RESPONSE 92

| Description of <br> Activity | Task | Frequency | Inspector | Inspection <br> Documentation |
| :--- | :--- | :--- | :--- | :--- |
| Mud and Debris <br> Cleaned from <br> Public Roads | Inspect public roads for <br> evidence of mud and <br> debris tracked from the <br> site. | Daily during <br> periods of <br> inclement weather | LM or <br> Designee | Complete <br> documentation and <br> place in SOR |
| Fire Extinguishers/ <br> Firefighting <br> Equipment | Inspect all fire <br> extinguishers and/or <br> firefighting equipment, <br> promptly repair or replace <br> defective equipment. | Annually | LM or <br> Designee | Properly mark tags on <br> fire extinguishers, <br> document results of <br> equipment <br> inspections, place in <br> SOR |
| Markers and <br> Benchmarks | Inspect markers and <br> benchmarks for damage. <br> Replace markers that are <br> removed or destroyed <br> within 15 days of removal <br> or destruction. | Monthly | LM or <br> Designee | Complete <br> documentation and <br> place in SOR |
| Roadway <br> Regrading | Inspect on-site access <br> roadways to ensure a <br> clean and safe condition. | As needed | Weekly | LM or <br> Designee |
| Site Signs | Inspect all site signs for <br> damage, general location, <br> and accuracy of posted <br> information. | Complete <br> documentation and <br> place in SOR |  |  |
| Ponded Water | Inspect site for potential <br> ponding and ponded <br> water. Fill and grade low <br> areas as soon as practical. | Weekly | Complete <br> documentation and <br> place in SOR |  |

Notes:
SWPPP $=$ Storm Water Pollution Prevention Plan

### 4.1 Personnel Training $\S 330.127(4)$

All landfill personnel will be properly trained to operate the landfill in accordance with this SOP and operational standards required by the permit and the TCEQ MSW regulations based on their specific responsibilities.

Training for personnel will be routine and will be directed by a person trained in waste management procedures. Facility personnel will be instructed in the required waste management procedures and contingency plan implementation relevant to the positions in which they are employed. At a minimum, the training program will ensure that facility personnel are trained for their specific responsibilities to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

- Procedures for notifying appropriate personnel in the event of an emergency
- Training in use of facility emergency response and monitoring equipment
- Training in use of facility communications or alarm systems
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- Training in response to fires or explosions, hot loads, hazardous weather conditions, etc.

Training in procedures to shutdown operations
New employees will receive a comprehensive overview of landfill operations and specific training commensurate with their position, focusing on information that is necessary to protect the health and welfare of the new employee and enable them to perform their duties in accordance with this SOP, the operational standards required by the permit, and the TCEQ MSW regulations

Following the initial training, the additional employee training will continue in the form of periodic on-the-job training. Training meetings will be scheduled and conducted for employees approximately monthly. Topics for training may vary depending on job requirements.

The LM, equipment operators, gate attendants, and laborers are trained in the contents of this SOP and other topics, as described in the following table:

| Position | Job Description |  |  |  |  |  |  |  |  |  |  | $\begin{aligned} & \text { す } \\ & \text { 号 } \end{aligned}$ |  | $\begin{aligned} & \text { n } \\ & \frac{1}{2} \\ & \frac{1}{0} \end{aligned}$ |  |
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| Landfill <br> Manager | Responsible for all activities including staffing, inspections, operations, etc. | X | X | X | X | X | X | X | X | X | X | $x$ | X | X | X |
| Gate <br> Attendant | Take receipts, screen customers, schedule random load inspection, and direct vehicles to unloading area | X |  |  |  | X | X | X | X |  | X |  | X |  |  |
| Equipment Operator | Push and compact waste, observe dumping of loads for unauthorized waste identification and apply daily cover | X |  | X | X | X | X | X | X | X | X |  | X |  |  |
| Laborer | As assigned | X |  | X |  | X | X |  |  |  | X | X |  |  |  |

Notes:
SPCC = Spill Prevention, Control, and Countermeasure SWPPP = Stormwater Pollution Prevention Plan

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

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

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

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

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

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

