

**RESPONSE 97**

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.