times, any records that are required to be kept-under the TSCA PCB regulations;

c. inspect any facilities, equipment (including monitoring equipment), practices, or operations required under this approval or the TSCA PCB regulations; or,

d. sample or monitor for the purpose of assuring that the Facility is operating in compliance with the conditions of this approval or the TSCA PCB regulations.

H. Monitoring and Records

1. The Facility shall comply with all monitoring and record keeping requirements for PCB landfills and storage facilities. All PCB records, documents, and reports shall be maintained at centralized locations at the Facility and shall be made available for inspection by authorized EPA representatives. All records required by this approval shall be written in ink, typed, or put in electronic format. Any modification or correction of the records shall be initialed and dated by the supervisor in charge.

2. The owner/operator shall maintain records of PCB waste in accordance with 40 CFR § 761.180(b), including three-dimensional burial coordinates for PCB waste required by 40 CFR 761.75(b)(8)(iv) and an annual document which contains information on the type and quantity of PCBs and PCB items handled at the facility.

I. Notice of Transfer of Ownership

The Facility shall notify EPA at least thirty (30) days before transferring ownership of the Facility. The Facility shall also submit to EPA, at least thirty (30) days before such transfer, a notarized affidavit signed by the transferee stating that the transferee shall abide by the terms of this approval.

J. Twenty-four Hour Reporting of Noncompliance

If at any time the Facility becomes aware of any departure from the TSCA PCB regulations, the approval, or the conditions of approval, it shall notify the EPA Region 6 PCB Coordinator by telephone within 24 hours and shall submit a written report within five (5) working days.

K. Other Information

When Facility officials become aware that it failed to submit any relevant facts in its application, or submitted incorrect information in any report to EPA, it shall promptly submit such facts or information to the EPA Region 6 PCB Coordinator.

L. Operation of the Facility

The Facility shall maintain an adequately trained onsite inspector to direct emergency procedures, which could result from fires, explosions or releases of PCB

containing wastes at the Facility. The Facility shall submit the name of this inspector within sixty (60) days of the effective date of this approval. The Facility shall maintain in good working order any equipment required to deal with these emergencies.

M. Spills

PCB spills occurring at the Facility, or from any Facility owned PCB transport vehicle, shall be cleaned up according to the PCB Spill Cleanup Policy, 40 CFR Part 761, Subpart G. Following each spill cleanup action, the Facility shall develop and maintain records of the cleanup in accordance with 40 CFR § 761.120-135, the PCB Spill Cleanup Policy. These records shall include:

a. identification of the source of the spill;

b. estimated or actual date and time of the spill occurrence;

c. date and time cleanup was completed;

d. description of the spill location;

e. pre-cleanup sampling data used to establish spill boundaries, if required, because of insufficient visible traces, and a description of the sampling methodology used;

f. amount and type of waste cleanup material generated;

g. description of the solid surfaces cleaned and of the double wash/rinse method used, and if soil is the contaminated media, the depth of soil excavated and amount of soil removed for disposal;

h. post-cleanup verification sampling information such as a description of the sampling methodology used, the number of samples analyzed, and the analytical data; and,

i. a certification by the appropriate Facility officials stating that the cleanup levels required by EPA were achieved, and that the record is true to the best of his/her knowledge.

N. Duty to Notify

The Facility shall notify the EPA Region 6 PCB Coordinator in writing at least thirty (30) days prior to any planned physical or operational change that may require modification of this approval.

O. Effective Date of Approval

This approval becomes effective on the date of the approval letter, and expires at midnight, the same day and month, five years later. Please re-apply for re-authorization six months before the expiration date. If your application for re-authorization is received before the expiration date of this approval and a final determination has not been made by the expiration date, this approval shall be administratively continued until a final decision is made on your re-authorization request.

END OF APPROVAL CONDITIONS

APPENDIX A - AUTHIRIZED UNITS AND CAPACITY

Authorized units	Dimension	Maximum Capacity
Landfill - Phase 4	410' x 1590' x 34'	167,000 Cubic Yards
Landfill Phase 5A	400' x 600' x 48'	925,000 Cubic Yards
Landfill Phase 5B	400' x 950' x 48'	3,752,000 Cubic Yards
Landfill Phase 6A	400' x 870' x 48'	1,757,000 Cubic Yards
Landfill Phase 6B	400' x 710' x 54'	3,031,000 Cubic Yards
Landfill Phase 16B/17	965' x 1275' x 54'	2,185,000 Cubic Yards
Landfill Phase 15B	400’x1130’ x 62’	2,672,000 Cubic Yards
Leachate Storage Tank	⌀ 43.27' x 20’ Ht.	200,000 Gallons
Liquid Solidification area /Concrete Mixing Basins	4 Basins @ 60’x20’x12’	359,000 Gallons total

Note:

1. The capacities listed for each disposal area represent the maximum capacity (inclusive of PCB and non-PCB wastes). PCB waste is not to exceed 100,000 tons annually without approval.

2. Liquid Waste Bulking Facility: 359,000 gallons maximum capacity of PCB containing liquid/waste (<500 ppm). Not to exceed 1,000,000 gallons annually without approval.

8 PERSONNEL AND ENVIRONMENTAL PROTECTION

Personnel safety and environmental protection in the handling and disposal of TSCA PCB wastes is addressed through a variety of measures. The Itasca Landfill strives to comply with all applicable Occupational Safety and Health Administration (OSHA) regulations for personnel safety. The following activities and procedures are in place at the facility to minimize environmental impacts from TSCA PCB wastes disposed of at the landfill:

- storm water monitoring
- groundwater monitoring
- spill prevention planning
- spill response procedures

8.1 PCB Safety Training

Employees involved in the management of TSCA PCB wastes will receive training and instruction on the proper techniques for safety and protection around PCBs. Personal protective gear, such as dust masks and gloves, will be worn by personnel involved with placement, inspection, and disposal activities for TSCA PCB waste. Waste management safety training is updated at least every two years.

The landfill general manager, site manager, load inspectors, equipment operators, and gate attendants will be trained in the contents of the site operation plan by Itasca Landfill personnel. In-house training addresses the following topics:

- Customer notification and load inspection procedures;
- Identification of TSCA PCB wastes;
- Waste handling procedures (acceptable and prohibited wastes);
- Health and safety;
- Fire safety; and
- Recordkeeping.

Documentation of training is maintained electronically or physically at the site. Selected equipment operators, load inspectors, and other personnel will receive training at TCEQ-

sponsored or approved training courses as deemed appropriate by the landfill general manager.

8.2 Spill Control Methods

Vehicles transporting TSCA PCB wastes to the Itasca Landfill must be covered or have waste fully enclosed to prevent exposure to wind or rain. The gate attendant ensures that vehicles hauling waste to the site are enclosed or provided with a tarpaulin, net, or other means to properly secure the load. Waste vehicles are directed to the designated disposal areas immediately after entering the landfill.

The facility general manager is responsible for the cleanup of any waste materials spilled along and within the right-of-way of all public access roads serving the site for a distance of two miles in either direction from the facility's entrance. Cleanup for the spilled materials is performed on a weekly basis and more often if the landfill general manager deems necessary. The landfill general manager or his designee will consult with TxDOT officials as necessary concerning cleanup of state highways and rights-of-way consistent with Title 30 TAC §330.145.

In the event of an accident or spill that involves PCB-contaminated waste at the facility, but outside the approved disposal area, facility personnel will recover the material using onsite equipment such as front end loaders and trucks in order to return the material onto the disposal vehicle if practical. If any spills involving TSCA PCB wastes bound for the Itasca Landfill occur within 2 miles of the landfill, EPA Region VI, TCEQ Region 9, and the Executive Director of the TCEQ will be notified, and cleanup assistance will be provided as needed by the facility. If any waste materials come into contact with surface water, the water will be tested for PCB concentration and will be managed as contaminated water. If the spill requires additional assistance, facility personnel will contact a licensed spill cleanup contractor to perform the cleanup operation.

9 RECORDKEEPING AND DOCUMENTATION

9.1 PCB Waste Inspections and Records

All TSCA PCB wastes received at the Itasca Landfill will be accompanied by a pre-approved waste profile form and waste profile documentation characterizing the waste and describing the concentrations of PCBs contained within the waste. Analytical data providing PCB concentrations will be included with this documentation. If approval has been given from an applicable regulatory agency for sampling and analysis procedures that differ from widely used practices and procedures, documentation of this approval will be provided to the Itasca Landfill. Records and documents will be maintained at the Itasca Landfill Site Operating Record in either a physical or electronic format for a minimum of 20 years after the landfill has accepted its last load of TSCA PCB waste.

9.1.1 PCB Liquid Inspections

Inspections of TSCA PCB items for free-flowing liquids will be documented. These inspection forms are recorded, kept on file at the facility, and contain the following:

- Name, date, and place of inspection;
- Name of the facility inspector;
- Description of each TSCA PCB item inspected including serial numbers or markings that discretely identify the TSCA PCB item; and
- How the facility inspector verified that no free-flowing liquids were present in each TSCA PCB Item to be disposed.

9.1.2 PCB Storage and Disposal Logs

TSCA PCB wastes will be logged showing the date of removal for disposal and the date the PCB or PCB item was disposed of in a landfill cell. The location of the TSCA PCB wastes disposed of within the landfill cells will be recorded in three-dimensional coordinates and kept in the Site Operating Record.

9.2 PCB Spill Cleanup Records

Following each spill cleanup action, the Itasca Landfill will develop and maintain records of the cleanup. The records will include the following:

- Identification of the source of the spill;
- Estimated or actual date and time of the spill occurrence;
- Date and time cleanup was completed;
- Description of the spill location;
- Pre-cleanup sampling data used to establish spill boundaries if required due to insufficient visible traces, and a description of the sampling methodology used;
- Amount and type of waste cleanup material generated;
- Description of the solid surfaces cleaned and of the double wash/rinse method used, and if soil is the contaminated media, the depth of soil excavated and amount of soil removed for disposal;
- Post-cleanup verification sampling information such as a description of the sampling methodology used, the number of samples analyzed, and the analytical data; and
- A certification by the appropriate facility officials stating that the cleanup levels required by EPA were achieved, and that the record is true to the best of his/her knowledge.

9.3 Surface and Ground Water Monitoring Results

Procedures and methods used for surface water and groundwater monitoring will be recorded along with the data. Monitoring records will be maintained and kept in the site operating record.

Leachate sampling will be performed by a third party contractor and analyzed by an independent contractor. The results of these analyses and the method used will be kept on file in the Site Operating Record. Records will also be kept regarding when and where the leachate was discharged off-site.

All batches of TSCA PCB solidified waste will pass the Paint Filter Test (EPA Method 9095, SW-846) before they may be disposed.

REPUBLIC SERVICES, INC.

Republic Waste Services of Texas, LTD
Non-Hazardous Waste Profile
(MUST BE FILLED OUT COMPLETELY)

REPUBLIC SERVICES, INC.

A. GENERATOR INFORMATION

1. Generator Name:_____
2. Site Location:_____
3. City:_____
   State:_____ Zip:_____
4. Phone: ( )_____
5. Fax: ( )_____
6. State Facility I.D. #:_____
7. State Waste Code:_____

B. CUSTOMER INFORMATION

1. Customer Name:_____
2. Address:_____
3. City:_____
   State:_____ Zip:_____
4. Phone: ( )_____
5. Fax: ( )_____
6. Contact:_____
7. Title:_____

C. WASTE STREAM INFORMATION

1. Common Name of Waste:_____
2. Detailed Description of Process Generating Waste and Material Description:_____
   _____
   _____
3. Industrial Generator [ ]Yes [ ]No 4. Municipal Generator [ ]Yes [ ]No
5. Does the waste contain polychlorinated biphenyls (PCBs) regulated under EPA rules at TSCA 40 CFR Part 761? [ ] Yes [ ] No
6. Form Codes: Which of the following best describes the PCB Containing Waste: 394 395 396 397 398 399
   (See Form Code descriptions on the back of this form) 494 495 496 497 498 499
   598 599 698 699
7. Odor: [ ] None [ ] Mild [ ] Strong (describe)_____
8. Color _____ 9. Flash Point _____ 10. Viscosity_____
11. Reactive [ ]Yes [ ]No With: _____ 12. pH Range: _____
13. Free Liquid: [ ]Yes [ ]No 14. Water Content: _____% by Water
15. Were analytical tests to determine PCB concentrations performed using: [ ] EPA 8082 [ ] EPA_____
16. Does the waste contain radioactive or U.S. D.O.T. hazardous material materials? [ ] Yes [ ] No

D. SUPPLEMENTAL INFORMATION

[ ]None [ ]MSDS [ ]Analytical Data [ ]Memo/Letter [ ]Process Knowledge No. of Pages_____

E. SHIPPING INFORMATION

1. Estimated Volume: _____ [ ]Gallons [ ]Yards [ ]Other _____

F. GENERATOR / CUSTOMER CERTIFICATION

I hereby certify that all information submitted and all attached documents contain true and accurate descriptions of this waste. No deliberate or willful omissions of composition or properties exist, and all known or suspected hazards have been disclosed. I further certify that the waste is not designated a Hazardous Waste defined by the USEPA in 40 CFR 261.

I, _____, am employed by _____, and am authorized to sign this request for:
(Name, Please Print) (Company Name)

_____, _____, _____
(Company Name) (Signature) (Date)

G. LANDFILL USE ONLY (DO NOT WRITE WITHIN THIS SPACE)

Compliance Officer_____
Date_____ ☐ Approved ☐ Rejected
Additional Information _____
_____
_____
_____

State Fee Applicable Class I [ ]Yes [ ]No
State Fee Applicable MSW [ ]Yes [ ]No
Waste Disposal Agreement On File [ ]Yes [ ]No
Surety Agreement on File [ ]Yes [ ]No [ ]N/A

JOB #_____

Form Code Descriptions:

394 Nonhazardous solids containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

395 Nonhazardous solids containing greater than or equal to 500 ppm PCBs

396 Nonhazardous electrical equipment/devices containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

397 Nonhazardous electrical equipment/devices containing greater than or equal to 500 ppm PCBs

398 Nonhazardous soils containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

399 Nonhazardous soils containing greater than or equal to 500 ppm PCBs

494 Solids containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

495 Solids containing greater than or equal to 500 ppm PCBs

496 Electrical equipment/devices containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

497 Electrical equipment/devices containing greater than or equal to 500 ppm PCBs

498 Soils containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

499 Soils containing greater than or equal to 500 ppm PCBs

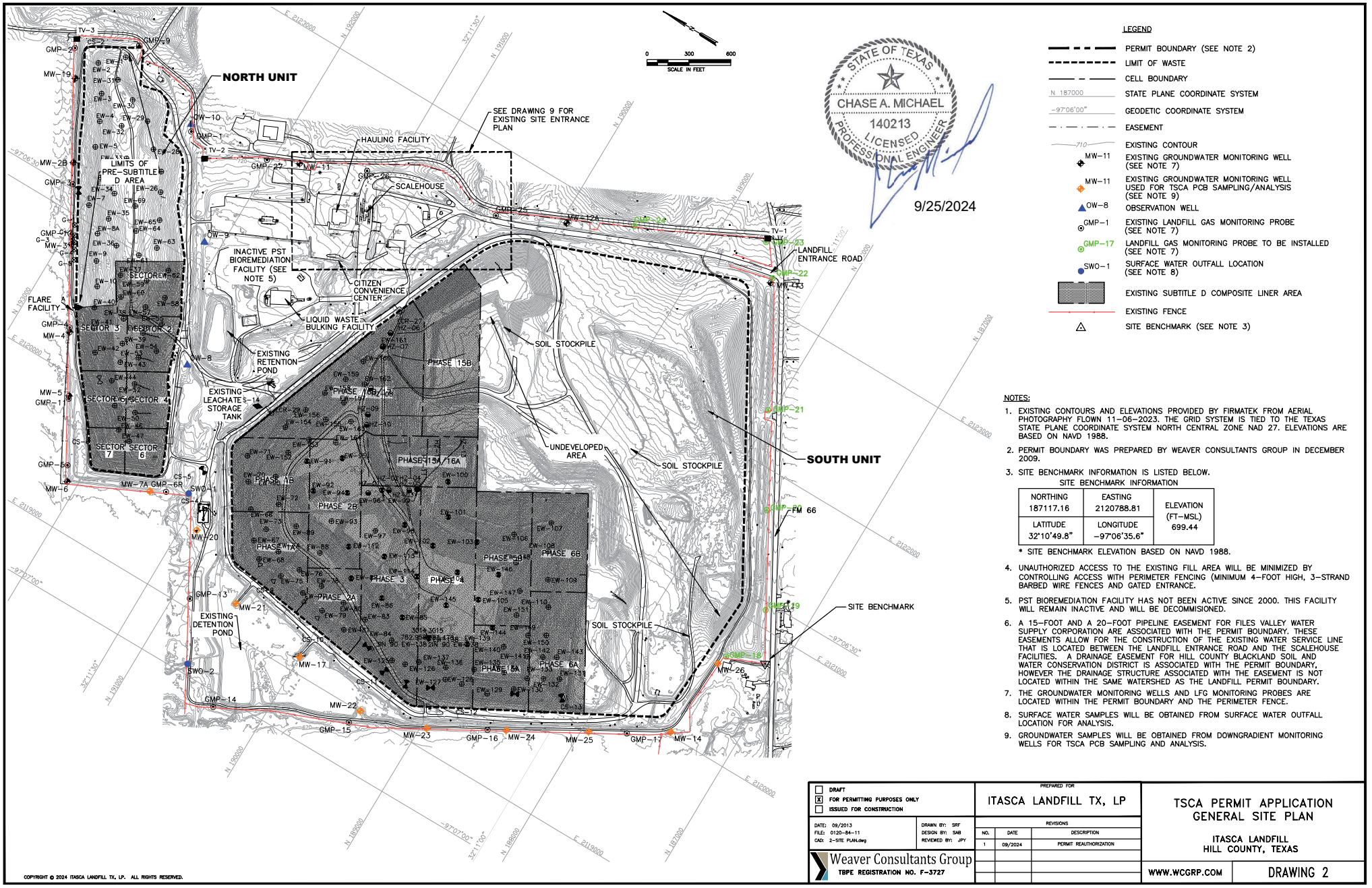
598 Nonhazardous inorganic sludges containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

599 Nonhazardous inorganic sludges containing greater than or equal to 500 ppm PCBs

698 Nonhazardous organic sludges containing greater than or equal to 50 ppm and less than (<) 500 ppm PCBs

699 Nonhazardous organic sludges containing greater than or equal to 500 ppm PCBs

APPENDIX D- SITE PLAN



STATE OF TEXAS
CHASE A. MICHAEL
140213
LICENSED
PROFESSIONAL ENGINEER

9/25/2024

LEGEND

- PERMIT BOUNDARY (SEE NOTE 2)
- LIMIT OF WASTE
- CELL BOUNDARY
- N 187000 — STATE PLANE COORDINATE SYSTEM
- -97°06'00" — GEODETIC COORDINATE SYSTEM
- EASEMENT
- 710 — EXISTING CONTOUR
- MW-11 — EXISTING GROUNDWATER MONITORING WELL (SEE NOTE 7)
- MW-11 — EXISTING GROUNDWATER MONITORING WELL USED FOR TSCA PCB SAMPLING/ANALYSIS (SEE NOTE 9)
- OW-8 — OBSERVATION WELL
- GMP-1 — EXISTING LANDFILL GAS MONITORING PROBE (SEE NOTE 7)
- GMP-17 — LANDFILL GAS MONITORING PROBE TO BE INSTALLED (SEE NOTE 7)
- SWO-1 — SURFACE WATER OUTFALL LOCATION (SEE NOTE 8)
- EXISTING SUBTITLE D COMPOSITE LINER AREA
- EXISTING FENCE
- SITE BENCHMARK (SEE NOTE 3)

NOTES:

1. EXISTING CONTOURS AND ELEVATIONS PROVIDED BY FIRMATEK FROM AERIAL PHOTOGRAPHY FLOWN 11-06-2023. THE GRID SYSTEM IS TIED TO THE TEXAS STATE PLANE COORDINATE SYSTEM NORTH CENTRAL ZONE NAD 27. ELEVATIONS ARE BASED ON NAVD 1988.
2. PERMIT BOUNDARY WAS PREPARED BY WEAVER CONSULTANTS GROUP IN DECEMBER 2009.
3. SITE BENCHMARK INFORMATION IS LISTED BELOW.

SITE BENCHMARK INFORMATION

NORTHING	EASTING	ELEVATION (FT-MSL)
187117.16	2120788.81	699.44
LATITUDE	LONGITUDE	
32°10'49.8"	-97°06'35.6"	

* SITE BENCHMARK ELEVATION BASED ON NAVD 1988.

4. UNAUTHORIZED ACCESS TO THE EXISTING FILL AREA WILL BE MINIMIZED BY CONTROLLING ACCESS WITH PERIMETER FENCING (MINIMUM 4-FOOT HIGH, 3-STRAND BARBED WIRE FENCES AND GATED ENTRANCE.
5. PST BIOREMEDIATION FACILITY HAS NOT BEEN ACTIVE SINCE 2000. THIS FACILITY WILL REMAIN INACTIVE AND WILL BE DECOMMISIONED.
6. A 15-FOOT AND A 20-FOOT PIPELINE EASEMENT FOR FILES VALLEY WATER SUPPLY CORPORATION ARE ASSOCIATED WITH THE PERMIT BOUNDARY. THESE EASEMENTS ALLOW FOR THE CONSTRUCTION OF THE EXISTING WATER SERVICE LINE THAT IS LOCATED BETWEEN THE LANDFILL ENTRANCE ROAD AND THE SCALEHOUSE FACILITIES. A DRAINAGE EASEMENT FOR HILL COUNTY BLACKLAND SOIL AND WATER CONSERVATION DISTRICT IS ASSOCIATED WITH THE PERMIT BOUNDARY, HOWEVER THE DRAINAGE STRUCTURE ASSOCIATED WITH THE EASEMENT IS NOT LOCATED WITHIN THE SAME WATERSHED AS THE LANDFILL PERMIT BOUNDARY.
7. THE GROUNDWATER MONITORING WELLS AND LFG MONITORING PROBES ARE LOCATED WITHIN THE PERMIT BOUNDARY AND THE PERIMETER FENCE.
8. SURFACE WATER SAMPLES WILL BE OBTAINED FROM SURFACE WATER OUTFALL LOCATION FOR ANALYSIS.
9. GROUNDWATER SAMPLES WILL BE OBTAINED FROM DOWNGRADIENT MONITORING WELLS FOR TSCA PCB SAMPLING AND ANALYSIS.

☐ DRAFT
☒ FOR PERMITTING PURPOSES ONLY
☐ ISSUED FOR CONSTRUCTION

DATE: 09/2013
FILE: 0120-84-11
CAD: 2-SITE PLAN.dwg

DRAWN BY: SRF
DESIGN BY: SAB
REVIEWED BY: JPY

Weaver Consultants Group
TBPE REGISTRATION NO. F-3727

PREPARED FOR
ITASCA LANDFILL TX, LP

REVISIONS		
NO.	DATE	DESCRIPTION
1	09/2024	PERMIT REAUTHORIZATION

TSCA PERMIT APPLICATION
GENERAL SITE PLAN

ITASCA LANDFILL
HILL COUNTY, TEXAS

WWW.WCGRP.COM

DRAWING 2

22

LEGEND

- PERMIT BOUNDARY (SEE NOTE 2)
- LIMIT OF WASTE
- CELL BOUNDARY
- STATE PLANE COORDINATE SYSTEM
- GEODETIC COORDINATE SYSTEM
- EASEMENT
- EXISTING CONTOUR
- MW-11 EXISTING GROUNDWATER MONITORING WELL
- OW-8 OBSERVATION WELL
- GMP-1 EXISTING LANDFILL GAS MONITORING PROBE
- GMP-22 LANDFILL GAS MONITORING PROBE TO BE INSTALLED
- EXISTING SUBTITLE D COMPOSITE LINER AREA
- EXISTING FENCE
- FILL DIRECTION (SEE NOTE 3)
- 100-YEAR FLOODPLAIN
- PERIMETER ACCESS ROAD
- 3H:1V SLOPE (TYPICAL)

SECTOR/PHASE SUMMARY	
SECTOR/PHASE*	AREA (ACRES)
NORTH UNIT	
PRE-SUBTITLE D AREA	24.80
SECTOR 1	4.27
SECTOR 2	3.17
SECTOR 3	3.59
SECTOR 4	2.84
SECTOR 5	2.77
SECTOR 6	2.16
SECTOR 7	1.80
SOUTH UNIT	
PHASE 1A	6.91
PHASE 1B	6.71
PHASE 2A	4.69
PHASE 2B	7.84
PHASE 3	14.05
PHASE 4	14.48
PHASE 5A	5.57
PHASE 5B	8.80
PHASE 6A	8.20
PHASE 6B	6.51
PHASE 6C	0.60
PHASE 15A/16A	7.32
PHASE 15B	10.67
PHASE 16B/17	15.59
PHASE 14	15.49
PHASE 7	15.30
PHASE 13	15.24
PHASE 8	14.69
PHASE 12	14.77
PHASE 9	7.33
PHASE 11	14.25
PHASE 10	10.84

* THE TERM SECTOR AND PHASE ARE USED TO DESIGNATE THE INDIVIDUAL LANDFILL AREAS WITHIN THE NORTH AND SOUTH UNITS. THE TERM SECTOR APPLIES TO THE NORTH UNIT AND THE TERM PHASE APPLIES TO THE SOUTH UNIT.

NOTES:

1. EXISTING CONTOURS AND ELEVATIONS PROVIDED BY FIRMATEK FROM AERIAL PHOTOGRAPHY FLOWN 11-06-2023. THE GRID SYSTEM IS TIED TO THE TEXAS STATE PLANE COORDINATE SYSTEM NORTH CENTRAL ZONE NAD 27. ELEVATIONS ARE BASED ON NAVD 1988.
2. PERMIT BOUNDARY WAS PREPARED BY WEAVER CONSULTANTS GROUP IN DECEMBER 2009.
3. SECTOR DESIGNATIONS INDICATE GENERAL PROGRESSION OF LANDFILL OPERATIONS. FILL DIRECTION ARROWS INDICATE GENERAL DIRECTION OF FILL WITHIN A SECTOR.
4. EACH SECTOR WILL ACCEPT MUNICIPAL SOLID WASTE RESULTING FROM, OR INCIDENTAL TO, MUNICIPAL, COMMUNITY, COMMERCIAL, INSTITUTIONAL, RECREATIONAL AND INDUSTRIAL ACTIVITIES, INCLUDING GARBAGE, PUTRESCIBLE WASTES, RUBBISH, ASHES, BRUSH, STREET CLEANINGS, DEAD ANIMALS, ABANDONED AUTOMOBILES, CONSTRUCTION-DEMOLITION WASTE, YARD WASTE, CLASS I NON HAZARDOUS INDUSTRIAL WASTE CLASSIFIED AS SUCH DUE TO ASBESTOS CONTENT, CLASS 2 NON-HAZARDOUS INDUSTRIAL SOLID WASTE, CLASS 3 NON-HAZARDOUS INDUSTRIAL SOLID WASTE, AND CERTAIN SPECIAL WASTES. REFER TO DRAWING 4 FOR PHASES ACCEPTING TSCA PCB WASTE.
5. AS OF THE DATE OF THE TOPOGRAPHIC MAP, ALL OF THE NORTH UNIT HAS BEEN DEVELOPED. PHASE 1A THROUGH 5B AND 15A/16A THROUGH 17 IN THE SOUTH UNIT HAS BEEN DEVELOPED. THE CLASS I WORKING FACE IS CURRENTLY IN PHASE 5A. THE SEQUENCE OF DEVELOPMENT WILL OCCUR ACCORDING TO THE SEQUENCE LISTED IN THE TABLE. EACH PHASE REPRESENTS AN INDIVIDUAL AREA DRAINING TO A SINGLE LCS SUMP.

STATE OF TEXAS
CHASE A. MICHAEL
140213
LICENSED
PROFESSIONAL ENGINEER

9/25/2024

- [ ] DRAFT
- [x] FOR PERMITTING PURPOSES ONLY
- [ ] ISSUED FOR CONSTRUCTION

DATE: 09/2013
FILE: 0120-84-11
CAD: 3-SECTOR DEVELOPMENT SEQUENCE.dwg
DRAWN BY: SRF
DESIGN BY: SAB
REVIEWED BY: JPY

Weaver Consultants Group
TBPE REGISTRATION NO. F-3727

PREPARED FOR
ITASCA LANDFILL TX, LP

REVISIONS		
NO.	DATE	DESCRIPTION
1	09/2024	PERMIT REAUTHORIZATION

TSCA PERMIT APPLICATION
SECTOR DEVELOPMENT SEQUENCE

ITASCA LANDFILL
HILL COUNTY, TEXAS

WWW.WCGRP.COM

DRAWING 3

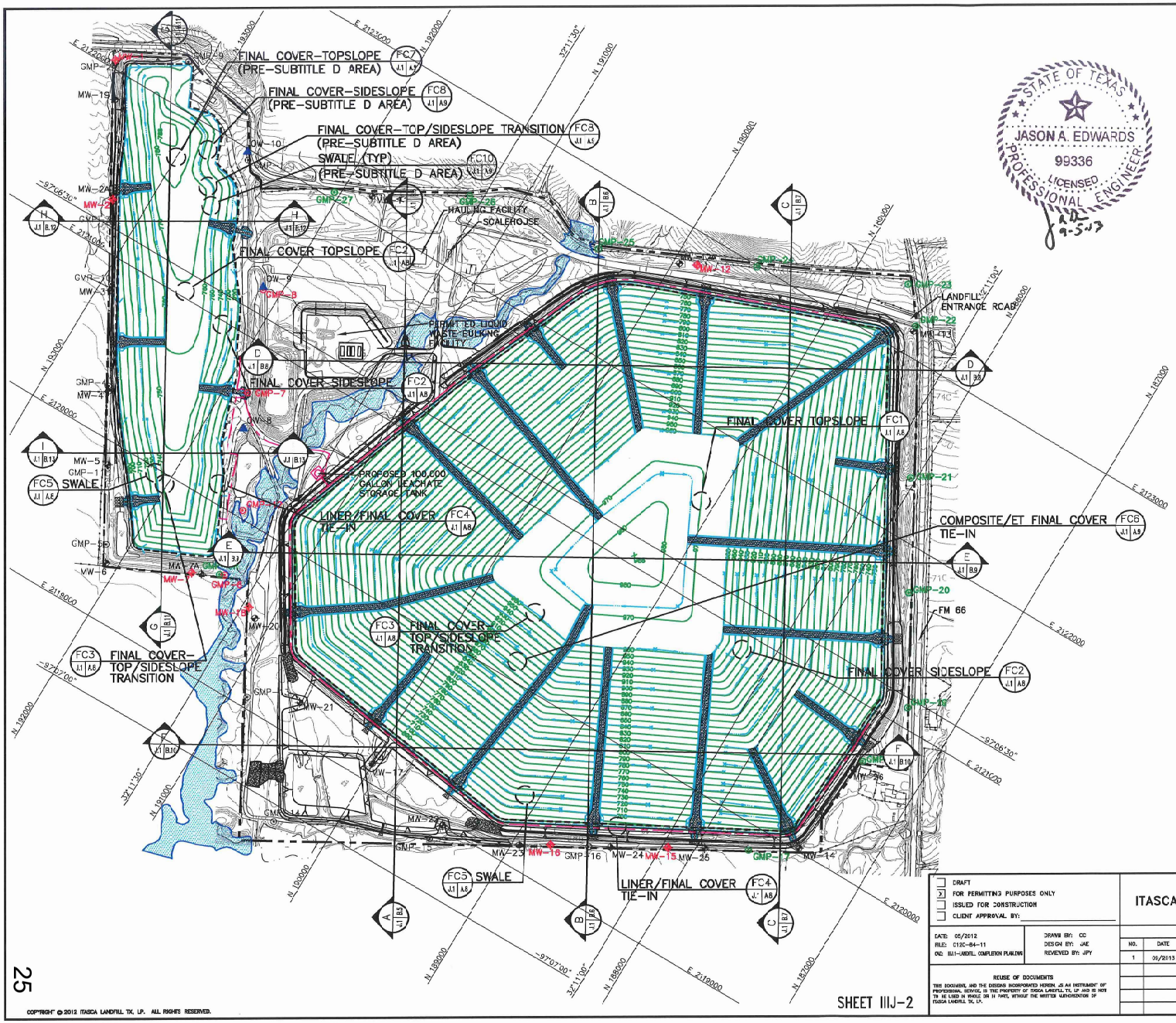
23

APPENDIX E- CLOSURE PLAN

1 INTRODUCTION

This appendix addresses §330.63(h) and §330.451 through §330.461.

This Final Closure Plan has been prepared for the Itasca Landfill consistent with Title 30 Texas Administrative Code (TAC) Chapter 330, Subchapter K, §330.451 through §330.461, as well as §330.63(h). The landfill completion plan for this site consists of final contours and drainage features for the completed landfill. The landfill completion plan is shown on Figure IIIJ.1. In addition, Figure IIIJ.2 – Final Cover Options shows the type of final cover system that is applicable for each area. This appendix also addresses closure procedures for the Liquid Waste Bulking Facility, Citizens Convenience Center, and other structures located onsite.



0 300 600
SCALE IN FEET

LEGEND

- PERMIT BOUNDARY (SEE NOTE 2)
- LIMIT OF WASTE
- N 187000 STATE PLANE COORDINATE SYSTEM
- -97°06'30" GEODETIC COORDINATE SYSTEM
- EXISTING CONTOUR
- 810 FINAL CONTOUR
- DRAINAGE LETDOWN STRUCTURE
- DRAINAGE SWALE
- MW-11 EXISTING GROUNDWATER MONITORING WELL
- MW-1 EXISTING GROUNDWATER MONITORING WELL TO BE DECOMMISSIONED
- OW-8 OBSERVATION WELL
- GMP-1 EXISTING LANDFILL GAS MONITORING PROBE
- GMP-17 PROPOSED LANDFILL GAS MONITORING PROBE
- GMP-8 LANDFILL GAS PROBE TO BE ABANDONED
- PROPOSED LEACHATE FORCEMAIN
- 100-YEAR FLOODPLAIN (SEE NOTE 9)

NOTES:

1. EXISTING CONTOURS AND ELEVATIONS PROVIDED BY COOPER AERIAL SURVEYS CO. FROM AERIAL PHOTOGRAPHY FLOWN 02-16-13. THE GRID SYSTEM IS TIED TO THE TEXAS STATE PLANE COORDINATE SYSTEM NORTH CENTRAL ZONE NAD 27. ELEVATIONS ARE BASED ON NAVD 1988.
2. PERMIT BOUNDARY WAS PREPARED BY WEAVER BOOS CONSULTANTS, LLC – SOUTHWEST IN DECEMBER 2009.
3. REFER TO APPENDIX IIIF–SURFACE WATER DRAINAGE PLAN FOR DRAINAGE DESIGN INFORMATION.
4. FINAL COVER DETAILS ARE PROVIDED IN APPENDIX IIIA–A LINER AND FINAL COVER SYSTEM DETAILS.
5. MAXIMUM FINAL COVER ELEVATION IS 986 FT–MSL. MAXIMUM TOP OF WASTE ELEVATION IS 984.5 FT–MSL.
6. REFER TO APPENDIX IIIA–B FOR TYPICAL CROSS SECTION INFORMATION.
7. AS RAINFALL CONTACTS THE FINAL COVER SYSTEM IT WILL SHEET FLOW TO DRAINAGE SWALES CONSTRUCTED ON THE TOP DECK AND SIDE SLOPES OF THE LANDFILL. THE SWALES DIRECT THE STORMWATER TO DRAINAGE LETDOWN STRUCTURES ON THE SIDE SLOPES. THE LETDOWN STRUCTURES DIRECT THE STORMWATER TO THE PERIMETER CHANNEL/DETENTION POND SYSTEM BEFORE IT IS DISCHARGED FROM THE SITE.
8. REFER TO APPENDIX IIII FOR DETAILS OF THE LANDFILL GAS MANAGEMENT PLAN.
9. REFER TO APPENDIX IIIM FOR FLOODPLAIN INFORMATION.

SHEET IIIJ-2

☐ DRAFT
☒ FOR PERMITTING PURPOSES ONLY
☐ ISSUED FOR CONSTRUCTION
☐ CLIENT APPROVAL BY:

DATE: 05/2012
FILE: 012C-84-11
CAD: IIIJ-LANDFIL COMPLETION PLAN.DWG
DRAWN BY: CC
DESIGN BY: JAE
REVIEWED BY: JPY

REUSE OF DOCUMENTS
THIS DOCUMENT, AND THE IDEAS INCORPORATED HEREIN, AS AN INSTRUMENT OF PROFESSIONAL SERVICE, IS THE PROPERTY OF ITASCA LANDFILL TX, LP AND IS NOT TO BE USED IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF ITASCA LANDFILL TX, LP.

PREPARED FOR
ITASCA LANDFILL TX, LP

REVISIONS

NO.	DATE	DESCRIPTION
1	05/2013	PERMIT MODIFICATION

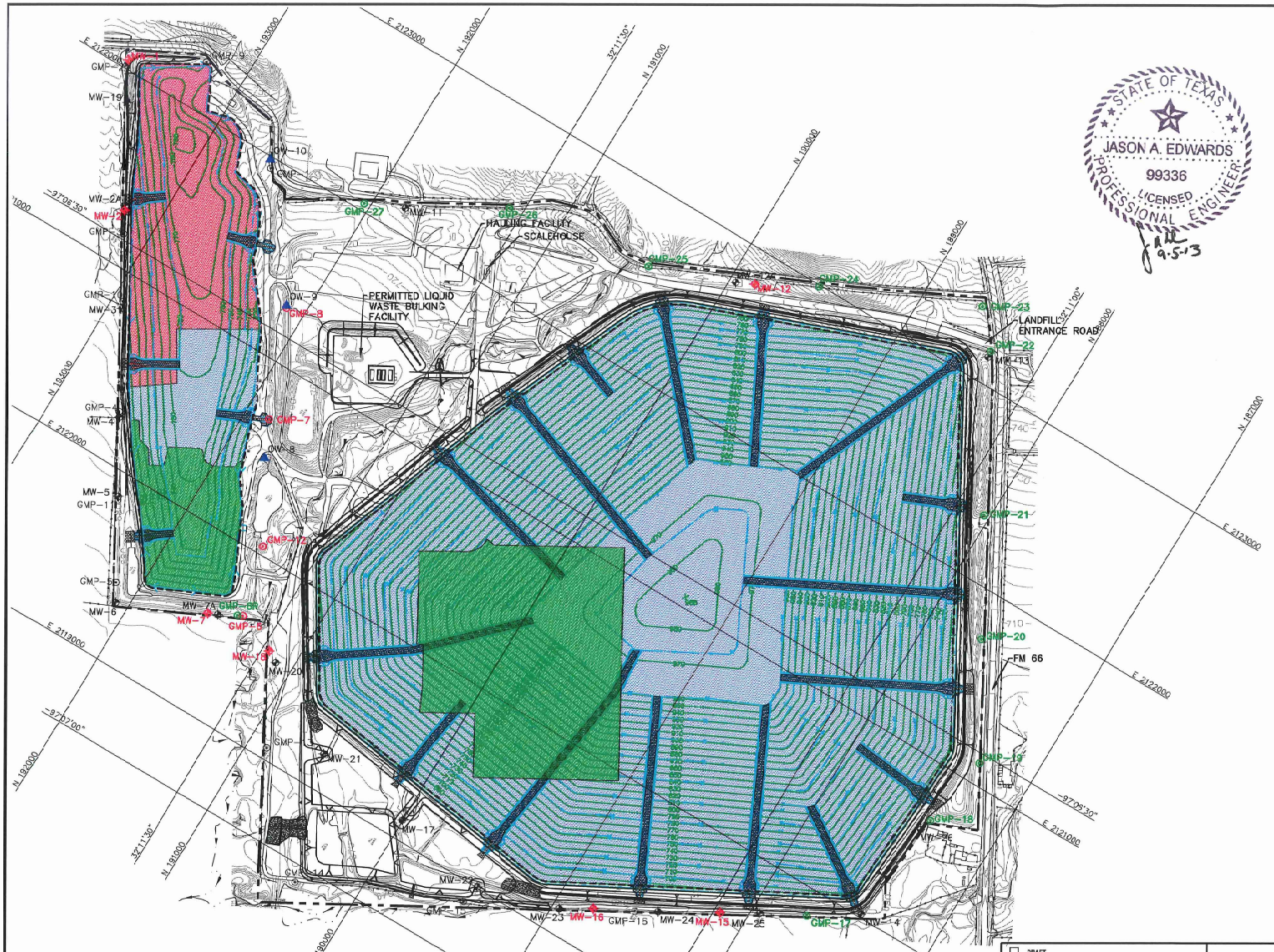
MAJOR PERMIT AMENDMENT
LANDFILL COMPLETION PLAN

ITASCA LANDFILL
HILL COUNTY, TEXAS

Weaver Boos Consultants
TBPE REGISTRATION NO. F-3727

CHICAGO, IL NAPERVILLE, IL COLUMBUS, OH DENVER, CO
FORT WORTH, TX (817) 735-9770
GRIFFITH, IN SOUTH BEND, IN SPRINGFIELD, IL ST. LOUIS, MO

FIGURE IIIJ.1



STATE OF TEXAS
JASON A. EDWARDS
99336
LICENSED
PROFESSIONAL ENGINEER
9-5-13

NOTES:

1. EXISTING CONTOURS AND ELEVATIONS PROVIDED BY COOPER AERIAL SURVEYS CO. FROM AERIAL PHOTOGRAPHY FLOWN 02-16-13. THE GRID SYSTEM IS TIED TO THE TEXAS STATE PLANE COORDINATE SYSTEM NORTH CENTRAL ZONE NAD 27. ELEVATIONS ARE BASED ON NAVD 1988.
2. PERMIT BOUNDARY WAS PREPARED BY WEAVER BOOS CONSULTANTS, LLC - SOUTHWEST IN DECEMBER 2009.
3. MAXIMUM FINAL COVER ELEVATION IS 988 FT-MSL. MAXIMUM TOP OF WASTE ELEVATION IS 984.5 FT-MSL.

SHEET IIIJ-3

- [ ] DRAFT
- [x] FOR PERMITTING PURPOSES ONLY
- [ ] ISSUED FOR CONSTRUCTION
- [ ] CLIENT APPROVAL BY:

DATE: 09/2012
FILE: 0120-84-11
DO: IIIJ-FINAL COVER OPTIONS.DWG
DRAWN BY: VRS
DESIGN BY: JAE
REVIEWED BY: JPY

REUSE OF DOCUMENTS
THIS DOCUMENT, AND THE IDEAS INCORPORATED HEREIN, AS AN INSTRUMENT OF PROFESSIONAL SERVICE, IS THE PROPERTY OF ITASCA LANDFILL TX, LP AND IS NOT TO BE USED IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF ITASCA LANDFILL TX, LP.

PREPARED FOR
ITASCA LANDFILL TX, LP

REVISIONS		
NO.	DATE	DESCRIPTION
1	09/2013	PERMIT MODIFICATION

MAJOR PERMIT AMENDMENT
FINAL COVER OPTIONS

ITASCA LANDFILL
HILL COUNTY, TEXAS

Weaver Boos Consultants
TBPE REGISTRATION NO. F-3727

CHICAGO, IL · NAPERVILLE, IL · COLUMBUS, IN · DENVER, CO
FORT WORTH, TX (817) 735-6776
GRIFFITH, IN · SOUTH BEND, IN · SPRINGFIELD, IL · ST. LOUIS, MO

FIGURE IIIJ.2

G:\0120\84\ISMPA (2013)\IIIJ\clean\IIIJ-2 FINAL COVER OPTIONS.dwg, 1:2

2 FINAL COVER SYSTEM

2.1 Introduction

The final cover system for the Itasca Landfill has been developed to incorporate the requirements of §330.457(f)(4) for each landfill unit. The rules state that within 180 days following the initiation of closure activities as specified in §330.457(f)(3), the owner shall complete the installation of a final cover system designed and constructed to minimize infiltration and erosion. Such a system will include installation of a final cover system and a storm water runoff control system. The storm water runoff controls are addressed in Appendix IIIF – Surface Water Drainage Plan. The surface drainage and erosion control measures included in Appendix IIIF are applicable to all final cover options. The final cover system design is discussed below and is also detailed in Appendix IIIA-A.

2.2 Cover System Design

The final cover system will consist of a Subtitle D composite final cover and pre-Subtitle D soil final cover system or ET final cover system for both pre-Subtitle D and Subtitle D areas; however, the ET final cover system will not be constructed over Class 1 waste areas. The final cover system will provide a low maintenance cover, protect against erosion, reduce rainfall percolation through the cover system and subsequently minimize leachate generation within the landfill. As depicted on Figure IIIJ.1 (and Drawing A.2 – Landfill Completion Plan in Appendix IIIA-A), a slope of 5 percent is provided for the top dome surface and 4H:1V sideslopes are provided to minimize erosion and facilitate drainage of the landfill. A summary of the components of the final cover system for each option is provided below (from top to bottom).

Subtitle D Composite Final Cover System

- An erosion layer consisting of a 24-inch-thick earthen material capable of sustaining vegetative growth. The vegetation will consist of native or introduced grasses capable of providing 90 percent coverage over the cover system.
- A drainage geocomposite drainage layer (250-mil-thick geonet with 6 oz/sy geotextile(s) heat bonded to the top for top slopes and heat bonded to both sides for side slopes).
- A 40-mil, smooth (topslope) and textured (sideslope), linear low-density polyethylene (LLDPE), or other equivalent material.
- An 18-inch-thick compacted clay infiltration layer with a coefficient of permeability of less than or equal to $1x10^{-5}$ cm/s. However, where Class 1 waste is filled above grade the thickness of the infiltration layer that is located adjacent to the Class 1 waste disposal area will be increased to 4 feet with a coefficient of

permeability of less than or equal to $1x10^{-7}$ cm/s (i.e., the 4-foot infiltration layer will be placed on top of the outside slope of the Class 1 containment dike up to the elevation of the top of the 4-foot-thick barrier layer). Refer to Drawings A.3a, A.3b, A.3c, A.14, and A.16 in Appendix IIIA for additional information.

The low permeability components of the composite final cover system (the geomembrane and the 18-inch-thick or 4-foot-thick clay infiltration layer) are designed to minimize infiltration of surface water into the underlying waste material. Details of the composite final cover system are shown on Drawing A.8 in Appendix IIIA. Material specifications, construction, and testing procedures are provided in Appendix IIIJ-A – Standard Subtitle D Final Cover System Quality Control Plan (FCSQCP).

Pre-Subtitle D Final Cover System

- An erosion layer consisting of a 12-inch-thick earthen material capable of sustaining vegetative growth. The vegetation will consist of native and introduced grasses capable of providing 90 percent coverage over the cover system.
- An 18-inch-thick compacted clay infiltration layer with a coefficient of permeability which is equal to or less than the average coefficient of permeability of underlain pre-Subtitle D liners but no greater than $1x10^{-5}$ cm/s.

Pre-Subtitle D final cover is only applicable to the portion of the North Unit with a pre-Subtitle D liner. Material specifications, construction, and testing procedures are provided in Appendix IIIJ-A – Standard Subtitle D Final Cover System Quality Control Plan (FCSQCP).

ET Final Cover System

- A vegetation layer consisting of a minimum 12-inch-thick layer of earthen material capable of sustaining plant growth.
- A 24-inch-thick vegetative support layer consisting of relatively homogenous clay, silty clay, sandy clay or clayey sand.
- A 12-inch-thick soil layer that functions as a foundation layer for the vegetative support layer.

Details of the ET final cover system are provided on Drawing A.10 in Appendix IIIA; design of the ET cover is provided in Appendix IIIJ-C; and the material specifications, construction, and testing procedures are provided in Appendix IIIJ-B – ET FCSQCP.

Vegetation will be established over each of the installed final cover systems to minimize the erosion potential of the cover slopes. This layer was evaluated using the universal soil loss equation (USLE) developed by the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS). The evaluation is presented in Appendix IIIF.

Landfill gas generated in the landfill will be managed as discussed in Appendix IIII–Landfill Gas Management Plan. The landfill gas system will collect the gas generated by deposited waste and control gas emission from the site.

2.3 Installation Methods and Procedures

The final cover system will be constructed in accordance with the requirements listed on the permit drawings in Appendix IIIA-A and the FCSQCPs presented in Appendix IIIJ-A and Appendix IIIJ-B (depending on the final cover option utilized). Testing and evaluation of the final cover system during construction will be in accordance with Appendix IIIJ-A – Standard Subtitle D FCSQCP (applicable to Subtitle D and pre-Subtitle D final covers) and Appendix IIIJ-B – ET FCSQCP.

3 CLOSURE PROCEDURES

3.1 Sequence of Final Cover Placement

The Itasca Landfill may place final cover over each unit throughout the active life of the landfill. As detailed on Drawings I/IIA.4, I/IIA.5, and I/IIA.6, final cover will be placed as the site is being developed. The final cover placement procedure listed below will be followed for each unit until the entire waste footprint is closed:

- Survey controls will be implemented to control the filling of solid waste to the top of the daily/intermediate cover layer elevation.
- The final cover system layers will be constructed over areas that have reached the bottom of final cover grades. Testing of the various components of the final cover system will be performed in accordance with this closure plan (see Section 2.3).
- A final cover certification report, complete with an as-built survey, will be prepared by an independent licensed professional engineer and submitted to the TCEQ for approval. Refer to Appendix IIIJ-B for additional certification and verification requirement information for the ET final cover option.
- The TCEQ approved final cover certification report will be maintained in the Site Operating Record, and the final cover log (see Part IV – Section 4.18.5) will be updated to reflect the area where final cover has been placed. The TCEQ Regional Office will also be notified that final cover placement has occurred at the site.

Note that the placement of final cover does not represent closure of a portion of the site. Closure of each landfill unit is discussed in Section 3.2 and closure of the other MSW units at the site is discussed in Sections 3.3, 3.4, 3.5, and 3.6. Requirements for final closure of the site are discussed in Section 4. Post-closure care activities will commence once the entire site has been closed as discussed in Section 4.

3.2 Landfill Unit Closure During Active Life

Should closure of the landfill become necessary at any time during the active life of the landfill, the following steps will be taken:

- Engineering plans will be developed to address site closure at the time of discontinued waste filling.
- The final waste received will be placed and properly compacted.

- Excavations will be filled with suitable material, and the site will be graded to promote runoff and prevent ponding.
- The final cover system will be constructed according to specifications.
- The top of the landfill will be regraded and reshaped as needed to provide the proper slope for positive drainage.
- As noted above (first bullet), a revised final closure plan will be developed and submitted to the TCEQ for approval.
- Following application of final cover, the site will be vegetated with appropriate grasses to minimize erosion. The established grasses will provide a minimum of 90 percent coverage of the final cover system.
- A surface water management system will be constructed to minimize erosion.
- A closure certification will be prepared by an independent licensed professional engineer and submitted to TCEQ for approval.
- All proper notices and documentation will be filed with the appropriate agencies.

3.2.1 Estimate of Largest Open MSW Fill Area

Consistent with Title 30 TAC §330.503(a), the largest area that could be open within the next year is shown on Figure IIIJ.3 and is 107.1 acres. Consistent with this rule and TCEQ guidelines for financial assurance to complete closure and postclosure activities, financial assurance will be posted for the 107.1-acre current active area as discussed in Appendix IIIL – Closure and Postclosure Care Cost Estimate. The entire 425.8-acre site will also need to be administratively closed. There has been no final cover constructed at the site, and there are no inactive areas.

Supporting calculations are presented in Appendix IIIL – Closure and Postclosure Care Cost Estimate.

3.2.2 Estimate of Maximum Inventory of Waste Ever On Site

The estimate of maximum inventory of waste (defined as waste and daily cover) ever on site over the active life of the facility is approximately 59.819 million cubic yards. The site life calculations (Appendix IIIB) show that approximately 52.3 million cubic yards of airspace remain (using the March 4, 2008, topographic map). Supporting calculations are included in the Site Development Plan, Appendix IIIB – Site Life Calculations.

3.3 Liquid Waste Bulking Facility Closure

It is anticipated that the Liquid Waste Bulking Facility will continue to operate throughout the active life of the Itasca Landfill. During closure of the site, the following steps will be taken to decommission the Liquid Waste Bulking Facility.

- The final waste received or stored at the facility will be solidified and transferred to the landfill for disposal.
- General cleanup of the site, including all areas around the Liquid Waste Bulking Facility and within the building (i.e., removal of bulking agents, washdown of floor, etc.) will be performed.
- The facility equipment will be dismantled and removed from the site.
- The concrete mixing basins will be demolished and the concrete debris will be disposed of. Any soil below the basins that is visually stained will be excavated and disposed of in the landfill.

A description of the Liquid Waste Bulking Facility closure procedures will be included in the closure certification report.

3.4 Citizens Convenience Center Closure

The Citizens Convenience Center will likely operate throughout the active life of the facility. During closure of the site, the Citizens Convenience Center will be decommissioned. Closure activity will include a general cleanup of the area. All roll-offs will be emptied at the landfill working face and removed from the site.

3.5 Bioremediation Facility Closure Plan

As shown on Figures IIIJ.3 and IIIJ.4, the bioremediation facility (Biopad) is located on approximately 22 acres between the North and South Units. The Biopad was permitted to accept Petroleum Storage Tank (PST) regulated wastes and other non-hazardous petroleum substance waste materials, as authorized by TCEQ. When waste materials reached target remediation levels, the treated soils were used as landfill daily cover or disposed of in the Class I non-hazardous industrial solid waste disposal area. The Biopad has not received waste since 1996, and the last batch of treated material was removed in November 2000. As shown on Figure IIIJ.4, according to site personnel the only Biopad area used to test petroleum contaminated soils during the active life of this facility was located beneath the current hauling facility parking lot. The facility has been inactive since 2000 and will remain inactive throughout the life of the Itasca Landfill.

As shown on Drawing IIIJ.4, the Liquid Waste Bulking Facility, Citizens Convenience Center, and hauling facility have been constructed over the former Biopad area. The undeveloped area within the former Biopad area consists of a vegetated, open space area. The closure requirements listed under previous permits for this facility included (1) the removal of all treatment plots (which occurred in November 2000), (2) analytical testing of the area used to treat petroleum contaminated soils, (3) testing of the retention pond water, and (4) removal of the 3-foot-thick compacted clay liner located within the boundary of the Biopad. This Closure Plan updates the previous plan and the closure procedures for this inactive unit are listed below.

(1) At closure, the area that was previously used to treat contaminated soils will be sampled after the parking lot material is removed. A 50-foot grid will be established over the treatment area shown on Figure IIIJ.4. Shallow (0 to 6-inch depth) grab soil samples will be collected from each grid node location and placed into appropriate laboratory-prepared soil containers. In addition, 20 percent of the boreholes completed at each grid node will be extended to obtain an additional sample from the borehole at a depth between 2.5 feet and 3.0 feet. The soil samples will be tested for TPH, BTEX and lead by an NELAC-certified analytical laboratory. Soil will be tested for TPH and BTEX. If the sampled results show no hydrocarbon or lead detections, the soil liner will be vegetated and left in place. If the hydrocarbons or lead are detected, the facility will obtain TCEQ approval of a work plan which will set forth procedures to remove and dispose of the contaminated liner material. The work plan will:

- identify the areas that are contaminated and quantify the estimated volume of soil liner material that will be removed;
- identify the method to be used for soil excavation and disposal; and
- include a detailed sampling plan that will be implemented to verify that the contaminated soils have been removed.

Verification that the work plan has been successfully implemented will be included in the Closure Certification Report.

(2) If any water remains in the retention pond, the water will be tested for the constituents listed in the facility's permitted Groundwater Sampling and Analysis Plan. If constituent levels are below the applicable maximum concentration limits (MCLs) for total metals and no VOCs are detected, then no further action is required. If constituent levels are above the MCLs (for total metals) or any VOCs are detected in the pond water, then the water will be considered contaminated and the facility will obtain TCEQ disposal authorization prior to retention pond water removal and disposal. Verification that the contaminated water has been removed from the pond will be included in the Closure Certification Report.

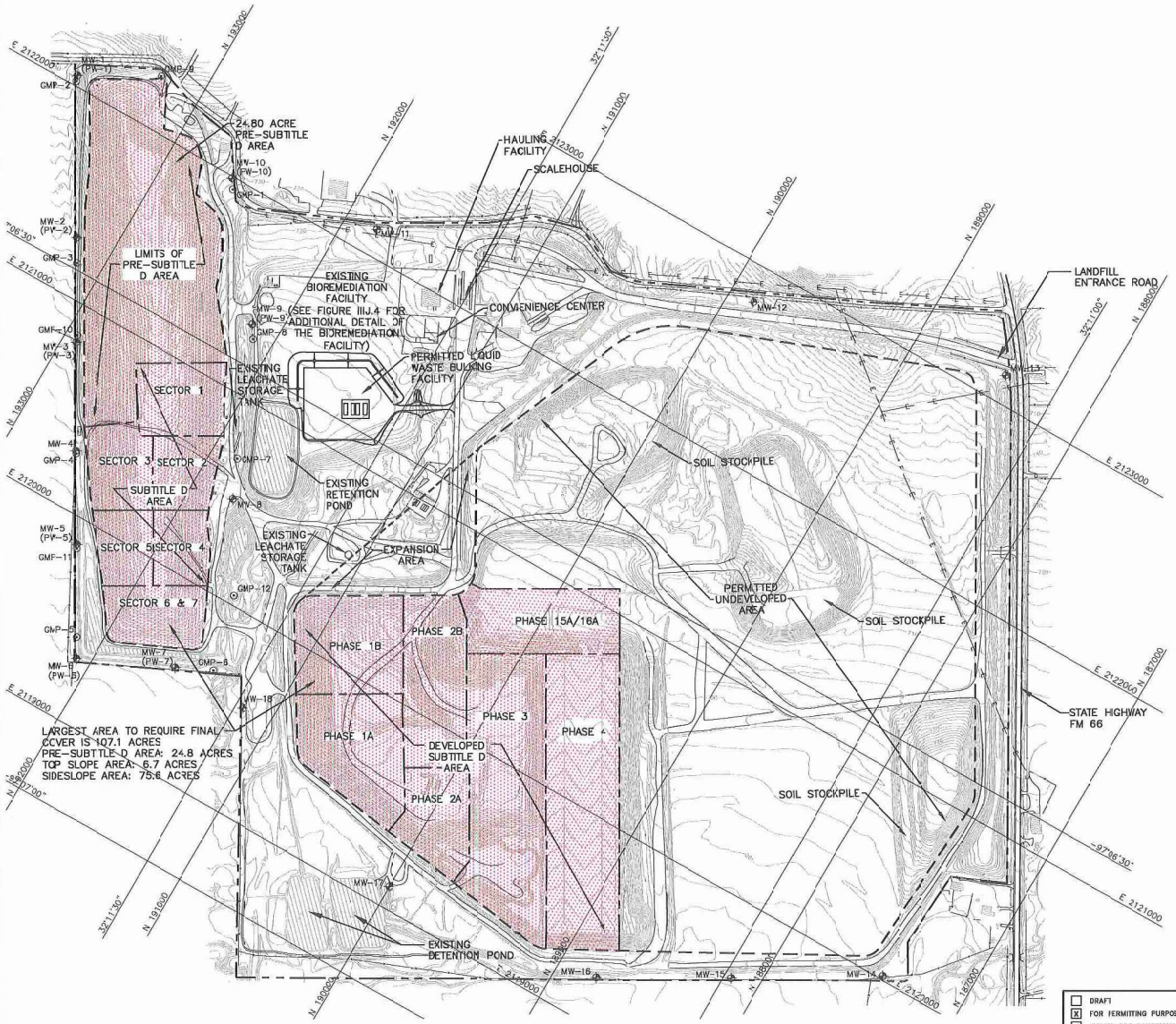
(3) To verify that sediment in the retention pond has not been impacted by Biopad operations, three shallow composite pond sediment samples will be collected and analyzed for TPH, BTEX, and lead by an NELAC-certified analytical laboratory. If the sampled results show no hydrocarbon or lead detections, the pond sediments will be left in place. If the hydrocarbons or lead are detected, the facility will obtain TCEQ approval of a work plan which will set forth procedures to remove and dispose of the contaminated sediments. The work plan will include a detailed sampling plan that will verify the contaminated sediments have been removed from the pond, the method used to remove the sediments, and the disposal location. Verification that the contaminated pond sediments have been removed from the pond will be included in the Closure Certification Report.

(4) Upon completion of the closure activities, a closure certification report will be submitted by an independent licensed Professional Engineer and submitted to the TCEQ for approval.

At closure, the former Biopad area will be inspected to ensure the undeveloped area is sufficiently vegetated to prevent erosion. The results of the inspection will be included in the closure certification report.

3.6 Hauling Facility and Other Related Structures Closure

The hauling facility and other related structures will likely operate throughout the active life of the facility. Closure activities will include a general cleanup of the area. In addition, all structures to remain will be secured. A permit modification will be submitted to the TCEQ if Itasca Landfill plans to operate the hauling facility past the date of landfill closure.



0 300 600
SCALE IN FEET

LEGEND

- PERMIT BOUNDARY
- PERMITTED LIMIT OF WASTE
- PROPOSED LIMIT OF WASTE
- EXISTING CONTOUR
- E 2122000 — STATE PLANE COORDINATE
- -97°06'00" — GEODETIC COORDINATE SYSTEM
- SUBTITLE D CELL BOUNDARY
- MW-3 — EXISTING GROUNDWATER MONITORING WELL
- GMP-2 — EXISTING GAS PROBE
- ACTIVE FILL AREA REQUIRING CLOSURE

NOTES:

1. EXISTING CONTOURS AND ELEVATIONS PROVIDED BY METROPOLITAN AERIAL SURVEY FROM AERIAL PHOTOGRAPHY FLOWN 03-04-08. THE GRID SYSTEM IS TIED TO THE TEXAS STATE PLANE COORDINATE SYSTEM NORTH CENTRAL ZONE NAD 27. ELEVATIONS ARE BASED ON NAVD 1988.
2. PERMIT BOUNDARY WAS PREPARED BY WEAVER BOOS CONSULTANTS, LLC – SOUTHWEST IN DECEMBER 2009.

STATE OF TEXAS
NEVZAT TURAN
84059
LICENSED
PROFESSIONAL ENGINEER
6-18-12

- [ ] DRAFT
- [X] FOR PERMITTING PURPOSES ONLY
- [ ] ISSUED FOR CONSTRUCTION
- [ ] CLIENT APPROVAL BY: _____

DATE: 05/2012
FILE: 0120-84-11
CAD: IIIJ.3 AREA REQ COVER.DWG
DRAWN BY: YRS
DESIGN BY: TR
REVIEWED BY: NT

REVISIONS

NO.	DATE	DESCRIPTION

PREPARED FOR
ITASCA LANDFILL TX, LP

MAJOR PERMIT AMENDMENT
LARGEST AREA TO REQUIRE FINAL COVER

ITASCA LANDFILL
HILL COUNTY, TEXAS

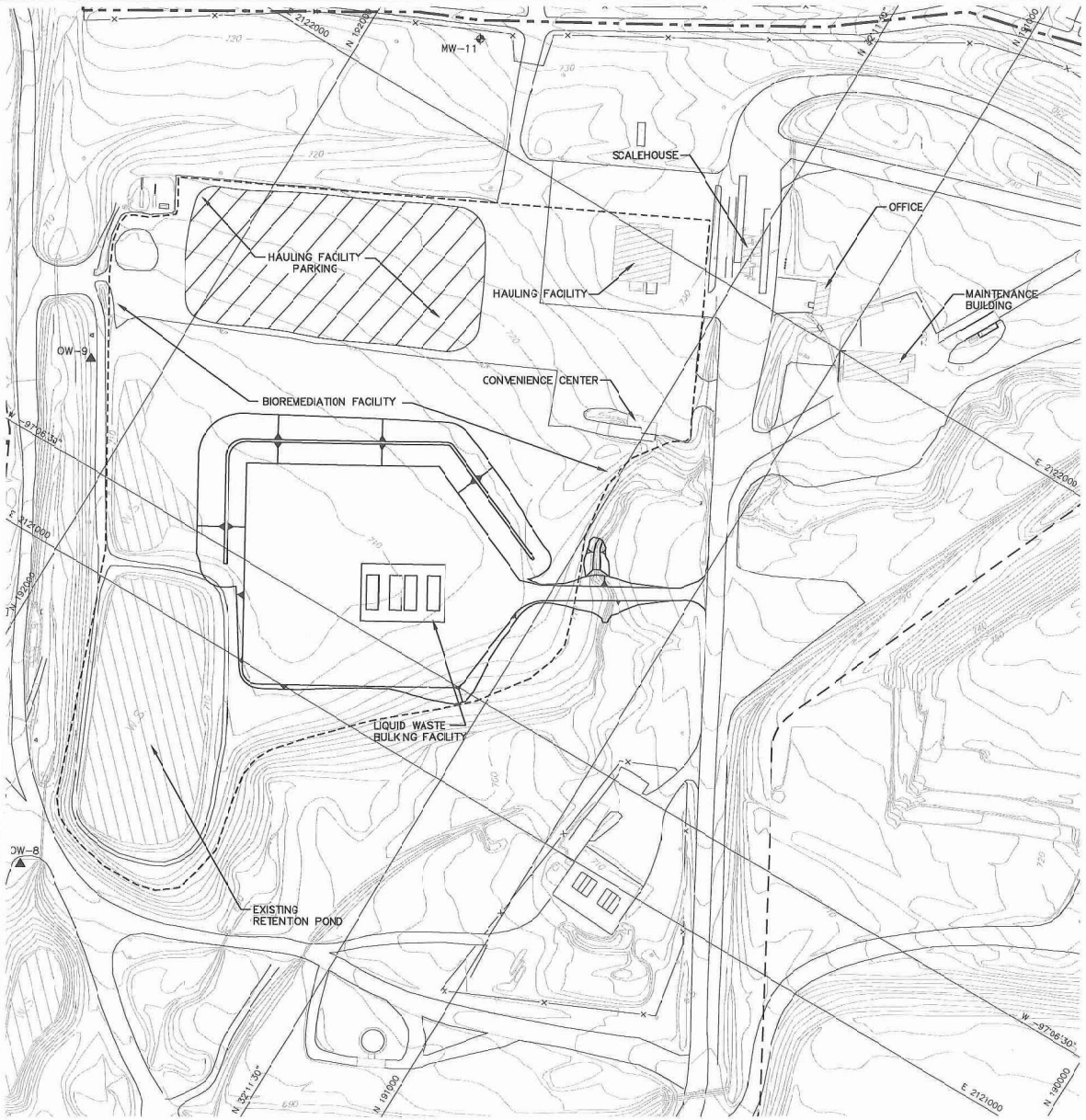
Weaver Boos Consultants
TBPE REGISTRATION NO. F-3727

CHICAGO, IL · NAPERVILLE, IL · COLUMBUS, OH · DENVER, CO
FORT WORTH, TX (817) 735-9770
GRIFFITH, IN · SOUTH BEND, IN · SPRINGFIELD, IL · ST. LOUIS, MO

FIGURE IIIJ.3

SHEET IIIJ-12

G:\0120\04\EXPANSION (2009)\CLEAN\IIIJ\IIIJ.3 AREA REQ COVER.dwg, 6/8/2012 2:32:33 PM, jwilson, 1:2



0 100 200
SCALE IN FEET

LEGEND

- PERMIT BOUNDARY (SEE NOTE 2)
- LIMIT OF WASTE
- CELL BOUNDARY
- N 192000 — STATE PLANE COORDINATE SYSTEM
- N 32°11'30" — GEODETIC COORDINATE SYSTEM
- 718 — EXISTING CONTOUR
- MW-11 — GROUNDWATER MONITORING WELL
- OW-8 — OBSERVATION WELL
- APPROXIMATE BIOREMEDIATION FACILITY LIMITS (SEE NOTE 3)
- APPROXIMATE AREA USED TO TREAT PETROLEUM CONTAMINATED SOILS DURING THE ENTIRE LIFE OF THE BIOPAD.

NOTES:

1. EXISTING CONTOURS AND ELEVATIONS PROVIDED BY METROPOLITAN AERIAL SURVEY FROM AERIAL PHOTOGRAPHY FLOWN 03-04-08. THE GRID SYSTEM IS TIED TO THE TEXAS STATE PLANE COORDINATE SYSTEM NORTH CENTRAL ZONE NAD 27. ELEVATIONS ARE BASED ON NAVD 1988.
2. PERMIT BOUNDARY WAS PREPARED BY WEAVER BOOS CONSULTANTS, LLC – SOUTHWEST IN DECEMBER 2009.
3. THE BIOREMEDIATION FACILITY HAS NOT BEEN USED SINCE NOVEMBER 2000. REFER TO SECTION 3.5 FOR ADDITIONAL INFORMATION.

STATE OF TEXAS
JEFFREY P. YOUNG
79809
LICENSED
PROFESSIONAL ENGINEER

7-19-12

☐ DRAFT
☒ FOR PERMITTING PURPOSES ONLY
☐ ISSUED FOR CONSTRUCTION
☐ CLIENT APPROVAL BY: _____

DATE: 05/2012
FILE: 0120-84-11
CAD: III.4-BIC. REMED. PAD.dwg

DRAWN BY: VRS
DESIGN BY: KAV
REVIEWED BY: JPY

REUSE OF DOCUMENTS
THIS DOCUMENT, AND THE IDEAS INCORPORATED HEREIN, AS AN INSTRUMENT OF PROFESSIONAL SERVICE, IS THE PROPERTY OF ITASCA LANDFILL TX, LP AND IS NOT TO BE USED IN WHOLE OR IN PART, WITHOUT THE WRITTEN AUTHORIZATION OF ITASCA LANDFILL TX, LP.

PREPARED FOR
ITASCA LANDFILL TX, LP

REVISIONS

NO.	DATE	DESCRIPTION

MAJOR PERMIT AMENDMENT
BIOREMEDIATION PAD PLAN

ITASCA LANDFILL
HILL COUNTY, TEXAS

Weaver Boos Consultants
TBPE REGISTRATION NO. F-3727

CHICAGO, IL
NAPERVILLE, IL
COLUMBUS, OH
DENVER, CO
FORT WORTH, TX (817) 735-9770
CRIFFITH, IN
NORTH BEND, IN
SPRINGFIELD, IL
ST. LOUIS, MO

FIGURE III.4

SHEET III-13

4 SCHEDULE OF UNIT CLOSURE AND FACILITY FINAL CLOSURE

4.1 Final Closure Requirements

The site will be closed in an orderly fashion, consistent with §330.457 and §330.461, implementing the following steps:

- No later than 45 days prior to initiation of final closure activities for the municipal solid waste landfill (MSWLF) unit, the Executive Director of TCEQ will be notified of the intent to close the unit and that a notice of the intent to close the unit has been placed in the operating record.
- No later than 90 days prior to initiation of a final facility closure, a public notice of facility closure which contains the name, address, and physical location of the facility, the permit number, and the last date of intended receipt of waste, will be provided in the newspaper of the largest circulation in the vicinity of the facility. Itasca Landfill TX, LP will also make available a copy of the approved final closure and postclosure plan at the landfill office for public access and review.
- Consistent with §330.461(b) and following notification of the Executive Director of TCEQ, a minimum of one sign will be posted at the main entrance and all other frequently used points of access for the facility notifying all persons utilizing the facility of the closure date or date after which further receipt of waste is prohibited. In addition, barriers or gates will be installed at access points following the closure date to prevent unauthorized disposal or dumping of solid waste at the facility.
- Final closure activities will commence for each MSWLF unit no later than 30 days after the date the MSWLF unit receives the known final receipt of wastes. If the MSWLF unit has remaining capacity and there is a reasonable likelihood that the MSWLF unit will receive additional wastes, final closure activities will commence no later than 1 year after the most recent receipt of wastes.
- Final closure activities of the MSWLF unit will be completed in accordance with the Closure Plan (this appendix) within 180 days following the initiation of closure activities as specified in §330.457(f)(3). If necessary, as noted in §330.457(f)(4), a request for an extension of the completion of final closure activities may be submitted and granted by the Executive Director. This request will include all applicable documentation necessary to demonstrate that final closure will take longer than 180 days and all steps have been taken and will

continue to be taken to prevent threats to human health and the environment from the unclosed site.

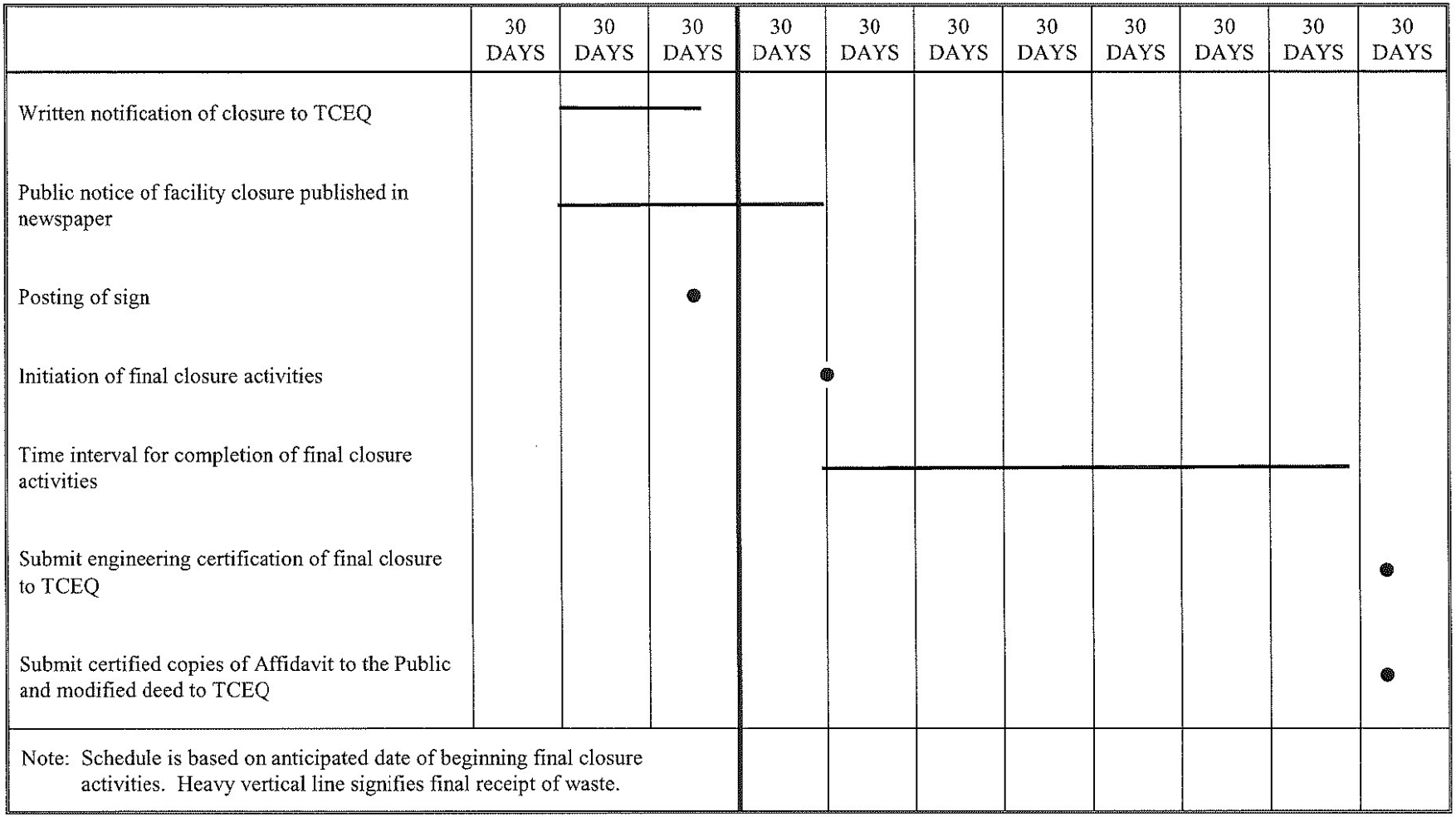
- Following completion of final closure activities, a documented certification, signed by an independent licensed professional engineer, will be submitted to the Executive Director of the TCEQ for review and approval. This certification will verify that final closure has been completed in accordance with the approved final closure plan and will include all applicable documentation necessary for certification of final closure. Once approved, this certification will be placed in the Site Operating Record.
- Within 10 days after completion of final closure activities of all MSW landfill units, a certified copy of an Affidavit to the Public (most current format provided by the TCEQ will be used) will be submitted to the Executive Director of the TCEQ by registered mail and placed in the facility's Site Operating Record. In addition, a certified notation will be recorded on the deed to the facility that will in perpetuity notify any potential purchaser of the property that the land has been used as a landfill facility and the use of the land is restricted according to the provisions specified in §330.465. Within 10 days after completion of final closure activities of the facility, a certified copy of the modified deed will be submitted to the Executive Director and placed in the operating record.

Following receipt of the required final closure documents and an inspection report from the TCEQ Regional Office verifying proper closure of the MSWLF facility according to this Closure Plan (this appendix), the Executive Director may acknowledge the termination of operation and closure of the facility and deem it properly closed. The steps in the closure process are depicted on Figure IIIJ.5 – Final Closure Schedule. In accordance with §330.463(b), the postclosure care period begins immediately upon the date of final closure, as approved by the executive director.

4.2 Provisions for Extending Closure Period

If the Itasca Landfill has remaining capacity at the time of its closure, final closure activities will begin no later than one year after the most recent receipt of wastes. A request for an extension beyond the one-year deadline for the initiation of final closure may be submitted to the Executive Director for review and approval and will include all applicable documentation to demonstrate that the unit or site has the capacity to receive additional waste, and that the Itasca Landfill has taken all steps necessary to prevent threats to human health and the environment.

Itasca Landfill
Figure IIIJ.5 Final Closure Schedule



APPENDIX F- SITE OPERATING AND CONTINGENCY PLAN

1 INTRODUCTION

This Site Operating Plan (SOP) has been prepared for the Itasca Landfill consistent with Title 30 TAC §330.65. The purpose of this SOP is to provide guidance to site management and operating personnel to meet the general and site specific requirements of §330 Subchapters D and E. This document also provides an operating guide for site management to maintain the facility in compliance with the engineering design and applicable regulatory requirements of the TCEQ. The plan may also serve as a reference source and assist in personnel training. This SOP, the permit, and the current TCEQ regulations will be kept onsite throughout the facility's operating life.

Consistent with §330.127(3), the operating procedures outlined in this SOP will be followed and will be considered a part of the operating record of the facility. Landfill operations will be conducted in a professional manner by trained and qualified personnel who will be responsible for placement of waste in approved disposal cells utilizing equipment and procedures and standard industry practices to ensure protection of operating personnel, human health, and the environment.

Wherever the term "executive director" or "TCEQ" is used in this SOP, these terms shall refer to the executive director of the TCEQ or the designated representative of the TCEQ. References to information in the permit or permit application for this facility shall refer to the most current version of these documents, including any amendments, modifications, or revisions as approved.

If any questions arise regarding this SOP, Itasca Landfill personnel should consult with:

1. Texas Commission on Environmental Quality
   Municipal Solid Waste Section
   Austin, Texas
   Telephone: (512) 239-2334

2. Texas Commission on Environmental Quality, Region 9
   Waco, Texas
   Telephone: (254) 751-0335

3. Texas General Land Office
   Spill Reporting Telephone: 1-800-832-8224

2 PERSONNEL AND TRAINING

2.1 Personnel

This section lists the personnel involved with the operation of the Itasca Landfill. The Itasca Management Team and Site Personnel are listed on the organizational chart shown on Figure 2.1. The following subsections describe the personnel involved with operating the Itasca Landfill. In addition, a summary table noting various site personnel and training requirements listed in the following section is provided in Table 2.1

2.1.1 Itasca Landfill Management Team

The Region Vice President has ultimate management and oversight responsibilities for all Republic Services, Inc. hauling and disposal operations within the region. The Area President is responsible for all hauling, transfer station, and landfill operations in the district. The Area President's responsibilities include staff management, financial planning, as well as other management responsibilities. The Area President reports to the Region Vice President. The General Manager is responsible for operations oversight at several landfills in the area including the Itasca Landfill. The General Manager reports to the Area President. Other corporate resources that are available to the Itasca Landfill management team are discussed in Section 2.1.9.

2.1.2 Landfill Manager

The Landfill Manager or his designee (also known as Site Manager) is responsible for daily operations, administers the facility's SDP, SOP, and will also serve as the emergency coordinator. This person is responsible for assuring that adequate personnel and equipment are available to provide facility operation in accordance with this SOP, the SDP, TCEQ regulations, and other applicable local, state or federal regulations. The Landfill Manager or his designee will also be trained to implement the requirements listed in the site's SWP3 and SPCC plans. The Landfill Manager or his designee will maintain an adequate level of competency, training and experience to fulfill these duties. The Landfill Manager or his designee reports directly to the General Manager. The Landfill Manager or his designee will designate individual(s) to fulfill his duties during periods when the Landfill Manager or his designee is absent. This individual will have the same qualifications and training as the Landfill Manager or his designee. Wherever this SOP provides that responsibility or authority is assigned to the Landfill Manager or his designee, this responsibility or authority is automatically transferred to the individual so designated by the Landfill Manager or his designee for this duty when the Landfill Manager or his designee is not present. The delegated individual will be trained by the

Landfill Manager or his designee or General Manager so that they have a complete understanding of the contents of this SOP. The designated individual will have a minimum of 6 months of landfill operation experience or 6 months of on-the-job training by the Landfill Manager or his designee or General Manager.

The Landfill Manager or his designee must hold a Class A License and will have a minimum of 6 months of landfill operation experience or 6 months of on-the-job training by the General Manager. The Landfill Manager or his designee must be familiar with the specific operating procedures set forth in this plan and will participate in training with other employees. The Landfill Manager or his designee, or his designee, is also responsible for routine site inspections as described herein.

The Landfill Manager or his designee's responsibilities include the following:

1. Directing site personnel including Laborers, Spotters, Equipment Operators, Scale Operators, and Mechanics in the performance of tasks necessary for daily site operations.
2. Identifying any additional equipment or personnel necessary for normal operations in the event of equipment breakdowns, changes in waste volumes accepted, or other circumstances.
3. Performing inspections and completing inspection forms and checklists. The Landfill Manager or his designee may delegate this responsibility to other staff.
4. Monitoring and evaluating the performance of employees with respect to assigned duties and compliance with regulatory requirements.
5. Anticipating changes to the operating practices necessary due to changes in the weather, disposal location, or other conditions affecting site operations.
6. Ensuring that inspections and monitoring (e.g., leachate collection system, GCCS, perimeter LFG monitoring, and groundwater monitoring) are completed on schedule and in accordance with all requirements.
7. Monitoring and abating any nuisance conditions, such as litter, odor, dust, and mud tracking.

2.1.3 Scale Operators

The primary job of the Scale Operators, stationed near the site entrance, is to maintain complete and accurate records of vehicles and solid waste entering the facility. The Scale Operators will be trained in site safety procedures, to visually check for unauthorized wastes, to weigh vehicles, collect waste disposal fees, and direct vehicles to the working face. The Scale Operators report to the Landfill Manager or his designee or his designee. Specifically Scale Operators are required to: (1) monitor the incoming vehicles for type of waste and exclude prohibited waste; (2) inspect waste loads to confirm that they are authorized for disposal; (3) review manifests and other shipping documents: (4) record

incoming waste loads; (5) review and confirm special waste documents; and (6) accept tipping fees. Scale Operators shall direct visitors to their destination within the facility.

Scale Operators receive training from the Landfill Manager or his designee or an outside source with respect to special waste evaluation and acceptance. Any questions regarding acceptance of special waste are to be addressed to the Landfill Manager or his designee, Special Waste Department, or the Special Waste Liaison.

The minimum qualifications for the Scale Operators are being able to fulfill the duties described in this section. In addition, a high school diploma, GED certificate or equivalent academic training is required. Scale Operators will also complete a 90-day on-the-job training program administered by the Landfill Manager or his designee or General Manager.

2.1.4 Equipment Operators

The Equipment Operators report to the Landfill Manager or his designee. Equipment Operators are responsible for the safe operation of the equipment. As the personnel most closely involved with the actual landfill operation, these employees are responsible for being alert for potentially dangerous conditions, or careless and improper actions on the part of nonemployees and other persons while on the premises. Equipment Operators monitor and direct unloading vehicles and can also be responsible for maintenance, construction, litter abatement, and general site cleanup. Equipment Operators are also responsible for identifying prohibited wastes as discussed in Section 4.2. The Equipment Operators will intervene as necessary to prevent accidents. Equipment Operators will also report any operational problems to the Landfill Manager or his designee. Equipment Operators that are hired on the basis of previous heavy equipment experience may be assigned to operate specific types of equipment without additional training. Upon their employment, all Equipment Operators without experience in the equipment assigned will receive on-the-job training and oversight from an experienced operator until the new operator becomes proficient on the particular piece(s) of equipment to which he has been assigned, or until he is reassigned to a different piece of equipment for which his previous training or experience is adequate. Equipment Operators may also be required to assist in bird control activities under the supervision of the Landfill Manager or his designee or his designee.

All Equipment Operators are required to wear safety equipment, which may include gloves, hardhats, boots, safety glasses, and high visibility clothing, as appropriate, for their work assignments.

The minimum qualifications for the Equipment Operators are being able to fulfill the duties described in this section. In addition, the Equipment Operators will have a minimum of 6 months of equipment operation experience or complete a 90-day on-the-job training program administrated by a supervisor.

2.1.5 Spotters and Laborers

Spotters and Laborers will be assigned to collect litter, direct waste vehicles at the working face(s), direct traffic at the waste stabilization basin, and perform other tasks as needed. Spotters are also responsible for identifying prohibited wastes as discussed in Section 4.2. Spotters and Laborers will either be Itasca Landfill employees, contract employees, or a combination of both. Laborers may also be required to assist in bird control activities under the supervision of the Landfill Manager or his designee or his designee.

Spotters and Laborers will be required to wear safety equipment, as appropriate for their work. Contract employee oversight will be by an Itasca Landfill employee. Spotters and Laborers report to the Landfill Manager or his designee or his designee.

The minimum qualifications for the Spotters and Laborers are being able to fulfill the duties described in this section. Spotters and Laborers will also complete a 90-day on-the-job training program.

2.1.6 Mechanics

Mechanics perform necessary and routine maintenance on equipment. Mechanics may substitute as Equipment Operators, if needed, provided they have received the required training. Mechanics report to the Landfill Manager or his designee or his designee. The minimum qualifications for the Mechanics are being able to fulfill the duties described in this section (i.e., Section 2.1.6). Mechanics will also complete a 90-day on-the-job training program. The site may also use third party mechanics to perform maintenance on the equipment.

2.1.7 Other Site Personnel

Other Site Personnel or Laborers may be employed from time to time in categories such as maintenance, construction, litter abatement, and general site cleanup. Other Site Personnel and Laborers report to the Landfill Manager or his designee or his designee. The Landfill Manager or his designee will verify that "other site personnel" employed at the site receive training that is consistent with their job description. The Landfill Manager or his designee will utilize Table 2.1 as a guide to assigning the training requirements for "other site personnel." Also, additional personnel will be utilized in the event of a temporary waste inflow increase due to a large special event project.

2.1.8 Other Corporate Resources

Republic Services, Inc., possesses additional solid waste management and operational resources, including consulting and management resources which are available to site personnel, as needed. The Landfill Manager or his designee, or General Manager can contact appropriate personnel to provide additional assistance at any time.

The Special Waste Department will provide review and approval of pre-authorized requests for special wastes received at the site. The Special Waste Liaison/Compliance Coordinator may also provide this pre-authorization approval for special wastes and will provide oversight for special waste acceptance by the Scale Operators and assist with other site regulatory matters, as requested by the General Manager or Landfill Manager or his designee. The Special Waste Liaison/Compliance Coordinator shall have a minimum of 6 months of experience performing the duties described above as well as complete a 90-day on-the-job training program.

The Safety Manager and the Environmental Manager support the General Manager and Landfill Manager or his designee. The Environmental Manager is responsible for environmental compliance, engineering, and construction issues as well as verifying that the site is developed consistent with the SDP (minimum qualification – degree from an accredited university).

2.2 Training

The Landfill Manager or his designee and the Itasca Landfill management team will train the Equipment Operators, Scale Operators, Mechanics, Laborers, and Spotters in the contents of this SOP, as applicable. Itasca Landfill personnel will be trained pursuant to any applicable TCEQ regulations regarding training of MSW facility personnel. Site personnel will receive training in safety procedures, contingency plans, and the requirements of the permit for this facility, as applicable. Site training and safety meetings will be scheduled at least once per month. If a regular monthly scheduled meeting is canceled, it will be rescheduled or combined with the scheduled training in the following month. Site personnel shall be scheduled for attendance at training sessions to allow site operations to continue during training sessions. Although training topics for each month may vary, training shall be conducted at least annually for each of the following topics:

- Load inspection procedures
- Detection and control of hazardous wastes, prohibited PCB wastes (refer to Section 4.20.10 for information regarding acceptance of certain types of PCB wastes), and other prohibited wastes
- Identification of Toxic Substance Control Act (TSCA) PCB wastes
- Asbestos waste management
- Waste handling procedures (acceptable and prohibited wastes)
- Emergency Response
- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, communications or alarm systems
- Health and Safety

- Litter control and windblown waste pick-up
- Record Keeping
- Odor Detection and Control
- Properties of methane gas and safety procedures for methane gas
- Response to groundwater contamination incidents (i.e., compliance with SPCC Plan)
- Shutdown of operations (i.e., end of day closure procedures)
- Identification of Protected, Threatened, and Endangered Species (refer to Section 4.14)
- Access Control and Site Security

At a minimum, facility personnel will be trained in the procedures noted above (as applicable; also refer to Table 2.1 for required training topics) within 6 months of the effective date of their initial employment of promotion to a new position.

In addition to the above, staff conducting random inspection procedures specified in this SOP will receive training on all aspects of the completion of random inspections and instruction on the identification of all special and prohibited wastes. Staff conducting random inspection procedures will maintain a thorough understanding of the SOP and will be trained in the following areas: (1) customer notification and load inspection procedures, (2) identification of regulated hazardous, PCB, and prohibited waste, (3) waste-handling procedures, (4) health and safety, and (5) recordkeeping. These personnel will have knowledge of barrel types, possible types of liquids, and company names on trucks that could be industrial or hazardous waste generators or generators of other unauthorized waste. In addition, key on-site personnel may attend the Texas Environmental Training & Compliance training course for waste screening or other TCEQ approved course.

Records of training procedures, topics covered, and personnel attending will be placed in the Site Operating Record. Records will include a written description of the type and amount of both introductory and continuing training that is provided to each employee. Records will also note that an annual review of the training that is provided will be completed. Selected equipment operators, and other personnel may also receive training at TCEQ-sponsored or other appropriate training courses, as deemed appropriate by the Landfill Manager or his designee or General Manager.

Table 2.1
Site Personnel and Training Summary

Position	Minimum Qualifications	Job Description	Required Training Topics													
			Site Orientation	Site Operations	Endangered Species	Prohibited Waste Identification	Safety	Fire Prevention	Load Inspection	SPCC	Emergency Response	Landfill License	Litter Control	Random Inspections	SWPPP	TSCA PCB Waste Identification
Landfill Manager or his designee	Class A License	Refer to Section 2.1.2	X	X	X	X	X	X	X	X	X	A	X	X	X	X
Scale Operators	The minimum qualifications for the Scale Operators are being able to fulfill the duties described in Section 2.1.3 as well as a high school diploma or equivalent and the completion of a 90-day on-the-job training program (refer to Section 2.1.3 for more information).	Refer to Section 2.1.3	X			X	X	X	X		X			X		X
Equipment Operators	The minimum qualifications for the Equipment Operators are being able to fulfill the duties described in Section 2.1.4 as well as a minimum of 6 months of experience or the completion of a 90-day on-the-job training program.	Refer to Section 2.1.4	X			X	X	X	X	X	X		X	X	X	X
Spotters and Laborers[1]	The minimum qualifications for the Spotters and Laborers are being able to fulfill the duties described in Section 2.1.5 as well as the completion of a 90-day on-the-job training program.	Refer to Section 2.1.5	X			X	X	X	X		X		X	X	X	X
Mechanics	The minimum qualifications for the Mechanics are being able to fulfill the duties described in Section 2.1.6 as well as the completion of a 90-day on-the-job training program.	Refer to Section 2.1.6	X				X	X		X					X	
Special Waste Department	The Special Waste Liaison/Compliance Coordinator shall have a minimum of 6 months experience performing the duties described in Section 2.1.8. In addition, personnel filling these positions will complete a 90-day on-the-job training program.	Refer to Section 2.1.8	X			X			X					X		X

[1]Laborers that are only hired to collect windblown waste will only be required to receive training for the following items: Site Orientation, Safety, and Litter Control
[2]The special waste Liaison/compliance coordinator may not be located at the site. The individual may be located in another facility or office.

47

3 EQUIPMENT

Sufficient quantity and quality of equipment will be provided onsite at the Itasca Landfill to conduct site operations in accordance with the volume of waste accepted at the facility, design and permit conditions.

The equipment listed in Table 3.1 will be available for use at the facility. Equipment requirements may vary in accordance with the method of landfill operations or the waste acceptance rate at any given time. Additional equipment will be provided by Itasca Landfill as required for increasing volumes of incoming solid waste. Other equivalent types of equipment by other manufacturers may be substituted on an as-needed basis, at the discretion of the Landfill Manager or his designee or General Manager. The equipment and Scale House will be equipped with fire extinguishers. Backup equipment will be made available to Itasca Landfill on an as needed basis from other Republic Services, Inc., landfills or other sources. The backup equipment will be equivalent to the equipment requirements listed in Table 3.1.

Table 3.1
Equipment Dedicated to the Itasca Landfill

Equipment	Minimum Number of Equipment Needed for Each Range of Waste Volume[1, 6, 7, 8]				Typical Size[1]	Function
	0 | 1,500 Tons/Day[4]	1,500 | 3,000 Tons/Day[4]	3,000 | 6,000 Tons/Day[4]	6,000 | 10,000 Tons/Day[4]		
Compactor(s)	1	2	3	4	115,000 lbs	Trash compaction
Dozer(s)	1	2	2	3	150 hp or 35,000 lbs	Movement and placement of refuse and soil. May also be used to assist with waste compaction.
Articulated Dump Truck[5]	1	1	2	2	Up to 40 tons	Excavation and hauling of soil, and fire fighting support
Excavator	1	1	2	3	10 foot reach	Excavation of soil, fire fighting support
Motorgrader	1	1	2	2	50 hp	Maintenance of interior roads
Pickup Truck(s)	1	1	2	2	¼ ton	Personnel use for litter control, maintenance
Water Truck(s)	1	1	1	1	2,000 gallons	Dust control, compaction of earth fills, fire fighting support
Maintenance Truck(s)[2]	1	1	1	1	¼ ton	Equipment maintenance
Pumps with Hose	1	1	1	1	2" to 6" diameter pump	Pumping of stormwater
Spray ADC Machine	1	1	1	1	900 gallons	Application of ADC
Light Plant[3]	1	1	1	1	2 – 250 watt fixtures	Adequate lighting at working face
Wind Screens	6	8	10	15	8'x8'	Working face litter control

[1] Number, types, and equipment manufacturers will vary based on operational needs.
[2] As an alternative, the site may contract equipment maintenance with a third party. Under this scenario, maintenance equipment would only be on-site, as needed.
[3] Only needed if site operates during low or no natural light conditions.
[4] The waste volume will be determined by the sum of waste acceptance listed on the previous four TCEQ quarterly summary reports (as required by 30 TAC §330.125(h)).
[5] As an alternate or in conjunction with the articulated dump truck and excavator, a scraper may also be used for excavation and hauling of soil. One scraper will be equivalent to one articulated dump truck and excavator.
[6] If a second MSW working face is in operation, the equipment requirements for the working face will match the waste volume that is disposed of at the other working face. However, other than the compactor or dozer, most of the equipment may be shared between working face (e.g., motor grader, pickup truck, water truck, maintenance truck, etc.)
[7] As noted in Section 4.20.5, a separate area will be used for disposal of Regulated Asbestos-Containing Material (RACM). Equipment needs for this area include a dozer and water truck (or water from an above ground storage tank) which will be used on a part-time basis.
[8] If the Class 1 non-hazardous industrial waste working face is in operation, a dozer will be located at the working face to place and compact the waste.
[9] Equipment needs for the Liquid Waste Bulking Facility are discussed in the Appendix IVC. Limited equipment is needed for the Citizens Convenience Center. The on-site water truck will be used to wash down the Convenience Center area, as needed. Roll-off containers will be emptied by using collection vehicles.

Compactors will be used for spreading and compacting the refuse. An excavator and hauling trucks (or scraper) will be used for various purposes at the Itasca Landfill, including excavating the cover material used in site operations and fire fighting support. The dozer is used mainly to spread waste at the working face, spread cover material, and assist with waste compaction. The motorgrader will be used for activities such as road maintenance, ditch construction, surface water control, and final grading of the completed fill areas. The water truck(s) will be used for dust control and moisture conditioning of soil materials, as necessary, and will be utilized, if necessary, in the event of a fire at the facility. The water truck(s) will be equipped with appropriate equipment to facilitate fire fighting. The windscreens and temporary litter fencing will be used to control windblown waste and litter as discussed in Section 4.5. The maintenance truck is used to provide service to the other site operating vehicles. In addition to the above, miscellaneous pick-ups, vans, and other light utility vehicles as well as instruments and safety and training equipment will be on-site as necessary to assist with site operations.

For information relating to methane monitoring at the Itasca Landfill, see the Landfill Gas Management Plan. For information relating to leachate monitoring, and the control of contaminated water, see the Leachate and Contaminated Water Management Plan. Equipment needed for the application of ADC is discussed in Appendix IVB. Other miscellaneous equipment will be required for the maintenance of the machinery and other duties. This equipment will be kept on site and will include a compressor, power equipment, and tools.

4 OPERATIONAL PROCEDURES

4.1 Access Control

Public access to the waste fill area is controlled by the entrance facilities, which house the Scale Operators, located in the northeast portion of the facility. The Scale Operators control access and monitor vehicles entering and exiting the site. Outside the facility operating hours, the gate to the site will be locked to prevent unauthorized vehicle access.

4.1.1 Site Security

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, and to prevent disruption of facility operations caused by unauthorized site entry.

Unauthorized entry into the site is minimized by controlling access to the landfill site with the perimeter fence and gated entrances (main access entrance and construction vehicle entrance). An existing perimeter fence is located along the permit boundary on the perimeter of the site. The perimeter fence and gates will be inspected every week. Repairs and maintenance will be performed as necessary. Refer to Section 4.24 of this SOP for site inspection and maintenance schedule.

In the event of a breach of the access controls (i.e., a portion of a fence is impacted in a way that it no longer prevents access to the site), the TCEQ Regional Office will be notified within 24 hours of detection of the breach. The breached area will be temporarily repaired within 24 hours of detection and will be permanently repaired by the time specified to the TCEQ Regional Office when it was reported in the initial breach report. In this case, the TCEQ Regional Office will also be notified when the permanent repair is completed. If a permanent repair can be made within 8 hours of detection, no notification to the TCEQ Regional Office is required. Temporary repairs may consist of a barbed wire fence, a 3-foot high earthen berm, equipment, or a security guard posted in the area of the breach.

Entry to the active portion of the site will be restricted to designated personnel, approved waste haulers, and properly identified persons whose entry is authorized by Itasca Landfill management. Visitors will be allowed on the active area only when accompanied by a site representative (note that third party contractors completing construction or monitoring activities will not be considered visitors for the purpose of access control). As noted in Section 2.2, site personnel will be trained to identify what personnel are authorized to enter the site. For example, third party contractors, other personnel

completing site maintenance activities, and visitors are required to complete the site's check-in procedure at the entrance facilities prior to accessing the site. The check-in procedure consist of signing the site access log book which requires the third party to identify themselves and state the purpose for needing access to the site. A phone number, address, date, and time of check-in are also required.

4.1.2 Traffic Control

Itasca Landfill is located at 2559 FM 66, east of the City of Itasca, approximately 2 miles northeast of the intersection of FM 66 and IH 35W in Hill County, Texas.

Solid waste transportation vehicles will be directed to appropriate unloading areas by signs located along the landfill access road. These vehicles will deposit their loads and depart the site. No private or commercial solid waste vehicles will be allowed access to any areas other than the active portion of the landfill. Site personnel will provide traffic directions as necessary to facilitate safe movement of vehicles.

Within the site, signs will be placed along the landfill access road, beginning at the gated entrance, at a frequency adequate for users to be able to understand where unloading areas are located and which roads are to be used for ingress and egress. Roads not being used for access to unloading areas may be blocked or otherwise marked for no entry.

4.2 Unloading Wastes

4.2.1 Unloading Areas

The Itasca Landfill accepts general municipal solid wastes as well as brush, rubbish, construction/demolition waste, non-hazardous industrial solid waste, and certain special wastes outlined in Section 4.20 of this SOP. Wastes are disposed of or processed at the following five locations.

- MSW Unloading Area or Working Face. The majority of all wastes accepted at this facility are disposed of at the MSW working face. The MSW working face includes areas where waste has been deposited for disposal but has not been covered with soil.
- Class 1 Non-hazardous Industrial Waste Unloading Area or Class 1 Working Face. This working face will accept Class 1 non-hazardous industrial waste. The Class 1 working face includes areas where waste has been deposited for disposal but has not been covered with soil.
- RACM Unloading and Disposal Area. The RACM unloading area will be designated by the Landfill Manager or his designee as noted in Section 4.20.5.
- Citizen Convenience Center. This unloading area is used by the general public (i.e., small-vehicle landfill customers) to dispose of their waste in an area separate from the MSW working face. This improves site safety by reducing traffic at the

MSW working face. The Citizen Convenience Center uses watertight containers and is located over a paved area. Waste material is off-loaded from the small-vehicles to roll-off containers. The size of the roll-off containers will range between 20 and 40 cubic yards. The site then hauls the roll-off containers periodically (at least at the end of each day the site is open) to the MSW working face for disposal. The Citizen Convenience Center will not accept sharps. Refer to Parts I/II, Section 3.7 and Parts I/II, Appendix I/IIA for more information.

- Liquid Waste Bulking Facility. The liquid waste bulking facility will accept liquid wastes as outlined in Appendix IVC.

As discussed in Section 4.20.7.6, the Class 1 working face and the MSW working face] may be combined in areas constructed in accordance with the requirements listed in Title 30 TAC §330.331(e) – refer to Part III, Appendix IIIA-C. As discussed in Section 4.20.7.2, all Class 1 waste will be evaluated before acceptance under the site's Class 1 waste evaluation and acceptance procedures. In addition, the delivery/unloading of the Class 1 waste will be performed by authorized Class 1 transporters.

4.2.2 Waste Excluded from Disposal at the Site

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

- Regulated hazardous wastes (refer to Section 6 for more information)
- Liquid wastes that do not pass the paint filter test, except as allowed under Section 4.20.1 of this SOP
- Waste classified as hazardous by the TCEQ (refer to Section 6 for more information)
- Waste prohibited by the TCEQ (see 30 TAC §330.15(e))

4.2.3 Waste Unloading Procedures

Scale Operators, Equipment Operators, Laborers and Spotters will monitor the incoming waste and direct vehicles to the appropriate disposal area. If a Spotter is not present at an unloading area, then the Equipment Operators at the unloading area will assume the Spotter's duties. Equipment Operators will visually inspect the waste material as it is being unloaded and processed from the cab of the equipment they are in (typically a compactor or dozer). Scale Operators control site access and monitor incoming vehicles for unauthorized wastes by (1) receiving manifests and other shipping documents, (2) recording incoming waste loads, (3) completing a visual inspection of the vehicle (including a video camera inspection of the top of the vehicle's contents), and (4) interviewing the driver, as necessary. Any nonconforming issues will be reported to the Landfill Manager or his designee. The Landfill Manager or his designee will work with the Scale Operators and other company resources (e.g., Special Waste Liaison/Compliance Coordinator or the Environmental Manager) to resolve any non-conforming issues. If the non-conforming issues involve Special or Industrial waste, the Landfill Manager or his designee, and Scale Operators will review Sections 4.20 and 6.2

of 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 6.2.

Laborers and Spotters, Equipment Operators, or other field personnel will be present at the working face(s) at all times to monitor incoming loads 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 (refer to Section 2.2 for training procedures). The personnel will also be trained in and have a basic understanding of both industrial and hazardous waste and their transportation and disposal requirements. Site personnel will establish unloading positions at the working face. The unloading positions are basically equally spaced lanes that each collection vehicle uses to unload waste material from the collection vehicle to the working face. Typically, each lane is about 20 feet wide to allow sufficient space between vehicles to allow the safe unloading of waste at the working face (refer to Section 4.20.7.6 for additional information pertaining to when Class 1 waste and MSW are disposed of at the same working face in the Class 1 disposal area).

The personnel will also be trained and have a basic understanding of both industrial and hazardous waste and their transportation and disposal requirements. The Scale Operators, Laborers, Spotters and Equipment Operators have the authority and responsibility to reject unauthorized loads, have unauthorized material removed by the transporter, and/or assess surcharges, and 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 Manager or his designee, General Manager, or Environmental Manager immediately. The Landfill Manager or his designee, General Manager, or Environmental Manager will verify that the appropriate action is taken. In addition, if the unauthorized load is discovered at the site entrance, the Scale Operator will notify the Landfill Manager or his designee, General Manager, or Environmental Manager 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 6.2 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 Laborers, 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, the Laborer, Spotter, or Equipment Operator will notify the Landfill Manager or his designee and the waste load will be promptly relocated to the authorized working face area.

4.2.4 Maximum Size of the Unloading Areas

As discussed previously, the following five unloading areas exist at the Itasca Landfill.

- MSW Unloading Area or Working Face
- Class 1 Non-hazardous Industrial Waste Unloading Area or Class 1 Working Face
- RACM Unloading and Disposal Area
- Citizen Convenience Center
- Liquid Waste Bulking Facility

The MSW and Class 1 unloading and working face areas are discussed below. The RACM unloading and disposal area is discussed in Section 4.20.5 (maximum size 50 feet by 50 feet). The maximum size of the Citizen Convenience Center is 100 feet x 200 feet. The Liquid Waste Bulking Facility is discussed in Appendix IVC (maximum size of this facility is 400 feet by 500 feet).

Control(s) will also be used to confine the MSW and Class 1 working faces to as small an area as practical consistent with the rate of incoming waste and safe and efficient working face operations. The maximum size of the working face will be limited to the area listed below for a range of waste accepted at the facility.

Maximum MSW and Class 1 Working Face Size[1,5]

Incoming Waste[2] Accepted	Maximum Working Face Size[3, 4, 6, 7] (width by length)
0 – 1,500 Tons/Day	150 feet by 175 feet (26,250 sf)
1,500 – 3,000 Tons/Day	250 feet by 325 feet (81,250 sf)
3,000 – 6,000 Tons/Day	375 feet by 450 feet (168,750 sf)
6,000 – 10,000 Tons/Day	525 feet by 600 feet (315,000 sf)

[1] Typically only 1-MSW working face and 1-Class 1 working face will be utilized. Note that the maximum working face size listed above is for each individual working face at the site. However, a third working face may be used in some cases (e.g., during a time when the working face is transitioned to a new cell). The maximum number of working faces to be used at the site is three. Additional equipment will be brought to the site if two MSW working faces are in operation (e.g., 1-compactor, 1-dozer, additional wind screens will be used for the second working face).

[2] For the maximum working face size, the incoming waste tonnage accepted will be determined by the sum of MSW and Class 1 waste acceptance listed on the previous four TCEQ quarterly summary reports.

[3] The working face maximum size listed above is based on the maximum area needed to spread and compact waste in uniform lifts. The MSW working face does not include areas used to move waste from a MSW Tipper to the working face.

[4] The width and length shown above is for guidance purposes only. The maximum working face size will be governed by the area listed above.

[5] If the Class 1 non-hazardous industrial waste working face is in operation, a dozer will be located at the working face to place and compact the waste. Additional equipment will be brought to the site if two Class 1 working faces are in operation (e.g., an additional dozer).

[6] During the placement of the first lift of MSW in a newly constructed cell, the maximum working face size listed above does not apply provided that odors, vectors, and windblown litter are controlled consistent with standard operating conditions.

[7] The maximum working face size listed above does not apply to areas that have less than a six-foot thick waste column left before the final permitted grades are achieved provided that odors, vectors, and windblown waste are controlled consistent with standard operating conditions.

The working face(s) includes areas where waste has been deposited for disposal but has not been covered with daily or intermediate cover. The working face(s) includes areas that are covered with Alternative Daily Cover and the area where waste collection vehicles deposit waste onto the working face. As discussed in Part III, Appendix IIIC – Leachate and Contaminated Water Management Plan, the working face area is surrounded by a contaminated water containment berm and stormwater diversion berm. The area within the containment and diversion berms includes the following.

- Working Face Area (as defined above)
- Waste Collection Vehicle Access Area (area where waste collection vehicles access the working face)
- Contaminated Water Storage Area (as noted in Part III – Appendix IIIC, this area is designed to contain stormwater that has contacted the working face)

Note that the waste collection vehicle access area and contaminated water storage area will be covered with soil daily cover. A portion of this area will be covered by aggregate used to ensure all-weather access to the working face.

4.2.5 Prohibited Wastes

Prohibited waste that is not discovered until after it is unloaded shall be immediately returned to the vehicle that delivered the waste. That party shall be responsible for the proper disposal of this rejected waste at a permitted facility. In the event the unauthorized waste is not discovered until after the vehicle that delivered it is gone, the waste shall be segregated and controlled to the extent possible. The unauthorized waste will be covered with soil or ADC and no additional filling will occur over that area until the unauthorized waste is removed and disposed of properly. Survey stakes or similar markings will be placed around the perimeter of the area that contains the unauthorized waste so that it is clear where the unauthorized waste is located. Alternatively, the unauthorized waste may be segregated by placing the unauthorized waste in a roll-off or similar container.

An effort shall be made first to identify the entity that deposited the prohibited waste and have them return to the site and properly dispose of the waste. In the event that identification is not possible, Itasca Landfill will notify the TCEQ within 24 hours to seek guidance on how properly to dispose of the waste as soon as practical. A record of each unauthorized material removal event will be maintained in the Site Operating Record.

Signs with directional arrows and portable traffic barricades will help to restrict traffic to designated unloading areas. Signs will be placed along the access route to the current unloading areas. In addition, rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance. Refer to Section 6 of this SOP for additional waste handling procedures.

Tires will only be accepted for disposal if they are split, quartered, or shredded.

4.2.6 Radioactive Material Detection Procedures

Automated radiation detection equipment is used to allow the detection of any radioactive compounds. The detection equipment will be utilized at each incoming scale except during routine calibration, maintenance, or during repair periods of the detection equipment. Detection of a radioactive material will sound an alarm in the scale house.

Upon sounding of the alarm, the following procedures will be followed:

- The detector will be reset and the vehicle will be required to drive past the detector again to verify the detection.
- If the alarm is sounded a second time, the driver will be instructed to move the vehicle off the scale and park the vehicle in a designated area. No materials are to be removed from the vehicle, nor will any person be allowed to sort through the waste.
- The driver will be monitored separately from the vehicle to verify that the driver has not set off the alarm. If the driver does not set off the alarm, the load is considered suspect. The Landfill Manager or his designee or his designee will direct efforts to identify the waste triggering the alarm.

If the radiation alarm is determined to have been activated by regulated radioactive waste material, this material cannot be accepted for disposal.

4.3 Hours of Operation

The Itasca Landfill will have the option to operate and accept waste 24 hours per day, seven days per week. However, hours of operation and waste acceptance may vary within a 24-hour period depending on incoming volumes of waste. A record of the actual operating and waste acceptance hours will be maintained in the Site Operating Record. The operating and waste acceptance hours will be posted on the site entrance sign. If the posted landfill hours are less than 24 hours a day, transportation of materials and heavy equipment operation can occur at any time (24 hours per day, seven days per week – this includes all construction-related activities).

The option to operate the site and accept waste at the site 24 hours per day, seven days per week will ensure that the site has the ability to provide solid waste disposal services for the surrounding area. The landfill serves a variety of areas that have long haul distances to the landfill and urban areas that have specific waste collection requirements (e.g., early morning collection so as to minimize area traffic impacts). An extended-hour operation will ensure that these areas have access to the landfill.

4.4 Site Signs

A sufficient number of signs that are readily visible will be utilized for proper management and operation of the Itasca Landfill. A sign will be displayed at the entrance to the site. This sign will be readable from the site entrance, will measure at least 4 feet by 4 feet, and have lettering of at least 3 inches in height that state the name of the site, type of site, hours and days of waste acceptance, the TCEQ permit number, and local emergency fire department phone number. The sign displayed at the site entrance will also list an emergency 24-hour contact phone number(s) that reach an individual with the authority to obligate the facility at all times that the facility is closed. The Landfill Manager or his designee will be responsible for the accuracy of the information posted on the site sign. An additional sign will be posted containing a description of all excluded wastes. Signs prohibiting smoking will be posted near the Scale House.

Within the site, signs will be placed along the landfill access road, beginning at the gated entrance, at a frequency adequate for users to be able to understand where disposal areas are and which roads are to be used. Roads not being used for access to the disposal area will be blocked or otherwise marked for no entry.

4.5 Control of Windblown Wastes and Litter

Windblown wastes will be controlled at the Itasca Landfill by the methods listed in Table 4.1.

4.6 Easements and Buffer Zones

4.6.1 Easements

A Files Valley Water Supply Corp. water line easement is located on the east side of the property and is offset approximately 50 feet west of the east property line. Two additional easements (Files Valley Water Supply Corp. and Hill County Blackland SWCD) are listed on Drawing I/IIA.1 in Appendix I/IIA. No solid waste unloading, storage, disposal, or processing operations will occur within any easement, buffer zone, or right-of-way at the Itasca Landfill. Also, no waste disposal is allowed within 25 feet of the centerline of a utility line or pipeline easement. Easements are or will be marked as specified in Section 4.7 of this SOP.

4.6.2 Buffer Zones

The buffer zone for the fill area is generally located between the permit boundary and the buffer zone boundary (typically 50 feet). No solid waste unloading, storage, disposal, or processing operations will occur within any buffer zone at the Itasca Landfill. In accordance with Title 30 TAC §330.543(b)(2)(B) and (C), the buffer zones vary around the perimeter of the site, but in no case are they less than 50 feet between the permit

boundary and existing waste (the limit of waste permitted as part of MSW Permit No. 241C), inactive PST Bioremediation Facility, Liquid Waste Bulking Facility, Citizens Convenience Center, or the existing and proposed leachate tanks, and 125 feet from the newly permitted limit of waste (refer to Parts I/II, Appendix I/IIC – Location Restriction Demonstration, Section 2 and Drawing I/IIC-1 for more information). Additionally, internal separation distances between processing and disposal units are shown in Appendix I/IIC, Drawing I/IIC-1A. The buffer zones around the site will provide for the safe passage of fire fighting or other emergency vehicles. All buffer zones will be clearly marked as specified in Section 4.7 of this SOP.

Table 4.1
Windblown Waste and Litter Control Plan

Item	Plan
Containment of Waste Within Collection Vehicle	Waste transportation vehicles using this facility will be encouraged to use adequate covers or other means of containment. The adequacy of covers or containment of incoming wastes will be checked at the facility entrance. The Scale Operators will visually inspect each vehicle entering the site to verify that the load is secured. A sign will be posted at the entrance indicating that vehicles shall be covered (or secured) or an additional fee will be charged. Vehicles attempting to enter the site with unsecured loads will be documented and the list can be provided to law enforcement officials, if necessary. An additional surcharge fee will be demanded from unsecured vehicles.
Daily Cover	Daily cover (e.g., soil or ADC) will be applied at least once every 24 hours to assist with the control of windblown waste. The working face size may be reduced by the application of daily cover to assist with the control of windblown waste.
Portable Fencing	Portable fencing will be used for the confinement of windblown material in the areas adjacent to the working face area. Such fences shall be located along the downwind length of the working face area. The litter control fences will be constructed of screens attached to portable frames or other appropriate anchor methods. The litter control fence will be at least eight feet in height and will be located as close as practical to the working face area to control windblown waste and litter. Each day, the Landfill Manager or his designee or his designee will review weather forecasts to verify that the litter control fences will be positioned downwind from the MSW working face.
Temporary Fencing	Temporary fencing may also be installed on the downwind side of the working face. The purpose of the temporary fencing is to catch windblown waste that escapes the portable fencing discussed above. The temporary fence will either consist of additional portable fencing described above or will be constructed using metal or wooden posts and fence material, or netting. The secondary fence shall have a minimum height of four feet and a minimum length of at least 175 feet (or match the maximum length of the working face as noted in the table in Section 4.2.). The Landfill Manager or his designee, or designee, shall determine the appropriate fence location and actual length. Additional fences may be used as necessary for effective litter control based on the actual filling location, filling direction, wind direction, and wind speed. Any litter control fencing which is damaged by equipment or traffic shall promptly be repaired or replaced.
Perimeter Fencing	Tall perimeter fencing may also be used for the control of windblown waste and litter. Tall perimeter fencing may be installed between any waste filling area and the permit boundary. The tall perimeter fence will typically be at least ten feet in height. The actual length and height of the perimeter fencing used will be determined by the Landfill Manager or his designee or his designee, based on the need for this additional litter control measure, filling location, average wind direction, average wind speed, height of fill above natural ground surface, and proximity of working face to the permit boundary.
Earthen Berms	The construction of earthen berms may be used for the control of windblown waste and litter. The berms can provide a wind break against prevailing winds. It is at the Site Operators discretion as to the locations and usage of the berms.
Windblown Waste Collection	As part of the overall site maintenance program, facility personnel will collect windblown waste materials that may have accumulated throughout the site, on fences and gates, and onsite access roads a minimum of once a day that the site is in operation. Such waste will be taken to and disposed of at the working face. The collection of windblown waste will be an ongoing activity at the site each day the site is in operation, including the Citizens Convenience Center area. The inspection and clean up of wind blown waste will be documented in the Site Operating Record daily.
Class 1 Working Face	The Class 1 working face may be located below or above-grade and the wastes accepted in this area are typically not subject to the creation of windblown waste (e.g., petroleum contaminated soil and solidified industrial sludges). Therefore, windblown waste in this area is typically not an issue. However, if it is determined that windblown waste is created in this area then a combination of the methods noted above will be used to control windblown waste.
RACM Area	As noted in Section 4.20.5, RACM wastes will be covered immediately after they are placed in the landfill unit. Therefore, windblown waste in this area is not an issue.
Liquid Waste Bulking Facility	The wastes in the Liquid Waste Bulking Facility are also not subject to wind, given that the material is handled within a building.

4.7 Landfill Markers and Benchmark

Landfill markers will be installed to clearly mark significant features as described in §330.143(b). The markers will be steel (with plastic identification sleeves), wooden posts, or plastic (or other TCEQ approved material) and will extend at least 6 feet above the ground surface. The markers will not be obscured by vegetation and will be placed in sufficient numbers to clearly show the required boundaries. Markers will be installed with an offset where markers otherwise would not be visible. Markers that are removed or destroyed will be replaced within 15 days of their removal or destruction. Landfill markers will be inspected monthly to ensure they are installed and maintained in accordance with the requirements of this SOP and will be maintained and repaired as necessary. Refer to Section 4.24 of this SOP for site inspection and maintenance schedule. Inspection results and repairs will be documented in the Site Operating Record. Markers will be repainted as needed to retain visibility.

The landfill marker color scheme is listed below.

Landfill Markers

Marker	Color
Site Boundary	Black
Buffer Zone	Yellow
Easements and Rights-of-Way	Green
Grid System	White
SLER/GLER	Red
Floodplain	Blue

Facility boundary markers will be placed at each corner of the facility and along each boundary line at intervals no greater than 300 feet. Fencing will be placed within these markers as required. Markers identifying the buffer zones will be placed along the buffer zone boundary at all corners and between corners at intervals no greater than 300 feet.

The easement and rights-of-way markers will be placed along the centerline of an easement and along the boundary of rights-of-way at each corner within the site and at the intersection of the site boundary. The easement and rights-of-way markers will also be placed at intervals no greater than 300 feet along the centerline of the easement or rights-of-way.

The current site coordinate based grid system will be used as shown on the Site Layout Plans. The grid system markers will be spaced no greater than 100 feet apart measured along perpendicular lines. Intermediate markers will be installed in the case where markers cannot be seen from opposite boundaries. The grid system markers will be maintained during the active life of the site.

The SLER/GLER markers will be placed so that all areas for which a SLER/GLER has been submitted and approved the TCEQ are readily determinable. Such markers are to provide site workers immediate knowledge of the extent of approved disposal areas.

These markers will be located so that they are not destroyed during operations until operations extend into the next SLER/GLER. The location of these markers will be tied into the landfill grid system. SLER/GLER markers will not be placed inside the evaluated areas.

Flood protection markers will be installed for areas within the facility that are within the 100-year floodplain. The area subject to flooding will be clearly marked by means of permanent posts not more than 300 feet apart or closer if necessary to retain visual continuity.

A permanent benchmark has been established at the site, as shown in Parts I/II, Appendix I/IIA, Drawing I/IIA.1 – General Site Plan, in an area that is readily accessible and will not be used for disposal. The benchmark is a bronze survey marker located on the southeast corner (Latitude: N 32° 10′ 49.8″ and Longitude W 97 ° 06′ 35.6″) of the site near FM 66 and is stamped with elevation and survey date and set in concrete.

4.8 Control of Waste Spilled on Route to the Site

The Landfill Manager or his designee or his designee will take steps to encourage that vehicles hauling waste to the working face or other unloading areas arrive on-site with a tarpaulin, net, or other means to properly secure the load. As discussed in Section 4.5, waste transportation vehicles using this facility will be required to use adequate covers or other means of containment. The adequacy of covers or containment of incoming wastes will be checked at the facility entrance. The Scale House Attendant will visually inspect each vehicle entering the site to verify that the load is secured. A sign will be posted at the entrance indicating that vehicles shall be covered (or secured) or an additional fee will be charged. Vehicles attempting to enter the site with unsecured loads will be documented and the list can be provided to law enforcement officials, if necessary. An additional fee will be demanded from unsecured vehicles.

The Landfill Manager or his designee will be responsible for the cleanup of waste materials spilled (e.g., solid waste material that has left the vehicle) along and within the rights-of-way of all public access roads serving the site for a distance of two miles in either direction from the entrance to the site. Cleanup for the spilled solid waste materials will be performed once per day that the site is in operation. The access roads within a distance of two miles in either direction from the site entrance are FM 66 and the IH-35W entrance and exit ramps. Laborers performing litter and spilled solid waste materials collection will be required to wear appropriate safety equipment. A log shall be maintained to document the date and time the roads are checked and whether litter was observed and when it was collected.

The Landfill Manager or his designee will consult with TxDOT officials (or other applicable local agencies) with maintenance authority over the roads concerning cleanup of highways and rights-of-ways 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 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 rights-of-way for litter cleanup, this documentation will also be maintained in the Site Operating Record.

4.9 Disposal of Large Items

Large, heavy, or bulky items will be disposed of at the working face (i.e., their ultimate fate will be disposal in the landfill, not recycled). Items that can be classified as large, heavy, or bulky can include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, and automobiles. If the Scale Operators or the Landfill Manager or his designee does not believe a specific large, heavy, or bulky item can be incorporated into the working face without adversely disrupting site operations or that it might cause an issue with compaction or settlement, then the item will not be accepted for disposal. Refrigerators, freezers, air conditioning units, or other items containing chlorinated fluorocarbon (CFC) refrigerant shall be handled in accordance with 40 CFR §82.156(f), as amended. Items containing CFCs will not be accepted unless the CFC contained in the item has been captured and sent to an approved CFC disposal site or recycling facility and the generator or transporter provides written certification that the CFC has been evacuated from the unit. Items such as electrical equipment, which contains prohibited PCBs, will be excluded from waste fill. Procedures for detecting and excluding prohibited PCBs are provided in Section 6.

Large items will be reduced in size at the working face to the extent practical. Care will be taken during disposal of large items to ensure that: (1) large items are excluded from the initial 5 feet of waste placed over the liner system, (2) large items are placed so that they do not interfere with continued waste filling, and (3) that other, smaller municipal solid waste is placed and compacted around them. Large items that cannot be disposed of at the working face may either be recycled or disposed of in another permitted facility.

4.10 Air Quality and Odor Management Plan

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.

Steps will be taken to limit the impact of the facility's operation on air quality. Among the measures to be employed are the following:

- Accidental fires will be controlled as outlined in Section 7 of this SOP.
- Open burning of waste will not be permitted at this facility.
- Incoming waste will be promptly compacted into the active face area. Daily cover will be placed consistent with the procedures specified in Section 4.18.2.

- Ponded water at the site will be controlled as detailed in Section 4.19 of this SOP.
- The Gas Collection and Control System (GCCS) will be expanded and operated in accordance with all applicable requirements.
- As discussed in Section 4.12, the landfill haul roads and access roads will be maintained in a reasonable dust-free condition by periodic spraying from a water truck. During dry weather conditions, the Landfill Manager or his designee or his designee will routinely inspect the site and establish a frequency, if necessary, to spray the access roads with water to prevent nuisance conditions from developing.

The site management team (e.g., Landfill Manager or his designee, Environmental Manager, and General Manager) will verify that Itasca Landfill does not violate any applicable air quality and/or LFG requirements (refer to the Landfill Gas Management Plan for more information). The Environmental Manager is responsible for verifying and documenting compliance with the site's operating permit and any other applicable regulations. Current permits will be maintained in the Site Operating Record.

The site management team will maintain the required probe monitoring data and GCCS records as described in the Landfill Gas Management Plan.

Odors shall be controlled at the site and will be reduced if they occur in accordance with this Odor Management Plan. Sources of landfill odor can vary considerably and may include the wastes being delivered to the landfill; the open MSW and Class 1 waste working face area; surface emissions from the covered portion of the landfill; the landfill gas collection and control system (GCCS); the leachate collection system; the Citizen Convenience Center; or the Liquid Waste Bulking Facility. Many of the wastes received at a landfill are a source of odor upon receipt. Examples of these wastes include the following:

- Dead animals
- Sludges
- Waste material handled at the Liquid Waste Bulking Facility (e.g., grease trap waste, grit trap waste, and non-hazardous industrial wastes – refer to Appendix IVC for more information)

Other wastes have the potential for becoming a source of odor by their biodegradable characteristics, generating gases as they advance through the decomposition process. The generation of LFG within the landfill is one of the primary sources of odor. To address potential LFG odors, the Itasca Landfill has installed and operates a LFG collection and control system (GCCS). One of the primary objectives of this system is to remove the LFG from within the landfill before it can percolate to the landfill surface and enter the atmosphere. The LFG that is recovered from within the landfill is conveyed to a flare to be thermally destroyed. As landfill operations progress the GCCS has been, and will continue to be, expanded as necessary. Leachate may also be a source of odor if not properly handled or disposed of in a timely manner.

Among the measures that may be employed to reduce potential odors are the following.

- Minimize the size of the working face area.
- Increase the thickness of daily cover applied to the working face.
- Prevent ponded water, consistent with the procedures outlined in Section 4.19.
- Place daily and intermediate cover to the specified thickness over the fill area. The Landfill Manager or his designee, or his designee, will visually inspect daily and intermediate cover areas to confirm that no trash is exposed and no significant erosion of cover material has occurred. Erosion rills located on daily cover, intermediate cover, or final cover areas will be promptly repaired (more information in Section 4.18).
- Assess the effectiveness of the existing LFG extraction system and make all necessary repairs to the system or expand the system, as needed, to control odors.
- Identify any waste stream that requires special attention to control odor. If the Scale Operators note 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. The site may also schedule the delivery of known odorous wastes. This will allow site personnel to be prepared for the prompt handling of this material. The site may also schedule the delivery of known odorous wastes. This will allow site personnel to be prepared for the prompt handling of this material. The site may also sequence the unloading of known odorous wastes at the working face. For example, covered trucks transporting sludge may be instructed to wait at a specified location within the site until there is minimal traffic or no other sludge trucks at the working face. The site will then sequence the unloading of the sludge truck so that the working face personnel can promptly handle (and cover) this material at the working face.
- Inspect the leachate collection and storage system to confirm that it is functioning as designed (e.g., inspect piping, including the leachate riser and related fittings, and storage tank system to verify no leaks have occurred). Vapor tight gaskets will be used on leachate risers if odor issues are identified at the risers.
- Inspect and evaluate leachate recirculation procedures. Leachate recirculation will be temporarily suspended if the odor issue is a result of recirculation activities. Leachate recirculation procedures will be evaluated to determine the cause of the odors and to mitigate the odor issue before the leachate recirculation activities are resumed.
- Removal of leachate from the site should be performed under appropriate weather conditions.
- Inspect the Liquid Waste Bulking Facility and Citizen Convenience Center to verify that odors are controlled. If odors become an issue in these areas, the stored material will be systematically removed until the odors are eliminated.

- Evaluate the possible use of misters and chemical deodorizers when other controls do not reduce or eliminate significant odors. In the event that it is determined that misters or deodorizers will help minimize odors, a permit modification will be submitted to TCEQ for approval.

The Landfill Manager or his designee or his designee will 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.

4.11 Disease Vector Control

Itasca Landfill 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 in accordance with Section 4.17. Daily cover and/or ADC will be applied at the end of each operating day in accordance with Section 4.18.2. A schedule of inspections is provided in Section 4.24 (refer to daily cover item).

Documentation of these inspections will be maintained in the Site Operating Record. If site inspections identify the need for additional vector controls, the site will implement a control program by contracting with a licensed commercial pesticide applicator, or other qualified pest control specialist to perform the following services:

1. Develop a pest management program for the vectors identified.
2. Implement the additional vector management practices.
3. Assist in the development of vector specific awareness training materials for site personnel.
4. Assist the site in distributing these training materials and providing any necessary training activities on vector awareness and control for site personnel.

The site will implement a bird abatement program that incorporates the use of pyrotechnic devices or an alternative bird abatement program to control birds at the working face area.

4.12 Maintenance of Site Access

The Itasca Landfill has an existing paved entrance road. In addition, the landfill haul roads and access roads are constructed with a 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). The paved entrance road and crushed-stone internal roads provide mud control for the waste hauling vehicles prior to exiting the site and returning to public access roads. During wet weather conditions, the Landfill Manager or his designee or his designee will routinely inspect the site and implement measures to further minimize mud tracking onto public access roads, as necessary (e.g., temporary wheel washing procedures).

The landfill haul roads and access roads will be maintained in a reasonable dust-free condition by periodic spraying from a water truck. During dry weather conditions, the Landfill Manager or his designee or his designee will routinely inspect the site and establish a frequency, if necessary, to spray the access roads with water to prevent nuisance conditions from developing. Litter and other debris along the landfill haul and access roads will be removed, consistent with the schedule requirements listed in Section 4.24 of this SOP (i.e., litter or other debris will be picked-up on a daily basis). Grading equipment will be used as necessary to control or remove mud accumulations on roads as well as minimize depressions, ruts, and potholes. In addition, all on-site and other access roadways will be maintained on a regular basis. Mud and assorted debris tracked onto public roadways will be removed at least once per day on days when mud and associated debris are being tracked onto public roadways to the extent that mud can be reasonably considered to be associated with landfill operations. Refer to Section 4.24 of this SOP for site inspection and maintenance list (this list also includes documentation requirements which are also explained in Section 9).

4.13 Salvaging and Scavenging

For purposes of this SOP, salvaging is the removal of waste materials from the working face or waste hauling vehicles at the entrance for reuse or recycling. Salvaging will be prohibited at all times. Various site personnel (e.g., equipment operators and spotters) will guard against salvaging and scavenging activities. Scavenging is the uncontrolled and unauthorized removal of materials at any point in the solid waste management system, including but not limited to the removal of waste deposited at the working face or active disposal area. Scavenging will be prohibited at all times.

4.14 Endangered Species

Information regarding endangered species is located in Parts I/II, Section 12, in accordance with §330.61(n) and §330.551. No endangered or threatened species have been documented at the site nor has a critical habitat for such species been identified at the site. Neither the facility nor its operation will result in the destruction or adverse modification of the critical habitat of endangered or threatened species or cause or contribute to the taking of endangered or threatened species. If endangered or threatened species are encountered during site operations, Texas Parks and Wildlife and U.S. Fish and Wildlife will be notified.

To prevent potential impacts to migratory birds, land-clearing activities in riparian areas will be conducted outside of the primary nesting season (March 1 to August 1). If clearing during the nesting season is necessary, a field investigation by a qualified biologist will be conducted to locate any active nests within the area to be cleared. If an active nest is found, avoidance of this nest and a buffer of at least 100 feet will be respected until nesting is completed. Documentation of the field investigation will be maintained in the Site Operating Record.

4.15 Control of Landfill Gas

The control and monitoring of landfill gas for the proposed Itasca Landfill will be in accordance with the Landfill Gas Management Plan. The Landfill Gas Management Plan was developed in accordance with §330.371 and provides for required reports and other submittals to be included in the Site Operating Record and submitted to the Executive Director (refer to Section 4.10 for additional information).

As noted in the Landfill Gas (LFG) Management Plan, monitoring for the presence of methane gas at the site will be conducted on a quarterly basis. In particular, the LFG monitoring probes will be monitored for the possibility of subsurface perimeter methane concentrations exceeding the lower explosive limit (LEL). Additionally, on-site structures will be checked to ensure that methane concentrations do not exceed 25 percent of the LEL. The allowable limits and details of gas recovery are more fully described in the Landfill Gas Management Plan.

Monitoring for combustible gas concentrations will be performed quarterly within all site structures and at the LFG monitoring probes. Required reports and other submittals will be included in the Site Operating Record and submitted to the executive director, as necessary.

In the event that methane levels that exceed allowable limits are detected (25% of the LEL for methane in facility structures or 100% of the LEL at LFG monitoring probes), the TCEQ will be notified and steps will be implemented to protect human health, in accordance with the contingency plan presented in the Landfill Gas Management Plan. Documentation of the LFG measurements and of the protective measures implemented will be placed in the Site Operating Record within seven (7) days. A remediation plan for any methane gas exceedances as described in the Landfill Gas Management Plan will be implemented within 60 days of the methane detection. This remediation plan will be submitted to TCEQ to describe the proposed remediation activities.

4.16 Treatment of Oil, Gas, and Water Wells

If an abandoned oil, gas, or water well is located, the Landfill Manager or his designee will provide written notification to the TCEQ's Executive Director of their location within 30 days after discovery during the course of facility development. As the site is

developed, if any wells are encountered, they will be exposed, the casing cut to a minimum of 2 feet below the excavation, and the well capped and plugged in accordance with all applicable rules and regulations of the TCEQ, the Railroad Commission of Texas, or other applicable state agency.

The Landfill Manager or his designee will provide written notification to the Executive Director of the location of any existing or abandoned water wells within the facility upon discovery during site development. Within 30 days of such a discovery, the Landfill Manager or his designee will provide written notification and certification to the Executive Director of the TCEQ that all such wells have been capped, plugged, and closed in accordance with all applicable rules and regulations of the TCEQ or other applicable state agency. If a water well is proposed in the future, a permit modification will be submitted to the TCEQ to meet the requirements of §330.161. Water wells that will be used to supply the facility may remain in use provided they are outside of the monitoring well network and are not affected by landfill operations.

For crude oil or natural gas wells, or other wells associated with mineral recovery that are under the jurisdiction of the Railroad Commission of Texas, within 30 days after the plugging of any such well, the Landfill Manager or his designee will provide the Executive Director of the TCEQ with written certification that all such wells have been properly capped, plugged, and closed in accordance with all applicable rules and regulations of the Railroad Commission of Texas.

A copy of the well plugging report to be submitted to the appropriate state agency will also be submitted to the executive director of the TCEQ within 30 days after the well has been plugged.

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

4.17 Compaction of Solid Waste

Compaction of incoming MSW facilitates efficient use of available space, minimizes settlement and consolidation, and promotes proper application of daily, intermediate, and final cover. A landfill compactor(s) or similar equipment will be used to compact waste at Itasca Landfill. Unless otherwise documented in the Site Operating Record, the Landfill Manager or his designee or his designee will instruct the Equipment Operators to spread waste in lifts that are approximately two feet thick. The compactor will make at least three to four passes to compact the waste. A pass is defined as one direction of travel. The Equipment Operators will be trained to determine whether the compaction equipment is functioning as designed to ensure that the waste lift is adequately compacted. The number of passes required may be increased depending upon the nature of the waste that is being compacted.

To prevent the formation of potentially unstable interim slope conditions, the sequence of fill will be developed in a manner that solid waste will be compacted in horizontal lifts starting from the top of the liner protective cover (typical configuration of the working face area is shown in Part III, Appendix IIIC, Appendix IIIC-C. After obtaining TCEQ approval for each newly constructed liner (i.e., approval of the GLER), the filling operation will start at the bottom of the landfill and continue vertically in horizontal lifts. Under no condition will the maximum allowable interim slopes or slope lengths be exceeded (refer to Appendix IIIE for allowable interim slope lengths) without prior TCEQ authorization.

4.18 Soil Management, Placement, and Compaction of Daily, Intermediate, and Final Cover

4.18.1 Soil Management

Management of soil (or earthen material) for use in and around the landfill area will be an ongoing process at the Itasca Landfill. Soil will be obtained from onsite and offsite soil borrow sources as needed for facility operations. Earthen material for use as daily cover, intermediate cover, final cover, and other uses will be available for the site.

The earthen material will consist of soil that has not previously come in contact with waste and will be of sufficient volume to meet the fire protection requirements specified in Section 7.7. The stockpile will typically be located within the undeveloped, permitted portion of the waste disposal footprint or on the topdeck of the landfill near the unloading areas. The stockpiles will not be located in a buffer zone or located in a manner that will block access of fire and emergency equipment. Also, the stockpile will be located in an area that does not effect drainage structures. As this earthen material is used, it will be replenished as soon as practical but shall at all times be maintained to meet the fire protection requirements specified in Section 7.7. Both the volume of earthen material required to be maintained within 1,000 feet of each working face and the volume of the earthen material on-site to cover each working face with at least a 1 day application of 6 inches of daily cover will be documented on the Cover Application Log (refer to Section 4.18.5 and Section 7.7.4 for an example soil stockpile calculation).

4.18.2 Daily Cover

Daily cover of waste is used to control disease vectors, windblown waste, odors, fires, and scavenging and to promote runoff from the fill area. At least once every 24 hours, the exposed solid waste fill area(s) will be covered by (1) at least 6 inches of earthen material cover material that has not been previously mixed with garbage, rubbish, or other solid waste, or (2) an approved Alternate Daily Cover (ADC) material. As discussed in Section 4.2, the working face includes areas where waste has been deposited for disposal but has not been covered with soil. The working face includes areas that are covered with Alternative Daily Cover and the area where waste collection vehicles deposit waste onto the working face. As discussed in the Leachate and Contaminated Water Management

Plan, the working area is surrounded by a contaminated water containment berm and stormwater diversion berm. The area within the containment and diversion berms includes:

- Working Face Area (as defined above)
- Waste Collection Vehicle Access Area (area where waste collection vehicles access the working face)
- Contaminated Water Storage Area (this area is designed to contain stormwater that has contacted the working face.

ADC information is included in Appendix IVB of this SOP and in the Waste Acceptance Plan, Appendix IVA (e.g., use of petroleum contaminated soils as ADC). The plan addresses the following items.

- Description and thickness 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 MSDS(s) for the ADC

In accordance with §330.171(b), concentration levels of petroleum contaminated soils that will be used as ADC will not exceed 1,500 mg/kg of total petroleum hydrocarbons (TPH) or the constituent concentrations listed in Table 1 of §335.521(a)(1). Additionally, petroleum contaminated soils will not contain regulated PCB wastes and will not exceed constituent limitations imposed on waste authorized to be disposed at the facility.

ADC is used to cover waste that will be filled again within a 24-hour period. ADC is only used in areas that are surrounded by the containment berm. Runoff generated by an area covered with ADC will be managed as contaminated water.

As mentioned above, ADC information is included in Appendix IVB. The remaining portion of this section details the procedures to be used if soil daily cover is utilized. To ensure that the soil daily cover soil will be adequate (i.e., minimize vectors, prevent contaminated storm-water runoff, prevent odors, etc.) the following procedures will be followed:

- The daily cover will be sloped to drain.
- The daily cover will be spread and compacted with a minimum of two passes with the dozer tracks to minimize infiltration of storm water, graded to drain, and will not have any waste visibly protruding through it.
- The Landfill Manager or his designee, or his designee, will document where daily cover has been placed and visually inspect during placement that a minimum of 6 inches (compacted thickness) of daily cover soil has been placed and that no waste is exposed through it. The Landfill Manager or his designee or his designee shall

document, on a daily basis, the daily cover placement area and indicate that he (or his designee) has visually verified the thickness and condition in the Cover Application Log (discussed further in section 4.18.5 of this SOP).

- The Landfill Manager or his designee, or his designee, will inspect all daily cover areas for erosion, exposed waste or other damage, and repair as necessary. Erosion gullies or washed out areas will be repaired within 24 hours after the area is accessible (i.e., after the cover soils dry out enough to allow access by earth-moving equipment without causing excessive rutting of cover soils).
- The Landfill Manager or his designee, or his designee, will inspect for seeps from daily cover. All seepage water from waste below the daily cover will be controlled by placement of soil berms and diverted to a contaminated water collection area. Contaminated water will be treated as outlined in the Leachate and Contaminated Water Management Plan.

Inactive areas with 6 inches of daily cover will be inspected each day the site is in operation for erosion, ponded water, seeps, protruding waste, or other detrimental conditions that may cause contaminated runoff from the daily cover. The Landfill Manager or his designee, or his designee, will place additional cover, as needed, to repair erosion, prevent ponded water and seeps, and cover protruding waste. After a period of 180 days, an additional 6 inches of earthen material not previously mixed with garbage, rubbish or other solid waste will be placed over the daily cover for a total of not less than 12 inches of cover. This 12-inch-thick layer of cover soil will be classified as "intermediate cover" as described in Section 4.18.3 of this SOP. If the area becomes active again, the cover soil may be stripped off for use as daily cover in other areas.

4.18.3 Intermediate Cover

All areas that receive waste and then become inactive for longer than 180 days will be covered with an additional 6 inches of well compacted cover material, for a total cover thickness of at least 12 inches. The intermediate cover will be graded and maintained to prevent ponding. In addition, the top 6 inches of earthen material used for intermediate cover will be suitable for sustaining native plant growth and will be seeded following the placement of intermediate cover soils. Seeding will occur during a standard growing season when it is feasible to establish vegetation. The establishment of vegetation is desirable to reduce erosion, which helps to maintain the cover's integrity, improve the aesthetic appearance of the landfill and aid in sediment control.

The sequence of intermediate cover placement with respect to waste placement is included in detail in Parts I/II, Drawings I/IIA.4 through I/IIA.6. The Landfill Manager or his designee or his designee will inspect intermediate cover at the site on a weekly basis. In addition, intermediate cover will be inspected at the Itasca Landfill within 72 hours of any rainfall event of 0.5 inches or more. Erosion gullies or washed out areas will be repaired within 5 days of detection by restoring the cover material, grading, compacting, and seeding unless the TCEQ 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

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 Landfill Manager or his designee, or his designee, will inspect for seeps from intermediate cover. All seepage water from waste below the intermediate cover will be controlled by placement of soil berms and diverted to a contaminated water collection area. Contaminated water will be treated as outlined in the Leachate and Contaminated Water Management Plan (refer to Section 4.22). These inspection and maintenance procedures are also applicable to the Class 1 containment dikes.

4.18.4 Final Cover

Final cover placement will occur as areas of the site are filled to the design top-of-waste grades. Final cover placement over individual areas will be in accordance with the Final Closure Plan and will permit ongoing landfilling operations to continue until the time of final closure. Surface water will be managed throughout the active life of the site to minimize infiltration into the filled areas and to minimize contact with solid waste. Erosion of final or intermediate cover will be repaired within 5 days after the initial inspection by restoring the cover material, grading, compacting, and seeding unless the TCEQ 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 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, must be documented in the Cover Application Log (refer to Section 4.18.5). Such periodic inspections and restorations are required during the entire operational life and for the postclosure maintenance period. Refer to Section 4.24 of this SOP for a Site Inspection and Maintenance List.

Final cover placement over completed portions of the site will consist of the following steps:

- Survey controls will be implemented to control the filling of solid waste to the bottom level of the final cover system.
- A surveyed grid system on 100-foot centers will be established, or other suitable surveying or plans will be used to control placement of the final cover.
- When the appropriate design landfill height of the proposed final cover is reached, the top of the landfill will be regraded and reshaped as needed.
- During the first growing season following application of the final cover system, the site will be vegetated with appropriate grasses to minimize erosion.
- The surface water management system will be constructed as indicated in the Stormwater Management Plan.

- The final cover system layers will be constructed. Testing of the various components of the final cover system will be performed in accordance with the Final Closure Plan.
- A final cover certification report complete with an as-built survey will be prepared by an independent licensed professional engineer and submitted to the TCEQ for approval.
- The TCEQ-approved final cover certification report will be maintained in the Site Operating Record and the Final Cover Application Log (see Section 4.18.5 of this SOP) will be updated to reflect the area where final cover has been placed, the date final cover was constructed, and the thickness applied that date. The TCEQ Regional Office will also be notified that final cover placement has occurred at the site.

The final cover system, including the erosion control structures (drainage swales and chutes) will be maintained during and after construction. During the active life of the site, the Landfill Manager or his designee or his designee will inspect the final cover system on a weekly basis. In addition, during the active life of the landfill, inspections of the final cover will occur within 72 hours of a rainfall event of 0.5 inches or more (i.e., 0.5 inches during a 24-hour period). Postclosure care inspection procedures are outlined in the Postclosure Care Plan.

4.18.5 Cover Application Log

Throughout the landfill operation, a Cover Application Log will be maintained by the Landfill Manager or his designee and be readily available for inspection in accordance with §330.65(h). For intermediate cover and daily cover, the log will specify the date cover (no exposed waste) was accomplished, the area covered (by use of the grid system), how it was placed, when it was completed, and the last area covered. For final cover, the log will show the final cover area, specify the area covered, the date cover was applied, the thickness applied that date, and reference the final cover certification report for each area. The signature of the Landfill Manager or his designee, or his designee, will certify each entry that the work was accomplished as stated in the log. Repairs will be documented in the log. The date of detection of erosion, or other repair issue, date of completion of repair (including reasons for any delays) will be included to document the report. In addition, both the volume of the soil stockpile required to be maintained within 1,000 feet of each working face and the volume of the earthen material required to cover each working face with at least a 1-day application of 6 inches of daily cover will be recorded each day on the Cover Application Log.

4.19 Prevention of Ponded Water

Site grading and maintenance will minimize the ponding of water over areas containing waste. Should ponding occur, the water will be removed as soon as practicable from areas not designated as stormwater collection areas in the Site Development Plan. Records of ponding preventive and corrective activities will be kept in the Site Operating

Record. The depressions will be filled and regraded as quickly as possible, but no later than 7 days from the end of the rainfall event (i.e., the end of the rainfall event is equivalent to the term "occurrence" as defined by §330.167). If the ponded water has come into contact with waste, leachate, or contaminated soils, it will be treated as contaminated water and handled in accordance with the Leachate and Contaminated Water Management Plan. As discussed in the Leachate and Contaminated Water Management Plan, contaminated water will be removed via a vacuum truck and transported to an off-site permitted treatment facility or processed in the liquid waste stabilization area (refer to Section 5 of the Leachate and Contaminated Water Management Plan).

The site will be inspected weekly, and within 72 hours of a rainfall event of 0.5 inches or more, to verify that no unauthorized ponded water areas exist (refer to Section 4.24). As noted in Section 4.24, documentation of the inspections will be maintained in the Site Operating Record. Ponded water in areas not over waste, such as in excavations, and detention ponds, is not prohibited so long as ponding in other areas does not cause or contribute to nuisance conditions. Ponding in these areas will be monitored to prevent nuisance odors. In addition, excavations will be pumped out as necessary to maintain the area as accessible to earth-moving equipment. Detention ponds will be maintained to perform as designed. Water contained in detention ponds or excavation areas may be used for dust control.

4.20 Disposal of Special Wastes

Special wastes, as defined in §330.3, may be accepted at the facility in accordance with §330.171(b) and (c) and the Waste Acceptance Plan (WAP) included in Appendix IVA. Special wastes other than those approved in the following paragraphs may be accepted if these wastes meet the acceptance requirements listed in the WAP. As specified in §330.171(b)(2) and the WAP, requests for approval to accept certain types of special wastes shall be submitted to the TCEQ or maintained in the Site Operating Record and will include the following:

- A complete description of the chemical and physical characteristics of each waste and the quantity, a statement as to whether or not each waste is a Class 1 industrial waste as defined in §330.3, and the rate at which each waste is produced and/or the expected frequency of disposal.
- If special handling instructions are required, they will be provided as part of the pre-approval process; including, the proposed procedures for handling waste and listing required protective equipment for operating personnel and onsite emergency equipment.
- Procedures and responsibilities for containment and cleanup of any accidental spills occurring during the delivery and/or disposal operation will be conducted. Typically, this will include the following:

- Employees involved in cleanup should make use of their spill control kits which may include: respirators, disposable coveralls, shoe covers, gloves, and safety glasses or goggles.
- Other site personnel will be directed away from the area until cleanup is complete.
- Excavate the waste material and transport it to the working face.
- Wash any contaminated equipment or machinery.
- If applicable, wash all other personal protective equipment with soap and water.
- If applicable, check respirator, refit with new filter cartridges, and place into a resealable, air-tight container for future use.

When special wastes are to be disposed of at the Itasca Landfill, a complete transporter and generator profile will be required prior to acceptance of the special wastes. This profile includes:

- A list of customers generating these special wastes, identifying each of the generator's special wastes (with supporting chemical analysis, where applicable) for which disposal is being requested.
- A copy of any generator registrations (TCEQ and USEPA) that further identifies the character of those wastes.
- A written declaration by the generator that the waste stream is non-hazardous waste. In addition, the generator will also note if the waste stream is a Class 1 non hazardous industrial waste.
- An estimate of the anticipated quantity, rate, and frequency of disposal for each special waste.

The above-listed information will be maintained in the Site Operating Record.

Following review of this information, the Landfill Manager or his designee or an appropriate Itasca Landfill representative will notify the generator in writing as to which, if any, of the requested wastes will be accepted for disposal. The above-listed information will be maintained in the Site Operating Record. In addition, the generator waste profile will be re-evaluated at a minimum of 3 years to verify consistency with the original approved waste profile. Itasca Landfill TX, LP will require the generator to complete a new waste profile as part of this re-evaluation process. The re-evaluated waste profile information will be maintained in the Site Operating Record.

A waste discrepancy report or similar documentation will be placed in the Site Operating Record when one or more of the following occurs:

1. A special waste arrives without a waste manifest or required shipping document.

2. An industrial or special waste arrives and the waste material does not match the description on the waste manifest or other shipping document.
3. An industrial or special waste arrives and the waste differs from the approved waste based upon QA/QC review or other monitoring.
4. The volume of the waste is not consistent with the information on the shipping documents.

The Scale Operators, Special Waste Liaison, Environmental Manager, or Landfill Manager or his designee will attempt to resolve any waste discrepancies. If the discrepancy can be resolved, the waste may be accepted and the discrepancy report will be filed to document the resolution of the discrepancy in the Site Operating Record. If the discrepancy cannot be resolved, the waste shipment will be rejected and a discrepancy report prepared and filed for the rejected waste shipment.

In addition, the special wastes identified in Sections 4.20.1 through 4.20.9 may be accepted at the facility without prior written authorization in accordance with §330.171(c).

4.20.1 Sludges

Sludges, grease trap waste, grit trap waste or liquid waste from municipal and industrial sources will be accepted if the material has been treated or processed, and has passed the paint filter test and is certified to contain no free liquid, as prescribed in §330.171(c)(7). Sludges which do not pass the paint filter test will be processed at the bulk liquid processing area where material(s) will be mixed with them for solidification (refer to the approved Waste Acceptance Plan for additional information). The material will be required to have passed a paint filter test as documented on the generator waste profile, prior to disposal at the working face of the landfill.

4.20.2 Dead Animals

The Itasca Landfill may receive dead animals or slaughterhouse wastes. Dead animals and slaughterhouse wastes will be buried at the working face and covered with a minimum of 3 feet of other solid waste or a minimum of 2 feet of soil immediately upon receipt. Additional waste or soil will be added over the dead animals if objectionable odors are created by the dead animals or slaughterhouse wastes.

4.20.3 Empty Containers

Empty containers, which have been used for pesticides, herbicides, fungicides, or rodenticides will be accepted and disposed of in accordance with Title 30 TAC §330.171(c)(5) and as outlined below.

1. These containers may be disposed of at the landfill working face provided that:
   (i) the containers are triple-rinsed prior to receipt at the site; and

(ii) the containers are rendered unusable prior to or upon receipt at the site.

2. Empty containers accepted at the site will be covered by the end of the same working day they are received.
3. Those containers for which triple-rinsing is not feasible or practical (e.g., paper bags, cardboard containers) may be disposed of by placing them in the working face and covering them with three feet of waste by the end of the day they were received. Containers from industrial locations must be classified as a Class 2 waste or Class 3 waste.

Used oil filters are not accepted at this facility.

4.20.4 Nonregulated Asbestos-Containing Materials

Non-regulated asbestos-containing materials (non-RACM) may be accepted for disposal provided the wastes are placed on the working face and covered in accordance with Section 4.18 of this SOP. Under no circumstances shall any material containing non-RACM be placed on any surface or roadway which is subject to vehicular traffic or disposed of by any other means by which the material could be crumbled into a friable state.

4.20.5 Regulated Asbestos-Containing Material (RACM)

RACM may be accepted at the facility in accordance with §330.171(c)(3). Prior to initial receipt of RACM at this facility, the Landfill Manager or his designee will dedicate a specific area of the site for receipt of RACM and notify the TCEQ in writing of the designated area. RACM disposal locations will be identified by surveying and marked on a current site drawing at the site. The identified area will be surveyed by a registered professional surveyor. Each load of RACM that arrives on-site will be documented. This documentation will include the volume of material, and the location and depth of its disposal. As the operation continues, the Landfill Manager or his designee or his designee will notify the TCEQ in writing of any new dedicated areas for RACM. The RACM disposal area will not be larger than 50 feet by 50 feet.

Delivery of RACM will be coordinated by the Landfill Manager or his designee or his designee so that the waste will arrive during times that it can be properly managed by site personnel.

RACM will be accepted at the site only if it is contained in tightly closed containers or bags, or wrapped as necessary with 6-mil-thick polyethylene.

RACM will be placed in landfill units such that it will not be exposed as a result of erosion or weathering. RACM will be placed below natural grade where practical or possible. However, where this is not practical or possible, the RACM will be placed at least 20 feet away from exterior final sideslopes, and at least 10 feet below final grade. During unloading and placement of RACM in the waste fill, care will be exercised to prevent breaking open the bags or containers. One foot of soil cover or 3 feet of asbestos-

free municipal solid waste will be placed over the RACM immediately after it is placed in the landfill unit.

RACM that has been designated as Class 1 industrial solid waste, will be disposed of in accordance with §330.173(c) and in accordance with this section of the Site Operating Plan.

Shipments of Class 1 RACM must be accompanied by a waste manifest document. The waste manifest is to be completed by the generator and transporter, and shall accompany the driver of each waste load. The facility will then verify pre-authorization for disposal and complete the destination section of each manifest and return one copy of the completed manifest to the driver. One copy of the completed waste manifest will also be returned to the waste generator within 30 days after receipt of the waste. Manifests are prepared in triplicate and the remaining copy will be filed in the Site Operating Record. Acceptable manifests will include at least the following information:

1. Identity and telephone number of the generator;
2. Type and quantity of waste obtained from the generator;
3. TCEQ registration number and TCEQ waste code (if applicable);
4. Specific site for disposal.

A waste discrepancy report will be completed when:

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

The facility will not accept or sign for shipments of Class 1 waste for which authorization by the TCEQ has not been granted or has not been authorized by permit provisions.

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

The Landfill Manager or his designee, or his designee, will contact the transporter and/or generator and notify them of the identification of any unauthorized waste. The transporter and/or generator will be required to take all necessary steps to determine the

origin and to assure that in the future such wastes are either not collected or are taken to a facility approved to accept such waste. The appropriate state agency will also be contacted to provide the name and contact information of the transporter and to report measures taken to resolve the arrival of unauthorized waste (e.g. returned to the transporter or disposed of by Itasca Landfill at an approved facility). Multiple instances of unauthorized wastes found from the same transporter or generator may result in Itasca Landfill refusing to accept waste from that transporter or generator.

All information and documents pertaining to Class 1 RACM profiled for disposal and delivered to the landfill for disposal including but not limited to, all records concerning measurements and analyses performed at the site, shall be retained in the Site Operating Record for a period of three years.

Additionally, the TCEQ Monthly Waste Receipt Summary will be prepared by the Landfill Manager or his designee, or his designee, and submitted to the TCEQ. This report will be submitted consistent with TCEQ requirements. Reports will be on forms provided by the TCEQ. The facility will file reports, including those months in which they receive no Class 1 RACM at the facility, unless the TCEQ grants an exception. The reports will summarize the quantity, character, generator identity, and the method of storage, processing and disposal of each Class 1 RACM shipment received, and itemize by manifest document number as required by the TCEQ.

In addition and according to 30 TAC §330.675, a Quarterly Municipal Solid Waste Fee Report will be submitted to the TCEQ on a form provided by the TCEQ. In addition to a statement of the amount of Class 1 RACM received for processing or disposal, the report will contain other information requested on the form, typically including amount of other wastes received, the facility operator's name, address, and phone number, the permit number and other information as requested. The required quarterly report will be submitted to the TCEQ within the time frame required by the TCEQ.

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

Upon closure of the facility, a notation indicating that the site accepted RACM will be placed in the deed record. This notation will indicate where the RACM was disposed of on the property by showing its location on a site diagram. A copy of this documentation will be provided to the TCEQ.

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

- Personnel will take positions upwind of the RACM spill area during the cleanup procedures.
- Employees involved in cleanup should make use of their spill control kits which may include: respirators, disposable coveralls, shoe covers, gloves, and safety glasses or goggles.
- Other site personnel will be directed away from the area until cleanup is complete.
- If the spill of RACM involves a reportable quantity (one pound or more), the National Response Center (NRC) must be notified by the Landfill Manager or his designee or his designee.
- Emergency cleanup actions will include the following.
    - Summon water truck, wet down waste with water.
    - Excavate the waste material and place it into a properly labeled bag or a closed container and dispose of it with the other RACM.
    - Wash any contaminated equipment or machinery.
    - Dispose of gloves, coveralls, and shoe covers in a tightly sealed 6 mil plastic bag.
    - Wash all other personal protective equipment with soap and water.
    - Check respirator, refit with new filter cartridges, and place into a resealable, air-tight container for future use.
- Any water used to wet down the spilled material that has pooled will be removed with a vacuum truck. The removed water will be transported to a properly permitted privately owned off-site wastewater treatment facility or POTW.
- Soil that has contacted the water used to wet down the RACM will be excavated and disposed of at the working face. The excavation of this material will occur immediately after the RACM has been removed.

Upon closure of the facility, a notation indicating that the site accepted RACM will be placed in the real property records of Hill County. This notation will indicate where the RACM was disposed of on the property by showing its location on a site diagram. A copy of this documentation will be provided to the TCEQ.

4.20.6 Class 2 and 3 Non-Hazardous Industrial Waste

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

- Class 2 Industrial Solid Waste - any individual solid waste or combination of industrial solid wastes that cannot be described as Class 1 or Class 3, as defined in §335.506 (relating to Class 2 waste determination). Examples of Class 2 Industrial Waste include "plant trash" or waste originating in the facility offices or plant production areas that are composed of paper and/or wooden packaging materials, glass, aluminum foil, aluminum cans, aluminum scrap, stainless steel, steel, iron scrap, plastics, styrofoam, rope, twine, uncontaminated rubber, uncontaminated wooden materials, equipment belts, wiring, uncontaminated cloth, metal buildings, empty containers with a holding capacity of five gallons or less, uncontaminated floor sweepings, or food packaging, that are produced as a result of plant production.
- Class 3 Industrial Solid Waste - any inert and essentially insoluble industrial solid waste, including materials such as rock, brick, glass, dirt, and certain plastics and rubber, etc. that are not readily decomposable as defined in §335.507 (relating to Class 3 waste determination).
- Class 1 Industrial Solid Waste that is defined as Class 1 only because of its asbestos content will be accepted and handled in accordance with the procedures listed in Section 4.20.5. Other Class 1 waste will be accepted consistent with the procedures outlined in Section 4.20.7.

Out-of-state Class 2 or Class 3 industrial waste must receive written authorization from TCEQ before it can be accepted for disposal at the Itasca Landfill.

4.20.7 Class 1 Non-Hazardous Industrial Waste

4.20.7.1 Waste Classes

This section addresses disposal of all Class 1 non-hazardous industrial solid wastes (Class 1 waste), as defined in 30 TAC §330.3. This section describes the specific acceptance and management procedures and criteria for these wastes, as referenced in 30 TAC §330.331(e). The provisions and requirements of 30 TAC §330.331(e) are incorporated herein and made a requirement of this plan.

4.20.7.2 Waste Evaluation and Acceptance Procedures

To ensure that the waste acceptance criteria of this plan is satisfied, all Class 1 waste intended for management and disposal at the Itasca Landfill will be evaluated and approved in accordance with the two-step process outlined below.

- Step 1 – Evaluation and approval by the Itasca Landfill staff as having met the conditions for classification as a "non-hazardous" waste (the evaluation guidelines listed in Section 3 of the WAP included in Appendix IVA will be followed to make this determination).
- Step 2 – Evaluation and approval by Itasca Landfill staff for meeting all permit conditions, state/local regulations and waste acceptance plan requirements.

The following forms and/or documentation are required to be submitted to Itasca Landfill TX, LP under the waste acceptance plan.

1. In-state waste generators desiring to dispose of Class 1 wastes at the Itasca Landfill will be required to submit a copy of their TCEQ Registration form. All in-state waste generators will be also required to submit documentation that the waste has been classified as a Class 1 waste by TCEQ, or self-classified as a Class 1 waste according to the TCEQ regulations.
2. Wastes generated outside the borders of Texas, and classified as Class 2 or 3 industrial waste, must receive written authorization from the TCEQ before it can be accepted for disposal at the Itasca Landfill. Copies of this authorization must be submitted to the Itasca Landfill TX, LP prior to waste acceptance.
3. All non-hazardous industrial waste from out of state will be managed as Class 1, unless a Class 2 or Class 3 designation is approved in writing by the TCEQ.

When Class 1 non-hazardous industrial wastes are to be disposed of at the Itasca Landfill, a complete generator profile will be required prior to acceptance of the Class 1 industrial waste. This profile includes:

- A list of customers generating these special wastes, identifying each of the generator's industrial wastes (including a complete description of the chemical and physical characteristics of the waste in accordance with §335.587) for which disposal is being requested.
- A copy of any generator registrations (TCEQ and USEPA) that further identifies the character of those wastes.
- A written declaration by the generator that the waste stream is non-hazardous waste.
- An estimate of the anticipated quantity, rate, and frequency of disposal for each Class 1 waste.

Following review of this information, the Landfill Manager or his designee or an appropriate Itasca Landfill TX, LP representative will notify the generator in writing as to which, if any, of the requested wastes will be accepted for disposal. The above listed information will be maintained in the Site Operating Record.

Analytical data indicating compliance with this plan shall be required as part of the generator profile as determined by the Special Waste Department or the Special Waste Liaison. Any analytical data submitted to Itasca Landfill TX, LP for use in the waste evaluation process shall meet the following criteria:

- Analytical data must be less than 12 months old;
- The analytical report must be legible, complete and signed;

- The analytical data must correspond with information requested on the generator profile sheet;
- The results must have the units of measure identified;
- The detection levels should be included for results that are "non-detected"; and
- The analytical methods employed must accompany the analytical data.

Additional information may be submitted that may assist Itasca Landfill TX, LP in evaluating an industrial waste for disposal at the Itasca Landfill. Such information may be analytical data, Material Safety Data Sheets (MSDS), additional waste composition data, pertinent letters or memos, or any other applicable waste shipment forms by the generator. Such information may be requested by Itasca Landfill TX, LP as determined by the Landfill Manager or his designee, representatives of the Special Waste Department, or the Special Waste Liaison and will be included in the Site Operating Record. In addition, the generator waste profile will be re-evaluated at a minimum of 3 years to verify consistency with the original approved waste profile. Itasca Landfill TX, LP will require the generator to complete a new waste profile as part of this re-evaluation process. The re-evaluated waste profile information will be maintained in the Site Operating Record.

4.20.7.3 Manifesting of Class 1 Wastes

Shipments of Class 1 wastes must be accompanied by a waste manifest document. The waste manifest is to be completed by the generator and transporter, and shall accompany the driver of each waste load. Itasca Landfill TX, LP will then verify pre-authorization for disposal and complete the destination section of each manifest and return one copy of the completed manifest to the driver. One copy of the completed waste manifest will also be returned to the waste generator within 30 days after receipt of the waste. Manifests are prepared in triplicate and the remaining copy will be filed in the Site Operating Record for a period of not less than 3 years. Manifests generally include at least the following information:

- Identity and telephone number of the generator;
- Type and quantity of waste obtained from the generator;
- TCEQ registration number and TCEQ waste code (if applicable);
- Identity of the responsible hauler; and
- Specific site for disposal.

4.20.7.4 Waste Discrepancy Report

This report will be placed in the Site Operating Record when one or more of the following occur.

- A Class 1 waste arrives without a properly completed waste manifest or similar shipping document.
- A Class 1waste arrives and the waste material does not match the description of the waste manifest or other shipping document.
- A Class 1 waste arrives and the waste differs from the approved waste based upon QA/QC review or other monitoring.
- A Class 1 waste arrives which does not match the information given on the original approval or the generator profile information submitted by the generator.

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

Shipments of Class 1 wastes are subject to the random waste inspections for identifying unauthorized wastes as described in Section 6.2. The Landfill Manager or his designee, or his designee, will contact the transporter and/or generator and notify them of the identification of any unauthorized waste. The transporter and/or generator will be required to take all necessary steps to determine the origin and to assure that in the future such wastes are either not collected or are taken to a facility approved to accept such waste. The appropriate state agency will also be contacted to provide the name and contact information of the transporter/generator and to report measures taken to resolve the arrival of unauthorized waste, (e.g., returned to the generator for disposal at an approved facility). Multiple instances of unauthorized wastes found from the same transporter or generator may result in Itasca Landfill TX, LP refusing to accept waste from that transporter or generator.

All waste discrepancies must be resolved before a waste can be accepted for disposal. Waste discrepancies will be described on the Waste Discrepancy Report. This report, when completed, will be placed in the Site Operating Record.

4.20.7.5 Quality Assurance/Quality Control (QA/QC)

Each load of Class 1 waste that is delivered to the Itasca Landfill for disposal, will receive a visual inspection to observe the contents and nature of waste. Additional inspections may be performed as determined and may include pH testing, reactivity testing, and ignitability testing. The results of any additional inspections will be recorded and referenced by manifest document number and maintained at the Itasca Landfill.

Additionally, all Class 1 wastes, except excluded loads, are subject to random screening, as well as, spot checking and testing as describe in Section 6.2.

4.20.7.6 Waste Placement and Cover

Class 1 waste may be placed only in dedicated waste disposal sectors that meet the requirement of 30 TAC §330.331(e). Placement, daily cover and intermediate cover will be accomplished consistent with the procedures for other wastes that are accepted at the landfill (refer to Section 4.18). Waste placement and cover requirements for both below grade (Option 1) and above grade (Option 2) Class 1 disposal options are listed below.

Class 1 Waste Below-Grade Disposal Option (Option 1)

Class 1 waste, other than asbestos-containing waste, may only be placed in designated disposal sectors and at or below the grades shown on Drawings I/IIA.3a and I/IIA.9 in Parts I/II and the Class 1 barrier layer details included in Part III, Appendix IIIA-A. Non-Class 1 waste may also be disposed of in the below grade Class 1 disposal area. When the sector has been filled to the grades referenced above, an extra thick intermediate cover layer (or barrier soil layer) of at least four feet of compacted clay-rich soil must be placed on top of the Class 1 waste and on any exposed side slopes. Municipal solid waste may then be placed above the extra thick intermediate cover to the final design grade.

The design of the Class 1 non-hazardous industrial waste disposal area is presented on Drawing I/IIA.9 in Parts I/II and Part III, Appendix IIIA-A. The design has been prepared consistent with the requirements of 30 TAC §330.331. The design of the Class 1 area is summarized below.

- As detailed in Part III, Appendix IIIA, the bottom and excavation side slopes of the area dedicated for Class 1 waste will be lined with a composite liner system consisting of a 60-mil HDPE FML overlying a 3-foot-thick compacted clay soil liner with a hydraulic conductivity of no more than $1x10^{-7}$ cm/sec. The liner system will be subjected to the requirements of the LQCP (refer to Part III – Appendix IIID).
- The leachate collection system will maintain less than 1 foot of leachate over the liner, constructed of materials that are chemically resistant to the leachate expected to be generated, and is designed to withstand the expected loads exerted by overlying wastes, waste cover materials, and by equipment used at the site. The design of the leachate collection system is included in the Leachate and Contaminated Water Management Plan (refer to Part III, Appendix IIIC).
- Stormwater runoff/runon controls consisting of berms and channels will be provided as required around each disposal sector. The working face for the Class 1 waste area, as well as the working face for the municipal solid waste (MSW) area, will each have its own runon and runoff controls as outlined in the Leachate and Contaminated Water Management Plan.
- A 4-foot-thick compacted clay-rich barrier soil layer will be placed over the Class 1 industrial waste as a separation layer between Class 1 waste and the municipal solid waste to be placed above. The proposed top of Class 1 waste is shown on Drawing I/IIA.12 in Parts I/II. The chimney drain system shown in Part III,

Appendix IIIA will be constructed to allow a pathway for the overlying MSW leachate to drain to the leachate collection system.

- Limits for Class 1 waste acceptance are discussed in Section 4.20.7.9.
- The working faces will move on a daily basis in relationship to each other; however, the MSW will be placed on a bench above the barrier soil layer such that there is enough horizontal operating room above the barrier soil layer to continue filling of MSW above the Class 1 waste.
- Disposal of leachate generated by sectors that include Class 1 waste disposal areas will be accomplished by the following methods.
  - Re-circulated. Refer to Part III, Appendix IIIC – Leachate and Contaminated Water Management Plan for additional information.
  - Transported to the Liquid Waste Bulking Facility or an off-site permitted disposal facility (e.g., POTW or commercial treatment facility).
- Each truck will stop at the scale house where directions to the appropriate working face will be provided. The scale attendant will direct waste haulers to follow the signs as they enter the facility. Access roadways will be clearly marked with portable signs directing Class 1 haulers to the Class 1 working face, and MSW haulers to the MSW working face. Spotters (or Equipment Operators) will verify waste cargo with haulers before unloading.

Above-Grade Class 1 Waste Disposal Option (Option 2)

With the above grade Class 1 waste disposal options, Class 1 waste or Class 1 waste mixed with other accepted wastes may be placed either below or above the compacted perimeter berm elevation, respectively, in areas with liners constructed in accordance with §330.331(e). The above grade Class 1 disposal option is shown on Drawing IIIA.3a in Part III – Appendix IIIA-A and summarized below.

- Above Grade Class 1 Waste Disposal Area with 4-foot-thick Separation Layer. This option allows for the disposal of Class 1 wastes above existing grade if containment dikes are constructed along the exterior slope of the Class 1 waste disposal area. The maximum allowable elevation of above-grade Class 1 waste fill is 940 ft-msl. This option also includes the placement of a 4-foot-thick compacted clay rich barrier layer that will be placed over the Class 1 waste as a separation layer between the Class 1 waste and the municipal solid waste (and other non-Class 1 waste material) to be placed above. With this option, the 4-foot-thick separation or barrier layer will be sloped toward the interior of the landfill.

Consistent with §330.173(e), the amount of Class 1 waste to be accepted for both Options 1 and 2 will be limited to a maximum of 20 percent of the total waste, not including Class 1 waste, accepted during the current or previous year. The amount of waste may be determined by volume or by weight, but the same unit of measure must be used for each year. Details of the landfill perimeter containment dike construction are included in the

cross-sections in Part III, Appendix IIIA-B, and described in detail in Part III, Appendix IIIA, Section 5.3.

Survey markers will be installed along the boundary of the Class 1 area to clearly designate the boundary of the above grade Class 1 area. The markers will be installed in sufficient numbers to clearly mark the Class 1 area, including the required set-backs specified in Part III, Appendix IIIA. The Class 1 markers will be inspected monthly to ensure they are installed and maintained in accordance with the requirements of this SOP.

Class 1 Waste Disposal Area Unloading Procedures

In areas where Class 1 and MSW will be comingled, the unloading procedures for the combined working face will be consistent with the waste unloading procedures specified in Section 4.2.3 (Waste Unloading Procedures). For example, Spotters, Equipment Operators, or other field personnel will be present at the combined working face at all times to monitor incoming loads 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 (refer to Section 2.2 for training procedures). The personnel will also be trained in and have a basic understanding of both industrial and hazardous waste and their transportation and disposal requirements. As discussed in Section 4.2.3, site personnel will establish unloading positions at the working face. The unloading positions are basically equally spaced lanes that each collection vehicle uses to unload waste material from the collection vehicle to the working face. Typically, each lane is about 20 feet wide. When the Class 1 and MSW working face are combined, if warranted, the distance between the unloading positions utilized by Class 1 waste collection vehicles and MSW collection vehicles may be increased. This additional distance will provide a buffer between Class 1 unloading positions and the non-Class 1 unloading positions, which may be used by individual citizens. The Spotters and Equipment Operators will monitor the working face to verify that adequate spacing is maintained between vehicles, dust is minimized, and waste is being offloaded to the working face area in a safe manner (refer to Section 8 for additional safety information).

The Spotters and Equipment Operators will police the working face to verify that Class 1 waste is safely offloaded to the working face. If special handling procedures are required for Class 1 waste, then the working face personnel will be notified prior to the arrival of the waste haul vehicle at the working face so that the Spotters and Equipment Operators can take appropriate action (e.g., special handling procedures could include verifying that daily cover is placed over waste to minimize exposure to the atmosphere and/or establish a separate area at the working face to ensure that no other hauler is within a specified distance of the specific unloading position for the Class 1 waste that requires special handling).

4.20.7.7 Recordkeeping and Reporting

All information and documents pertaining to Class 1 waste profiled for disposal and delivered to the landfill for disposal in the Class 1 cell including but not limited to, all

records concerning measurements and analyses performed at the site, shall be retained at the site in accordance with the provisions in Section 9.

Additionally, the TCEQ Monthly Waste Receipt Summary Report will be prepared by the Landfill Manager or his designee, or his designee, and submitted to the TCEQ. This report will be submitted consistent with TCEQ requirements. Reports will be on forms provided by the TCEQ. The facility will file reports, including those months in which they receive no Class 1 waste at the facility, unless the TCEQ grants an exception. The reports will summarize the quantity, character, generator identity, and the method of storage, processing and disposal of each Class 1 waste shipment received, and the reports will be itemized by manifest document number as required by the TCEQ.

In addition and according to 30 TAC §330.675, a Quarterly Municipal Solid Waste Fee Report will be submitted to the TCEQ on a form provided by the TCEQ. In addition to a statement of the amount of Class 1 waste received for processing or disposal, the report will contain other information requested on the form, typically including amount of other wastes received, the facility operator's name, address, and phone number, the permit number, and other information as requested. The required quarterly report will be submitted to the TCEQ within the time frame required by the TCEQ.

4.20.7.8 Contingency Plan

Should an incident occur where hazardous wastes, radioactive waste, or other prohibited wastes are suspected or discovered, the waste will not be authorized for disposal but, instead, it will be isolated until the material can be adequately identified to determine the proper disposition/remediation of the material and the appropriate handling procedures. During this identification process, the generator's representative will be contacted to determine the identity of the material, and the TCEQ will be notified of the incident and the planned disposition/remediation of the material. The proper disposition/remediation of the prohibited waste will be specific to the waste and will be implemented upon TCEQ concurrence and approval.

Should any accidental spills of special wastes occur on this site they will be immediately contained by earthen dikes, berms or by other appropriate measures. The Landfill Manager or his designee shall be promptly notified of the spill and shall coordinate the collection and disposal of the spilled material. The spilled wastes will be picked up mechanically or by employees wearing proper protective equipment and managed according to procedures for handling the special waste.

The Landfill Manager or his designee will note in the Site Operating Record the time, date, and details of the incident. Within 15 days after the incident a written report on the incident will be submitted to the TCEQ. The report will include the following.

- name, address, and telephone number of the owner or operator;
- name, address, and telephone number of the facility;
- date, time, and type of incident;

- name and quantity of material(s) involved;
- the extent of injuries, if any;
- an assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- estimated quantity and disposition of recovered material that resulted from the incident.

4.20.7.9 Class 1 Nonhazardous Industrial Waste Acceptance Limits

Consistent with Title 30 TAC §330.173(e), unless specifically authorized by the TCEQ, the facility will not accept Class 1 industrial solid waste in excess of 20 percent of the total amount of waste (not including Class 1 waste) accepted during the current or previous year. The amount of waste may be determined by volume or by weight, but the same unit of measure must be used for each year. In addition, when the Class 1 disposal area is extended above the perimeter berm elevation, construction of containment dikes along the exterior sideslope of the landfill is required (refer to Part III – Appendix IIIA, Section 5.3).

4.20.8 Health Care Facility Waste

Special wastes from health care related facilities that have been treated in accordance with the procedures specified in Subchapter Y of the TCEQ regulations (relating to Medical Waste Management) will be accepted.

4.20.9 Municipal Hazardous Waste from a Conditionally Exempt Small Quantity Generator (CESQG)

CESQG will be accepted at this facility provided the amount of waste does not exceed 220 pounds (100 kilograms) per month per generator, and provided the Landfill Manager or his designee or his designee authorizes the acceptance of the waste.

4.20.10 TSCA PCB Waste

This section addresses disposal of certain types of polychlorinated biphenyl (PCB) wastes that will be accepted consistent with the EPA permit and are subject to the Toxic Substances Control Act (TSCA) under 40 CFR 761 Subpart D. The draft EPA TSCA permit for disposal of TSCA PCB waste is included in Appendix IVF. The final TSCA permit will be maintained in the Site Operating Record. PCB waste authorized by the EPA permit will be disposed of in the Class 1 waste disposal area at the Itasca Landfill. The acceptance and disposal of TSCA PCB waste will not compromise or interfere with the landfill's compliances with the TCEQ MSW rules. This section describes the waste receiving, disposal, handling, and decontamination procedures for these wastes.

4.20.10.1 Waste Receiving Procedures

TSCA PCB waste included for management and disposal at the Itasca Landfill will be accompanied by a completed non-hazardous waste profile. An example non-hazardous waste profile is located in Appendix IVE-C. All PCB wastes are identified and inspected by trained facility personnel. Following the checklist in Appendix IVE-A,

7 FIRE PROTECTION PLAN

The purpose of this section is to set forth the Fire Protection Plan for the site. This plan addresses each operational activity that stores, processes, or disposes of combustible materials. Theses areas at the Itasca Landfill include:

- Each Unloading Area (MSW Working Face, Class 1 Working Face, RACM Unloading Area, Citizen Convenience Center, and Liquid Waste Bulking Facility). Refer to Section 7.7, 7.8, 7.9, and 7.10 for fire fighting information regarding these areas.
- Vehicles and Heavy Equipment used at the site. Refer to Section 7.5 for fire fighting information for vehicles and heavy equipment.
- On-site Structures (scale house and hauling company/maintenance building). Refer to Section 7.6 for fire fighting information regarding on-site structures.

In addition to the above, the following subsections present information regarding fire protection training, fire protection standards, accidental fires, fire prevention procedures, and contacting the fire department and TCEQ.

7.1 Fire Protection Training

Within thirty days of initial employment and thereafter at least annually, all employees, except personnel with administrative duties only, will receive the following fire training and instruction.

1. Detailed review and discussion of the Fire Protection Plan
2. Training on fire prevention and hazard awareness
3. Specific instruction on operation, use, and limitation, of the portable fire extinguishers and other fire fighting equipment (e.g., water cannon on water truck)
4. Instruction on the properties of methane gas and proper safety procedures
5. Facility evacuation procedures
6. Fire Fighting Techniques
7. Emergency Response
8. First Aid

Personnel with administrative duties only will receive annual fire protection training on facility evacuation procedures and fire prevention as designated by the Landfill Manager or his designee. Each training session for both operating and administrative personnel will be documented with a form identifying the type of training, topics covered, trainer, and attendees. Training records will be retained in the Site Operating Record.

7.2 Fire Protection Standards

7.2.1 Posted Information

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

1. Emergency contact phone number(s) for site personnel at the main entrance to the site.

2. "No Smoking" signs posted at the entrance, leachate risers, leachate tank(s), and other areas deemed necessary by the Landfill Manager or his designee.

7.2.2 Fire Safety Rules

The following fire safety rules will be posted in the employee meeting area.

1. Do not attempt to fight fire alone.
2. Be familiar with the use and limitation of fire-fighting equipment.
3. Alert other facility personnel in the area.
4. Assess extent of fire and likelihood that the fire will spread.
5. Contact the local fire department at 911, as necessary.
6. Attempt to contain or extinguish the fire, if the fire can be safely fought with onsite fire-fighting equipment. Otherwise attempt to contain the fire until the fire department arrives.

7.2.3 Burning Waste Loads (Hot Loads)

Steps will be taken to identify incoming "hot loads" prior to their being unloaded for disposal at the working faces. The Scale Operators, Equipment Operators, Laborers and Spotters must be alert for signs of hot loads, such as smoke, steam, or heat being released from incoming waste loads.

Fire-fighting methods include smothering with soil, separating burning material from other waste, or spraying with water from the water truck. A small fire may be controlled with a hand-held extinguisher.

In the event of a fire within a vehicle or piece of equipment, the vehicle will be brought to a safe stop away from any fuel storage area or exposed waste. The vehicle or equipment

will be driven away from the active area(s) and the load ejected in the hot load area(s) which will be identified and sufficiently marked in advance, preferably at least 50 feet away from a road, with either no waste deposited or waste with at least six inches of soil cover. A water truck, bulldozer, or other equipment will be used to extinguish the burning waste load. The waste will be covered with an adequate amount of soil to ensure it is extinguished. The load will be inspected by the Landfill Manager or his designee, or his designee, before transporting it to one of the working faces. During inspection, if the soil is removed, which would allow oxygen to contact the waste, the load will be observed for hot spots or flare-ups. No smoldering or smoking waste will be placed in the working face area for permanent burial until all hot spots or flare-ups have been extinguished.

If it is not possible to move a burning vehicle away from fuel storage or exposed waste, the local fire department shall be called immediately at 911. While awaiting the arrival of the local fire department, all reasonable measures should be employed to extinguish the fire and prevent it from spreading beyond the vehicle.

7.3 Accidental Fires

Open burning of waste at the site is not permissible. All fires will be extinguished using the protocols stated in this section. Proper compaction and earth cover will be used to minimize the potential for accidental fires.

7.4 Preventive Procedures

Fuel spills will be controlled immediately. Soil contaminated with spilled fuel will be excavated and, if authorized, disposed of at the working face. Contaminated soils may be excavated using a shovel for small areas or with heavy equipment as appropriate. 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 and 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 cleaners. 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.

Each piece of engine driven equipment at the site listed in Table 3.1 will carry a portable fire extinguisher. 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. The piece of equipment shall not be returned to normal service without a fully charged fire extinguisher installed.

7.5 Vehicle or Equipment Fire

If equipment or other site vehicles experience a fire, the operator will attempt to bring the vehicle or equipment to a safe stop, away from fuel supplies, uncovered solid waste, and other vehicles. The operator will attempt to shut off the engine and engage the brake. Lowering of any implements should be attempted as a means to prevent subsequent movement of the vehicle. As addressed in Section 7.4, each vehicle or piece of equipment will carry a portable fire extinguisher.

7.6 Structure Fire

The local fire department will be called at 911 for all structure fires. No site personnel will enter a structure on fire. Fire extinguishers will be placed in all of the onsite structures (e.g., scale house and hauling company/maintenance building). The fire extinguishers will be checked and certified annually. Once an extinguisher is used, it is to be replaced as soon as possible.

7.7 Working Face(s) Fire Protection Plan

7.7.1 Working Face Fire Protection Requirements (§330.129)

§330.129 sets forth the following two methods for fire protection:

- Maintain a source of earthen material large enough to cover the working face with 6 inches of earth material within a 1-hour period, or
- An alternate method that is approved by the Executive Director of the TCEQ.

The plan set forth in this section provides an alternate method to the prescriptive fire protection plan included in the first bullet listed above. In addition, for the waste acceptance rate of 0 to 1,500 tons/day, the site has the option to use either the alternate plan described in this section or the method described in the first bullet.

This alternate plan utilizes both water and earthen material (as well as fire extinguishers for small fires) to provide fire protection for each working face. This alternate plan provides a more comprehensive fire protection plan than the prescriptive plan. By keeping a water source near the working face, the site will be able to fight and control fires more effectively than just through the use of covering working face fires with soil. For example, fires can be controlled much more quickly with the application of water as

soon as a fire is detected rather than having to move equipment to cover the burning area with soil.

7.7.2 Working Face Fire Fighting Plan

When a fire is detected within material at the working face (MSW or Class 1), the Laborer or 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 consists of 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 Manager or his designee 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. Inspection of the fire area will be conducted by the Landfill Manager or his designee 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 30 feet by 30 feet. Inspection of the fire area will be conducted by the Landfill Manager or his designee or his designee.
- The burning waste material within the working face will be sprayed with water from one of the water truck(s) (or tank(s)) stationed at 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 Manager or his designee 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 Manager or his designee 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 the entire working face.

In each case listed above, after the Landfill Manager or his designee or his designee confirms that the fire has been extinguished, waste filling operations in that area may resume. In the event that the fire cannot be controlled using the methods above, the local fire department will be called at 911 (refer to Section 7.12 for additional information regarding contacting the fire department).

7.7.3 Water Trucks or Storage Tank Requirements

As specified below, a water source will be maintained near each working face (either a water truck(s) or storage tank(s)). The water truck(s) or tank(s) will be equipped with a water cannon and positioned to assist with the fighting of any potential working face fire. For the Class 1 working face, the on-site water truck may be used as the water source and will be located in an area that provides direct access to the Class 1 working face.

Maximum Working Face Size (width by length)	No. of Water Trucks or Tanks[1] (minimum capacity of 2,000 gallons)
150 feet by 175 feet (or 26,250 sf)	1 (or 2,000 gallons)
250 feet by 325 feet (or 81,250 sf)	1 (or 2,000 gallons)
375 feet by 450 feet (or 168,750 sf)	2 (or 4,000 gallons)
525 feet by 600 feet (or 315,000 sf)	3 (or 6,000 gallons)

[1] The tank or truck size will be based on the required volume. For example, a water truck that has a 4,000-gallon tank is acceptable for a working face size of 375 by 450 feet.

The on-site stormwater detention ponds will be used as a source of water for fire control. In addition, the water level in the tank(s) will be verified once per day to ensure that each tank contains at least the required volume of water. Also, during periods of freezing temperatures, measures will be taken to ensure that the tank(s) remain operational.

As noted in Section 7.7.2, the water trucks or tanks will be used to both keep a fire from spreading and also to extinguish fires. The additional water trucks used for site operations (refer to Table 3.1) will also be available to assist with fire fighting activities. Each water truck or portable tank will be refilled, as needed, to provide a constant source of water at the working face for fire fighting purposes.

7.7.4 Soil Stockpile Requirements

A soil stockpile will be maintained within 1,000 feet of each working face. The stockpile will be used to (1) smother burning waste material at the working face or (2) placed over burning waste material that has been cut out of the working face. The stockpile will be sized to cover 25 percent of the size of each working face (or 100 percent if the option to maintain a source of earthen material large enough to cover the working face with 6 inches of earthen material within a 1-hour period is selected). In addition, enough earthen material (i.e., soil stockpiles and soil within borrow areas) will be maintained on-site to cover the entire working face within 24 hours. The earthen material requirements are listed in the following table.

Size of Working Face	Earthen Material Volume Requirements		
Area of Working Face in Square Feet	Volume of Earthen Material Required to Cover the Working Face Area with 6 inches of Soil	Volume of Earthen Material Required to Cover the Working Face Area with 6 inches of Soil	Volume of Earthen Material Required to be Maintained Within 1,000 feet of the Working Face
26,250 ft^2	13,125 ft^3*	486 yd^3	122 yd^3
81,250 ft^2	40,625 ft^3*	1,505 yd^3	377 yd^3
168,750 ft^2	84,375 ft^3*	3,125 yd^3	781 yd^3
315,000 ft^2	157,560 ft^3*	5,833 yd^3	1,458 yd^3

*26,250 ft^2 x 0.5 ft (0.5 foot thickness is obtained by using a 6-inch thickness of cover for a 1-day period over the working face).

Along with the list of equipment, calculations that show how the specified equipment can cover 25 percent or 100 percent of the working face in one-hour will also be maintained in the Site Operating Record. The calculations will consider the following.

- Capacities of loading and unloading equipment
- Transportation route to the stockpile and working face
- Time needed to spread available soil on the working face (note that the top 6 inches of areas adjacent to the working face that have 12 inches of intermediate cover may be used as a soil source).

An example calculation is listed below.

Largest stockpile to be located within 1,000 feet for 100 percent coverage of 0 to 1,500 tons/day working face (refer to the table above).

Volume of Cover = V_c = 486 cy

Assume:

Truck Capacity = TR_c = 20 cy

Number of Trucks = N_{TR} = 3
Average Truck Velocity = v_A = 12 mph = 1,056 fpm
Time to Cover Working Face = t = 60 min

Total Number of Loads (L):

$L = V_c / TR_c$ = 486 cy / 20 cy = 25 loads

Number of Feet Traveled for Truck (D_{TR}) in t:

$D_{TR} = v_A \times t$ = 1,056 fpm x 60 min = 63,360 ft

Distance of Stockpile from Working Face (D_s):

$D_s = (D_{TR} / (L / N_{TR}))$ = 63,360 ft / (25 loads/3 trucks) = 2,534 ft (round trip)
D_s = 2,534 ft / 2 = 1,267 ft

Therefore, in this case a 486 cy stockpile could be maintained within 1,267 feet of the working face. However, a minimum distance of 1,000 feet is specified.

Largest stockpile to be located within 1,000 feet for 25% coverage (refer to the table in Section 7.7.4 on the previous page).

Volume of Cover = V_c = 1,458 cy

Assume:
Truck Capacity = TR_c = 20 cy
Number of Trucks = N_{TR} = 3
Average Truck Velocity = v_A = 12 mph = 1,056 fpm
Time to Cover Working Face = t = 60 min

Total Number of Loads (L):

$L = V_c / TR_c$ = 1,458 cy / 20 cy = 73 loads

Number of Feet Traveled for Truck (D_{TR}) in t:

$D_{TR} = v_A \times t$ = 1,056 fpm x 60 min = 63,360 ft

Distance of Stockpile from Working Face (D_s):

$D_s = (D_{TR} / (L / N_{TR}))$ = 63,360 ft / (73 loads/3 trucks) = 2,604 ft (round trip)
D_s = 2,604 ft / 2 = 1,302 ft

Therefore, in this case a 1,458 cy stockpile could be maintained within 1,302 feet of the working face. However, a minimum distance of 1,000 feet is specified.

A water source at the working face at all times and a soil stockpile within 1,000 feet will facilitate a quick response to fires at the working face. Any working face fire will be controlled quickly so that it will not spread. Because of the quick response provided by

this plan, working face fires will encompass no more than 10 percent to 15 percent of the working face. Therefore, by maintaining a soil stockpile within 1,000 feet of the working face, which is large enough to cover 25 percent of the working face, enough soil will be available to cover the area with burning waste, including a significant contingency.

Old stockpiles which have been replaced may be used as daily cover or intermediate cover. At least monthly, the Landfill Manager or his designee, or his designee, will evaluate the maximum anticipated working face area for the current conditions (refer to Section 4.2 for the specified range of working face areas) and will evaluate the available soil stockpile volume and location for sufficiency. This evaluation (and the evaluation of needed equipment) will be maintained in the Site Operating Record. The maximum anticipated size of the working face shall be calculated and a minimum volume of earthen material (i.e., soil stockpiles or soil within borrow areas) shall be determined to cover the maximum anticipated working area for each working face, with at least a 1-day application of 6 inches of daily cover. The volume of earthen materials available shall be estimated by determining the cubic yards of material hauled or placed during the creation of the stockpile or measuring the current stockpile or borrow area dimensions and applying appropriate geometric volume formulas. Each evaluation will be documented in the Site Operating Record. The minimum equipment listed in Table 3.1 will provide for sufficient equipment to transport and spread soil from the stockpile or borrow area to the working face.

7.8 RACM Area Fire

Earthen material in capacity of at least 50 cubic yards will be maintained within 100 feet of the RACM disposal area. This earthen material will cover the 50 foot by 50 foot maximum disposal area size with 6 inches of soil. Refer to Section 7.7 for additional fire fighting information for this area.

7.9 Convenience Center Fire

If a fire occurs in the Convenience Center, site personnel will first redirect incoming loads away from the affected area. Fire-fighting methods include smothering with soil, separating burning material from other waste, or spraying with water from the water truck. A small fire may be controlled with a hand-held extinguisher. Upon extinguishing the fire, the portion of the Convenience Center area affected by the fire 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 Manager or his designee or his designee.

7.10 Liquid Waste Bulking Facility Fire

Refer to Appendix IVC for a detailed fire protection plan for the liquid waste bulking facility.

7.11 Contacting Fire Department and TCEQ

In the event of a fire at the facility, the Landfill Manager or his designee, or his designee, will call 911 (if needed), or the local fire department, and report the fire. If fire fighting assistance is needed from the local fire department, the Landfill Manager or his designee will also notify Scale Operator, who will direct the fire department personnel to the scene of the fire.

If a fire occurs that is not extinguished within 10 minutes of detection, the TCEQ's Regional Office will be contacted no later than four hours by telephone, and in writing within 14 days with a description of the fire and the resulting response.

During each calendar year, the Landfill Manager or his designee will invite the local fire department to tour the facility so that they may be informed about site operations and the facility's layout (e.g., familiarization with the location of access roads and water sources).

In addition, this Fire Protection Plan will be reviewed by the Landfill Manager or his designee, and the landfill management team, after the occurrence of a significant fire to determine if modifications to the plan are warranted.

8 SAFETY

8.1 General Site Safety

Properly trained personnel using well-maintained equipment to perform standard work procedures in accordance with OSHA guidelines will promote site safety. Limiting access to the active areas to only authorized personnel will enhance site safety. In the event of an emergency, planned emergency response procedures will be followed.

All site personnel will receive appropriate site-specific training in at least of the following areas:

- Safe work practices
- Equipment and vehicle safety
- Site access controls
- Hazardous material communication
- Fire safety
- Emergency response
- Employee rights and responsibilities

A record of training will be maintained to confirm that each employee has received the proper training (refer to Section 2.2 for additional information).

Well-maintained equipment is vital to the safe conduct of daily landfilling operations. Therefore, all site equipment will be maintained in proper working order and all safety guards, backup alarms, and engine kill switches will be operational. Equipment Operators will perform an equipment check at the beginning of each workday. Fire extinguishers will be inspected routinely (refer to Section 7 for additional information). Records of all inspections will be maintained as part of the Site Operating Record.

Access to the site will be limited to authorized personnel as described in Section 4.1 of this SOP. Access is controlled by a combination of signs and physical barriers. Site personnel are responsible to be alert for the entrance of unauthorized personnel or the entrance of authorized personnel into prohibited areas.

In the event of an emergency, site personnel will assess the situation, notify the Landfill Manager or his designee or designee, and take appropriate actions such as rendering aid,

calling for assistance, or closing access to the emergency scene. Emergency numbers will be posted beside the telephone in the site office.

These include:

Ambulance:	911
Fire:	911
Sheriff/Police:	911

8.2 Preparedness and Prevention Measures

Preparedness and prevention measures have been developed to minimize both frequency and severity of accidents and emergency situations threatening human health. Preparedness and prevention measures depend largely on the attentiveness and state of readiness of facility personnel. Preparedness and prevention measures have been developed for one general category and two specific areas of the site: the Scale House and the onsite access routes. These preparedness and prevention measures are detailed in the following sections.

8.2.1 General

General preparedness and prevention measures that will be followed at the Itasca Landfill are:

- Access controls will provide for the safety of non-landfill personnel.
- Routine preventive maintenance of equipment will be provided.
- A management representative will perform site inspections as noted in Section 4.24.
- Appropriate personnel safety equipment will be kept onsite and maintained in good repair.
- Adequate turning area for hauling vehicles will be provided.
- Salvaging and scavenging will not be allowed.
- Waste unloading will be restricted to designated areas only.
- Site personnel will be alert for possible hazardous or other unauthorized wastes.
- Nonapproved wastes will be controlled or contained and removed as necessary.

8.2.2 Scale House

Preventive measures that will be implemented at the Scale House include the following:

- Monitor incoming wastes to ensure that all wastes loads are adequately secured, or otherwise secured or contained.
- Visually observe incoming vehicles for evidence of improper operation, faulty equipment, or other conditions that could be hazardous to personnel or other persons on site.
- Maintain access to appropriate emergency equipment and first-aid materials.
- Provide emergency telephone numbers that are conspicuously posted in the scalehouse and office.

8.2.3 Landfill Access Road

Preventive measures that will be implemented for the landfill access road include:

- Display speed limit, directional, and other precautionary signs on-site.
- Maintain roadway free from obstructions.
- Enforce requirements for safe operation of vehicles onsite.

REGION 6
DALLAS, TX 75270

November 22, 2024

MEMORANDUM

SUBJECT: Documentation of NHPA Section 106 Determination
Itasca Landfill EPA TSCA PCB Permit Reauthorization
EPA RCRA ID No. TXR000084604

FROM: Lisa Schaub, Remedial Project Manger
RCRA Corrective Action (LCR-RC)

THROUGH: Laurie King, Supervisor
RCRA Corrective Action Section (LCR-RC)

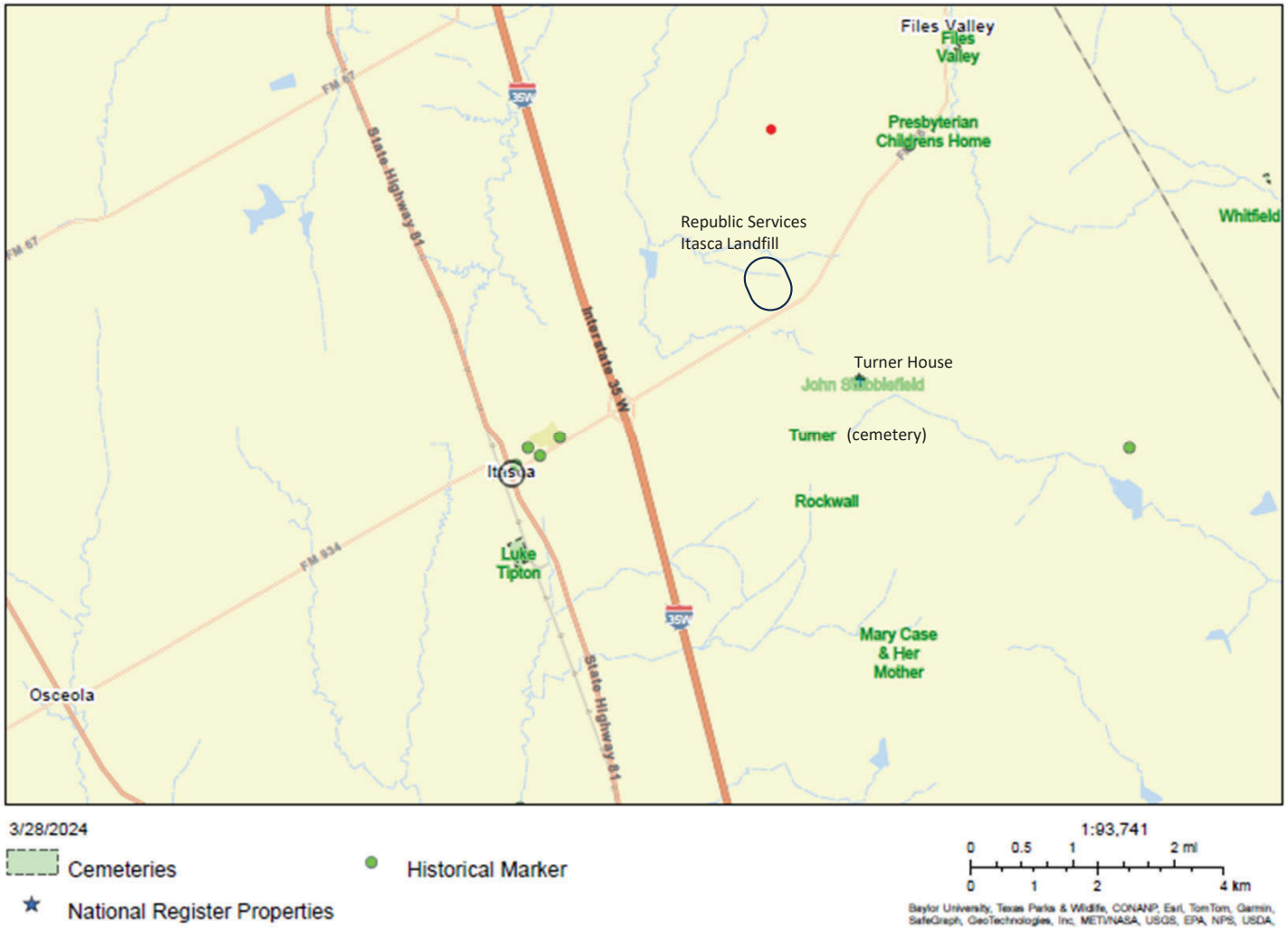
TO: File

Based on a review of the proposed reauthorization of the above facility to store PCB-containing waste, as well as the map of known historical resources in the area via the Texas State Historic Preservation Office's AtlasMap, permit approval will have no effect on historic properties. With the Area of Potential Effect being the immediately adjacent properties due to the viewshed, whereas the attached map indicates the nearest historic site, the Joe E. Turner House, is about a mile to the southeast of the site, no historic properties will be impacted.

ATTACHMENTS
1. Itasca Landfill – Google Maps
2. Itasca with Historic Resources

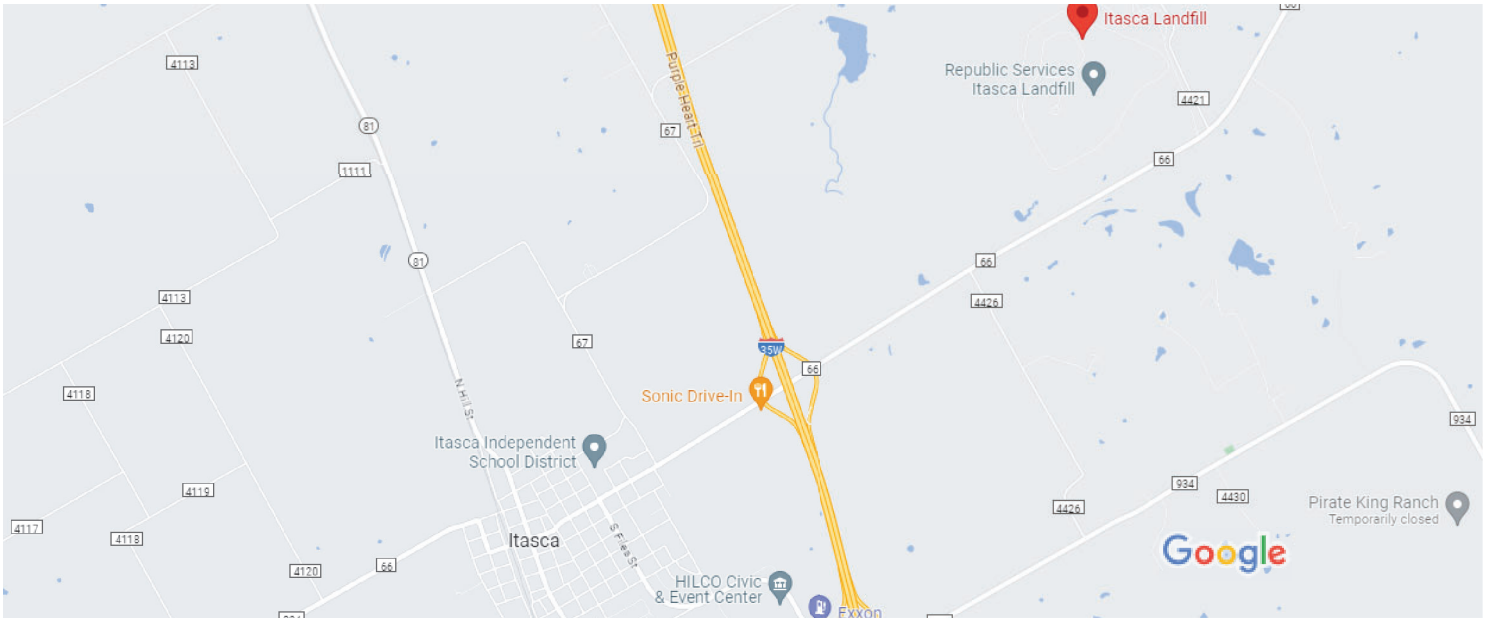
cc: Harry Shah, LCR-RP
Jay Przyborski, ORCD
Sunita Baniya, LCR-RP

Itasca with Historic Resources



Retrieved from: https://atlas.thc.texas.gov/Map

Google Maps Itasca Landfill



Itasca Landfill

4.2 ★★★★ (26)

Garbage dump

Overview Reviews About

Directions Save Nearby Send to phone Share

2559 FM 66, Itasca, TX 76055

Open · Closes 6 PM

4.14 Endangered Species

Information regarding endangered species is located in Parts *VII,* Section 12, in accordance with §330.6l(n) and §330.551. No endangered or threatened species have been documented at the site nor has a critical habitat for such species been identified at the site. Neither the facility nor its operation will result in the destruction or adverse modification of the critical habitat of endangered or threatened species or cause or contribute to the taking of endangered or threatened species. If endangered or threatened species are encountered during site operations, Texas Parks and Wildlife and U.S. Fish and Wildlife will be notified.

To prevent potential impacts to migratory birds, land-clearing activities in riparian areas will be conducted outside of the primary nesting season (March 1 to August 1). If clearing during the nesting season is necessary, a field investigation by a qualified biologist will be conducted to locate any active nests within the area to be cleared. If an active nest is found, avoidance of this nest and a buffer of at least 100 feet will be respected until nesting is completed. Documentation of the field investigation will be maintained in the Site Operating Record.