

**RESPONSE 95**

Records and written descriptions of the type and amount of introductory and continued training provided to each employee will be maintained in the SOR. Facility personnel must take part in an annual review of the initial training described in this SOP.

#### **4.2 Control of Prohibited Waste §330.127(5)**

The facility has and will continue to implement a comprehensive program for waste screening that minimizes the potential for inadvertent acceptance of prohibited wastes. The program consists of four primary elements:

1. Special/Industrial Waste Screening Program: Pre-screening customers bringing special waste and industrial waste to the facility. A detailed description of the special waste screening process is provided in the Special Waste Acceptance Plan (SWAP).
2. Random Load Inspections: The facility will implement a minimum of five~~2~~ random load inspections per week.
3. Prohibited Waste Training Program: Training will be provided to gatehouse personnel and equipment operators annually on prohibited waste recognition. This training plan is described in more detail in the following sections.
4. Gatehouse Waste Screening Program: During hours of operation, the gatehouse will be staffed with at least one gate attendant. The attendant will screen incoming customers to help ensure that no prohibited wastes are being brought to the landfill. In addition, the facility will provide a sign in a conspicuous location that will list wastes that are prohibited for acceptance at the landfill. The Gatehouse Waste Screening Program is described in detail in the following sections.

The approaches described above are proactive policies that, in combination, are designed to minimize the potential that the site will receive hazardous or otherwise unacceptable waste for disposal. Implementation of the program provides protection from the potential dangers that prohibited waste could pose to employees, the public, or the environment through improper management, and serves as a hazardous waste and polychlorinated biphenyl (PCB) waste screening mechanism that minimizes the potential of these waste streams entering the landfill. These programs specifically require pre-acceptance screening procedures be followed to determine if a particular waste is non-hazardous and to determine the acceptability of the waste pursuant to facility permit conditions, applicable regulations, and operating capabilities. These programs are implemented in a number of ways, including reviewing waste streams prior to acceptance, monitoring under the supervision of qualified site personnel of waste arriving at the gate, and observing the waste being disposed of at the working face by equipment operators.

Appropriately trained personnel will observe each load that is disposed of at the landfill and will perform random load inspections. This could include the Landfill Manager or the Equipment Operator. Staff with other position titles (e.g., the Environmental Compliance Manger, a third-party contractor, etc.) may also perform the inspections, provided they have been trained in Hazardous Waste Identification, Load Inspections, Prohibited Wastes, and Random Load Inspections.

The following sections discuss in detail the methods and procedures that will be used to control prohibited wastes at the site.

#### **4.2.1 Detection and Prevention of the Disposal of Regulated Hazardous Waste**

Regulated hazardous waste, as defined in 40 Code of Federal Regulations (CFR), Part 261, PCB wastes, as defined in 40 CFR, Part 761, wastes listed under 30 TAC §330.15(e), and other wastes specifically excluded for acceptance (e.g., Class 1 non-hazardous industrial waste other than regulated asbestos-containing material [RACM], which is Class 1 due to asbestos content) will not be accepted at the facility, with the exception of regulated hazardous waste from Conditionally Exempt Small Quantity Generators (CESQG). Procedures to detect and prevent these types of wastes from entering the site include:

- Informing facility customers of prohibited wastes by posting one or more signs at the facility entrance listing prohibited wastes
- Screening waste streams prior to acceptance at the gate and through procedures detailed in the SWAP for special waste
- Performing random inspections of incoming loads in accordance with procedures described in Section 4.2.3
- Detaining and/or rejecting loads that are suspected of containing prohibited waste
- Maintaining records of all random inspections
- Training appropriate facility personnel responsible for inspecting or observing loads to recognize prohibited waste, including regulated hazardous waste or PCB waste
- Remediating any prohibited waste, regulated hazardous waste, or PCB waste discovered at the site in accordance with Section 4.2.4

#### **4.2.2 Prohibited Wastes §330.15(e)**

The acceptance and disposal of the following prohibited wastes will not be allowed at this site:

- Regulated Hazardous Waste other than from CESQGs. Hazardous waste from a CESQG may be accepted, provided the generator provides a certification that it generates no more than 220 pounds of hazardous waste per calendar month.
- PCBs, as discussed in Section 4.2.1.
- Class 1 Industrial Waste, with the exception of wastes that are Class 1 only because of asbestos content, as further described in Section 4.25, Disposal of Industrial Waste.
- Do-it-Yourself (DIY) used motor vehicle oil, per §330.5(e)(2), shall not be intentionally or knowingly accepted for disposal.
- Lead acid batteries, per §330.15(e)(1), shall not be intentionally or knowingly accepted for disposal.
- Whole used or scrap tires, per §330.15(e)(4), shall not intentionally or knowingly be accepted for disposal.
- Items containing chlorinated fluorocarbons (CFCs), such as refrigerators, freezers, and air conditioners, will only be accepted at the site if the generator or transporter provides written certification that the CFC has been evacuated from the unit and that it was not knowingly

allowed to escape into the atmosphere. The LM or designated alternate will screen customers to determine if refrigerant has been evacuated from the appliance or shipment of appliances. Such verification must include a signed statement from the person from whom the appliance or shipment of appliances is obtained that all refrigerant that had not leaked previously has been recovered from the appliance or shipment of appliances in accordance with 40 CFR §82.156(g) or (h), as applicable. This statement must include the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered or a contract that refrigerant will be removed prior to delivery. The facility will notify persons who may deliver such items of the requirement to verify evacuation of refrigerant by signage or letter. Without written certification, CFC containing appliances will be considered to still contain CFCs.

- Liquid waste (any waste material that is determined to contain “free liquids,” as deemed by US Environmental Protection Agency (USEPA) Method 9095 (Paint Filter Test), as described in “Test Methods for Evaluating Solid Waste: Physical/Chemical Methods” (USEPA Publication Number SW-846)) shall not be disposed of unless it is:
  - Bulk or non-containerized liquid waste that is:
    - Household waste other than septic waste
    - Leachate or gas condensate derived from the Temple RDF managed and disposed of in accordance with the SDP presented in Part III
  - Contained liquid waste:
    - The container is a small container similar in size to that normally found in the household waste
    - The container is designated to hold liquids for use other than storage
    - The waste is a household waste
- Used oil filters from internal combustion engines, per §330.171(d)
- Special wastes that are not identified in Table 1 of the Special Waste Acceptance Plan included as Appendix IV of this SOP.

Landfill personnel will check for indications of prohibited waste as detailed below. The landfill personnel inspecting or observing loads will be appropriately trained to recognize prohibited waste.

One of the most important means to control the disposal of prohibited waste at the landfill is by the control of access into the facility by unauthorized vehicles. This issue is addressed in Section 4.5 of this operating plan (Access Control). If landfill personnel suspect prohibited waste is present in an incoming load, then that load will be directed to an area out of the flow of traffic, and trained personnel will further assess the load. If the load is determined to contain prohibited waste, or if there is any suspicion that it may contain a prohibited waste, the load will be rejected and directed back to the generator. Documentation of the inspection will be placed in the SOR within 7 working days. The documentation will include the date, time, name of the inspector(s), type of inspection/screening (i.e., suspected prohibited waste), transporter/generator information, and waste information. This documentation may be provided in a waste discrepancy report. A typical form is included in Appendix IVA of this SOP.

Landfill gate attendants will be trained to recognize potential sources of prohibited waste, such as microelectronics manufacturers, electronic companies, metal plating industry, automotive and vehicle repair service companies, and dry cleaning establishments.

#### **4.2.3 Random Inspections §330.127(5)(A) & (D)**

The SWAP provides for the pre-screening of all commercial customers bringing industrial or special waste to the landfill (see Appendix IVEF). This plan has been and will continue to be an essential element to preventing the acceptance or disposal of prohibited wastes. An additional element in preventing the acceptance or disposal of prohibited waste is random inspections. The gate attendant, or other designated landfill personnel, will randomly select a minimum of ~~five~~<sup>two</sup> vehicles per week (including compactor vehicles) for inspection, notify the equipment operator, and direct the selected load to the working face. Once the selected load arrives at the working face, the equipment operator will direct the vehicle to a separate but adjacent location on the working face out of the flow of normal disposal traffic. The driver will be instructed to discharge the load onto the ground. The equipment operator will then visually inspect the contents of the load and document the contents of the load including the presence of any prohibited waste. The Load Inspection Report Form in Appendix IVB will be used to document results of the random load inspection. If prohibited waste is observed, it will be returned to the transporter. The TCEQ ED and the local pollution agency with that requests to be notified, will be notified of any incident involving the receipt or disposal of regulated hazardous waste ~~other than CESQG~~ or PCB waste received at the landfill.

Loads that are excluded from random inspections are:

■ ~~Waste from transfer stations, providing that the transfer station is permitted or registered by the TCEQ and conducts random screening (waste received from transfer stations is already subject to visual inspections and random screening prior to arrival at the facility)~~

- Liquid waste
- Asbestos waste

The documentation on the Load Inspection Report Form in Appendix IVB will include information such as the date and time of inspection, name and signature of inspector(s), type of inspection/screening (i.e., random screening, suspected unauthorized waste, etc.), transporter/generator information (including hauling company name and license plate number), source of waste, contents of load as reported by driver, contents of load as observed by inspector, and approval or disapproval of the load. The inspection report will be placed in the SOR within 7 days of the inspection.

Collectively, providing customers with information about prohibited wastes, reviewing proposed waste streams prior to acceptance, training site personnel, inspecting suspicious loads, observing the unloading and disposal at the working face, and conducting random load inspections make up a comprehensive prohibited waste prevention program.

#### **4.2.4 Prohibited Waste Remediation Plan §330.127(5)(E)**

In the event that prohibited wastes are received at the facility, the following procedures will be implemented. Remediation procedures for any prohibited waste that has been inadvertently placed in the landfill unit may range from will include:

- Defining the extent of the prohibited waste that has been unloaded and disposed of in the landfill and excavating the waste.
- Loading prohibited waste back onto generator's vehicle or loading waste in an on-site container, tarping, testing, and removing the waste to an approved off-site facility. Containers will be marked appropriately with words for the type of prohibited waste it contains, such as "Hazardous Waste" or "PCBs."
- Implementing appropriate health and safety procedures when handling the prohibited waste.

Remediation procedures for the incident will be documented and included in the SOR within 7 days.

Upon determination that a waste is a prohibited waste and will not be accepted, the LM or designated alternate will make arrangements for returning such waste to the generator and/or coordinating transportation to a facility approved to receive the specific waste in question.

### **4.3 Other Site Activities**

Other site activities may arise that are not discussed in this plan. The LM, or designated alternate, has responsibility for on-the-job training of those activities and ensuring that they are conducted as required by the site permit, TCEQ regulations, or any other local, state, or federal regulation. Some of these activities are briefly discussed below.

#### **4.3.1 Liquids Restrictions**

The landfill shall not accept bulk or non-containerized liquid waste for direct disposal unless it is household waste other than septic waste. The restriction of bulk or non-containerized liquids, with the exception of household waste other than septic waste, is intended to control a source of leachate. Liquid waste refers to any waste that is determined to contain free liquids by using USEPA Test Method 9095B-paint filter liquids test. The facility may recirculate leachate or gas condensate waste into active cells with composite liners.