

Attachment N

Operations and Maintenance Plan

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Attachment N. Operations and Maintenance Plan

1 GENERAL

The Triassic Park Hazardous Waste Disposal Facility is a Resource Conservation and Recovery Act (RCRA) Subtitle C waste disposal operation. Support units and structures include a chemical laboratory, administration building, weigh scale area, maintenance shop, clay processing area, clay liner material stockpiles, daily cover stockpiles, storm water detention basin, storm water diversion ditches, perimeter vadose zone monitoring wells, and access roads.

This Operations and Maintenance Plan refers to the landfill and the site runoff and drainage control system.

1.1 Land Disposal

The landfill only accept hazardous waste that meets the LDR standards specified in 40 CFR 268..

2 DESCRIPTION OF UNITS AND DRAINAGE SYSTEM

2.1 Landfill

Phase 1A of the landfill will be approximately 47 acres in size and have a capacity of approximately 553,200 cubic yards of waste. This unit has been designed as a double-lined landfill with a leachate collection and removal system (LCRS) above the primary liner and a leak detection and removal system (LDRS) between the primary and secondary liners. A vadose zone monitoring system (VZMS) has also been included as a detection system for leaking in the secondary LDRS system. Leachate that collects in the sumps of the LCRS, LDRS, and VZMS will be pumped through pipes to the surface of the landfill, where it will be collected in temporary storage tanks located on a crest riser pad at the north end of the landfill. Leachate will be managed by recirculating the liquid and applying it to the landfill soil cover for enhanced evaporation, thereby containing all leachate and potential contaminants within the lined landfill cell.

A run-on/runoff system, designed to control the water volume resulting from a 24-hour 25-year storm, will be installed to manage stormwater. Run-on originating off-site will be directed around or away from the proposed landfill area using unlined ditches. Potentially impacted runoff in the active portion of the landfill will be collected in the bottom of the landfill in a contaminated stormwater collection basin that overlies the landfill liner system. Runoff water collected within the contaminated water basin will be managed by pumping the water to remove the standing water in the basin and applying it, using a moveable piping and sprinkler system or tanker trucks, to the landfill soil cover for enhanced evaporation. Clean runoff from within the excavated area of the landfill unit, but not from the active portion of the landfill, will be directed to the stormwater collection basin located at the south end of the landfill (Drawing 10). Water in

the non-contact stormwater collection basin within the landfill excavation will be sampled prior to discharging outside the lined landfill area. If not tested or if impacted above New Mexico Water Quality Control Commission (NMWQCC) standards, non-contact stormwater will be handled in the same manner as contact stormwater. If not impacted, the stormwater will be pumped to site ditches or directly to the detention basin, where it will be evaporated. Clean stormwater will be pumped out to the stormwater control system for the site.

A daily cover consisting of nonhazardous soil will be spread on top of the active waste placement area to limit wind dispersal. Dust generation will be reduced by restricting traffic to predetermined haul roads on the surface of the daily cover and by applying small amounts of water spray to moisten the soil surface. Water applied for dust control may include clean water supply, leachate, and runoff water collected within the landfill contaminated water basin. Leachate will only be used for dust control on daily cover, not final cover soil.

Access to the landfill will be provided by two roads located on the east and west slopes. During interim filling stages, the landfill will be partially lined to the axis of the access roads (Drawing 10). A ramp will be provided to access the stormwater collection basin.

2.2 Runoff and Drainage Control System

Facility stormwater control is provided by a network of surface water run-on and runoff diversion channels and collection and detention basins. A diversion channel located on the east of the Facility will provide run-on control from the east watershed area. To control the runoff from the facilities area, several collection channels and culverts will be built to divert discharges from storm events to a stormwater detention basin. The location of the collection channels, culverts, and detention pond are shown on Drawing 25.

3 OPERATIONS

3.1 Waste Acceptance

Prior to initiation of a shipment of waste to the Facility, the generator of the waste shall provide a full characterization of its waste and receive approval from the Facility to ship the waste. The Facility shall use the waste characterization data to perform the following activities:

- i. ensure that the waste can be accepted in accordance with the RCRA permit;
- ii. verify that the Facility has the capability to properly dispose of the waste;
- iii. identify any safety precautions that must be taken to properly manage the waste;
- iv. use the physical characteristics and chemical composition of the waste to determine the most effective disposal methods for the waste; and
- v. select parameters to be tested upon arrival of the waste shipment at the Facility to verify that the waste accepted is the waste characterized.

The following sections provide details of the waste acceptance procedures that shall be implemented at the Facility.

3.1.1 Pre-Shipment Procedures

- i. Prior to entering into an agreement to manage a waste stream for a generator, the Facility shall require the generator to supply enough data to determine the physical and chemical characteristics of the waste stream, as well as the U.S. Environmental Protection Agency (EPA) waste codes applicable to the waste stream.
- ii. The Facility shall work with the waste generator to assure that all waste analyses and waste characterization information are provided to meet the applicable requirements of 20.4.1 NMAC. If the data supplied are not adequate to provide a complete characterization of the waste stream, the Facility will either require additional data from the generator or will not accept the waste.
- iii. Before a waste stream may be accepted by the Facility for disposal, the generator must provide the following information:
 - a completed Waste Profile Form (EPA 530-R-94-024) or a comparable form approved by the Facility and signed by an authorized agent of the generator. The typical parameters that the generator should include in the waste stream profile are discussed in Sections 4.3.3;
 - a representative sample of the waste;
 - a description of the process that generated the waste;
 - a Land Disposal Restriction (LDR) Notification;
 - all supporting data required by 40 CFR § 268.7;
 - if the waste is an LDR waste that the generator has treated it to applicable BDAT standards, the generator must supply applicable LDR Certification specified in 40 CFR § 268.7, a copy of the waste analysis plan required by 40 CFR § 268.7, and the applicable LDR Certification and analytical data necessary to show compliance with 40 CFR § 268.7;
 - if the waste is an LDR waste that the generator has determined meets the Best Demonstrated Available Technologies (BDAT) treatment standards without any type of secondary treatment, applicable LDR Certification and analytical data necessary to show compliance with 40 CFR § 268; and
 - documentation that supports the information presented on the waste profile form.

- i. The representative sample submitted during the pre-acceptance process shall be analyzed by an independent laboratory. Each waste with reactive properties also shall be tested for compatibility with the landfill and surface impoundment materials. The analytical results shall be compared with the generator's waste profile form, and the discrepancies will be resolved with the generator prior to approval being granted to the generator to ship the waste. Information from the waste profile form and analytical results will be compared with the Facility's permit to ensure that the waste is acceptable for disposal at the Facility.
- iv. The Facility shall conduct required/supplemental analysis according to EPA or ASTM methods on all incoming hazardous waste to further characterize the waste. Supplemental analyses shall be performed on all waste suitable for direct landfilling from the generator if slight discrepancies exist between the Waste Profile Form and the shipped waste. Sampling methods are described in Section 4.5 of the Part B Permit Application.
- v. The Facility may waive one or more of the analyses under the following conditions:
 - the waste is a portion of continuously shipped, well documented waste stream;
 - the waste has been approved for receipt by NMED on an emergency basis;
 - Facility personnel either sampled, or oversaw the sampling of, the waste at the point of generation and the required/supplemental analyses have been conducted;
 - a representative sample cannot be practically obtained;
 - other factors are introduced which preclude the need for required/supplemental analyses; and
 - the Facility shall document the reason for the waiver of required/supplemental analyses.
- vi. Generators shall conduct random sampling and analyses of waste streams. The procedures for selecting and sampling waste are described in Section 4.6 of the Part B Permit Application.

3.1.2 First-Time Waste Acceptance Procedure

- i. When a waste has been approved for disposal at the Facility, the waste may be scheduled for shipment. Twenty four-hour notice shall be required from each generator prior to waste shipment to enable the Facility to prepare for receipt of the waste, including preparing for sample collection and fingerprint analyses and preparing all necessary documentation on the waste shipment. If adequate capacity to receive the waste is not available, the generator shall be directed not to ship the waste until notified by the Facility.

- ii. Upon arrival at the Facility, the waste shall be analyzed to determine if it matches the Waste Profile Form and representative sample (Table 4.2 of the Part B Permit Application). If discrepancies are noted, the waste shall be further analyzed using supplemental analyses methods (Table 4.3 of the Part B Permit Application). In addition, the Facility may specify any testing that is deemed necessary to ensure that the waste is properly characterized.
- iii. The Facility shall conduct analysis of first five shipments of each waste stream to ensure conformity with the waste generator supplied information.
- iv. Any waste that does not meet the waste acceptance criteria shall be returned to the generator.

3.1.3 Ongoing Waste Acceptance Procedure

- ii. Confirmatory analyses shall be performed according to Section 4.4 of the Part B Permit Application.
- iii. The Facility shall conduct random sampling and analysis of incoming hazardous waste.

3.2 Waste Handling

This section refers to the general procedures and analyses that shall be performed once a waste stream has been accepted in the Facility.

3.2.1 Incoming Load Procedures

- i. When a waste shipment arrives at the Facility, the truck shall be routed to a parking area outside the Facility gate while documents are reviewed. Required documentation will include a waste manifest, an LDR certification, and a copy of the Waste Profile Form (or waste profile number if the form is already on file). The paperwork shall be reviewed for completeness and checked against the waste shipment to verify that the numbers of containers and waste labels match the description on the manifest.
- ii. If the paperwork is in order, the truck shall be routed to the truck sample station, a staging area inside the Facility gate.
- iii. If a discrepancy is found in the paperwork, the Facility shall contact the generator for resolution prior to acceptance of the load and will reject the load if the discrepancy cannot be resolved (generally in less than 24 hours). During the time the discrepancy is being resolved, the waste shipment shall remain in a secure area inside the Facility gate.
- iv. In those instances where a discrepancy with the manifest cannot be resolved within 15 days of receiving the waste the waste will be returned to the generator and a letter shall be submitted to NMED describing the discrepancy and the attempts to reconcile it. A copy of the manifest or shipping paper at issue also shall be provided to NMED, as

specified in 40 CFR § 264.72(b). All discrepancy resolutions shall be documented in writing and maintained in the Facility operating record.

3.2.2 Ongoing Complete Waste Analysis

- i. If one or more waste shipments in a calendar year from any single generator do not match the fingerprint tests, full sample analyses of each waste stream from the generator shall be performed.
- ii. If all waste shipments in any given calendar year from a single generator match the fingerprint analyses, full sample analyses of each waste stream from that generator shall be performed annually.
- iii. On an annual basis, the Facility shall randomly sample and analyze a minimum of 10% of the incoming waste streams that are to be directly landfilled. The samples shall be split into a minimum of two aliquots. One will be retained at the Facility for on-site chemical analyses and the other shall be analyzed at an off-site analytical laboratory for conformance to the LDR requirements. If the results of the analysis indicate that the waste does not conform to the applicable LDR requirements, the Facility shall immediately contact the generator and suspend the placement of that waste stream into the landfill. Disposal of the waste stream shall be discontinued until the discrepancy regarding compliance with the LDR requirements has been resolved and the generator has demonstrated that its ongoing program for compliance with LDR requirements is adequate.

3.2.3 Waste Tracking

- i. A Facility specific number shall be assigned to each waste stream. The designated number shall identify the generator, a sequential number specific to the substance and source and the delivery date.
- ii. The number shall be recorded on: (1) all incoming paperwork from the generator; (2) samples received from the generator; (3) samples taken on site; and (4) site-generated records.

3.2.4 Compliance with Regulations for Disposal

- i. Additional analyses may be required dependent on the final disposition of the waste.
- ii. Containers shall be inspected prior to disposal to ensure that the integrity of the container is suitable for storage.
- iii. Solid wastes that exceed 500 parts per million by weight (ppmw) of volatile organics shall only be stored in DOT containers approved for shipment of hazardous waste.

- iv. No wastes shall be placed in the landfill until those wastes meet applicable LDR standards. All information obtained to document LDR compliance shall be maintained in the Facility operating record.
- v. Wastes that carry more than one characteristic or listed waste code shall be treated to the most stringent treatment requirements for each hazardous waste constituent of concern prior to disposal in the landfill. When wastes with differing treatment standards are combined solely for the purpose of treatment, the most stringent treatment specified shall be met for each constituent of concern in the combined waste prior to land disposal.
- vi. Prior to disposal, hazardous wastes contained in lab packs shall be treated to meet applicable treatment standards for each waste type.
- vii. Reactive hazardous waste shall not be placed in the landfill until it has been rendered non-reactive by treatment.
- viii. F001 – F005 spent solvents shall not be disposed of in the landfill unless applicable treatment standards, set forth in 40 CFR § 268 Subpart D, are met.
- ix. “California List Wastes” shall not be accepted at the Facility unless they can be treated to LDR standards.
- x. Unacceptable PCB contaminated wastes are defined in Section 1.1.2 of the Waste Analysis Plan (Attachment F).
- xi. The Facility shall accept contaminated debris only in the cases where that debris will remain hazardous after it has been treated in accordance with 40 CFR § 268.45(b) or (c).

3.3 General Procedures for Hazardous Waste Generated at the Facility

- i. The types of waste that might be expected to be generated at the site are discussed in Section 4.5.6 of the Part B Permit Application.
- ii. During inspections of these facilities, if waste materials are identified, they shall be characterized, and managed according to the waste analysis plan. Management of spill residues that do not require the implementation of the contingency plan shall be managed in accordance with the applicable requirements in this Permit. Spills or releases that require implementation of the contingency plan shall be managed in accordance with the requirements of the plan.
- iii. Leachate collected in the unit sumps will be pumped into temporary storage tanks that are part of the landfill operation. Leachate shall be managed within the landfill unit by applying the leachate to the landfill soil cover for enhanced evaporation and dust suppression.

3.4 Landfill Operation

3.4.1 Records

- i. The Facility shall maintain complete records of the wastes disposed of in the landfill. The documentation will contain results of waste analyses, waste compatibility analyses and waste handling compliance. Additional documentation shall register the exact location of a waste within a three-dimensional grid system. Grid dimensions shall be a minimum of 50 feet by 50 feet.
- ii. Records of inspections of the landfill shall be maintained in the Facility operating record.
- iii. Preventive maintenance information shall be documented and kept in the Facility operating record.
- iv. Maintenance performed on the structures and equipment part of the landfill unit shall be documented in the Facility operating record.

3.4.2 Procedures for Ignitable/Reactive Wastes

- i. Reactive wastes shall be treated or mixed by the generator prior to placement in the landfill so that the resulting waste mixture no longer meets the definition of reactive waste. Required treatment shall be handled by the waste generator off-site.
- ii. Ignitable waste shall be treated or mixed by the generator prior to placement in the landfill so that the resulting waste mixture no longer meets the definition of ignitable waste. Required treatment shall be handled by the waste generator off-site.
- iii. Reactive wastes shall be separated from sources of reaction.

3.4.3 Waste Placement

- i. The landfill shall only be accessed by means of ramps indicated in Drawing 10 (Permit Attachment L1).
- ii. The active areas of the landfill will be accessed by temporary roadways that will be established on top of the waste and daily cover.
- iii. Incompatible wastes shall be separated by at least one grid distance to prevent commingling.
- iv. Lab packs may be placed in the landfill only if they meet the requirements in 40 CFR § 264.316. Lab packs shall not be accepted if incompatible wastes are placed within the same lab pack or if reactive wastes have not been treated to render them non-reactive.
- v. Bulk and containerized wastes shall not be placed in the landfill unless they meet the requirements in 40 CFR § 264.314.

- vi. Containers less than 90% full may be crushed to the maximum extent possible through compaction when placed in the landfill.
- vii. Wind dispersal shall be controlled with a daily cover consisting of soil spread on top of the waste with a minimum thickness of 0.5 foot.
- viii. Dust generation shall be reduced by applying small amounts of water spray to moisten the soil surfaces. Water applied for dust control may include clean water supply, leachate, and runoff water collected within the landfill contaminated water basin. The water will be applied using both a piping and sprinkler system and water trucks equipped with a pump, piping and an array of nozzles that spray very small water droplets. The frequency of the water application will depend on the climate and traffic. Sufficient moisture shall be applied to all soil surfaces on an as-needed basis to prevent wind erosion. However, the application of water shall be limited so that ponding in the landfill does not occur.
- ix. Waste placement operations shall be halted when wind speed exceeds 35 mph.
- x. Landfill operational staff shall visually observe trucks leaving the area for caking of waste on the tires and/or truck body. If accumulation is noted, physical cleaning of the trucks shall be performed within the lined landfill on an area with soil cover daily waste disposal working face. Any waste resulting from cleaning shall be covered with daily soil cover. The potential for waste accumulating on trucks shall be minimized by limiting the daily waste disposal working face to the smallest practical area. All other areas shall have soil cover over the waste.
- xi. Facility controls shall be used to mitigate the spread of hazardous waste. Landfill staff shall direct all truck traffic on-site, including riding with drivers, if needed. At a base of the landfill cell, a designated compacted, flat unloading area shall be used that shall be completely separate from waste disposal areas. Trucks shall not come into contact with placed hazardous waste, daily cover, or sprayed and recirculated leachate. If needed, a portable pressure washer system or other physical removal device may be implemented in the bottom of lined landfill cell.

3.4.4 Operation of Leachate Collection and Detection Systems

- i. Pumpable liquid in the LCRS, LDRS, and VZMS sumps shall be removed in a timely manner to prevent the head on the respective liners from exceeding 12 inches above the floor liner system. The depression in the sumps shall be used to provide sufficient head to operate the pumps.
- ii. The leachate collected from the sumps will be temporarily stored in tanks.
- iii. Overfilling of the tanks shall be controlled with high-level control switches which will automatically shut down the sump pumps. An alarm shall be activated that will notify personnel that the system requires maintenance. Volume of leachate pumped will be

monitored by means of cumulating flow meters. Total liquids pumped shall be recorded daily.

- iv. The leachate collection tanks will be used as 90-day storage units and managed accordingly.
- v. Once the leachate levels in the riser crest pad tanks exceed 50 percent of the holding capacity the liquids will be removed by tanker truck and recirculated over lined areas of the landfill.
- vi. A fluid level pressure transducer shall be installed in the LCRS, LDRS, and VZMS sumps. The pressure transducer will be wired to a digital readout box located at the crest riser pad. The readout box shall show the depth of leachate in the sump. The readout box shall be checked during the routine inspections which are presented in Table 5-1 of the Part B Permit Application. When the leachate level is 12 inches or greater than the pump shall be activated to remove leachate from the sump. The pump will be turned off when the leachate inflow rate becomes too small for the pump to stay activated. Volumes of leachate shall be recorded as previously stated in paragraph C of this section.
- vii. In the event of large rain storms both the side slope riser pipe pumps and the vertical riser pipe pumps can be used to minimize head. Liner systems facility staff will be available to address large rain storm events by utilizing vacuum trucks or portable pumps to remove excess leachate and contaminated runoff, if required. Runoff water collected within the contaminated water basin will be managed by pumping the water to remove the standing water in the basin and applying it to the landfill soil cover for enhanced evaporation. A moveable piping and sprinkler system will be used to distribute the water onto the soil cover. Vacuum trucks with spray bars may also be used to apply water to the soil cover and landfill roads.

3.4.5 Inspection and Monitoring

- i. Inspections shall be performed according to the schedule matrix indicated in Table 5-1 of the Part B Permit Application.
- ii. The schedule matrix shall be expanded, as necessary, to reflect new equipment or changes to existing equipment inspection frequencies.
- iii. The landfill and associated equipment shall be inspected weekly and after storms.
- iv. The LCRS, LDRS and vadose sumps shall be checked daily for the presence of liquid. Pressured transducers will be used to measure the presence of liquids in the sump. The elevation of the transducer will be determined during installation. The transducer elevation combined with the fluid pressure on the transducer will allow calculation of the fluid elevation at any time.

- v. The leachate collection tank shall be inspected according to the procedures indicated in Section 5.2.5 of the Part B Permit Application.
- vi. Ancillary equipment shall be inspected according to the manufacturer recommended programs.
- vii. Surveys of the active landfill surface area and the riser pipes with an organic vapor monitor (OVM) or comparable device shall be performed quarterly to detect the presence of organic compounds.
- viii. The landfill shall be inspected by properly-trained personnel for items such as spills, leaks, odors, wind-blown particulate matter, deterioration of the landfill itself, malfunction or improper operation of the run-on/runoff control systems.
- ix. Inspections shall be documented in inspection checklists that shall be maintained in the Facility Operating Record for at least 3 years.
- x. If deterioration or any other abnormalities are noted, the inspector's supervisor shall be notified and will determine the appropriate course of action for correction. If the supervisor is not available, the Emergency Coordinator (EC) shall be summoned to make the determination.
- xi. The stormwater and contaminated water basin shall be inspected to ensure that liquid has not accumulated. The collection systems shall be emptied at a frequency that ensures that the design capacity of the system is not exceeded. Stormwater collected within the landfill that has the potential to have contacted waste will be managed by enhanced evaporation through recirculation on the landfill soil cover. Vacuum trucks may also be used to empty the basins. Management of runoff water by recirculation for enhanced evaporation keeps all water that has a potential to contact waste within the lined landfill cell.
- xii. The sump pumping and instrumentation system shall be checked annually to ensure that it is functioning properly. The pumping system shall be turned on to check if the system works. If the system is not functioning properly the systems shall be repaired in accordance with the manufacturer's recommendations or shall be replaced. If there is adequate leachate in the sump, visual observation of flow into the storage tanks shall be used to determine if the system is functioning properly. If there is insufficient leachate, then audible indications that the pump has engaged shall be used to determine if the pump is functioning. The pressure transducers shall be extracted from the sump and placed in the solution of known depth to determine if the transducer is functioning properly.
- xiii. If either the pumping system or transducer fails to function as designed, then the failing piece of equipment shall either be replaced or repaired as soon as possible.

- xiv. Determination if the Action Leakage Rate (ALR) has been exceeded in the landfill shall be conducted in accordance with 40 CFR § 264.302(b). This is discussed in further detail in the Action Leakage Rate and Response Action Plan (Permit Attachment J).

The average daily flow in the LDRS sump shall be calculated as follows:

- Determine volume from cumulative flows for the week
 - Determine landfill area based area of landfill in service (horizontal protected area)
- xv. Calculate average daily flow by calculating total gallons for the week/area of landfill in service.
- xvi. The Response Action Plan shall be implemented if leaks are detected.
- xvii. Trucks shall be inspected to prevent tracking of waste out of the landfill on vehicles tires or bodies.
- xviii. Wind speed will be monitored using a hand-held wind meter to determine if wind speed exceeds 35 mph. Waste placement operations will be halted when wind speed exceeds 35 mph.

4 MAINTENANCE

4.1 Landfill

- i. The landfill structure shall be maintained through a routine preventive maintenance program, which shall be fully defined in the final operations plan.
- ii. Preventive maintenance shall involve regular visual inspections of the landfill liner where feasible and review of leachate collection and analysis results.
- iii. Defects detected in the liner systems shall be repaired according to the procedures indicated in the Construction Specifications: Sections 02710, 02775 and 02780. Soil surfaces that need to be repaired shall be removed and replaced according to the Construction Specifications: Sections 02226 and 02119.
- iv. The LCRS and LDRS equipment, such as pumps, transducers, generators, electrical lighting, and warning systems, shall be subject to manufacturer's or standard preventive maintenance procedures.
- v. Preventive maintenance information shall be documented and any deviation from normal conditions shall be closely tracked and corrected as necessary.
- vi. Landfill run-on/runoff control systems shall be maintained/repared after regular inspections (as described in Table 5-1 of the Part B Permit Application) that determine that the design criteria are not met. Once a deficiency in the run-on/runoff control system is noted, it shall be repaired in a timely manner and returned to a state such that it meets or exceeds design criteria.

4.2 Drainage Ditch

- i. Drainage ditches shall be inspected weekly and immediately after a major storm event.
- ii. Excess sediment and debris that prevents flow in accordance with the design specifications shall be removed manually or with a backhoe.
- iii. Drainage ditches shall be maintained/repared after regular inspections (as described in Table 5-1 of the Part B Permit Application) that determine that the design criteria are not met. Once a deficiency in the run-on/runoff control system is noted, it shall be repaired as soon as practicable to a state such that it meets or exceeds design criteria.