130 ENVIRONMENTAL PARK
CALDWELL COUNTY, TEXAS
TCEQ PERMIT APPLICATION NO. MSW 2383

TYPE I PERMIT APPLICATION

PART IV

SITE OPERATING PLAN

Prepared for

130 ENVIRONMENTAL PARK, LLC

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Firm Registration No. F-834

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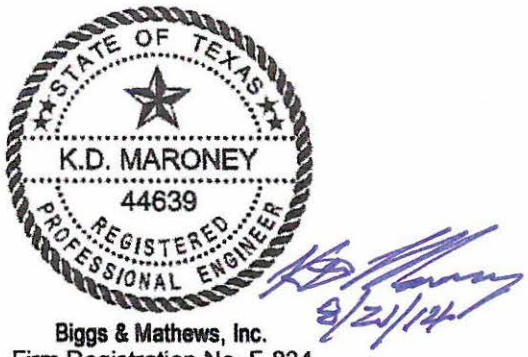

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- A stockpile of earthen material will be maintained so that it is available at all times to extinguish a fire. ~~Two separate~~A soil stockpile~~s~~ will be provided in the vicinity of the active working face. ~~One stockpile will be provided adjacent to the active working face, and a second~~The soil stockpile will be provided within ~~2,500~~1,000 feet of the active working face. The landfill equipment conducting daily waste filling operations will be suitable for placement of additional soil from the earthen stockpile for fire control.

- The total volume of earthen material available from the ~~two~~ stockpile~~s~~ will be sized to cover the working face with a minimum six-inch layer of earthen material. The earthen material stockpile~~s~~ shall be provided consistent with the size of the active working face based on the following table:

Size of Working Face		~~Area~~ Volume of Soil to Cover Working Face			Total Size of Stockpile~~s~~
		Sq Ft	Cu Ft	Cu Yd	
L	W	L x W	Sq Ft x 0.5	Cu Ft/27	Cu Yd x 1.15
100	100	10,000	5,000	185	213
100	150	15,000	7,500	278	319
100	200	20,000	10,000	370	426
110	200	22,000	11,000	407	468

- The landfill equipment identified in Table 4-1 is sufficient to cover the active working face with a minimum six-inch soil layer from the earthen material stockpile~~s~~, within one hour of detecting a fire.

- The soil stockpile ~~adjacent to~~located within 1,000 feet of the active working face will be maintained to provide a minimum of 468 cy of soil for an active working face size of 0.5 acres.

- The dozer and compacter operating at the active working face will cover the active working face with 6-inches of soil in one hour. The achievable production rates for each are as follows:

    - Dozer Capacity (3.5 cy/load) x Production Rate (150 load/hr) = Material Rate (525 cy/hr)

    - Compactor Capacity (3.5 cy/hr) x Production Rate (150 load/hr) = Material Rate (525 cy/hr)

- ~~A soil stockpile or soil borrow area will be provided within 2,500 feet of the active working face and will be maintained to provide a minimum of 468 cy of soil for an active working face size of 0.5 acres.~~

- The excavator, haul trucks, and/or scraper operating at the soil stockpile or soil borrow area will provide the required volume of soil to replenish the active working face soil stockpile in one hour. The required volume of soil to be delivered for a 0.5 acre active working face soil stockpile is 468 cy. The production rate for the haul truck and scraper is based on an average of 12 mph. The achievable production rates for each are as follows:

    - Excavator Capacity (3 cy/load) x Production Rate (240 load/hr) = Material Rate (720 cy/hr)

    - Haul Trucks Capacity (16 cy/load) x Production Rate (30 load/hr) = Material Rate (480 cy/hr)

    - Scraper Capacity (20 cy/load) x Production Rate (30 load/hr) = Material Rate (600cy/hr)

- ~~The active working face size will be limited to the material rate that the dozer and compactor is required to achieve to cover the active working face with 6-inches of soil in one hour. An active working face that exceeds 0.5 acres will require either larger equipment with a greater production rate or additional equipment.~~

- ~~The active work face size will be limited to the material rate of the excavator, haul trucks and/or scraper operating at the soil stockpile or soil borrow area to provide the required volume of soil to replenish the active working face soil stockpile in one hour. An active work face that exceeds 0.5 acres will require either larger equipment with a greater production rate or additional equipment.~~

- A separate soil stockpile of at least 60 cy will be maintained adjacent to the RACM disposal area only on days when RACM is being accepted. This stockpile will cover the 50-foot by 50-foot maximum disposal area with 6-inches of soil in one hour.

- A separate soil stockpile of at least 468 cy of soil will be maintained adjacent to the non-inert reusable materials staging area. This stockpile will cover the 0.5-acre maximum non-inert materials stockpile area with 6-inches of soil in one hour.

- A separate soil stockpile of at least 275 cy of soil will be maintained adjacent to the wood waste processing area. This stockpile will cover the 125-feet by 100-feet wood waste processing area with 6-inches of soil in one hour.

- Dedicated fire extinguishers will be located at the citizen's convenience center.

- An adequate supply of water under pressure is available for firefighting purposes for the storage and processing facilities located within the landfill footprint. These facilities include the Reusable Materials Staging Area for non-inert materials, Large Item Storage Area, Used / Scrap Tire Processing Area, and the Wood Waste Processing Area. The supply of water under pressure is provided by the water truck as identified in Table 4-1.

- A supply of water under pressure for the Reusable Materials Staging Area inert materials is not required.

- An adequate supply of water under pressure is available for firefighting purposes for the storage and entrance facilities located within the facility entrance area. These facilities include the Citizen's Convenience Center, Large Item Storage Area, and the Used / Scrap Tire Storage Area. The supply of water under pressure is provided from the above ground water storage tank located adjacent the Transfer Station as provided under Registration No. 40269.

7.2 Specific Firefighting Procedures

The following procedures will be followed in the event of a fire:

- If a fire occurs on a vehicle or piece of equipment, the equipment operator should bring the vehicle or equipment to a safe stop. If safety of personnel will allow, the vehicle must be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine should be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment. Fire extinguishers should be used to extinguish the fire if possible, without risk to the equipment operator.

- Incoming loads with burning waste will be prevented from being unloaded in the active working face of the landfill. The gate attendant and equipment operators will be alert for signs of these loads, such as smoke, steam, or heat being released from incoming waste loads. Should a load with burning waste be observed at the gate or active working face, the gate attendant or equipment operator will direct the driver to a designated area away from the active working face to unload. The load will be covered with soil to smother the fire.

- If a fire is in the working face, the burning area should be isolated or pushed away from the active working face before the fire can spread to other areas of the working face. If isolating or pushing the fire is not feasible or is unsafe, the working face should immediately be covered with earthen material from the stockpile to smother the fire.

- If a fire occurs at the citizen's convenience center, landfill personnel should use fire extinguishers to extinguish the fire, if possible. The general rules for fires will be implemented as included in Section 7.3 to protect landfill personnel or visitors.

- Firefighting methods include smothering with soil, separating burning material from other waste, and spraying with water from the water truck or water pumped

from nearby ponds or streams. Water under pressure is available from the above ground water storage tank and the water truck for firefighting purposes. If detected soon enough, a small fire may be fought with a hand-held fire extinguisher. Fire extinguishers will be located at the gatehouse, maintenance building, citizen's convenience center, and all landfill heavy equipment. Under this circumstance, the fire area should also be watered or otherwise controlled to ensure that the fire is out.

7.3 General Rules for Fires

The following rules will be implemented in the event of a fire at 130 Environmental Park:

- Immediately contact the gatehouse and site manager. Equipment operators will be equipped with two-way radios or cell phones.
- Alert other facility personnel. Equipment operators will be equipped with two-way radios or cell phones.
- Assess extent of fire, possibilities for the fire to spread, and options for extinguishing the fire.
- If it appears that the fire can be safely fought with available fire-fighting devices, attempt to contain or extinguish the fire.
- If landfill personnel cannot extinguish the fire, contact the Fire Department by calling 911.
- Upon arrival of the Fire Department personnel, direct them to the fire and provide assistance as appropriate.
- Do not attempt to fight the fire alone.
- Do not attempt to fight the fire without adequate personal protective equipment.
- Be familiar with the use and limitations of fire-fighting equipment available on site.

7.4 Fire Protection Training

Landfill personnel will be trained in the contents of Section 7 – Fire Protection Plan in accordance with Section 3.3 – Training. Landfill personnel will maintain a thorough understanding of this SOP and will be trained in fire prevention and fire control as defined in this section. The following topics will be addressed:

- Identification of burning waste, smoke, steam, or heat being released from incoming waste loads
- Procedures to prevent and contain fuel spills

- Fire prevention
- Fire safety
- Firefighting procedures with fire extinguishers, soil, and water as appropriate
- Notification procedures should a landfill fire be observed

In addition, information will be provided to the local fire department regarding waste disposal operations, fire sources, and firefighting techniques related to landfills. Documentation of training will be placed in the site operating record in accordance with Section 3.3.

7.5 TCEQ Notification

In the event of a fire that is not extinguished within 10 minutes of detection, the TCEQ region office will be contacted immediately after detection, but no later than four hours by phone and in writing within 14 days. The notification will include a description of the fire and resulting response.

disposal services for special events, inclement weather, emergencies and other circumstances. 130 Environmental Park will notify the TCEQ regional office and will record waste acceptance hours outside of posted hours in the site operating record.

130 Environmental Park is authorized for site operations 24 hours per day, seven days per week. Site operations include construction, earthmoving, monitoring, transportation of construction materials, heavy equipment operation, and other non-waste acceptance operations.

130 Environmental Park will be closed to waste acceptance ~~or waste disposal operations~~ on Sunday.

8.4 Site Signs

A sign will be displayed at the gated entrance to the site. This sign will measure at least four feet by four feet, and have lettering of at least three inches in height. The sign will state the name of the site, type of site, hours and days of waste acceptance, hours and days of site operation, and the TCEQ permit number. An emergency 24-hour contact phone number and the local emergency fire department phone number will also be included. The emergency contact phone number will reach an individual with the authority to obligate the facility at all times the facility is closed. The site sign will be readable from the facility entrance.

8.5 Control of Windblown Solid Waste and Litter

The working face will be maintained and operated in a manner to control windblown solid waste. Windblown material and litter will be collected and properly managed to control unhealthy, unsafe, or unsightly conditions 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 gatehouse. A sign will be prominently displayed at the gatehouse stating that all loads shall be properly covered.

- The active working face will be limited to as small an area as practical for the safe operation of the incoming waste hauling vehicles, operation of compaction equipment, and delivery and placement of daily cover soils, and alternative daily cover.

- Daily cover or alternative daily cover will be applied to assist with the control of windblown waste.

- The facility will provide litter control fences, as necessary, at appropriate locations near the working face and elsewhere. The litter control fences will be constructed of wire or plastic mesh screens attached to portable or permanent frames or temporary fences. The litter control fence will be of sufficient height and will be located as close as practical to the active area to control windblown waste and litter.

8.10 Odor Management Plan

130 Environmental Park will manage odors associated with waste acceptance and disposal operations, and operation of the storage and processing areas consistent with this Odor Management Plan. This plan addresses sources of odors and includes general instructions to control odors or sources of odors.

Measures to control odors and sources of odors may include, but are not limited to, the following items:

- Sources of odors may include ponded water, decomposition of wastes, leachate, contaminated water, and landfill gas (LFG).

- Wastes that are considered to generate significant odors are usually classified as special wastes. Refer to Section 8.20 – Disposal of Special Wastes for waste disposal procedures for odorous wastes.

- Unloading of these wastes at the active working face will be consistent with procedures established in Section 8.2 – Unloading of Waste, which limits the active working face to a minimum width, allowing prompt placement of daily cover or alternative daily cover over wastes that may produce odors.

- Upon unloading of these wastes at the Citizen's Convenience Center, they will be placed promptly into steel roll-off containers as established in Section 8.2 – Unloading of Waste. Wastes collected in these containers will be transported to the active working face for disposal daily.

- Spills of these odor producing wastes will be managed by collecting and transporting these wastes to the active working face for prompt disposal.

- Daily cover consisting of a minimum of six inches of soil or approved alternative daily cover will be placed over these wastes at the end of the working day consistent with procedures established in Section 8.18 – Landfill Cover.

- Waste that is determined to require additional procedures will be isolated within the active working face and immediately covered with a minimum of three feet of other solid waste or a minimum of one foot of earthen material upon receipt. Additional daily cover soil will be placed if needed.

- Ponded water at the site will be controlled as detailed in Section 8.19 of this SOP. Odors will be controlled through regrading of areas consistent with Section 8.18 – Landfill Cover.

- Leachate and contaminated water will be managed in accordance with Part III, Attachment D6 – Leachate and Contaminated Water Management Plan. Leachate will be transferred from the leachate collection system either directly to an enclosed liquid transfer vehicle or an on-site enclosed leachate storage tank(s).

- Odor reduction may be achieved by adjustments to the existing gas extraction system or by the installation of additional gas extraction wells within the landfill footprint.

- Refer to Part III, Attachment B, Section 3 for additional requirements related to cleaning of the storage and processing facilities to eliminate the potential for contaminated water.

- The facility incorporates on-site buffers for odor control related to the storage and processing facilities. The minimum buffer distance from the storage and processing facilities to the facility boundary is 267 feet.

8.11 Disease Vector Control

The need for vector control (control of rodents, flies, mosquitoes, etc.) will be minimized through daily site operations. Activities designed to control on-site populations of disease vectors include minimization of the size of the active working face; placement of daily, intermediate, and final cover; adherence to the ponded water plan; and following the detailed procedures described in this SOP. 130 Environmental Park will conduct inspections of the daily cover as required by Section 8.26 – Site Inspection and Maintenance Schedule to observe waste disposal operations and to remediate areas that may be conducive to insects and rodents. These areas will be promptly addressed in accordance with procedures established in this SOP. Should daily operations not control vectors, a licensed professional will apply pesticides to ensure that proper chemicals are used and that they are properly applied.

8.12 Site Access Roads

The entrance road provides access from US183 to the gatehouse and other entrance facilities for waste hauling vehicles, operating personnel, and visitors. The entrance road will transition to an all-weather, crushed stone, gravel, concrete rubble, masonry rubble, wood chips, or other similar materials surface beyond the gatehouse and entrance facility area. Other internal landfill roads will be constructed with crushed stone, gravel, concrete rubble, masonry rubble, wood chips, or other similar materials. The all-weather surface entrance, access, and internal roads will provide mud control for the waste hauling vehicles prior to exiting the site and returning to public access roads. During wet weather conditions the site manager will routinely inspect the site and implement measures to further minimize mud tracking onto public access roads, as necessary. Speed bumps along the main access roads between the fill areas and the gatehouse will help jar mud from vehicles. Should mud or other associated debris be tracked onto US183, the material will be removed daily.

A truck wheel wash station may be used to further minimize tracking onto public roads, as necessary. Water from the wheel wash will be collected and stored in a concrete settlement basin for reuse in the wheel wash. Periodically, the settlement basin will be drained and the sediment will be removed from the basin, or the sediments within the settlement basin will be solidified in place and then removed from the basin. The periodic removal of mud and contaminated water will provide odor control. The wash

water will be hauled to an authorized off-site facility for treatment and disposal. The sediment, following solidification and passing the paint filter test, will be disposed of in the landfill.

Dust on the landfill haul roads and access roads will be controlled by periodic spraying from a water truck. During dry weather conditions the site manager will routinely inspect the site and establish a frequency, if necessary, to spray the access roads with water to prevent nuisance conditions from developing. Grading equipment will be used weekly to control or remove mud accumulations on internal roads, including the entrance road, as needed. Stockpiles of crushed stone, concrete rubble, masonry demolition debris, or other similar material will be available for use in maintaining passable internal access roads, including regrading to minimize depressions, ruts, and potholes. Refer to Section 8.26 of this SOP for the site inspection and maintenance schedule. The site entrance road, landfill haul road, and access roads will be maintained in a clean and safe condition. Litter and debris will be picked up daily and returned to the active working face.

8.13 Salvaging and Scavenging

Salvaging will not be allowed to interfere with prompt sanitary disposal of solid waste or to create public health nuisances. Salvaged materials will be considered as potential recycled materials. Salvaged items will be removed from the site on an as-needed basis, but will not be stored in excess of 180 days, to prevent the items from becoming a nuisance, to preclude the discharge of pollutants from the area, and to prevent an excessive accumulation of the material at the site. Special wastes received at the site will not be salvaged. Pesticide, fungicide, rodenticide, or herbicide containers will not be salvaged unless they are salvaged through a state-supported recycling program. Scavenging will be prohibited at all times and not allowed.

8.14 Endangered Species Protection

Development of the landfill shall be conducted to avoid and minimize potential impacts to endangered or threatened species. The facility and the operation of the facility will not result in the destruction or adverse modification of the critical habitat of endangered or threatened species, or cause or contribute to the taking of any endangered or threatened species.

A detailed threatened and endangered species survey and assessment was conducted by a qualified biologist at Halff Associates. The survey, assessment, and coordination with the United States Fish and Wildlife Service (USFWS) and the Texas Parks and Wildlife Department (TPWD) regarding endangered and threatened species is provided in Part II, Appendix IIE – Endangered or Threatened Species Documentation.

A species protection plan is included as Appendix IVC and shall be followed during facility development and operation. No adverse impacts to threatened or endangered species are anticipated as a result of construction or operation of 130 Environmental Park.

8.15 Landfill Gas Control

The control and monitoring of landfill gas for 130 Environmental Park will be in accordance with the Landfill Gas Management Plan (LFGMP) included in Part III, Attachment G. The LFGMP was developed in accordance with §330.371. The LFGMP provides for inclusion of applicable documentation, including monitoring records for landfill gas monitoring probes, in the site operating record, and for submittal to the executive director. Gas monitoring records will be maintained in the site operating record.

8.16 Oil, Gas, and Water Wells

There are no known wells within the waste footprint or within the permit boundary. Should any unknown abandoned water, crude oil, or natural gas wells, or other well associated with mineral recovery, be discovered, 130 Environmental Park will provide written notification to the TCEQ executive director as described below. Plugging and abandonment of any well within the waste footprint will be completed as depicted in the plugged well completion detail provided in Part III, Attachment D3 – Construction Design Details, Drawing D3.2 – Liner Details.

8.16.1 Water Wells

A copy of the well plugging report for any water well found during facility development will be submitted to the appropriate state agency and to the executive director within 30 days after the well is discovered. A permit modification will be submitted to the executive director if revisions to the liner installation plan are required as the result of well abandonment.

8.16.2 Oil and Gas Wells

There are no known existing or abandoned crude oil or natural gas wells (see Part II, Appendix IIA, Drawing IIA.5) within the 130 Environmental Park permit boundary.

If any abandoned crude oil or natural gas wells or other wells associated with mineral recovery are located during site development, the operator will provide the executive director of the TCEQ with written notification of the well's location within 30 days after its discovery. Within 30 days after plugging of any such well, the facility operator shall provide the executive director with written certification that 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. Any producing crude oil or natural gas well that does not affect or hamper landfill operations may be operated within the site if identified in the permit for the landfill or in a written notification to the executive director.

8.17 Compaction

Compaction of incoming waste provides more efficient use of available space and reduces the amount of settling after the fill is complete. Compaction of the waste will be accomplished by a landfill compactor weighing in excess of 40,000 pounds. The site dozer will be used to compact waste should the compactor be temporarily out of service for repairs. Adequate compaction will be accomplished to minimize future consolidation and settlement, and provide for the proper application of intermediate and final cover. The incoming waste will be spread in layers and thoroughly compacted by repeated passages of compaction equipment.

The site manager or designee will be present during the placement of the first five feet of waste over the liner system. The site manager or designee will verify and document that the initial five feet of waste does not contain large bulky items that could damage the liner system or that cannot be adequately compacted.

8.18 Landfill Cover

8.18.1 Soil Management

Management of soil for use in and around the landfill area will be an ongoing process at 130 Environmental Park. In general, soil for use as daily cover, intermediate cover, final cover, and other uses will be available from areas within the permit boundary. Soil will be obtained from excavation that is ongoing as part of the development of future landfill cells or from other suitable sources. This material may be available near the working face (the exact distance varying daily, weekly, etc., depending on the exact stage of development).

In addition to the available material located within the site, stockpiles of material will be kept available on site. Stockpiles will consist of soil that has not previously come in contact with waste, and will be of sufficient volume to provide at least one day's application of six inches of daily cover over the working face. As this stockpile is used, it will be replenished. The soil may also be used in emergency situations for fire control, as discussed in Section 7.

8.18.2 Daily Cover

Daily cover of waste controls disease vectors, windblown waste, odors, fires, scavenging, and promotes runoff from the covered fill area. At least six inches of well-compacted soil cover material that has not been previously mixed with garbage, rubbish, or other solid waste will be placed over all solid waste at the end of each operating day, if alternative daily cover is not used. Refer to Section 8.18.4 for authorized alternative daily cover materials and placement procedures.

To ensure that the daily cover soil will be adequate (i.e., minimize vectors, contaminated stormwater runoff, odors, etc.) the following procedures will be followed:

- The daily cover will be sloped to drain.
- The daily cover will be well compacted with the dozer tracks to minimize infiltration of stormwater, graded to drain, and will not have any waste visibly protruding through it.
- The site manager or his designee will document where daily cover has been placed and visually inspect during placement that a minimum of six inches (compacted thickness) of daily cover soil has been placed and that no waste is exposed through it. The site manager or his designee shall document, on a daily basis, the daily cover placement area and indicate that he has visually verified the thickness and condition in the Cover Inspection Record, as discussed in Section 8.18.8.
- Runoff from areas that have intact daily cover is not considered to have come into contact with the working face or leachate and is considered uncontaminated stormwater runoff.
- After each rainfall event, the site manager or his designee will inspect all daily cover areas for erosion, exposed waste, or other damage and repair as necessary. Runoff from damaged or eroded areas will be handled as contaminated water until repairs are completed.

Areas with six inches of daily cover must be inspected daily for erosion, ponded water, seeps, protruding waste, or other detrimental conditions. Once the area becomes active again, the daily cover may be stripped off prior to additional waste placement and used as daily cover in other areas.

8.18.3 Intermediate Cover

All areas that receive waste and then become inactive for longer than 180 days will be covered with well-compacted earthen material, for a total cover thickness of at least 12 inches. The intermediate cover will be graded to prevent erosion and ponding of water. Six inches of earthen material will be capable of sustaining native plant growth and will be seeded or sodded following its application for erosion control. Plant growth and other erosion control features placed as part of the intermediate cover will be maintained. Runoff from areas that have received intermediate cover is not considered to have come into contact with the active working face or leachate, and is considered uncontaminated stormwater runoff.

8.18.4 Alternative Daily Cover

130 Environmental Park plans to use alternate daily cover material (ADC) in the future. There are no ADC materials included in the application; the operator may propose ADC in the future. Before a specific ADC is used at the site, the operator will seek authorization from the TCEQ. The ADC, if authorized, will be limited to a 24-hour period

after which either waste or daily cover as defined in §330.165(a), and applied as described in Section 8.18.2 of this SOP, must be placed.

8.18.5 Temporary Waiver

130 Environmental Park does not anticipate requesting a waiver from the cover requirements of §330.165(a), (c), and (d) due to extreme climatic conditions. Should the landfill decide to request a temporary waiver due to extreme seasonal climatic conditions, the landfill will request a temporary waiver in accordance with §330.165(e).

8.18.6 Final Cover

Final cover placement over individual areas will be in accordance with Part III, Attachment H – 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 cover will be repaired promptly by restoring the cover material, grading, compacting, and seeding it as necessary. Such periodic inspections and restorations are required during the entire operational life and for the postclosure maintenance period. Refer to Section 8.26 for a site inspection and maintenance schedule.

In general, 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 layer elevation.

- The final cover system layers will be constructed. Testing of the various components of the final cover system will be performed in accordance with Part III, Attachment D8 – Final Cover Quality Control Plan.

- A final cover certification report complete with an as-built survey will be prepared by an independent registered 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 cover inspection record, as described in Section 8.18.8, will be updated to reflect the area where final cover has been placed. The TCEQ region office will also be notified that final cover placement has occurred at the site.

8.18.7 Erosion of Cover

Intermediate cover will be inspected on a weekly basis. The final cover system, including the erosion control structures, will be maintained during and after construction. During the active life of the site, the final cover system will be inspected on a weekly basis. Erosion gullies or washed out areas of the intermediate or final cover, which are deep enough to jeopardize the intermediate or final cover, will be repaired within five days of detection. Repair of final cover includes restoring cover, grading, compacting,

and seeding as required. An eroded area is considered to be deep enough to jeopardize the intermediate or final cover if it exceeds four inches in depth as measured perpendicular from the slope face or surface. Should additional time be required for repairs due to weather related delays, the landfill will notify the TCEQ region office of an alternate schedule. Documentation of weather delays for the repairs will be included in the cover inspection record. Weekly inspections and restorations are required for the active life of the landfill. Refer to Section 8.26 for the site inspection and maintenance schedule. Documentation of inspections, detection of erosion, and completion of repairs are required in accordance with Section 8.18.8 – Cover Inspection Record.

Postclosure care inspection and repair procedures of the final cover are outlined in Part III, Attachment I – Postclosure Plan.

8.18.8 Cover Inspection Record

Throughout the landfill operation, a cover inspection record will be maintained and be readily available for inspection in accordance with §330.165(h). For daily cover, intermediate cover, and alternative daily cover, the record will specify the date cover was accomplished (no exposed waste), area covered (by use of the grid system), how it was placed, and when it was completed. For final cover, the record will show the final cover area completed, date cover was applied, and thickness of final cover. The final cover certification report for each area will be referenced in the record. Each entry in the record will be certified by the signature of the site manager or designee that the work was accomplished as stated in the record. The cover inspection record will document inspections required under Section 8.18.7 – Erosion of Cover, §330.165(g) including findings, and corrective action taken.

8.19 Ponded Water

130 Environmental Park will prevent ponding of water over areas that have received waste through site operations including grading and maintenance. The facility will prevent ponding of water within the storage and processing facilities through operational requirements for each of these facilities. The Ponded Water Plan provides direction to the landfill operations for the prevention and elimination of ponded water. The Ponded Water Plan follows:

- Daily cover, intermediate cover, and final cover will be placed in accordance with requirements established in Section 8.18 – Landfill Cover.
- The surface of areas that have received waste and landfill cover will be inspected consistent with Section 8.18 – Landfill Cover and Section 8.26 – Site Inspection and Maintenance Schedule.
- Site grading and maintenance as required by Section 8.18 will minimize the ponding of water over areas containing waste.

- Should ponding of water occur, the depressions will be filled in and regraded within seven days of the occurrence, weather permitting. Landfill cover will be repaired consistent with procedures specified in Section 8.18.

- Diversion berms and containment berms are constructed and maintained at the active working face to minimize contaminated water within the active working face in accordance with Part III, Attachment D6 – Leachate and Contaminated Water Plan.

- Ponded water will be minimized and removed from within the storage and processing facilities in accordance with the design and operational procedures provided in Part III, Attachment B for each of these facilities.

- If the ponded water has come into contact with waste, or waste contaminated soils, it will be treated as contaminated water and handled in accordance with Part III, Attachment D6 – Leachate and Contaminated Water Management Plan.

8.20 Disposal of Special Wastes

Special wastes, as defined in §330.3, may be accepted for disposal at the facility in accordance with §330.171(b) and (c).

As specified in §330.171(b)(2), requests for approval to accept special wastes must be submitted by the generator to the TCEQ executive director or 130 Environmental Park. The request must include the following:

- A complete description of the chemical and physical characteristics of each waste and the quantity and rate at which each waste is produced and/or the expected frequency of disposal, including a statement if waste is or is not a Class I industrial waste as defined in §330.3.

- An operational plan containing the proposed procedures for handling each waste and listing required protective equipment for operating personnel and onsite emergency equipment.

- A contingency plan outlining responsibility for containment and cleanup of any accidental spills occurring during the delivery and/or disposal operation.

The approval for acceptance and disposal of special wastes at 130 Environmental Park will be waste-specific consistent with §330.171(b)(1). The executive director may authorize the receipt of special waste. The landfill is not required to accept the waste.

130 Environmental Park will not accept the following special wastes: untreated medical waste, dead animals, slaughterhouse waste, municipal hazardous waste from a conditionally exempt small quantity generator, sewage sludge, grease trap waste, grit trap waste, or liquid wastes from municipal sources. The facility will not accept contaminated soil that exceeds 1,500 parts per million (ppm) or a constituent of concern exceeding levels in §335.521(a)(1), Table 1.

The following special wastes may be accepted at the facility without prior written authorization in accordance with §330.171(c).

8.20.1 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). Empty containers will be disposed if they have been triple rinsed prior to receipt, rendered unusable prior to receipt, and covered by the end of the same working day with solid waste or daily cover.

8.20.2 Nonregulated Asbestos-Containing Materials

Non-regulated asbestos-containing materials (non-RACM) may be accepted for disposal provided the wastes are placed on the active working face and covered in accordance with §330.171(c)(4) and Section 8.18 of this SOP. Under no circumstances shall any material containing non-RACM be placed on any surface or roadway which is subject to vehicular traffic or disposed of by any other means by which the material could be crumbled into a friable state.

8.20.3 Regulated Asbestos-Containing Materials

Regulated Asbestos Containing Material (RACM) may be accepted for disposal in accordance with §330.171(c)(3) and will be handled in accordance with the procedures in Appendix IVB – Regulated Asbestos-Containing Material Plan.

8.21 Disposal of Industrial Waste

Industrial waste is defined by §330.3 as solid waste resulting from or incidental to any process of industry or manufacturing, or mining or agricultural operations. Class 2 and Class 3 industrial solid wastes may be accepted at the facility, provided disposal of these wastes does not interfere with proper operation of the facility.

Class 1 industrial solid waste requiring executive director approval pursuant to §330.173 will not be accepted, except RACM that has been designated Class 1 industrial solid waste due to its asbestos content, which will be accepted in accordance with the procedures in Section 8.20.3. Refer to Section 5 – Detection and Prevention of Disposal of Prohibited Wastes and Section 8.2 – Unloading of Waste for waste screening procedures. Refer to Appendix IVB – Regulated Asbestos-Containing Material Plan for handling practices of RACM during disposal operations.

8.22 Visual Screening of Deposited Waste

Existing topography and vegetation provide natural screening of deposited waste. Visual screening of deposited waste is provided as part of normal waste disposal and cover placement operations and sequence of development. Final cover will be placed as the landfill reaches final contours. As the site is developed, the visual effect of the disposal activities will be minimized through the use of screening provided by fencing, constructed berms, planted vegetation, and natural vegetation located within the buffer zone.

8.23 Leachate and Gas Condensate Recirculation

130 Environmental Park will not recirculate leachate and landfill gas condensate. Refer to Part III, Attachment D6 – Leachate and Contaminated Water Management Plan.

8.24 Contaminated Water Discharge

130 Environmental Park will not discharge contaminated water from the facility without the specific written authorization from TCEQ. All water coming in contact with waste or contaminated soils will be treated as contaminated water and managed following the procedures set forth in Part III, Attachment D6 – Leachate and Contaminated Water Management Plan. The landfill will be operated consistent with §330.15(h)(1)-(4) regarding discharge of solid wastes or pollutants.

8.25 Storage and Transfer Unit Operations

8.25.1 Large Item Storage Area

A storage area for large items and white goods may be provided within the waste disposal footprint or may be provided near the citizen's convenience center. Large items and white goods include ovens, dishwashers, freezers, air conditioners, and other large items. The large item storage area will receive approximately one ton of large items and white goods per day and have a maximum amount of 180 tons of material stored at one time. These items may be recycled to prevent a nuisance and to preclude discharge, but will not be stored in excess of 180 days. The average length of time these items will be stored at the facility before recycling is 90 days. Large items that are not recycled will be disposed of at the working face. The procedures for the acceptance, storage, processing, and disposal of large items are addressed in Section 8.9.

The large item storage area, when located within the waste disposal footprint, will be placed only over areas that have received intermediate cover. The intermediate cover will be maintained as required by Section 8.18.3 – Intermediate Cover, and Section 8.18.7 – Erosion of Cover. Surface water runoff will be diverted around the large item storage area by placement of earth diversion berms. Surface water runoff from the large item storage area will be contained by placement of earth containment berms to preclude discharge from this area. Containment and diversion berms will be placed, and runoff from the area managed, consistent with Part III, Attachment D6 – Leachate and Contaminated Water Plan.

A storage area for large items and white goods may be provided near the citizen's convenience area. The large items and white goods are transferred into steel roll-off containers for storing until transport to an off-site recycler or disposed of. The containers will be covered with tarps during a rainfall event to prevent contaminated water from being generated.

8.25.2 Reusable Materials Staging Area

Inert materials such as brick, concrete, etc., and non-inert materials such as asphalt may be received and staged at the facility for use as roadbase materials for facility access

roads and staging areas or erosion control in drainage structures. Asphalt pavement will not be used for erosion control in drainage structures. The size of the stockpiles may vary depending on the amount of inert materials received at any given time. Since the brick and concrete materials are inert, runon and runoff from rainfall will not be controlled in a special manner for these materials. Since asphalt pavement or asphaltic concrete is not an inert material, it will be managed in a manner that will prevent runoff of contaminated water, discharge of waste, or creation of nuisance conditions. These inert and non-inert materials will continuously be reused for site operations, and there is no time limit on the storage of these materials. The reusable materials staging area will receive approximately 250 tons of inert materials per day and have a maximum amount of 2,000 tons of material stored at one time. The reusable materials staging area will receive approximately 50 tons of non-inert material per day and have a maximum of 500 tons of material stored at one time.

A recyclable materials storage and staging area is provided for source-separated recyclable materials, including asphalt and other materials.

8.25.3 Citizen's Convenience Center

A citizen's convenience center for waste drop-off will be located within the site entrance facilities. The unloading area will include a minimum of two (2) 30 to 40-cubic yard roll-off containers for collection of solid waste. The citizen's convenience center will receive approximately 20 tons of municipal solid waste per day and have a maximum amount of 20 tons of municipal solid waste stored at one time. 130 Environmental Park will transport full containers to the active working face for disposal. Waste in the containers will be disposed of by the end of each working day. The average length of time waste will be stored at the Citizen's Convenience Center is 7 hours, the maximum amount of time waste will be stored is 14 hours. The containers will be covered with tarps during a rainfall event to prevent contaminated water from being generated.

The roll-off containers will be steel containers that are leak-proof, durable, and designed for safe handling and easy cleaning. The containers will be reusable and maintained in a clean condition so they will not constitute a nuisance and will retard the harborage, feeding, and propagation of vectors. The containers will be mechanically handled and will be designed to prevent spillage or leakage during storage handling, or transport.

The citizen's convenience center will have a sign posted at the entrance to the center stating the rules governing the use of the citizen's convenience center including authorized users and types of waste accepted.

An area for citizen recyclables drop-off boxes may be provided outside the citizen disposal facility for drop-off of source-separated recyclable materials. Recyclable materials will be collected and stored in closed containers. The storage of source-separated recyclable materials will be in accordance with §330.209.

8.25.4 Used/Scrap Tire Storage Area

130 Environmental Park will not intentionally or knowingly accept whole used or scrap tires for disposal unless processed prior to disposal in a manner acceptable to the

executive director. Scrap tires will be accepted from the public or from community clean-up efforts and stored in containers or trailers prior to shipment. Scrap tires identified during landfill operations and generated through maintenance will be accumulated on site by placing them in containers or trailers prior to shipment. The total quantity of tires will not exceed 500 scrap tires (or weight equivalent tire pieces) on the ground, or 2,000 scrap tires in containers. Tires will not be stored in excess of 90 days. The average amount of time that tires will be stored is 45 days. Tire containers will be kept within the facility boundary, near the active working face, or citizen's convenience center. Manifests will be used for shipment of scrap tires offsite.

8.25.5 Wood Waste Processing Area

Source separated yard trimmings, clean wood materials, and vegetative material will be directed to the wood waste processing area. The wood waste processing area will receive approximately three tons of material per day for processing and have a maximum amount of approximately 100 tons of material stored for processing at one time. The wood waste processing area will be located over existing lined areas and will process all incoming yard trimmings, clean wood materials and vegetative materials, which will include trees and brush, into mulch after visual inspection. The resulting wood chips and mulch will only be used on-site and will be stored in the processing area for a maximum time of 60 days after being processed. The average length of time that wood chips and mulch will be stored is 30 days after being processed. The resulting wood chips and mulch will be stored in small piles within the processing area so as not to result in litter and will be managed to prevent fire, safety, or health hazards in accordance with 30 TAC §330.209(a). The wood waste processing area will not be larger than approximately 50 feet by 100 feet.

8.25.6 Leachate Storage Facility

Leachate and landfill gas condensate will be pumped from the leachate sumps directly to transport trucks or to an existing on-site leachate storage facility through a leachate forcemain. 130 Environmental Park will continually evaluate the leachate production rate to determine if and when the existing leachate storage tank will be used.

The leachate storage facility will be located near the landfill footprint. The storage facility consists of two 250,000-gallon steel storage tanks, which will be installed individually as needed based on leachate generation. The calculations in Part III, Attachment D6, Appendix D6-D demonstrate that the secondary containment area, consisting of reinforced concrete slab and walls, provides containment volume for 110 percent of the volume of one leachate storage tank and precipitation from the 25-year, 24-hour storm event with 12 inches of freeboard.

The maximum amount of leachate that can be stored on site at any time is 500,000 gallons. The maximum amount of time leachate will be stored during the postclosure condition is 12 months. The average amount of time is 6 months.

8.25.7 Truck Wheel Wash

The truck wheel wash station is a drive through structure that may be used to further minimize tracking onto public roads, as necessary. Water from the wheel wash will be collected and stored in a concrete settlement basin for reuse in the wheel wash. Periodically, the settlement basin will be drained and the sediment will be removed from the basin, or the sediments within the settlement basin will be solidified in place and then removed from the basin. The wash water may be hauled to an authorized off-site facility for treatment and disposal if not solidified in place. The sediment, following solidification and passing the paint filter test, will be disposed of in the landfill. The sediment will have no free liquids as confirmed by the paint filter liquids test. The truck wheel wash is located in the entrance facility area.

The maximum amount of sediment stored in the truck wheel wash is approximately 100 cubic yards. The sediment will not be stored in excess of 90 days. The average length of time sediment will be stored is 30 days.

8.26 Site Inspection and Maintenance Schedule

Item	Task	Schedule	Inspector	Type of Inspection
Fence/Gate	Inspect perimeter fence and gate for damage, gaps, intrusions, and the like. Make repairs if necessary.	Weekly	Site manager or Designee	Document in the Site Operating Record
Windblown Waste	Police working face area, wind fences, access roads, entrance area, and perimeter fence for loose trash. Clean up as necessary.	Daily	Site manager or Designee	Document in the Site Operating Record
Waste Spilled on Route to the Site	Police entrance area and all roads for at least 2 miles in either direction of site entrance for loose trash. Clean up as necessary.	Daily when site is in operation	Site manager or Designee	Document 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	Site manager or Designee	Document 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.	Weekly – more often during wet weather or extended dry weather periods.	Site manager or Designee	Document in the Site Operating Record
Daily Cover	Inspect for proper placement, thickness, and compaction. Correct problems as needed.	Daily at the active face. All daily cover areas will be inspected daily and after each rainfall event.	Site manager or Designee	Document in the Site Operating Record
Intermediate Cover	Inspect for proper placement, thickness, erosion, compaction, and for presence of waste or other contamination. Correct problems as needed.	Weekly and within 24 hours of a rainfall event of 0.5 inch or more. Repair erosion within five days of detection.	Site manager or Designee	Document in the Site Operating Record

8.26 Site Inspection and Maintenance Schedule – Continued

Item	Task	Schedule	Inspector	Type of Inspection
Final Cover	Inspect for proper placement, thickness, compaction, slope, settlement, and erosion. Maintenance will be ongoing throughout postclosure care period. Correct problems as needed.	Weekly and within 24 hours of a rainfall event of 0.5 inch or more. Repair erosion within five days of detection.	Site manager or Designee	Document in the Site Operating Record
Leachate	Record depth of leachate in sump, as required.	Monthly	Site manager or Designee	Document in the Site Operating Record
Ponded Water	Inspect daily cover, intermediate cover, and final cover areas for potential areas that may pond water. Regrade as required. Remove ponded water over intermediate and final cover areas. Contaminated ponded water removed in accordance with Attachment D6 – Leachate and Contaminated Water Management Plan.	Daily at active face and daily cover areas. Weekly for intermediate and final cover areas. Remove ponded water within seven days of occurrence, weather permitting.	Site manager or Designee	Document in the Site Operating Record

8.27 Ventilation and Air Pollution Control – Storage and Processing Facilities

This section provides for ventilation and air pollution control as required by §330.245 for the large item storage area, reusable materials staging area, citizen's convenience center, used/scrap tire storage area, and the wood waste processing area.

These storage and processing facilities are not enclosed structures and will be operated to provide adequate ventilation for odor control and employee safety. Ventilation is not an issue; however, dust control will be in accordance with current TCEQ MSW Air Permitting rules and regulations applicable to municipal solid waste facilities.

The facility manager will ensure that the municipal solid waste processing facilities do not violate any applicable requirement of the approved State Implementation Plan developed under the Federal Clean Air Act §110, as amended.

The facility, including the storage and processing facilities, will obtain authorization under Chapter 116 or Chapter 330, Subchapter U, as applicable, prior to commencing construction of the facility, as required by §330.245(b).

Reporting of emissions events will be made in accordance with §101.201 (relating to Emissions Event Reporting and Recordkeeping Requirements) and reporting of scheduled maintenance will be made in accordance with §101.211 (relating to Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements), as required by §330.245(f).

No significant air pollution emissions are expected as a result from the operation of these facilities. If air pollution emission capture and abatement equipment is utilized, it will be properly maintained and operated consistent with §330.245(e).

~~8.27.1 Odor Management Plan~~

~~The facility is located in Caldwell County outside the extraterritorial jurisdiction of the City of Lockhart.~~

~~The storage and processing facilities will manage odors associated with waste acceptance and processing operations consistent with this Odor Management Plan. This plan addresses sources of odors and includes general instructions to control odors and/or sources of odors associated with operation of the storage and processing facilities.~~

~~Measures to control odors and sources of odors will include, but are not limited to, the following items:~~

- ~~Sources of odors may include ponded water, decomposition of wastes, leachate and contaminated water.~~
- ~~Wastes that are considered to generate significant odors are typically classified as special wastes, including medical waste, sewage, dead animals, and/or~~

slaughterhouse wastes, sludge, grease trap waste, grit trap waste, and liquid waste from municipal sources. As noted in Section 8.20, the facility will not accept these wastes.

- The citizen's convenience center will accept municipal solid waste from residences only. Municipal solid waste is considered a potential odor producing waste.
- Municipal solid waste received at the citizen's convenience center will be placed promptly in roll-off containers. Full containers will be transported to the landfill working face and waste remaining in containers will be transported at the end of each working day for disposal.
- Spills of wastes at the citizen's convenience center will be promptly picked up and loaded into the roll-off containers.
- Refer to Section 8.25 for additional operation requirements for the storage and processing facilities related to preventing nuisance conditions.
- Refer to Part III, Attachment B, Section 2 for additional facility design requirements and Section 3 for additional requirements related to cleaning of the storage and processing facilities to manage contaminated water.
- Recyclable materials will be placed in roll-off boxes for transport to appropriate end-use markets.
- The facility incorporates on-site buffers for odor control. The minimum buffer distance from the storage and processing facilities to the facility boundary is 267 feet.

8.27.2 Ponded Water

Any ponded water at the storage and processing facilities will be controlled to avoid its becoming a nuisance. In the event that objectionable odors do occur, appropriate measures will be taken to alleviate the condition. Site grading and maintenance will minimize the ponding of water over the operational areas.

8.28 Health and Safety

Facility personnel will be trained in the appropriate sections of the facility health and safety plan in accordance with Section 3 – Personnel and Training.

8.29 Employee Sanitation Facilities

Potable water and sanitary facilities will be provided for all employees and visitors at/near the scale house and/or maintenance building. Bottled water will be provided for potable water. Sanitary facilities, consisting of portable sanitary facilities and/or constructed restrooms, will be provided. A private contractor will remove and properly dispose of all wastewater from sanitary facilities not managed in a properly permitted on-site sewage facility; wastewater from sanitary facilities will not be placed in the facility's contaminated water storage tank.