Attachment B

Procedures to Prevent Hazards

TABLE OF CONTENTS

1	Procedures to Prevent Hazards	B-1
1.1	Security Procedures to Prevent Hazards	B-1
1.1.1	Barrier and Means to Control Entrance	B-1
1.1.2	Warning Signs	B-2
1.2	Inspection Procedures	B-2
1.2.1	General Inspection Procedures	B-2
1.2.1.a	Inspection Checklist	B-2
1.2.1.b	Remedial Action	B-3
1.2.2	Landfill Inspection Procedures	B-3
1.2.3	Tank Inspection Procedures	B-4
1.2.4	Security Equipment Inspection Procedures	B-5
1.2.5	Safety and Emergency Response Equipment Inspection Procedures	B-5
1.2.6	Loading and Unloading Area Inspection Procedures	В-е
1.3	Preparedness and Prevention Procedures	В-е
1.3.1	Internal Communications	В-е
1.3.2	External Communications	B-6
1.3.3	Emergency Equipment	B-7
1.3.4	Water for Fire Control	B-7
1.3.5	Arrangements with Local Authorities	B-7
1.4	Preventive Procedures, Structures, and Equipment	B-7
1.4.1	Loading, Unloading, and Waste Transfer Operations	B-8
1.4.2	Runoff and Run-On	B-8
1.4.3	Wind Dispersal Control System	B-9
1.4.4	Water ProtectionB-Error! Bookmark n	ot defined
1.4.5	Mitigation of Effects of Equipment Failure and Power Outages	B-9
1.4.6	Prevention of Undue Exposure of Personnel to Hazardous Waste	B-10
1.4.7	Special Requirements for Bulk and Containerized Liquids Disposed of in Landfills	B-10
1.4.8	Special Requirements to Limit Releases to the Atmosphere	B-11
1.5	Precautions to Prevent Ignition or Reaction of Ignitable, Reactive, or Incompatible Wastes	B-11
1.5.1	General Requirements	B-12

1.5.2	Requirements for the Landfill	. B-12
1.5.3	Incompatible Waste Handling	. B-12
TABLES		
Table B-1.	Triassic Park Waste Disposal Facility Inspection Schedule	B-13

Permit Attachment B Procedures to Prevent Hazards

1 PROCEDURES TO PREVENT HAZARDS

This section provides information on the prevention of hazards to both the public and the environment upon construction and operation of the landfill. Specific procedures for implementing the safeguards will be developed during the construction phase of the project and prior to Facility operations.

The engineered barriers for the mitigation of hazards discussed in this section are shown in design drawings contained in Permit Attachment L1.

1.1 Security Procedures to Prevent Hazards

Security at the Facility will be provided by security guards, fences surrounding the Facility and warning signs as described in the following sections.

1.1.1 Barrier and Means to Control Entrance

The Facility will be bounded by a barbed-wire fence. The active portion of the Facility (i.e., the processing area) will be bounded by a six-feet high chain link fence topped with barbed wire with two access gates located in the northern portion of the Facility. The northwest gate will remain locked at all times and will serve as a secondary or emergency entrance/exit. Access into the Facility will be controlled by means of the primary gate, located in the northeast corner of the Facility. The gate will be fitted with a cattle guard to prevent livestock from entering the Facility. A security guard post will be located at this entrance gate and will be attended 24 hours a day. The fence, gates, and guard will provide adequate access control to prevent unwitting entry of persons or livestock to the active portion of the Facility.

Visitors will be required to sign a visitors log prior to movement into or within the Facility. Each visitor will be issued a security badge, which will be worn while the visitor is onsite. The badge will be worn on the visitor's outermost garment in a clearly visible location above the waist. The security guard is be responsible for ensuring that all visitors comply with these requirements. Visitors will be escorted unless other arrangements are made with Facility personnel. Visitors also will be required to sign out upon exiting the Facility.

1.1.2 Warning Signs

Warning signs stating "Danger - Unauthorized Personnel Keep Out" will be posted at the site entrance and every 50 feet along the perimeter fence. The signs will be posted in English and Spanish and will be legible from a distance of at least 25 feet.

1.2 Inspection Procedures

This section of the permit application provides written inspection guidelines and an inspection schedule for the Facility in accordance with 20.4.1. NMAC.

1.2.1 General Inspection Procedures

Facility personnel will conduct inspections of all equipment and structures routinely and as frequently as necessary to prevent, detect, or respond to environmental or human health hazards. Inspection records describing malfunctions, deteriorations, operator errors, and discharges that may cause or contribute to a release of hazardous waste constituents to the environment or that may be a threat to human health will be kept at the Facility administration building for a minimum of three years after the completion of closure. Specific inspection procedures are outlined in Sections 1.2.2 through 1.2.6.

Personnel will receive training regarding hazardous waste inspections as part of the Facility hazardous waste training program. Personnel responsible for inspecting particular equipment or areas of the Facility will receive specific classroom and/or on-the-job training in inspection procedures. Inspection procedures will be described in the operating manual, which will be located in the Emergency Coordinator's (EC's) office.

Facility guards will make rounds of the Facility at least once daily to identify any unauthorized entry to the Facility or any other abnormalities. The guards will not use inspection checklists, but will notify the EC and/or emergency response personnel of any spills or other emergencies. Requirements for the EC and/or emergency response personnel, subsequent to an inspection notification, are outlined in the Contingency Plan in Permit Attachment C.

1.2.1.a Inspection Checklist

Inspection checklists and an inspection schedule have been developed to ensure that inspections occur in accordance with the inspection schedule matrix provided in Table B-1. This matrix will be updated and expanded, as necessary, to reflect changes of, or additions to, equipment or changes in construction or operations that modify inspection procedures or frequencies. All changes to the inspection procedures shall be submitted to the NMED in accordance with 40 CFR 270.42.

Inspection frequencies will vary according to the type and age of the equipment, the frequency of its use, and its importance in preventing environmental incidents. The

inspection frequencies provided in Table B-1 show that inspections will occur frequently so that problems can be identified in time to correct them before conditions pose a threat to human health or the environment.

The inspection checklists will identify the name of the inspector, date and time of the inspection, frequency of inspection, specific items to be checked, any notations or observations of abnormalities, and the nature and date of any corrective actions taken. Checklists are provided in Permit Attachment D1. The inspection schedules will be kept in the Operating Record and the EC's office.

When new or modified equipment is installed or used at the Facility, the inspection procedures, forms, and schedule will be revised to reflect these changes and submitted to NMED in accordance with 40 CFR 270.42.

1.2.1.b Remedial Action

Facility personnel or contract personnel shall, as soon as practicable, remedy any deterioration or malfunction of equipment or structures encountered during inspections. The remedy shall be completed in sufficient time to ensure that the problem does not result in an environmental or human health hazard. Spills shall be addressed in accordance with Permit Section 2.11.9.

All repairs to permitted portions of the Facility will be made in accordance with the original construction specifications and Construction Quality Assurance (CQA) plan.

If a hazardous or potentially hazardous condition is identified, the EC, as specified in the Contingency Plan (Permit Attachment C), will be notified immediately to assess the situation and determine adequate procedures to correct the situation and whether the Contingency Plan should be implemented.

1.2.2 Landfill Inspection Procedures

The landfill liners and cover will be inspected during and immediately after installation in accordance with the CQA Plan, which is discussed in Section 2.5.2.3 of the Part B Permit Application.

The landfill and associated equipment will be inspected weekly and after storms as specified. Records of the inspections will be maintained in the operating record, which will be kept in the administration building.

If deterioration or any other abnormalities are noted during inspection of the landfill or associated components, the EC will be notified and will determine the appropriate course of action for correction in accordance with Section 1.2.1.b above.

The landfill will be inspected by properly-trained personnel weekly and after storms for such items as spills, leaks, odors, wind-blown particulate matter, any evidence of

deterioration of the landfill itself, and any malfunction or improper operation of the run-on/runoff control systems. All inspections will be documented on the landfill inspection checklist, described in Section 1.2.1.a and found in Permit Attachment D1. Inspection checklists will be kept in the Operating Record until after completion of closure and in accordance with 40 CFR § 264.15(d).

During the active life and during closure of the landfill, the leachate collection and removal system (LCRS) and leak detection and removal system (LDRS) will be checked daily for the presence of liquid. The amount of liquid in the system may be used to determine if the system is functioning properly. The system will either be inspected through the cleanout pipe, which is connected to the primary collection pipe and the sump riser pipe, or with liquid detection devices, if they are installed. The leachate collection tank will be inspected in accordance with the procedures outlined in Section 1.2.3.

During the operational phase of the landfill, periodic checks will be made within the landfill to detect the presence of hazardous gases and volatile organics. Surveys of the active landfill surface area and the riser pipes with an organic vapor meter (OVM) or comparable device will be performed quarterly to evaluate for the presence of organic compounds.

The active portion of the landfill shall either be covered with soil or managed to control dust and other particulate dispersal (see Section 2.5.1.7 of the Part B Permit Application). Adding water to prevent wind erosion will be limited so that ponding in the landfill does not occur.

The stormwater collection basin within the Phase 1A landfill and associated with the runoff/run-on control systems will be inspected following each storm event to check whether water has accumulated. The collection basin will be emptied as quickly as possible to ensure that the design capacity of the system is not exceeded. Details of the landfill stormwater control system are included in the Engineering Report (Permit Attachment L).

1.2.3 Tank Inspection Procedures

Leachate collection tanks will be used to store leachate recovered from the sumps. While storing leachate, tanks will be inspected daily for spills, discharges, or leaks around the tanks, and to verify that liquid levels are below the maximum capacity for the tank. The inspection will focus on (1) overfill control, (2) equipment condition to detect any signs of corrosion or releases of waste from the tanks or ancillary equipment, (3) data gathered from monitoring and leak detection equipment to ensure that the tank system is being operated in accordance with design specifications, and (4) the cathodic protection systems, as installed.

The secondary containment for the tanks will also be inspected for the presence of any liquids. These inspections will focus on the condition of the containment surface to ensure that it is free of cracks or gaps and is sufficiently impermeable to contain leaks, spills, or accumulated liquids until the collected material is detected and removed. Inspection records will be maintained in the Facility operating record, which will be kept in the administration building.

1.2.4 Security Equipment Inspection Procedures

Security inspections will be conducted daily and will include the following elements:

- i. visual inspection of the warning signs at all approaches to the Facility to ensure that the signs are present, legible, and securely attached to the fence;
- ii. inspection of the Facility perimeter to ensure the integrity of the fence and gate by looking for signs of erosion of soil at the fence posts and corrosion or vandalism to the fence, fence posts, or locks;
- iii. inspection and replacement, as necessary, of lights for the purpose of illuminating the Facility at night;
- iv. inspection of structures for signs of erosion, tampering, or vandalism; and
- v. records of the inspections will be maintained in the administration building.

1.2.5 Safety and Emergency Response Equipment Inspection Procedures

Safety and emergency response equipment inspections will be conducted monthly. This category of equipment includes first aid supplies; respiratory protection equipment (other than personally issued respirators); protective clothing, including hard hats, gloves, and suits; fire extinguishers; eye wash stations; safety showers; empty 55-gallon drums; shovels; and spill cleanup and decontamination kits.

A monthly inventory of safety-related supplies and equipment shall be performed to ensure that the items are available, in good condition, and at designated locations. Inadequate or missing items shall be replaced or repaired.

Fire protection equipment, including fire extinguishers and fire hoses, shall be inspected monthly and after each use to ensure that the equipment is capable of functioning properly and that access to the equipment is not blocked. Each fire extinguisher shall be inspected to ensure that the seal around the handle is intact, that the pressure gauge indicates that the unit is adequately charged, and that an Underwriter's Laboratory listing label is attached to each unit. Building sprinkler systems shall be inspected according to manufacturer specifications. Chemical fire-suppression systems shall be checked to ensure that adequate quantities of the chemical and water exist. The fire-suppression

vehicles shall also be tuned up at least annually and inspected monthly. Records of inspections will be maintained in the administration building for each unit.

The public address (PA) system shall be tested daily to ensure proper operation. Handheld radios shall be tested prior to use each day and periodically throughout the day. The units shall be recharged after each shift to ensure that they are operating properly.

1.2.6 Loading and Unloading Area Inspection Procedures

Waste loading and unloading areas will be inspected daily when in use. The inspections will focus on safety-related issues that could lead to hazards or waste spills. Signs shall be located at each loading and unloading area indicating that equipment or materials should not be left unattended as they could be obstructions for the loading and unloading operations.

Onsite roadways and vehicle traffic areas will be inspected on a preventive maintenance order (PMO) schedule to ensure that potential safety hazards, such as road surface deterioration, are minimized or avoided. Records of inspections shall be maintained in the Facility operating record.

1.3 Preparedness and Prevention Procedures

Preparedness and prevention encompass a wide range of procedures, from communication to equipment to arrangements with local authorities. These procedures are discussed in the following sections. The results of all testing shall be documented and maintained in the Facility operating record.

1.3.1 Internal Communications

Internal communication will be established to meet the needs for each building and area at the Facility. Three forms of internal communication systems will be implemented; (1) a PA system will be used in the main buildings to alert employees of potential or actual emergencies; (2) hand-held two-way radios shall be provided to all employees for use to communicate emergencies; (3) an audible fire alarm will be located in all permanent buildings. The alarm will be used to alert employees of fires but may also be used for alerting them to other emergencies in the event that the two other systems described above are malfunctioning. Equipment tests shall be conducted monthly to assure that internal communication systems are functioning properly according to manufacturer's specifications.

1.3.2 External Communications

A telephone will be available for operations that occur inside the main buildings. For outdoor processing areas without a telephone nearby, hand-held two-way radios capable

of summoning emergency assistance from local police departments, fire departments, and state or local emergency response teams shall be available.

A map identifying the location of telephones at the Facility will be provided to the NMED prior to acceptance of waste at the Facility.

1.3.3 Emergency Equipment

Emergency response equipment at the Facility includes fire extinguishers and other fire control equipment, spill cleanup kits, and decontamination kits. A detailed description of this equipment, including the content and type, is included in Attachment C1 and is discussed in the Contingency Plan (Permit Attachment C).

A complete list of the contents and location of the various types of kits shall be maintained in the EC's office at the Facility.

1.3.4 Water for Fire Control

Permanent buildings at the Facility shall be equipped with automatic sprinkler systems and fire extinguishers, as required by the National Fire Protection Association (NFPA) code. The sprinkler systems shall be designed according to NFPA guidelines. Water storage to fight fires outside of buildings and the landfill shall meet minimum requirements of the New Mexico State Fire Marshal's Office and be transported by water truck(s). It is expected that landfill fires, in the unlikely event that they occur, will be extinguished with a dirt cover. A ready supply of dirt will be available at the excavation stockpile and landfill and general facility equipment (dozers, loaders and scrapers) will be available to load, haul and place dirt.

1.3.5 Arrangements with Local Authorities

The Facility shall make arrangements with local authorities as described in the Contingency Plan (see Permit Attachment C).

1.4 Preventive Procedures, Structures, and Equipment

To prevent accidents at the Facility, all individuals responsible for material and waste handling shall receive classroom and on-the-job instruction in safety awareness, recognition of potential hazards in the work place, environmental procedures and policies, and fire prevention and control procedures. Individuals who may come in contact with hazardous waste shall receive Occupational Safety and Health Administration (OSHA) 40-hour training and annual 8-hour refresher courses. These individuals also shall be trained in the operation of the equipment and vehicles that they will be using to perform their duties.

Safety meetings will be conducted as necessary to discuss safety issues, fire prevention and control, good housekeeping and any problems relating to specific areas of the site.

1.4.1 Loading, Unloading, and Waste Transfer Operations

To prevent accidents during loading, unloading, and waste transfer, hazardous waste shall be handled only by those individuals who have been properly trained in correct handling procedures and proper spill response procedures. Inspection of loading and unloading areas is discussed in Section 1.2.6.

Facility controls will be used to protect waste haulers while on-site. Landfill staff shall direct all truck traffic on-site, including riding with drivers, if needed. At the base of the landfill cell, a designated, compacted, flat unloading area will be used that will be completely separate from waste disposal areas. Trucks shall not come into contact with placed hazardous waste, daily cover, or sprayed and recirculated leachate. The emergency brakes of all transport vehicles shall be engaged and the wheels chocked during all loading and unloading operations.

The Facility will make available, to hazardous waste haulers, documentation regarding site-specific hazards, including posted speed limits, traffic control patterns, and facility signage. While on-site, waste haulers shall be required to participate in the Facility's health and safety plan, which includes site-specific training for drivers. Hazardous waste haulers are also required by federal law to participate in their company's own health and safety plans, including HAZWOPER training and knowledge of waste materials being hauled.

Wastes shall be transferred in approved vehicles over approved routes and the maximum capacity of the truck shall not be exceeded. Waste containers shall always remain closed, except when it is necessary to add or remove waste (e.g., for sampling). This practice will minimize the potential for accidental releases of waste.

If ignitable wastes are handled, special precautions shall be instituted, including the use of special non-sparking bung wrenches or other tools for opening drums or otherwise handling the waste containers, grounding waste containers during waste transfer, and other special handling requirements. These precautions, coupled with the procedures for management of ignitable waste contained in Section 2 of the Part B Permit Application, will minimize the hazards associated with ignitable wastes.

1.4.2 Runoff and Run-On

The landfill run-on control system shall be capable of preventing flow onto the active portion of the landfill during peak discharge from at least a 24-hour, 25-year storm. The run-on control system will consist of unlined ditches for diverting run-on from off-site

around the landfill. Water from outside the landfill will be prevented from entering the active portion of the landfill by the waste processing corridor drainage ditch.

The runoff management system shall be capable of collecting the water volume resulting from at least a 24-hour, 25-year storm. Runoff in the active portion of the landfill will be collected in the lined stormwater collection basin within the landfill and the LCRS. The run-on and runoff control system for the landfill is described in greater detail in Section 2.5.1.6 of the Part B Permit Application.

Inspection of the runoff and run-on ditches shall be made during weekly site inspections and after storms. Maintenance and repair of the ditches will be performed as necessary and in accordance with the Operations and Maintenance Manual (Permit Attachment N) and the Design Drawings (Permit Attachment L1).

1.4.3 Wind Dispersal Control System

The active portion of the landfill shall either be covered or managed to control the wind dispersal. In general, dust control will be accomplished by spraying water on the active portion of the landfill and any road or area subject to wind dispersal. Adding water to prevent wind erosion shall be limited so that ponding in the landfill does not occur. If leachate is used for wind dispersal control, daily soil cover shall be placed on areas where leachate has been applied. Leachate application for wind dispersal will only occur within lined landfill areas, and will only occur in the direction of lined landfill areas. Leachate shall not be used for wind dispersal control if wind speeds exceed 15 mph. Additional detail about wind dispersal procedures can be found in Section 2.5.1.7 of the Part B Permit Application.

1.4.4 Mitigation of Effects of Equipment Failure and Power Outages

The Facility shall use a Preventive Maintenance Order (PMO) schedule, based on manufacturer's recommendations for various pieces of equipment, to ensure proper operation of the equipment. In addition to the items replaced or changed as part of the PMO schedule, any item(s) found to be deficient during the PMO inspection will be replaced or repaired as soon as possible.

Spare parts critical to ensuring continuation of equipment and safety systems may be stored onsite to facilitate immediate repairs. Other items that require long ordering periods also may be stored onsite.

In the event of a power failure backup generators shall be available for emergency backup power. The generators shall be started within 30 minutes of a power failure.

On-the-job training shall provide personnel with appropriate instruction in emergency response procedures so that proper actions will be taken in the event of equipment or power failure.

The emergency power system is described in Section 1.3.5.c of the Contingency Plan (Permit Attachment C).

1.4.5 Prevention of Undue Exposure of Personnel to Hazardous Waste

All employees shall be trained in the safe operating practices to be used in handling hazardous wastes. All employees shall wear steel-toed shoes and safety glasses while in processing or active areas of the landfill. In some cases, additional personal protective equipment (PPE) will be required, such as hearing protection, respiratory protection, and protective clothing. Employees shall be trained in, and responsible for, proper inspection and use of their respirator and proper use and care of PPE. If a defect is noted in any of the equipment, the equipment shall be replaced or repaired it prior to use, in accordance with the applicable training. PPE, other than respiratory protection, shall be located at or near each permitted unit, along with spill response equipment.

Routine tasks will require some PPE, as outlined in the site Health and Safety Plan (HASP). In many cases, these requirements shall include safety glasses, steel-toed shoes, and hard hats. The site HASP plan shall be prepared prior to commencement of hazardous waste operations. This plan shall be kept at the Facility, but is not considered part of this permit.

Out-of-the-ordinary hazardous waste activities shall be evaluated by the site Health and Safety Officer (HSO) or a member of an emergency response team prior to responding to the incident. After the type of contaminants present has been determined, the HSO or the EC shall specify the respiratory protection and/or PPE requirements necessary to safely handle the incident. All respiratory protection devices shall be maintained in compliance with OSHA requirements and shall be issued only to qualified personnel who have received medical approval and training for the proper use of respiratory protection devices.

For emergencies that are beyond the scope of the Facility personnel training program, areas of the Facility or the entire Facility may be evacuated, at the direction of the EC. In such cases, professional emergency response personnel will be notified to respond to the emergency (Permit Attachment C).

1.4.6 Special Requirements for Bulk and Containerized Liquids Disposed of in Landfills

Bulk or non-containerized liquids shall not be disposed of in the landfill. Containers holding free liquids will be placed in the landfill only if (1) all free-standing liquid has been removed by decanting or other methods, mixed with a compatible, non-biodegradable sorbent, solidified so that free-standing liquid is no longer observed, or otherwise eliminated; (2) the container is very small (i.e., less than 40 milliliters); (3) the

container is designed to hold free liquids for use other than storage (e.g., a battery); or (4) the container is a lab pack disposed in accordance with 40 CFR § 264.316.

In the case of number (1) above, prior to placement in the landfill, the absence of free liquids shall be verified using a paint filter test using EPA Method 9095B or equivalent. In addition, this waste will be analyzed for other parameters based upon the characterization of the waste before solidification. These requirements are a part of the Waste Analysis Plan (Permit Attachment F).

1.4.7 Special Requirements to Limit Releases to the Atmosphere

Operations at the Facility will be conducted to minimize the potential for releases to the atmosphere as required by 40 CFR § 270.14(b)(8)(vi). This objective shall be achieved by using a wind dispersal control system to limit or eliminate the dispersal of particulate matter from the landfill, roadways, and other areas of the Facility and by providing control equipment for operations that may produce air emission, if necessary. The dispersal of particulate matter from soil surfaces will be reduced by restricting traffic and applying small amounts of water spray to moisten the soil surface. Procedures will be developed to ensure that the landfill and associated activities are managed to prevent particulate releases. The procedures will be provided to the NMED no less than 30 days prior accepting waste at the Facility. The Contingency Plan (Permit Attachment C) will specify the methods to prevent and control spills and emissions related to spills.

1.5 Precautions to Prevent Ignition or Reaction of Ignitable, Reactive, or Incompatible Wastes

Hazardous wastes shall be handled only by properly trained Facility personnel. The Facility training program is outlined in Section 7 of the Part B of Permit Application. Individuals shall be instructed in identifying, , properly labeling, and properly handling incompatible wastes. Proper handling includes segregation, avoidance of mixing the wastes, and carefully checking compatibility codes prior to the disposal of any wastes. Personnel also shall be specifically trained in the proper handling of ignitable and reactive wastes.

The training is designed to ensure the proper handling of ignitable and reactive waste and prevent mixing of incompatible waste. In addition, personnel training and Facility operational procedures shall be developed to (1) ensure that wastes are properly identified; (2) ensure that general Facility requirements for the management of ignitable, reactive, and incompatible wastes are adequate; and (3) ensure that requirements for the management of these wastes are compatible with operations. The procedures for identifying these wastes are provided in Section 1.5 of the Waste Analysis Plan (Permit Attachment F).

The Permittee shall request that local fire department or other qualified organization inspect the permitted unit on an annual basis to assure continued compliance with all applicable NFPA codes.

Ignitable and reactive waste handling procedures are generally described in Section 1.5.1. More specific requirements for the landfill are described in Section 1.5.2. Handling of incompatible waste is described in Section 1.5.3.

1.5.1 General Requirements

Precautions shall be taken to avoid (1) accidental ignition or reaction of ignitable or reactive wastes; (2) reactions that generate extreme heat or pressure, fire or explosions, or violent reactions; (3) reactions that produce uncontrolled toxic or flammable fumes, dusts or gases, in quantities large enough to threaten human health and the environment; and (4) any other reactions that threaten human health or the environment.

Ignitable or reactive wastes accepted at the Facility shall be separated and protected from any sources of ignition or reaction, including open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks, spontaneous ignition, and radiant heat. All smoking will be confined to specifically designated areas. "No Smoking" signs will be conspicuously posted wherever there is a hazard from ignitable or reactive waste. Ignitable or reactive wastes shall be located in the active portion of the Facility and not less than 50 feet from the Facility property line.

1.5.2 Requirements for the Landfill

Ignitable or reactive wastes shall not be placed in the landfill unless the waste has been treated and no longer meets the definition of ignitable or reactive waste under 40 CFR §§ 261.21 or 261.23. Additional information for the management of these wastes in the landfill is contained in Section 2.5.3.6 of the Part B of the Permit Application.

1.5.3 Incompatible Waste Handling

Generator waste profile forms (see Permit Attachment F2) shall provide Facility waste handlers with the necessary information to avoid mixing containers of incompatible wastes. Facility employees shall be trained to recognize incompatible wastes and to prevent the mixing of such wastes. Incompatible wastes shall not be placed in the same area of the landfill, but separated adequately to avoid all possibility of commingling in the landfill.

Prior to acceptance at the facility, wastes will be solidified and stabilized prior to their placement into the landfill. These processes are performed to bind liquids and prevent leaching of the waste constituents. Therefore, any leachate generated within the landfill is not expected to contain levels of hazardous constituents that would cause the leachate

to be a characteristic hazardous waste. Due to the anticipated low concentrations of hazardous constituents in the leachate and the geographic separation of incompatible waste types, incompatibility problems within the landfill should be negligible.

Table B-1. Triassic Park Waste Disposal Facility Inspection Schedule

Inspection Item - Problem or Problem Area	Inspection Time	
General Facility		
Security equipment – signs, perimeter fences, lights	Daily	
Stormwater detention basin – liner	Weekly and after storms	
Surface water diversion ditches to stormwater detention basin	Weekly and after storms	
<u>Landfill</u>		
Liner and cover systems - uniformity, damage and imperfections	During construction and installation	
Liners and cover deterioration and malfunction	During and immediately after construction	
Spills, leaks, odors, windblown particulate	Weekly and after storms	
Run-on/runoff control system - uniformity, damage and imperfections	Weekly and after storms	
LCRS/LDRS presence of liquid and volume of liquid pumped	Daily and after storms	
Leachate collection tank (while holding waste) for condition and proper function	Daily	
Hazardous and organic gases	Quarterly	
Ancillary equipment	Manufacturer recommended	
Sump pumping and instrumentation	Annually	