

Part IV

Site Operating Plan

City of University Park
Solid Waste Transfer Station

MSW Permit No. 227

Prepared for:

The City of University Park
Dallas County, Texas

February 12, 2007
Revision 2

Revised May 18, 2007

Prepared by:

Chiang, Patel & Yerby, Inc.
1820 Regal Row, Ste. 200
Dallas, Texas 75235
Ph: (214) 638-0500
Fax: (214) 638-3723

This Site Operating Plan (SOP) is Part IV of the MSW permit application and consists of the information required by Title 30, Texas Administrative Code (TAC), Chapter 330, Subchapter E: Operational Standards for Municipal Solid Waste Storage and Processing Units, 30 TAC §330.201–§330.249. This SOP contains information about how The City of University Park will conduct operations at the facility, but is not intended to be a comprehensive operating manual. This SOP represents the general and specific instruction for facility management and personnel to operate the facility in a manner consistent with the approved design and the commission’s rules to protect human health and the environment and prevent nuisances.

Facility Name: City of University Park Transfer Station

TCEQ MSW Permit/Registration Number: MSW 227

Facility Address: 2525 E University Blvd; Dallas, TX 75206

RN Number: RN100697663

CN Number: CN600292122

Transfer Station Personnel

Equipment Operators operate the site on a daily basis under the general supervision of the Sanitation Superintendent. Employees may be added if necessary to keep the site in compliance with all applicable rules and regulations. All personnel will have sufficient training and experience to perform their specific duties.

Training Requirements

Personnel training procedures will be recorded in accordance with §330.219(b)(2). At a minimum, new employees will be indoctrinated on the contents of this SOP during initial orientation training. All personnel will receive a refresher overview of the contents of this SOP annually. Training rosters documenting this training and any other topics will be retained on file for three years.

Personnel operator licenses issued in accordance with 30 TAC §30, Subchapter F, Municipal Solid Waste Facility Supervisors, will be maintained as required.

Equipment

Table 1 summarizes the equipment used at the facility. Additional equipment will be stationed at other City facilities and transported to the Transfer Station as needed. Equipment may change, as necessary, to adequately maintain the Transfer Station and meet the operational standards required by the regulations of federal, state and local agencies. The City may also rent or contract for equipment as necessary.

Table 1 - Facility Equipment List

| Equipment Type | Number (Minimum) | Function |
|-----------------------|---------------------------|---|
| Stationary Compactors | 2 (Min 1 in Operation) | Waste compaction and transfer trailer loading |
| Transfer Trailers | 2 | Waste transfer |

§330.203 Waste Acceptance and Analysis

Authorized Wastes

The transfer station will receive the following wastes for storage and processing from within the city limits:

- Residential municipal solid waste
- Commercial municipal solid waste

Waste is accepted only from University Park residents and city collection vehicles from sources including residential collection routes, Southern Methodist University, and other commercial entities served by city collection forces.

Special Waste Receipt

A minimal quantity of dead animals is accepted at the transfer station. These consist of dead animals recovered from roadways (road-kill) or domestic animals from households. Due to the size and limited number of dead animals received, they will not require any special handling to protect human health and the environment, and will be unloaded directly into the charging hopper of the compactor unit along with the other MSW.

Prohibited Wastes

Wastes authorized above shall not contain, or the transfer station will not accept the following:

- Regulated Hazardous Waste other than from Conditionally Exempt Small Quantity Generators (CESQG). Municipal hazardous waste from a CESQG may be accepted; provided the generator provides a certification that it generates no more than 220 pounds of hazardous waste per calendar month.
- Polychlorinated Biphenyls (PCBs) wastes, as defined under 40 Code of Federal Regulations, Part 761
- Lead acid storage batteries
- Do-it-Yourself (DIY) used motor vehicle oil
- Used-oil filters from internal combustion engines
- Whole used or scrap tires
- Items containing chlorinated fluorocarbons (CFC's), such as refrigerators, freezers, and air conditioners, will only be accepted at the site if the generator or transporter provides written certification that the CFC's has been evacuated from the unit and that it was not knowingly allowed to escape into the atmosphere, or the city staff will properly evacuate the CFC's from the appliance on site.
- Liquid waste (any waste material that is determined to contain "free liquids" as deemed by EPA Method 9095 (Paint Filter Test), as described in "Test Methods for Evaluating Solid Wastes, Physical Chemical Methods" (EPA Publication Number SW-846)) shall not be accepted unless it is:
 - Bulk or noncontainerized liquid waste that is:
 - household waste other than septic waste; or

Contained liquid waste and the container is a small container similar in size to that normally found in the household waste; the container is designated to hold liquids for use other than storage; or the waste is a household waste.

- Regulated Asbestos Containing Materials
- Industrial solid waste
- Construction and Demolition waste that may damage equipment

Measures for Controlling Prohibited Wastes

Procedures to detect and control the receipt of prohibited wastes include:

1. Informing facility customers of prohibited wastes by posting one or more signs at the facility entrance listing prohibited wastes.
2. Waste screening of incoming non-city vehicle loads for Prohibited Waste. This includes any waste that the facility operator determines that, due to its composition, size, etc., poses a hazard to personnel or may cause damage to equipment. This waste may be rejected and not accepted for processing by the facility. The following are key indicators to be vigilant for:
 - a. Wastes not readily identifiable as associated with having come from a household.
 - b. Yellow hazardous waste or PCB labels.
 - c. DOT hazardous markings on the outside of containers.
 - d. 55 gallon drums.
 - e. 85 gallon drums.
 - f. Powders or dust.
 - g. Odors or chemical fumes.
 - h. Sludge.
 - i. Bright or unusually colored waste.
 - j. Paint related products (except solidified contents).
 - k. Automotive products (e.g. tires, used oil, oil filters, etc.)
 - l. Lawn chemicals (pesticides, herbicides, fungicides).
 - m. Red bagged medical waste.
 - n. Granulated pool chemicals.
 - o. Compressed gas cylinders.
 - p. Construction or demolition debris.
 - q. Appliances (place in salvage area).

Prohibited wastes will not be accepted. Customers with prohibited wastes will be informed how to properly dispose of the waste.

The transfer station receives an average of 60 tons of waste daily; a maximum of 375 cubic yards of waste may be stored in the transfer trailers at any one point in time (Five 75-cubic yard trailers); for an average length of time of 1 days up to a maximum length of time not to exceed 3 days except over holiday weekends. Transfer trailers are generally taken to the landfill upon filling to capacity, but may be stored full or partially full over night, a holiday or a weekend. The trailers are completely enclosed during storage, and do not create nuisance conditions. All waste that is not segregated for recycling is transferred to a Type I Municipal Solid Waste Landfill for disposal.

§330.205 Facility-Generated Wastes

Wastes generated by the transfer station will be processed or disposed at an authorized solid waste management facility.

Wastewaters generated by the transfer station will be managed in accordance with §330.207, Contaminated Water Management, as outlined below.

§330.207 Contaminated Water Management

All liquids resulting from the operation of the transfer station will be disposed of in a manner that will not cause surface water or groundwater pollution. The facility washwater runoff passes through a grease and grit trap, and then is discharged to the public sewer system for treatment at an authorized wastewater treatment plan. The trap is periodically serviced by an authorized liquid waste handler.

Off-site discharge of contaminated waters will be made only after approval under the Texas Pollutant Discharge Elimination System authority.

Wastewaters discharged to a treatment facility permitted under Texas Water Code, Chapter 26 will not:

1. interfere with or pass-through the treatment facility processes or operations
2. interfere with or pass-through its sludge processes, use, or disposal
3. otherwise be inconsistent with the prohibited discharge standards, including 40 Code of Federal Regulations Part 403, General Pretreatment Regulations for Existing and New Source Pollution

The daily effluent design standard for oil and grease concentration leaving the facility and entering a public sewer system will not exceed:

1. The concentration established in the wastewater discharge permit pretreatment limit or the concentration established by the treatment facility permitted by the City of Dallas under Texas Water Code, Chapter 26, the National Pollutant Discharge Elimination System.

§330.209 Storage Requirements

All solid waste will be stored within fully enclosed rear-loading transfer trailers such that it does not constitute a fire, safety, or health hazard or provide food or harborage for animals and vectors, and shall be contained or bundled so as not to result in litter. There is no storage capacity within the transfer station itself, with the exception of the hopper of the horizontal compactors. Material is quickly loaded into a transfer trailer.

An on-site storage area for white goods and scrap metal will be provided that is separate from a transfer station or process area. Control of odors, vectors, and windblown waste from the storage area will be maintained.

§330.211 Approved Containers

All solid waste containing food wastes will be stored in covered or closed containers that are leak proof, durable, and designed for safe handling and easy cleaning.

Reusable containers will be maintained in a clean condition so that they do not constitute a nuisance and to retard the harborage, feeding, and propagation of vectors.

All containers to be emptied manually will be capable of being serviced without the collector coming into physical contact with the solid waste.

Containers to be mechanically handled will be designed to prevent spillage or leakage during storage, handling, or transport.

§330.213 Citizen's Collection Stations

No separate Citizen's Collection Station area is provided at the transfer station.

§330.215 Requirements for Stationary Compactors

The stationary compactors at the site shall be operated and maintained in compliance with the permit and so that they do not create a public nuisance.

§330.219 Recordkeeping and Reporting Requirements

A copy of the permit, the approved application, and any other required plan or other related document will be maintained at the Sanitation Department Offices at all times. An as-built set of construction plans and specifications will be maintained at the Sanitation Department Offices. These plans will be furnished upon request to TCEQ representatives and made available for inspection by TCEQ representatives or other interested parties. These plans and documents are part of the facility operating record. The operating record will be maintained in an organized format which will allow information to be easily located and retrieved. All information contained within the operating record and the different required plans will be retained during the active life of the facility until after certification of closure.

In addition to the plans and documents listed above, the information listed in Table 1 will be recorded and retained in the operating record. This information will be placed in the operating record within seven working days of completion or upon receipt of analytical data, as appropriate.

Table 1 – Operating Record

| Records To Be Maintained | Rule Citation |
|--|----------------------|
| 1. Inspection records and training procedures | §330.219(b)(2) |
| 2. Closure plans | §330.219(b)(3) |
| 3. All cost estimates and financial assurance documentation relating to financial assurance for closure | §330.219(b)(4) |
| 4. Copies of all correspondence and responses relating to the operation of the facility, modifications to the permit/registration, approvals, and other matters pertaining to technical assistance | §330.219(b)(5) |
| 5. Any other document(s) as specified by the approved permit/registration or by the executive director | §330.219(b)(7) |

§330.221 Fire Protection

Fire Protection Plan

The following steps are taken regularly at the facility by designated personnel to prevent fires:

- Operators will be alert for signs of burning waste such as smoke, steam, or heat being released from incoming waste loads.
- Smoking is not permitted near waste management areas.

Procedures in the Event of a Fire

Staff will take the following steps if a fire is discovered:

- Contact the Local Fire Department by calling 911.
- Alert other facility personnel.
- Assess extent of fire, possibilities for the fire to spread, and alternatives for extinguishing the fire.
- If it appears that the fire can be safely fought with available fire fighting devices until arrival of the Local Fire Department, attempt to contain or extinguish the fire.
- Upon arrival of Local Fire Department personnel, direct them to the fire and provide assistance as appropriate.
- Do not attempt to fight the fire alone. Do not attempt to fight the fire without adequate personal protective equipment. Be familiar with the use and limitations of firefighting equipment available onsite.

Fire Fighting Methods

Fire fighting methods for burning solid waste include smothering the waste, separating burning material from other waste, or spraying with water. Small fires might be controlled with hand-held extinguishers.

If a fire occurs on a vehicle or piece of equipment, the equipment operator will bring the vehicle or equipment to a safe stop. If safety of personnel will allow, the vehicle will be parked away from fuel supplies, uncovered solid wastes, and other vehicles. The engine will be shut off and the brake engaged to prevent movement of the vehicle or piece of equipment.

Water Supply

An adequate supply of pressurized water supply is available on-site for fire fighting purposes.

Fire Equipment

The facility will be equipped with fire extinguishers of a type, size, location, and number as recommended by the local fire department. Each extinguisher will be inspected on an annual basis and recharged as necessary. A qualified service company will perform these inspections, and all extinguishers will display a current inspection tag. Inspection and recharging will be performed following each use.

Fire Protection Training

Training of on-site personnel in firefighting techniques, fire prevention, response, and the fire protection aspects of the SOP will be provided, on an annual basis. Personnel will be familiar with the use and limitations of firefighting equipment available onsite. Records of this training will be included in the operating record for the facility for a minimum of three years.

§330.223 Access Control

Facility Security

Public access will be controlled to minimize unauthorized vehicular traffic, unauthorized and illegal dumping, and public exposure to hazards associated with waste management. Controlled access is provided by fences, walls and locked gates, all with minimum heights of 6-feet. The facility is open to citizens Monday through Friday only, and to city collection vehicles Monday through Saturday. The facility gate is closed on Saturdays, and operated by a remote control located in city collection vehicles.

Facility attendants

During times when the site is open to the public, the facility will be manned by one employee at a minimum. This employee will be responsible for controlling access of City and public vehicles.

At times when the facility is open to only City vehicles, each vehicle operator will provide access control to the facility through the use of the remote controlled gate, which is controlled by the vehicle operator during these times.

Vehicle Access

Public access roads to the site are paved, all-weather roads. Only vehicles authorized by the manager, personnel vehicles, and authorized haul vehicles will have access beyond the facility entrance. The access roads provide adequate vehicle circulation space and turning radii, as to not disrupt normal traffic flow on the surrounding streets.

Vehicles transporting solid waste arriving at the facility will proceed to the unloading area. Operations will be conducted in a manner that allows the prompt and efficient unloading of waste. Each unloading hopper is equipped with curbing to prevent vehicles from inadvertently backing into the hopper.

Adequate parking is provided on site for all employees and visitors that may be at the site.

Dust and Mud Control

Tracked mud and associated debris at the entrance to the facility and on the public roadway at the entrance to the facility are not anticipated to be of concern at the site due to the fact that collection vehicles accessing the site operate entirely on paved roadways. Additionally, the site is entirely paved, and all access roads are paved.

Dust from on-site and other access roadways will not become a nuisance to surrounding areas. A water source and necessary equipment or other means of dust control approved by the TCEQ executive director will be provided. Several times a week, a street sweeper removes dust from the site.

§330.225 Unloading of Waste

The unloading of solid waste will be confined to as small an area as practical within the structure of the transfer station (the compactor hopper). The transfer station has two compactors and hoppers.

The unloading of waste in unauthorized areas is prohibited. Any waste deposited in an unauthorized area will be removed immediately and managed properly. A trained employee will be present at the entrance or unloading area at all times during operating hours to monitor all incoming loads of waste, and will direct traffic to the appropriate unloading area.

Equipment operators will monitor the incoming waste. These personnel will be familiar with the rules and regulations governing the various types of waste that can or cannot be accepted into the facility. The personnel will also have a basic understanding of both industrial and hazardous waste and their transportation and management requirements. The facility is not required to accept any solid waste that may cause problems in maintaining full and continuous compliance with the permit/registration.

Certain wastes are prohibited from management at the facility. Prohibited wastes are described in Waste Acceptance and Analysis section of this plan. The unloading of prohibited wastes at the facility will not be allowed. The operator will take necessary steps to ensure compliance. Personnel have the authority and responsibility to reject unauthorized loads, have unauthorized material removed by the transporter, and/or assess appropriate surcharges, or have the unauthorized material removed by on-site personnel and otherwise properly managed by the facility. Any prohibited waste not discovered until after unloading will be placed back in the offending transporter's vehicle, if possible, or otherwise returned promptly to the transporter or generator of the waste. The driver may be advised where the waste may be managed or disposed of legally and will be responsible for the proper handling of this rejected waste.

In the event the unauthorized waste is not discovered until after the delivery vehicle is

gone, the waste will be segregated and controlled as necessary. The manager/supervisor will make an effort to identify the entity that deposited the prohibited waste and have them return to the facility and properly dispose of the waste.

Facility personnel will keep vigilant watch for compliance with operating requirements. Signs with directional arrows and/or portable traffic barricades may be used to help restrict traffic to designated unloading locations. In addition, rules for waste receipt and prohibited waste will be prominently displayed on signs at the facility entrance.

§330.227 Spill Prevention and Control

Storage and processing areas are designed to control and contain spills and contaminated water from leaving the facility. The transfer station site is designed to capture any wash down water and contaminated water, and direct it to the sanitary sewer system through a system of area grates. These grates are designed to accommodate a 25 year, 24 hour storm runoff for the transfer station area, not within the building. The transfer facility does not accept sludges or liquid wastes, and therefore does not expect a "worst case spill".

§330.229 Facility Operating Hours

The facility is authorized to accept waste and operate during the following timeframes:

Hours that the facility is open to the public are from 7:00am to 5:00pm Monday through Friday. These hours will be posted on a sign at the entrance to the facility.

The regular waste acceptance hours for city operated vehicles will be 5:00am to 7:00pm Monday through Friday and from 5:00am to 5:00pm on Saturday (City vehicles only on Saturday).

Normal hours of operation will be 5:00am to 9:00pm Monday through Saturday. Operation of heavy equipment and the transportation of materials on or off-site may occur during this time. This site is also used by other City departments (e.g. streets) and may be accessed 24 hours a day 7 days a week for other non-waste management activities.

When warranted, the Sanitation Superintendent will request approval from the commission's regional office to allow additional temporary operating hours to address disaster or other emergency situations, or other unforeseen circumstances (such as traffic delays or adverse weather) that could result in the disruption of waste management services in the area. The Sanitation Superintendent will document the reason or reasons for the delay for each day on which a delay occurs and place the documentation in the operating record.

In addition to the waste acceptance and operating hours, other non-waste management activities including administrative and maintenance activities may occur twenty-four hours per day, seven days per week.

§330.231 Facility Sign

A conspicuous sign measuring a minimum four feet by four feet will be maintained at the public entrance to the facility. The sign contains, in letters at least three inches high, the following information:

- Facility Name: City of University Park Transfer Station
- Type of MSW Facility: MSW Transfer Station
- Authorized by TCEQ Permit/Registration Number: MSW 227
- Hours of Operation: 5:00am to 9:00 pm Monday Through Saturday
- Open to the Public: 7:00am to 5:00pm Monday Through Friday
- Local Emergency Fire Department Number: 911
- No Hazardous Material Accepted

Signs prohibiting smoking are posted in the transfer station structure, at the unloading areas. A sign will be prominently displayed at the facility entrance stating that all loads will be properly covered or otherwise secured.

§330.233 Control of Windblown Material and Litter

Windblown material and litter will be controlled through several methods, including proper unloading procedures, perimeter fences, the orientation of the facility to the prevailing wind direction, landscaping, and adequate staffing. Personnel will police the facility, including fences, access roads, and the entrance gate, every operating day to pick up and return windblown material and litter to the facility and perform such other litter control measures, as necessary.

§330.235 Materials Along the Route to the Facility

The facility operator will take steps to encourage that vehicles hauling waste to the facility are enclosed or provided with 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. On days when the facility is in operation, the operator will be responsible for at least once per day cleanup of waste materials spilled along and within the right-of-way of public access roads serving the facility to include University Blvd. between the transfer station entrance and the US Highway 75 service road to the west. All city collection vehicles are fully enclosed compactor trucks, or brush collection vehicles. No collection vehicle traffic accesses the site from the east. The site is located in an urban industrial and commercial area a very short distance from a large controlled-access freeway. Litter along access routes more distant than the US Highway 75 service road cannot be expected to have originated from transfer station activities.

§330.237 Facility Access Roads

The facility will abide by the following aspects regarding facility access roads:

Dust from on-site and other access roadways will not become a nuisance to surrounding areas. A water source and necessary equipment or other means of dust control approved by the TCEQ executive director will be provided. Several times a week, a street sweeper removes dust from the site.

Litter and any other debris on-site and other access roadways will be picked up at least daily and taken to the collection area.

Access roadways will be repaired as needed to minimize depressions, ruts, and potholes.

§330.239 Noise Pollution and Visual Screening

The transfer station will have screening to minimize noise pollution and adverse visual impacts. The transfer station is surrounded on three sides by either a masonry wall, or reinforced concrete aggregate hoppers. The western side is enclosed by a chain link fence and landscaping along a commuter train rail line. The eastern side includes a 6-foot tall screening fence atop the concrete aggregate hoppers to reduce visual impacts to neighboring businesses.

§330.241 Overloading and Breakdown

The design capacity of the solid waste facility will not be exceeded during operation. The facility is designed and operates such that there is no storage capacity, except what is stored within the enclosed transfer trailers. When waste is unloaded, it is immediately compacted into a transfer trailer. The facility will not accumulate solid waste in quantities that cannot be processed within such time as will preclude the creation of odors, insect breeding, or harborage of other vectors. If such accumulations occur, additional solid waste will not be received until the adverse conditions are abated.

If a significant work stoppage should occur due to a mechanical breakdown or other causes, the facility will restrict additional solid waste receipt. Under such circumstances, incoming solid waste will be diverted to an approved backup storage, processing or disposal facility. This backup currently includes agreements to dispose of waste directly at the City of Garland Landfill, or one of two City of Dallas Transfer Stations. If the work stoppage is anticipated to last long enough to create objectionable odors, insect breeding, or harborage of vectors, steps will be taken to remove the accumulated solid waste from the facility to an approved backup storage, processing, or disposal facility within 24 hours.

§330.243 Sanitation

All working surfaces that come in contact with wastes will be washed down on a weekly basis at the completion of processing.

Wash waters will not be allowed to accumulate on-site without proper treatment to prevent the creation of odors or an attraction to vectors. All wash waters will be collected and disposed of in an authorized manner.

§330.245 Ventilation and Air Pollution Control

Air emissions from the facility will not cause or contribute to a condition of air pollution as defined in the Texas Clean Air Act.

All solid waste will be stored in odor-retaining containers and vessels.

The facility is operated to provide adequate ventilation for odor control and employee safety. The operator will prevent nuisance odors from leaving the boundary of the facility. If nuisance odors are found to be passing the facility boundary, the facility operator may suspend operations until the nuisance is abated or immediately take action to abate the nuisance.

The owner or operator employs the following measures:

- On-site buffer zones for odor control.
- Immediately loading waste into an enclosed transfer trailer
- Wash the stationary compactors daily and spray a commercial disinfectant into and under the compactor units.
- When the Transfer Trailer is loaded and pulls away from the compactor units, immediately pick up any spillage, wash down the area, and spray with disinfectant.
- Any spillage from the collection vehicles unloading will be picked up and put into the compactor units immediately
- All ramps for the collection vehicles and transfer vehicles will be washed at least weekly.
- All refuse vehicles will be washed and disinfected at least weekly
- Restrict the parking of vehicles or placement of containers containing waste from the west side of the transfer building.
- Employ a “mister” on the transfer building to dispense a product to help mask odors. This unit would only operate during the periods of time when weather conditions tend to restrict the dissipation of odors (i.e. little or no wind, high humidity, temperature inversions, etc.)
- Ensure that loads received that are especially foul smelling are handled quickly and remain at the station for a minimum amount of time.

Reporting of emissions events in accordance with 30 TAC §101.201 is not applicable for this site, Emissions Event Reporting and Recordkeeping Requirements and reporting of scheduled maintenance in accordance with 30 TAC §101.211, Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements is not applicable for this site.

Any ponded water at the facility will be controlled to avoid its becoming a nuisance. In the event that objectionable odors do occur, appropriate measures will be taken to alleviate the condition such as removing the water and correcting drainage patterns to prevent a reoccurrence at the same location.

§330.247 Health and Safety

Facility personnel will be trained in the appropriate sections of the facility's and City's health and safety plan.

§330.249 Employee Sanitation Facilities

The facility provides potable water and sanitary facilities for all employees and visitors.