

Modern Technology-Modern Environment

Ms. Sarah Welborn
Environmental Permit Specialist
Municipal Solid Waste Permits
Waste Permits Division
Texas Commission on Environmental Quality

5 August 2009

Delivered to:

12100 Park 35 Circle
Building F, MC 124
Austin, TX 78753

Re: Gulley - Hurst, LLC- MSW Permit No. 2349
Municipal Solid Waste, Nueces County
Response to the 1st Technical NOD for
Permit Modification to Revise the Site Operating Plan (SOP)
Tracking No. 12697623; RN 104864608 / CN 602975237

Dear Dr. Carmichael,

This response to the 1st Technical Notice of Deficiency (NOD) is submitted on behalf of Gulley-Hurst, L.L.C., in response to your NOD letter dated 7 July 2009. The attached Site Operating Plan has been revised to address your comments.

Three sets of the revised SOP are included. There are two "clean" sets, one with original signatures and one copy. There is also one set that is marked to identify revisions. The revisions are indicated by a ~~strikeout~~ of old text and shading of the replacement text.

The first and tenth pages of the Part 1 application have been updated and are included with this response.

Each comment and our response is as follows:

1. In accordance with Section (§)330.125(g), please include a statement that the the executive director may set alternative schedules for recordkeeping and notification requirements.

Response: A statement regarding alternative schedules and notification requirements has been added at the end of Section 2.0. Please note that throughout the Site Operating Plan we use the term "TCEQ" as being inclusive of the "executive director" as identified in the first paragraph of Section 1.0.

2. Please include a statement that the inspection of compactor vehicles will be included in the procedures to be used by the owner or operator to control the receipt of prohibited waste per §330.127(5)(A).

Response: A statement has been included in Section 7.0 to indicate that compactor vehicles must be included in the inspection procedure.

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3. In accordance with §330.127(5)(D), please include a statement that the executive director, and any local pollution agency with jurisdiction that has requested to be notified, will be notified of any incident involving the receipt or disposal of regulated hazardous waste or PCB waste at the landfill.

Response: The notification requirement in Section 7.0 and 10.0 have been expanded to include the TCEQ- MSW Permits Section and other local pollution agencies.

4. Per §330.133(f)(1), all Type IV landfill operators that accept rubbish shall provide a written procedure retained on site to ensure that containers with any putrescible wastes are not accepted. Please include a statement that the written procedure will be retained on site.

Response: A statement regarding procedures to ensure that containers with any putrescible waste are not accepted for disposal has been added to Section 10.0.

5. A procedure whereby the transporter certifications required by §330.7(c) of this title must be retained at the landfill and be available for inspection by the executive director per §330.133(f)(3). Please provide this procedure.

Response: A statement requiring that transporter certifications will be maintained at the landfill and will be available for inspection has been added to Section 10.0.

6. Per §330.133(g), Type IV landfill owners or operators shall not accept wastes from completely enclosed containers or enclosed vehicles except in accordance with §330.169. Please include a statement that the Gulley-Hurst Landfill will comply with §330.133(g).

Response: A statement indicating that the facility will comply with §330.133.g has been added to Section 10.0.

7. Per §330.147(c), please include a statement that refrigerators, freezers, air conditioners, and any other items containing chlorinated fluorocarbon must be handled in accordance with 40 Code of Federal Regulations §82.156(f), as amended.

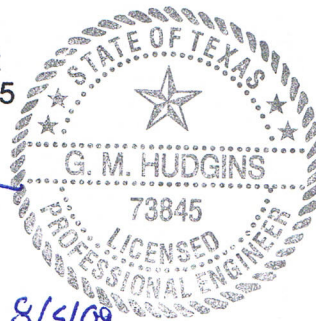
Response: A statement covering CFC containing items has been added to Section 17.0

Please call if I can provide any additional information to aid in your review of the document.

Respectfully submitted,
Modern Technology – Modern Environment
Texas Registered Engineering Firm F-10265



Mitch Hudgins, P.E.



8/5/09

Modern Technology – Modern Environment
548 Naples St. Corpus Christi, TX 78404 (361) 533-7102



Texas Commission on Environmental Quality

Permit or Registration Application for Municipal Solid Waste Facility

Part I

A. General Information

Facility Name:	Gulley- Hurst Type IV Landfill		
Physical or Street Address (if available):	South end of County Road 37 at County Road 26		
(City) (County)(State)(Zip Code):	Nueces	TX	
(Area Code) Telephone Number:			
Charter Number:			

If the application is submitted on behalf of a corporation, provide the Charter Number as recorded with the Office of the Secretary of State for Texas.

Operator Name ¹ :	Gulley- Hurst L.L.C		
Mailing Address:	6421 Saratoga Blvd., Building 101		
(City) (County)(State)(Zip Code):	Corpus Christi	Nueces	TX 78414
(Area Code) Telephone Number:	(361) 992-3873		
(Area Code) FAX Number:	(361) 992-7328		
Charter Number:	800298843		

If the permittee is the same as the operator, type "Same as Operator".

Permittee Name:	Same as Operator		
Physical or Street Address (if available):			
(City) (County)(State)(Zip Code):			
(Area Code) Telephone Number:			
Charter Number:			

If the application is submitted by a corporation or by a person residing out of state, the applicant must register an Agent in Service or Agent of Service with the Texas Secretary of State's office and provide a complete mailing address for the agent. The agent must be a Texas resident.

Agent Name:	Robert B. Gulley		
Mailing Address:	6421 Saratoga Blvd., Building 101		
(City) (County)(State)(Zip Code):	Corpus Christi	Nueces	TX 78414
(Area Code) Telephone Number:	(361) 992-3873		
(Area Code) FAX Number:	(361) 992-7328		

Application Type:

<input type="checkbox"/> Permit	<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Minor Amendment	
<input type="checkbox"/> Registration	<input checked="" type="checkbox"/> Modification	<input type="checkbox"/> Temporary Authorization	
	<input checked="" type="checkbox"/> w/Public Notice		
	<input type="checkbox"/> w/out Public Notice	<input checked="" type="checkbox"/> Notice of Deficiency Response	

¹ The operator has the duty to submit an application if the facility is owned by one person and operated by another [30 TAC 305.43(b)]. The permit will specify the operator and the owner who is listed on this application [Section 361.087 Texas Health and Safety Code].

Signature Page

I, R. Bryan Gulley,
(Operator)

President, Gulley-Hurst, .L.L.C.,
(Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: *R. Bryan Gulley*

Date: 8-5-09

TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR

I, _____, hereby designate _____
(Print or Type Operator Name) (Print or Type Representative Name)

as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.

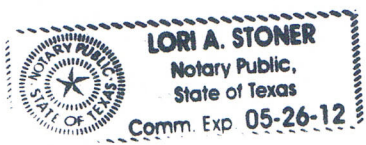
Printed or Typed Name of Operator or Principal Executive Officer

Signature

SUBSCRIBED AND SWORN to before me by the said Lori Stoner

On this 5th day of August, 2009

My commission expires on the 26th day of May, 2012



Lorill Stoner
Notary Public in and for

Nueces County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)

**GULLEY- HURST, LLC TYPE IV LANDFILL
NUECES COUNTY, TEXAS
MSW PERMIT NO. 2349**

SITE OPERATING PLAN

Applicant:

Gulley-Hurst, LLC
6421 Saratoga Blvd, Building 101
Corpus Christi, Texas 78414
(361) 992-3873

Previous Revision: August 4, 2006

Revision Prepared by:

Modern Technology – Modern Environment
Texas Registered Engineering Firm F-10265
548 Naples Street
Corpus Christi, TX. 78404
(361) 533-7102



TYPE IV LANDFILL PERMIT NO. 2349
GULLEY-HURST, LLC.

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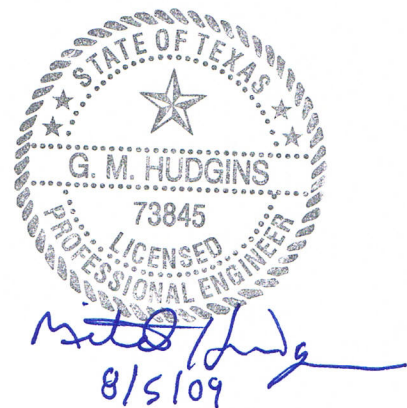
Appendix A

Table 1 - Recordkeeping Requirements

Table 2 - Inspection and Maintenance Tasks

Table 3 - Personnel Types and Descriptions

Table 4 - Site Personnel Training



1.0 INTRODUCTION

The Type IV Landfill will be operated by Gulley-Hurst, LLC. (Gulley-Hurst). This Site Operating Plan (SOP) consists of procedures to be followed by the landfill personnel for operation of the landfill. These procedures are intended to comply with the requirements of Subchapter D (30 TAC §§330.121 - 330.179) of the Texas Commission on Environmental Quality (TCEQ) Municipal Solid Waste Management Regulations (MSWMR), Operational Standards for Solid Waste Land Disposal Sites. Wherever the term TCEQ is included in this document, the term includes the Executive Director of the TCEQ and all TCEQ staff fulfilling their assigned duties.

The specific operational procedures outlined in the SOP must be used by site personnel. A copy of the complete Permit Application for the landfill and a current set of MSWMR will be maintained at the site office in an easily accessible location to allow the site operating personnel to review them as needed.

1.1 Overview of Landfill Development

Activities at the landfill will typically consist of refuse disposal in approved cells, preparation of new disposal areas, construction of auxiliary site components such as drainage structures and roads, and environmental monitoring. Major construction activities may be contracted to an outside construction firm and construction quality assurance/quality control (QA/QC) will be performed by a qualified third party. All activities will be completed in accordance with the facility's permit. Disposal operations are planned for both below and above-grade areas. Disposal operations will only take place in TCEQ-approved cells. Soil will be excavated from future disposal areas or borrow pits for use as cover material as required. Disposal will not begin in any new cell until all construction for that area has been completed, including the associated and drainage and run on/off control structures.

Landfill cells shall be constructed in accordance with the requirements of Part III of the Permit Application. The requirements shall be made specific for each cell construction or phase by preparation of specifications and drawings having sufficient detail for construction. These documents constitute Part V of the Permit Application and shall become a part of the Site Operating Record. These documents should not be submitted to TCEQ for review or

approval. If during the preparation of the documents, the need to change any of the requirements of Part III is discovered, the TCEQ-MSW Permits Section should be consulted and a permit modification (§305.70) shall be prepared and submitted.

As each cell is prepared for receipt of solid waste, activities will include construction of interim access roads, fencing, and drainage facilities. Run-on/run-off berms, ditches, and stormwater management facilities should be constructed concurrent with the cells as described in Part III. As new cells are developed, new access, fencing, and drainage features must tie into existing facilities so that security, all-weather and emergency access, and drainage conveyance are maintained.

Following completion of cell construction, a Soil Liner Evaluation Report (SLER) as described in §330.341 shall be submitted to the TCEQ-MSW Permits Section. The latest version of the SLER form should be obtained before starting a cell construction project. The forms will be supplemented by summaries of the materials, construction process, and testing information and will serve as the basis for TCEQ approval of the cell. The SLER should be submitted sufficiently in advance of waste placement to allow a minimum of 14 days for review plus time necessary to address any comments the TCEQ may have.

As waste disposal operations advance in a cell, ramps and internal roadways will be constructed and maintained to allow access to the working area. Landfill cells shall be developed in a timely manner so that steep interior waste fill slopes are avoided. Stability analyses have been conducted that verify safe interior slopes to 2:1 (horizontal to vertical). Slopes this steep, however, are difficult for maintenance equipment to operate on, so they should be avoided whenever possible.

Weekly cover, interim cover, and drainage control will continue on an ongoing basis. Once the waste fill reaches final grade, final cover will be placed. Final cover will be constructed and documented in accordance with the Site Development Plan.

1.2 Waste Acceptance Plan

The Gulley-Hurst Type IV Landfill will accept solid waste resulting from or incidental to

municipal, community, commercial, industrial, agricultural, and recreational activities, to include, rubbish, non-incinerator ashes, brush, street cleaning, and inert material.

The landfill will receive solid waste, including brush, construction and demolition materials, and rubbish as defined in 30 TAC §§ 330.3(18), (33), and (130), respectively. Class III industrial solid wastes as defined in 30 TAC § 330.3(23) are acceptable if they do not interfere with site operations. Non-regulated asbestos containing materials (Non-RACM) as described in 30 TAC § 330.3(93) may also be accepted. The facility will not receive garbage, household waste, or putrescible waste as defined in 30 TAC §§ 330.3(56), (64), and (119), respectively.

Hazardous wastes and/or radioactive wastes will not be accepted at the Gulley-Hurst Type IV Landfill.

The Gulley-Hurst facility reserves the right to reject any waste material which may cause an odor or nuisance condition or require excessive or special on-site handling requirements or which could possibly cause or lead to environmental deterioration of the site. Waste acceptance, handling, and reporting requirements are addressed throughout this Site Operating Plan.

2.0 RECORDKEEPING REQUIREMENTS (§330.125)

A copy of the permit, the approved site development plan, the site operating plan, the final closure plan, the post-closure maintenance plan, the landfill gas management plan, and any other required plan or other related document shall be maintained at the facility. All information will be available for TCEQ inspection on request.

Copies of documents in the Operating Record will include:

- The Permit
- The Complete Permit Application, including;
 - Site Development Plan,
 - Site Operating Plan,
 - Final Closure Plan,

- Post-Closure Maintenance Plan, and
- Landfill Gas Management Plan, and
- Any other required plan or related document.

Any change or addition to these documents requires written notification to TCEQ.

The Operating Record will also incorporate the following information:

- Location-restriction demonstration reports;
- Inspection records, training procedures, and notification procedures relating to the exclusion of prohibited waste;
- Gas monitoring results and any remediation plans for gasses;
- Liner design, construction, and TCEQ approval documentation for all cells;
- All ground-water monitoring and corrective action data, analyses, and findings;
- Closure activity documentation and post-closure monitoring data;
- Cost estimates and financial assurance documentation relating to closure and post-closure;
- Copies of all correspondence with (to and from) the TCEQ relating to permit modifications, operations, approvals and technical assistance, and;
- Records of all personnel training including types, dates, certifications;
- Personnel operator licenses issued in accordance with 30 TAC Chapter 30, Subchapter F;
- Annual waste acceptance rate information;
- Any other document(s) as specified by the approved permit or by the TCEQ.

In addition to the documents and information listed above: records of random inspections, notifications of the TCEQ of any incidents involving the disposal of any prohibited wastes at the landfill, and provisions for the remediation of the incident will be maintained.

Table 1 in Appendix A includes a list of recordkeeping requirements. Forms and formats for recording and managing the information to be entered in the Operating Record will be developed by the facility manager and staff. Records will be kept in file cabinets or boxes. Files will be labeled and kept in an order that makes placing information into or retrieving

information from the record convenient. A file index or directory will be maintained to allow any of the information to be quickly accessed.

The individual sections of this Site Operating Plan (SOP) address documentation of tasks and events. The rules referenced in the SOP (particularly §330.125) and Table 1 should also be consulted in developing data management formats and procedures.

Routine inspection and maintenance tasks are listed in Table 2 of Appendix A. The table will help to assure that none of the inspection and maintenance tasks are over looked and that timely record keeping will be accomplished.

The record of events or analytical data will be placed in the operating record within seven (7) working days. All information within the Operating Record and plans required for the facility will be retained for the life of the facility, including the post-closure care period. A copy of the information contained in the Operating Record must be furnished upon request to the TCEQ and must be made available for inspection by the TCEQ. The TCEQ may set alternative schedules for recordkeeping and for notification requirements.

3.0 WASTE ACCEPTANCE RATE (§330.125(h) AND-REPORTS §330.675

The initial waste acceptance rate is based on the estimated waste available to the facility. The expected first year value is 202 tons per day and the rate is projected to grow at a rate of 3 % per year. The projected waste acceptance values are included in the Site Life Calculations found in Appendix A of the Site Development Plan.

The quarterly and annual waste acceptance rates shall be reported in accordance with §330.675 and shall be maintained in the Site Operating Record. Quarterly reports will be submitted within 20 days following the end of each fiscal quarter. The State's fiscal year ends on August 31. Quarterly report forms or formats will be obtained from TCEQ. Annual reports will be submitted on TCEQ Form 20011. The due date is included on the form.

The observed waste acceptance rate based on the sum of the previous four quarterly summary reports will be used to evaluate the personnel and equipment required to operate the facility. The tables in the following sections establish personnel and equipment levels. Records of equipment and personnel levels will assist in evaluating compliance with the levels set and determining need changes.

If the annual waste acceptance rate (based on the sum of the previous four quarterly summary reports) exceeds 154,000 tons per year, excluding temporary occurrences, then an application for permit modification in accordance with §305.70(k) will be submitted to revise the waste acceptance rate. The value is based on the initial personnel and equipment levels for up to an average of 500 tons per operating day as indicated within the tables in sections 4.0 and 5.0 below. The application must be submitted within 90 days of the exceedance and must propose a revised acceptance rate and any changes needed to this Site Operating Plan or to physical aspects of the facility to accommodate the increased rate.

Temporary occurrences approved by the TCEQ Region 14 Office for additional waste acceptance to address disaster or emergency situations or other unforeseen circumstances will be documented in the Operating Record. Documentation will include a record of the temporary changes to any of the procedures and personnel/equipment levels outlined in this SOP.

4.0 PERSONNEL (§330.127(1))

Gulley-Hurst will provide on-site management of the landfill operations. On-site landfill personnel during waste acceptance hours will include a landfill manager, a supervisor/lead operator, an equipment operator, an attendant, and a laborer or laborers as required (See Appendix A, Table 3). Either the manager or supervisor must be on-site at all times during waste acceptance hours. If, however, one of the individuals must be away from sight for an extended period, then the other must be present except for brief periods, provided the individual can return to site within 30 minutes of being contacted. Additional personnel will be provided as necessary to effectively manage the waste volume. The landfill manager will

have the authority and responsibility to reject unauthorized loads, have unauthorized materials removed by the transporter and/or assess appropriate surcharges and have the unauthorized material removed by on-site personnel. The landfill manager will be responsible for ensuring that day-to-day operations comply with this Site Operating Plan. A general description of personnel, their qualifications, and responsibilities is given in Appendix A, Table 3.

The landfill manager is responsible for implementing the specific guidance, procedures, and schedules contained in this SOP and ensuring that operating personnel follow the detailed procedures described. All personnel will be instructed to carefully review this SOP, especially the sections that describe procedures associated with their job category and function.

The following schedule sets staffing requirements based on waste receipts for the previously reported four quarters.

Title/Rate in tons per day	Minimum Number Required			
	1-500 tpd	501-1000 tpd	1001-1500 tpd	1501-2500 tpd
Manager	1	1	1	1
Supervisor/Lead Operator	1	1	1	1
Attendant	1	1	2	2
Equipment Operator	1	2	3	4
Clerical Assistant	0	1	1	1
Laborer	0	1	3	4

5.0 EQUIPMENT (§330.127(2))

Equipment to be used at the landfill includes waste-handling, earth-moving, and various maintenance and control items including:

Landfill Compactor A landfill compactor is a purpose-built compactor having footed-drums designed to break-up and compact waste or cover soil and a blade for spreading waste and soil. The compactor shall have a minimum gross weight of 40,000 pounds.

Grader/Maintainer A road grader (or maintainer) is a purpose-built machine used primarily to maintain the surface of on-site roadways. The grader is also a versatile machine for assisting in soil preparation and spreading and towing of light equipment such as pump-sets and stuck or broken vehicles.

Earth Movers Earth movers are any of a combination of equipment used to load, haul, and place soil materials. The equipment will supply soil for weekly and intermediate cover, temporary roads to a working face, and for fire suppression when needed. The equipment may include dump truck with loader, self-loading scraper, scraper with push unit, or tractor-drawn buggies. An earth-moving unit should have a minimum capacity of 10 cubic yards.

Dozer A dozer is used to loosen soil for earth moving and to spread soil or waste. A dozer is a helpful assistant in maintaining the waste at the working face so that the compactor is more efficient as a compactor and is used less to move waste and spread cover soil. A dozer may also be used as a push unit to load scrapers or to loosen soil to make it easier to load.

Water Truck A water truck may be a tank mounted on a truck chassis or may be a trailer drawn by a tractor/truck. The equipment shall include a spreader bar to distribute water for dust control and should include a pump with hose and nozzle so that the unit can assist in fire suppression. The unit shall have a minimum capacity of 2,000 gallons.

Portable Pump Set A portable pump set having a 2-inch minimum inlet diameter will be available at the site. The pump shall include a minimum of 20 feet of inlet-suction hose and 40 feet of discharge hose. The pump can be used to fill the water truck from the pond or other source and to remove stormwater. Additional pumps and hoses may be rented.

Portable Screens Portable screens are used at the perimeter of the waste to control windblown litter. Freestanding sections should be made in convenient length and to a height of ten feet. These sections will be positioned as necessary depending on wind direction. Screen mesh size should be no greater than approximately 2 inches. The stanchion portion should be broad and heavy to resist overturning.

Temporary Fencing Temporary fencing is used in conjunction with portable screens to control windblown litter. The fencing should be at least four feet high and have a screen

mesh size no greater than approximately 2 inches. Posts attached to the fence are driven into cover soil to support the fence. Fence segments may be oriented to direct litter flow to a waste trap area for collection.

The equipment required shall be maintained at the facility according to the following waste acceptance/ rate schedule. The schedule sets equipment requirements based on waste receipts for the previously reported four quarters except during the first year of operation.

Equipment/Rate in tons per day	Minimum Number Required			
	1-500 tpd	501- 1000 tpd	1001- 1500 tpd	1501- 2500 tpd
Landfill Compactor	1	1	2	2
Grader/ Maintainer	1	1	1	1
Earth Mover	1	2	3	3
Dozer	0	1	1	2
Water Truck	1	1	1	2
Portable Pump	1	1	1	1
Portable Screens	80 feet	100 feet	150 feet	150 feet
Temporary Fencing	150 feet	200 feet	200 feet	200 feet

Equipment will be routinely maintained, promptly repaired, replaced, or supplemented with additional equipment as required for effective operations. Back-up equipment may be rented. There are several heavy equipment rental businesses in the Corpus Christi area. Outside contractors may also be employed to provide equipment, including operators, to assist Gulley-Hurst as required.

Light duty equipment such as pick-up trucks, all terrain vehicles, radio/cell phones, will be employed as necessary for efficient operations.

Equipment shall be secured when not in use to prevent theft or damage to the landfill or facility features.

6.0 PERSONNEL TRAINING (§330.127(4))

Key facility personnel, including at least, the Manager and the Supervisor/Lead Operator will participate in the Municipal Solid Waste Facility Supervisors (MSWFS) licensing program as described in 30 TAC Subchapter F. The licensing program includes requirements for

education, experience, training and examination, provides much of the knowledge to responsibly operate a MSW facility. The Manager will hold a minimum of a Class B license. The Supervisor will hold a minimum of a Class C license and is encouraged to pursue at least Class B licensing. Table 4 in Appendix A presents a detailed listing of the Site Personnel Training requirements.

Training/safety meetings will be conducted at least monthly for all facility personnel. The following is a list of topics that must be included in training at least annually. Meetings should be scheduled to allow personnel to attend while maintaining operating staff levels. Weekly meetings, rotating staff and topics, may be more suitable to balance operating requirements. The content of training, the instructor, the amount of time devoted to each topic, and the identification of each person attending must be documented. Records of all personnel training including types, dates, and certifications will be entered into the Site Operating Record.

The instructor may be the facility manager or professionals qualified in municipal/hazardous waste, firefighting, safety, emergency response, environmental monitoring or engineering, etc., for topics within their specialty. Credentials information for these persons should be kept with the record of training. Commercial training videotapes may also be included in the program.

Training topics should include:

- Procedures for communication in the event of emergency, including: medical, fire, or environmental hazard/release.
- Fire training and procedures, including: fire protection and prevention, use of fire extinguishers, landfill fire fighting, equipment fire fighting.
- Random inspection for exclusion of prohibited waste
- Recognition of prohibited waste and procedures for control and removal of said wastes
- Acceptance and handling of large items, include exclusion of CFC containing equipment and appliances

- Acceptance and management of salvage materials
- Acceptance and disposal of non-RACM materials
- Control of litter and windblown waste pick-up
- Properties and precautions for landfill gas
- Landfill gas and groundwater monitoring system
- Stormwater management and pollution discharge prevention
- Safe operation and control of the working face

An initial training session for all facility personnel will be conducted prior to the start of operation. This training will require a minimum of six (6) hours of instruction covering the subjects listed above, familiarization with documents relevant to each topic, the physical location of facility features. All facility personnel subsequently employed will have similar orientation training over a minimum of four (4) hours. Following the initial training, the monthly training will be attended.

7.0 DETECTION AND PREVENTION OF PROHIBITED WASTES §330.127(5))

Gulley- Hurst will prevent the disposal of prohibited waste through:

- training of personnel (as described in Section 6.0) in the recognition and handling of prohibited waste;
- informing customers of wastes that are prohibited;
- routine screening of incoming loads;
- random inspections of loads; and
- monitoring of loads at the working face and removal of any prohibited waste (as described in Section 10.0)

Section 1.2 of this Site Operating Plan describes the wastes that may be accepted for disposal. The following is a list of some of the prohibited wastes that may be commonly encountered within loads of Type IV waste.

- Putrescible waste, loose or in containers
- Lead acid storage batteries
- Any liquids in open or closed containers.
 - Used motor oil
 - Paint
 - Solvents
 - Chemicals, wet or dry
 - Pesticides/herbicides
 - Cleaning agents
 - Sludges
- Whole used or scrap tires
- Appliances or equipment such as refrigerators, freezers, and air conditioners that contain chlorinated fluorocarbons (CFCs)
- Regulated Asbestos Containing Materials (RACM). Non-RACM may be accepted.

Measures for prevention of prohibited waste disposal

The prevention of unauthorized waste disposal will be achieved through customer notification and through observations and inspections by trained site personnel.

Customers will be notified of wastes that are prohibited through signage. Regular customers will also receive a written notice at least annually listing unauthorized wastes. Irregular customers may be given a list and/or questioned by the gate/scale attendant about their load.

The gate/scale attendant is the initial screener. If the screener detects or suspects that the load contains prohibited waste, the screener has the authority to reject the entire load or to direct the vehicle to a location out of the traffic path for more detailed inspection.

Small quantities of prohibited waste may be segregated and allowed to remain with the vehicle if communication with working face personnel can assure that the waste is not unloaded and the attendant verifies that the waste is with the vehicle when it leaves the site. Alternatively, if the facility maintains a bin for collection of waste of this type, the attendant may allow the waste to be placed in the bin. The requirements for use of a bin are included in Section 10.0. This procedure should help to reduce the amount of roadside dumping from rejected vehicles that would then quickly return absent the prohibited waste.

An equipment operator will observe loads as they arrive and are unloaded at the working face. The equipment operator has the authority to reject all or part of any load received. The procedures to be followed by the equipment operator in handling prohibited wastes are outlined in Section 10.0.

Random inspections will be conducted on a minimum of one percent (1%) of incoming loads. These inspections must include compactor vehicles. The Manager will develop a system for selection to assure that selection is not biased to select a particular vehicle type or owner/operator. The attendant will notify the equipment operator of the load selected, and the operator will direct the vehicle to an area of the working face out of the normal traffic

flow. The operator will visually inspect the contents of the load as it is dumped. Depending on the size and type of materials, the operator may need to use his equipment to break-apart or spread the load to thoroughly inspect the contents. The procedures to be followed by the Equipment Operator in handling prohibited wastes are outlined in Section 10.0.

A Load Inspection Report form will be completed to document the results of each random-load inspection. The report will include the date and time of inspection, the name and address of the hauling company, the drivers name, the size and source of the load, contents of the load, and the description and handling of any prohibited waste found. The majority of the information may be completed by the attendant, however, the operator or other trained individual conducting the inspection must sign the report. Reports will be maintained as a part of the Operating Record.

Any regulated hazardous waste or PCB waste discovered at any time must be isolated and reported to TCEQ-MSW Permits Section, TCEQ Region 14, and to any local pollution agency with jurisdiction that has requested to be notified. A record of all communication shall be placed in the Operating Record.

8.0 FIRE PROTECTION PLAN (§330.129)

No burning of solid waste will be permitted at this site except for events specifically authorized by TCEQ. Accidental fires will be promptly extinguished. In order to minimize any hazards regarding fire, all employees will be instructed in the control of small fires.

Facility personnel will be trained on the fire prevention, protection, and response components of this plan and on firefighting techniques on an annual basis. The training will be conducted by an established professional in-conjunction with facility management personnel. The training will require the facility personnel to identify the category or nature of the different fire sources expected at the facility and instruct the personnel regarding the use of the unique fire fighting techniques and tools for each possible identified fire type. A record of training, including the names of individuals attending and the instructor(s), should be included in the Site Operating Record.

The fire department most likely to respond to a fire at the facility is the City of Corpus Christi Fire Department. As such, the department should be contacted (361-826-3900, Administrative Office) to arrange an orientation to the facility prior to the acceptance of the first waste. The orientation should include site access and the layout of roads, the location of nearby fire hydrants, and other accessible sources of water. This plan should be reviewed with the department personnel at the time as well.

The City of Corpus Christi, Texas enforces the regulations of the "International Fire Code 2003" that was adopted by the City of Corpus Christi on September 3, 2003. The facility will be required to pass the City's Fire Prevention Bureau (FPB) prior to accepting waste. The facility will also be required to meet these codes and to address any issues brought up by the FPB during their annual inspections.

Additionally, personnel will be trained in proper fire-fighting techniques as appropriate to their job function. The landfill employees will be instructed to employ these measures:

- All landfill equipment and vehicles and structures shall be equipped with a fire extinguisher. The size and type of extinguisher required will be as recommended by the equipment manufacturer or the local fire department. Extinguishers will be maintained in fully charged condition at all times. An inspection of all extinguishers shall be performed annually by a qualified inspection service company. Each extinguisher shall carry a current inspection tag. An extinguisher shall be recharged and inspected or replaced after it is used.
- A stockpile of soil for the purpose of smothering a fire will be maintained within the facility boundary as near to the active area as can be reasonably achieved. More than one pile may be used. The stockpile will be loose enough to be quickly loaded but the surface will be shaped and rolled-in to prevent excessive saturation by rain. In-situ soil that requires excavation may not be considered a stockpile. The stockpile will be shaped for loading based on the load/haul equipment that will be used in the event of a fire. A scraper may need a different pile than does a loader/truck combination. The pile will be in an area not subject to flooding or made inaccessible by flood or muddy ground from the working-face. Prevailing wind direction should be

considered in pile location (ie., the pile should be located up-wind so that smoke/fire does not limit access to the pile). The stockpile will include enough soil to cover the working face with a six (6) inch thick layer of soil.

Formulae for the calculation include: 1 acre, 6-inches thick = 807 cubic yards. Or 1,000 square feet, 6-inches thick = 18.5 cubic yards. In any case, a minimum stockpile volume of 250 cubic yards should be maintained at all times.

- A compactor with blade or dozer will be available for use in placing soil to smother or contain any fire that may occur. The loading/hauling and spreading equipment available will be capable of completely covering the waste within one hour of detection of a fire.

The equipment used to deliver soil must be shown through published performance data or field demonstration to be capable of meeting this requirement. The area of exposed waste at the working face will be limited by the capabilities of the equipment. The calculations supporting the combination of stockpile quantity, distance from the working face, equipment capacity and cycle time, and the allowable maximum working face area must be maintained in the Site Operating Record. The calculations will be updated when any of these factors are changed.

- Any vehicle perceived to be carrying a “hot load” indicated by smoke or steam will be directed to a portion of the site away from the working face, fuel supply, structures, or other vehicles where the load can be discharged without danger of spreading a fire. The fire or smoldering items will then be extinguished by handheld fire extinguisher, by smothering with soil, or with water from the water truck or other source depending on the size of the fire and the safest available method.
- If the facility requires the storage of fuel and/or oil for the facility equipment, it will be stored according to the facility’s Spill Prevention Control and Countermeasure Plan. Any fire or smoldering items within the stored materials will be extinguished by

handheld fire extinguisher, by smothering with soil, or with water from the water truck or other source depending on the size of the fire and the safest available method.

- The same procedure will apply to landfill vehicles and equipment or other customer vehicles should fire occur on or in the vehicle. The safety of personnel should be considered first in decision to move or to abandon a vehicle immediately. Abandoned vehicles or equipment may be pushed to a safer area if risk to the pushing equipment and operator is low.
- Smoking is not allowed on the active areas of the landfill.
- Dead trees, brush, or vegetation adjacent to the landfill will be removed immediately, and grass and weeds mowed so that, grass, or brush fires cannot spread to the landfill.
- Landfill equipment will not remain on the active working face of the site overnight.
- Fuel spills will be contained and cleaned up immediately.

In the event that fire is detected in the working face:

- It will be extinguished by smothering with earth;
- Incoming waste will be temporarily suspended or rerouted to another portion of the disposal area and a working face established there until the fire is extinguished;
- Site personnel are to dial 911 to report fires or other emergencies at the site when assistance from off-site sources such as the Fire Department, Police Department, or an ambulance is required. Additional or alternate telephone numbers should be obtained from the fire department if calls to other than 911 are appropriate. The numbers should be posted in the site office.

General Rules for Fires

- Immediately call the Fire Department regardless of the apparent extent of the fire.

- For fires in unknown materials, call the Chemical Transportation Emergency Center, 1-800-424-9300.
- Alert other landfill personnel.
- Assess extent of fire and possibilities for the fire to spread.
- If it appears that the fire can be safely fought with available fire fighting devices until arrival of the Fire Department, attempt to contain or extinguish the fire.
- Upon arrival of the Fire Department personnel, direct them to the fire and render any assistance they may request.
- Do not attempt to fight a fire alone.
- Do not attempt to fight a fire without adequate personal protective equipment.
- Be familiar with the use and limitation of fire fighting equipment.

Any fire related to waste management activities that cannot be extinguished within 10 minutes of discovery must be reported within four (4) hours of discovery to TCEQ Region 14 by telephone (361) 825-3100.

A thorough written report describing the cause, extent, and response action should be submitted to TCEQ Region 14 within fourteen (14) days of discovery of the fire.

Following any fire event, the foregoing prevention and control procedures should be reviewed to whether modifications are warranted.

9.0 ACCESS CONTROL (§330.131)

Primary site-access control will consist of a fence around the entire permitted landfill area and gates at the landfill entrance. Perimeter run-on/off berms and ditches provide additional barriers to vehicular access.

The site access control systems, including all gates, will be inspected at least weekly and a record of the inspections will be placed in the Operating Record. Maintenance will be performed on site security mechanisms (i.e., fences, locking gates) as necessary to maintain access control.

Any breach of an access control component shall be repaired as quickly as possible. Notice will be given to TCEQ Region 14 within 24 hours of discovery of any breach that cannot be permanently repaired within eight hours of discovery. Temporary repairs will be made within 24 hours and permanent repairs will be made within the time frame agreed to when making the notice to TCEQ. Once permanent repair is completed, the TCEQ will be notified. All notices to TCEQ shall be entered in the Operating Record.

10.0 SAFETY/UNLOADING OF WASTES (§330. 133)

The attendants at the site will be instructed in safety procedures related to solid waste disposal. This instruction is included in the requirements for Personnel Training (Section 6.0). A few of the more important general rules are outlined below. These rules, at a minimum, will be posted prominently on the employee bulletin board.

- Personnel will report, to the facility manager, all unsafe equipment or conditions that could possibly cause an accident;
- Personnel will not operate any equipment unless they have been trained on that equipment or have had the correct procedures demonstrated to them by competent personnel;
- Gasoline or other flammable material will not be used as a cleaning agent;
- Personnel must wear all personal safety devices such as hard hats, gloves, safety glasses, and safety shoes required by the facility manager;
- The circumventing of safety devices, such as removing safety belts, operating equipment without fan blade covers, etc., will not be allowed.
- Facility personnel must exercise caution around vehicles and equipment. Be aware of operator's blind spots, the potential for raised trailer or truck beds to become unstable and fall-over, and the possibility that any vehicle or equipment may make unexpected movements.

The smallest practical working face will be maintained during operations. A single unloading area having a maximum extent of 60,000 square feet will be maintained. The area of the

working face is additionally limited by the requirement of the Fire Protection Plan, Section 8.0. Soil cover will be placed any time that the working face will be inactive for more than 24 hours or once per week. The weekly cover will be placed as needed to achieve these requirements, and not left until the end of the operating week.

Unloading of prohibited waste at the Gulley-Hurst Type IV Landfill will not be allowed. Site personnel will take all necessary steps to ensure that any prohibited waste or waste deposited in an unauthorized area is properly disposed or removed from the facility as appropriate for the type of waste. Any waste prohibited from disposal at the site will be removed from the facility and returned to the transporter or generator of the waste as the first choice when the transporter/generator can be identified.

The entrance/scale attendant will be the initial "screener" to assure that putrescible and other unauthorized wastes are not accepted. The attendant will do this by the application of the requirements in 7.0 (Detection and Prevention of Prohibited Waste). To the extent possible, the attendant will visually screen the waste load.

A working-face monitor (typically, the equipment operator) will inspect each load that is dumped. The working-face monitor has the authority to reject loads containing unauthorized materials or have the unauthorized materials removed by the transporter. The monitor may also assess surcharges to have the unauthorized material removed by facility personnel/equipment.

Any prohibited waste that is deposited will be removed from the working face immediately and placed in the offending transporter's vehicle or placed in a collection bin. Putrescible waste placed in a bin (with secure cover) will be removed from the site within three (3) operating days.

The means to manage any materials that cannot be removed immediately by the transporter will be directed by the facility manager or supervisor. Prompt, but proper and safe removal is essential. Depending on the type and quantity of the materials, removal may be done

manually or by use of equipment operating in the vicinity. Additional equipment, such as a back-hoe may be rented and used as required. The offending transporter may be required to supply additional personnel and/or equipment to remove the materials. The specific materials, including the surrounding materials should dictate the appropriate safety considerations. Proper removal and subsequent disposal of hazardous or dangerous materials may include enlisting a qualified contractor to handle removal/disposal.

A Load Inspection Report form will be generated each time prohibited waste is encountered at the working face. The report will include the date and time of inspection or discovery, all determinable information, including: the name and address of the hauling company, the drivers name, the size and source of the load, and the general contents of the load. A description of and prohibited waste handling of the prohibited waste will be included. Reports will be maintained as a part of the Operating Record. Photographs, if available, should be attached to the report.

Any regulated hazardous waste or PCB waste discovered at any time must be isolated and reported to TCEQ-MSW Permits Section, TCEQ Region 14, and to any local pollution agency with jurisdiction that has requested to be notified. A record of all communication shall be placed in the Operating Record.

The written procedures to ensure that containers with any putrescible are not accepted for disposal will be followed and will be available for review by TCEQ personnel. The procedures will be modified as necessary to accomplish their purpose.

Waste in enclosed containers may be received as described below in Section 28.0. Copies of all transporter certifications required in §330.7(c) will be maintained at the landfill and will be available for inspection by TCEQ. The facility will comply with §330.133.g in receiving waste in enclosed containers or vehicles.

11.0 OPERATING HOURS (§330.135)

The site may be open to the public and accept waste-hauling vehicles between the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday. Heavy equipment may be operated at the site between the hours of 6:30 a.m. to 8:00 p.m. Monday through Saturday. The facility

may operate any hours within this range at the discretion of the site management. Hours waste acceptance will be posted at the landfill.

An exception may be made to the stated operating hours on no more than five days in a one-year period to accommodate special occasions, special purpose events, holidays, or special occurrences. Un-schedule hours may be necessary, for instance, when equipment breakdown or rain precludes completion of scheduled weekly waste covering.

The TCEQ Region 14 Office may also approve additional waste acceptance and operating hours to address disaster or emergency situations or other unforeseen circumstances that that could result in disruption of scheduled waste receipts at the facility. A record must be entered into the site operating record any time alternate or additional waste acceptance or operating hours are used.

12.0 SITE SIGNS (§330.137)

A conspicuous sign measuring at least four feet square will be maintained at the site entrance. This sign will state, in letters at least three inches high, the type of site (Type IV), the days and hours of waste acceptance, 24-hour contact phone number(s) for the manager or other person with authority to obligate the facility when the facility is closed, 911 as the phone number for emergency fire/police contact, the facility address, and the TCEQ Permit Number.

An additional sign or signs will be posted stating:

- Vehicles shall prevent loss of waste materials in transit by use of side and tailgates and/or by covering loads with secured tarpaulins or nets.
- No hazardous wastes are accepted at this site.
- No putrescible or household wastes or agricultural fruit and vegetable waste are accepted at this site.
- No smoking or open flames beyond this point.

- Any violation or attempted violation of these requirements may result in a surcharge or penalty or rejection of the load/transporter. A listing of surcharges and penalties may also be posted.

These and any additional signs may be placed at a convenient location between the entrance and the scale so that they may be read without interfering with traffic on the public roadway at the entrance. Lettering will be of a size to be legible to a driver without leaving the vehicle

13.0 CONTROL OF WINDBLOWN MATERIAL (§330.139)

The site will be operated in such a way as to minimize windblown material. The working face will be covered with soil cover weekly or more often as deemed necessary to avoid prolonged exposure of waste. Weather conditions may result in material occasionally being blown away from the working face during waste placement operations. Appropriate means, including, but not limited to, portable fence units or perimeter catch fences will be employed to ensure all windblown materials can be collected and returned to the disposal area. Landfill personnel will collect litter within and around the landfill site daily during site operations or more often as necessary to minimize unhealthy, unsafe, or unsightly conditions. A record of the efforts to collect and/or records of inspection of the surrounding vicinity will be entered into the Site Operating Record.

14.0 EASEMENTS AND BUFFER ZONES (§330.141)

No solid waste unloading, storage, disposal, or processing shall occur within any easement, buffer zone, or right-of-way. There are easements for electricity, telephone, and drainage along the right-of-way (ROW) of County Road 26. An easement for oil/gas exploration has been filed for access to an oil and gas lease on the southeast portion of the facility. There are currently no operations, and given the historical lack of success as described in the Geology Report in Part III, none is expected. Site development has been designed (Part III, Attachments 1 and 6 in particular) so that easements, and utilities are not disturbed. These plans should be closely adhered to. A buffer zone of width greater than 50 feet is

provided between the waste disposal area and the facility boundary. The perimeter roadway that will allow for safe passage of firefighting and emergency vehicles lies within the buffer. Refer to Section 15.0 of this plan for descriptions of the markers used to delineate the easements and buffer zones.

15.0 MARKERS AND BENCHMARKS (§330.143)

The benchmark and all required landfill markers shall be maintained so that they are visible during operation hours. Landfill markers shall be inspected weekly and the record of inspection entered in the Operating Record. Markers that are removed or destroyed shall be replaced within 15 days of the removal or destruction. All markers shall be repainted as necessary to retain visibility.

Landfill markers generally consist of durable steel or wooden posts extending about 6 feet above ground level to clearly identify significant landfill features such as the property boundary and the easements. In the event a marker falls in a roadway, waterway, or other area incapable of sustaining an aboveground marker, the marker may be offset with the offset amount noted on the marker.

All markers shall be color coded as follows:

- **Boundary Markers (Black)** - Site boundary markers shall be placed at each corner of the site and along each boundary line at intervals no greater than 300 feet. Posts that support the perimeter fence will be used for the boundary markers.
- **Buffer Zone Markers (Yellow)** - Markers identifying the buffer zone shall be placed along each buffer zone boundary at all corners and between corners at intervals of 300 feet. Posts that support the perimeter fence will be used for the buffer zone markers. The boundary is greater than 50 feet from the limits of waste placement at all locations.

- Easement and Right of Way Markers (Green) - Easement and right-of-way markers shall be placed along the centerline of an easement and along the boundary of a right-of-way at each corner within the site and at the intersection of the site boundary. If a utility line has been constructed down the centerline, the marker may be offset to avoid hitting the line. This offset will be noted on the marker.
- Landfill Grid System Markers (White) - A landfill grid system shall be installed at the facility. The grid system will encompass at least the area expected to be filled within the next three-year period. Although grid markers shall be maintained during the active life of the site, post-closure maintenance of the grid system is recommended, but not required. The grid system, similar to a typical city map grid, shall consist of lettered markers along two opposite sides, and numbered markers along the other two sides. Markers shall be spaced no greater than 100 feet apart measured along perpendicular lines. Where markers cannot be seen from opposite boundaries or from an active area, intermediate markers shall be installed. The markers will be used for routine record-keeping of operating activities. The letters/numbers on markers will be of sufficient size to serve that purpose. Markers along the boundary may be durable signs securely attached to the perimeter fence mesh. Markers will face the interior of the facility.
- SLER Area Markers (Red) - SLER area markers shall be placed so that all areas for which a SLER has been submitted and approved by TCEQ are readily determinable. The markers are to provide site workers immediate knowledge of the extent of approved disposal areas. These markers shall be located so that they are not destroyed during operations until operations extend into the next SLER. The location of these markers shall be tied into the landfill grid system and shall be reported on each SLER submitted. SLER markers shall not be placed inside the evaluated areas.

- 100-Year Flood Limit Protection Markers (Blue) – The southern boundary of the facility lies along the 100-year flood limit so that markers are not required unless flood limits are revised northward in the future. Should the flood limit be revised in the future, markers in accordance with §330.143 will be required.

A permanent benchmark has been established at the site. The benchmark location and elevation is shown in the Site Layout Plan, Part III, Attachment 1. The benchmark is a bronze medallion set in concrete.

16.0 MATERIALS ALONG THE ROUTE TO THE SITE (§330.145)

Necessary steps will be taken to encourage that vehicles hauling waste to the site utilize a tarpaulin, net, or other means to effectively secure the load in order to prevent the escape of any part of the load by blowing or spilling. These steps shall include the posting of signs at the landfill entrance requiring the loads to be covered, and, as necessary, reporting offenders to the County Sheriff's Office (361) 826-2900, adding litter control surcharges, or other means to encourage compliance. On days when the facility is operating, the landfill entrance at the intersection of County Roads 26 and 37 and other public roads shall be inspected and cleaned at least once per day of spilled and wind blown waste material for a distance of two miles along the route in either direction from the site entrance. A map of the route segments requiring litter control is included as SOP Figure1.

The Manager and/or Supervisor shall consult with officials of the Texas Department of Transportation (TX DOT), the county, and city government with maintenance authority over the roads concerning cleanup of public access roads and right-of-ways. The intentional dumping of materials along the route should be reported to the proper authority for investigation.

Landfill personnel or other persons acting in coordination with the landfill personnel will pick up any litter found along the routes to the site. A vehicle and personnel will be utilized to gather the litter, secure it on the vehicle and transport it back to the landfill for proper disposal. The vehicle will be appropriately marked as a slow moving vehicle making frequent stops, and the personnel will wear reflective safety vests at all times during this

process. Litter control outside the site will be conducted during daylight hours. It shall be the responsibility of the Manager or designated alternate to ensure that litter control outside the site is conducted in a timely manner. The Manager and/or Supervisor or designated alternate shall make arrangements to gather any items that are too large to be picked up by conventional means. The daily inspections will be documented and entered in the Operating Record.

17.0 DISPOSAL OF LARGE ITEMS (§330.147)

Large, heavy, or bulky items, which cannot be incorporated in the regular spreading, compaction, and covering operations, will be recycled or crushed by compacting equipment to prevent bridging and localized subsidence. Large-items that are appropriate for salvage may be placed in a salvage area (See Section 21.0.) A salvage area will house one or more open-top roll-off containers. These containers will be emptied and removed from the site often enough to prevent them from becoming a nuisance. The large item salvage area containers may be used as a citizens' collection and recycling area. The location of these facilities may vary as site development progresses, but will be kept in areas that provide customers with all-weather access to a safe area, segregated from disposal traffic. These containers and the area for storage will be inspected at least weekly to ensure that they have adequate capacity for additional waste and recyclables and the area is kept clean. Large items will be removed within one week of an inspection that indicates the containers are near capacity or the accumulation will pose a nuisance. Gatehouse personnel will route only the appropriate wastes and recyclables to these containers.

Refrigerators, freezers, air conditioners, and any other items containing chlorinated fluorocarbon must be handled in accordance with 40 Code of federal regulations §82.156(f), as amended.

18.0 AIR CRITERIA AND ODOR MANAGEMENT (§330.149)

This site is not located in a non-attainment area. Landfill gas will be controlled as described in the Landfill Gas Management Plan, Attachment 14.

Though the waste types accepted at Type IV landfills are not generally odiferous, any load that is determined to emit strong odor may be rejected by the scale/gate attendant or by personnel at the working face. Any loads deposited that are problematic should be covered as soon as possible. Airborne dust will be controlled by sprinkling/spraying water on roads or other areas causing dust. Dust control efforts should be documented when possible.

Open burning of waste materials is not permitted at the site without specific authorization from TCEQ Region 14 personnel. Additional information on fire control is contained in Section 8.0 above.

In the event objectionable odors are identified at offsite receptors (neighbors or as nuisance to the general public) measures will be taken to control those odors. Methods may include:

- applying deodorizing agent directly to the waste or weekly cover layer;
- placing cover soil more frequently;
- using airborne sprayed, aerosol deodorizing agents;
- adjusting waste placement location or procedure relative to wind direction; and
- adjusting the receipt schedule of objectionable waste loads.

19.0 DISEASE VECTOR CONTROL (§330.151)

The character of waste to be accepted at the Type IV facility is generally not attractive to vectors. Proper compaction of waste and application of weekly cover are appropriate steps to prevent or control vectors. Ponding of water that may be attractive to vectors will be controlled through the procedures outlined in the Pondered Water Prevention Plan, Section 27.0.

Facility personnel will monitor the facility at least monthly for vector control. Facility personnel will take action to eliminate any vector problems that may arise, including employment of a licensed pest control professional if necessary. Pesticides should only be applied by a licensed professional and shall be used in a manner that does not result in the discharge of pollution.

20.0 SITE ACCESS ROADS AND WET-WEATHER OPERATIONS (§330.153)

The site entrance road will be paved to at least the location of the scale. A roadway suitable for wet-weather use will be maintained to the active waste disposal location. Internal roadways will be re-graded at least weekly to minimize depressions, ruts, and potholes in order to provide continuous access to waste disposal areas during dry and wet weather. Documentation of regarding work in the Operation Record is recommended.

Roadways to wet-weather disposal areas will be maintained with an all-weather surface. During periods of extended wet weather or when such conditions are expected Gulley-Hurst will have additional materials delivered and available at the site for all-weather surfacing. Materials will be stockpiled in an area not subject to flooding.

During periods of inclement weather, the facility manager or supervisor will inspect the main access road on a daily basis and, as needed, will clear mud tracked onto the pavement using a motor grader or other suitable equipment. The operator will control dust by sprinkling the roads and ramps with a water truck, unless drought conditions restrict or exempt the facility from watering. The State or County may at times issue restrictions and/or exemptions.

As a routine procedure, a stockpile of cover material will be maintained near the working face. This will provide daily cover on a contingency basis for such conditions as inclement weather, unanticipated downtime of cover hauling equipment, and fire/hot-load control at the working face.

21.0 SALVAGING AND SCAVENGING (§330.155)

Scavenging will not be allowed. Materials for recycle or reuse may be salvaged by the facility or by an authorized contractor. Salvaging will not be allowed to interfere with landfill operations. Salvaged items may be stored in the areas designated at the north side of the facility or at other inactive areas as long as items are removed from the facility often enough to prevent excess accumulation. No accumulation of salvaged materials may cause a discharge of pollution. Public drop-off of recyclable/reusable materials will be accepted in designated areas only. Salvage materials storage areas will be inspected at least weekly.

All inspections and records of materials shipped from the facility will be entered into the Site Operating Record.

22.0 ENDANGERED SPECIES PROTECTION (§330.157)

The Type IV landfill property was surveyed by a qualified biologist for the presence of threatened and endangered species or critical habitat. The results of the survey were communicated to the Texas Parks and Wildlife Department (TPWD). The correspondence along with a Location Restriction Certification is included in permit application Part I/II, General Information.

No threatened/endangered species or critical habitat were found and the facility nor its' operation should result in the destruction or adverse modification of critical habitat of threatened/endangered species or cause the taking of any threatened/endangered species. Should any be encountered during the course of development or operation, the proper authority will be notified.

23.0 LANDFILL GAS CONTROL (§330.159)

Landfill gas monitoring for the presence of methane gas at the site will be conducted on a quarterly basis. In particular, the site boundary will be monitored to identify whether there exists the possibility of off-site methane migration or perimeter methane concentrations exceeding the lower explosive limit. Additionally, on-site structures (an office and any other permanent or portable) will be checked to confirm that methane concentrations do not exceed 25 percent of the lower explosive limit. The allowable limits and details of gas monitoring and recovery are more fully described in the Landfill Gas Management Plan (Gas Plan), Part III, Attachment 14.

All monitoring results and observations will be reviewed promptly to determine if any additional monitoring/actions are required as outlined in the Gas Plan. In the event that methane levels are detected that exceed allowable lower limits, the TCEQ and local officials will be notified and steps will be implemented to ensure the protection of human health. Documentation of the gas measurements and of the steps taken for human protection will be placed in the Operating Record within seven days. A remediation plan for any methane gas releases as described in the Gas Plan will be implemented within 60 days of the

release. This remediation plan will be submitted to TCEQ to describe the proposed remediation activities.

24.0 OIL, GAS, AND WATER WELLS (§330.161)

The landfill property has two known plugged oil/gas wells and no known water wells. The wells are discussed in Part I/II, General Information, and in Attachment 4 of Part III. Any wells discovered will be properly plugged within thirty (30) days and the required records will be submitted to the Texas Water Development Board or Railroad Commission of Texas in the case of gas/oil wells. A copy of all documents will be placed in the Site Operating Record. The Procedures for construction in the vicinity of plugged wells are included in Attachment 10 of Part III. Should a water supply well be needed at the facility, the approval of the TCEQ is required in advance of installation.

25.0 COMPACTION OF WASTE (§330.163)

Waste will be placed only in areas that have been properly lined and approved by the TCEQ. Waste will be spread using a landfill compactor or dozer. The compactor will compact and shape the waste in a working-lift thickness of about four feet, and will track on the material sufficiently to minimize voids and produce a compact mass.

Equipment, other than low ground-pressure equipment, should not be operated directly on the protective cover soil. Other equipment and vehicles must move around on the temporary access roads or placed waste. The first lift of waste will be carefully placed/pushed over the protective cover to prevent any damage to the clay liner below.

26.0 WEEKLY, INTERMEDIATE, AND FINAL COVER (§330.165) AND PERIMETER DRAINAGE SYSTEM

26.1 Weekly Cover (§330.165(b)(g) & (h))

Six inches of soil cover will be placed at least weekly on the top and sides of the working area. Soil cover material will not have been previously mixed with solid waste. The soil will be placed in one lift with a nominal thickness of six inches, and will be compacted sufficiently to minimize infiltration of rainwater, rutting and erosion,

and to prevent the blowing of waste materials and vector problems. The cover should be graded to drain and should have no waste protruding from it.

The smallest practical working face will be maintained during operations. Soil cover will be placed any time that the working face will be inactive for more than 24 hours or once per week. The required cover will be placed as needed to achieve these requirements, and not left until the end of the operating week. The area of the working face is limited by the requirement of the Fire Protection Plan, Section 8.0.

Placement of weekly cover should be documented in the Cover Placement and Inspection Record maintained in the Operating Record. Placement should be recorded for any cover that is placed, but should be verified as complete at least weekly by signature of the facility manager or supervisor. The record should include identification of the area covered, operator, date(s), and equipment I.D. A graphic log on a scaled-plan of the active cell(s) using the site grid system is suggested as a core feature of the record. A GPS system may aid in the collection of location data.

Areas with weekly cover should be inspected following rain events to determine the need for repairs or additions. Any repairs should be documented in the Cover Placement and Inspection Record. Runoff from areas that have intact weekly cover may be discharged to the facility's stormwater management system. Any water that seeps from waste through weekly cover should be treated in accordance with the Contaminated Water Plan, Attachment 15 of Part III.

26.2 Intermediate Cover (§330.165(c),(g), & (h))

All areas that will receive additional waste, but will be inactive for longer than 180 days will be covered with intermediate cover. This cover will be a total of at least 12 inches of earthen material, of which the upper 6-inches must be capable of supporting plant growth. The cover will be seeded or sodded to control erosion. The intermediate cover will be graded to prevent ponding of water. The intermediate cover and temporary stormwater diversion berms can prevent runoff from mixing with waste.

The facility manager or supervisor shall inspect all intermediate cover at least weekly. Additionally, inspections should be performed when: cover is completed on new areas; within 72-hours of a rain event of 0.5 inches or more; areas are disturbed in regarding or shaping; new temporary roadways or haul routes are established over cover; or site personnel report any problems with the cover.

Any needed maintenance and repairs should be made promptly (within 5 days, weather permitting). At a minimum, erosion features with a depth of greater than four inches (measured perpendicular to the surface) will require repair and restoration of the surface.

Placement, inspection, and repairs to intermediate cover should be documented in the Cover Placement and Inspection Record maintained in the Operating Record. The graphic log suggested for weekly cover documentation is appropriate for intermediate cover as well.

26.3 Final Cover (§330.165(f),(g), & (h))-and §330.453)

The final cover system will consist of a minimum 2 feet of soil, 18 inches being compacted clay and the top 6 inches (8 inches on side slopes) being topsoil capable of supporting vegetative growth. This final cover system complies with 30 TAC §330.453.

When a landfill unit is completed to the subgrade elevations for the final contours as shown in Part III, Attachment 7, the area will be prepared for the placement of final cover. Areas with weekly cover will be graded smooth and any protruding objects will be removed. The topsoil component of intermediate cover may be removed and used elsewhere prior to preparation of the base for final cover construction. The final cover will be constructed and certified as set in the Closure Plan, Part III, Attachment 12. In addition to the monitoring and documentation required in Attachment 12, a record of placement, including the date cover was applied, the area covered, and thickness applied that date should be entered in the Operating Record.

The final cover system should be inspected at least weekly and any needed maintenance and repairs should be made promptly (within 5 days, weather permitting). Additionally, inspections and repairs should be performed when vegetation is not yet established on new areas and a rain event of 0.5-inches or more occurs, an area is disturbed in regarding or shaping, or site personnel report any problems with the cover. At a minimum, erosion features with a depth of greater than four inches (measured perpendicular to the surface) will require repair and restoration of the surface.

Placement, inspection, and repairs to final cover should be documented in the Cover Placement and Inspection Record maintained in the Operating Record. The graphic log suggested for weekly and intermediate cover documentation is appropriate for final cover as well. All records must be certified by signature of the facility manager or supervisor.

26.4 Perimeter Drainage System

All run-off control elements, including: perimeter ditches, culverts, the sedimentation basin (particularly, the inlet and outlet features) and the final discharge ditch will be inspected at least weekly and within 72-hours of any rainfall event of 0.5 inch or more. The following elements should be inspected for :

- erosion of grass-lined ditches;
- erosion or disturbance of reinforced ditch liner;
- undermining or erosion at transition of concrete and rip-rap components; including all culvert outlet/inlets;
- debris at basin outlet grate; and
- sediment and general debris removal needs.

A record of all inspections will be entered in the Site Operating record.

27.0 PONDING PREVENTION PLAN (§330.167)

Ponding of water shall be avoided by regular observation and grading of any areas that may pond water in wet weather. The complete area of the facility that has been

disturbed/developed shall be inspected for the potential to pond at least monthly. These areas shall be documented and corrected as soon as practical such that ponding is limited to controlled areas. The inspections and corrective actions taken shall be documented by the facility manager or supervisor and placed in the Operating Record. Inspection of the facility soon after a rain/snow event is particularly helpful. These inspections should also be documented.

The facility will perform additional inspections during and after extended wet weather conditions. These inspections will be to assist in any preventative and/or corrective actions that will be required to correct areas that pond water.

Ponded water over areas containing waste should be removed as soon as practicable and corrective action performed on the areas in question (but within 7 days after each storm event if possible) to prevent infiltration to the waste. Areas may be drained by grading shallow trenches using construction equipment or manually with shovels. Ponded water may also be removed using a portable pump. Water should be removed in a manner that does not lead to erosion or a ponding problem elsewhere. After the area is drained and dried sufficiently, the area, including any damage caused in draining, should be repaired and documented as required in Section 26.0, above. Any water that has come in contact with waste shall be handled in accordance with the Leachate and Contaminated Water Plan, Attachment 15.

Water within below grade portions of a cell that is not yet covered with waste should be removed as the next priority. This water will generally need to be pumped from the cell to the perimeter drainage system. Any areas of protective cover that pond in other than the downgrade location should be filled and regarded as soon as practicable.

Areas of the site not containing waste should be the third priority in ponding prevention. These areas should be graded or filled to control ponding.

28.0 WASTE IN ENCLOSED CONTAINERS (§330.169)

Wastes in enclosed containers or vehicles will not be accepted except for that from generators/transporters meeting the requirements for “permit by rule” in §330.7(c).

Waste may be received from a generator operating a stationary compactor that is used only to compact waste for disposal at the Type IV landfill if the generator complies with all requirements of §330.7(c)(1). A trip ticket (TCEQ Form 20077) must be obtained and placed in the Operating Record for each load accepted. The gate/scale attendant accepting the ticket should verify that the generator’s permit is current based on the expiration date shown on the ticket.

Similarly, waste may be received from transporters who use enclosed containers or vehicles to collect Type IV wastes along collection routes if the transporter complies with all requirements of §330.7(c)(2). A trip ticket (TCEQ Form 20078) must be obtained and placed in the Operating Record for each load accepted. The gate/scale attendant accepting the ticket should verify that the generator’s permit is current based on the expiration date shown on the ticket.

Should the facility wish, in the future, to broaden the authority for acceptance of waste in enclosed containers or vehicles, application will be made to TCEQ in accordance with §330.169(1), (2), & (3).

29.0 DISPOSAL OF SPECIAL WASTES (§330.171)

Special wastes, with the exception of non-regulated asbestos-containing materials (non-RACM), will not be accepted at the facility. The non-RACM materials must be placed on the active working face and covered immediately.

30.0 DISPOSAL OF INDUSTRIAL WASTES (§330.173)

Industrial wastes, with the exception of Class III industrial wastes that do not interfere with facility operation, will not be accepted at the facility.

31.0 VISUAL SCREENING OF DEPOSITED WASTE (§330.175)

Deposited waste will be screened from view of persons on the ground outside the facility to the extent possible. Aerial filling will be screened by maintaining a screening berm (waste covered by weekly or intermediate cover) around the perimeter of the fill area to a height above the general fill. A figure showing screening in conjunction with waste filling and cover sequencing is included in the Site Layout Plan, Attachment 1, to Part III. As aerial filling is completed, vegetated final cover will be placed on the landfill. Plantings of hedges and/or trees around the perimeter of the facility may be used to screen activities from view as well.

32.0 CONTAMINATED WATER MANAGEMENT (§330.177)

The design of the landfill and operations procedures will provide for environmentally safe management of contaminated water. Contaminated water, by definition, is water that has come in contact with waste. Specifics have been incorporated into the Leachate and Contaminated Water Plan, Attachment 15. This plan presents methods to minimize the volume of contaminated water generated and procedures for storage and disposal of the water.

The best management technique for contaminated surface water control is to eliminate its formation. This will be accomplished by controlling the size of the working face, maintaining soil cover over filled areas not actively receiving waste, constructing temporary diversion berms upslope from the active fill area, and applying final cover as final grades are reached.

Any surface water or rainfall that comes in contact with the active face will be collected within containment berms. The contaminated water will be removed and disposed in accordance with the Leachate and Contaminated Water Plan. Contaminated water may be discharged with specific written authorization from the TCEQ Region 14 Office. The authorization will include any testing or documentation required to verify that the water can be safely discharged. Contaminated water may not be recirculated onto the active working face.

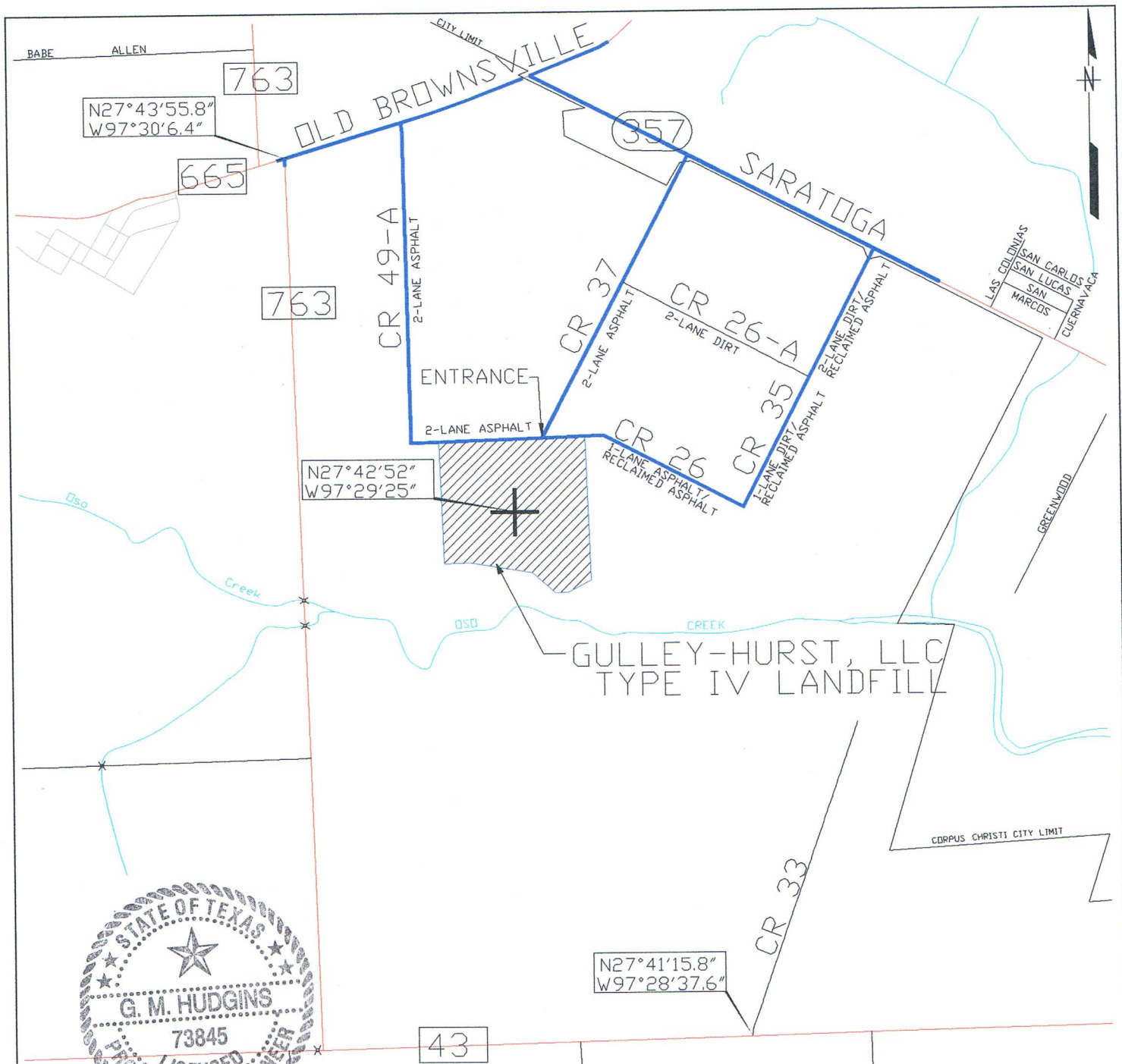
33.0 BIRD CONTROL AND RESPONSE PLAN

Though Type IV wastes are generally not attractive to birds, the landfill manager or supervisor will monitor active areas of the landfill to assure that scavenging bird populations are not increasing and that appropriate control procedures are being followed. Control procedures will include:

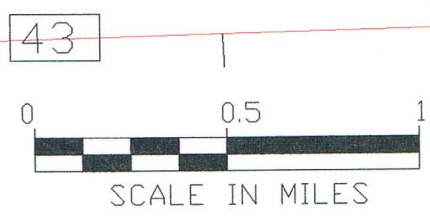
- Placement of weekly cover as approved.
- Special procedures to promptly cover any wastes that are particularly attractive to birds.
- Minimization of water sources through implementation of procedures outlined in Section 27.0 for the prevention of ponded water. The sedimentation pond, which is designed to retain water, is an exception.
- Devices to discourage concentration of scavenging birds such as noise makers, distress calls, predator calls, and visual scare devices such as models or dummies of predators.

In any case, prompt action shall be taken to mitigate any noted increase in scavenging bird populations.

FIGURES



STATE OF TEXAS
 G. M. HUDGINS
 73845
 LICENSED PROFESSIONAL ENGINEER
G. M. Hudgins
 5/18/09



- LEGEND:**
- ROAD SEGMENT REQUIRING LITTER CONTROL
 - INTERSTATE HIGHWAY
 - FARM OR RANCH TO MARKET ROAD
 - STATE HIGHWAY
 - COUNTY ROAD
 - BRIDGE OR CROSSING SEPARATION OVER 20'
 - INTERMITTENT STREAM

BASE MAP SOURCE:
 TxDOT Urban Files - Spring 2003
 Texas Department of Transportation (TxDOT)
 Digital County/Urban Map Files
 County Map No. 178urban
www.tnris.state.tx.us/digital.htm

TEXAS REGISTERED ENGINEERING FIRM F-10265 Modern Technology - Modern Environment 548 Naples St. Corpus Christi, TX 78404	DRAWN BY: GMH APP'D BY: GMH DATE: 3/6/09 SCALE: AS SHOWN	LITTER CONTROL ROUTE MAP GULLEY-HURST, LLC TYPE IV LANDFILL PERMIT NO. MSW 2349 Nueces County, Texas	
	MTME Drawing No: 4106-G17-GLC	Permit Reference: SOP	Figure: SOP-1

Rev: 0

APPENDIX A
to Part IV, Site Operating Plan

TABLE 1
RECORDKEEPING REQUIREMENTS

TABLE 2
INSPECTION AND MAINTENANCE TASKS

TABLE 3
PERSONNEL TYPES AND DESCRIPTIONS

TABLE 4
SITE PERSONNEL TRAINING

TABLE 1
Recordkeeping Requirements

Records Needed	Frequency	Rule Citation
Location Restriction Demonstrations	Included in Permit Application	§330.125(b)(1)
Prohibited Waste Inspection Records, Training and Receipt Notification Procedures	Per Occurrence	§330.125 (b)(2)
Gas Monitoring Results	Quarterly	§330.125 (b)(3)
Remediation Plans for Explosive and Other Gases	Per Occurrence	§330.125 (b)(3)
Unit Design Documentation for Leachate or Gas Condensate Placement	Not applicable for a Type IV Landfill	§330.125 (b)(4)
Groundwater Monitoring and Corrective Action Demonstration, Certification, Monitoring, Testing & Analytical Data	Per Occurrence	§330.125 (b)(5)
Closure and Post-Closure Plans	Included in Permit Application	§330.125 (b)(6)
Post-Closure Monitoring, Testing and Analytical Data	Annual Groundwater Monitoring – Semi-annual Inspections	§330.125 (b)(6)
Cost Estimates and Financial Assurance Documentation for Closure and Post-closure	Annually	§330.125 (b)(7)
Facility Operation, Permit Modification, Approvals, and Technical Assistance Correspondence & Responses	Per Occurrence	§330.125 (b)(9)
Special Waste Manifest, Trip Tickets and All Other Documents Relating to Special Waste	Per Occurrence	§330.125 (b)(10)
Other Documents Specified in the Permit or by the executive director	Per Occurrence	§330.125 (b)(11)
Personnel Training Records §335.586(d)-(e)	Per new person or training event	§330.125 (e)
Personnel Operator Licenses	Per new person or license change	§330.125 (f)
Annual Waste Acceptance Rate Documentation including Quarterly and Annual Solid Waste Summary Reports required by §330. 675	Per Occurrence	§330.125 (h)
Inspections for and Removal of Prohibited Waste	Per Occurrence	§330.127(5)(B)
Alternate Operating Hours	Per Occurrence	§330.135(d)

TABLE 1
Recordkeeping Requirements

Landfill Marker Inspections	Weekly	§330.143(b)
Records Needed	Frequency	Rule Citation
Landfill Gas Management Plan Required Reports and Submittals	Per Occurrence	§330.159
Cover Placement and Inspection Records	Weekly and after rain events	§330.165(h)
Access Control Breach and Repair Notices	Within 24 hours if permanent repair isn't complete within 8 hours	§330.131
Access Control Inspection and Maintenance	Weekly	§330.131
Roadside Litter Pickup	Daily	§330.145
Fire Occurrence Notices	Within 4 hours	§330.129
Windblown Waste and Litter Control Operations	Daily	§330.139
Management and Disposal of Large Items	Weekly or Per Occurrence for offsite shipments	§330.147
Odor Control Efforts	Per Occurrence	§330.149
Dust Nuisance Control Efforts	Per Occurrence	§330.149
Access Roadway Regrading	Per Occurrence	§330.153
Salvaged Material Storage Nuisance Control Efforts	Weekly or Per Occurrence for offsite shipments	§330.155
Vector Control Monitoring	Monthly	§330.151
Ponding Prevention Plan Compliance Documentation	Monthly and after rain events	§330.167
Perimeter Drainage System Inspections	Weekly and after rain events	—

TABLE 2**Site Inspection and Maintenance Tasks**

Item	SOP Section Reference	Frequency	Task	Inspection by:
Fences/Gates	9.0	Weekly	Inspect all fence and gates. Repair as necessary.	Manager or Supervisor
Windblown Waste	13.0	Daily	Collect windblown from all site areas and fencing as well as any that is off-site.	Manager or Designee
Landfill Markers	15.0	Weekly	Inspect for missing or damaged markers. Replace or repair if necessary	Manager or Supervisor
Material Along Route to Site	16.0	Daily	Inspect and collect materials spilled along route for 2 miles from entrance.	Manager or Designee
Disease Vectors	19.0	Monthly	Inspect full site area for rodents or other animals.	Manager or Supervisor
Site Access Roads	20.0	Weekly	Inspect for damage or deterioration.and make repairs. Regrade weekly. Inspect daily during incliment weather.	Manager or Supervisor
Salvage Materials Storage Areas	21.0	Weekly	Inspect to prevent excess accumulation or any that may cause discharge of pollution.	Manager or Supervisor
Landfill Gas	23.0	Quarterly	Monitor perimeter gas probes.	Designated Staff or Consultant
Weekly Cover	26.1	Weekly	Inspect for complete coverage/thickness. Correct as needed.	Manager or Supervisor
Intermediate Cover	26.2	Weekly and with rain event >0.5 inches or disturbance of cover.	Inspect for complete coverage/vegetation, erosion, ponding. Correct as needed	Manager or Supervisor
Final Cover	26.3	Weekly and with rain event >0.5 inches or disturbance of cover.	Inspect for complete coverage/vegetation, erosion, ponding. Correct as needed	Manager or Supervisor
Perimeter Drainage	26.4	Weekly and with rain event >0.5 inches.	Inspect for complete vegetation erosion, erosion, debris, excessive sedimentation. Correct as needed	Manager or Supervisor
Ponded Water	27.0	Monthly	Inspect all areas of site for potential to pond. Correst as needed.	Manager or Supervisor

This table is intended as a checklist or reminder to help assure that important routine tasks outlined in the Site Operating Plan are not overlooked. Each inspection/maintenance event will be documented in the Site Operating Record.

TABLE 3

PERSONNEL TYPES AND DESCRIPTIONS

Title	Minimum Number	Minimum Qualifications	Function
Manager	1	Maintain a Class B License as defined in 30 TAC 30.210	Responsible for: <ul style="list-style-type: none"> • Daily operations, administration of facility's Site Development Plan (SDP) and serving as the emergency coordinator. • Making adequate personnel and equipment available to operate the facility in accordance with the SDP and TCEQ regulations. • Responsible for maintaining the operating record and required logs Contact person for regulatory compliance matters.
Supervisor/ Lead Operator	1	Minimum 1 year landfill operation experience or minimum 2 years experience operating heavy equipment. Training by the Manager in the SOP requirements.	Responsible for: <ul style="list-style-type: none"> • Managing work face and daily fill and cover placement operations • Landfill equipment maintenance and repair • Personnel safety during waste and cover constructions
Attendant	1	Training by general manager in the SOP rules, record keeping requirements, and waste screening training	Levies fees on landfill customers, operates the scale, keeps appropriate records, controls site access, screens for unauthorized waste, and provides general customer directions and information.
Equipment Operator	1	6 months minimum experience in equipment operation or on the job training by supervisor and training by landfill manager in SOP requirements for daily cover and unauthorized waste.	Grading and excavating, necessary equipment maintenance, waste leveling and compaction, application of daily cover, and general site road maintenance. Operators and also responsible for keeping the working face in the smallest area practical and screening for unauthorized waste.
Laborer	As assigned	Internal safety training and personal protective equipment training.	Performs necessary labor (like picking up wind blown litter) as directed

TABLE 4

SITE PERSONNEL TRAINING

<u>Position</u>	<u>Job Description</u>	Site Orientation	Site Operations	Endangered Species	Haz Waste Identificatio	Safety (Job Specific)	Fire Prevention	Load Inspection	Prohibited Wastes	SPCC	Emergency Response	LF License	Equipment Operator License	Litter Control	SWPP
Manager	Responsible for all activities Ensure Adequate Staff	X	X	X	X	X	X	X	X	X	X	B		X	X
Supervisor/ Lead Operator	Manage LF Staff Inspections Waste Operations	X	X	X	X	X	X	X	X	X	X	C		X	X
Attendant	Take Receipts Visual inspection of loads Direct vehicles to unloading areas	X		X	X	X	X	X	X	X	X			X	
Equipment Operator	Compact Waste Detect Prohibited Waste Apply Daily Cover	X		X	X	X							C		
Laborer	As assigned	X		X		X	X				X			X	