Volume 5
Part IV Landfill Permit Amendment
Site Operating Plan
TCEQ MSW Permit No. 1522B

City of Victoria, Texas

City of Victoria Landfill Lateral and Vertical Expansion
Project No. 107608

Revision 0, March 28, 2022

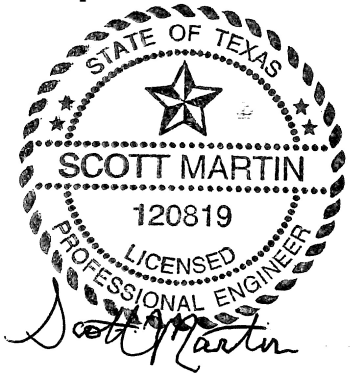
Volume 5
Part IV Landfill Permit Amendment
Site Operating Plan
TCEQ MSW Permit No. 1522B

prepared for

City of Victoria, Texas
City of Victoria Landfill Lateral and Vertical Expansion
Victoria County, Texas

Project No. 107608

Revision 0, March 28, 2022



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INDEX AND CERTIFICATION

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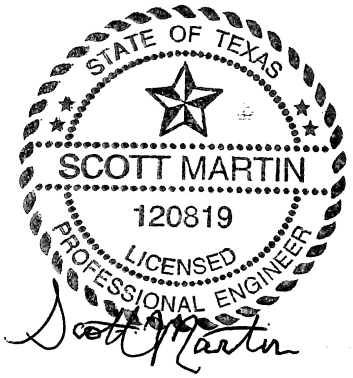
Certification

I hereby certify, as a Professional Engineer in the state of Texas, that the information in this document was assembled under my direct personal charge. This report is not intended or represented to be suitable for reuse by the City of Victoria, Texas or others without specific verification or adaptation by the Engineer.



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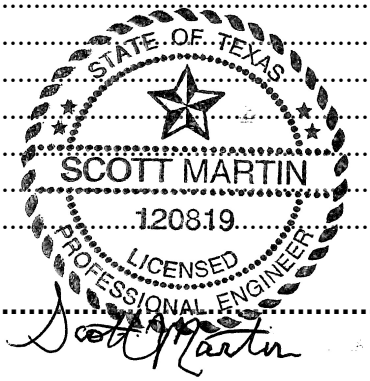

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LIST OF TABLES

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LIST OF ABBREVIATIONS

Abbreviation	Term/Phrase/Name
amsl	above mean sea level
Burns & McDonnell	Burns & McDonnell Engineering Company, Inc.
City	City of Victoria
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CP&L	Central Power and Light
CY	cubic yards
EPA	Environmental Protection Agency
FM	Farm to Market Road
ft	feet
ft^3	cubic feet
GLER	Geomembrane Liner Evaluation Report
GWSAP	Groundwater Sampling & Analysis Plan
Landfill	City of Victoria Landfill
lbs	pounds
LFG	Landfill Gas
mg/kg	milligrams per kilogram
MSW	Municipal Solid Waste
NHIW	Non-Hazardous Industrial Waste

Abbreviation	Term/Phrase/Name
NSPS	New Source Performance Standards
OSHA	Occupational Safety & Health Administration
PCB	polychlorinated biphenyls
ppm	parts per million
QA/QC	Quality Assurance/Quality Control
RACM	regulated asbestos containing material
RCRA	Resource Conservation Recovery Act
SDP	Site Development Plan
SLER	Soils and Liner Evaluation Report
SOP	Site Operating Plan
SPCC	Spill Prevention, Control, and Countermeasure
SWP3	Stormwater Pollution Prevention Plan
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
TPD	Tons per Day
TxDOT	Texas Department of Transportation
USC&GS	United States Coast & Geodetic Survey

1.0 INTRODUCTION

30 TAC §330.65, §330.65(a), §330.127

This Site Operating Plan (SOP) has been prepared for the City of Victoria (City) Landfill (Landfill) consistent with Title 30 Texas Administrative Code (TAC) §330.65 and §330.127. This SOP will supersede the existing SOP approved by the Texas Commission on Environmental Quality (TCEQ). The purpose of this SOP is to provide guidance to site management and operating personnel to meet the general and site-specific requirements of §330.127. This document also provides an operating guide for site management to maintain the facility in compliance with the engineering design and applicable regulatory requirements of the TCEQ. The SOP may also serve as a reference source and assist in personnel training. This SOP, the permit, and the current TCEQ regulations will be kept onsite throughout the facility's operating life.

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

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

1. Texas Commission on Environmental Quality
   Municipal Solid Waste Section
   Austin, Texas
   Telephone: 512-239-2334
2. Texas Commission on Environmental Quality, Region 14
   Corpus Christi, Texas
   Telephone: 361-825-3100
3. Texas Spill Reporting Hotline
   Spill Reporting Telephone: 1-800-832-8224

2.0 RECORDKEEPING REQUIREMENTS

30 TAC §330.121(a), §330.123, §330.125(a) through (h), §330.675

The City will maintain the following at the facility:

- A Copy of the permit (including the approved Application and any approved permit modifications and amendments);
- Approved Part III - Site Development Plan (SDP);
- Part III, Attachment 3 – Leachate and Contaminated Water Plan;
- Part III, Attachment 6 – Groundwater Sampling and Analysis Plan;
- Part III, Attachment 8 – Landfill Gas (LFG) Management Plan;
- Part III, Attachment 9 – Final Closure Plan;
- Part III, Attachment 11 – Post-Closure Maintenance Plan;
- Part IV – Site Operating Plan; and
- A copy of all state and federal regulations referred to in this plan, and any other required plans or documents at the City of Victoria Landfill as approved by the TCEQ at all times during the active life of the facility.

Consistent with §330.125(c), the City will place all information listed above, as well as in Table 2-1 in the operating record. The City shall place this information in the operating record in accordance with §330.125(b) and maintain the operating record in an organized format which allows the information to be easily located and retrieved. All information contained in the operating record will be furnished upon request to the Executive Director and will be made available for inspection by the Executive Director.

Table 2-1: Recordkeeping Requirements

Item	Rule Citation
All location restriction demonstrations	§330.125(b)(1)
Inspection logs and records, training procedures, and notification procedures relating to excluding the receipt of prohibited waste	§330.125(b)(2)
Results from gas monitoring events and any remediation plans relating to explosive and other gases	§330.125(b)(3)
Unit design documentation for the placement of leachate or gas condensate in the landfill	§330.125(b)(4)
All inspection logs and reports and all demonstrations, certifications, findings, monitoring, testing, and analytical data relating to groundwater monitoring and corrective action.	§330.125(b)(5)
Closure and post-closure plans and any monitoring, testing, or analytical data relating to post-closure requirements.	§330.125(b)(6)

Item	Rule Citation
Cost estimates and financial assurance documentation relating to financial assurance for closure and post-closure care.	§330.125(b)(7)
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.	§330.125(b)(9)
Any and all documents, manifests, scale tickets, generator waste profile sheets, etc. involving special waste.	§330.125(b)(10)
Records of the application rate and total amount for any spray-applied alternative daily cover (ADC) material applied to the working face on those days in which ADC is applied	§330.125(b)(11)
All inspection documentation noted on Table 7-4– Site Inspection and Maintenance List	§330.125(b)(12)
Leachate sump level measurements	§330.125(b)(12)
Leachate disposal records	§330.125(b)(12)
Other documents as specified by the approved permit or by the Executive Director of the TCEQ	§330.125(b)(12)
Personnel training records in accordance with §335.586(d) and §335.586(e) and operator licenses.	§330.125(e) and §330.125(f)
Annual waste acceptance rate documentation including Quarterly and Annual Solid Waste Summary Reports required by §330.675	§330.125(h)
Load inspection records.	§330.127(5)(B)
Fire occurrence notices	§330.129
Access control breach and repair notices	§330.131
A record of each unauthorized material removal event	§330.133(b)
A record of alternate operations hours	§330.135(d)
Landfill marker and benchmark maintenance records	§330.143(a)
Landfill Gas Monitoring System inspection records	§330.159
Landfill Gas Extraction System inspection records	§330.159
Oil, gas, mineral, and water well notifications and plugging certifications	§330.161
Cover inspection record	§330.165(h)
RACM acceptance records	§330.171(c)(3)(B)
Fire protection plan including procedures for using the fire protection source, and employee training and safety procedures.	§330.221(c)

The items listed in Table 2-1 will be incorporated into the Site Operating Record within seven working days of the completion of the item/record or receipt of the analytical data in accordance with 30 TAC §330.125(b). The City will retain all information contained within the Site Operating Record and all plans

listed in this Section 2.0 for the life of the facility including the post closure care period in accordance with 30 TAC §330.125(d). Consistent with §330.125(g) the Executive Director may set an alternative schedule for recordkeeping and notification.

The facility will provide the facilities and process reports required by 30 TAC §330.675 to the Executive Director. For disposal facilities and processes, a Municipal Solid Waste Fee Report is required to be submitted quarterly. The report to the Executive Director shall include information requested on the report form for the appropriate reporting period. Annually, the City shall submit a summary of the information to show the yearly totals and year-end status of the facility or process, as requested on the report form, for the appropriate reporting period.

In addition to the above, in accordance with 30 TAC §330.123, the City shall provide written notice in the form of a Soils and Liner Evaluation Report (SLER) and/or Geomembrane Liner Evaluation Report (GLER) detailing the construction and lining of a new disposal cell. The reports shall be submitted to the TCEQ for review 14 days prior to the placement of any waste in the new cell. With the exception of the initial opening of the landfill, if verbal or written response from the TCEQ is not provided by the end of the 14th day following TCEQ receipt of the report(s), placement of solid waste may begin. All SLER and GLER approvals will be maintained in the Site Operating Record.

In accordance with 30 TAC §330.125(h), if the annual waste acceptance rate exceeds the rate estimated in the landfill permit application and the waste increase is not due to a temporary occurrence, City shall file an application to modify the permit application, including the revised estimated waste acceptance rate, in accordance with 30 TAC §305.70(k) of this title (relating to Municipal Solid Waste Permit and Registration Modifications), within 90 days of the exceedance as established by the sum of the previous four quarterly reports.

3.0 PERSONNEL AND TRAINING

30 TAC §330.127(1), §330.127(3), §330.127(4)

3.1 Personnel [30 TAC §330.127(1), §330.127(3)]

This section describes the functions and minimum qualifications for each category of key personnel to be employed at the Landfill and for the supervisory personnel in the chain of command. In addition, a summary table noting the various site personnel and training requirements listed in the following sections is provided in Table 3-1.

3.1.1 Landfill Management Team

The landfill operation is under the direction of the City of Victoria's Director of Environmental Services. The City of Victoria has contracted its operations to Victoria Landfill TX, LP. Victoria Landfill TX, LP is a Delaware limited partnership qualified to do business in Texas. Victoria Landfill TX, LP's managing general partner is Allied Waste Landfill Holdings, Inc. which is an indirect, wholly owned subsidiary of Allied Waste Industries, Inc. (Allied).

The Regional Vice President has ultimate management and oversight responsibilities for all Allied hauling and disposal operations within the region that includes Texas. The District Manager is responsible for all hauling, transfer station, and landfill operations in the district that includes this facility. The District Manager's responsibilities include staff management, financial planning, as well as other management responsibilities. The District Manager reports to the Regional Vice President. The General Manager is responsible for operations oversight at landfill(s) in the district including the City of Victoria Landfill. The General Manager reports to the District Manager. Other corporate resources that are available to the City of Victoria Landfill management team are discussed in Section 3.1.8.

3.1.2 Landfill Manager/Site Manager/Facility Supervisor

The Landfill Manager (also known as Site Manager) is responsible for daily operations, administers the facility's SDP, SOP, and will also serve as the emergency coordinator. This person is responsible for assuring adequate personnel and equipment are available to provide facility operation in accordance with this SOP, the SDP, TCEQ regulations, and other applicable local, state, or federal regulations. The Landfill Manager will also be trained to implement the requirements listed in the site's Stormwater Pollution Prevention Plan (SWP3) and Spill Prevention, Control, and Countermeasure Plan (SPCC). The Landfill Manager will maintain an adequate level of competency, training, and experience to fulfill these duties. The Landfill Manager reports directly to the General Manager. The Landfill Manager will designate individual(s) to fulfill his/her duties during periods when the Landfill Manager is absent.

Wherever this SOP provides that responsibility or authority is assigned to the Landfill Manager, this responsibility or authority is automatically transferred to the individual(s) so designated by the Landfill Manager for this duty when the Landfill Manager is not present. The delegated individual will be trained by the Landfill Manager or General Manager so that they have a complete understanding of the contents of this SOP. The designated individual will have a minimum of six months of landfill operation experience or six months of on-the-job training by the Landfill Manager or General Manager. All onsite employees, which may include Scale House Staff, Equipment Operators, Mechanics, Spotters, and Laborers are under the supervision of the Landfill Manager or their designee. The Landfill Manager is responsible for hiring and terminating personnel in these positions.

As the facility supervisor, the Landfill Manager must hold a Class A License. The Landfill Manager must be familiar with the specific operating procedures set forth in this plan and will participate in training with other employees. The Landfill Manager, or their designee, is also responsible for routine site inspections as described herein.

The Landfill Manager's responsibilities include the following:

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

3.1.3 Scale House Staff

The primary job of the Scale House Staff, stationed at the site entrance, is to maintain complete and accurate records of vehicles and solid waste entering the facility. The Scale Attendant will be trained in

site safety procedures, to visually check for unauthorized wastes, to weigh vehicles, collect waste disposal fees, and direct vehicles to the working face. The Scale Attendant reports to the Landfill Manager. Specifically, Scale House Staff are required to: (1) monitor the incoming vehicles for type of waste and exclude prohibited waste; (2) sample and/or inspect waste loads to confirm that they are authorized for disposal; (3) review manifests and other shipping documents: (4) record incoming waste loads; (5) review and confirm special waste documents; and (6) accept tipping fees. Scale House Staff shall direct visitors to their destination within the facility.

Scale House Staff receive training from the Landfill Manager or an outside source with respect to special waste evaluation and acceptance. Any questions regarding acceptance of special waste are to be addressed to the Landfill Manager, Special Waste Department, or the Special Waste Liaison/Compliance Coordinator as discussed in Section 3.1.8.

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

3.1.4 Equipment Operators

The Equipment Operators report to the Landfill Manager. Equipment Operators are responsible for the safe operation of the equipment. As the personnel most closely involved with the actual landfill operation, these employees are responsible for being alert for potentially dangerous conditions, or careless and improper actions on the part of nonemployees and other persons while on the premises. Equipment operators monitor and direct unloading vehicles and are also responsible for maintenance, construction, litter abatement, and general site cleanup. Equipment Operators are also responsible for identifying prohibited wastes as discussed in Section 5.2. The Equipment Operators will intervene as necessary to prevent accidents. Equipment Operators will also report any operational problems to the Landfill Manager. Equipment Operators may also be required to assist in bird control activities under the supervision of the Landfill Manager or their designee. All equipment operators are required to wear safety equipment, as appropriate, for their work assignments.

The minimum qualifications for the Equipment Operators are being able to fulfill the duties described in this section. In addition, the Equipment Operators will have a minimum of six months of equipment operation experience or completion of a 90-day on the job training program administered by the Landfill Manager. Equipment Operators that are hired based on previous heavy equipment experience may be

assigned to operate specific types of equipment without additional training. Upon their employment, all Equipment Operators without experience in the equipment assigned will receive on-the-job training and oversight from an experienced operator until the new operator becomes proficient on the piece(s) of equipment to which he has been assigned, or until he is reassigned to a different piece of equipment for which his previous training or experience is adequate.

3.1.5 Spotters and Laborers

Spotters and Laborers will be assigned to collect litter, direct waste vehicles at the working face, and perform other tasks as needed. Spotters are also responsible for identifying prohibited wastes as discussed in Section 5.2. Spotters and Laborers will either be Victoria Landfill TX, LP employees or contract employees. Laborers may also be required to assist in bird control activities under the supervision of the Landfill Manager or their designee.

Spotters and Laborers will be required to wear safety equipment, as appropriate for their work. Contract employees oversight will be by a Victoria Landfill TX, LP employee. Spotters and Laborers report to the Landfill Manager or their designee.

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

3.1.6 Mechanics

Mechanics perform necessary and routine maintenance on equipment. Mechanics may substitute as Equipment Operators, if needed, provided they have received the required training. Mechanics report to the Landfill Manager or their designee.

The minimum qualifications for the Mechanics include being able to fulfill the duties described in this section. Mechanics will also complete a 90-day on the job training program. The site may also use third party mechanics to perform maintenance on the equipment.

3.1.7 Other Site Personnel

Other Site Personnel or Laborers may be employed from time to time in categories such as maintenance, construction, litter abatement, and general site cleanup. Other Site Personnel and Laborers report to the Landfill Manager or their designee.

3.1.8 Other Corporate Resources

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

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

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

3.2 Training [30 TAC §330.127(4)]

All facility employees and other persons involved in facility operations shall be qualified, trained, educated, and experienced to perform their duties to achieve compliance with this permit. The permittee shall comply with 30 TAC §335.586(a) and (c). The permittee shall further ensure that personnel are familiar with safety procedures, contingency plans, the requirements of the Commission's rules and this permit, commensurate with their levels and positions of responsibility, in accordance with the SDP (Part III) and SOP (Part IV).

The Landfill Manager and the Victoria Landfill management team will train the Equipment Operators, Scale House Staff, Mechanics, Laborers, and Spotters in the contents of this SOP as well as any operational requirements specified in this SOP, as applicable. City of Victoria Landfill personnel will be trained pursuant to any applicable TCEQ regulations regarding training of Municipal Solid Waste (MSW) facility personnel. Site personnel will receive training in safety procedures, contingency plans, and the requirements of the permit for this facility, as applicable. Site training and safety meetings will be scheduled at least once per month. If a regular monthly scheduled meeting is canceled, it will be rescheduled or combined with the scheduled training in the following month. Site personnel shall be scheduled for attendance at training sessions to allow site operations to continue during training sessions

and in accordance with training requirements outlined in Table 3-1. Although training topics for each month may vary, training shall be conducted at least annually for each of the following topics:

- Load inspection procedures
- Detection and control of hazardous wastes, polychlorinated biphenyls (PCB) wastes, and other prohibited wastes
- Asbestos waste management
- Waste handling procedures (acceptable and prohibited wastes)
- Emergency Response
- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment, communications, or alarm systems.
- Health and Safety
- Fire Safety (e.g., fire extinguisher use, fire protection, fire prevention, and evacuation procedures)
- Litter control and windblown waste pick-up
- Record Keeping
- Odor Detection and Control
- Properties of methane gas and safety procedures for methane gas
- Response to groundwater contamination incidents (e.g., compliance with SPCC Plan)
- Shutdown of operations (i.e., end of day closure procedures)

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

Documentation of training will be maintained in the Site Operating Record. Additional training requirements are provided in Section 5.1, Section 5.2, Section 5.4, Section 6.2, Section 7.21.1.2 and Appendix 2- Section 7.0.

Table 3-1: Site Personnel and Training Summary

Position	Minimum Qualifications	Job Description	Required Training Topics												
			Site Orientation	Site Operations	Endangered Species	Prohibited Waste Identification	Safety	Fire Prevention	Load Inspection	SPCC	Emergency Response	Landfill License	Litter Control	Random Inspections	SWP3
Landfill Manager/Site Manager	Class A License	Refer to Section 3.1.2	X	X	X	X	X	X	X	X	X	X	X	X	X
Scale House Staff	Fulfill the duties described in Section 3.1.3 as well as a high school diploma or equivalent and the completion of a 90-day on the job training program	Refer to Section 3.1.3	X			X	X	X	X		X			X	
Equipment Operators	Fulfill the duties described in Section 3.1.4 as well as a minimum of 6-months of experience or the completion of a 90-day on the job training program	Refer to Section 3.1.4	X			X	X	X	X	X	X		X	X	X
Spotters and Laborers[1]	Fulfill the duties described in Section 3.1.5 as well as the completion of a 90-day on the job training program	Refer to Section 3.1.5	X			X	X	X	X	X	X		X	X	X
Mechanics	Fulfill the duties described in Section 3.1.6 as well as the completion of a 90-day on the job training program	Refer to Section 3.1.6	X				X	X		X					

Position	Minimum Qualifications	Job Description	Required Training Topics												
Special Waste Department[2]	Special Waste Liaison/ Compliance Coordinator shall have a minimum of 6 months experience performing the duties described in Section 3.1.8	Refer to Section 3.1.8	X			X			X					X	

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

4.0 EQUIPMENT

30 TAC §330.127(2)

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

The equipment listed in Table 4-1 will be available for use at the facility. Equipment requirements may vary in accordance with the method of landfill operations or the waste acceptance rate at any given time. Additional equipment will be provided by Victoria Landfill TX, LP as required for increasing volumes of incoming solid waste. Other equivalent types of equipment by other manufacturers may be substituted on an as-needed basis, at the discretion of the Landfill Manager. The equipment and Scale House will be equipped with fire extinguishers. Backup equipment will be made available to City of Victoria Landfill on an as needed basis from other area Allied landfills or other sources. Backup equipment is available for each piece of equipment identified in Table 4-1.

Compactors will be used for spreading and compacting the refuse. An excavator and hauling trucks will be used for various purposes at the Landfill, including excavating the cover material used in site operations and in firefighting support. The dozer is mainly used to spread waste at the active face, spread cover material, and assist with waste compaction. The motor grader will be used for activities such as road maintenance, ditch construction, surface water control, and final grading of the completed fill areas. The water truck(s) will be used for dust control and moisture conditioning of soil materials, as necessary, and will be utilized, if necessary, in the event of a fire at the facility. The water truck(s) will be equipped with appropriate equipment to facilitate firefighting. The windscreens and temporary litter fencing will be used to control windblown waste and litter as discussed in Section 7.5. The maintenance truck will be used to provide service to the other site operating vehicles. In addition to the above, miscellaneous pick-ups, vans, and other light utility vehicles as well as instruments and safety and training equipment will be on-site as necessary to assist with site operations.

For information relating to methane monitoring at the Landfill, see the Part III, Attachment 8 - Landfill Gas Management Plan. For information relating to leachate monitoring, and the control of contaminated water, see the Part III, Attachment 3 - Leachate and Contaminated Water Plan. Other miscellaneous equipment will be required for the maintenance of the machinery and other duties. This equipment will be kept in a maintenance building at or near the Landfill and will include a compressor, power equipment, and tools.

Table 4-1: Equipment Dedicated to the City of Victoria Landfill

Equipment	Minimum Number of Equipment Needed for Each Range of Waste Volume[1]				Typical Size[1]	Function
	0 – 1,500 TPD[4]	1,500 – 3,000 TPD[4]	3,000 – 6,000 TPD[4]	6,000 – 10,000 TPD[4]		
Compactor(s)	1	2	2	3	70,000 lbs	Trash compaction
Dozer(s)	1	1	2	3	150 hp or 35,000 lbs	Movement and placement of refuse and soil. May also be used to assist with waste compaction.
Articulated Dump Truck	1	1	2	2	Up to 40 tons	Excavation and hauling of soil
Excavator	1	1	2	2	10 ft reach	Excavation of soil, firefighting support
Motor grader	1	1	2	2	50 hp	Maintenance of interior roads
Pickup Truck(s)	1	2	3	4	¼ ton	Personnel use for litter control, maintenance
Water Truck(s)	1	1	2	2	2,000 gallons	Dust control, compaction of earth fills, firefighting support
Maintenance Truck(s)[2]	1	1	2	2	¼ tons	Equipment maintenance
Pumps with Hose	1	1	1	1	2” to 6” diameter pump	Pumping of stormwater
Street Sweeper	1	1	1	1	5’ broom	Cleaning of site roads
Light Plant[3]	1	1	1	1	(2) 250 watt fixtures	Adequate lighting at active face
Wind Screens	6	8	10	15	8’x8’	Active face litter control
Temporary Litter Fencing	175 ft	275 ft	375 ft	425 ft	4 ft high	Active face litter control

[1] Number, types, and equipment manufacturers will vary based on operational needs. TPD = tons per day.
[2] As an alternative, the site may contract equipment maintenance with a third party. Under this scenario, maintenance equipment would only be on-site, as needed.
[3] Only needed if site operates during low or no natural light conditions.
[4] The waste volume will be determined by the sum of waste acceptance listed on the previous four TCEQ quarterly summary reports (as required by 30 TAC §330.125(h)).

5.0 PROHIBITED WASTES

30 TAC §330.127(5)

5.1 General

In accordance with the Environmental Protection Agency (EPA's) Resource Conservation and Recovery Act (RCRA) Subtitle D criteria, 40 Code of Federal Regulations (CFR) 258.20, and 30 TAC §330.127(5), the City of Victoria Landfill will implement a program to exclude prohibited wastes as defined in 30 TAC §330.15(e), including but not limited to, regulated hazardous waste as defined in 40 CFR 261 and PCB waste as defined in 40 CFR 761and 30 TAC §330.3. Consistent with applicable portions of these regulations (and other TCEQ applicable regulations, such as §330.171 and §335 Subchapter R) only non-regulated material that contains PCBs, which have a PCB content of 50 parts per million (ppm) or less, can be accepted for disposal at the Landfill without prior approval from the TCEQ. The program will include 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 will be provided for site personnel, and what procedures are required in the event of identification of prohibited wastes (as defined in Part I/II Section X). The detection and exclusion program at the City of Victoria Landfill will include at least the following steps:

- Inform customers of the types of waste that are excluded from disposal.
- Inform vehicle drivers and transfer station operators of the wastes that are to be excluded.
- 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 receipt or disposal of regulated hazardous or PCB waste at the landfill.
- Provisions for remediation of the incident as described in Section 5.5.

5.2 Load Inspection Procedure

As noted in Section 7.2, Scale House Staff, Equipment Operators, Laborers, and Spotters will monitor the incoming waste. Should any indication of prohibited waste be detected, the Landfill Manager, or their designee, will conduct a thorough evaluation of the load. The driver will be directed to a load inspection area located at or near the working face where the load will be discharged from the vehicle. The inspector will break up the waste pile and inspect the material for any prohibited waste. If prohibited wastes are detected, they will be managed in accordance with Section 5.5.

In addition to inspecting suspicious loads, random inspections will be undertaken in accordance with 30 TAC §330.127(5)(A). Random inspections will be supervised by the Landfill Manager or designee. Random inspections of incoming loads will include the inspection of compactor vehicles. Staff conducting random inspections will receive training on the random inspection procedures in this plan and instruction on the recognition of regulated hazardous waste and PCB waste. Random inspections will be conducted at or near the working face to facilitate disposal of authorized waste after random inspections have been completed.

Except as provided herein, all waste loads will be subject to random inspections. At least one vehicle per full day that the site is in operation shall be scheduled for a random inspection. The Landfill Manager shall determine the procedure for the random selection of the waste hauling vehicle that will be selected. The following criteria shall be utilized in the development of the selection procedure:

- The random selection procedure shall objectively select a waste hauling vehicle each full day that the facility accepts waste.
- The random selection procedure shall ensure that waste hauling vehicles are selected at varying times during the appropriate days of each week.
- The random selection procedure shall apply to all non-excluded waste hauling vehicles that transport waste to the site.

If inclement weather or other conditions precludes the random inspection from being performed on the scheduled day, the delayed random inspection shall be performed at the same scheduled time on the next full day that the site is operating. Thus, if a scheduled random inspection is delayed, there will be two random inspections performed the next operating day.

The loads which are excluded from random inspections are listed below:

- Waste from transfer stations (meeting the criteria stated below)
- Regulated asbestos-containing materials (RACM)

The City of Victoria Landfill may accept waste from transfer stations. Wastes received from transfer stations will not be screened at the site if the transfer station is permitted or registered by the TCEQ and random screening procedures are conducted at the transfer station. Copies of the transfer station TCEQ permit or registration number and a letter certifying that random waste screening is conducted at the transfer station will be included in the documentation for transfer station loads excluded from random

inspection procedures. Transfer station loads not meeting these criteria and vehicles containing special waste will be subject to random inspections.

Inspections at or near the working face will be conducted away from: 1) turn around areas and 2) normal travel routes. Spreading of the waste for inspection may be accomplished by using mechanized equipment or hand implements. Inspectors shall observe the waste materials from each load as the waste discharged from the truck is spread and separated. The waste shall be sufficiently spread to determine its character and composition. Inspectors shall wear appropriate personal protective equipment during the inspection which includes, at a minimum, the following:

- Gloves;
- Work boots;
- Clothing which minimizes contact of waste;
- High visibility clothing; and
- Hardhat.

Additional personal protective equipment will be used if regulated hazardous waste or PCB waste is identified. If regulated hazardous waste or PCB waste is identified during an inspection, waste inspection activities shall cease until inspection personnel obtain sufficient protective equipment, if needed. This additional equipment may include:

- Respirator with appropriate cartridge filters (e.g., organic vapor or particulate);
- Tyvek suit or coveralls; and
- Eye protection.

5.3 Recordkeeping

The Landfill Manager is required to maintain and include in the Site Operating Record the following:

- Load inspection reports;
- Reports on quantities and disposal of authorized waste;
- Records of regulated hazardous or PCB waste notifications sent to TCEQ; and
- Personnel training records.

Load inspection reports, recorded on standardized forms, will be completed for each inspected load. The reports should include; at a minimum, the date and time of inspection, the name and address of the hauling company and driver, the size of the load, indicators of prohibited waste (if any), and results of the

inspection. A copy of an example load inspection report form is included in Appendix A – Example Load Inspection Report Form. The actual form that will be used at the time of inspection may vary from the sample provided, but must contain at least the information specified in this paragraph.

The TCEQ will be notified within 24 hours whenever regulated hazardous or PCB waste is detected. Records of the notification will be kept in the Site Operating Record and will include the date and time of notification, the individual contacted, and the information reported.

5.4 Training

Individuals responsible for inspecting incoming loads shall receive at least annual training in the provisions and procedures of this section (refer to Section 3.2 for additional information). Training shall be conducted by site employees or contract personnel experienced in waste inspection and detection requirements. Training shall be scheduled, and attendance will be recorded. The training outline shall incorporate the requirements and procedures of this section. Training shall include state and federal laws and regulations for managing prohibited waste. The training will at a minimum include the following topics:

- Safety requirements during inspection procedures;
- Wastes prohibited from disposal at the site;
- Methods of identifying prohibited wastes;
- Various labels used for waste identification;
- Safety procedures if prohibited wastes are encountered; and
- Procedures for managing prohibited wastes encountered.

Documentation of training will be placed in the Site Operating Record.

5.5 Managing Prohibited Wastes

Unknown wastes undergoing analysis by Landfill personnel must be properly segregated and protected against the elements, secured against unauthorized removal, and isolated from other waste and activities.

Prohibited waste that is not discovered until after it is unloaded shall be promptly returned to the vehicle that delivered the waste. That party shall be responsible for the proper disposal of this rejected waste at a permitted facility. In the event the unauthorized waste is not discovered until after the vehicle that delivered it is gone, the waste shall be segregated and controlled to the extent possible. The unauthorized waste will be either (1) covered with soil and no additional filling will occur over that area until the unauthorized waste is removed and properly disposed; survey stakes or similar markings will be placed

around the perimeter of the area that contains the unauthorized waste so that it is clear where the unauthorized waste is located or (2) the unauthorized waste may be segregated by placing the unauthorized waste into a roll-off or similar container. An effort shall 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. If identification is not possible, the Landfill Manager (or other personnel identified or delegated by them) will notify the TCEQ and seek guidance on how properly to dispose of the waste within 24-hours.

If regulated hazardous waste or PCB wastes are detected, the TCEQ will be notified. The transporter will be required to remove the regulated hazardous waste or PCB waste from the site immediately upon detection. Prior to removal, the transporter must obtain an EPA identification number, package the waste in accordance with Texas Department of Transportation (TxDOT) regulations, and properly manifest the waste designating a permitted facility to treat, store, or dispose of the hazardous waste.

5.6 Managing Mishandled or Undeclared Special Waste

If a mishandled or undeclared special waste is not discovered until after it is unloaded, site personnel will notify the Landfill Manager. The special waste will be segregated and controlled by either (1) covering with soil and no additional filling will occur over that area until the special waste is removed and properly disposed; survey stakes or similar markings will be placed around the perimeter of the area that contains the special waste so that it is clear where the special waste is located or (2) the unauthorized waste may be segregated by placing the unauthorized waste into a roll-off or similar container. The Landfill Manager will then develop a plan to properly dispose of the mishandled or undeclared special waste material consistent with the approved special waste handling procedures outlined in Section 7.20.

6.0 FIRE PROTECTION PLAN

30 TAC §330.129

This Fire Protection Plan addresses each operational activity that stores, processes, or disposes of combustible materials. These areas at the City of Victoria Landfill include:

- Each unloading area (MSW or Class 1 Non-Hazardous Industrial Waste (NHIW) Unloading Area, and RACM Unloading Area);
- Vehicles and heavy equipment used at the site; and
- On-site structures (Scale House and Maintenance Building).

6.1 Working Face(s) Fire Protection Plan

6.1.1 Working Face Fire Protection Requirements

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

- Maintain a source of earthen material large enough to cover the working face with six-inches of earth material within one-hour of detecting a fire; or
- An alternate method that is approved by the Executive Director of the TCEQ.

The plan set forth in this section provides an alternate method to the prescriptive fire protection plan included in the first bullet listed above. This plan utilizes both water and earthen material (as well as fire extinguishers for small fires) to provide fire protection for each working face. This alternate plan provides a more comprehensive fire protection plan than the prescriptive plan. By keeping a water source at the working face, the site will be able to fight and control fires more effectively than just by covering working face fires with soil. For example, fires can be controlled much quicker with the application of water as soon as a fire is detected rather than having to move equipment to cover the burning area with soil.

6.1.2 Working Face Fire Fighting Plan

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

- If the area of burning waste is small (i.e., an area of 10 feet by 10 feet or less) and is a surface fire, it will be extinguished using a fire extinguisher located on the equipment at the working face. After the fire is extinguished, the affected portion of the working face will remain closed while

the area is inspected to verify the fire is completely extinguished. Inspection of the fire area will be conducted by the Landfill Manager or their designee.

- The burning waste material will be removed (i.e., "cut out" of the working face by a dozer or similar equipment) from the working face to an area where it can be covered with six inches of soil. The water truck may also be used to extinguish the burning waste. The working face area in which the burning waste was removed will also be covered with six inches of soil. The affected portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Contaminated water will be managed as specified in the Part III, Attachment 3 - Leachate and Contaminated Water Plan. Inspection of the fire area will be conducted by the Landfill Manager or their designee.
- The burning waste material within the working face will be sprayed with water from one of the water trucks (or tanks) stationed at the working face. The working face area which contained the burning waste will be covered with six inches of soil to smother the fire. Upon extinguishing a fire at the working face through smothering with soil, that portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Water that is used to fight the fire will be contained by the contaminated water containment berm. Contaminated water will be managed as specified in the Part III, Attachment 3 - Leachate and Contaminated Water Plan. Inspection of the fire area will be conducted by the Landfill Manager or their designee.
- The burning waste material within the working face will be sprayed with water from one of the water trucks (or tanks) that will be in an area no more than two to three minutes from the working face. Then the burned (or burning) waste material will be removed from the working face to an area where it can be covered with six inches of soil. The working face area in which the burning waste was removed will also be covered with six inches of soil. The affected portion of the working face will remain closed while the area is inspected to verify the fire is completely extinguished. Water that is used to fight the fire will be contained by the contaminated water containment berm. Contaminated water will be managed as specified in the Part III, Attachment 3 - Leachate and Contaminated Water Plan. Inspection of the fire area will be conducted by the Landfill Manager or their designee.

In each case listed above, after the Landfill Manager or their designee confirms that the fire has been extinguished, then waste filling operations in that area may resume.

6.1.3 Water Trucks or Storage Tank Requirements

A water source will be maintained near each working face (either a water truck or storage tank) in accordance with the requirements in Table 6-1. The water truck or tank will be equipped with a water cannon and positioned to assist with the fighting of any potential working face fire.

Table 6-1: Requirements for Water by Working Face Size

Maximum Working Face Size[1] (width by length)	No. of Water Trucks or Tanks (minimum capacity of 2,000 gallons)
150 feet by 175 feet (or 26,250 sf)	1
250 feet by 325 feet (or 81,250 sf)	1
350 feet by 425 feet (or 148,750 sf)	2
450 feet by 525 feet (or 236,250 sf)	3

[1] See Table 7-1 for working face size based on incoming waste tonnage.

The on-site stormwater detention ponds may also be used as a source of water for fire control. In addition, the water level in the tank(s) will be verified once per day to ensure that each tank(s) contains at least 2,000 gallons of water. Also, during periods of freezing temperatures, measures will be taken to ensure that the tank(s) remain operational.

As noted in Section 6.1.2, the water trucks or tanks will be used to both keep a fire from spreading and to extinguish fires. The additional water trucks used for site operations (refer to Table 4-1) will also be available to assist with firefighting activities. Each water truck or portable tank will be refilled, as needed, to provide a constant source of water at the working face for firefighting purposes.

6.1.4 Soil Stockpile Requirements

A soil stockpile will be maintained within 1,000 feet of each working face. The stockpile will be used to (1) smother burning waste material at the working face or (2) placed over burning waste material that has been cut out of the working face. The stockpile will be sized to cover 25 percent of the size of each working face. In addition, enough earthen material (i.e., soil stockpiles and soil within borrow areas) will be maintained on-site to cover the entire working face within 24-hours. The earthen material requirements are listed in Table 6-2.

Table 6-2: Requirements for Earthen Material by Working Face Size

Size of Working Face (square feet)	Earthen Material Volume Requirements		
	To Cover the Working Face Area with 6-inches of Soil	To Cover the Working Face Area with 6-inches of Soil	To be Maintained within 1,000 feet of the Working Face
26,250	13,125 ft^3	486 CY	122 CY
81,250	40,625 ft^3	1,505 CY	377 CY
148,750	74,375 ft^3	2,755 CY	689 CY
236,250	118,125 ft^3	4,375 CY	1,094 CY

Old stockpiles, which have been replaced, may be used as daily cover or intermediate cover. At least monthly, the Landfill Manager, or their designee, will evaluate the maximum anticipated working face area for the current conditions (refer to Table 7-1 for the specified range of working face areas) and will evaluate the available soil stockpile volume and location for sufficiency. This evaluation (and the evaluation of needed equipment) will be maintained in the Site Operating Record. The maximum anticipated size of the working face shall be calculated and a minimum volume of earthen material (i.e., soil stockpiles or soil within borrow areas) shall be determined to cover the maximum anticipated working area for each working face, with at least one day application of six inches of daily cover. The volume of earthen materials available shall be estimated by determining the cubic yards of material hauled or placed during the creation of the stockpile or measuring the current stockpile or borrow area dimensions and applying appropriate geometric volume formulas. Each evaluation will be documented in the Site Operating Record. The minimum equipment listed in Table 4-1 will provide for sufficient equipment to transport and spread soil from the stockpile or borrow area to the working face.

6.2 Fire Protection Training

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

- Detailed review and discussion of the Fire Protection Plan;
- Training on fire prevention and hazard awareness;
- Specific instruction on operation of a portable fire extinguisher;
- Instruction on the properties of methane gas and proper safety procedures; and
- Facility evacuation procedures.

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

6.3 Fire Protection Standards

6.3.1 Posted Information

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

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

6.3.2 Fire Safety Rules

The following fire safety rules will be posted at the scale house:

- Do not attempt to fight fire alone;
- Be familiar with the use and limitations of fire-fighting equipment;
- Alert other facility personnel in the area;
- Assess extent of fire and likelihood that the fire will spread;
- Contact the local fire department at 911; and
- Attempt to contain or extinguish the fire until the fire department arrives if the fire can be safely fought with onsite fire-fighting equipment.

6.3.3 Burning Waste Loads (Hot Loads)

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

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

In the event of a fire within a vehicle, if possible, the vehicle will be brought to a safe stop away from any fuel storage area or exposed waste. The vehicle or equipment will be driven away from the working face and the load ejected in the hot load area, which is any space, preferably at least 50 feet away from a road, with either no waste deposited (e.g., a soil borrow area) or an approved waste fill area with at least six

inches of soil cover. A water truck, bulldozer, or other equipment will be used to extinguish the burning waste load. The waste will be covered with an adequate amount of soil to ensure it is extinguished. The load will be inspected by the Landfill Manager, or their designee, before disposal. During inspection, if the soil is removed, which would allow oxygen to contact the waste, the load will be observed for hot spots or flare-ups. No smoldering or smoking waste will be placed in the working face area for permanent burial until all hot spots or flare-ups have been extinguished. The Landfill Manager will verify that (1) the waste is properly covered with six inches of daily cover if the hot load was ejected over an approved waste fill area or (2) all the waste and any water that contacted waste is removed from the hot load ejection area if this area was not over an approved waste fill area.

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

6.4 Accidental Fires

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

6.5 Preventive Procedures

Fuel spills will be controlled immediately. Soil contaminated with spilled fuel will be excavated and, if authorized pursuant to Section 7.20.1, disposed of at the working face. Contaminated soils may be excavated using shovel or with heavy equipment.

Onsite brush and vegetation will be controlled through mowing at least annually to reduce the possibility of brush fires from spreading to the landfill or off-site.

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

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

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

6.6 Vehicle or Equipment Fire

If equipment or other site vehicles experience a fire, the operator will attempt to bring the vehicle or equipment to a safe stop, away from fuel supplies, uncovered solid wastes, and other vehicles. The operator will attempt to shut off the engine and engage the brake. Lowering of any implements should be attempted to prevent subsequent movement of the vehicle.

6.7 Structure Fire

The local fire department will be called at 911 for all structure fires. No site personnel will enter a structure on fire.

6.8 RACM Area

A soil stockpile of at least 50 cubic yards (yd^3) will be maintained within 100 feet of the RACM disposal area. This stockpile will cover the 50-ft by 50-ft maximum disposal area size with six inches of soil.

In the event of a fire at the facility, the Landfill Manager, or their designee, if needed, will call 911 or the local fire department, and report the fire. If firefighting assistance is needed from the local fire department, the Landfill Manager will also notify Scale House Staff, who will direct the fire department personnel to the scene of the fire.

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

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

7.0 OPERATIONAL PROCEDURES

30 TAC §330.131 through §330.179, §335.585 through §335.589

7.1 Access Control [30 TAC §330.131]

Public access to the waste fill area is controlled by the entrance facility, which houses the Scale House Staff, located in the northwest portion of the facility. The site entrance facilities are staffed during hours of operation. The Scale House Staff controls access and monitors all vehicles entering and exiting the site.

7.1.1 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 with perimeter fencing (minimum four foot high, three strand barbed wire fences), gated entrance, and a closed-circuit television system that monitors the entrance and exit. Radio communications will be used around the site for security and operation purposes. The perimeter fence and gate will be inspected every week. Repairs and maintenance will be performed, as necessary. Refer to Section 7.23 for site inspection and maintenance schedule.

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

Entry to the active portion of the site will be restricted to designated personnel, approved waste haulers, and properly identified persons whose entry is authorized by City of Victoria Landfill management. Visitors will be allowed on the active area only when accompanied by a site representative (note that third party contractors and vendors completing construction or monitoring activities will not be considered visitors for the purpose of access control).

7.1.2 Traffic Control

Access to the Landfill is currently provided by Farm to Market Road (FM) 1686 via Texas Highway 185 or U.S. Highway 87. Texas Highway 185, and U.S. Highway 87 have no weight loading restrictions, beyond the legal limit of 80,000 pounds per vehicle as prescribed by law. The current load rating of FM 1686 is 58,420 pounds, which is adequate to handle existing waste vehicles which have a gross weight of approximately 45,000 to 54,000 pounds. The Landfill entrance facilities are located approximately 1.5 miles northeast of the intersection of FM 1686 and Texas State Highway 185. It is estimated that at peak filling rates, the maximum truck traffic to the site will be approximately 100 vehicles per day.

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

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

7.2 Unloading Wastes [30 TAC §330.133]

7.2.1 Unloading Areas

The City of Victoria Landfill accepts general municipal solid wastes as well as brush, rubbish, construction/demolition waste, and certain special wastes outlined in Section 7.20. Additionally, cells within the lateral expansion area (Cells A1 through I2) have the option to be constructed in accordance with 30 TAC §330.331(e) to accept Class 1 NHIW for below-grade disposal. Wastes are disposed of at the following unloading areas at the City of Victoria Landfill.

- MSW or Class 1 NHIW Unloading Area or Working Face. The working face includes areas where waste is being deposited for disposal but has not been covered with daily or intermediate cover.
- RACM Unloading and Disposal Area. The RACM unloading area will be designated by the Landfill Manager as noted in Section 7.20.4.

Class 1 NHIW accepted at the facility will only be placed in dedicated cells which have been constructed in accordance with 30 TAC §330.331(e). The designated landfill personnel will identify appropriate locations for Class 1 disposal prior to unloading. An active working face for MSW and for Class 1 NHIW will be clearly identified by directional signs. Solid waste dumping is controlled to prevent disposal in locations other than those specified by site management.

7.2.2 Waste Excluded from Disposal at the Site

The following wastes (as defined in Appendix I/II-C – Waste Acceptance Plan) are specifically excluded from disposal at the site and unloading of these wastes will not be allowed:

- Untreated medical waste. This prohibition may be superseded by the executive director in writing when disposal of untreated medical waste is required to protect human health and the environment from the effects of a natural or man-made disaster [§330.171(c)(1), §330.3(85)];
- Lead-acid storage batteries [§330.15(e)(1)];
- Used motor vehicle oil [§330.15(e)(2)];
- Used oil filters from internal combustion engines except for used oil filters from households that have been processed as described in §330.171(d) [§330.15(e)(3)];
- Whole used or scrap tires [§330.15(e)(4)];
- Items containing CFCs that have not been handled in accordance with 40 CFR §82.156(f) [§330.15(e)(5)];
- Bulk or noncontainerized liquid waste unless the waste is household waste other than septic waste and as defined by the Paint Filter Test, EPA Method 9095 [§330.15(e)(6), §330.3(81)];
- Containers holding liquids unless: the container is similar in size to those found in household waste, the container is designated to hold liquids for other than storage, or the waste is household waste [§330.15(e)(6), §330.3(81)];
- Regulated hazardous waste [40 CFR §261.3] that is not excluded from regulation as a hazardous waste [40 CFR §261.4(b)] or that was not generated by a conditionally exempt small-quantity generator [§330.15(e)(7), §330.3(127)];
- Waste that exhibits the characteristics for hazardous waste [40 CFR §261.3] from oil, gas, and geothermal activities subject to regulation by the Railroad Commission of Texas [§330.15(e)(7)];
- Polychlorinated biphenyl (PCB) wastes, [40 CFR Part 761] unless authorized by the United States Environmental Protection Agency [§330.15(e)(8)]; and
- Radioactive materials, [Chapter 336] except as authorized in Chapter 336 or that are subject to an exemption of the Department of State Health Services [§330.15(e)(9)].

7.2.3 Waste Unloading Procedures

Scale House Staff, Equipment Operators, Laborers, and Spotters will monitor the incoming waste. Scale House Staff control site access and monitor incoming vehicles for unauthorized wastes by (1) receiving manifests and other shipping documents, (2) recording incoming waste loads, (3) completing a visual inspection of the vehicle (including a video camera inspection of the top of the vehicle's contents), and (4) interviewing the driver, as necessary. Any nonconforming issues will be reported to the Landfill Manager. The Landfill Manager will work with the Scale House Staff and other company resources (e.g., Special Waste Liaison/Compliance Coordinator or the Environmental Manager) to resolve any non-conforming issues. If the non-conforming issues involve Special or Industrial wastes, the Landfill Manager and Scale House Staff will review Sections 7.20 and 5.2 to verify that all requirements for acceptance of Special and Industrial waste have been met before the material is accepted for disposal. The procedures for handling prohibited waste that is not discovered until after it is unloaded are discussed in Section 5.6.

Laborers, Spotters, Equipment Operators, or other field personnel will be always present at the working face to monitor each incoming load of waste. These personnel will be familiar with the rules and regulations governing the various types of waste that can or cannot be accepted into this facility and will be trained to identify prohibited wastes before being assigned to this task (refer to Section 3.2 for training procedures). The personnel will also be trained and have a basic understanding of both industrial and hazardous waste and their transportation and disposal requirements. The Spotters and Equipment Operators have the authority and responsibility to reject unauthorized loads, have unauthorized material removed by the transporter, and have the unauthorized material removed by on-site personnel or otherwise properly managed by the facility. A record of unauthorized material removal will be maintained in the operating record.

Solid waste unloading will be controlled to prevent disposal in locations other than those specified by site management. For example, random load inspections will be conducted as outlined in Section 5.2 of this SOP. Any allowable waste deposited in an unauthorized area will be immediately removed and disposed of properly at the current working face. The Spotters and Equipment Operators or other site personnel will actively investigate any approved waste haul vehicles that do not dispose of their waste in an authorized area. If an authorized load of waste has been deposited in an unauthorized area, site personnel will notify the Landfill Manager and the waste load will be promptly relocated to the authorized working face area.

7.2.4 Maximum Size of the Unloading Area

As discussed previously, the following unloading areas exist at the City of Victoria Landfill.

- MSW Unloading Area or Working Face;
- Class 1 NHIW Unloading Area or Working Face; and
- RACM Unloading and Disposal Area

The MSW and Class 1 NHIW unloading and working face areas are discussed below. The RACM unloading area is discussed in Section 7.20.4.

Control(s) will also be used to confine each working face to as small an area as practical consistent with the rate of incoming waste and safe and efficient working face operations. The maximum size of each working face will be limited to the area listed in Table 7-1 for a range of waste accepted at the facility.

Table 7-1: Maximum Working Face Size[1]

Incoming Waste[2] Accepted (TPD)	Maximum Working Face Size[3,4,5] (width by length)
0 – 1,500	150 ft by 175 ft (or 26,250 sf)[6]
1,500 – 3,000	250 ft by 325 ft (or 81,250 sf)[6]
3,000 – 6,000	350 ft by 425 ft (or 148,750 sf)[6]
6,000 – 10,000	450 ft by 525 ft (or 236,250 sf)[6]

[1] Typically only two working faces will be utilized (one for MSW and one for Class 1 NHIW). However, a third working face may be used in some cases (e.g., during a time when the active face is transitioned to a new cell). Additional equipment will be brought to the site if more working faces are in operation (e.g., one compactor, one dozer, additional wind screens will be used per working face).
[2] For the maximum working face size, the incoming waste tonnage accepted will be determined by the sum of waste acceptance listed on the previous four TCEQ quarterly summary reports.
[3] The working face maximum size listed above is based on the maximum area needed to spread and compact waste in uniform lifts. The working face does not include areas used to move waste from a MSW Tipper to the working face.
[4] During the placement of the first lift of MSW in a newly constructed cell. the maximum working face size listed above does not apply if odors, vectors, and windblown litter are controlled consistent with standard operating conditions.
[5] The maximum working face size listed above does not apply to areas that have less than a six-foot thick waste column left before the final permitted grades are achieved provided that odors, vectors, and windblown waste are controlled consistent with standard operating conditions.
[6] The width and length shown above is for guidance purposes only. The maximum working face size will be governed by the area listed above.

The working face includes areas where waste has been deposited for disposal but has not been covered with soil. The working face includes areas that are covered with ADC and the area where waste collection vehicles deposit waste onto the working face. As discussed in Part III, Attachment 3 – Leachate and Contaminated Water Plan, the working face area is surrounded by a contaminated water containment berm and stormwater diversion berm. The area within the containment and diversion berms includes the following.

- Working Face Area (as defined above);
- Waste Collection Vehicle Access Area (area where waste collection vehicles access the working face); and
- Contaminated Water Storage Area (as noted in Part III, Attachment 3 – Leachate and Contaminated Water Plan, this area is designed to contain stormwater that has contacted the working face)

7.2.5 Prohibited Waste

Prohibited wastes are those discussed in Section 7.2.2 (as defined in Appendix I/II-C – Waste Acceptance Plan). Prohibited wastes will be excluded from disposal at the site and unloading of these wastes will not be allowed. Prohibited Wastes will be identified and managed consisted with the methods and procedures described in Section 5.0.

7.3 Hours of Operation [30 TAC §330.135]

The City of Victoria Landfill is permitted to be open for waste acceptance seven days a week from 7:00 am to 7:00 pm except on scheduled holidays. Hours of waste acceptance and heavy equipment operation may vary depending on incoming volumes of waste. The operating hours will be posted on the site entrance sign. Transportation of non-waste materials and heavy equipment operation can occur between the hours of 5:00 am and 9:00 pm seven days per week (this includes all construction-related activities).

The site may also operate up to five days per year with extended waste acceptance hours to accommodate additional waste inflow due to a holiday or special event. During these five days, the waste acceptance hours will be expanded to 5:00 am to 8:00 pm. These days are identified as the days after Christmas, New Years Day, Memorial Day, Labor Day, and the Fourth of July. Additional temporary waste acceptance or operating hours may be requested from the TCEQ Regional Office to address disasters, other emergency situations, or other unforeseen circumstances that could result in the disruption of waste management services in the area. The site will notify the TCEQ Regional Office prior to each extended hour day as well as record the dates and times of the extended hour day in the Site Operating Record.

7.4 Site Signs [30 TAC §330.137]

A sufficient number of signs that are readily visible will be utilized for proper management and operation of the City of Victoria Landfill. A sign will be displayed at the entrance to the site. This sign will be readable from the site entrance, will measure at least 4 feet by 4 feet, and have lettering of at least 3 inches in height that state the name of the site, type of site, hours and days of waste acceptance, the TCEQ permit number, and local emergency fire department phone number. The sign displayed at the site

entrance will also list emergency 24-hour contact phone number(s) that reach an individual with the authority to obligate the facility at all times that the facility is closed. The Landfill Manager will be responsible for the accuracy of the information posted on the site sign. An additional sign will be posted containing a description of all excluded wastes.

Within the site, signs will be placed along the Landfill haul road and access road, beginning at the gated entrance, at a frequency adequate for users to be able to understand where disposal areas are, and which roads are to be used. Roads not being used for access to the working face will be blocked or otherwise marked for no entry. Signs with directional arrows and/or portable traffic barricades will help to restrict traffic to designated disposal locations. Signs will be placed along the access route to the current disposal area or other designated disposal areas that may be established. In addition, rules for waste disposal and prohibited waste will be prominently displayed on signs at the site entrance.

7.5 Control of Windblown Wastes and Litter [30 TAC §330.139]

Windblown wastes will be controlled at the City of Victoria Landfill by the following methods.

- Waste transportation vehicles using this facility will be required to use adequate covers or other means of containment. The adequacy of covers or containment of incoming wastes will be checked at the facility entrance. The Scale House Staff will visually inspect each vehicle entering the site to verify that the load is secured. A sign will be posted at the entrance indicating that vehicles shall be covered (or secured) or an additional fee will be charged. Vehicles attempting to enter the site with unsecured loads will be documented and the list can be provided to law enforcement officials, if necessary. An additional fee will be demanded from unsecured vehicles.
- Daily cover (e.g., soil or ADC) will be applied at least once every 24-hours to assist with the control of windblown waste. The working face size may be reduced by the application of daily cover to assist with the control of windblown waste.
- Portable fencing will be used for the confinement of windblown material in the areas adjacent to the working face. Such fences shall be located along the downwind length of the working face. The litter control fences will be constructed of screens attached to portable frames or other appropriate anchor methods. The litter control fence will be at least eight feet in height and will be located as close as practical to the active area to control windblown waste and litter.
- Temporary fencing may also be installed on the downwind side of the working face. The purpose of secondary fencing is to catch windblown waste that escapes the portable fencing discussed above. The temporary fence will either consist of additional portable fencing described above or will be constructed using metal or wooden posts and woven wire fence material, or netting. The

secondary fence shall have a minimum height of four feet and a minimum length of at least one hundred fifty feet (or matching the length of the working face as noted in Table 7-1). The Landfill Manager, or their designee, shall determine the appropriate fence location and actual length. Additional fences may be used as necessary for effective litter control based on the actual filling location, filling direction, wind direction, and wind speed. Any litter control fencing which is damaged by equipment or traffic shall promptly be repaired or replaced.

- Tall perimeter fencing may be used for the control of windblown waste and litter. Tall perimeter fencing may be installed between any waste filling area and the permit boundary. The tall perimeter fence shall be at least fifteen feet in height. The actual length and height of the perimeter fencing used will be determined by the Landfill Manager or their designee, based on the need for this additional litter control measure, filling location, average wind direction, average wind speed, height of fill above natural ground surface, and proximity of working face to the permit boundary.
- As part of the overall site maintenance program, facility personnel will collect windblown waste materials that may have accumulated throughout the site, on fences and gates, and onsite access roads a minimum of once a day that the site is in operation. Such waste will be taken to and disposed of at the working face. The collection of windblown waste will be an ongoing activity at the site each day the site is in operation.

7.6 Easements and Buffer Zones [30 TAC §330.141]

7.6.1 Easements

There is one easement located within the permit boundary belonging to Central Power and Light (CP&L) as shown in Part III, Attachment 1 - Drawing C001. No solid waste unloading, storage, disposal, or processing operations will occur within any easement at the City of Victoria Landfill. Also, no waste disposal is allowed within 25 feet of the centerline of an easement. Easements are or will be marked as specified in Section 7.7.

7.6.2 Buffer Zones

In accordance with §330.141(b), no solid waste unloading, storage, disposal, or processing operations will occur within any buffer zone at the City of Victoria Landfill. As shown in Part III, Attachment 1 - Drawing C001, the buffer zones vary around the perimeter of the site, but in no case are they less than 50 feet between all storage, processing or disposal areas and the permit boundary for previously permitted airspace, and in no case are they less than 125 feet from the newly permitted airspace and the permit

boundary. The buffer zones around the site will provide for the safe passage of firefighting and other emergency vehicles. All buffer zones will be clearly marked as specified in Section 7.7.

7.7 Landfill Markers and Benchmark [30 TAC §330.143]

Landfill markers will be installed to clearly mark significant features as described in §330.143(b). The markers will be steel (with plastic identification sleeves) or wooden posts (or other TCEQ approved material) and will extend at least six feet above the ground surface. The markers will not be obscured by vegetation and will be placed in sufficient numbers to clearly show the required boundaries. Markers will be installed with an offset where markers otherwise would not be visible. Markers that are removed or destroyed will be replaced within 15 days of their removal or destruction. Landfill markers will be inspected monthly to ensure they are installed and maintained in accordance with the requirements of this SOP and will be maintained and repaired as necessary. Refer to Section 7.23 for site inspection and maintenance schedule. Inspection results and repairs will be documented in the Site Operating Record. Markers will be repainted as needed to retain visibility. Guidelines for type, placement, and color-coding of markers are identified in Table 7-2.

Table 7-2: Landfill Markers

Marker	Color	Marker Placement
Site Boundary	Black	Placed at each corner of the site and along each boundary line at intervals no greater than 300 feet.
Buffer Zone	Yellow	Placed at each boundary corner and along each boundary line at intervals no greater than 300 feet.
Easement and Right-of-Way	Green	Placed along the centerline of an easement and along the boundary of a right-of-way at each corner within the facility and at the intersection of the facility boundary at intervals no greater than 300 feet.
Grid system	White	Placed no greater than 100 feet apart measured along perpendicular lines. Where markers cannot be seen from opposite boundaries, intermediate markers must be installed, where feasible.
SLER/GLER	Red	Placed so that all areas for which a SLER/GLER has been submitted and approved by the TCEQ are readily determinable.
Floodplain	Blue	Placed at intervals no greater than 300 feet or closer to retain visual continuity at any area within the 100-year floodplain.

The current site coordinate-based grid system will be used as shown in the Site Drawings package found in Attachment 1 of Part III. The grid system markers will be maintained during the active life of the site and will encompass at least the area expected to be filled within the next three-year period. The grid system must be installed unless written approval from the TCEQ has been received.

The SLER/GLER markers are to provide site workers immediate knowledge of the extent of approved disposal areas. These markers will be located so that they are not destroyed during operations until operations extend into the next SLER/GLER. The location of these markers will be tied into the landfill grid system. SLER/GLER markers will not be placed inside the constructed areas.

A permanent benchmark has been established at the site in an area that is readily accessible and will not be used for disposal. Coordinates and Elevation of Site Permanent Benchmark:

Latitude: 28° 41' 36" North
Longitude: 96° 54' 23" West
Elevation: 64.97 feet above mean sea level (amsl)

7.8 Control of Waste Spilled on Route to the Site [30 TAC §330.145]

The Landfill Manager or their designee will take steps to encourage that vehicles hauling waste to the working face or other unloading areas arrive on-site with a tarpaulin, net, or other means to properly secure the load (as discussed in Section 7.5). Signs stating this policy will be posted, and offenders may be reported to proper law enforcement by the Landfill Manager.

The City will be responsible for the cleanup of waste materials (e.g., solid waste material that has left the vehicle) along and within the right-of-way of all public access roads (i.e., FM 1686 and the portion of Texas State Highway 185 that is within two miles of the site entrance) serving the site for two miles in either direction from the entrance to the site. Cleanup for the spilled solid waste materials will be performed once per day that the site is open for waste acceptance. Laborers performing litter and spilled solid waste materials collection will be required to wear appropriate safety equipment.

The City will consult with TxDOT or other applicable local officials concerning cleanup of state highways and rights-of-way consistent with 30 TAC §330.145. The TxDOT District Office or other applicable local officials will be contacted to discuss the procedures for litter cleanup on, and within, rights-of-way along state highways in the vicinity of the site. If TxDOT will not allow access to their rights-of-way for litter cleanup, this documentation will be maintained in the Site Operating Record.

7.9 Disposal of Large Items [30 TAC §330.147]

Large, heavy, or bulky items may be disposed of at the working face or recycled at the large item salvage area. Items that can be classified as large, heavy, or bulky can include, but are not limited to, white goods (household appliances), air conditioner units, metal tanks, large metal pieces, and automobiles. Refrigerators, freezers, air conditioning units, or other items containing refrigerant (defined in 40 CFR

§82.152) shall be handled in accordance with 40 CFR §82.156, as amended. Items containing refrigerants will not be accepted unless the generator or transporter provides written certification that the refrigerant has been evacuated from the unit. Items such as electrical equipment, which contains PCBs, will be excluded from waste fill. Procedures for detecting and excluding PCBs are provided in Section 5.0.

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

Large, heavy, or bulky items which are not incorporated in the regular spreading, compaction, and covering operations of the Landfill will be recycled in a large-item salvage area. This area will be typically located near the site entrance. City of Victoria Landfill will remove recycled items as needed to prevent these items from becoming a nuisance and the discharging of any pollutants.

7.10 Air Quality and Odor Management Plan [30 TAC §330.149]

7.10.1 Air Quality

The site will comply with all the applicable air quality rules and regulations. The site is currently not required to operate and maintain the landfill gas collection and control system (GCCS) in accordance with the New Source Performance Standards (NSPS) for MSW landfills. However, a GCCS has been installed at the site.

The landfill is subject to TCEQ jurisdiction concerning outdoor burning and air pollution control. The site currently maintains an air operating permit (O-1451). The existing LFG flare was originally authorized by Standard Exemption No. 25191 approved by TCEQ on June 27, 1994.

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

- Accidental fires will be controlled as outlined in Section 6.4.
- Open burning of waste will not be permitted at this facility.
- Incoming waste will be promptly compacted into the working face area. Daily cover will be placed consistent with the procedures specified in Section 7.18.2.
- Ponded water at the site will be controlled as detailed in Section 7.19.
- The GCCS will be expanded and operated in accordance with all applicable requirements.

The site management team (e.g., Landfill Manager, Environmental Manager, and General Manager) will verify that City of Victoria Landfill does not violate any applicable air quality and/or LFG requirements (refer to Part III, Attachment 8 – Landfill Gas Management Plan for more information). The Environmental Manager is responsible for verifying and documenting compliance with the site's operating permit and any other applicable regulations. Current permits will be maintained in the Site Operating Record.

The site management team will maintain the required probe monitoring data and GCCS records as described in Part III, Attachment 8 – Landfill Gas Management Plan.

7.10.2 Odor Management

Odors shall be controlled at the site and will be reduced if they occur in accordance with this Odor Management Plan. Sources of landfill odor can vary considerably and may include the wastes being delivered to the landfill, the open working face, surface emissions from the covered portion of the landfill, or the leachate collection system. Many of the wastes received at a landfill are a source of odor upon receipt. Examples of these wastes include the following.

- Dead animals;
- Sludges; and
- Medical waste.

Other wastes have the potential for becoming a source of odor by their biodegradable characteristics, generating gases as they advance through the decomposition process. Leachate may also be a source of odor if not properly handled or disposed of in a timely manner. Among the measures that may be employed to reduce potential odors are the following.

- Minimize the size of the working face;
- Increase the thickness of daily cover applied to the working face;
- Prevent ponded water, consistent with the procedures outlined in Section 7.19;
- Place daily and intermediate cover to the specified thickness over the fill area. The City or their designee will visually inspect daily and intermediate cover areas to confirm that no trash is exposed, and no significant erosion of cover material has occurred;
- Assess the effectiveness of the GCCS and make all necessary repairs to the system or expand the system, as needed, to control odors;

- Identify any waste stream that requires special attention to control odor, including septage, grease trap waste, dead animals, and leachate. If the Scale House Staff notes a load with significant odors, they will notify the working face personnel. The load will be promptly covered with soil when it arrives at the working face;
- Inspect the leachate collection and storage system to confirm that it is functioning as designed (e.g., inspect piping and storage tank system to verify no leaks have occurred); and
- Evaluate the possible use or existing use of misters and chemical deodorizers when other controls do not reduce or eliminate significant odors. If it is determined that misters or deodorizers will help minimize odors, a permit modification will be submitted to TCEQ for approval.

The City or their designee will evaluate the perimeter of the site on days when the site is open for waste acceptance to assess the performance of site operations to control odors.

7.11 Disease Vector Control [30 TAC §330.151]

City of Victoria Landfill personnel will control on-site populations of disease vectors, which include rodents, excessive bird populations, flies, mosquitoes, and other insects or animals capable of transmitting diseases to humans. The primary means of control will be to prevent, inhibit, or deter vectors from coming into contact with deposited waste through proper waste compaction and daily cover application. Waste deposited at a working face area will be promptly compacted in accordance with Section 7.17. Daily cover will be applied at the end of each operating day in accordance with Section 7.18.2. A schedule of inspections is provided in Section 7.23 (refer to daily cover item which requires daily inspections of the working face for vectors).

If site inspections identify the need for additional vector controls, the site will implement a control program by contracting with a licensed commercial pesticide applicator, or other qualified pest control specialist to perform the following services:

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

7.12 Maintenance of Site Access Roads [30 TAC §330.153]

The City of Victoria Landfill has an existing paved entrance road as shown in Part III, Attachment 1 – Drawing C001. In addition, the landfill haul and access roads are constructed with a crushed-stone surface or similar material surface to provide for all weather access area from the unloading areas to public access roads. The paved entrance road and crushed-stone internal roads provide mud control for the waste hauling vehicles prior to exiting the site and returning to public access roads (i.e., mud on vehicles will "spin-off" on the access roads within the Landfill before the vehicle returns to the public access road). During wet weather conditions, the Landfill Manager or their designee will routinely inspect the site and implement measures to further minimize mud tracking onto public access roads, as necessary.

The landfill haul roads, and access roads will be maintained in a reasonable dust-free condition by periodic spraying from a water truck. During dry weather conditions, the Landfill Manager or their designee will routinely inspect the site and establish a frequency, if necessary, to spray the access roads with water to prevent nuisance conditions from developing.

Litter and other debris along the landfill haul and access roads will be removed and taken to the working face for disposal, consistent with the schedule requirements listed in Section 7.23 (i.e., litter or other debris will be picked up on a daily basis). Grading equipment will be used as necessary to control or remove mud accumulations on roads as well as minimize depressions, ruts, and potholes (at least once per week). In addition, all on-site and other access roadways will be maintained on a regular basis. Mud and assorted debris tracked onto public roadways will be removed once per day on days when mud and associated debris are being tracked onto public roadways to the extent that mud can be reasonably considered to be associated with landfill operations. A maintenance record regarding the inspection and regrading of the access roadways will be maintained by the Landfill Manager or their designee in the Site Operating Record. Refer to Section 7.23 for site inspection and maintenance list.

7.13 Salvaging and Scavenging [30 TAC §330.155]

For purposes of this SOP, salvaging is the removal of waste materials from the working face or waste hauling vehicles at the entrance for reuse or recycling. Salvaging will not be allowed to interfere with prompt sanitary disposal of solid waste or to create public health nuisances. Salvaging of Class 1 industrial or other special wastes received at the facility will not be salvaged.

Scavenging is the uncontrolled and unauthorized removal of materials at any point in the solid waste management system, including but not limited to, the removal of waste deposited at the working face or

active disposal area. Scavenging will be prohibited at all times. Various site personnel (e.g., Equipment Operators and Spotters) will guard against scavenging and unauthorized salvaging activities.

7.14 Endangered Species Protection [30 TAC §330.157]

No endangered or threatened species have been documented at the site nor has a critical habitat for such species been identified at the site. Neither the facility nor its operation will result in the destruction or adverse modification of the critical habitat of endangered or threatened species or cause or contribute to the taking of endangered or threatened species. If endangered or threatened species are encountered during site operations, Texas Parks and Wildlife and U.S. Fish and Wildlife will be notified within 48-hours.

An assessment of the potential effects of the proposed Landfill on threatened and/or endangered species was conducted based upon data available from the US Fish and Wildlife Service's Information for Planning and Conservation and the Texas Parks and Wildlife Department's Texas Natural Heritage Program. The existing Landfill permit demonstrated "no presently known occurrences of special species or natural communities in the general vicinity of the landfill." The September 2018 Endangered Species report (updated in February 2021) targeted to the lateral expansion area is provided in Appendix I/II - F. The evaluation shows that potential occurrence of federally listed species is unlikely, and a determination of "No Effect" to federally listed threatened and endangered species is appropriate. Suitable habitat for bald and golden eagles were not present within the Landfill area; therefore, a determination of "No Impact" for the bald and golden eagles is appropriate. As such, the construction and operation of the facility shall not result in the destruction or adverse modification of the critical habitat or cause or contribute to the taking of endangered or threatened species.

7.15 Control of Landfill Gas [30 TAC §330.159]

The control and monitoring of landfill gas for the City of Victoria Landfill will be in accordance with Part III, Attachment 8 – Landfill Gas (LFG) Management Plan (LFG Management Plan), which was developed in accordance with §330.371 and provides for required reports and other submittals to be included in the Site Operating Record and submitted to the Executive Director (refer to Section 2.0 for additional information).

As noted in the LFG Management Plan, monitoring for the presence of methane gas at the site will be conducted on a quarterly basis. In particular, the LFG monitoring probes will be monitored for the possibility of subsurface perimeter methane concentrations exceeding the lower explosive limit (LEL). Additionally, on-site structures will be checked to ensure that methane concentrations do not exceed 25

percent of the LEL. The allowable limits and details of gas recovery are more fully described in the LFG Management Plan.

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

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

7.16 Oil, Gas, and Water Wells [30 TAC §330.161]

There are two active water wells currently within the site boundary used as a non-potable source for the activities such as equipment washdown, dust control, fire suppression, and is not a drinking water source. Bottled water is provided for site personnel.

The Landfill Manager will provide written notification to the Executive Director of the location of any existing or abandoned water wells within the facility upon discovery during site development. Within 30 days of such a discovery, the Landfill Manager will provide written notification and certification to the Executive Director of the TCEQ that all such wells have been capped, plugged, and closed in accordance with all applicable rules and regulations of the TCEQ or other applicable state agency.

The Executive Director may approve any well used to supply water at the facility that is located within the permit boundary if it is determined that the well is outside the waste footprint, it is not impacted by landfill operations, it can be demonstrated that well design and installation will prevent any cross-contamination from the waste management unit to the water well production zone and between any water bearing zones, and an approved sampling plan to include frequency and parameters is in place.

For crude oil or natural gas wells, or other wells associated with mineral recovery that are under the jurisdiction of the Railroad Commission of Texas, the Landfill Manager will provide the Executive Director of the TCEQ with written notification of the location of any such well within 30 days after

discovery. Within 30 days after the plugging of any such well, the Landfill Manager will provide the Executive Director of the TCEQ with written certification that all such wells have been properly capped, plugged, and closed in accordance with all applicable rules and regulations of the Railroad Commission of Texas.

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

In the event that an abandoned well causes a change to the liner installation plan, a permit modification will be submitted to the Executive Director in accordance with 30 TAC §330.161(d).

7.17 Compaction of Solid Waste [30 TAC §330.163]

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

7.18 Soil Management, Placement, and Compaction of Daily, Intermediate, and Final Cover [30 TAC §330.165]

7.18.1 Soil Management

Soil will be obtained from onsite and offsite soil borrow sources as needed for facility operations. The earthen material for use as daily cover, intermediate cover, final cover, and other uses will be available for the site.

The earthen material will consist of soil that has not previously come in contact with waste and will be of sufficient volume to meet the fire protection requirements specified in Section 6.0. Both the volume of earthen material required to be maintained within 1,000 feet of each working face and the volume of earthen material to cover each working face with at least a one-day application of six-inches of daily cover will be documented on the Cover Application Log (refer to Section 7.18.6 and Section 6.1.4 for an example earthen material calculation).

7.18.2 Daily Cover

Daily cover of waste is used to control disease vectors, windblown waste, odors, fires, and scavenging and to promote runoff from the fill area. At the end of each operating day, the exposed solid waste fill area(s) will be covered by (1) at least six inches of well compacted soil cover material that has not been previously mixed with garbage, rubbish, or other solid waste, or (2) an approved Alternate Daily Cover (ADC) material.

An alternate daily cover operating plan is provided in Appendix C– Alternative Daily Cover Operating Plan. Consistent with 30 TAC §330.165(d)(1) the plan addresses the following:

- Description and thickness of the alternative cover material;
- Its effect on vectors, fires, odors, and windblown litter;
- The application and operational methods to be utilized at the site when using the alternative material;
- The chemical analysis of the material and/or the Material Safety Data Sheet(s) for the alternative material; and
- any other pertinent characteristics, features, or other factors related to the use of this alternative material.

Alternative daily cover may only be allowed by a temporary authorization under 30 TAC §305.62(k)(1)(A) followed by a major amendment or a modification in accordance with §305.70(k)(1). A temporary authorization for the use of synthetic tarps as ADC was issued in March 2011 followed by a modification approved by TCEQ in August 2012. ADC is used to cover waste that will be filled again within a 24-hour period. ADC is only used in areas that are surrounded by the containment berm. This practice allows collection of runoff generated by an area covered with ADC to be contained and handled as contaminated water.

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

- The daily cover will be sloped to drain;

- The daily cover will be spread and compacted with a minimum of two passes with the dozer tracks to minimize infiltration of stormwater, graded to drain, and will not have any waste visibly protruding through it;
- The Landfill Manager, or their designee, will document where daily cover has been placed and visually inspect during placement that a minimum of six inches of daily cover soil has been placed and that no waste is exposed. The Landfill Manager, or their designee, shall document, on a daily basis, the daily cover placement area and indicate the thickness has been visually verified and condition in the Cover Application Log (discussed further in Section 7.18.6);
- The Landfill Manager, or their designee, will inspect all daily cover areas for erosion, exposed waste, or other damage each day that the site is in operation. Repairs will be made as necessary. Erosion gullies or washed-out areas will be repaired within 24-hours after the area is accessible (i.e., after the cover soils and slopes dry out enough to allow access by earth-moving equipment without causing excessive rutting of cover soils); and
- The Landfill Manager, or their designee, will inspect for seeps from daily cover. All seepage water from waste below the daily cover will be controlled by placement of soil berms and diverted to a contaminated water collection area. Contaminated water will be treated as outlined in Part III, Attachment 3 – Leachate and Contaminated Water Plan.

Inactive areas with six inches of daily cover will be inspected each day the site is in operation for erosion, ponded water, seeps, protruding waste, or other detrimental conditions that may cause contaminated runoff from the daily cover. The Landfill Manager, or their designee, will place additional cover, as needed, to repair erosion, prevent ponded water and seeps, and cover protruding waste.

7.18.3 Intermediate Cover

All areas that receive waste and then become inactive for longer than 180 days will be covered with an additional six inches of well compacted cover material, for a total cover thickness of at least 12 inches. This 12-inch-thick layer of cover soil will be classified as "intermediate cover" and will be graded and maintained to prevent ponding. If the area becomes active again, the top six inches may be stripped off for use as daily cover in other areas. In addition, the top six inches of earthen material used for intermediate cover will be suitable for sustaining native plant growth and will be seeded or sodded following the placement of intermediate cover soils. Seeding will occur during a standard growing season when it is feasible to establish vegetation. The establishment of vegetation is desirable to reduce erosion, which helps to maintain the cover's integrity and improve the aesthetic appearance of the landfill, and aid in sediment control. Plant growth and other erosion control features will be maintained. Runoff from areas

that have intact intermediate cover is not considered as having come into contact with the working face or leachate.

The sequence of intermediate cover placement with respect to waste placement is included in detail in Part III, Attachment 1 – Site Drawing Package. The Landfill Manager or their designee will inspect intermediate cover at the site on a monthly basis. In addition, intermediate cover will be inspected at the City of Victoria Landfill within 72 hours of any rainfall event of 0.5 inches or more (i.e., 0.5 inches during a 24-hour storm). Erosion gullies or washed-out areas will be repaired within five days of detection by restoring the cover material, grading, compacting, and seeding, if necessary, unless the TCEQ Regional Office approves otherwise, based on the extent of the damage requiring more time to repair, or the repairs are delayed because of weather conditions.

In accordance with 30 TAC §330.165(e), the executive director may grant a temporary waiver for the requirements for daily, intermediate, and ADC if the owner or operator demonstrates that there are extreme seasonal climatic conditions that make meeting such requirements impractical.

7.18.4 Additional Cover Requirements for Class 1 Disposal Areas

In designated optional below-grade Class 1 disposal areas that have received Class 1 waste below grade (the flood protection levee elevation of 66.4 feet amsl), MSW and other waste types accepted at the facility will be placed above the Class 1 waste to meet above-grade final contours. In accordance with §330.457(b), the final below-grade Class 1 waste lift will be covered with a minimum of four feet of compacted clay-rich soil prior to waste placement above Class 1 wastes. Details are shown in Part III, Attachment 1 – Drawing C503. Consistent with §330.547(b), the final cover to be placed over the aerial fill in these areas will include a synthetic membrane that has a permeability less than or equal to the permeability of any bottom liner system overlain by a clay-rich soil cover layer consisting of a minimum of 18 inches of earthen material with a coefficient of permeability no greater than 1×10^{-5} cm/sec. Details are shown in Part III, Attachment 1 – Drawing C502.

7.18.5 Final Cover

Final cover placement will occur as areas of the site are filled to the design top-of-waste grades. Final cover placement over individual areas will be in accordance with Part III, Attachment 9 – Final Closure Plan and will permit ongoing landfilling operations to continue until the time of final closure. Surface water will be managed throughout the active life of the site to minimize infiltration into the filled areas and to minimize contact with solid waste. Erosion of final or intermediate cover will be repaired within five days after the initial inspection by restoring the cover material, grading, compacting, and seeding

unless the TCEQ Regional Office approves otherwise, based on the extent of the damage requiring more time to repair, or the repairs are delayed because of weather conditions. An eroded area is considered to be deep enough to jeopardize the final or intermediate cover if it exceeds four inches in depth as measured from the vertical plane from the erosion feature and the 90-degree intersection of this plane with the horizontal slope face or surface. The date of detection of erosion and date of completion of repairs, including reasons for any delays, must be documented in the Cover Application Log (refer to Section 7.18.6). Such periodic inspections and restorations are required during the entire operational life and for the post closure maintenance period. Refer to Section 7.23 of this SOP for a Site Inspection and Maintenance List.

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

- Survey controls will be implemented to control the filling of solid waste to the bottom level of the final cover system.
- A surveyed grid system on 100-foot centers will be established, or other suitable surveying or plans will be used to control placement of the final cover.
- When the appropriate design landfill height of the proposed final cover is reached, the top of the landfill will be regraded and reshaped as needed.
- During the first growing season following application of the final cover system, the site will be vegetated with appropriate grasses to minimize erosion.
- The surface water protection system will be constructed as indicated in Part III, Attachment 2 – Groundwater and Surface Water Protection and Drainage Plan.
- The final cover system layers will be constructed. Testing of the various components of the final cover system will be performed in accordance with Part III, Attachment 9 – Final Closure Plan.
- A final cover certification report complete with an as-built survey will be prepared by an independent licensed professional engineer and submitted to the TCEQ for approval.
- The TCEQ-approved final cover certification report will be maintained in the Site Operating Record and the final cover construction log (see Section 7.18.6) will be updated to reflect the area where final cover has been placed, the date final cover was constructed, and the thickness applied that date. The TCEQ Regional Office will also be notified that final cover placement has occurred at the site.

The final cover system, including the erosion control structures (drainage swales and chutes) will be maintained during and after construction. During the active life of the site, the Landfill Manager or their designee will inspect the final cover system on a weekly basis. In addition, during the active life of the

landfill, inspections of the final cover will occur within 72 hours of a rainfall event of 0.5 inches or more (i.e., 0.5 inches during a 24-hour period). Post Closure care inspection procedures are outlined in Part III, Attachment 11 – Post Closure Plan.

7.18.6 Cover Application Log

Throughout the landfill operation, a Cover Application Log will be maintained by the Landfill Manager, or their designee, and be readily available for inspection in accordance with §330.165(h). For intermediate cover and daily cover, the log will specify the date cover (no exposed waste) was accomplished, the area covered (by use of the grid system), how it was placed, when it was completed, and the last area covered. For final cover, the log will show the final cover area, specify the area covered, the date cover was applied, the thickness applied that date, and reference the final cover certification report for each area. The signature of the Landfill Manager, or other on-site supervisor, will certify each entry that the work was accomplished as stated in the log. Repairs will be documented in the log. The date of detection of erosion, or other repair issue, date of completion of repair (including reasons for any delays) will be included to document the report. In addition, both the volume of the earthen material required to be maintained within 1,000 feet of each working face and the volume of earthen material to cover the working face with at least one day application of six inches of daily cover will be recorded each day on the Cover Application Log.

7.19 Prevention of Ponded Water [30 TAC §330.167]

Site grading and maintenance will prevent the ponding of water over areas containing waste. Should ponding occur, the water will be removed as soon as practicable from areas not designated as stormwater collection areas in Part III, Attachment 1 – Drawings C006 and C007. Records of ponding preventive and corrective activities will be kept in the Site Operating Record. The depressions will be filled and regraded as quickly as possible, but no later than seven days from the end of the rainfall event (i.e., the end of the rainfall event is equivalent to the term “occurrence” as defined by 30 TAC §330.167). If the ponded water has come into contact with waste, leachate, or contaminated soils, it will be treated as contaminated water and handled in accordance with Part III, Attachment 3 – Leachate and Contaminated Water Plan. Contaminated water will be removed via a vacuum truck and transported to an off-site permitted treatment facility (refer to Section 3.0 of the-Part III, Attachment 3 – Leachate and Contaminated Water Plan).

The site will be inspected weekly to verify that no unauthorized ponded water areas exist. Ponded water in areas not over waste, such as in excavations, and detention ponds (this does not include approved lined areas; ponded water on approved liners is prohibited), is not prohibited so long as ponding in other areas

does not cause or contribute to nuisance conditions. Ponding in these areas will be monitored to prevent nuisance odors. In addition, excavations will be pumped out as necessary to maintain the area as accessible to earth-moving equipment. Detention ponds will be maintained to perform as designed. Water contained in basins or excavations may be used for dust control.

7.20 Disposal of Special Wastes [30 TAC §330.171]

Special wastes, as defined in 30 TAC §330.3, may be accepted at the facility in accordance with §330.171(b) and (c) and the TCEQ approved Waste Acceptance Plan (WAP) (refer to Appendix B– Special Waste Acceptance Plan). Special wastes other than those approved in the following paragraphs may be accepted if these wastes are addressed in the approved WAP. The approved WAP will be maintained in the Site Operating Record. As specified in 30 TAC §330.171(b)(2), requests for approval to accept certain types of special wastes (not specifically identified in 30 TAC §330.171(c) or (d) or in 30 TAC §330.173) shall be submitted to the TCEQ or to the facility with an approved plan and shall include the following:

- A complete description of the chemical and physical characteristics of each waste, a statement as to whether or not each waste is a Class 1 industrial waste as defined in 30 TAC §330.3, and the quantity and rate at which each waste is produced and/or the expected frequency of disposal.
- A hazardous waste determination as required by 30 TAC §335.6(c) for all Class I industrial waste.
- If special handling instructions are required, they will be provided as part of the pre-approval process; including, the proposed procedures for handling waste and listing required protective equipment for operating personnel and onsite emergency equipment.
- Procedures and responsibilities for containment and cleanup of any accidental spills occurring during the delivery and/or disposal operation will be conducted.
- When special wastes are to be disposed of at the City of Victoria Landfill, a complete transporter and generator profile will be required prior to acceptance of the special wastes. This profile includes:
    - A written declaration by the generator that the waste stream is non-hazardous waste.
    - A written declaration by the generator that the waste is not Class I Nonhazardous Industrial Solid Waste.
    - An estimate of the anticipated quantity, rate, and frequency of disposal for each special waste.

Approval by the TCEQ will not obligate the facility to accept the waste. The above-listed information will be maintained in the Site Operating Record.

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

- A special waste arrives without a waste manifest or required shipping document.
- An industrial or special waste arrives, and the waste material does not match the description on the waste manifest or other shipping document.
- An industrial or special waste arrives, and the waste differs from the approved waste based upon Quality Assurance/Quality Control (QA/QC) review or other monitoring.
- The volume of the waste is not consistent with the information on the shipping documents.

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

In addition, the special wastes identified in Sections 7.20.2 through 7.20.9 may be accepted at the facility without prior written authorization in accordance with 30 TAC §330.171(c). Approvals will be waste-specific and/or site-specific and will be granted only to appropriate facilities operating in compliance with Chapter 330. TCEQ may authorize the receipt of special waste with a written concurrence from the facility, however, the facility operator is not required to accept the waste. TCEQ may revoke an authorization to accept special waste if the owner or operator does not maintain compliance with the rules or conditions imposed in the authorization to accept special waste.

7.20.1 Petroleum Contaminated Soil

Soils contaminated by petroleum products, crude oils, or chemicals in concentrations of greater than 1,500 milligrams per kilogram (mg/kg) total petroleum hydrocarbons; or contaminated by constituents of concern that exceed the concentrations listed in Table 1, Constituents of Concern and their Maximum Leachable Concentrations in 30 TAC §335.521(a)(1) must be disposed in dedicated cells that meet the requirements of 30 TAC §330.331(e).

7.20.2 Medical Waste

Medical wastes from health care related facilities that have been treated in accordance with the procedures specified in 30 TAC Chapter 326 will be accepted in accordance with 30 TAC §330.171(c)(1). Medical waste that has not been treated will not be accepted unless authorized in writing by the TCEQ.

The TCEQ may provide authorization for untreated medical waste for unique situations in order to protect the human health and environment from the effects of a natural or man-made disaster.

7.20.3 Dead Animals or Slaughterhouse Wastes

The City of Victoria Landfill may receive dead animals or slaughterhouse wastes in accordance with 30 TAC §330.171(c)(2). Dead animals and slaughter-house wastes will be buried at the active face and covered with a minimum of three feet of other solid waste or a minimum of two feet of soil immediately upon receipt. Additional waste or soil will be added over the dead animals if objectionable odors are created by the dead animals or slaughterhouse wastes.

7.20.4 Regulated Asbestos-Containing Material (RACM)

RACM as defined in 40 CFR 61 may be accepted at the facility in accordance with 30 TAC §330.171(c)(3). The Landfill Manager will dedicate a specific area of the site for receipt of RACM and notify the TCEQ in writing of the designated area. RACM disposal locations will be identified by surveying and marked by a registered professional land surveyor on a current site drawing maintained at the site and submitted to the TCEQ upon completion. Each load of RACM that arrives on site will be documented. This documentation will include the volume of material, and the location and depth of its disposal. As the operation continues, the Landfill Manager will notify the TCEQ by the means stated above of any new dedicated areas for RACM. The RACM disposal area will not be larger than 50 feet by 50 feet.

Delivery of RACM will be coordinated by the Landfill Manager so that the waste will arrive during times that it can be properly managed by site personnel. A trained staff person will be present where the waste in being unloaded to direct and observe unloading.

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

RACM will be placed in landfill cells such that it will not be exposed as a result of erosion or weathering. At a minimum, the RACM will be placed below natural grade level. Where this is not possible or practical, RACM that is placed above natural grade must be located in the landfill unit such that it is, at closure of the landfill unit, at least 20 feet away from exterior final sideslopes and at least 10 feet below final grade. During unloading and placement of RACM in the waste fill, care will be exercised to prevent breaking open the bags or containers. One foot of soil cover or three feet of asbestos-free municipal solid waste will be placed over the RACM immediately after it is placed in the landfill. Care must be exercised in the application of the cover so that the bags or containers are not ruptured.

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

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

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

A waste discrepancy report or similar documentation will be completed when:

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

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

The Landfill Manager, or their designee, will contact the transporter and/or generator and notify them of the identification of any unauthorized waste. The transporter and/or generator will be required to take all necessary steps to determine the origin and to assure that in the future such wastes are either not collected or are taken to a facility approved to accept such waste. The appropriate state agency will also be contacted to provide the name and contact information of the transporter and to report measures taken to

resolve the arrival of unauthorized waste (e.g., returned to the transporter or disposed of by the City of Victoria Landfill at an approved facility). Multiple instances of unauthorized wastes found from the same transporter or generator may result in the City of Victoria Landfill refusing to accept waste from that transporter or generator.

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

Additionally, the TCEQ Monthly Waste Receipt Summary will be prepared by the Landfill Manager, or their designee, and submitted to the TCEQ no later than the 25th day of the month following the month that the waste was received. Reports will be on forms provided by the TCEQ and submitted to the Registration and Reporting Section. The facility will file reports including those months in which they receive no Class 1 RACM at the facility unless the TCEQ grants an exception. The reports will summarize the quantity, character, generator identity, and the method of storage, processing, and disposal of each Class 1 RACM shipment received and itemizes by manifest document number as required by the TCEQ.

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

In the event that bags or containers that contain RACM rupture, the procedures listed in Attachment 2 - Special Waste Acceptance Plan will be followed.

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

7.20.5 Nonregulated Asbestos-Containing Materials

Non-regulated asbestos-containing materials (non-RACM) may be accepted for disposal in accordance with 30 TAC §330.171(c)(4) provided the wastes are placed on the active working face and covered in

accordance with Section 7.18. Under no circumstances shall any material containing non-RACM be placed on any surface or roadway which is subject to vehicular traffic or disposed of by any other means by which the material could be crumbled into a friable state.

7.20.6 Empty Containers

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

- These containers may be disposed of at the landfill active face provided that:
  - the containers are triple rinsed prior to receipt at the site;
  - the containers are rendered unusable prior to or upon receipt at the site; and
  - the containers are covered by the end of the same working day they are received.
- Those containers for which triple-rinsing is not feasible or practical (e.g., paper bags, cardboard containers) may be disposed of by placing them at the working face and covering them with three feet of waste by the end of the day they were received.

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

In accordance with 30 TAC §330.171(c)(6), CESQG will be accepted at this facility provided the amount of waste does not exceed 220 pounds (100 kilograms) per month per generator and provided the Landfill Manager or their designee authorizes the acceptance of the waste.

7.20.8 Sludges

Sludges, grease trap waste, grit trap waste or liquid waste from municipal sources will be accepted if the material has been treated or processed (at a permitted off-site facility) and has passed the paint filter liquids test (Test Method 9095) and is certified to contain no free liquid, as prescribed in §330.17l(c)(7).

7.20.9 Used Oil Filters

Used oil filters from internal combustion engines must not be intentionally and knowingly accepted for disposal at the City of Victoria Landfill unless the filter has been (1) crushed to less than 20 percent of its original volume to remove all free-flowing used oil; or (2) processed by a method other crushing to remove all free-flowing used oil (as described in 30 TAC §330.171(d)(1)(B). Used oil filters (to include filters that have been crushed and/or processed to remove free-flowing used oil) will not be intentionally or knowingly accepted from any non-household generator for landfill disposal.

7.21 Disposal of Industrial Wastes [30 TAC §330.173, §330.179, §335.585 through §335.589]

7.21.1 Class 1 NIHW

Class 1 NIHW will be accepted for below-grade disposal at the facility in accordance with this section. Class 1 NIHW that is defined as Class 1 only because of its asbestos content will be accepted in accordance with Section 7.20.4. The operator may not accept Class 1 NIHW without written approval and a manifest per 30 TAC §335.10. Requests for authorization to accept Class 1 NIHWs must be submitted in writing to the TCEQ and include each of the following:

- A complete description of chemical and physical characteristics of the waste per 30 TAC §335.587, a hazardous waste statement, and the quantity, rate, and frequency of disposal.
- An operating plan containing the proposed procedures for handling the waste, a listing of required personnel protective equipment, and on-site emergency equipment. This plan will become part of the site operating plan.
- Written contingency plan meeting the requirements 30 TAC §335.589. This plan will become part of the site operating plan.

Consistent with 30 TAC §330.173(e), Class 1 NIHW will not be disposed of "in excess of 20 percent of the total amount of waste (not including Class 1 wastes) accepted during the current or previous year." The amount of waste may be determined by volume or by weight, but the same unit of measure must be used for each year, unless a variance is authorized by TCEQ.

In accordance with 30 TAC §330.173(f), any authorization to accept Class 1 NIHW is subject to the site operating in compliance with 30 TAC §330.173 and any specific conditions required under any letter(s) of authorization. Failure to operate the site in compliance with 30 TAC §330.173 or any special conditions imposed by the Executive Director may result in revocation of the authorization to accept Class 1 NIHW.

Shipments of Class 1 NHIW must be accompanied by a waste manifest document. The waste manifest is to be completed by the generator and transporter and shall accompany the driver of each waste load. The facility will then verify pre-authorization for disposal and complete the destination section of each manifest and return one copy of the completed manifest to the driver. One copy of the completed waste manifest will also be returned to the waste generator within 30 days after receipt of the waste. Manifests

are prepared in quadruplicate and the remaining copy will be filed in the Site Operating Record for a minimum of three years. Acceptable manifests will include at least the following information:

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

Additionally, the TCEQ Monthly Waste Receipt Summary will be prepared by the Landfill Manager, or their designee, and submitted to the TCEQ no later than the 25th day of the month following the month that the waste was received. Reports will be on forms provided by the TCEQ and submitted to the Registration and Reporting Section. The facility will file reports including those months in which they receive no Class 1 NHIW at the facility unless the TCEQ grants an exception. The reports will summarize the quantity, character, generator identity, and the method of storage, processing, and disposal of each Class 1 NHIW shipment received and itemizes by manifest document number as required by the TCEQ.

In accordance with 30 TAC §330.179, the requirements of 30 TAC §335.585 through §335.589 are described in the following subsections. Compliance with 30 TAC §335.590(24) related to design standards of the Class 1 facility are provided in Part III – Section 2.2.1, Section 4.3, Table 4-1, and Section 4.6.

7.21.1.1 General Inspection Requirements [30 TAC §335.585]

The Landfill will be inspected in accordance with Section 7.23, which includes a written schedule for inspecting monitoring equipment, safety and emergency equipment, and operating and structural equipment (such as dykes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards. Consistent with §335.585(b)(1), this inspection schedule will be maintained at the Landfill. In addition, the schedule specifies the types of problems to look for during Class 1 waste inspection. The inspection schedule includes the items and frequencies specified in 40 CFR §264.303 for hazardous waste landfills. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.

If any deterioration or malfunction of equipment or structures is revealed during the inspection, the facility must provide a remedy on a schedule that ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.

The operator will maintain inspection logs and retain these records in accordance with 30 TAC §335.113(2) (relating to Reporting of Emergency Situations by Emergency Coordinator). At a minimum, these records will include date/time of inspection, inspectors name, observations made, and date and nature of repairs, consistent with 30 TAC §335.585(d).

7.21.1.2 Personnel Training [30 TAC §335.586]

Landfill personnel will 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 in accordance with Section 3.2. This training shall be provided by a person trained in waste management procedures and must include instruction that teaches facility personnel waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

The training shall be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems. Procedures will be provided for using, inspecting, repairing, and replacing emergency and monitoring equipment, communications or alarm systems, response to fires or explosions, response to groundwater contamination, and shutdown of operations.

Personnel training must be completed within six months of employment and facility personnel must take part in an annual review of initial training. Personnel records required in 30 TAC §335.586(d) will be maintained in the site operating record, which include the job title of each position and employee name in that position, job description, description of type and amount of training for each position, records of training and job experience. 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.

7.21.1.3 Waste Analysis [30 TAC §335.587]

The Landfill personnel will follow the waste analysis requirements as specified in 30 TAC §335.587. Before treating, storing, or disposing of any waste, a chemical and physical analysis of the representative sample of the waste shall be obtained. At a minimum, the analysis must contain all the information that must be known to treat, store, or dispose of the waste. A waste generator's records of historic analyses performed or studies conducted on waste generated from processes similar to that which generated the waste to be managed may be included in the information. The generator of the waste will supply the information required upon request from the Landfill Manager. If the generator does not supply the

information, and Landfill Manager chooses to accept a waste, the Landfill Manager will be responsible for obtaining the information required.

The waste analysis must include data developed under Subchapter R of Chapter 335 (relating to Waste Classification), and existing published or documented data on a waste or on such waste generated from similar processes. The analysis must be repeated as necessary to ensure that it is accurate and up to date and at a minimum:

- When the owner or operator is notified, or has reason to believe, that the process or operation generating the waste has changed; and
- When the results of the inspection required below indicate that the waste received does not match the waste designated on the accompanying manifest or shipping paper.

Each waste received shall be inspected and, if necessary, analyzed to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.

7.21.1.4 General Requirements for Ignitable, Reactive, or Incompatible Wastes [30 TAC §335.588]

Precautions shall be taken to prevent accidental ignition or reaction of wastes that are ignitable or reactive as defined in 30 TAC §335.505 (relating to Class 1 waste determination). This waste must be separated and protected from sources of ignition and reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, smoking and open flame shall be confined to specially designated locations. “No Smoking” signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

Precautions will be taken to prevent reactions which:

- Generate extreme heat or pressure, fire or explosions, or violent reactions;
- Produce uncontrolled toxic mists, dusts, fumes, or gases in sufficient quantities to threaten human health or the environment;
- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion;
- Damage the structural integrity of the devices or facility; or
- Through other like means threaten human health or the environment.

The Landfill Manager will maintain documentation of compliance with this section when required. This documentation may be based on references to published scientific or engineering literature, data from trial tests (e.g., bench scale or pilot scale tests), waste analyses as specified in Section 7.21.1.3, or the results of the treatment of similar wastes by similar treatment processes and under similar operating conditions.

7.21.1.5 Contingency Plan [30 TAC §335.589]

This Class 1 waste contingency plan has been developed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of Class 1 waste or constituents of such waste to air, soil, or surface water. The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of waste or constituents of such waste that could threaten human health or the environment.

A copy of this Class 1 waste contingency plan and all revisions to the plan must be maintained at the facility and submitted to the local providers that may be called upon to provide emergency services (as identified subsequently in this plan).

This Class 1 waste contingency plan must be reviewed and updated, if necessary, whenever:

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

7.21.1.5.1 Emergency Contacts

The Landfill Manager or his designee will maintain a list of names, addresses, and phone numbers (office and home) of persons qualified to act as Emergency Coordinator (as discussed subsequently in this plan), and this list must be kept up-to-date and at the facility. Where more than one person is listed as the Emergency Coordinator, one must be named as primary Emergency Coordinator and others must be listed in the order in which they will assume responsibility as alternatives.

The facility is within the coverage area of the following emergency service providers:

- Victoria City Police Department;

- Victoria Fire Department;
- DeTar Hospital North; and
- Texas Department of Public Safety (Emergency Spill Response).

7.21.1.5.2 Emergency Equipment

Class 1 waste related emergencies at the facility could potentially involve spills or fires. Accordingly, the emergency equipment related to Class 1 waste and its location on-site is listed below.

Table 7-3: Emergency Equipment

Item	Location	Capabilities
Class A/B/C Fire Extinguishers	One per piece of heavy equipment involved in Class 1 waste operations (e.g., excavator, bulldozer)	Extinguish small combustion fires
Site Two-Way Telecommunication Radios or Cellular Phones	One per site personnel assigned to Class 1 waste operations, including Landfill Manager or his designee	Maintain contact among site personnel; inform personnel or emergency situations

This list of emergency equipment must be kept up to date.

7.21.1.5.3 Evacuation Plan

In the event the facility needs to be evacuated, the following actions will be taken:

- The Emergency Coordinator (discussed subsequently in this contingency plan) will designate emergency response team leaders, who will notify all personnel at the facility to evacuate the site immediately.

- The scale house located in the southeastern portion of the site near the main entrance/exit will be the primary evacuation rally point for facility personnel to gather during the evacuation. The evacuation routes to reach this rally point are via the main site haul roads and perimeter roads.

- Emergency response team leaders will take a head count of facility personnel once they arrive at the designated rally point. Each response team leader will report back to the Emergency Coordinator of whether their personnel are accounted for.

7.21.1.5.4 Emergency Coordinator

The Landfill Manager or his designee will serve as the primary Emergency Coordinator, so that there is an Emergency Coordinator either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. The Emergency Coordinator will be thoroughly familiar with this Class 1 Waste Contingency Plan, operations and activities at the facility, the location of records within the facility, and the facility layout. In addition, this person has the authority to commit the resources needed to carry out this Class 1 Waste Contingency Plan.

7.21.1.5.5 Emergency Procedures

Whenever there is an imminent or actual emergency such as a release, fire, or explosion that could threaten human health or the environment, the Emergency Coordinator will immediately:

- Notify appropriate facility personnel in person or by phone (two-way site telecommunications).
- Assess the situation by identifying the character, exact source, amount, and areal extent of any released materials. The Emergency Coordinator may do this by observation or review of facility records or manifests, and, if necessary, by chemical analysis. This assessment will consider possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any surface run-off from water or chemical agents used to control fire and heat-induced explosions).
- If help is needed, notify appropriate state or local agencies with designated response roles. If the Emergency Coordinator determines that the facility has had a release, fire, or explosion that could threaten human health or the environment outside the facility, the following applies:
  If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, the Emergency Coordinator will immediately notify appropriate local authorities, and must be available to help appropriate officials decide whether local areas should be evacuated. This includes an immediate notification of the National Response Center (using their 24-hour toll free number 1-800-424-8802). The report must include:
  - name and telephone number of person making report;
  - name and address of facility;
  - time and type of incident (e.g., release, fire);
  - name and quantity of material(s) involved, to the extent known;

  - the extent of injuries, if any; and
  - the possible hazards to human health, or the environment, outside the facility.

- During an emergency, the Emergency Coordinator will take reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other waste at the facility. These measures must include, where applicable, stopping operations, collecting and containing released waste, and removing or isolating containers. Further details are presented in the bullets that follow.
- Should any accidental spill of Class 1 wastes occur at the facility, it will be immediately contained by earthen dikes, berms or by other appropriate measures. The Landfill Manager or his designee will be promptly notified of the spill and will coordinate the collection and disposal of the spilled material. The spilled wastes will be picked up mechanically or by employees wearing proper protective equipment and managed according to procedures for handling the special waste.
- For larger spills, or where there is potential for the waste to impact waters of the state, the Emergency Coordinator will assess the situation and determine the appropriate means to contain and collect the material. If spilled material threatens to impact storm water discharge from the site, the Landfill 'Manager or his designee will use booms or diversionary dikes, or excavate holes or pits as needed to contain the spilled material. Equipment typically available for spill response includes excavators, backhoes, dozers, pumps, and haul trucks. In the event of a spill that cannot be picked up using hand-held tools, this equipment will be used as needed to contain and collect spilled material. For larger spills of liquid wastes that cannot be adequately cleaned up with on-site equipment, a qualified emergency cleanup contractor or vacuum truck company will be contacted to assist with cleaning up the spill. Once the liquids are removed, a visual inspection of the spill area will be made, and soils observed to be potentially impacted will be over-excavated and disposed with the collected material as described below.
- Should an incident occur where hazardous wastes, radioactive waste, or other prohibited wastes are suspected or discovered, the waste will not be authorized for disposal but instead will be isolated until the material can be adequately identified to determine the proper disposition/remediation of the material and the appropriate handling procedures. During this identification process, the generator's representative will be contacted to determine the identity of the material, and the planned disposition/ remediation of the material. The proper disposition/remediation of the prohibited waste will be specific to the waste and will be implemented.
- Immediately after an emergency incident, the Emergency Coordinator will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material

that results from a release, fire, or explosion at the facility. The owner or operator will classify all recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility in accordance with TCEQ rules.

- The Emergency Coordinator will ensure that in the affected area(s) of the facility:
  - no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
  - emergency equipment listed in this Contingency Plan is cleaned and fit for its intended use before operations are resumed

7.21.2 Class 2 and Class 3 Industrial Waste

Class 2 and Class 3 industrial solid wastes will be accepted at the facility provided the acceptance does not interfere with facility operation. Industrial waste (nonhazardous) is defined by 30 TAC §330.3 as solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations, classified as follows:

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

7.22 Visual Screening of Daily Operations [30 TAC §330.175]

TCEQ may require visual screening of disposal operations at the Landfill. Existing vegetation in the buffer zones will be maintained, where possible, to provide visual screening of disposal operations from public view. A landscaped area will be provided at or near the entrance to the site and other areas as determined by the Landfill Manager. The facility will be operated in a manner that will provide the maximum screening possible within the requirements of the design. Upon completion of filling,

additional landscape berms and foliage will be installed. Final landscaping, consisting of grass seeding on the fill final cover, will be performed upon the completion of each sector.

7.23 Site Inspection and Maintenance List

Table 7-4: Site Inspection and Maintenance Requirements

Item	Task	Frequency	Inspector	Inspection Documentation
Fence/Gates	Inspect perimeter fence and gates for damage. Make repairs if necessary.	Weekly	Landfill Manager or Designee	Document inspection in the Site Operating Record. Notification to Regional Office of a breach (if any).
Wind Blown Waste	Police working fence area, wind fences, access roads, entrance area, and perimeter fence for loose trash. Clean up as necessary	Daily as specified in Section 7.5.	Landfill Manager or Designee	Document inspection in the Site Operating Record
Waste Spilled on Route to Site	Police the entrance areas and all roads at least two miles from the site entrances for loose trash. Clean up as necessary.	Daily as specified in Section 7.8.	Landfill Manager or Designee	Document inspection in the Site Operating Record
Landfill Markers	Inspect all landfill markers for damage, color-coding, and general location. Correct or replace damaged markers within 15 days of discovery.	Monthly	Landfill Manager or Designee	Document inspection in the Site Operating Record
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. Grading equipment will be used at least once per week to control or remove mud accumulations on roads as well as minimize depressions, ruts, and potholes.	Daily or more often during wet weather or extended dry weather periods.	Landfill Manager or Designee	Document inspection and repairs in the Site Operating Record
Daily Cover	Inspect for proper placement, thickness, and compaction. Correct problems as needed. Verify that vectors are not an issue	Daily at the active face. All daily cover areas will be inspected within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document inspection in the Site Operating Record

Item	Task	Frequency	Inspector	Inspection Documentation
Intermediate Cover	Inspect for proper placement, thickness, erosion, compaction and for presence of waste or other contamination. Correct problems as needed.	Weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document inspection in the Site Operating Record
Final Cover	Inspect for proper placement, thickness, compaction, slope, settlement, and erosion. Maintenance will be ongoing throughout post-closure care period. Correct problems as needed.	Weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document inspection in the Site Operating Record
Leachate	Measure depth of leachate in sump, as required.	Weekly	Landfill Manager or Designee	Document inspection in the Site Operating Record
Site Signs	Inspect all site signs for damage, general location, and accuracy of posted information.	Weekly	Landfill Manager or Designee	Document inspection in the Site Operating Record
Ponded Water	Inspect site for unauthorized ponded water areas as described in Section 7.19. Correct problems as needed.	Weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document inspection in the Site Operating Record
Odor	Inspect the perimeter of the site to access the performance of site operations to control odor.	Daily	Landfill Manager or Designee	Document in the Site Operating Record.
Perimeter Channels	Inspect perimeter channels to verify that they are functioning as designed (e.g., excess sediment removed, outlet structures intact, erosion control measures intact)	Weekly and within 72-hours of a rainfall event of 0.5 inches or more.	Landfill Manager or Designee	Document in the Site Operating Record.
GCCS	Verify GCCS is operating and maintained in accordance with all applicable requirements.	Monthly	Environmental Manager or Designee	Document in the Site Operating Record

8.0 SEQUENCE OF DEVELOPMENT

The sequence of development of the City of Victoria Landfill is provided in Part III, Attachment 1 – Drawing C002 (Landfill Cell Expansion Plan). The Site will be constructed and filled starting in the northern portion of the site and moving to the southern part of the site. The order of development for the southern portion of the site is shown in Part III, Attachment 1 – Drawing C003 (Waste Placement Phasing Plan). The area method of excavation will be used for the remainder of the site where practical.

9.0 SAFETY

9.1 General Site Safety

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

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

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

A record of training will be maintained to confirm that each employee has received the proper training (refer to Section 3.2 for additional information).

Well-maintained equipment is vital to the safe conduct of daily landfilling operations. Therefore, all site equipment will be maintained in proper working order and all safety guards, backup alarms, and engine kill switches will be operational. Equipment Operators will perform an equipment check at the beginning of each workday. Fire extinguishers will be inspected routinely (refer to Section 6.0 for additional information).

Access to the site will be limited to authorized personnel as described in Section 7.1 of this SOP. Access is controlled by a combination of signs and physical barriers. Site personnel are responsible to be alert for the entrance of unauthorized personnel or the entrance of authorized personnel into prohibited areas.

In the event of an emergency, site personnel will assess the situation, notify the Landfill Manager or designee, and take appropriate actions such as rendering aid, calling for assistance, or closing access to the emergency scene. Emergency numbers will be posted, which include:

- Ambulance 911

- Fire 911
- Sheriff/Police 911

9.2 Preparedness and Prevention Measures

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

9.2.1 General

General preparedness and prevention measures that will be followed at the City of Victoria Landfill are:

- Access controls will provide for the safety of non-landfill personnel.
- Routine preventive maintenance of equipment will be provided.
- A management representative will perform site inspections as noted in Section 7.23.
- Appropriate personnel safety equipment will be kept onsite and maintained in good repair.
- Adequate turning area for hauling vehicles will be provided.
- Salvaging and scavenging will not be allowed.
- Waste unloading will be restricted to designated areas only.
- Site personnel will be alert for possible hazardous or other unauthorized wastes.
- Nonapproved wastes will be controlled or contained and removed, as necessary.

9.2.2 Scale House

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

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

9.2.3 Landfill Haul Road and Access Road

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

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

APPENDIX A – EXAMPLE LOAD INSPECTION REPORT FORM

CITY OF VICTORIA LANDFILL
VICTORIA COUNTY, TEXAS
TCEQ PERMIT NO. MSW-1522A

SITE OPERATING PLAN
APPENDIX A
EXAMPLE LOAD INSPECTION REPORT

(For information purposes only, actual form may vary)

Prepared for

City of Victoria

April 2006

Prepared by

Weaver Boos Consultants, LLC–Southwest
6420 Southwest Blvd., Suite 206
Fort Worth, Texas 76109
817-735-9770

WBC Project No. 0120-74-11-06-01

LOAD INSPECTION REPORT

LOAD INSPECTION DESCRIPTION

Date of Inspection:		Time of Inspection:		Ticket Number:	
Name of Inspector:					
Name of Hauling Company:					
Driver's Name:					
Vehicle Identification:		Load Size:			

SOURCE IDENTIFICATION

LOW RISK SOURCES	MEDIUM RISK SOURCES	HIGH RISK SOURCES
___ Residential	___ Dry Cleaners	___ Large Manufacturing
___ Office Buildings	___ Auto Body Repair	___ Doctor's Office
___ Schools	___ Small Manufacturing	___ Hospital
___ Farms	___ Nursing Homes	___ Paint Manufacturers
___ Apartments	___ Other	___ Print Shops
___ Restaurants		___ Waste Brokers
___ Department Stores		___ POTW's
___ Other		___ Other

LOAD CONTENTS

Household Wastes	Yes ☐	No ☐		Transformers/Capacitors	Yes ☐	No ☐	
Wood, Sawdust	Yes ☐	No ☐		Labeled Hazardous Waste	Yes ☐	No ☐	
Metal	Yes ☐	No ☐		Batteries	Yes ☐	No ☐	
Paper, Cardboard	Yes ☐	No ☐		Oil	Yes ☐	No ☐	
Yard Waste, Brush, Stumps	Yes ☐	No ☐		Medical	Yes ☐	No ☐	
Containers > 5 gallons	Yes ☐	No ☐		Radioactive	Yes ☐	No ☐	
Bulk Liquids	Yes ☐	No ☐		Soil	Yes ☐	No ☐	
Powders, Dusts	Yes ☐	No ☐		Asphalt, Concrete, Rock	Yes ☐	No ☐	
Roofing Material	Yes ☐	No ☐		Food Waste	Yes ☐	No ☐	
Tires	Yes ☐	No ☐		Other	Yes ☐	No ☐	
Does Waste Match the Waste Hauler's Description?					Yes ☐	No ☐	
Unusual Odors?	Yes ☐	No ☐		Unusual Colors?	Yes ☐	No ☐	
Heat, Excessive Smoke?	Yes ☐	No ☐					

ACTION TAKEN

Signature of Inspector:	Signature of Driver:

APPENDIX B – SPECIAL WASTE ACCEPTANCE PLAN

Part IV-Appendix B Special Waste Acceptance Plan

City of Victoria

City of Victoria Landfill Lateral and Vertical Expansion
Project No. 107608

Revision 0, March 28, 2022

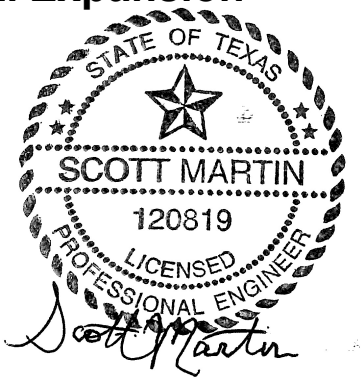
Part IV-Appendix B
Special Waste
Acceptance Plan

prepared for

City of Victoria
City of Victoria Landfill Lateral and Vertical Expansion
Victoria County, Texas

Project No. 107608

Revision 0, March 28, 2022



prepared by

Apr 5 2022 11:22 AM

Burns & McDonnell Engineering Company, Inc.
Austin, Texas

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STATE OF TEXAS
SCOTT MARTIN
120819
LICENSED
PROFESSIONAL ENGINEER
Scott Martin
Apr 5 2022 11:23 AM

LIST OF ABBREVIATIONS

Abbreviation	Term/Phrase/Name
Burns & McDonnell	Burns & McDonnell Engineering Company, Inc.
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
EPA	Environmental Protection Agencies
mg/kg	milligrams per kilogram
mg/L	milligrams per Liter
MSW	municipal solid waste
NRG	National Response Center
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyls
QA/QC	Quality Assurance / Quality Control
RACM	Regulated Asbestos Containing Materials
RRCT	Railroad Commission of Texas
SDS	Safety Data Sheets
SWAA	Special Waste Acceptance Authorization
TAC	Texas Administrative Code
TCEQ	Texas Commission on Environmental Quality
TSCA	Toxic Substances Control Act
U.S.	United States

1.0 PURPOSE AND SCOPE

The Texas Commission on Environmental Quality (TCEQ) municipal solid waste (MSW) regulations currently define a special waste as a "solid waste or combination of solid wastes that because of its quantity, concentration, physical or chemical characteristics, or biological properties requires special handling and disposal to protect the human health or the environment." Although the regulations define specific wastes as "special waste," the rules also include a catch-all definition that encompasses as special waste "any waste stream other than household or commercial garbage, refuse or rubbish." With this broad definition of special waste, numerous wastes that are routinely managed at MSW landfills (Landfills) may be included within this definition.

The receipt those special wastes identified in 30 TAC §330.171(c)-(d) do not specifically require written approvals for acceptance if handled in accordance with the waste management provisions noted in those regulations. The acceptance and/or disposal of all special wastes not identified in 30 Texas Administrative Code (TAC) §330.171(c)-(d) require prior written approval from the executive director. Requests for approval to accept special wastes shall be submitted by the generator to the Executive Director or to a facility with an approved plan. All requests shall include an operational plan containing the proposed procedures for handling each waste and listing required protective equipment for operating personnel and on-site emergency equipment. Requests shall also include a Contingency Plan outlining responsibility for containment and clean-up of any accidental spills occurring during the delivery or disposal of the waste. Special wastes requiring written approval from the Executive Director will not be accepted unless the generator first provides the written acceptance to the City.

According to 30 TAC 330.171(b)(l), approvals will be waste specific and/or site specific. This plan has been developed in order to receive site-specific authorization to accept special waste including non-industrial special wastes and Class 1, 2 or Class 3 industrial wastes.

Soils contaminated by petroleum products, crude oils, or chemicals in concentrations of greater than 1,500 milligram per kilogram (mg/kg) total petroleum hydrocarbons; or contaminated by constituents of concern that exceed the concentrations listed in Table 1, Constituents of Concern and Their Maximum Leachable Concentrations in 30 TAC §335.521(a)(1) must be disposed in dedicated cells that meet the requirements of 30 TAC §330.331(e).

The executive director may authorize the receipt of special waste with a written concurrence from the facility, however, the facility operator is not required to accept the waste. The executive director may revoke an authorization to accept special waste if the owner or operator does not maintain compliance

with conditions imposed in the authorization to accept special waste. Special waste listed under 30 TAC §330.171(c) may be accepted if managed per the handling procedures for each waste identified in 30 TAC §330.171(c)(1) - (7). Used oil filters from internal combustion engines must not be intentionally and knowingly accepted for disposal at landfills permitted under this chapter except as provided in 30 TAC §330.171(d)(1) & (2).

Any authorization to accept Class 1 waste is subject to the site operating in compliance with 30 TAC 330.173 and any specific conditions required under any letter(s) of authorization. Failure to operate the site in compliance with 30 TAC §330.173 or any special conditions imposed by the executive director may result in revocation of the authorization to accept a Class 1 waste.

Class 2 and Class 3 industrial wastes may be accepted at the facility provided the acceptance of this waste does not interfere with facility operation.

The purpose of this plan is to outline specific operational and technical procedures and guidelines to be utilized at the facility for the acceptance and management of special wastes. All special wastes handled, treated, and/or disposed of at this facility will be subject to these procedures and guidelines.

To further clarify the definition of special waste and for the specific purposes of this plan, special waste shall be defined as:

- Materials from oil, gas and geothermal activities subject to regulation by the Railroad Commission of Texas (RRCT) when these materials are to be processed, treated or disposed of at the facility.
- Dead animals, other than single household pets and other single small animals, and slaughterhouse wastes.
- Soil and sorbent material contaminated by petroleum substances as defined in 30 TAC §335.1 (relating to Definition of Petroleum Substance) or chemicals listed in 30 TAC §335.521(a) (relating to Constituents of Concern and Their Maximum Leachable Concentrations).
- Certain items of medical waste from health-care-related facilities, as defined in 30 TAC §326.75(r)(1)-(5).
- Discarded materials containing asbestos.

- Non-hazardous empty containers with a holding capacity greater than 5 gallons which have held either pesticides (e.g., insecticides, herbicides, fungicides or rodenticides) or hazardous chemicals/constituents as defined in Title 40 Code of Federal Regulations (CFR) Part 261, Appendix VIII, or listed in 40 CFR 261.33(e) or (f).

- Hazardous waste from conditionally exempt small quantity generators meeting the requirements of 30 TAC §335.78.

- Non-hazardous drugs (not including manufacturing wastes), contaminated foods, and contaminated beverages, other than those contained in normal household waste.

- Bulk or containerized liquids, other than those contained in normal household waste.

- Municipal wastewater treatment plant sludges, other types of domestic sewage treatment plant sludges, water-supply treatment plant sludges, and septic tank pumpings (i.e., those materials regulated under 30 TAC §312 (relating to Sludge Use, Disposal and Transportation)) and those sludges other than those regulated under 30 TAC §312.

- Grease and grit trap wastes.

- Light ballasts or small capacitors containing polychlorinated biphenyls (PCB) compounds as defined in 40 CFR 761.3 (relating to Federal PCB/Toxic Substances Control Act (TSCA) regulations).

- Incinerator ash.

- Filter media (e.g., paint filters, glycol filters, molecular sieves, and other types of filter media), but not including those contained in normal household waste or used oil filters from internal combustion engines.

- Abrasive wastes (e.g., blasting grit, steel shot, etc.).

- Demolition debris contaminated with lead from structures, which have received one or more coats of lead-based paint.

- Class l, 2 and Class 3 industrial solid wastes as identified in 30 TAC §330.3.

- Any other non-hazardous solid waste or combination of solid wastes that because of its quantity, concentration, physical or chemical characteristics, or biological properties requires special handling (e.g., treatment, immediate burial, worker protection, solidification, bio-remediation, engineered controls, or any other preparation to receive the waste) prior to disposal to protect human health and/or the environment. If improperly handled, transported, stored, processed, disposed of or otherwise managed, such waste may pose a present or potential danger to human health or the environment.

- Waste generated outside the boundaries of Texas that meets the definition of the above-referenced special wastes, MSW, construction & demolition waste, brush, yard waste, etc.

The City of Victoria Landfill is authorized to accept MSW, special waste, and non-hazardous industrial waste. This Special Waste Acceptance Plan identifies the types of special waste the facility is authorized to accept and the procedures for evaluating waste for acceptance. This plan addresses the requirements of 30 TAC §330.171 and 30 TAC §330.173. Classification of industrial and hazardous waste will be in accordance with 30 TAC §335.501-515 and §335.521 (Subchapter R: Waste Classification).

2.0 HAZARDOUS WASTE DETERMINATION

A hazardous waste determination as required by 30 TAC §335.6(c) pursuant to 30 TAC §335.504 (relating to Hazardous Waste Determination) will be performed for all Class 1 Industrial Wastes in accordance with 30 TAC §330.171(b)(2)(B).

Records of the hazardous waste determination shall become a part of the landfill operating record as identified in 30 TAC §330.125(b) (relating to Recordkeeping Requirements).

3.0 WASTE EVALUATION CRITERIA

Special wastes will be evaluated prior to acceptance in accordance with 30 TAC §330.171 and 30 TAC §335.504 and assures the waste is acceptable pursuant to permit conditions, applicable regulations, and operating capabilities.

Prior to the acceptance of a special waste, the generator/customer is required to state and certify the chemical and physical characteristics, origin, and estimated quantity of the special waste proposed for disposal. In addition, if the waste is not readily identifiable, the generator/customer may be required to provide other pertinent information regarding the waste that might aid in its identification. The following process must be completed before a special waste (other than dead animals and, in some cases, empty containers) is accepted.

- The potential generator/customer completes and signs the Non-Hazardous Waste Profile known as a Special Waste Acceptance Authorization (SWAA, example in Attachment 1) and may be required to provide laboratory analysis data for the waste stream intended for disposal. Texas generators and out-of-state generators will be required to submit evidence that the special waste has been classified as a Class 1, 2 or 3 waste either by the TCEQ or self-classified as a Class 1, Class 2 or 3 waste according to the TCEQ regulations if the waste is an industrial waste. Verification of a Texas industrial generator's TCEQ Notice of Registration will also be performed. If the special waste is not an industrial waste (i.e., municipal generators), Texas generators and out-of-state generators will be required to submit evidence that the non-industrial special waste is non-hazardous.

- The SWAA and all information provided by the potential generator/customer will be reviewed by The City of Victoria Special Waste Coordinator. This Coordinator is someone who has been given internal approval by the City of Victoria to implement the Special Waste Program including the review and approval for the acceptance of special waste based on his/her training and qualifications.

- The Special Waste Coordinator ensures that any analytical information submitted, meets the requirements as described in Section 4.0 of this plan, assigns any necessary conditions/limitations on managing the waste, and makes the decision if the waste is eligible for disposal at the facility. Once the Special Waste Coordinator determines the waste is eligible, all information is routed to the District Manager or designated representative for review and final approval.

- The District Manager or designated representative reviews all information provided, may assign any additional conditions/limitations on managing the waste, and makes the final decision if the waste is acceptable at the facility in conformance with all applicable regulations, permit conditions and operating capabilities.

- Any necessary special conditions/limitations will be indicated on the SWAA. The generator/customer must agree to comply with all conditions/limitations stated by the Coordinator, District Manager or designated representative and contained in the SWAA.

4.0 QUALITY ASSURANCE / QUALITY CONTROL

The laboratory analyses required for review with the SWAA is dependent upon the type of waste stream to be disposed. Analyses must have been conducted in accordance with EPA test procedures as outlined in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" (EPA Publication No. SW-846). "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, American Society for Testing and Materials (ASTM) Standard Methods, or another approved EPA method. These analytical methods shall be performed on a representative sample(s) of the waste as described in Chapter 9 of "Test Methods for Evaluation of Solid Wastes, Physical/Chemical Methods" (EPA Publication No. SW-846), as amended, or Chapter 4 of EPA's "Ecological Assessment of Hazardous Waste Sites; a Field and Laboratory Reference" (NTIS PB 89-205967) or as amended. Landfill personnel must obtain proper analytical results or equivalent information (i.e., 40 CFR 262.11 allows generator's knowledge of the waste and process generating the waste) to ensure that the facility is not managing hazardous waste or other prohibited wastes.

Information about a waste as well as the process generating that waste may be used to evaluate or assist in the evaluation of a special waste. Examples of such information include, but are not limited to, Safety Data Sheets (SDS), manufacturers literature, analytical results (e.g., a total metals analysis may demonstrate that the potential metals of concern are not present in the waste and therefore could not leach above the levels of concern), knowledge of how the waste was generated (e.g., a filter was used in painting operations and therefore does not contain any pesticides), and other such information generated in conjunction with a particular waste generation activity or process.

- When using "process knowledge" to address one or more special waste evaluation criteria, the following shall be documented;
    - A full description of the waste, including a description of the components that make up the waste as well as their sources.
- In addition to the above, all information that is used to evaluate special wastes shall be documented.

Analytical reports and/or sampling documentation must clearly identify the generator and/or customer, description of the material sampled, and analyzed and when analyses were conducted. ·

The reference of methods employed must accompany the analytical data and be EPA/TCEQ approved method(s), as applicable. Laboratory QA/QC information must accompany the data submitted and may include: sample handling, containerization and preservation techniques, chain of custody records, data on standards, duplicate analyses, spikes and blanks, and other pertinent statistical information.

Special waste that is delivered to the landfill for disposal will receive a visual QA/QC inspection to verify contents and nature of waste. The gate attendant will monitor each load entering by observing the vehicle, and/or inspecting the load, and/or questioning the driver concerning the origin of the waste. The waste file will be reviewed for quality assurance/quality control and for instructed management procedures (cover requirements, etc.) If a particular load cannot be determined as acceptable by the gate attendant or if there are questions concerning the origin and makeup of the waste, landfill management will be called upon to enact additional QA/QC procedures. Additional QA/QC may be performed including random load inspections, pH testing, reactivity testing, and ignitability testing. The purpose of these procedures will be to either accept or reject the questionable load, or to verify that the waste is as described on the manifest and that the waste coming into the landfill is the same waste which was approved.

Any waste containing free liquids as determined using the paint filter liquids test (see EPA Method 9095 in “Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods,” EPA Publication No. SW-846) may be tested for suitability of any solidification/stabilization processes utilized at the landfill prior to the acceptance of the waste. If acceptable, the waste will be solidified/stabilized to pass the paint filter test prior to disposal.

In the event the physical characteristics of a waste being received at the landfill differs from that of the approved waste stream, disposal will cease, and the generator/customer will be required to provide additional process and/or chemical analyses data in order to determine the cause of the change in waste characteristics and any associated disposal requirements.

The City of Victoria requires the generator/customer to provide notification and additional process and/or chemical analysis data in the event there are changes in the process from which the waste is produced. At a minimum, all special waste streams approved and accepted for disposal will be reevaluated prior to the expiration date on the SWAA.

5.0 DOCUMENTATION AND RECORDKEEPING

All required paperwork and documentation relating to the acceptance of special wastes will be maintained on-site by hard copy or digital copy and available for review. The following forms and/or documentation will be required under this acceptance plan:

5.1 TCEQ Waste Classification

Industrial generators will be required to submit evidence that the waste has been classified as a Class 1, Class 2 or Class 3 waste by the TCEQ or self-classified as a Class 1, Class 2 or Class 3 waste according to TCEQ regulations. For Texas industrial generators, generators will be required to submit their registration number. For out of state generators, documentation must be provided to ensure the waste has been assigned a Class 1 waste, Class 2 or Class 3 classification after approval by the TCEQ pursuant to 30 TAC §335.508(9)(ii).

5.2 Landfill Special Waste Acceptance Authorization

The SWAA are required of generators/customers of special waste. The generator/customer certifies by signature that all information contained in the SWAA is true and correct. As a result of potential future internal City of Victoria revisions, the format and/or information contained on the SWAA may change. Copies of the current SWAA will be maintained in the operating record.

5.3 Special Waste Manifest

Special Waste Manifests will accompany each shipment of the approved waste stream. The manifest will include the name of the generator/customer, transporter, and number of the approved SWAA number.

5.4 Analytical and/or Process Knowledge Documentation

All analytical reports and/or sampling documentation as well as any documentation related to process knowledge evaluations will be maintained on site by either hard copy or digital copy.

5.5 Shipping Manifest

Each shipment of Class 1waste must be accompanied by a TCEQ properly completed waste uniform manifest. In the event, the TCEQ manifest requirements are changed, City of Victoria Landfill will make the appropriate changes in the attached forms. Copies of manifests will be retained for three years.

5.6 Report of Class 1 Waste Received

A monthly written report of Class 1 waste received will be submitted to the Executive Director by the 25th of each month. Reports will be submitted on forms provided by the TCEQ and shall include all

information required. Monthly reports will be filed for those months in which no Class 1 waste is received at the facility, unless an exception is granted by the executive director.

6.0 WASTE DISCREPANCIES AND REJECTED LOADS

Documentation for all profiled wastes that arrive for management is reviewed at the facility. If the waste and associated documentation is missing, incomplete, or the characteristics of the waste are questionable, all discrepancies must be resolved prior to acceptance of the waste. In the event the discrepancies cannot be resolved, the waste load will be rejected. All waste discrepancies must be resolved before a waste can be accepted for disposal. Discrepancies which may cause a load to be rejected include but are not limited to:

- A special waste requiring a manifest arrives without a TCEQ manifest.
- A special waste arrives and the waste material does not match the description on the waste manifest.
- A special waste arrives and the information on the manifest is not complete or is incorrect.
- A special waste arrives which does not match the information provided on the SWAA.
- The approved SWAA has expired.

In the event that the description or physical characteristics of a waste being received at the landfill differs from that of an approved waste stream or if previously unidentified waste is suspected, the load will be stopped, and the generator/customer will be required to provide additional process and/or chemical analysis data in order to determine the proper identity of the waste.

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

7.0 TRAINING OF PERSONNEL AND WASTE SCREENING

Appropriate facility personnel will receive proper instruction on special waste identification and screening procedures as well as the containment and cleanup of accidental spills. Seabreeze provides in-house company-designed education to key facility operations personnel and appropriate gatehouse and field personnel. Documentation and a record of all training provided to personnel will be maintained onsite. This required training allows for the monitoring of waste streams prior to disposal as they enter the facility as well as during disposal under the supervision of properly trained personnel.

8.0 SPECIAL WASTE HANDLING PROCEDURES

The following special wastes will be handled and disposed of in accordance with the provisions applicable to that waste.

- Non-hazardous soil and sorbent material contaminated by petroleum substances as defined in 30 TAC §335.1 (relating to Definition of Petroleum Substance) or chemicals listed in 30 TAC 335.521(a) (relating to Constituents of Concern and Their Maximum Leachable Concentrations) maybe disposed of at the landfill.

- Non-hazardous special wastes from health care related facilities, which have been treated in accordance with the procedures specified in 25 TAC 1.136 (relating to Approved Methods of Treatment and Disposition), will be accepted at the landfill facility. When a situation exists which requires disposal of untreated waste in order to protect human health or the environment from the effects of a natural or manmade disaster, a request for written authorization from the executive director will be submitted to the TCEQ, in accordance with 30 TAC §330.171, carcasses and body parts of animals designated as a special waste from health care related facilities which have been treated in accordance with the provisions of 25 TAC §1.136(a) (relating to Approved Methods of Treatment and Disposition) may, after treatment, be disposed at the landfill facility in accordance with the provisions of 30 TAC §330.136(b)(2), which provides: Dead animals and/or slaughterhouse waste maybe accepted at any landfill facility without further approval from the executive director provided the carcasses and/or slaughterhouse waste are covered by three feet of other solid waste or at least two feet of soil immediately upon receipt. In accordance with 30 TAC §330.171, recognizable human body parts, tissues, fetuses, organs, and the products of human abortions, spontaneous or induced, shall not be disposed of in the landfill. Hypodermic needles, syringes with attached needles, scalpel blades, and/or razors may be accepted for disposal. The generator is responsible for placing these wastes in containers designed for sharps. If the container's contents have not been encapsulated, then the generator must ensure that the container shall be segregated from the regular municipal solid waste collection system and shall be collected and transported without compaction to the landfill for disposal.

- Non-hazardous drugs (not including manufacturing wastes), non-hazardous contaminated foods, and non-hazardous contaminated beverages will be disposed of at the landfill and a minimum of one foot of other municipal solid waste or six inches of dirt will be placed on the waste immediately upon disposal (in addition to daily cover placed on the working face) and additional

precautionary measures are taken to prevent scavenging and salvaging. For waste that may contain free liquids, the provisions outlined in the paragraph below must also be followed. Non-regulated and non- illegal drugs received in volumes of less than 1 cubic foot need not be covered immediately upon receipt as long as scavenging and salvaging does not occur. Coordination with the United States (U.S.) Drug Enforcement Agency is required for the disposal of controlled substances.

- Non-hazardous light ballasts and non-hazardous small capacitors containing PCB compounds as defined in 40 CFR 761.3 (relating to Federal PCB/TSCA regulations) will be disposed of at the landfill if the wastes are not originating from either a PCB capacitor manufacturing process or a PCB equipment manufacturing process.

- Non-hazardous incinerator ash may be disposed of in the landfill under this plan provided the ash is handled such that it does not cause operational problems or become a public health nuisance.

- Non-hazardous filter media (e.g., paint filters, glycol filters, molecular sieves and other types of filter media), but not including those contained in normal household waste or used oil filters from internal combustion engines, will be disposed of in a landfill under this plan provided the waste is handled such that it does not cause operational problems or become a public health nuisance.

- Non-hazardous abrasive wastes (e.g., blasting grit, steel shot, etc.) may be accepted at the landfill under this plan provided the waste is handled such that it does not cause operational problems or become a public health nuisance.

- Non-hazardous demolition debris contaminated with lead from structures which have received one or more coats of lead-based paint may be accepted for disposal at the landfill under this plan provided the following conditions are met:

    - If the waste is ground prior to entry into the landfill, then a hazardous waste determination will need to be provided by the generator, and leachable lead shall not exceed 1.5 mg/L; or

    - If the waste is un-ground prior to entry into the landfill and is classified as non-hazardous, landfill operations will not contribute to additional grinding or shredding of the waste during disposal operations.

  - Demolition debris will be taken directly to the active face and shall be covered with one foot of municipal solid waste or six inches of clean soil in order to minimize any grinding activity that may occur during normal solid waste disposal operations.

- Materials from oil, gas and geothermal activities subject to regulation from the RRCT will be disposed of at the landfill in accordance with the provisions and requirements of this plan provided RRCT approval is obtained, if required.

9.0 DISPOSAL OF SPECIAL WASTES

Special wastes as defined by 30 TAC §330.3 are accepted at the facility in accordance with 30 TAC §330.171. 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; and
- Sludges, grease trap waste, grit trap waste or liquid waste from municipal sources.

9.1 Health Care Related Facilities

In accordance with 30 TAC §326.75(r), treated medical waste may be managed as routine waste unless otherwise specified in 30 TAC §326.75(r)(1)-(5).

9.2 Dead Animals

The site may receive dead animals or slaughterhouse wastes that are delivered to the site independent of other wastes. Dead animals or slaughterhouse 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.

9.3 Regulated Asbestos Containing Materials

Regulated Asbestos Containing Materials (RACM) may be accepted at the facility in accordance with 30 TAC §330.171(c)(3)(I) and 30 TAC §330.173(c). The entire waste fill volume, as described within this permit document, is dedicated for the disposal of RACM. Prior to the initial receipt of RACM at this facility, the District Manager will identify a specific area of the site for receipt of RACM. Prior to the initial receipt of RACM at this facility the District Manager will also prepare a contingency plan in case of ruptured bags and designate appropriate personnel for implementation of the contingency plan,

including procedure for the collection and disposal of the spilled material. As the operation continues, the District Manager will identify additional areas within the already designated waste fill areas for 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 District 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 below natural grade level when possible and practical. Where this is not possible or practical, RACM will be placed in landfill units such that it will not be exposed in the future as a result of erosion or weathering of the intermediate and/or final cover. RACM that is placed above natural grade must be located in the landfill unit at a minimum of 20 feet away from exterior final sideslopes, and at least 10 feet below final grade. During unloading and placement of RACM in the waste fill, care will be exercised to prevent breaking open the bags or containers. One foot of soil cover or 3 feet of asbestos-free municipal solid waste will be placed over the RACM immediately after it is placed in the landfill unit.

RACM that has been designated as Class 1 industrial solid waste, and that arrives at the facility will be disposed of in accordance with§330.173(c) and §330.173(g)-(h), as described in Section 5.5 and 5.6 of the Special Waste Acceptance Plan.

The location of the area designated to receive the RACM is the entire constructed waste footprint of the landfill. The landfill will maintain on site a record of each load of RACM accepted describing its location, depth, and volume of material in cubic meters or yards. A copy of the current site diagram identifying the RACM area shall be submitted to the executive director immediately upon completion of the diagram (i.e. final closure of an area).

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.

9.3.1 RACM Contingency Plan

This contingency plan has been developed in the event that a spill of RACM occurs during unloading operations. Personnel involved in the response are to be kept to a minimum to reduce the risk to employees. The district manager or his designated representative shall be in charge of the landfill's spill response for RACM. The following procedures will be followed in the event of a spill of RACM at the landfill:

A. Personal Protection

1) Get upwind of the RACM.

2) Employees involved in cleanup should make use of their spill control kits, including:

   a. Respirator

   b. Disposable coveralls

   c. Shoe covers

   d. Gloves

   e. Safety glasses or goggles

3) Keep others away until cleanup is complete.

B. Personal Protection

1) Notify the landfill office/site manager.

2) Should the spill involve one pound or more, the site manager or his designated representative will notify the National Response Center (NRG).

C. Emergency Cleanup Actions

1) Summon water truck, wet down waste with a misting spray of water.

2) Scoop the waste and put it into a properly labeled bag or a closed container and dispose of it with the other RACM.

3) Wash any contaminated equipment or machinery.

4) Dispose of gloves, coveralls, and shoe covers in a tightly sealed 6-mil plastic bag.

5) Wash all other personal protective equipment with soap and water.

6) Check respirator and refit with new filter cartridges, and place into a resealable, airtight container for future use.

D. Spill Response Equipment

1) An Occupational Health and Safety Administration (OSHA) approved respirator with the proper prefilters

2) A disposable, Tyvek or similar coverall suit

3) Disposable gloves

4) Rubber boots

5) 6-mil plastic bags with asbestos warning.

6) Water spray tank

7) Roll of duct tape

8) Broom and shovel

E. Emergency Response Contractor

1) The district manager may contract with an outside contractor to conduct the spill response for RACM at the Landfill.

ATTACHMENT 1 - SPECIAL WASTE ACCEPTANCE FORM

Express Waste Profile

Disposal Facility: 3430 Victoria Landfill TX

Waste Profile #

Sales Rep #

I. Generator Information

Generator Name:

Generator Site Address:

City: County: State: --Select State-- Zip:

State ID/Reg No: State Approval/Waste Code: NAICS #:

Generator Mailing Address ☐ (if different)

City: County: State: --Select State-- Zip:

Generator Contact Name: Email:

Phone Number: Ext: Fax Number:

II. Billing Information

Bill To: Contact Name:

Billing Address: Email:

City: State: --Select State-- Zip: Phone:

III. Waste Stream Information

Name of Waste:

☐ Weathered Wood ☐ RCRA Empty Containers ☐ Treated Medical Waste ☐ Animal Carcass (non-infectious)

☐ Friable Asbestos ☐ Nonfriable Asbestos ☐ Tires ☐ Meth Contaminated Debris

Has a sample of this waste been taken? ☐ Yes ☐ No

Process Generating Waste:

Method of Shipment: --Select Shipment Method-- Complete if "other"

Frequency: --Select Frequency--

Estimated Annual Volume: Volume Type: --Select Volume Type--

Color: Odor:

IV. Certification

I hereby certify that I have knowledge about the waste material being offered for disposal ("Waste") and have the requisite authority to bind the Generator to the information contained in this Special Waste Profile ("Profile"). I further certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the Waste and all known or suspected hazards have been disclosed. All Analytical Results/Safety Data Sheets submitted are truthful and complete and are representative of the Waste.

I further certify that by utilizing this Profile, neither myself nor any other employee or representative of the company identified below ("Company") will deliver for disposal or attempt to deliver for disposal any Waste that: (i) is classified as toxic waste, hazardous waste or infectious waste; (ii) that does not conform to this Profile; or (iii) that this Disposal Facility is prohibiting from accepting by law. I shall immediately give written notice of any change or condition pertaining to the Waste not provided herein. Our Company hereby agrees to fully indemnify this Disposal Facility against any damages resulting from this Profile or Certification being inaccurate or untrue.

I understand that by attaching an electronic signature, I am signing this document and Company consents to complete this transaction and receive all related communications electronically, and agrees this document will be binding as though it had been physically signed. A printout of this Profile may be accepted with the same authority as the original.

Authorized Representative Name (Printed)	Title (Printed)	Company Name

Authorized Representative Signature	Date

BURNS McDONNELL

CREATE AMAZING.

8911 N. Capital of Texas Highway
Building 3, Suite 3100
Austin, TX 78759
O: 512-872-7130
www.burnsmcd.com

APPENDIX C – ALTERNATIVE DAILY COVER OPERATING PLAN

APPENDIX C
Alternative Daily Cover Operating Plan

Prepared for:

City of Victoria (Owner)
Republic Services of Texas, Ltd. (Operator)

Originally Prepared by:

SCS Engineers
TBPE Registration No. F-3407
12651 Briar Forest, Suite 205
Houston, Texas 77077
281-397-6747

April 2012

Approved under Permit 1522A

Permit Modification Final Action

Issued August 28, 2012

The references to page numbers are reflective of the approved final action from 2012. The document was included as Part IV, Appendix G in the 2012 submittal.

City of Victoria Municipal Landfill MSW-1522A
Permit Modification

APPENDIX G
Alternative Daily Cover Operating Plan

Prepared for:

City of Victoria (Owner)
Republic Services of Texas, Ltd. (Operator)

Prepared by:

SCS Engineers
TBPE Registration No. F-3407
12651 Briar Forest, Suite 205
Houston, Texas 77077
281-397-6747

4/5/12

STATE OF TEXAS
JEFF M. HARRIS
53812
REGISTERED
PROFESSIONAL ENGINEER

Jeffrey M. Harris

Pgs. 1, G-1 THRU G-5, INCLUSIVE

April 2012

SCS Project No. 16208530.08

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PART IV – SITE OPERATING PLAN

APPENDIX G

ALTERNATIVE DAILY COVER OPERATING PLAN (ADCOP)

1.0 INTRODUCTION

The City of Victoria Municipal Landfill is operated by Republic Services of Texas, Ltd. This document presents the Alternative Daily Cover Operating Plan (ADCOP) for this site. This document is prepared in accordance with the requirements set forth in 30 TAC §330.165(d) and has several references to the EPA document entitled "The Use of Alternative Materials for Daily Cover at Municipal Solid Waste Landfills" by Frederick G. Pohland and Johannes T. Graven, July 1993.

The ADCOP includes the following as required by Texas Commission on Environmental Quality (TCEQ) regulations:

1. A description and minimum thickness of the Alternative material to be used,
2. Its effects on vectors, fires, odors and windblown litter and waste,
3. The operational methods to be utilized at the site when using this alternative material,
4. Chemical composition of the material and the Material Safety Data Sheet(s) (MSDS) for the alterative material, and
5. Any other pertinent characteristic, feature or other factors related to the use of this alternative material.

The evaluation of the effectiveness of the different alternative daily cover (ADC) will generally be based on comparisons with soil cover.

ADC materials which may be used at this site are synthetic material tarps both reusable and sacrificial.

ADC may be used to cover waste except when the landfill is to be closed for a period of greater than 24 hours or an alternative length of time approved for the site by the TCEQ.

2.0 DESCRIPTION AND MINIMUM THICKNESS OF THE ALTERNATIVE MATERIAL

A variety of commercial synthetic tarps are available for use as landfill daily cover. Kym Industries, Inc. Geotex 2200 FR or 2400 BT FR, Thor PolyShield 200 Black or an equivalent tarp, will be used at this site. The Geotex 2200 FR, manufactured by Kym Industries, 207 Smith Road, Slocomb, AL 36375, is a black polypropylene slit film with carbon black (3.5%) and fire retardant (1.5%) additives. The fire retardant used in the Geotex products is Ciba CGL 116. The CGL-116 product is an N-alkoxy hindered amine light stabilizer (NOR-HALS). It is a long-term thermal and UV light stabilizer for polyolefins that also acts synergistically with flame retardants to retard combustion in polyolefin fibers and molded parts. The average weight of the Geotex 2200 FR tarp is 7.5 oz/yd^2. The Geotex 2200 FR has a Mullen Burst strength of 340 psi, a grab tensile warp strength of 160/200 pounds (warp/weft). The minimum thickness of the Geotex 2200 FR and 2400 BT FR is 19 mils. For additional information about the Geotex products see Attachment G-1.

3.0 EFFECT ON VECTORS, FIRES, ODORS AND WINDBLOWN LITTER

The proposed ADC materials will provide for the functions of daily cover in the same manner as soil.

Tarps provide waste coverage so that control of windblown waste, vectors and odor is provided. The material is treated with a fire retardant and provides uniform waste coverage. The tarp material provides a physical and visual barrier. The weight of the product is sufficient to prevent windblown waste issues.

In the event of a waste fire, the actions described in the Site Operating Plan will be implemented. ADC materials will not be used in the area of a waste fire until the fire has

been completely controlled. If ADC material is present when a waste fire begins, the ADC material will either be removed or covered with soil.

4.0 OPERATIONAL METHODS UTILIZED AT THE SITE WHEN USING THE ADC

The selected ADC for use at the Victoria Landfill is a synthetic material tarp(s). Using standard landfill equipment and site personnel, the tarp is placed over the waste and secured along the sides and ends with soil or other heavy items at the end of the each working day. The tarps are removed in the morning using landfill equipment and site personnel. If sacrificial tarps are utilized, they shall be subsequently covered with new waste on the next working day. If the active face has an irregular shape or is larger than can be covered with available tarps, the standard 6" soil daily cover will be applied to the active face perimeter to "square it" to appropriate dimension prior to applying the tarp to ensure complete coverage of the waste. The tarp will be applied to the working face by laying it on the working face or rolling it out on the working face. To minimize tears, the tarp will not be forcibly dragged across the active face. Tarps should overlap each other on the active face perimeter. Up slope tarps should lap over down slope tarps in a shingle fashion to minimize water infiltration.

5.0 CHEMICAL COMPOSITION OF THE MATERIAL AND MATERIAL SAFETY DATA SHEET(S) FOR THE ALTERNATIVE MATERIAL

Material Safety Data Sheets (MSDS) supplied by the tarp manufacturer are provided in Attachment G-1.

6.0 OTHER PERTINENT CHARACTERISTICS, FEATURES OR OTHER FACTORS RELATED TO THE USE OF THE ADC

The operator should consider various site-specific issues when determining how to best utilize the ADC. Examples include:

- High wind or other adverse weather conditions may make tarp deployment unsafe for workers.
- A steep slope may be better managed by soil cover.

ATTACHMENT G-1
MSDS INFORMATION FROM TARP MANUFACTURER

CITY OF VICTORIA MUNICIPAL LANDFILL
PERMIT MODIFICATION
MSW-1522A
VICTORIA COUNTY, TEXAS

ATTACHMENT G-1
MATERIAL SAFETY DATA SHEETS

Prepared for:

REPUBLIC SERVICES OF TEXAS, LTD. (OPERATOR)

2575 IH 35 South, Suite 103

San Marcos, Texas 78666

Prepared by:

SCS ENGINEERS
Texas Board of Professional Engineers Registration No. F-3407
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April 2012

4/5/12

STATE OF TEXAS
JEFF M. HARRIS
53812
REGISTERED
PROFESSIONAL ENGINEER

Jeffry M. Harris

KYM INDUSTRIES, INC

GEOTEX 2200 FR

FABRIC SPECIFICATIONS

Material :	95% polypropylene,3.5% net carbon black, **1.5% fire retardant additive
Yarn:	black polypropylene slit film 1300 denier warp, 2000 denier weft
Weave:	12 yarns in warp X 12 yarns in weft per sq. inch
Weight:	7.5 oz/ sq. yd.
Tensile Grab Strength:	warp 160 pounds, weft 200 pounds According to ASTM D751
Tear Strength:	warp 70 pounds, weft 85 pounds According to ASTM D751
Mullen Burst Strength:	340 pounds According to ASTM D751
UV Resistance:	More than 80% resistance after 2000 hours of Sunlight exposure

** Ciba CGL 116

207 Smith Road
Slocomb, AL 36375

KYM INDUSTRIES, INC

GEOTEX 2400 BT FR

FABRIC SPECIFICATIONS

Material : 95% polypropylene,3.5% net carbon green, **1.5% fire retardant Additive :	
Yarn:	green polypropylene slit film 1500 denier warp, 2000 denier weft
Weave:	15 yarns in warp X 15 yarns in weft per sq. inch
Weight:	9.5 oz/ sq. yd.
Tensile Grab Strength:	warp 260 pounds, weft 300 pounds According to ASTM D751
Tear Strength:	warp 170 pounds, weft 185 pounds According to ASTM D751
Mullen Burst Strength:	440 pounds According to ASTM D751
UV Resistance:	More than 80% resistance after 2000 hours of Sunlight exposure

** Ciba CGL 116

207 SMITH ROAD
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