



REGION 6

DALLAS, TX 75270

November 19, 2025

Mr. Adam Kesterholt
Environmental Manager
CSC Landfill, Republic Services
101 Republic Way
Avalon, Texas 76623

RE: The United States Environmental Protection Agency Region 6 Re-authorization Approval of Republic Services, Inc. for Land Disposal of Polychlorinated Biphenyls (PCBs) at CSC Landfill in Avalon, Texas; EPA ID No. TXD000836585

Dear Mr. Kesterholt:

This letter and the enclosed "Approval Conditions" grants re-authorization to Republic Services, Inc. for land disposal of PCB waste at its facility in Avalon, Texas, pursuant to Section 6(e) of the Toxic Substances Control Act (TSCA). The EPA provided notice via a publication in the Ennis Newspaper, announcing the proposed approval which opened a 45-day comment period that ended on October 16, 2025. No comments were received.

Violation of 40 CFR Part 761 or any of the enclosed Conditions of Approval may subject Republic Services, Inc. to enforcement action under the TSCA and/or other applicable laws and regulations. Such action could result in a termination, revocation, or modification of the approval. This approval becomes effective on the date of this letter and expires at midnight, the same day and month, five years later. Please submit your re-authorization request at least one year before the expiration of this approval.

If you have questions, please contact Mr. Harry Shah, EPA Region 6 PCB Coordinator, at (214) 665-6457 or shah.harry@epa.gov.

Sincerely,

EUNICE
VARUGHESE


Digitally signed by EUNICE
VARUGHESE
Date: 2025.11.19 13:37:05 -06'00'

Eunice Varughese, Ph. D.
Director
Land, Chemicals and Redevelopment Division

cc: Charly Fritz, TCEQ

REPUBLIC SERVICES- CSC LANDFILL – PCB DISPOSAL APPROVAL CONDITIONS AND SUPPORTING DOCUMENTS

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REPUBLIC WASTE SERVICES OF TEXAS, LTD

CSC LANDFILL - APPROVAL OF PCB DISPOSAL

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 Republic Waste Services of Texas, LTD, CSC Disposal and Landfill, Ellis County, Texas.

I. LOCATION OF FACILITY

The Facility is located in Ellis County near Avalon, Texas, approximately 0.6 miles northeast of the intersection of State Highway 34 and FM 55.

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 described in 40 CFR § 761.60(a)(3) and are solidified offsite in accordance with condition III.A.6. 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 section 761.60(b)(1)(i)(B);
 - b. drained and flushed PCB hydraulic machines pursuant to section 761.60(b)(3)(ii) and section 761.60(b)(1)(i)(B);
 - c. drained and flushed PCB-Contaminated Electrical Equipment (except PCB Large Capacitors) pursuant to section 761.60(b)(4) and section 761.60(b)(1)(i)(B);
 - d. drained and flushed natural gas pipeline systems pursuant to section 761.60(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 section 761.60(b)(6) and section 761.60(b)(1)(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 pursuant to the record keep and retention requirements at 40 C.F.R. § 761.180 (b) and 761.180 (d). 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 no free-flowing liquids were present in each PCB Item to be disposed.

B. Units Authorized

The following disposal units are authorized for disposal of PCB wastes (no liquid wastes containing between 50 ppm and 500 ppm PCB may be disposed in the approved cells). The capacity of each unit is detailed in attachment A. Disposal of PCB waste at the Facility shall not exceed 100,000 tons annually without prior approval.

1. Landfill cells 3, 4A, 11, and 12.

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 the TCEQ and TSCA- PCB chemical waste landfill 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 the EPA in writing and receive written approval from the EPA before PCB wastes may be disposed in the cell after the cell has been modified or expanded.

e. Waste Characterization and Acceptance

CSC Landfill shall require generators to submit a PCB non-hazardous waste profile along with waste shipments (Appendix A-3). CSC Landfill 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 storage and disposal areas shall comply with 40 CFR Part 761, Subpart D, 40 CFR § 761.75(b)(1) - (9) (Technical requirements), the Facility original application dated September 2003 and revisions through May 2025.
2. The design, construction and operation of the PCB disposal areas shall also comply with the effective Texas Commission of Environmental Quality (TCEQ) Municipal Solid Waste (MSW) permit (Permit No. MSW 1209-B).

3. No PCB liquids or items containing PCB liquids may be disposed in the PCB landfill cells. PCB liquid from incidental sources received at the Facility shall be sent offsite for disposal. No onsite solidification of any PCB liquid from incidental sources shall be conducted at the Facility. Any spillage of PCB liquids shall be collected, tested for PCB concentration and sent offsite to PCB approved facility immediately for disposal. This information shall be provided to the EPA upon request.
4. Water containing PCBs may only be 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 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).
6. Anytime PCB liquids from incidental sources (other than leachate generated on-site) are encountered, these liquids shall be tested for its PCB concentration and flash point prior to being manifested and transported to an authorized facility capable of solidifying the PCB liquid waste. Analytical test results ensuring the liquid does not exceed 500 ppm PCB and is not classified as an ignitable waste shall be provided to any facility it is transported to for documentation. This information shall be provided to the EPA upon request.
7. 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 the EPA provides written approval to do so.
8. 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 the EPA upon request.
9. The Facility shall always during PCB leachate storage and 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.
10. 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 the EPA of their PCB waste activities by filing EPA Form 7710-53, “Notification of PCB Activity,” prior to engaging in PCB waste hauling activities.

11. The landfill shall be operated in accordance with the plan presented in Section 2.8, “Chemical Waste Landfill Operations” of the application dated May 23, 2025. Any modification to this plan shall be submitted to the EPA for review and approval before a new or modified plan may be implemented by the Facility.
12. In 2003, the Facility submitted a request to waive the requirement that bottom of the landfill be 50 feet above the historical high groundwater table, pursuant to 40 CFR § 761.75 (b)(3). This request was granted by EPA R6. Here, EPA has re-evaluated the request. Pursuant to its authority under 40 CFR § 761.75(c)(4), EPA Region 6 waives the hydrologic conditions at 40 CFR § 761.75(b)(3). EPA Region 6 authorizes the bottom of the Toxic Substances Control Act (TSCA) Landfill Cells 3, 4A, 11 and 12 to be less than 50 feet above the historical high-water table. All four cells are constructed with composite liner system consisting of 60-mil high-density polyethylene (HDPE) liner placed over a 36-inch-thick compacted soil layer and are equipped with leachate collection systems designed to monitor and minimize the migration of potential contaminants to groundwater. In addition, groundwater monitoring systems are in place. These cells are underlain by unweathered marl, a formation with extremely low permeability which extends to about 250 feet below grade. Above this is a weathered marl layer that extends from the surface to approximately 10 to 50 feet below grade. While shallow groundwater is present within the weathered marl, it is neither classified as a groundwater resource, nor designated as a major or minor aquifer by the TCEQ. Additionally, a weathered marl is not hydrologically connected to the unweathered marl. Based on these conditions, the EPA has determined that waiving the requirements under 40 CFR § 761.75(b)(3), the operations of the landfill will not present an unreasonable risk of injury to health or the environment from PCB disposal.

B. Surface and Ground Water Monitoring Requirements

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-8D, MW-13R, MW-14C, MW-15, MW-16, MW-22, MW-23R, MW-

24, and MW-29, 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. The analytical laboratory methods used for PCB analysis shall meet the detection limit of 0.5 ppb PCBs.

4. The onsite drainage stream adjacent to and due east of the landfill site shall be sampled and analyzed at least semi-annually for the constituents required in III.B.1. and B.2. after rainfall events 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 five (5) working days of discovery.

C. Sediment Monitoring

The Facility shall conduct sediment monitoring for the onsite drainage system located Northeast (approximately 650 linear feet) of Monitoring Well MW-13R at least annually, with sampling events spaced no less than six (6) months, under provision 40 CFR § 761.75 (c)(3)(ii). The PCB concentrations 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 five (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(s) listed under condition IV. A.

2. Leachate shall be managed in accordance with Section 8, "Leachate Collection," of the application dated May 25, 2025. Any modification to this plan shall be submitted to the EPA 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 § 761.75(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 the 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 § 761.61(a)(5)(iv). The Facility shall keep records of when and where leachate was sent offsite for 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

CSC Landfill shall comply with the requirements in § 761.75(b)(4)(ii), 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 CSC 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 the site operating plan for the CSC Landfill.

IV. AUTHORIZATIONS FOR LEACHATE STORAGE TANKS

A. Units Authorized

1. The 100,000-gallons east 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 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.** The closure plan for the landfill cells dated April 1999, Revised November 1999, is approved for PCB containing cells. 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 closure of leachate collection tank shall comply with the Closure Plan in Appendix V. Any substantial changes to the closure plan shall be approved by the EPA in writing before closure may begin.
- C.** Records required under 40 CFR § 761.180(d) and (f) shall be maintained for the times specified after the landfill is no longer used for PCB disposal.
- D.** The Facility shall notify the EPA Region 6 PCB Coordinator via email that a PCB containing landfill cell is scheduled for closure within 60 days of the anticipated date when closure is to begin, along with the closure plan for the cell(s).
- E.** The Facility shall submit a closure decontamination plan to the EPA Region 6 PCB Coordinator for written approval for the PCB leachate collection tank within 180 days of the planned closure date.
- F.** Upon completion of closure activities, a copy of the certification of final closure required by the TCEQ shall be provided to EPA Region 6.
- G.** Copies of the annually adjusted closure cost estimate and proof of adequate financial assurance for PCB containing cells shall be provided to the EPA Region 6 PCB Coordinator for review and approval.

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

1. The Facility shall correct any adverse impact on the environment resulting from noncompliance with this approval or the release of PCBs into the environment.
2. The 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. The 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. The EPA has reason to believe the approved activities present or may present an unreasonable risk of injury to health or the environment;
 - c. The 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. The EPA issues new regulations or standards that impact conditions of this Approval.

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 the 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:

1. Enter the Facility where PCBs are being handled, stored or disposed;
2. Have access to and copy, at reasonable times, any records that are required to be kept under the TSCA PCB regulations;
3. Inspect any facilities, equipment (including monitoring equipment), practices or operations required under this approval or the TSCA PCB regulations; or
4. 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 the EPA at least thirty (30) days before transferring ownership of the Facility. The Facility shall also submit to the 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 the 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 sections § 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 were completed;
- d. Description of the spill location;
- e. Pre-clean-up 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 official(s) stating that the cleanup levels required by the 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 via email 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 reauthorization six months before the expiration date.

END OF APPROVAL CONDITIONS

APPENDIX I - SUMMARY OF AUTHORIZED UNIT

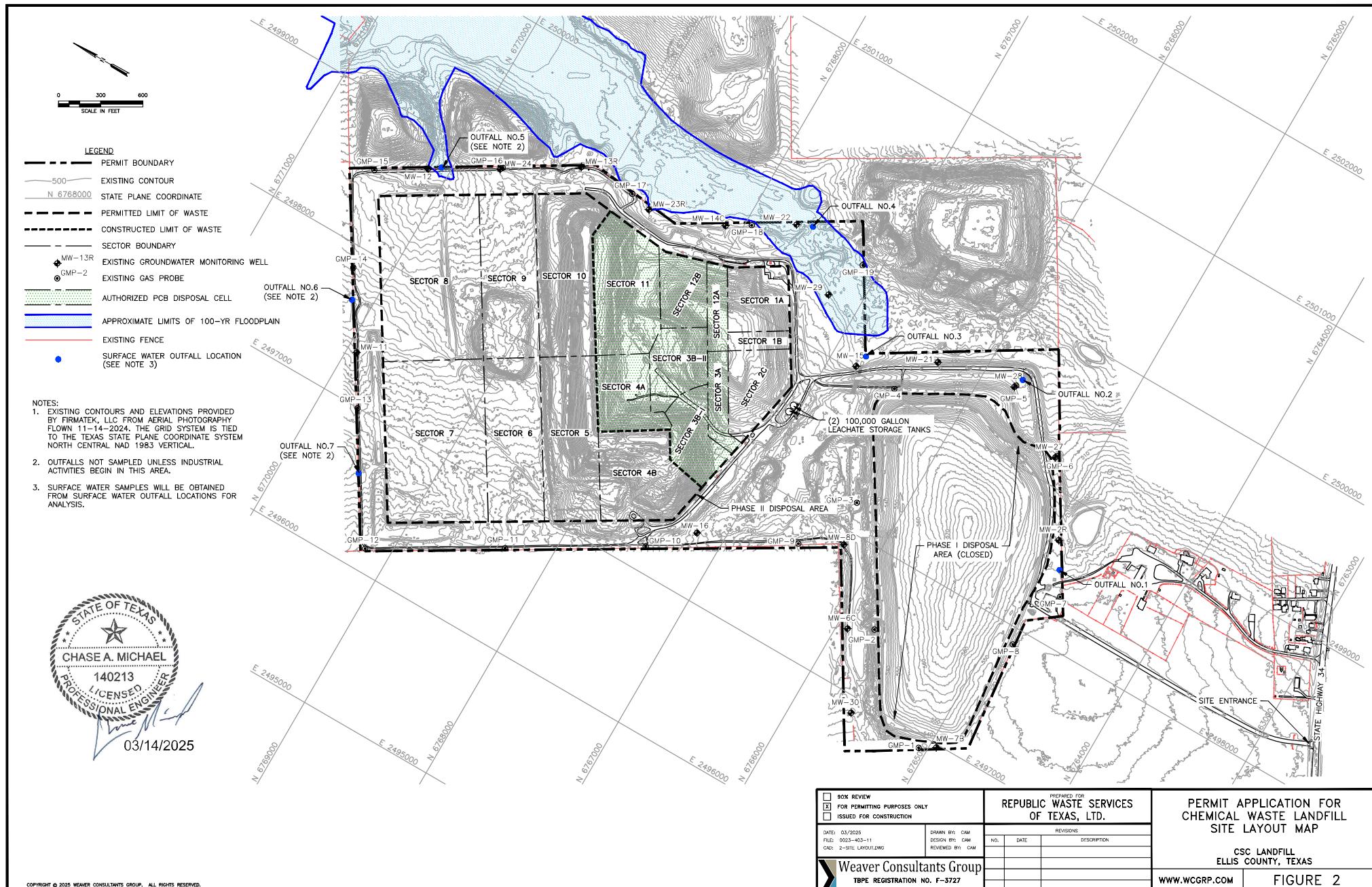
Authorized Unit and Capacity

Authorized Units	Dimension (Feet)	Average Waste Depth (Feet)	Maximum Capacity (Cubic Yards)
Landfill Cell 3	430 x 900	100	2,759,700
Landfill Cell 4A	415 x 530	102	2,223,000
Landfill Cell 11	415 x 930	70	2,284,900
Landfill Cell 12	430 x 710	76	1,959,100

Note:

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

APPENDIX II - SITE PLAN



APPENDIX III - PCB TRAINING AND SPILL CLEAN-UP PLAN

10 PERSONNEL AND ENVIRONMENTAL PROTECTION

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

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

10.1 PCB Safety Training

Employee involved in the management of PCB wastes receives training and instruction on the proper techniques for safety and protection around PCBs. Personal protective gear, such as dust masks and gloves, are worn by personnel involved with placement, inspection, and disposal activities for 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 are trained in the contents of the site operation plan by CSC Landfill personnel. In-house training addresses the following topics:

- Customer notification and load inspection procedures;
- Identification of 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 receive training

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

10.2 Surface and Ground Water Sampling and Analysis

Surface water samples are collected semi-annually after rainfall events from the onsite drainage system adjacent to and due northeast of the landfill site (Figure 2). These samples are analyzed for PCBs, iron, and total suspended solids (TSS).

Groundwater samples from monitoring well MW-8D, MW-13R, MW-14C, MW-15, MW-16, MW-22, MW-23, MW-24, and MW-29 are sampled and analyzed semi-annually for pH, PCBs, specific conductance, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). Specific details regarding groundwater monitoring can be found in the Groundwater Sampling and Analysis Plan (GWSAP) for the CSC Landfill facility.

10.3 Spill Control Methods

Vehicles transporting PCB wastes to CSC 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 CSC'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 right-of-way consistent with §330.145.

In the event of an accident or spill that involves PCB-contaminated waste at the facility, but outside the approved disposal area, CSC 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 the waste can be safely reloaded, it is taken directly to the landfill working face for proper disposal. If any spills involving PCB wastes bound for CSC occur within two miles of the landfill, EPA Region VI, TCEQ Region 4, and the Executive Director of the TCEQ will be notified, and cleanup assistance will be provided as needed by CSC. 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, CSC will contact a licensed spill clean-up contractor to perform the cleanup operation.

11 RECORDKEEPING AND DOCUMENTATION

11.1 PCB Waste Inspections and Records

All PCB wastes received at CSC must 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 must 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 must be provided to CSC. All records and documents are maintained at CSC in either a physical or electronic format.

11.1.1 PCB Liquid Inspections

All inspections of PCB items for free-flowing liquids must 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 PCB item inspected including serial numbers or markings that discretely identify the PCB item; and
- How the CSC facility inspector verified that no free-flowing liquids were present in each PCB Item to be disposed.

11.1.2 Leachate Sampling Results

Leachate sampling is performed by a third party contractor and analyzed by an independent contractor, but results of these analyses and the method used are kept on file in the site operating record at CSC. Records are also kept regarding when and where the leachate was disposed.

11.1.3 Paint Filter Test Results

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

11.1.4 PCB Storage and Disposal Logs

All PCB wastes are logged showing the date removal for disposal and the date the PCB or PCB item was disposed of in a landfill cell. The location of the PCB wastes disposed of within the landfill cells are recorded and kept in the site operating record.

11.2 Surface and Ground Water Monitoring Results

All procedures and methods used for surface water and groundwater monitoring are recorded along with the data. Monitoring records are maintained and kept in the site operating record. The procedures in the CSC Groundwater Sampling and Analysis Plan (GWSAP) are followed for groundwater sampling. Surface water (storm water) monitoring is conducted in accordance with procedures in the CSC facility's storm water pollution prevention plan.

11.3 PCB Spill Cleanup Records

Following each spill cleanup action, CSC develops and maintains records of the cleanup. The records 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-clean-up sampling data used to establish spill boundaries if required because of 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-clean-up 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.

APPENDIX IV - WASTE ACCEPTANCE PLAN



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



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: _____

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: EPA8082 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 _____

State Fee Applicable Class I Yes No

Date _____

State Fee Applicable MSW Yes No

Additional Information _____

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

APPEND.X V - CLOSURE POST - CLOSURE PLAN

**CSC DISPOSAL AND LANDFILL, INC.
ELLIS COUNTY, TEXAS
TNRCC MSW PERMIT NO. 1209B**

PERMIT AMENDMENT APPLICATION

PART III - SITE DEVELOPMENT PLAN ATTACHMENT 12 FINAL CLOSURE PLAN

Prepared for

Republic Services, Inc.

April 1999

Revised November 1999

Approved Site Development Plan, April 19, 2000

Prepared by

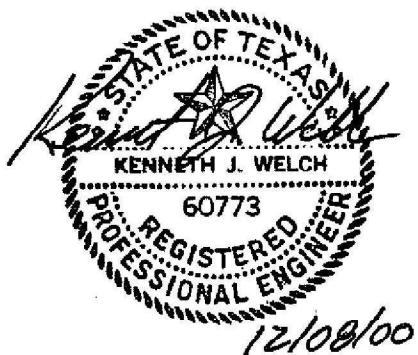
EMCON
5701 East Loop 820 South
Fort Worth, Texas 76119
817/478-8254

Project 794465



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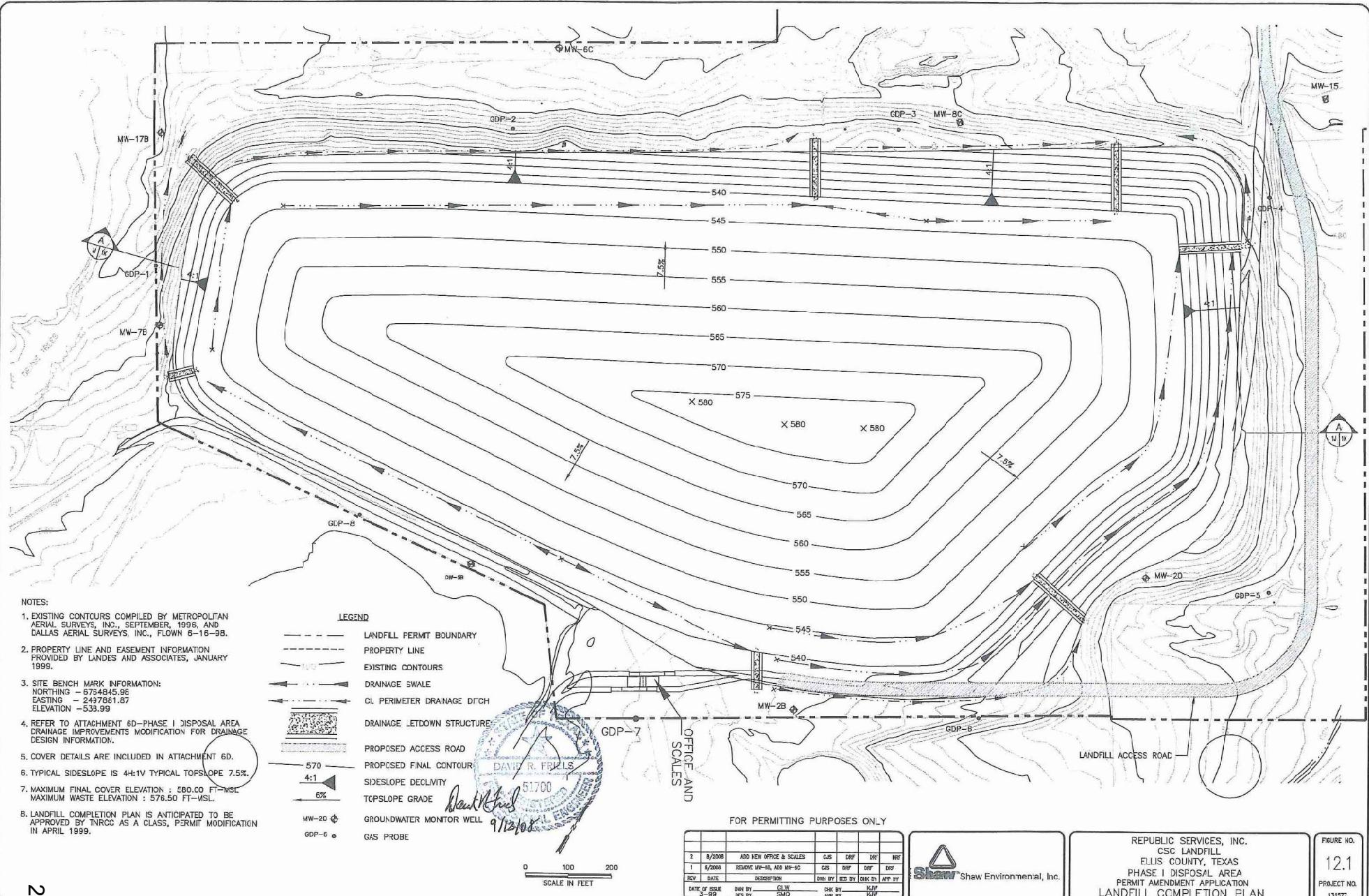
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1 INTRODUCTION

This Final Closure Plan has been prepared for the CSC Disposal and Landfill, Inc. (CSC Landfill) consistent with 30 TAC §330.56(l). The landfill completion plan for the CSC Landfill consists of final contours and drainage features for the completed landfill. This plan is provided in Part III, Attachment 7A - Phase I Disposal Area Landfill Completion Plan, and Attachment 7B - Phase II Disposal Area Landfill Completion Plan, and is reproduced in this attachment as Figure 12.1 (page 12-2) and Figure 12.2 (page 12-3), respectively.



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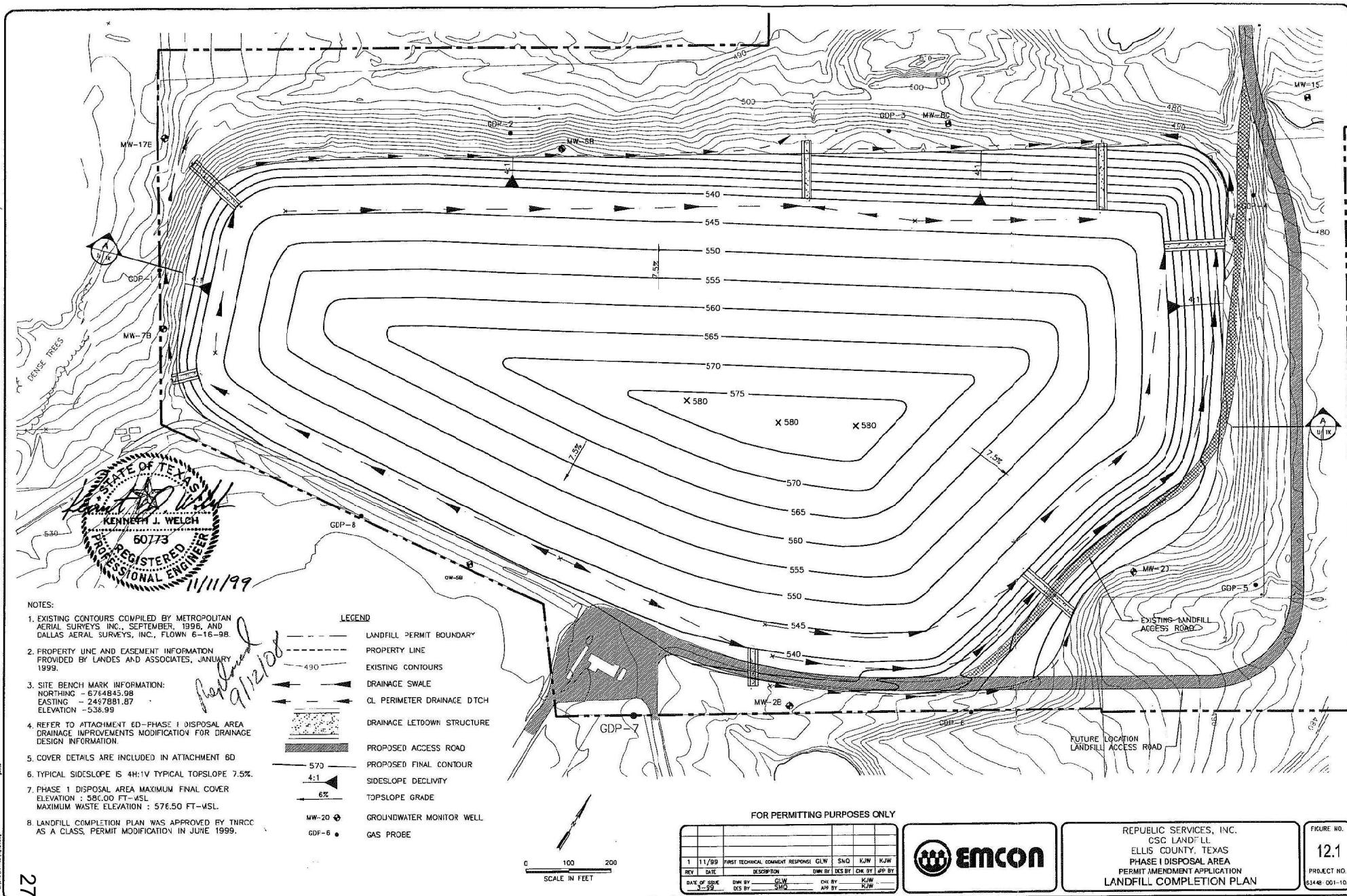
FOR PERMITTING PURPOSES ONLY

2	8/2008	ADD NEW OFFICE & SCALES	CJS	DRF	DRF
1	8/2008	REMOVE MW-1B, ADD MW-1C	CJS	DRF	DRF
REV	DATE	DESCRIPTION	DRW BY	REC BY	CHK BY
			APP		
	DATE OF ISSUE	DRW BY	GLW	CHK BY	KJW
		REC BY	SMQ	APP BY	KJW



REPUBLIC SERVICES, INC.
CSC LANDFILL
ELLIS COUNTY, TEXAS
PHASE I DISPOSAL AREA
PERMIT AMENDMENT APPLICATION
LANDFILL COMPLETION PLAN

FIGURE NO.
12.1
PROJECT NO.
131577



2

IMAGE

1/2 9

FOR PERMITTING PURPOSES ONLY

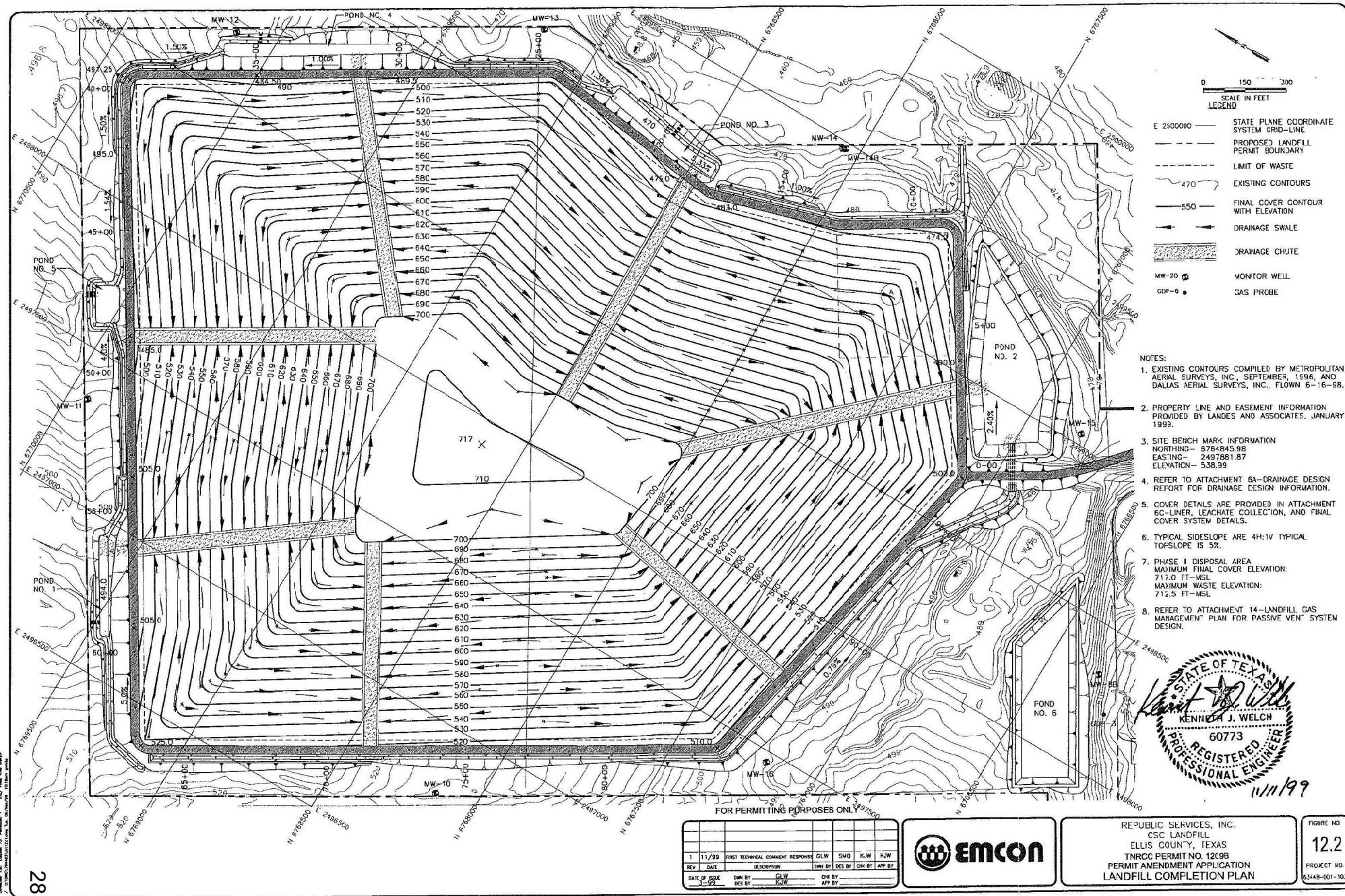
1	11/99	FIRST TECHNICAL COMMENT RESPONSE		GLW	SNO	KJW	KJW
REV	DATE	DESCRIPTION		DMW BY	DCS BY	CHB BY	APP
		DATE OF ISSUE	DMW BY	GLW	DMW	KJW	KJW
1P-99		DCS BY	SMO		APP BY	KJW	

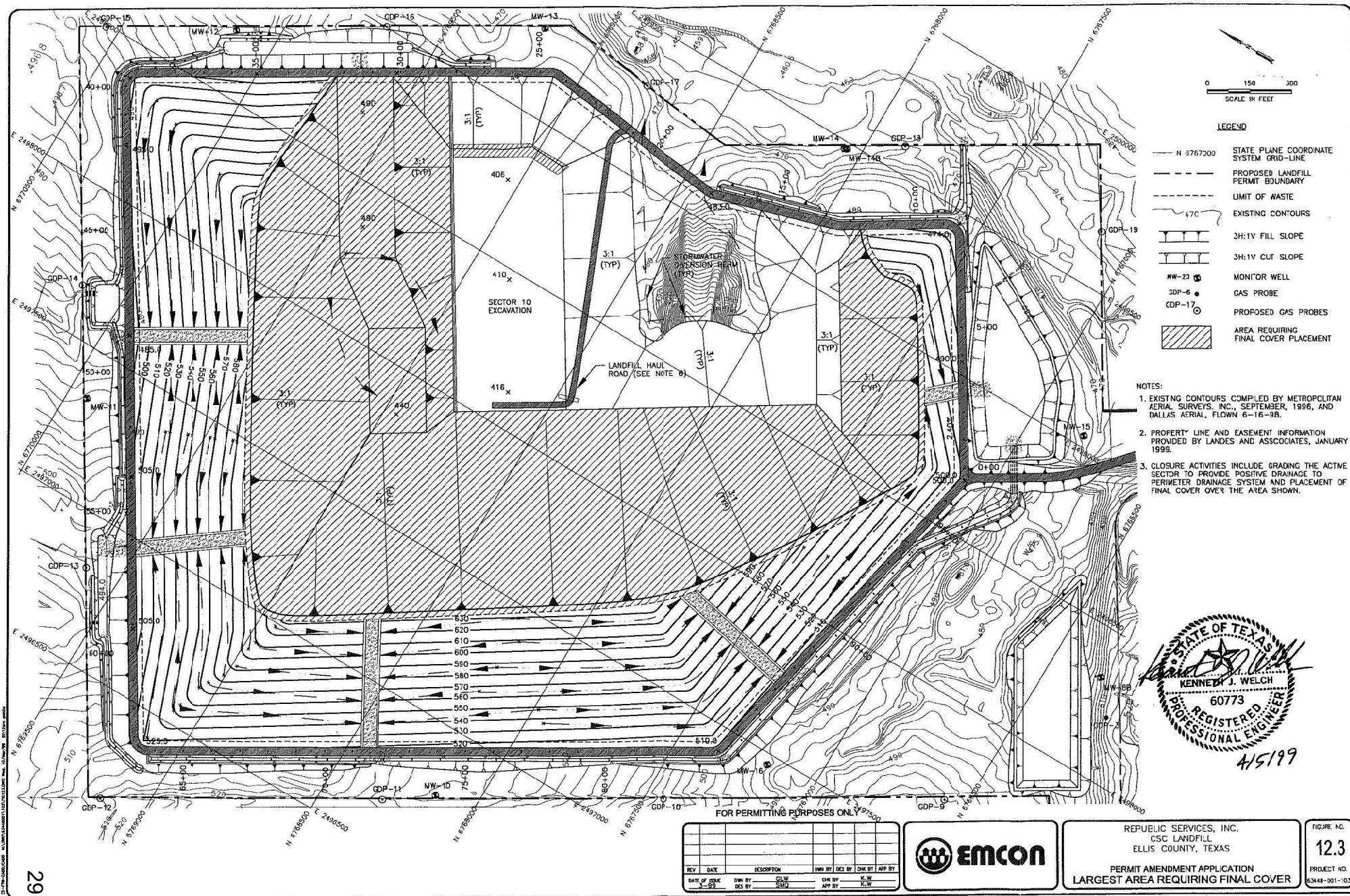


REPUBLIC SERVICES, INC.
CSC LANDFILL
ELLIS COUNTY, TEXAS
PHASE I DISPOSAL AREA
PERMIT AMENDMENT APPLICATION
LANDFILL COMPLETION PLAN

FIGURE NO.

12.1
PROJECT NO.
63448-001-103





REV.	DATE	DESCRIPTION	OWN BY	DES BY	CHG BY	APP BY
3-199	3-199	DATE OF ISSUE	GW	SDU	KW	PLW



2 FINAL COVER SYSTEM

2.1 Introduction

The final cover system for the CSC Landfill was developed to incorporate the requirements of §330.253(b)(1) and (3). The rules state that within 180 days of the last receipt of waste, 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 multi-layer cover system and a stormwater runoff control system. The stormwater runoff controls for the Phase II disposal area are addressed in Part III, Attachment 6A - Drainage Design Report. The final cover system design for the Phase II disposal area is detailed in Part III, Attachment 6C.4 - Final Cover System Details. The stormwater runoff controls and final cover system design for the Phase I disposal area are addressed in a permit modification anticipated to be approved in 1999 and are included as Attachment 6D - Class I Permit Modification for Drainage Improvements.

2.2 Cover System Design

Separate final cover systems have been designed for the Phase I and Phase II disposal areas.

2.2.1 Phase I Disposal Area

The multilayer final cover system for the Phase I disposal area will provide a low maintenance cover and reduce rainfall percolation through the cover system, thereby minimizing leachate generation within the landfill. The final cover system and landfill completion plan for Phase I has been approved by TNRCC as a Class 1 permit modification. A copy of this permit modification is included in Part III - Attachment 6D. As depicted on Figure 12.1, 7.5 percent top slopes, and 4H:1V side slopes are provided to minimize erosion and facilitate drainage of the Phase I disposal area. The Phase I disposal area consists of pre-Subtitle D lined areas and a Class 1 nonhazardous industrial waste disposal area. Components of the multilayer final cover system include (from top to bottom):

- A 12-inch-thick erosion layer consisting of earthen material (top 6 inches capable of sustaining plant growth). The vegetation layer will be native or introduced grasses capable of providing 95 percent coverage over the cover system.
- A geotextile filter fabric on the top slope and a drainage geocomposite layer on the side slope to facilitate drainage above the FMC for the Class 1 disposal area.
- A 40-mil, smooth (top slope) and textured (side slope), LLDPE, or engineer-approved equivalent geomembrane for the side slope for the Class 1 disposal area.
- An 18-inch-thick infiltration layer with a coefficient of permeability less than or equal to 1×10^{-5} cm/sec for the Class 1 disposal area.
- An 18-inch-thick infiltration layer with a coefficient of permeability less than or equal to the bottom liner permeability for the pre-Subtitle D lined areas.

The 12-inch-thick erosion layer for Phase I is provided based on the original permit for Phase I of the CSC landfill. The erosion layer was evaluated using the USLE developed by the United States Department of Agriculture. The evaluation is presented in Part III, Attachment 6D - Class 1 Permit Modification for Drainage Improvements. The low permeability components of the final cover system (the geomembrane and the 18-inch-thick clay infiltration layer) are designed to minimize infiltration of surfacewater into the underlying waste material. Landfill gas control systems are discussed in Part III, Attachment 14 - Landfill Gas Management Plan.

2.2.2 Phase II Disposal Area

The multilayer final cover system for the Phase II disposal area will provide a low maintenance cover and reduce rainfall percolation through the cover system, thereby minimizing leachate generation within the landfill. As depicted on Figure 12.2, 5 percent top slopes and 4H:1V side slopes are provided to minimize erosion and facilitate drainage of the Phase II disposal area. Components of the multilayer final cover system include (from top to bottom):

- A 24-inch-thick erosion layer consisting of earthen material (top 6 inches capable of sustaining plant growth). The vegetation layer will be native or introduced grasses capable of providing 95 percent coverage over the cover system (TxDOT seeding specifications are included in Part III, Attachment 6A - Drainage Design Report).

- A geotextile filter fabric on the top slope and a drainage geocomposite layer on the side slope to facilitate drainage above the FMC.
- A 40-mil, smooth (top slope) and textured (side slope), LLDPE or engineer-approved equivalent geomembrane.
- An 18-inch-thick infiltration layer with a coefficient of permeability less than or equal to 1×10^{-5} cm/sec.

The 24-inch-thick erosion layer for Phase II is provided to minimize the erosion potential of the final cover slopes and encourage a drought resistant stand of grasses. The erosion layer was evaluated using the USLE developed by the United States Department of Agriculture. The evaluation is presented in Part III, Attachment 6A (Appendix 6A-D - Erosion Layer Evaluation). The low permeability components of the final cover system (the geomembrane and the 18-inch-thick clay infiltration layer) are designed to minimize infiltration of surfacewater into the underlying waste material. Landfill gas control systems are discussed in Part III, Attachment 14 - Landfill Gas Management Plan.

2.3 Installation Methods and Procedures

2.3.1 Construction Procedures

The final cover system will be constructed consistent with §330.253(b)(1) and (b)(3). Details of the final cover design section are shown in Part III, Attachment 6C.4 - Final Cover System Details and in Attachment 6D - Class 1 Permit Modification for Drainage Improvements. In general, appropriate field survey controls will be implemented to control the final lift of solid waste as well as the successive soil layers of the final cover system (see Part IV - Site Operating Plan). The cover will consist of the layers as described in Section 2.2 of this attachment. The infiltration layer will be a relatively homogeneous clayey soil, placed and compacted under controlled moisture-density conditions with appropriate compaction equipment. The lift thickness will be controlled so that there is no penetration through the loose lift under compaction into the top of the previously compacted lift. The finished surface of the infiltration layer will be a hard and uniform surface. A geomembrane will be installed over the soil infiltration layer. A drainage layer consisting of a drainage geocomposite will be required under the surficial erosion layer to enhance stability. The drainage geocomposite will consist of a geotextile heat-bonded to both sides of an HDPE geonet.

The erosion layer will be placed directly over the drainage geocomposite. The surface of the erosion layer will be seeded and mulched as necessary to establish a vegetative cover. Vegetation will be established such that a minimum 95 percent coverage of native and introduced grasses is provided.

2.4 Final Cover Testing Procedures

Testing and evaluation of the final cover system during construction and reporting of results will be consistent with §330.253(f). The 18 inches of compacted infiltration material will be tested for coefficient of permeability at a frequency of at least one test per surface acre of final cover. Other testing (e.g., standard Proctor, Atterberg Limits, moisture content, and density) will be conducted, as appropriate, to provide control and verification during construction of the final cover. Construction quality control for the geomembrane will be performed according to methods approved by the engineer. These methods will incorporate recommendations from the manufacturer, installer, and owner.

TNRCC will be contacted prior to construction of final cover to determine the current requirements for testing and construction of final cover systems.

3 CLOSURE PROCEDURES

3.1 Sequence of Final Cover Placement

The CSC Landfill will construct final cover throughout the active life of the landfill. Final cover will be constructed over the Phase I disposal area once final grades are reached. As detailed in Part III, Attachments 1D through 1F - Sector Development Plans, final cover will be placed in increments as Phase II of the site is developed. The final cover placement procedure listed below will be followed until all sectors have been closed.

- Survey controls will be implemented to control the filling of solid waste to the bottom of the daily/intermediate cover layer elevation.
- The final cover system layers will be constructed. Testing of the various components of the final cover system will be performed in accordance with this closure plan (see Section 2.4 of this attachment).
- A final cover certification report, complete with an as-built survey, will be prepared by an independent registered professional engineer and submitted to the TNRCC.
- The final cover certification report will be maintained in the site operating record and the final cover log (see Part IV - Site Operating Plan, Section 4.18.6 - Cover Application Log) will be updated to reflect the area where final cover has been placed. The TNRCC 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. Requirements for final closure of the site are discussed in Section 4 of this attachment. In addition, postclosure care activities will not begin until the entire site has been closed as discussed in Section 4.

3.2 Closure During Active Life

As described above, the final cover will be constructed as fill areas achieve the design contours. 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, a revised final closure plan will be developed and submitted to the TNRCC for approval.
- During the first growing season following application of final cover, the site will be vegetated with appropriate grasses to minimize erosion. The established grasses will provide a minimum of 95 percent coverage of the final cover system.
- A surfacewater management system will be constructed to minimize erosion.
- A closure certification will be prepared by an independent registered professional engineer and submitted to TNRCC for approval.
- All proper notices and documentation will be filed with the appropriate agencies.

3.2.1 Estimate of Largest Area Ever Requiring Final Cover

The largest filled area without final cover during the active life of the landfill is the active working face in Sector 9 of Phase II requiring final cover construction. In this scenario, approximately 54 acres will require the construction of final cover. The largest area ever requiring final cover under the assumed forced closure scenario is shown on Figure 12.3.

In addition, the entire 297-acre site would also need to be administratively closed. Supporting calculations were previously presented in Part III, Attachment 8 - Cost Estimate for Closure and Postclosure Care, Appendix 8A.

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 37.3 million cubic yards. Supporting calculations are included in Part III; SDP Narrative, Appendix IIIA - Site Life Calculations.

4 CLOSURE SCHEDULE

4.1 Final Closure Requirements

The site will be closed in an orderly fashion, consistent with §330.253(e), implementing the following steps:

- No later than 45 days prior to initiation of final closure activities for the MSW landfill unit, the executive director of the TNRCC will be notified 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 final closure activities for the MSW landfill unit, 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. CSC Landfill will also make available an adequate number of copies of the approved final closure and postclosure plan at the landfill office for public access and review.
- Following notification of the executive director of the TNRCC, a minimum of one sign will be posted at the main entrance 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 dumping of solid waste at the facility.
- Final closure activities will commence at each landfill unit no later than 30 days after the date the MSW landfill unit receives the known final receipt of wastes. If the MSW landfill unit has remaining capacity and there is a reasonable likelihood that the MSW landfill unit will receive additional wastes, final closure activities will commence no later than one year after the most recent receipt of wastes.
- Final closure activities of the MSW landfill unit will be completed in accordance with this Final Closure Plan within 180 days following the beginning of closure.

- Following completion of final closure activities, a documented certification, signed by an independent registered professional engineer, will be submitted to the TNRCC for review and approval. This certification will verify that final closure has been completed in accordance with this Final Closure Plan and will include all applicable documentation necessary for certification of final closure. Once approved, this application will be placed in the operating record.
- Within 10 days after completion of final closure activities of the facility, a certified copy of an Affidavit to the Public (most recent format provided by the TNRCC will be used) will be submitted to the TNRCC and placed in the 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 Part III, Attachment 13 - Postclosure Care Plan. Within ten days after completion of final closure activities of the facility, a certified copy of the modified deed will be submitted to the TNRCC and placed in the operating record.

Following receipt of the required final closure documents and an inspection report from the TNRCC district office verifying proper closure of the MSW landfill facility according to this Final Closure Plan, 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 12.4 - Final Closure Schedule.

4.2 Provisions for Extending Closure Period

If the CSC Landfill has remaining capacity at the time of the last receipt of waste, 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 CSC Landfill has taken all steps necessary to prevent threats to human health and the environment.

Closure activities will be completed within 180 days following the initiation of final closure activities. If necessary, a request for an extension of the completion of final closure activities will be submitted to the executive director for approval. 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.

CSC Landfill
Figure 12.4 Final Closure Schedule

	30 DAYS										
Written notification of closure to TNRCC											
Public notice of facility closure published in newspaper											
Posting of sign											
Initiation of final closure activities											
Time interval for commencement of final closure activities											(Max)
Submit engineering certification of final closure to TNRCC											
Submit certified copies of Affidavit to the Public and modified deed to TNRCC											
Note: Schedule is based on anticipated date of beginning final closure activities. Heavy vertical line signifies final receipt of waste.											

5 CLOSURE COST ESTIMATE

A detailed written cost estimate, in current dollars, showing the cost of hiring a third party to close the largest area of the landfill ever requiring a final cover at any time during the active life of the unit is provided in Part III, Attachment 8 - Cost Estimate for Closure and Postclosure Care. Closure costs for the CSC Landfill are presented in Appendix 8A.

During the active life of the unit, CSC Landfill, will annually adjust the closure cost estimate for inflation within the 60 days prior to the anniversary date of the establishment of the financial instruments. The adjustment may be made by recalculating the maximum costs of closure in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the United States Department of Commerce in its survey of current business. The inflation factor is the result of dividing the latest published annual deflator by the deflator for the previous year. The first adjustment will be made by multiplying the closure cost estimate by the inflation factor. The result is the adjusted closure cost estimate. Subsequent adjustments will be made by multiplying the latest adjusted closure cost estimate by the latest inflation factor.

An increase in the closure cost estimate and the amount of financial assurance provided will be made if changes to the final closure plan or the landfill conditions increase the maximum cost of closure at any time during the remaining active life of the unit.

A reduction in the closure cost estimate and the amount of financial assurance provided may be submitted if the previously approved cost estimate exceeds the maximum cost of closure at any time during the remaining life of the unit. CSC Landfill, will provide written notice to the executive director of the situation that includes a detailed justification for the reduction of the closure cost estimate and the amount of financial assurance. A reduction in the cost estimate and financial assurance is considered a Class I permit modification and will be handled as such.

**CSC DISPOSAL AND LANDFILL, INC.
ELLIS COUNTY, TEXAS
TNRCC MSW PERMIT NO. 1209B**

PERMIT AMENDMENT APPLICATION

**PART III - SITE DEVELOPMENT PLAN
ATTACHMENT 13
POSTCLOSURE CARE PLAN**

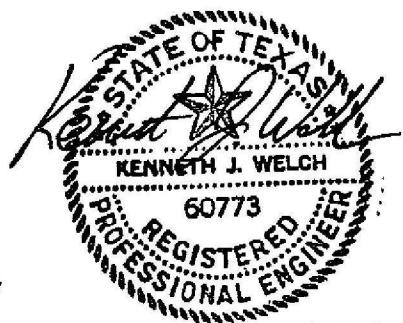
Prepared for

Republic Services, Inc.

April 1999

Revised November 1999

Approved Site Development Plan, April 19, 2000



Prepared by

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5701 East Loop 820 South
Fort Worth, Texas 76119
817/478-8254

Project 794465

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1 INTRODUCTION

This postclosure care plan has been prepared for CSC Disposal and Landfill, Inc., (CSC Landfill) consistent with 30 TAC §330.56(m). The landfill completion plan for this site consists of final contours and drainage features as depicted in Part III, Attachment 7A - Phase I Disposal Area Landfill Completion Plan and Attachment 7B - Phase II Disposal Area Landfill Completion Plan.

2 POSTCLOSURE CARE ACTIVITIES

2.1 Monitoring and Maintenance

In accordance with §330.254(b), postclosure care maintenance will commence immediately upon completion of final closure requirements set forth in Part III, Attachment 12 - Final Closure Plan. Postclosure care maintenance will continue for a period of 30 years unless the TNRCC approves a postclosure care period of a different duration. Postclosure care maintenance will consist, at a minimum, of the following requirements to be carried out by CSC Landfill:

- Retain the right of entry and maintain all rights-of-way to the closed landfill.
- Conduct site inspections a minimum of semiannually after closure.
- Conduct maintenance and/or remediation activities, as needed, in order to maintain the integrity and effectiveness of the final cover, site vegetation, and drainage control systems. Vegetation shall be maintained on the final cover to provide a minimum of 95 percent coverage.
- Manage surfacewater runoff and runoff in order to minimize the erosion of the final cover system.
- Correct the effects of settlement, subsidence, ponded water, erosion, or other events or failures determined to be detrimental to the integrity of the closed landfill.
- Maintain and operate the LCS in accordance with §330.200 and §330.201 and the EPA's Design Criteria (i.e., less than one foot of leachate over the liner, or approved equivalent design). CSC Landfill, reserves the right to submit a demonstration to the TNRCC that leachate will no longer pose a threat to human health and the environment. If the demonstration is approved by the TNRCC, CSC Landfill, will be allowed to discontinue the maintenance and operation of the LCS.

- Maintain the groundwater monitoring system in accordance with §330.230 through §330.242 and monitor groundwater in accordance with Part III, Attachment 11 - Groundwater Sampling and Analysis Plan. However, CSC Landfill, reserves the right to request TNRCC approval of 1) an alternative monitoring frequency, and 2) an alternative list of parameters to be monitored. Such requests will be based on supporting data available at the time of the request.
- Monitor the landfill perimeter LFG monitoring system in accordance with §330.56(n). In accordance with §330.56(n)(2)(B), the minimum monitoring frequency will be quarterly. However, CSC Landfill, reserves the right to request TNRCC approval of an alternate monitoring frequency. Such a request will be based on supporting data available at the time of the request.
- If applicable, maintain and operate the LFG collection and/or control system in accordance with applicable regulations.

2.2 Decreasing Postclosure Care Period

The length of the postclosure care maintenance period may be decreased by the TNRCC if CSC Landfill, submits a documented certification signed by an independent registered professional engineer. The certification will include all applicable documentation demonstrating that the reduced period is sufficient to protect human health and the environment. Applicable documentation may include data from monitoring of groundwater, surfacewater, leachate levels, and landfill gas. The certified documentation must be reviewed and approved by the TNRCC prior to decreasing the length of the postclosure care maintenance period.

2.3 Increasing Postclosure Care Period

The length of the postclosure care maintenance period may be increased by the TNRCC if it is determined that the increased duration is necessary to protect human health and the environment. It is understood that CSC Landfill, will receive appropriate notification of any such proposed changes prior to the TNRCC's final determination.

2.4 Completion of Postclosure Care Period

Upon completion of the postclosure care maintenance period, CSC Landfill, will submit to the TNRCC documented certification, signed by an independent registered professional engineer, verifying that postclosure care maintenance has been completed in accordance with this Postclosure Care Plan. The submittal will include all documentation necessary

for certification of completion of postclosure care maintenance. The certification will be placed in the site operating record upon approval.

3 PERSON RESPONSIBLE FOR CONDUCTING POSTCLOSURE CARE ACTIVITIES

At the time of development of this document, the following person is responsible for the management of this landfill:

Robert G. Vickery
General Manager
CSC Disposal and Landfill, Inc.
Republic Services, Inc.
P.O. Box 236
Avalon, Texas 76623

(972) 627-3413

If the landfill was closed and was to start postclosure care as of the date of this permit application submittal, Mr. Vickery would be responsible for postclosure care. The person responsible for conducting postclosure care activities is subject to change. However, as part of the closure notification to TNRCC, as required by §330.253(e)(2), CSC Landfill, will notify the TNRCC regarding the responsible person. Postclosure care monitoring and maintenance activities will be conducted as described in Section 2.1 of this attachment.

4 POSTCLOSURE LAND USE

4.1 Intended Use

There are no current planned uses for the CSC Landfill after closure. Should use of the closed landfill be considered, plans will be prepared and submitted to the TNRCC for review and approval.

4.2 Constraints on Postclosure Construction

There are no current plans to construct buildings or other structures on the closed CSC Landfill. Nevertheless, any future construction activities on the closed landfill will be subject to the provisions of §330.255, which require, among other things, prior approval of the TNRCC.

5 POSTCLOSURE CARE COST ESTIMATE

A detailed written cost estimate, in current dollars, of the cost of hiring a third party to conduct postclosure care activities for the MSW unit, in accordance with the Postclosure Care Plan, is provided in Attachment 8 - Cost Estimates for Closure and Postclosure Care. Cost estimates for postclosure care for the CSC Landfill are presented in Appendix 8B.

During the active life of the unit, CSC Landfill, will annually adjust the postclosure care cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument. The adjustment may be made by recalculating the maximum costs of postclosure care in current dollars, or by using an inflation factor derived from the most recent Implicit Price Deflator for Gross National Product published by the United States Department of Commerce in its survey of current business. The inflation factor is the result of dividing the latest published annual deflator by the deflator for the previous year. The first adjustment will be made by multiplying the postclosure care cost estimate by the inflation factor. The result is the adjusted postclosure care cost estimate. Subsequent adjustments will be made by multiplying the latest adjusted postclosure care cost estimate by the latest inflation factor.

An increase in the postclosure care cost estimate and the amount of financial assurance will be made if changes in the postclosure care plan or the unit conditions increase the maximum costs of postclosure care.

A reduction in the postclosure care cost estimate and the amount of financial assurance may be submitted if the cost estimate exceeds the maximum costs of postclosure care remaining over the postclosure care period. CSC Landfill, will provide written notice of the detailed justification for the reduction of the postclosure care cost estimate and the amount of financial assurance to the executive director. A reduction in the cost estimate and financial assurance is considered a Class I permit modification and will be handled as such.

12 PCB LEACHATE STORAGE TANK AND SOLIDIFICATION AREA CLOSURE PLAN

12.1 Introduction

This Closure Plan addresses information regarding the previously decommissioned clay lined PCB solidification pits and closure procedures for the PCB leachate storage tanks.

12.2 Previously Decommissioned PCB Solidification Area

CSC Landfill was previously authorized to solidify PCB waste in steel tanks or alternatively clay lined pit(s) located over the waste mass. The current reauthorization request does not seek approval for solidification of PCB waste.

Steel tanks were never used at CSC Landfill for solidification purposes, however, between the years 2008 and 2012 solidification of PCB waste occurred in a clay lined pit located over Sector 1A. In 2012, the clay lined solidification pit was decommissioned per the previously approved solidification area closure plan. Bulking agents were removed, the pit was washed down, any remaining solidified waste was transferred to a landfill cell authorized to accept PCB waste for disposal, the clay pits were filled with soil, and the area was re-graded to promote positive drainage.

12.3 PCB Leachate Storage Tank Closure Procedure

The CSC landfill has two existing 100,000-gallon, HDPE-lined, dual contained leachate storage tanks. The west tank is being used for non-PCB leachate while the east tank contains leachate from the PCB disposal area.

Upon conclusion of post-closure care activities at the CSC Landfill, leachate contained within the PCB leachate storage tank will be emptied and transferred to a facility authorized to dispose of PCB liquid waste. The tank will then be decommissioned and will also be disposed of in an authorized PCB waste disposal facility. The EPA will be notified following successful decommission of the PCB leachate storage tank.

APPENDIX VI - SITE OPERATING AND CONTINGENCY PLAN

**CSC LANDFILL
ELLIS COUNTY, TEXAS
TCEQ MSW PERMIT NO. 1209B**

PART IV SITE OPERATING PLAN

Prepared for

Republic Waste Services of Texas, Ltd.

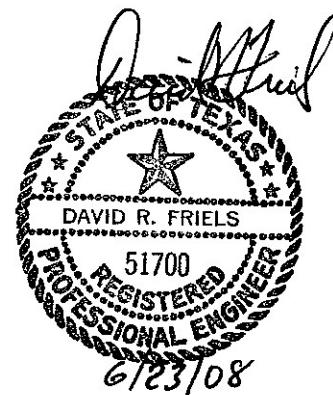
Revised October 2005

Revised January 2006

Approved April 24, 2006

Revised February 2008

Revised June 2008



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Alternative Daily Cover Operating Plan

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LIST OF ACRONYMS

ADC - Alternative Daily Cover
ADCOP - Alternative Daily Cover Operating Plan
CFR - Code of Federal Regulations
DOT - Department of Transportation
EPA - U.S. Environmental Protection Agency
FMLER - flexible membrane liner evaluation report
FWS - U.S. Fish and Wildlife Service
LCS - leachate collection system
LFG - landfill gas
MSW - Municipal Solid Waste
MSDS - Material Safety Data Sheets
msl - mean sea level
NRACM - nonregulated asbestos-containing material
OSHA - Occupational Health and Safety Administration
PCBs - polychlorinated biphenyls
RACM - regulated asbestos-containing material
RCRA - Resource Conservation Recovery Act
SDP - site development plan
SLER - soils and liner evaluation report

LIST OF ACRONYMS (Continued)

SOP - site operating plan

TAC - Texas Administrative Code

TCEQ -Texas Commission on Environmental Quality

TxDOT - Texas Department of Transportation

WWTP - wastewater treatment plant

1 INTRODUCTION

This SOP has been prepared for the CSC Landfill, consistent with 30 TAC §330.65. The CSC Landfill is a Type I municipal solid waste management facility. The purpose of this SOP is to provide guidance to site management and operating personnel for the day-to-day operation of the facility. This document 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 on site throughout the facility's life.

2 PERSONNEL AND TRAINING

2.1 Personnel

The general manager is responsible for overall facility management and is designated as the contact person for regulatory compliance matters. This person is responsible for assuring that adequate personnel and equipment are available to provide facility operation in accordance with the SDP and the TCEQ regulations. See Figure 2.1-Organizational Chart for the proposed personnel organization. The general manager must have a minimum of five years of applicable solid waste management experience.

Under the general direction of the landfill general manager, the landfill operations manager (site manager) is responsible for daily operations, administers the facility's SDP, and serves as the emergency coordinator. The site manager will maintain a Class A solid waste license. The site manager must have a minimum of five years in landfill operations.

The gate attendant, stationed at the site entrance, is primarily responsible for maintaining complete and accurate records of vehicles and solid waste entering the facility. The gate attendant is trained in site safety procedures, to visually check for unauthorized wastes, to measure vehicles, and to collect waste disposal fees. The gate attendant will also identify the waste load as either municipal solid waste or Class 1 Industrial Waste and direct the solid waste transportation vehicle to the proper active working face. Minimum qualifications for the gate attendant are high school graduate or GED and 2 years experience at an MSW or similar facility with experience as a gate attendant. The gate attendant will obtain training in waste screening.

Equipment operators are responsible for the safe operation of the equipment they operate. 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 are also responsible for maintenance, construction, litter abatement, and general site cleanup. The equipment operators intervene as necessary to prevent accidents and report unsafe conditions immediately to the site manager. Minimum qualifications for equipment operators are previous experience operating heavy equipment and the demonstrated ability to operate landfill equipment used on site.

Other site personnel or laborers may be employed from time to time in categories such as maintenance, construction, litter abatement, and general site cleanup. Laborers must be qualified to perform manual labor tasks that would be assigned including litter

pick-up and other duties. The Site Manager will evaluate the qualifications of potential laborers.

During night operations a minimum of one landfill foreman, one scale operator and two equipment operators will operate the site; however, more personnel may be added if waste volume increases during night hours.

Proper lighting of the working faces, the scale house and security gates will address night operation safety issues. The CSC Landfill will comply with applicable Federal, state, or local worker health and safety issues.

2.2 Training

The landfill general manager, site manager, load inspectors, equipment operators, and gate attendant are trained in the contents of this SOP by CSC Landfill personnel. In-house training will address the following topics:

- Customer notification and load inspection procedures
- Identification of hazardous wastes, PCB wastes not authorized for disposal by USEPA, and other prohibited wastes
- Waste handling procedures (acceptable and prohibited wastes)
- Health and safety
- Fire safety
- Record keeping

Documentation of training is placed in the site operating record. Selected equipment operators, load inspectors, and other personnel receive training at TCEQ sponsored or approved training courses, as deemed appropriate by the landfill general manager.

2.2.1 Additional Training Guidelines

Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of the Site Operating Plan. All onsite personnel will receive initial training and annual updates on the general items listed under 2.2 as well as emergency procedures listed below and implementation of the contingency plan for this site.

The training will be directed by the site manager or qualified designee trained in waste management procedures, and will include instruction that teaches facility personnel waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. The training program will ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with

emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment;
- communications or alarm systems;
- response to fires or explosions;
- response to ground-water contamination incidents;
- shutdown of operations;
- litter control
- management of methane gas safety procedures
- litter control
- methane gas safety procedures

Facility personnel must successfully complete the training program within six months after the effective date of these regulations or six months after the date of their employment or assignment to a facility, or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the specified training requirements.

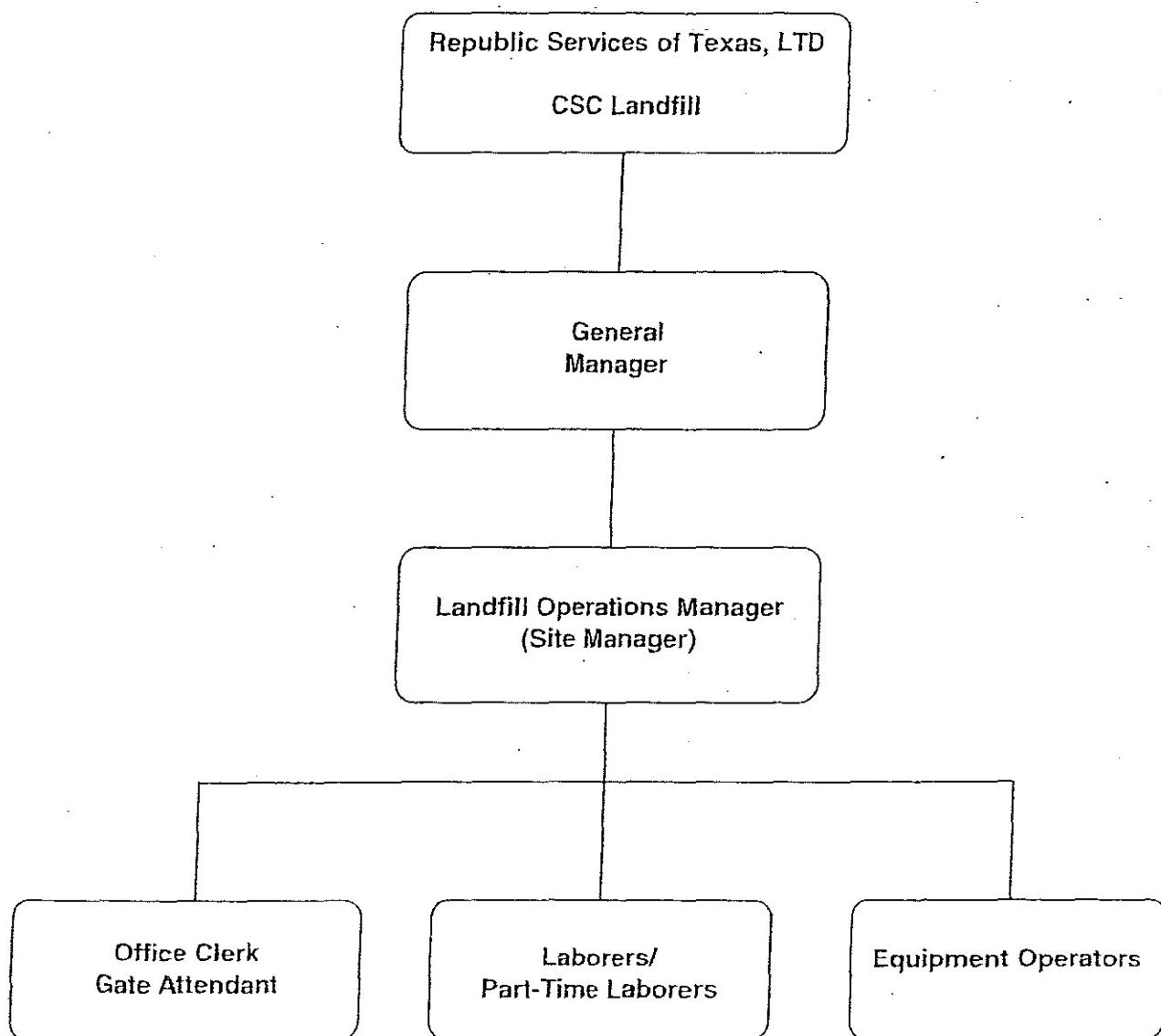
Facility personnel must take part in an annual review of their initial training.

The Site Manager must maintain the following documents and records at the facility:

- the job title for each position at the facility related to waste management, and the name of the employee filing each job;
- a written job description for each position listed under paragraph (1) of chapter 335.586(a). This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education, or other qualifications, and duties of employees assigned to each position;
- records that document that the required training or job experience has been given to, and completed by, facility personnel.

Training records on current personnel must be kept until closure of the facility and training records on former employees must be kept for at least three years from the date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

Figure 2.1
Organizational Chart



3 EQUIPMENT

The following list of equipment is routinely 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 is provided as required for increasing volumes of incoming solid waste. Other equivalent types of equipment may be substituted on an as-needed basis. The equipment and gate house are equipped with fire extinguishers.

Table IV-3.1
Typical Equipment List*

Equipment Description	Type/Size	No. of Units**
Landfill Compactor	CAT826 or Similar Heavy Duty	1-2
Earth Movers(excavators, dump trucks or scrapers)	20-40 CY	1
Loaders	Various	1
Dozer	D6, D8 or Similar	1
Motor Grader	Various	1
Pumps	Various	1
Pick-up Trucks	Various Makes	1
Maintenance Truck	Various Makes	1
Water Truck	(2,000 gallon)	1
Portable Lights	Portable Light Stand	1

* Number of units is the minimum amount required to effectively manage the incoming waste volumes based on the annual waste acceptance rate of 800 to 3800 tons per day.

The compactor is used for spreading and compacting the refuse and also for compacting the cover material. The scraper is typically used for excavating both the cover material used in site operations and the future disposal areas. Dozers are used for excavation and general earthwork functions. Excavators and dump trucks will be utilized to excavate and haul cover material. The motor grader is typically used for road maintenance, ditching, surface-water control, and final grading of the completed fill areas. The water truck is used for dust control and moisture conditioning of soil materials as necessary. The maintenance truck is used to provide service to the other site operating vehicles. In the event of equipment breakdown, similar equipment will be leased from one of the local equipment suppliers that regularly provide equipment and services to CSC Landfill, or similar equipment will be obtained from other Republic sites within the region.

4 OPERATIONAL PROCEDURES

4.1 Access Control

Access to the landfill is limited to the gated site entrance located approximately 0.6 mile north of the intersection of State Highway 34 and FM 55, north of Avalon, Texas. The gate attendant controls access and monitors all vehicles entering and exiting the site.

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 chain link fence and gate at the entrance. The perimeter fence and gate are inspected twice monthly. Repairs and maintenance are performed as necessary. Refer to Section 4.24 of this SOP for site inspection and maintenance schedule. "No Trespassing" signs are posted at the site property line.

The site entrance is secured by a gate that is monitored by the gate attendant during site operating hours. Outside operating hours, the gate to the site is locked.

Entry to the active portion of the site is restricted to designated personnel, approved waste haulers, and properly identified persons whose entry is authorized by site management. Visitors are allowed on the active area only when accompanied by a site representative.

In case of a breach to the access control for the site, the TCEQ regional office will be notified within 24 hours, unless the breach can be permanently repaired within eight hours. The breach will be temporarily repaired within 24 hours of detection. Notification will include a schedule for completion of the permanent repair.

4.1.2 Traffic Control

Access to the landfill site is provided via State Highway 34, northeast of Avalon, Texas. Vehicular traffic to the landfill generally accesses the site using State Highway 34. The entrance has a gate that is attended during operating hours by the gate attendant. The gate attendant restricts site access to authorized vehicles and directs these vehicles appropriately.

Solid waste transportation vehicles are directed to appropriate fill areas by signs located along the landfill haul road and access road. The signs will identify the municipal solid waste active working face, the Class 1 Industrial Waste active working face, and liquid waste solidification area. These vehicles deposit their loads and depart the site. No private or commercial solid waste vehicles are allowed access to any areas other than the active portion of the landfill. Site personnel provide traffic directions as necessary to facilitate safe movement of vehicles.

Within the site, signs are placed along the landfill haul road and access road at a frequency adequate for users to be able to understand where disposal areas are and which roads are to be used.

4.2 Unloading Wastes

Trained personnel monitor all incoming waste on the trucks. Trained personnel will be at the unloading areas to monitor incoming loads of waste. These personnel are familiar with the rules and regulations governing the various types of waste that can or cannot be accepted into this facility, including knowledge of §330.171. The personnel also have a basic understanding of both industrial and hazardous waste and their transportation and disposal requirements. An active working face for municipal solid waste, Class 1 Industrial Waste and liquid waste for solidification, will be clearly identified by directional signs. Solid waste dumping is controlled to prevent disposal in locations other than those specified by site management. Any waste deposited in an unauthorized area is promptly removed and disposed of properly at the current working face. Working face monitors have authority and responsibility to reject unauthorized loads or have unauthorized material removed by the transporter, and or assess surcharges, and have material removed or otherwise properly managed by CSC personnel. Control is also used to confine all of the working face to a minimum area consistent with the rate of incoming waste, while allowing for safe and efficient operation. The maximum size of the unloading areas is approximately 20,000 sf for the Class 1 area, and 30,000sf for the MSW unloading area. A separate municipal solid waste working face may be established for a small vehicular traffic to ensure safe and efficient operations. A record of unauthorized material removal will be maintained in the operating record

Any prohibited waste that is not discovered until after it is unloaded is returned to the vehicle that delivered the waste. That party is responsible for the proper disposal of this rejected waste. In the event the unauthorized waste is not discovered until after the vehicle that delivered it is gone, the waste is segregated and controlled as necessary. An effort is first be made 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, the general manager will notify the TCEQ and seek guidance on appropriate measures for disposition of the waste.

Signs with directional arrows and portable traffic barricades help to restrict traffic to designated disposal locations. Signs are placed along the access route to the current disposal area or other designated disposal areas. In addition, rules for waste disposal and prohibited waste are prominently displayed on signs at the site entrance. This facility does not have separate brush or C & D area..

4.3 Hours of Operation

The facility is authorized for operation 24 hours per day, 7 days per week. The approved operating hours include both waste acceptance and operating hours when materials and equipment will be moved on and off the site. The general manager or designee will inform the TCEQ in writing of the planned hours of operation, if different from 24 hours per day, 7 days per week.

4.4 Site Signs

A readable sign is displayed at the entrance to the site. This sign measures 4 feet by 4 feet, and has lettering 3 inches in height that state the name of the site, type of site, hours and days of operation, and the TCEQ permit number, an emergency 24-hour contact number for the site manager or authorized designee with the authority to obligate the facility at all times that the facility is closed and the local emergency fire department phone number.

Within the site, signs are placed along the landfill haul road and access road at a frequency adequate for users to be able to understand where disposal areas are and which roads are to be used. Control of Windblown Wastes and Litter

4.5 Control of Windblown Wastes and Litter

Windblown wastes are controlled by the following methods.

- Waste transportation vehicles using this facility are required to use adequate covers or other means of containment. The adequacy of covers or containment of incoming wastes is checked at the facility entrance. A sign is prominently displayed at the facility entrance stating that all loads shall be properly covered and that a surcharge will be placed on all vehicles without adequate cover.
- Daily cover is applied as frequently as needed to assist with the control of windblown waste.
- The facility provides litter control fences, as necessary, at appropriate locations near the working face and elsewhere. The litter control fence is located as close as practical to the active area.
- As part of the overall site maintenance program, facility personnel collect windblown waste materials that have accumulated throughout the site, on fences and gates, and onsite access roads on a daily basis when the facility is in operation.
- Adjacent filled areas provide protection from the prevailing winds. Earth berms are used to assist in control of windblown wastes by providing a windbreak

against prevailing winds. Due to the variability of wind direction, the site operators use their discretion in using any additional wind breaks.

4.6 Easements and Buffer Zones

4.6.1 Easements

In accordance with §330.141, solid waste unloading, storage, disposal, or facility operations do not occur within any easement or right-of-way that crosses the site. No solid waste disposal occurs within 25 feet of the centerline of any utility line or pipeline easement, unless otherwise authorized by the TCEQ. All easements are clearly marked as specified in Section 4.7 of this SOP. Utility and pipeline easements are marked with posts extending a minimum of 6 feet above ground surface at intervals that do not exceed 300 feet.

4.6.2 Buffer Zones

The buffer zone for the fill area is generally located between the permit boundary and the inside edge of the perimeter road. No solid waste unloading, storage, disposal, or processing operations occurs within any buffer zone. As shown in Part III, Attachment 1A - General Site Plan, the buffer zones vary around the perimeter of the site, but in no case are they less than 50 feet. All buffer zones are clearly marked as specified in Section 4.7 of this SOP. The buffer zone will be maintained to provide for safe passage of firefighting and other emergency vehicles.

4.7 Landfill Markers and Benchmark

Landfill markers are installed to clearly mark significant features as described in §330.143(b). Markers and benchmarks are maintained so they are clearly visible. The markers are steel or wooden posts (or other TCEQ approved material) and extend 6 feet above the ground surface unless otherwise noted below. The markers are not obscured by vegetation and are placed in sufficient numbers to clearly show the required boundaries. Markers that are removed or destroyed are replaced within 15 days of their removal or destruction. Landfill markers are inspected monthly and are maintained and repaired as necessary. Landfill markers will be repaired or replaced within 15 days of discovering the marker does not meet regulatory requirements. Inspection records will be maintained at the facility. Refer to Section 4.24 of this SOP for site inspection and maintenance schedule. Markers are repainted as needed to retain visibility. Guidelines for type, placement, and color coding of markers are outlined below.

- Site Boundary - Site boundary markers are painted black. The markers are placed at each corner of the site and along each boundary line at intervals no greater than 300 feet. Fencing is placed within these markers as required. In areas where the fence is located on the permit boundary, the fence posts are painted black and used as site boundary markers.

- Buffer Zone - Buffer zone markers are painted yellow. The markers are placed along each buffer zone boundary at intervals of 300 feet. The buffer zones are a minimum of 50 feet wide.
- Easements and Rights-of-Way - Easement and right-of-way markers are painted green. The markers are placed along the centerline of an easement and along the boundary of a right-of-way, at each corner within the site, and at the intersection of the permit boundary. Where it is impractical to place a marker, the marker is offset from the easement right-of-way and the offset distance will be clearly painted on the marker.
- Landfill Grid System - Grid markers are painted white. The grid system will consist of lettered markers along two opposite sides, and numbered markers along the other two sides. Markers are spaced no greater than 100 feet apart measured along perpendicular lines. Where feasible, intermediate markers are installed where markers cannot be seen from opposite boundaries. Alternately, a 2-inch diameter pipe placed over steel T-posts is used for grid markers. At a minimum, grid markers delineate the area expected to receive waste within the next 3 years. The grid markers are maintained during the active life of the site and throughout the postclosure period.
- SLER/FMLER area - SLER/FMLER markers are painted red. The markers are placed so that all areas for which a SLER/FMLER has been submitted and approved by the TCEQ are readily determinable. Such markers provide site workers immediate knowledge of the extent of approved disposal areas. These markers are located so that they are not destroyed during operations until operations extend into the next SLER/FMLER. The location of these markers is tied into the landfill grid system and is reported on each SLER/FMLER submitted. SLER/FMLER markers will not be placed inside the evaluated areas.
- 100-Year Flood Limits - Floodplain markers are painted blue. The markers are installed to depict the 100-year flood boundary of Big Onion Creek and its unnamed tributaries. The posts are placed a maximum of 300 feet apart.

A permanent benchmark has been established at the site in an area that is readily accessible and is not used for disposal. The benchmark is a bronze survey marker stamped with elevation and survey date and set in concrete. The location of the permanent benchmark is identified in Part III, Attachment 1A - General Site Plan.

4.8 Control of Waste Spilled on Route to the Site

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. These steps are necessary to prevent the escape of any part of the load by blowing or spilling. The landfill general manager is responsible for the cleanup of waste materials spilled along and within the right-of-way of all public access roads serving the site for a distance of 2 miles in either direction from the entrance to the site. Cleanup for the spilled materials is performed on a daily 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 §330.145.

4.9 Disposal of Large Items

A large item/white goods storage area will be established if incoming waste volumes of white goods and large items that cannot be incorporated into the regular spreading, compacting and cover operations are significant enough to require a separate storage area. These items are recycled as demand warrants. Recycled items will be removed from the site frequent enough to prevent nuisance conditions and discharge of any pollutants. Large items that are not recycled are disposed of at the working face. Care is taken during disposal of large items to ensure that: (1) large items are not placed directly on the protective cover, (2) large items are placed such that they do not interfere with continued waste filling, and (3) that other, smaller municipal solid waste is placed and compacted around them (see subsection 4.17 of this SOP). Refrigerators, freezers, air conditioners, and other items containing chlorinated fluorocarbon (CFC) will be handled in accordance with 40 CFR §82.156(f).

Refrigerators, Air Conditioners or other items containing CFC refrigerant will not be accepted unless CFC refrigerant has been captured from the unit and sent to an approved CFC disposal site or recycled. The generator must provide certification that the CFC has been evacuated from the unit prior to acceptance or disposal.

4.10 Air Quality Control

Measures to control air pollution include, but are not limited to, the following items:

- Open burning of waste is not permitted at this facility.
- Incoming waste is promptly landfilled.
- Freshly landfilled waste is promptly covered with daily cover.
- Ponded water at the site is controlled as detailed in Section 4.19 of this SOP.
- Accidental fires are controlled as outlined in Section 6 of this SOP.

In addition to these general items that will control odors the following additional measures will be taken to minimize odors from potential sources at the landfill:

Leachate collection and removal of leachate is accomplished with a direct connection to the sanitary sewer. This minimizes potential odors associated with leachate disposal.

Liquid wastes including sludges and other potentially odiferous wastes will be processed upon receipt and buried as soon as solidification is completed.

Other wastes that the gate attendant identifies as significant odor producing materials will be directed to the working face along with instructions to the operator for quick burial.

In the event that objectionable odors occur on site, the following procedures will be implemented.

- Identify source of odor
- Eliminate through burial and cover if possible
- Employ alternative measures to alleviate problem including, additional cover, cleanup of processing areas, leachate removal or other methods that may eliminate the objectionable odors

The landfill general manager ensures that the municipal solid waste facility does not violate any applicable requirement of the approved State Implementation Plan developed under the Clean Air Act, Section 110, as amended (see Part III, Attachment 14 - Landfill Gas Management Plan for more information).

4.11 Disease Vector Control

The need for vector control (control of rodents, flies, mosquitoes, etc.) is minimized through daily site operations, which include the application of daily, intermediate, and final cover. The extent of the working face is also minimized. Site operators make daily checks for insects and rodents and report problems to the landfill general manager. If necessary, a licensed professional applies pesticides to ensure that proper chemicals are used and that they are properly applied.

4.12 Site Access Roads

Onsite and nearby offsite roads will be maintained in a clean and safe condition and cleared of litter and debris on a daily basis. Litter and other debris will be taken to the working face on a daily basis. In order to minimize depressions, ruts, and potholes, access roads will be regraded as necessary or at minimum every two months.

The accumulation of mud during inclement weather is expected to be limited to the vicinity of the active fill area. Tracked mud and associated debris at the access to the facility on the public roadway will be removed at least once per day on days when mud and associated debris are being tracked onto the public roadway. Onsite roads will be constructed of crushed rock or equivalent materials, allowing accumulated mud to be thrown from tires before trucks reach public roadways. These internal access roads provide all weather access to disposal areas including the wet weather area. All weather access to the site from Hwy 34 is provided by the main site entrance road which is a .4 mile long concrete roadway.

Fugitive dust emissions are minimized through proper operating procedures, which may include spraying site roads with uncontaminated surface water or commercial dust suppressants.

4.13 Salvaging and Scavenging

Salvaging is not allowed to interfere with prompt sanitary disposal of solid waste or to create public health nuisances. Salvaged materials are considered as potential recycled materials. Salvaged items are removed from the site often enough to prevent the items from becoming a nuisance, to preclude the discharge of pollutants from the area, and to prevent an excessive accumulation of the material at the site. Class I Industrial waste and special wastes received at the site are not salvaged. Pesticide, fungicide herbicide and rodenticide containers will not be salvaged unless through a state supported recycling program. Scavenging is prohibited at all times.

4.14 Endangered Species

Based upon the Threatened and Endangered Species Inventory performed at this landfill site, this facility and operation will not result in the destruction or adverse modification of critical habitat of endangered or threatened species or cause or contribute to the taking of any endangered or threatened species. Detailed information regarding endangered species in accordance with §330.61(n) and §330.551 is provided in Appendix I/IIC - Wetlands Delineation and Threatened and Endangered Species Inventory.

4.15 Control of Landfill Gas

The control and monitoring of LFG for the proposed CSC Landfill is in accordance with Part III, Attachment 14 - Landfill Gas Management Plan. The Landfill Gas Management Plan is developed in accordance with §330.63. The gas management plan provides for inclusion of applicable documentation in the site operating record, and for submittal to the TCEQ's executive director.

4.16 Treatment of Abandoned Oil and Water Wells

Neither abandoned water wells nor abandoned crude oil or natural gas wells are known to exist on the facility. However, should any such wells be encountered the following will apply: Within 30 days of discovery of any water wells, the facility manager will provide written notification to the TCEQ's executive director of their location and written certification 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 and any additional requirements imposed by the executive director. A copy of the well plugging report required to be submitted to the appropriate state agency will also be submitted to the executive director within 30 days after the well has been plugged.

Within 30 days of discovery of any existing or abandoned crude oil wells, natural gas wells, or other wells associated with mineral recovery that are under the jurisdiction of the Railroad Commission of Texas, the facility manager will provide the executive director of the TCEQ a written notification of their location. Within 30 days of after plugging the well, the facility manager will provide written certification to the TCEQ's executive director that the well has been capped, plugged, and closed in accordance with the applicable rules and regulations of the Railroad Commission of Texas.

The facility operator will submit a permit modification identifying any proposed changes to the liner installation plan as a result of any well abandonment.

4.17 Compaction of Solid Waste

Compaction of incoming waste provides more efficient use of available space and reduces the amount of settling after the fill is complete. Compaction of the waste is accomplished by a landfill compactor or similar equipment. Adequate compaction is accomplished to minimize future consolidation and settlement and provide for the proper application of intermediate and final cover. The incoming waste is spread in layers and compacted by making repeated passes over the waste with compaction equipment.

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

4.18.1 Soil Management

Management of soil for use in and around the landfill area is an ongoing process at the facility. In general, soil for use as daily cover, intermediate cover, final cover, and other uses is available adjacent to the active area. This onsite soil is obtained from excavation that is ongoing as part of the initial development of future landfill cells. This onsite material is available within a few hundred feet of the working face (the exact distance varying daily, weekly, etc., depending on the exact stage of development). If at any time during site operations additional soil is required other than that available from the adjacent future cell excavation, material is taken from a soil borrow area located on CSC Landfill property.

4.18.2 Daily Cover

Daily cover of waste is necessary to control disease vectors, windblown waste, odors, fires, scavenging, and to promote runoff from the fill area. At the end of each working day (or at least once every 24 hours when the landfill operates on a 24-hour basis), at least 6 inches of soil cover material that has not been previously mixed with garbage, rubbish, or other solid waste, or an approved ADC material, is placed over all solid waste received during that same day. An ADC Operating Plan (ADCOP) is included in Appendix IV A of this SOP. The plan addresses the following items:

- Description and thickness of the alternative cover material

- Effect of ADC on vectors, fires, odors, and windblown litter
- Operational methods to be utilized at the site when using the ADC
- Chemical composition of the material and the MSDS(s) for the ADC

ADC is used to cover waste except when the landfill is to be closed for a period greater than 24 hours or an alternate period approved by the TCEQ. ADC is only used in areas that are surrounded by the containment berm. This allows collection of runoff generated by an area covered with ADC to be contained and handled as contaminated water.

If soil is used as daily cover, the minimum thickness is 6 inches. To ensure that the daily cover soil is adequate (i.e., minimize vectors, contaminated storm-water runoff, odors, etc.) the following procedures are followed:

- The daily cover is sloped to drain.
- The daily cover is compacted with a minimum of two passes with the dozer tracks to minimize infiltration of storm water, graded to drain, and does not have any waste visibly protruding through it.
- The site manager documents where daily cover has been placed and visually inspects 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 site manager documents, on a daily basis, the daily cover placement area and indicates that he has visually verified the thickness and condition in the Cover Application Log (discussed further in section 4.18.6 of this SOP).
- After each rainfall event, the site manager inspects all daily cover areas for erosion, exposed waste or other damage, and repairs as necessary. Runoff from damaged or eroded areas is handled as contaminated water until repairs are completed.
- The site manager inspects for seeps from daily cover. All seepage water from waste below the daily cover is controlled by placement of soil berms and diverted to the contaminated water collection area. Contaminated water is treated as outlined in Part III, Attachment 15 - Leachate and Contaminated Water Plan.

Inactive areas with 6 inches of daily cover is inspected weekly for erosion, ponded water, seeps, protruding waste, or other detrimental conditions that may cause contaminated runoff from the daily cover. After a period of 180 days, an additional 6 inches of earthen material not previously mixed with garbage, rubbish or other solid waste is placed over the daily cover for a total of not less than 12 inches of cover. This 12-inch-thick layer of cover soil is classified as "intermediate cover" as described in section 4.18.3 of this SOP. Once the area becomes active again, the top 6 inches are 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 are covered with an additional 6 inches of well compacted cover material, for a total cover thickness of at least 12 inches. The intermediate cover is graded and maintained to prevent ponding. The top 6 inches of intermediate cover will be capable of sustaining vegetative cover and will be seeded to prevent erosion. Grass growth and other erosion control measures will be maintained.

Details of the fill and cover placement sequencing are included in Section 7 of this SOP as a general procedural guideline. The sequence of intermediate cover placement with respect to waste placement and construction of new lined areas is included in detail in Part III, Attachment 1 - Site Layout Plans. The site manager inspects intermediate cover at the site on a weekly basis. Erosion gullies or washed-out areas are promptly repaired within five days of detection by grading, compacting, and seeding unless the commission's regional office approves otherwise.

4.18.4 Clay Separation Cover Over Class 1 Waste

In areas where Class 1 Industrial Waste is to be disposed of, in accordance with 30 TAC §330.173 and Section 4.21 - Disposal of Industrial Waste of the SOP, a minimum of four feet of compacted clay-rich soil will be placed above the final lift of Class 1 waste. Municipal solid waste will be placed above the four-foot clay layer and Class 1 Industrial Waste to meet the final contours for waste. Final cover, in accordance with 30 TAC §330.451, 330.465, will be placed over the final municipal solid waste lift.

4.18.5 Final Cover

Final cover placement will occur in areas of the site filled to capacity. Closure of individual areas will be in accordance with the Closure Plan (Part III - Attachment 12 - Closure Plan) and will permit ongoing landfilling operations to continue until the time of final closure. The surface will be managed throughout the active life of the site to minimize infiltration of water into the filled areas and to minimize contact with solid waste. Final Cover will be inspected weekly as described in Table IV -4.1 – Site Inspection and Maintenance Schedule on page IV – 23.

4.18.6 Cover Application Record

Throughout the landfill operation, a cover application record is maintained and is readily available for inspection in accordance with §330.165(h). For intermediate cover, daily cover, and alternative daily cover, the record specifies the area covered (by use of the grid system), how it was placed, and date it was completed (i.e., leaving no exposed waste). For final cover, the record shows the cover area, date placed and thickness of cover placed on that date. Each entry is certified by the signature of the site manager that the work was accomplished as stated in the record.

As soon as practicable after significant rainfall events (i.e., 4 inches or more of rainfall in 24 hours), the General Manager or landfill supervisor will inspect intermediate and final cover areas for erosion gullies or washed out areas or other damage. Erosion rills or gullies or wash outs deeper than approximately 4 inches will be repaired as soon as practicable, but not later than five days after detection. Periodic inspections and restorations will be required during the operational life and for the post-closure maintenance period. Repairs are documented in the appropriate cover record. The cover inspection record will document the inspections and repairs made to final or intermediate cover. The date of detection of erosion and date of completion of repairs, including reasons for any delays shall be documented in the cover inspection record.

4.19 Prevention of Ponded Water

Site grading and maintenance minimize the ponding of water over areas containing waste. Should ponding occur, the water is removed and the depressions filled within seven calendar days of occurrence, weather permitting. If the ponded water has come into contact with waste, leachate, or waste-contaminated soils, it is treated as leachate and handled in accordance with Part III, Attachment 15 - Leachate and Contaminated Water Plan.

Ponding of water will be controlled at the landfill through a program of routine inspection, maintenance and removal. Weekly inspections of the daily, intermediate and final cover will include identification of any areas that may have settled to allow ponding of water. Identified areas will be regraded as needed to promote proper drainage. Intermediate and final cover areas will be reseeded if necessary to prevent erosion.

4.20 Disposal of Special Wastes

Special wastes as defined by §330.3 are accepted at the facility in accordance with §330.171 and Appendix IVB - Special Waste Acceptance Plan. Receipt of the following special wastes will not require written authorization for acceptance provided the waste is handled in accordance with noted provisions for acceptance:

- Health care related materials
- Dead animals
- Regulated asbestos-containing materials
- Nonregulated asbestos-containing materials
- Empty pesticide, herbicide, fungicide or rodenticide containers
- Conditionally exempt small quantity generator waste
- Sludges, grease trap waste, grit trap waste or liquid waste from municipal sources

In accordance with 30 TAC §330.171, acceptance of any special wastes that are not identified in this permit as acceptable wastes requires prior written approval from the executive director. Requests for approval of these special wastes shall include the following information:

- A complete description of the chemical and physical characteristics of the waste, statement regarding Class I status, and expected quantity or rate of disposal
- An operational plan containing the proposed handling procedures and personal protective equipment that employees should use and any necessary emergency equipment
- Contingency plan outlining responsibility for containment and cleanup of accidental spills

4.20.1 Health Care Related Facilities

Special wastes from health care facilities may be accepted without written authorization if treated in accordance with §330.1201-1217.

4.20.2 Dead Animals

The site may receive dead animals or slaughter house waste that is delivered to the site independent of other wastes. Dead animals or slaughter house waste will be buried and covered with a minimum of 3 feet of solid waste or a minimum of 2 feet of soil immediately upon receipt.

4.20.3 Regulated Asbestos-Containing Material (RACM)

RACM may be accepted at the facility in accordance with §330.171(c)(3). The General Manager will dedicate a specific area of the site for receipt of RACM and notify the TCEQ in writing of the designated area. The current dedicated RACM disposal area comprises Phase II of CSC Landfill (see Drawing 1A). The General Manager will also prepare a contingency plan in case of ruptured bags and designate appropriate personnel for implementation of the contingency plan. As the operation continues, the General Manager will notify the TCEQ in writing of any new dedicated areas for RACM.

RACM disposal locations will be identified by survey (Registered Professional Land Surveyor) and identified on a current site drawing at the site. 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.

Delivery of RACM will be coordinated with the general manager 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. At a minimum, the RACM will be placed at least 20 feet away from exterior final side slopes, 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, and that arrives at the facility will be disposed of in accordance with §330.173(c) or in accordance with this section of the Site Operating Plan.

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.

4.20.4 Nonregulated Asbestos-Containing Material (non-RACM)

Non-RACM may be accepted provided the waste is placed on the active working face and covered in accordance with Section 4.18 of the SOP. Material containing non-RACM will not be placed on any surface or roadway that 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 Empty Pesticide, Herbicide, Fungicide, or Rodenticide Containers

Containers for pesticides, herbicides, fungicides, or rodenticides may be accepted for disposal provided the containers are empty when received, have been triple-rinsed prior to receipt and have been rendered unusable prior to or upon receipt. Such containers will be placed on the active working face and covered at the end of the same day.

Containers for which triple-rinsing is not feasible or practical, may be disposed of at the working face as an industrial waste in accordance with §330.173.

4.20.6 Conditionally Exempt Small Quantity Generator (CESQG) Waste

CESQG wastes may be accepted at the facility in accordance with applicable regulations. The General Manager reserves the right to exclude such wastes. CSC landfill will not accept more than 220 pounds of CESQG waste per month per generator.

4.20.7 Sludges, Grease Trap Wastes, Grit Trap Wastes or Liquid Wastes from Municipal Sources

Wastewater treatment plant sludges, water treatment plant sludges, grease and grit trap wastes, and similar municipal source wastes may be accepted at the facility provided the material passes the Paint Filter test (Method 9095 of "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" EPA Publication No. SW-846) and is certified to contain no free liquids.

Treatment or processing of sludges, grease/grit trap wastes, and similar materials, including solidification, bulking or dewatering, will be accomplished at the facility in accordance with the approved Solidification Acceptance Plan included as Appendix IVC.

4.21 Disposal of Industrial Waste

Nonhazardous industrial wastes are accepted at the facility in accordance with 30 TAC §330.173. Typical Class 1 wastes accepted at this facility include but are not limited to: Contaminated Soils, Sludges and Slurries, Waste containing Liquids, PCBs and other solid waste materials. This section of the SOP, and Appendices IVB – Special Waste Acceptance Plan, IVC – Solidification Acceptance Plan, IVD – EPA Authorization for Disposal of PCB Wastes, contain the requirements for the acceptance and proper management of Class 1 Industrial Solid Wastes. A facility contingency plan prepared in accordance with §335.589 is included in section 8 of the SOP. Hazardous industrial wastes are not accepted for disposal at the facility. Class 1, Class 2, and Class 3 industrial solid wastes, as defined in §330.3, are disposed at the facility without prior written waste-specific approval, provided the wastes meet the current criteria for the classification of industrial solid waste. Class 1 industrial solid wastes are screened by the landfill general manager or designee in accordance with Appendix IVB - Special Waste Acceptance Plan. Classification of industrial and hazardous waste will be in accordance with §335.501-515, 521 (Subchapter R: Waste Classification).

Class 1 industrial solid waste is disposed of in accordance with requirements of §330.173. The phrase "dedicated trench" as used in the regulations means the specific area in which Class 1 waste is placed for disposal.

A Class 1 industrial waste active working face will be clearly identified during site operations. All areas within the landfill footprint that are below the elevation of the surrounding natural grade are dedicated to Class 1 waste disposal. However, specific areas to be dedicated for Class 1 waste disposal will be identified as the site is developed. When new dedicated areas for Class 1 waste are identified, site drawings will be modified as appropriate. Modified site drawings are submitted to the TCEQ for review and approval. Areas dedicated to Class 1 disposal are constructed in accordance with requirements of 30 TAC §330.331 and as discussed in Part III, Attachment 10 - Soil and Liner Quality Control Plan.

Wastes which are Class 1 industrial solid wastes only because of asbestos content are accepted at the facility in accordance with requirements of §330.171(c) and §330.173 (c), as discussed in Section 4.20.3 of this Site Operating Plan.

Class 2 and Class 3 industrial solid wastes, as defined in §330.3, are accepted at the facility, provided disposal of these wastes does not interfere with proper operation of the facility.

This facility has received prior approval to dispose of Class I wastes in accordance with the facility Site Operating Plan. Additional written authorization to receive specific Class I waste will not be required due to this general TCEQ approval of Class I waste at the CSC landfill. The Class I waste approval does not restrict or limit the amount of Class I waste to 20 % of total amount (excluding Class I) of waste accepted during the current or previous year. The facility is expected to average receiving approximately between 20 – 50% of the annual waste volume as Class I waste.

The CSC Landfill will submit monthly reports documenting the Class I waste received during the previous month. Reports will be submitted to the Executive Director by the 25th day of the month following waste receipt. Reports must be on the forms provided by TCEQ and include all required information.

4.22 Prevention of Discharge of Contaminated Water

The landfill general manager takes all steps necessary to control and prevent the discharge of contaminated water from the facility. Should the discharge of contaminated water become necessary, the landfill general manager obtains specific written authorization from the TCEQ prior to discharge. All water coming in contact with waste, leachate, or contaminated soils is treated as leachate. Run-on and runoff controls for the 25-year, 24-hour storm event are controlled following the procedures set forth in Part III, Attachment 15 - Leachate and Contaminated Water Plan. The landfill is operated consistent with §330.15(h) regarding discharge of solid wastes or pollutants into waters of the United States and current discharge rules.

4.23 Leachate and Contaminated Water Plan

Leachate and contaminated water are controlled as specified in Part III, Attachment 15 - Leachate and Contaminated Water Plan. Leachate and gas condensate are recirculated only on areas underlain by a composite liner and LCS as allowed by §330.177. Leachate and gas condensate recirculation will be accomplished in the following manner:

Leachate and gas condensate will be pumped to or transported to the waste area in a tank pulled by a tractor, a water truck, or other suitable tank and distributed on the waste. Sprinklers will not be used to distribute leachate or gas condensate. Leachate and gas condensate will be recirculated throughout the year, and will only be applied over composite lined areas. Leachate may be applied to waste at the working face or daily cover areas. Leachate and gas condensate will not be applied to exterior slopes that may drain off site or on intermediate or final cover areas. Leachate will not be recirculated when it is raining or when the average wind speed is greater than 35 miles per hour.

4.24 Site Inspection and Maintenance Schedule

A typical site inspection and maintenance schedule is shown in Table IV-1. This schedule includes the maintenance required for the perimeter fence and gate, windblown waste, waste spilled on route to the site, landfill markers, the site access road, daily cover, intermediate cover, final cover, and leachate. The schedule provides general guidance only and may be modified as necessary by the general manager.

4.25 Visual Screening of Deposited Waste From View

The active Phase II disposal area is more than 1000 ft from any residences or public roadways. This facility is located in a rural area of the county that is not densely populated or exhibiting any significant growth. The CSC landfill has been operating without any additional screening measures for many years. Based on these factors, no additional screening will be provided other than waste cover and vegetation.

Table IV-4.1
Site Inspection and Maintenance Schedule

ITEM	TASK	SCHEDULE
Fence/Gate	Inspect perimeter fence and gate for damage, gaps, intrusions and the like. Make repairs if necessary.	Twice a month
Windblown Waste	Police working fence area, wind fences, access roads, entrance area, and perimeter fence for loose trash. Clean up as necessary.	Daily
Waste Spilled on Route to the Site	Police entrance area at least 2 miles from the site entrance for loose trash. Clean up as necessary.	Daily
Landfill Markers	Inspect all landfill markers for damage, color coding, and general location. Correct or replace damaged markers within 15 days of discovery.	Monthly
Site Access Road	Inspect site access road for damage from vehicle traffic, erosion, or excessive mud accumulation. Maintain as needed with crushed rock or stone.	Daily (Wet Weather) Weekly (Otherwise)
Daily Cover	Inspect for proper placement, thickness, and compaction. Correct problems as needed.	Daily
Intermediate Cover	Inspect for proper placement, thickness, erosion, compaction and for presence of waste or other contamination. Correct problems as needed.	Weekly
Final Cover	Inspect for proper placement, thickness, compaction, slope, settlement and erosion. Maintenance will be ongoing throughout postclosure care period. Correct problems as needed.	Weekly
Leachate	Measure depth of leachate in sump.	Twice a week until production rate is determined, then as necessary.

5 DETECTION AND PREVENTION OF DISPOSAL OF PROHIBITED WASTES

5.1 General

CSC Landfill has a program to exclude from the landfill regulated hazardous waste as defined in 30 TAC §330.3 and PCB wastes as defined in 40 CFR 761 (except as authorized for disposal at this facility by the United States Environmental Protection Agency; see United States Environmental Protection Agency authorization for land disposal of PCBs in Appendix IVD to Part IV) as well as other prohibited wastes. The program includes training site personnel to know in detail what the prohibited wastes are, how to perform a random inspection, how to control site access, what training is provided for site personnel, and what procedures are required in the event of identification of regulated wastes. The detection and exclusion program includes at least the following steps:

- Random inspections of incoming loads.
- Records of all inspections.
- Training for facility personnel to recognize prohibited waste.
- Notification to TCEQ of any incident involving the disposal of prohibited waste at the landfill.
- Provisions for remediation of the incident.
- No free liquids, including unstabilized sludges, are accepted (as determined by the paint filter test).

5.2 Load Inspection Procedure

All incoming loads are visually inspected by a spotter at the working face(s). Should any indication of prohibited waste be detected, appropriate landfill personnel conducts a thorough evaluation of the load. The driver is directed to a load inspection area located near the working face over an approved lined area, where the load is discharged from the vehicle. The inspector breaks up the waste pile and inspects the material for any hazardous or prohibited waste. Suspicious wastes are flagged and samples are taken for laboratory analysis. Known prohibited waste is placed back into the vehicle and the driver is instructed to depart the site. Should any regulated hazardous waste be detected, the entire load is refused.

In addition to the above procedure, incoming loads are inspected on a random basis. The landfill general manager is responsible for determining the random inspection schedule, but a minimum of one inspection per day occurs. The driver of the randomly selected load is notified at the scale house and instructed to proceed to the load inspection area. Additional waste screening takes place as described in Section 4.2 of this SOP.

The load inspectors wear personal protective equipment that meet or exceed OSHA standards.

5.3 Recordkeeping

The landfill general manager is required to maintain and include in the site operating record the following:

- Reports of load inspections
- Records of prohibited waste notifications
- Personnel training records

Reports of load inspections are completed for each inspected load. The reports include at a minimum, the date and time of inspection, the name and address of the hauling company and driver, the type of vehicle, the size and source of the load, contents of the load, indicators of prohibited waste, and results of the inspection.

The TCEQ is notified whenever prohibited waste is detected. Records of the notification will be kept in the site operating record and include the date and time of notification, the individual contacted, and the information reported.

Personnel training records will be maintained in the site operating record and include evidence of successful completion of the training, type of training received, and the name of the instructor.

5.4 Training

Load inspectors, site managers, equipment operators, and scale operators maintain a thorough understanding of this SOP and are trained in the following areas:

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

Documentation of training is placed in the landfill operating record.

5.5 Managing Prohibited Wastes

Unknown wastes undergoing analysis are properly segregated and protected against the elements, secured against unauthorized removal, and isolated from other waste and activities.

Known prohibited wastes detected during the inspection are returned immediately to the hauler. If the hauler is not available, the waste is safely stored until provisions for removal can be arranged.

If prohibited wastes are detected, the TCEQ is notified. As soon as is practical, the hauler is required to remove the hazardous waste from the site. Prior to removal, the hauler must obtain an EPA identification number, package the waste in accordance with TxDOT regulations, and properly manifest the waste designating a permitted facility to treat, store, or dispose of the hazardous waste.

6 FIRE PROTECTION PLAN

6.1 Fire Prevention Procedures

Landfill operations are susceptible to fires from several different sources. In addition to fires that may develop in MSW at the working face, CSC Landfill has a fuel containment area, and operations include maintenance and fueling of vehicles. The landfill operations include a solidification basin where liquids are processed. The solidification basin receives non-flammable liquids comprised predominantly of water, and therefore is not a potential fire hazard. This section addresses fire protection and prevention procedures that will be used by the landfill.

The following steps are taken regularly by designated landfill personnel to prevent fires:

- Burning waste is prevented from being dumped in the active area of the landfill. The gate attendant and equipment operators are alert for signs of burning waste such as smoke, steam, or heat being released from incoming waste loads. Should burning waste be delivered to this site, it will be separated from the surrounding waste and immediately covered with clean cover material. The dozer or compactor will be used to move waste and spread soil.
- Fuel spills are contained and cleaned up immediately.
- Landfill equipment does not remain in the active area of the site overnight.
- Dead trees, brush, or vegetation adjacent to the landfill are removed immediately, and grass and weeds mowed so that forest, grass, or brush fires cannot spread to the landfill. Fires that may develop in brush or grass will be smothered with soil or extinguished with water from a hose or the water truck (depending on the location).
- Smoking is not allowed on the active areas of the landfill.
- A stockpile of earthen material adequately sized to cover the working face(s) is maintained within 2,500 feet of the working face or active disposal area for fire protection. The minimum amount of earthen material to be stockpiled is based on 6" spread over a 80' by 160' working face or 237 CY. The CSC landfill will maintain sufficient earthmoving equipment capable of spreading 6" of stockpiled earth over the working face(s) in approximately one hour. Supporting calculations demonstrating adequacy for covering waste are presented in

Appendix IVE. Landfill equipment will have fully charged fire extinguishers. At the end of the operational day, daily cover may be taken from the stockpile, but the stockpile shall be replenished sufficiently early the next working day to assure adequate soil is available to cover the entire working face with 6 inches of soil.

- Vehicle maintenance and fueling areas will be kept clean of debris and litter. Oil products will be stored in appropriate closed containers or tanks. Fuel spills will be contained and cleaned up immediately. "No Smoking" signs will be posted where oil products are stored or used. Appropriate fire extinguishers will be maintained near oil storage and usage areas and will be used to extinguish oil fires. Smothering with soil or containing with a soil berm may also be implemented.

6.2 Specific Fire-Fighting Procedures

The following procedures are followed in the event of a fire at the CSC Landfill:

- If a fire occurs on a vehicle or piece of equipment, the equipment operator should bring the vehicle or equipment to a safe stop. If safety of personnel will allow, the vehicle must be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine should be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment.
- If a fire is in the working face, the burning area should be isolated and pushed away from the working face quickly, or fire breaks should be cut around the fire before it can spread. If this is not possible or unsafe, efforts to cover the working face with earth must be initiated immediately to smother the fire.
- If a fire occurs in the waste solidification or stabilization area, all equipment, vehicle and personnel will be moved a safe distance from the fire. If the fire is small enough to permit smothering with earth material, available dozers or other equipment will be used to apply enough soil to smother the fire. Otherwise the fire should be isolated using fire breaks until it burns down.

The CSC Landfill does not have any brush collection areas, shredding, mulching or composting areas, used oil storage or construction/demolition waste areas.

6.3 General Rules for Fires

The following rules are implemented in the event of a fire at the CSC Landfill:

- Contact the Fire Department by calling 911.
- Alert site manager or designee
- Assess extent of fire, possibilities for the fire to spread, and alternatives for extinguishing the fire.
- If it appears that the fire can be safely fought with available fire fighting devices until arrival of the Fire Department, attempt to contain or extinguish the fire.
- Upon arrival of Fire Department personnel, direct them to the fire and provide assistance as appropriate.
- Do not attempt to fight the fire alone.
- Do not attempt to fight the fire without adequate personal protective equipment.
- Be familiar with the use and limitations of firefighting equipment available onsite.
- Firefighting methods include smothering with soil, separating burning material from other waste, and spraying with water from the water truck or water pumped from nearby ponds or streams. If detected soon enough, a small fire may be fought with a hand-held fire extinguisher. A fire extinguisher is located at the scale house and on each piece of equipment. Under this circumstance, the fire area should be watered or otherwise controlled to ensure that the fire is out.

A common firefighting technique that can be quickly employed to fight a landfill fire is smothering with soil. The faster that soil can be placed over the fire, the more effective this method will be in controlling and extinguishing the fire. The stockpiled daily cover may be used for firefighting purposes. This technique may be used at the Class I and MSW working face areas as well as the solidification area if fire is small enough to be controlled or extinguished by this method.

The site is equipped with fire extinguishers of a type, size, location, and number as recommended by the local fire department. Each fire extinguisher is fully-charged and ready for use at all times. Each extinguisher is inspected on an annual basis and recharged as necessary. These inspections are performed by a qualified service company, and all extinguishers display a current inspection tag. Inspection and recharging are performed following each use. At a minimum, the scale house and all landfill equipment and vehicles are equipped with fire extinguishers.

- Landfill Personnel will be trained in Fire Protection Plan procedures and fire safety.
- Annual training updates should be conducted in accordance with Section 2 of the SOP.

If a fire occurs that cannot be extinguished within ten minutes of detection, the commission's region office will be contacted upon detection by telephone, and in writing within 14 days with a description of the fire and response.

The potential for accidental fires will be minimized by the use of earthen cover applied to the active face and compacted with heavy equipment.

7 RECORDKEEPING REQUIREMENTS

The landfill general manager maintains a copy of the permit, the approved SDP, the SOP, the Groundwater Sampling and Analysis Plan (see Part III, Attachment 11), the Final Closure Plan (see Part III, Attachment 12), the Postclosure Care Plan (see Part III, Attachment 13), the Landfill Gas Management Plan (see Part III, Attachment 14), the Leachate and Contaminated Water Plan (see Part III, Attachment 15), a copy of all State and Federal regulations referred to in this plan, and any other required plans or documents onsite at all times during the active life of the facility. These plans and documents are considered a part of the operating record for the facility. The landfill general manager provides written notification to the TCEQ of any changes made to the above mentioned documents. The operating record for the CSC Landfill is maintained at the site.

The landfill general manager is responsible for recording and retaining in the site operating record the information listed below:

- All location restriction demonstrations
- Inspection records, training procedures, and notification procedures relating to excluding the receipt of prohibited waste
- Inspection records and training procedures relating to fire prevention and site safety
- Personnel training records, personnel job descriptions and training procedures relating to excluding the receipt of prohibited waste
- Results from gas monitoring events and any remediation plans relating to explosive and other gases
- Unit design documentation for the placement of leachate or gas condensate in the landfill
- Leachate sump level measurements
- Leachate disposal records
- Demonstrations, certifications, findings, monitoring, testing, and analytical data relating to groundwater monitoring and corrective action
- Closure plans and monitoring, testing, or analytical data relating to closure requirements

- Postclosure care plans and monitoring, testing, or analytical data relating to postclosure requirements
- Cost estimates and financial assurance documentation relating to financial assurance for closure and postclosure care
- Copies of all correspondence and responses relating to the operation of the facility, modifications to the permit, approvals, and other matters pertaining to technical assistance
- All documents, manifests, trip tickets, etc., involving special waste
- Other documents as specified by the approved permit or by the Executive Director of the TCEQ
- Annual waste acceptance rate documentation including quarterly and annual solid waste summary reports required by §330.675. The annual waste acceptance rate is described in detail in Section 2 of Part III of this permit application. If the annual waste acceptance rate is exceeded and the exceedance is not due to a temporary event, such as receipt of special wastes from a single or multiple source(s) that will not be ongoing, then the facility shall file an application to modify the permit in accordance with §330.125
- Unauthorized material removal
- Alternate Operating Hours
- Weekly Landfill Marker Inspections
- Landfill gas management plan required reports and submittals
- RACM acceptance records
- Personnel operator licenses issued in accordance with 330, Subchapter F relating to Municipal Solid Waste Supervisors
- Job title for each position at the facility related to waste management, and the name of the employee
- Written job description for each job position including requisite skill, education, or other qualifications, and duties of the employee assigned to the position
- Written description of the type and amount of introductory and continuing training that will be given to each person filling a position.
- Records that document the required training and completion of training by employees
- Training records on current personnel will be kept until facility closure and training records on former employees will be kept at least three years from the

date the employee last worked at the facility. Personnel training records may accompany personnel transferred within the same company.

The landfill general manager retains all information contained within the site operating record of the facility and all plans required for the facility for the life of the facility including the postclosure care period. All information contained in the operating record will be furnished upon request to the Executive Director.

The owner or operator shall provide written notice in the form of a Soil Liner Evaluation Report (SLER) of the final construction and lining of a new disposal area to the executive director as described in §330.341 14 days prior to placement of waste in a new cell. The executive director has 14 days to provide verbal or written response. If no comments are received by the end of the 14th day following the executive director's receipt of the report, waste may be placed in the new cell.

8 CONTINGENCY PLAN

This contingency plan is intended to address the requirements of §335.589 and provide a written plan that the site manager and personnel can use in the case of emergencies that involve fires, explosions, any unplanned release of waste constituents that could threaten human health or the environment.

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

The contingency plan will be reviewed and updated or modified in the event one of the following occurs:

1. The facility permit is revised
2. The plan fails in an emergency
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fires, or releases of waste or constituents of such waste, or changes the response necessary in an emergency
4. the list of emergency equipment changes

Emergencies

Fire: Including building fires, grass fires, vehicle fires or fires that occur as a result of waste operations, as well as any other fire that occurs within the facility boundaries.

Explosions: Any explosive occurrences within active waste operations areas or at the facility.

Release of Waste: Including waste chemical spills outside of lined or contained areas leachate spills or releases that result in offsite migration of contaminated liquid; release of toxic gases into the air as a result of fire or adverse chemical reactions between incompatible wastes.

Other Emergencies: Any occurrence at the landfill that threatens the human health or the environment

List of Emergency Response Contacts

The following facilities and names are to be contacted when appropriate for emergencies that are described in this plan

Police: **911**
 Ellis County Sheriff – (972) 937-6060

Fire: **Avalon Fire Department**
Day (972) 627-3224
Night (972) 627-0075

Hospital: **Ennis Regional Medical Center**
(972) 878-7402

HAZMAT: **Avalon Fire Department**
Day (972) 627-3224
Night (972) 627-0075

County Commissioner: **Elliis County Precinct #2**
(972) 875-3241
Larry Jones - Commissioner

Emergency Personnel:

The following personnel are qualified to act as emergency coordinator and have been trained to implement this contingency plan in cases of emergency.

Primary Emergency Coordinator:

Landfill Site Manager
101 Republic Way
Avalon, Texas
(972) 627-3413

Secondary Emergency Coordinator:

Landfill General Manager
101 Republic Way
Avalon, Texas
(972) 627-3413

Emergency Equipment

Fire Extinguishing Equipment:

Fire extinguishers are located within the gate house and offices at the entrance to the facility as well as on each piece of landfill equipment. Other fire extinguishing equipment consists primarily of earth moving equipment such as loaders, dozers and dump trucks that could be used to smother small fires with stockpiled earth.

Spill Response Equipment:

Spill response materials are located within close proximity of the gate house for easy access in the case of a waste spill.

Emergency Communications Systems:

Handheld Radios:

All operators and spotters have two-way radio communication

Signs:

Directional signs are posted indicating disposal locations, i.e. solidification area, Class 1 area and MSW area

Decontamination Equipment:

Power washers, potable water supply and temporary storage tanks are available.

Facility Evacuation Plan

In the event of an emergency that threatens the health or safety of facility personnel, the emergency coordinator will implement an orderly evacuation of all personnel from the site. It will be the responsibility of the emergency coordinator to make the determination of what constitutes an event requiring evacuation. Potential events might include; fires that cannot be contained or extinguished with onsite equipment; spills that release toxic materials that may expose personnel to hazards.

Evacuation Procedures

If the Emergency Coordinator determines that evacuation is necessary the following steps should be performed in an orderly manner.

1. Sound an alarm that can be heard or seen by all personnel on site that will immediately be recognized as an evacuation signal.
2. Use two-way radios to communicate with personnel in the field to verify they are proceeding to evacuate the site.
3. Emergency Coordinator or designated persons should visually verify that site personnel are all evacuated prior to leaving the site.
4. Notify appropriate state and local authorities that an evacuation is taking place.

Evacuation Route

The primary evacuation route will be the main entrance road into the landfill. All personnel should be informed that this is the primary route for evacuation. In the event that this route is not accessible, an alternate route adjacent to the main entrance out of the landfill will be used. This route will be clearly marked and have designated personnel directing people to this route during emergencies if the primary evacuation route is not available.

Emergency Coordinator

The site manager will function as the primary emergency coordinator and will remain at the facility or on call during landfill operations and be able to respond to an emergency at the landfill within a short period of time. The emergency coordinator will coordinate all emergency response activities and be familiar with this contingency plan as well as facility layout and operations. The emergency coordinator has the authority to commit resources needed in emergencies to carry out the contingency plan.

Emergency Procedures

In the event of an emergency situation, the emergency coordinator shall immediately:

1. Notify all facility personnel by two-way radio or in person and activate emergency alarm
2. Notify all appropriate state and or local agencies with designated response rolls for specific types of emergencies
3. If there is a release, fire or explosion, the emergency coordinator shall immediately identify the character, source, amount and aerial extent of any released materials. This may be done by visual observation and if necessary chemical analysis. Facility records that contain specific waste characterization information may also be used to make this assessment.
4. The emergency coordinator shall assess the possible hazards to human health and the environment that may result from the release, fire or explosion. The assessment will consider both direct and indirect effects of the emergency situation. In the event of a fire the emergency coordinator should assess the potential for injury to on site personnel and take steps appropriate to minimize fire danger. Chemical releases should be assessed to determine potential hazards due to human exposure. Indirect effects of emergencies need to be also considered including but not limited to the effects of toxic gases resulting from fires or chemical reactions, and the potential release of water or other chemicals used to fight fires or prevent spread of fires from explosions
5. If the emergency coordinator determines that an emergency situation threatens the health and safety of residents or public outside the facility boundary that may require evacuation of surrounding residents or traffic rerouting, the Emergency Coordinator shall immediately notify appropriate local authorities, and needs to coordinate directly with authorities to help determine the need for evacuation or traffic changes.
6. The emergency coordinator shall notify the government official designated as the on-scene coordinator for the geographical area or the National Response Center. The notification shall include the following information:
 - Name and telephone number of reporter
 - Name and address of the facility
 - Time and type of incident
 - Name and quantity of material involved, to the extent known
 - Extent of any injuries
 - Possible hazards to human health or the environment outside the facility

7. During the emergency, the emergency coordinator shall take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other waste at the facility. These measures may include, where applicable, stopping receipt of incoming waste, collecting and containing released waste, and removing or isolating waste from other waste on site. Fire-fighting procedures are outlined in the fire protection plan included in this Site Operating Plan. Liquid releases within the facility may be contained using clean soil from on site to berm around and or solidify the waste for removal to a disposal area.
8. If the facility stops operations in response to a—an emergency, the emergency coordinator will continue to monitor the situation for any occurrences that may result in additional hazards to the public
9. After the emergency, the emergency coordinator shall provide for the proper disposal of any recovered waste material, contaminated soil or water, or any other material that results from the fire, release or explosion at the facility. If the waste material meets the classification of a Class I, II or II non - hazardous industrial waste as defined by §335 Subchapter R, then it can be disposed of on site in accordance with these permit documents and the rules. If the material cannot be disposed of on site the emergency coordinator shall arrange for the proper transportation and disposal of the material to a facility that is permitted to receive that material.
10. The emergency coordinator shall ensure that the affected area is cleaned and or decontaminated prior to resuming normal operations in that area and all emergency equipment used for the cleanup has been properly cleaned if necessary prior to continued use in other routine landfill operations.
11. The emergency coordinator or landfill manager shall notify the TCEQ that all areas affected by the release, fire or explosion have been clean and restored to a safe condition prior to resuming normal operations in the affected area.
12. The emergency coordinator shall note in the operating record the time date and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, a written report will be submitted to the TCEQ that includes the following information:
 - Name, address and telephone number of the permittee or owner
 - 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
 - Assessment of actual or potential hazards to human health and the environment where applicable
 - Estimated quantity and disposition of recovered material resulting from the incident

13 EMERGENCY RESPONSE CONTACTS

13.1 List of Emergency Response Contacts

The following facilities and names are to be contacted when appropriate for emergencies that may occur at the CSC Landfill.

Police:	911 Ellis County Sheriff (972) 937-6060
Fire:	Avalon Fire Department (463) 951-9970
Hospital:	Ennis Regional Medical Center (972) 875-0900
HAZMAT:	Avalon Fire Department (463) 951-9970
County Commissioner:	Ellis County Precinct #2 (972) 825-5333
Primary Emergency Coordinator:	Landfill Environmental Manager 101 Republic Way Avalon, Texas (682) 401-1196
Secondary Emergency Coordinator:	Team Environmental Manager 101 Republic Way Avalon, Texas (903) 539-4065

APPENDIX VII- ESA-NHPA

**Biological Evaluation:
CSC Landfill PCB Permit – Italy, TX**

PREPARED BY:
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 6,
LAND, CHEMICAL, AND REVITALIZATION BRANCH
1201 ELM STREET
DALLAS, TX 75270

May 22, 2025

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1.0 Background Information

CSC Landfill (TXD000836585) currently operates a landfill permitted to dispose of non-liquid polychlorinated biphenyl (PCB) waste with PCB concentrations limited to 50 parts per million (ppm) to 500 ppm of PCBs at its landfill facility located at 101 Republic Way, Italy, Ellis County, Texas (Figure 1). The requirements of 40 CFR 761.75 will be met in the PCB disposal area. Construction will be limited to preparing new cells of the previously approved landfill area to receive waste and the placement of received waste.

2.0 Scope of Federal Action

2.1 Environmental Protection Agency (EPA) Action on PCB Disposal Permit Reauthorization Request

The federal action that is the subject of this Biological Evaluation (BE) is EPA's proposed approval of CSC Landfill's permit reauthorization request. The design and operation at the facility in Ellis County would remain unchanged, requiring placing of waste within the existing facility footprint. Permit approval would allow for the continued disposal of non-liquid PCB-containing waste in accordance with 40 CFR 761.75 in the designated PCB disposal areas as well as treatment of incidental liquid waste such as landfill leachate.

The following analysis of the effects of the action assumes that the operating procedures implemented at the site will prevent the release of PCB-containing waste.

2.2 Site and Surrounding Land Use

The existing CSC Landfill is a Type I municipal solid waste (MSW) facility operating under Texas Commission on Environmental Quality (TCEQ) permit No. MSW H1209 (Facility Layout Appendix A). PCB waste with concentrations in the range of 50-500 ppm will be disposed of in the Class 1 industrial waste disposal area. Adjacent land uses include Highway 34 to the south, agriculture to the north, east and west, and some industrial activity to the west/southwest. There is a dammed pond to the northeast of the site and a narrow treed area along a stream linked to the pond.

3.0 Effects Assessment

3.1 Species of Potential Concern

The EPA requested and received the current Endangered Species Act (ESA) species list through the US Fish and Wildlife Service's (USFWS) ECOS-IPaC system for the defined action area. Table 1 lists the threatened, endangered, and candidate species from the 2025 list as well as their current status and critical habitat.

Figure 1. Site Location (Google 2025)

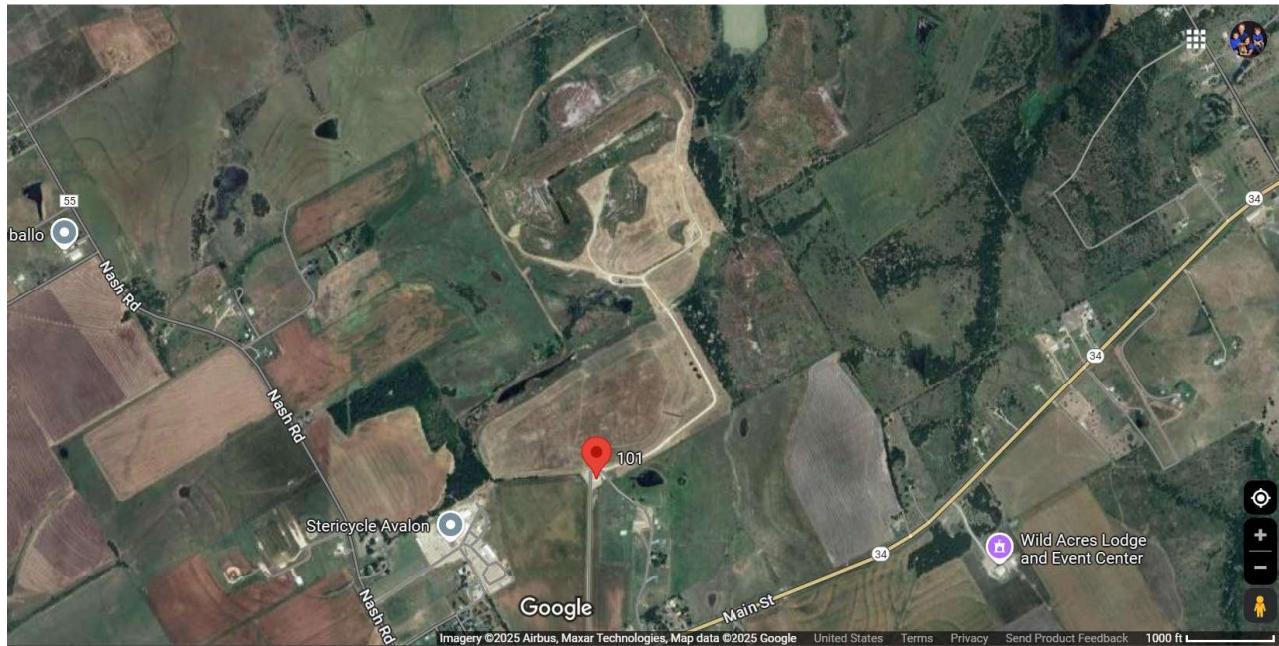


Table 1. Species listed under the ESA within the action area (IPaC 2025)

Species	Status	Critical Habitat
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed Endangered	Wherever found. No critical habitat has been designated
Piping Plover (<i>Charadrius melanotos</i>)	Threatened	Location does not overlap the critical habitat; species only needs to be considered for wind energy projects
Rufa Red Knot (<i>Calidris canutus rufa</i>)	Threatened	Wherever found; species only needs to be considered for wind energy projects
Whooping Crane (<i>Grus americana</i>)	Endangered	Location does not overlap the critical habitat
Alligator Snapping Turtle (<i>Macrochelys temminckii</i>)	Proposed Threatened	Wherever found. No critical habitat has been designated
Monarch Butterfly (<i>Danaus plexippus</i>)	Proposed threatened	Wherever found. No critical habitat has been designated

3.2 Species Assessments and Determinations

The EPA has made the following assessments and determinations considering information produced by USFWS and other researchers in evaluating whether EPA's proposed permitting action is Likely to Adversely Affect, Not Likely to Adversely Affect, or would have No Effect on the listed species.

The tri-colored bat hibernates six to nine months a year, primarily in caves or mines (Texas 2023).

This bat has been found to migrate only an average of 31 miles to its summary nursery site, tending to consist of 35 or fewer females in buildings, tree cavities, or rock crevices, from which they emerge after sunset and again around midnight to catch small insects along a forest edge or over a pond or other waterway (Texas 2023). There do not appear to be any mines or caves in the site vicinity to provide suitable wintering habitat, only the abandoned Itasca Quarry, a surface mine approximately 20 miles to the west of the landfill (MinesDatabase 2024). Ellis County lies within the Texas Blackland Prairie (US SCS 1990) in north central Texas. The SCS Landfill sits in an undeveloped area about 2,000 ft north Highway 34/Main St and 5.5 mi east of Interstate 35. With no apparent wintering habitat in the vicinity and limited wooded areas to provide a forest edge for foraging, it is unlikely that the tri-colored bat would be found near the facility. Therefore, re-permitting of the CSC Landfill will have no effect on the tri-colored bat.

Neither the Rufa Red Knot, Piping Plover nor Whooping Crane has critical habitat in the vicinity of the subject facility (USFWS 2025). Additionally, the Rufa Red Knot and Piping Plover need only be considered in wind energy project. Therefore, re-permitting of the CSC Landfill will have no effect on these bird species.

The alligator snapping turtle is a reptile that is primarily found in riverine systems which flow into the Gulf. Because the subject facility is not close to a suitable water body, re-permitting of the landfill will have no effect on the alligator snapping turtle.

Monarch butterflies require milkweed plants for laying their eggs, specifically for the development of the larval stage which requires the cardenolides supplied by these plants for the larvae to develop their toxicity, a protective mechanism against predators (USFWS 2022). The adult butterfly depends on flowering plants to gather nectar for sustenance during migration. The renewal of the CSC Landfill's permits will not result in any construction at the facility, so no reduction in habitat would occur. The World Health Organization indicates that there has been no evidence that plants concentrate PCBs, but rather they reflect the concentration in ambient air (2000). Because the CSC Landfill only receives solid PCB waste, the likelihood of PCB-containing particulate matter being released to the air is low. Therefore, permit renewal will have no effect on monarch butterflies.

4.0 Effects Determination

The EPA has determined that approval of the PCB Landfill Disposal Renewal Permit for the CSC Landfill is expected to have no effect on any of the species in the USFWS IPaC list.

5.0 References

The Cornell Lab. 2023. Piping Plover Life History. Retrieved from:

https://www.allaboutbirds.org/guide/Piping_Plover/lifehistory

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Texas Parks and Wildlife (TPWD). 2023. Tricolored Bat (*Perimyotis subflavus*). Retrieved from: <https://tpwd.texas.gov/huntwild/wild/species/easpip/>

USDA. 2022a. Habitat Needs. Retrieved from USDA US Forest Service website: https://www.fs.usda.gov/wildflowers/pollinators/Monarch_Butterfly/habitat/index.shtml

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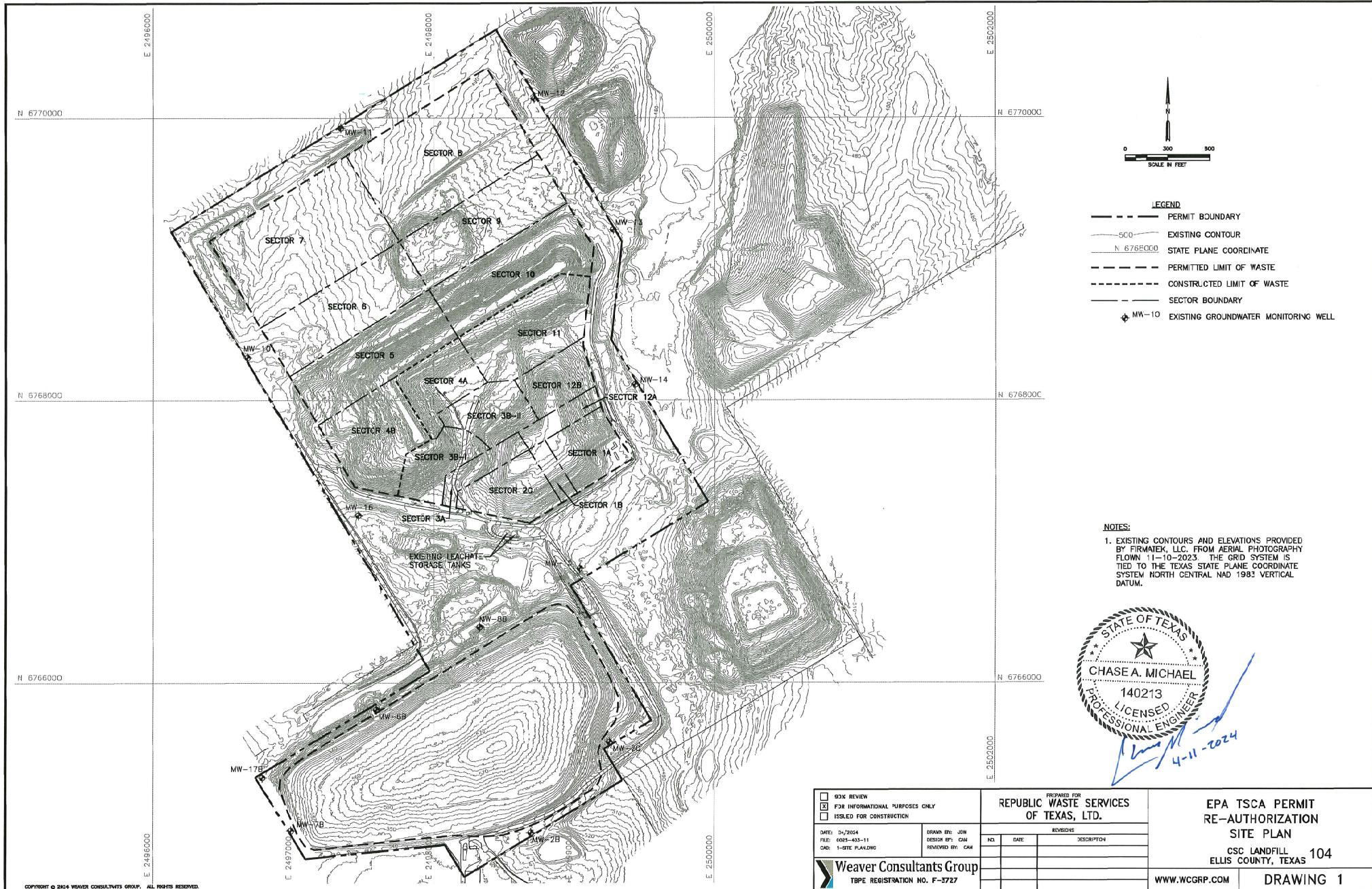
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Appendix A



Appendix B

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Ellis County, Texas



Local office

Arlington Ecological Services Field Office

📞 (817) 277-1100

📠 (817) 277-1129

✉️ arles@fws.gov

17629 El Camino Real, Suite 211

106

Houston, TX 77058-3051

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Tricolored Bat <i>Perimyotis subflavus</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

Birds

NAME	STATUS
Piping Plover <i>Charadrius melanotos</i> This species only needs to be considered if the following condition applies: • Wind Energy Projects There is final critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6039	Threatened
Rufa Red Knot <i>Calidris canutus rufa</i> Wherever found This species only needs to be considered if the following condition applies: • Wind Energy Projects There is proposed critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/1864	Threatened

Whooping Crane *Grus americana*

Endangered

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.

<https://ecos.fws.gov/ecp/species/758>

Reptiles

NAME	STATUS
Alligator Snapping Turtle <i>Macrochelys temminckii</i> Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4658	Proposed Threatened

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> Wherever found There is proposed critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The [data](#) in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey.

Please review the 'Steps to Take When No Results Are Returned' section of the [Supplemental Information on Migratory Birds and Eagles document](#) to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds
<https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>

- Nationwide avoidance and minimization measures for birds
<https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC
<https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply).

Proper interpretation and use of your eagle report

On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Migratory birds

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The Service interprets the MBTA to prohibit incidental take.

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds
<https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC
<https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

Your IPaC Migratory Bird list showcases [birds of concern](#), including [Birds of Conservation Concern \(BCC\)](#), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the [Nationwide avoidance and minimization measures for birds](#) document, and any other project-specific avoidance and minimization measures suggested at the link [Measures for avoiding and minimizing impacts to birds](#) for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles document](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Prairie Loggerhead Shrike <i>Lanius ludovicianus excubitorides</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8833	Breeds Feb 1 to Jul 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental](#)

[Information on Migratory Birds and Eagles](#), specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

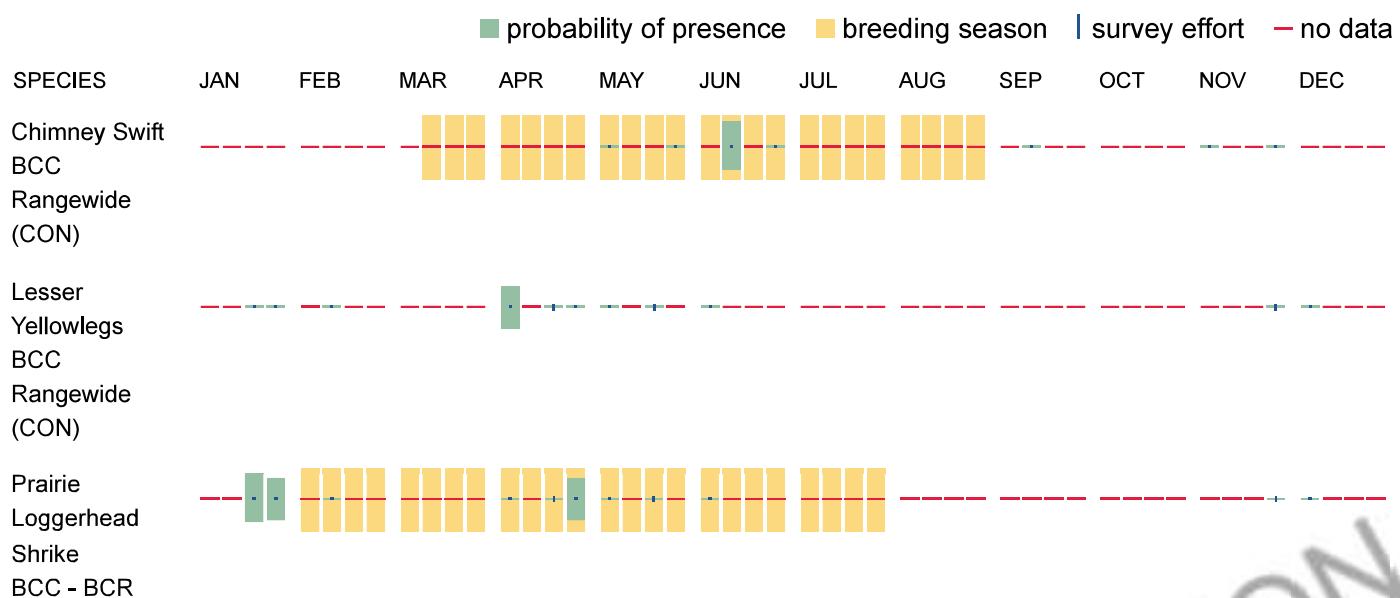
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on ¹¹⁴ all years of available data, since data in these areas is currently much more sparse.



Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Avoidance & Minimization Measures for Birds](#) describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. [Additional measures or permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the [Bald and Golden Eagle Protection Act](#) and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle ([Bald and Golden Eagle Protection Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for the **species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the [RAIL Tool](#) and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your "IPaC PROBABILITY OF PRESENCE SUMMARY" at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Bald and Golden Eagle Protection Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ "Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

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FRESHWATER FORESTED/SHRUB WETLAND

[PFO1Ch](#)

FRESHWATER POND

[PUBHx](#)[PUBHh](#)

RIVERINE

[R4SBC](#)[R5UBH](#)

A full description for each wetland code can be found at the [National Wetlands Inventory website](#)

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate 119

Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

April 8, 2025

MEMORANDUM

SUBJECT: Documentation of NHPA Section 106 Determination
CSC Landfill EPA TSCA PCB Permit Reauthorization
EPA RCRA ID No. TXD000836585

FROM: Lisa Schaub, Remedial Project Manager *Lisa Schaub*
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 dispose of 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 Avalon Missionary Baptist Church, is about 0.66 mile to the southwest of the site, this historic property will not be impacted. Dean Cemetery, located on private property and containing 14 memorials dated 1886 to 1905, lies about 500 ft south of the facility boundary. As renewing the disposal permit will not result in changes to landfill operations which have been ongoing since its permitting in 2000, the reauthorization should not adversely affect the cemetery.

ATTACHMENTS

1. CSC Landfill – Google Maps
2. CSC Landfill with Historic Resources

cc: Harry Shah, LCR-RP

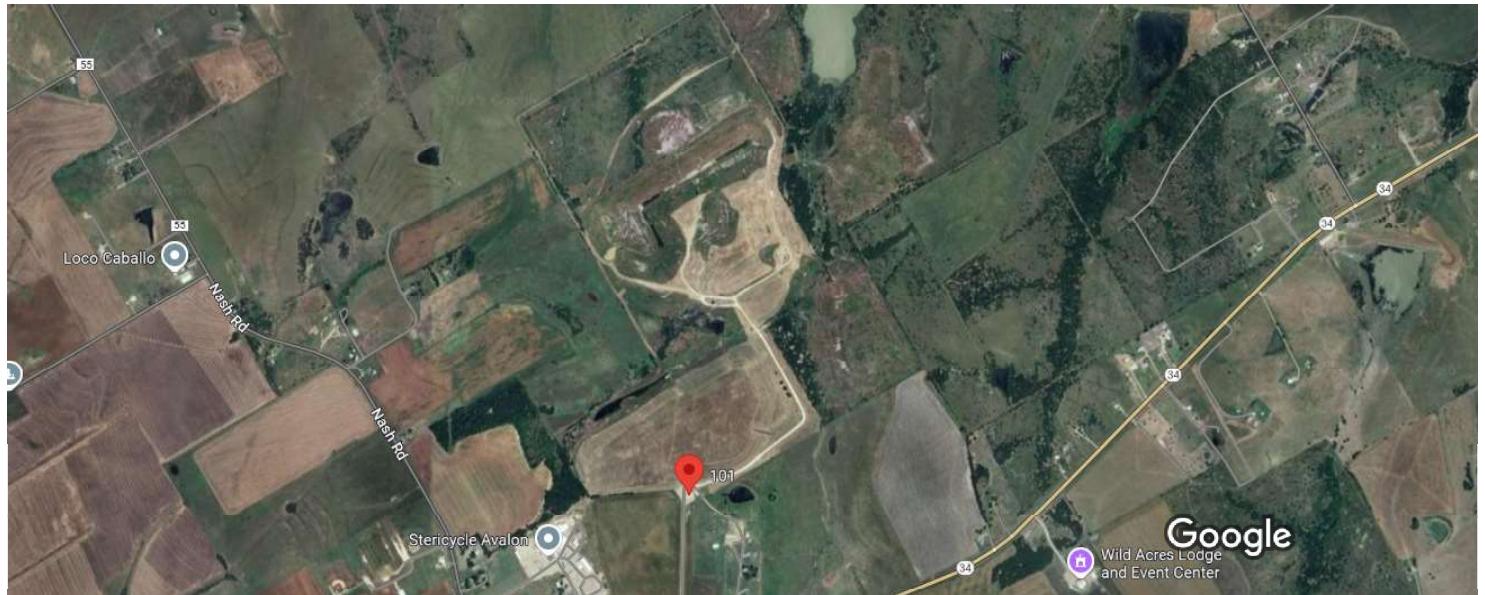
Jay Przyborski, ORCD

Sunita Baniya, LCR-RP

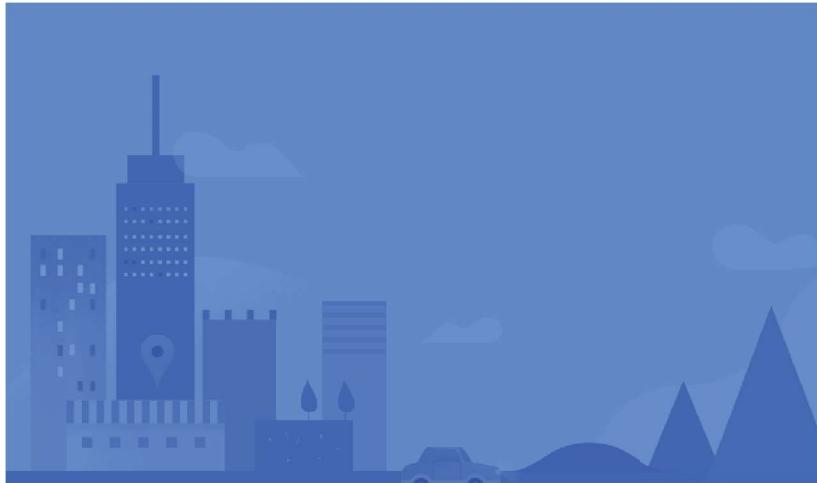


101 Republic Way

CSC Landfill



Imagery ©2025 Airbus, Maxar Technologies, Map data ©2025 Google 1000 ft



101 Republic Way

Building



Directions



Save



Nearby



Send to phone



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101 Republic Way, Italy, TX 76651

Historical Resources Near CSC Landfill

