



STATE OF NEVADA  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
Colleen Cripps, Ph.D., Administrator

October 10, 2012

Joe Prary  
Waste Management of Nevada  
2401 Canyon Way  
Sparks NV 89434

Reference: With respect to Waste Management of Nevada, Lockwood Landfill

Subject: Comments on Current Lockwood Landfill Facility Operating Plan and Monitoring Plan

Dear Mr. Prary:

Please find attached comments on the current Facility Operating Plan and Facility Monitoring Plan. Any questions regarding this may be directed to the undersigned at 775-687-9477 or [jtaylor@ndep.nv.gov](mailto:jtaylor@ndep.nv.gov).

Sincerely,

Jon Taylor PE CEM  
Staff Engineer III  
Solid Waste Branch  
Bureau of Waste Management

JT:dm

cc: Mark W. Franc PE, 3683S 4975W, West Haven, UT, 84401  
Jim Obereiner, 11931 Foundation Place Suite 200, Gold River, CA, 95670

Ec: Art Gravenstein

Enc: Integrated Sitewide Contingency Plan Outline  
Comments on Current Landfill Application

File: 214\_jtaylor\_10012012\_15\_LTR\_Comments n Modification & Current Application.doc



## General Comments

Generally the Application should consist of three main components. A Facility Operating Plan, Design Report and supporting investigatory data. The current sets of plans are not cohesive or easily referenced. Waste Management will be required to reorganize the current set to incorporate all the necessary regulatory requirements in a more efficient manner. Please Tab all Chapters, Appendices, Attachments etc. when responding.

- 1 Facility Operating Plan [NAC 444.684] should contain at a minimum:
  - i. Site Overview
  - ii. Personnel Requirements (with levels of Authority)/Training NAC 444.684
  - iii. Equipment Requirements with contingencies and descriptions NAC 444.684
  - iv. Litter/Dust control program NAC 444.684
  - v. Waste Handling and Acceptance Criteria (Special Waste Management) NAC 444.684
  - vi. Vector Control NAC 444.6678
  - vii. Cover Requirements (daily etc) NAC 444.688
  - viii. Inspections & Operating Records NAC 444.7025
  - ix. Contingency/Emergency Plan (Health & Safety) [Integrated Site Wide Contingency Plan] NAC 444.684
  - x. Groundwater/Methane Monitoring [Control of Explosive Gasses] NAC 444.683/NAC 444.7483/NAC 444.667 [Sampling/QAQC/Statistical Analysis Plan(s)]
  - xi. Leachate Management NAC 444.684
  - xii. Surface Water Management requirements (drainage from active areas) NAC 444.6885
  - xiii. Closure (Incremental where applicable) Post-Closure Procedures/Requirements With Financial Assurance
  - xiv. Additional Requirements for Operating (CQA Plans, etc)
  - xv. Additional Site Specific Requirements
  - xvi. Reserved
- 2 The Design Report must contain all those items in NAC 444.680
- 3 The Investigatory Report would contain the information necessary to support the design NAC 444.680(8)

## Specific Comments

### I. Facility Monitoring Plan

Sections

Introduction

1.1 **Remove the reference to consultants, counties and Federal Regulations (in all cases), Nevada is an authorized state.**

1.2.1 Update this section to include new information or data as necessary

1.3 Remove this section and place into an appendix with the supporting information

2.0 Hydrogeological Conditions

Update this section to include new information or data as necessary

3.0 Monitoring Systems

Maintain this as a descriptive narrative, place the sample collection protocols in the Monitoring program do not state protocols in more than one place

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4.0 GW Detection Monitoring

Update this section to include new information or data as necessary

5.0 Data Analysis...

See above

6.0 Air Quality Monitoring

Remove this section it is under the purview of the Bureau of Air Pollution Control

Figures

Update all figures to be current

Appendix A

Place Appendix A in the Design Report

Appendix D

Remove this in favor of an updated Facility Monitoring Plan

## II. Facility Operating Plan

### General Comments

**Remove the reference to consultants, counties and Federal Regulations (in all cases), Nevada is an authorized state.**

Remove all caveated statements like “in the unlikely event”, “the possibility is remote”, merely state what would occur in any event and what the response would be. Include in all plans a procedure for reviewing and updating the plans and procedures on a rotating basis including when an event occurs or the plan fails.

As this site will be the terminus for waste received from sources not within the state of Nevada please include a notification process for the origination facility/sites that details the waste acceptance criteria identified within the application and therefore the Permit. Specifically onsite personnel may not have knowledge of any particular shipment whether it is Construction & Demolition (C&D) or Municipal Solid Waste (MSW) or a “Special Waste”, accordingly the Lockwood facility would then be dependent upon the training and knowledge of the personnel at the point of origination. The waste handling and acceptance must be consistent with the requirements of the permit and application regardless of where the waste originates from.

The landfill will be effectively operated as two separate landfills at various times. As such all training, waste acceptance and levels of authority and training must reflect this. As such the NDEP has specific concerns related to the site and the impact this may have on the ability of response personnel (fire, medical, law enforcement) to respond in the event of an onsite incident and its concomitant impact on site personnel. Specifically, establishing site worker safety protocols will be paramount in the review process. The current plans are disconnected and may not provide the level of worker safety necessary due to the complexity of the site.

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By example please note that NAC 444.684(4) requires a specific “plan of action”, please provide a hierarchical system or list a series of specific steps taken in the event of an emergency. Please establish who or how a particular reaction (e.g. fire suppression) would be determined with level of responsibilities, gathering points, or evacuation routes etc. Accordingly the NDEP is, in accordance with NAC 444.641(1) and NAC 444.677(9), requiring the following.

Please incorporate all employee training, contingency plans, fire and emergency response, documentation of events and records into a single Integrated Sitewide Contingency Plan [ISCP] (guidance document outline enclosed). That captures the following:

- Fire Control Program
  - Equipment and Personnel
  - Contingency Plan
  - Training Program
1. The job title for each position at the facility related to waste management, and the title of the employee filling each job;
  2. A written job description for each position listed above. This description must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position;
  3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed above.
  4. Establish records that document that the training and ongoing training or job experience required above has been given to, and completed by, facility personnel.
  5. Establish a Sitewide Emergency Coordinator (with alternates) that has specific authorities to at a minimum;
    - Activate facility alarms or notification system for employee’s onsite
    - Notify local authorities as necessary
    - Activate the Integrated Sitewide Contingency Plan
    - Complete any other actions necessary to secure the site and ensure the safety of personnel

Documentation of arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of solid waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. If more than one police and/or fire department may respond to an emergency, agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority.

Further, if employees are to be required to engage in a fire fighting activity, or any other activity outside of the normal course of site operations, the training program must include this. The NDEP will not approve a plan that does not provide comprehensive training for employees for any activity they may be required to be perform both within and without the normal course of their duties.

If local authorities decline to enter into such arrangements, please document the refusal in the operating record.

#### Section

1.2 last paragraph, remove the reference to EPA, remove the word “...may” and replace with “will”. Rewrite this paragraph to be more precise.

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1.3 Any changes that affect the landfill as permitted will be submitted to the NDEP, approved and public noticed as required prior to implementation. Rewrite to reflect the regulatory criteria. Remove everything below this paragraph.

2.0 Remove this section

3.2.4 Remove the third paragraph and place in section 5, remove the last paragraph

4.2 List the equipment deployed at the site and rewrite to comply with NAC 444.684(1) and (4)(d).

5.1 Remove Aqueous Waste, liquid waste is restricted form landfilling.

What are "outdated products", is white waste/CFC Reclamation a Waste Stream?

5.2.3 Second paragraph, qualify the "field decisions" to be consistent with permitted activities. Third paragraph, the "Support Supervisor" is not identified in the listing of landfill personnel. Please include and identify level of authority, training etc.

Include in this section the following:

Reference the 40 CFR 262.34 requirements that include;

1. § 262.30 Packaging.
2. § 262.31 Labeling.
3. § 262.32 Marking.
4. § 262.33 Placarding.
5. § 262.34 Accumulation time

5.2.4

It is not necessary to reference Washoe County Waste Release permits as long as the accepted waste is consistent with the permitted wastes to be disposed of at the landfill. Remove this section.

5.3.2 All waste, inclusive of special wastes must have a sufficient amount of information associated with the waste stream to meet the requirement of NAC 444.737 in total.

5.3.2.1 Tires

Remove the first sentence. In accordance with NAC 444.652, the Division cannot approve the combination of two combustible waste streams (Tires and C&D material) within the same cell. For the requirement for C&D see the next comment. For the management of tires at the facility please resubmit a management plan for these for review and comment.

5.3.2.2 C&D

This section should be updated to incorporate new information. Please include a management plan that segregates the cells as required.

5.3.2.3 Tanks and Drums

Remove the first sentence. Any waste must be incorporated into the Waste Characterization Plan for the facility. There are no "exceptions" by the SWMA. Remove the second sentence and rewrite to say no hazardous wastes will be accepted at the landfill as required.

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5.3.2.5 Biohazardous Waste (Medical)

Rewrite this section to comply with NAC 444.646

5.3.2.6 Asbestos

Rewrite this entire section to comply with NAC 444.974 through NAC 444.976. Include Health and Safety References as necessary.

5.3.2.7 Incinerator Ash

There are no current regulations related to the disposal of Ash, please clarify.

5.3.2.11 Waste Oils

If all oils and anti-freeze are to be shipped offsite, please remove them from the waste streams to be disposed

5.3.2.12 Bio-Solids

Re-Write this section to include the requirements of NAC 444.646 and NAC 444.694, if it is to be used as Alternative Daily cover (ADC) Please describe the Alternative Daily Cover (ADC) in detail. Include a description of under what conditions ADC would and would not be used. Include only those things that will be used as ADC within the Application for approval. Also please provide some criteria for using and not using ADC, for example in inclement weather, high winds etc.

For the Class C biosolids there are no "prescribed permit conditions" please clarify.

5.3.2.13 Asphalt Grinder

Remove this section

5.4 Training Procedures

See General Comments

6.0 Cover

Update this section with new or updated information. Remove the paragraph on training and reference specific Training the Site wide Training program for that particular position.

7.0 Fugitive Dust

Remove this section it is within the purview of the Bureau of Air Pollution Control and rewrite to comply with NAC 444.696 Control of erosion and dust.

8.0 Landfill Gas and Odor

Remove sections 8.1, 8.2 and merely describe the Methane Monitoring Program (likely better placed in the Facility Monitoring Plan FMP).

Remove all references to the Air Permit.

Keep Sections 8.4.2 and 8.5. Move all this to the FMP

Move sections 8.6, 8.7 and 8.8 to the ISCP

9.0 Fire

Move this to the ISCP

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10.0 Vectors

10.1 Describe the methods of operation to control burrowing animals and to reduce the Lockwood Landfills attractiveness.

10.2 Remove the first paragraph

Section 11

Move this section to the FMP

Section 12

Update this section, please do not restate the regulations the Division is aware of them.

Section 13 H&S

Move this section to the ISCP

Figures

Update this section with new or updated information

Appendix 1-1

There is not permit in this section

Appendix 2-1 Emergency Plan

Incorporate this into the ISCP

*Integrated Site Wide Contingency Plan Outline  
Guidance Document*

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**1 Section I—Plan Introduction Elements**

- 1.1.1 Purpose and Scope of Plan Coverage
- 1.1.2 Table of Contents
- 1.1.3 Current Revision Date
- 1.1.4 General Facility Identification Information
- 1.1.5 Facility name
- 1.1.6 Owner/operator/agent (include physical and mailing address and phone number)
- 1.1.7 Physical address of the facility (include county, latitude/longitude, and directions)
- 1.1.8 Mailing address of the facility (correspondence contact)
- 1.1.9 Other identifying information
- 1.1.10 Key contact(s) for plan development and maintenance
- 1.1.11 Phone number for key contact(s)
- 1.1.12 Facility phone number(s)
- 1.1.13 Facility fax number

**2 Section II—Core Plan Elements**

- 2.1.1 Discovery
- 2.1.2 Initial Response
- 2.1.3 Procedures for internal and external notifications (i.e., contact, organization name, and phone number of facility emergency response coordinator, facility response team personnel, federal, state, and local officials)
- 2.2 Establishment of a response management system
  - 2.2.1 Procedures for preliminary assessment of the situation, including an identification of incident type, hazards involved, magnitude of the problem, and resources threatened
  - 2.2.2 Procedures for establishment of objectives and priorities for response to the specific incident, including:
    - 2.2.2.1 Immediate goals/tactical planning (e.g., protection of workers and public as priorities)
    - 2.2.2.1 Mitigating actions (e.g., discharge/release control, containment, and recovery, as appropriate)
    - 2.2.3.1 Identification of resources required for response
    - 2.2.4.1 Procedures for implementation of plan
    - 2.2.5.1 Procedure for mobilization of resources
    - 2.2.6.1 Sustained Actions
    - 2.2.7.1 Termination and Follow-Up Actions

**3 Section III**

**3.1 Facility and Locality Information**

- 3.1.1 Facility maps
- 3.1.2 Facility drawings
- 3.1.3 Facility description/layout, including identification of facility hazards and vulnerable resources and populations on and off the facility which may be impacted by an incident

**3.2 Notification**

- 3.2.1 Internal notifications
- 3.2.2 Community notifications
- 3.2.3 Federal and state agency notifications

**3.3 Response Management System**

- 3.3.1 General
  - 3.3.1.1.1 Closure due to Fire or Explosion

*Integrated Site Wide Contingency Plan Outline  
Guidance Document*

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- 3.3.1.1.2 Closure due to Inclement Weather
- 3.3.1.1.3 Closure due to Equipment
- 3.3.1.1.4 Closure due to Unforeseen Events
- 3.3.1.1.5 Closure due to Accident

**4 Scope and Applicability of the Site Health and Safety Plan**

**4.1 KEY PERSONNEL/IDENTIFICATION OF HEALTH AND SAFETY**

- 4.1.1 Key Personnel
- 4.1.2 Site Specific Health and Safety Personnel
- 4.1.3 Worksite Personnel
- 4.1.4 Organizational Responsibility
- 4.1.5 Visitors

**4.2 TASK/OPERATION SAFETY AND HEALTH RISK ANALYSIS**

- 4.2.1 Historical Overview of Site
- 4.2.2 Task by Task Risk Analysis
- 4.2.3 Task Hazard Descriptions
- 4.2.4 Site Walk Through

**4.3 PERSONNEL TRAINING REQUIREMENTS**

- 4.3.1 Preassignment and Annual Refresher Training
- 4.3.2 Site Supervisors Training
- 4.3.3 Training and Briefing Topics
- 4.3.4 Arrangements with local authorities

**4.4 PERSONAL PROTECTIVE EQUIPMENT TO BE USED**

- 4.4.1 Levels of Protection
- 4.4.2 Level A Personnel Protective Equipment
- 4.4.3 Level B Personnel Protective Equipment
- 4.4.4 Level C Personnel Protective Equipment
- 4.4.5 Modified Level D Personnel Protective Equipment
- 4.4.6 Level D Personnel Protective Equipment
- 4.4.7 Reassessment of Protection Program
- 4.4.8 Work Mission Duration
- 4.4.9 SOP for Respiratory Protection Devices
- 4.4.10 Cleaning and Disinfecting Self Contained Breathing Apparatus
- 4.4.11 SCBA Inspection & Checkout
- 4.4.12 SOP for Personal Protective
- 4.4.13 Inspection
- 4.4.14 Specific Levels of Protection Planned for the Site

**4.5 MEDICAL SURVEILLANCE REQUIREMENTS**

- 4.5.1 Baseline or Preassignment Monitoring
- 4.5.2 Periodic Monitoring
- 4.5.3 Site Specific Medical Monitoring
- 4.5.4 Exposure/Injury/Medical Support
- 4.5.5 Exit Physical

**4.6 SITE CONTROL MEASURES**

- 4.6.1 Buddy System
- 4.6.2 Site Communications Plan
- 4.6.3 Work Zone Definition

*Integrated Site Wide Contingency Plan Outline  
Guidance Document*

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- 4.6.4 Nearest Medical Assistance
- 4.6.5 Safe Work Practices
- 4.6.6 Emergency Alarm Procedure

**5 EMERGENCY RESPONSE/CONTINGENCY PLAN**

- 5.1.1 Pre-Emergency Planning
- 5.1.2 Personnel Roles and Lines of Authority
- 5.1.3 Emergency Recognition/Prevention
- 5.1.4 Evacuation Routes/Procedures
- 5.1.5 Emergency Contact/Notification System
- 5.1.6 Emergency Medical Treatment Procedures
- 5.1.7 Fire or Explosion
- 5.1.8 Spill or Leaks
- 5.1.9 Emergency Equipment/Facilities
- 5.1.10 Other Contingencies

5.2 SPILL CONTAINMENT PROGRAM

5.3 HAZARD COMMUNICATION

5.4 RECORD KEEPING

5.5 Incident Documentation

- 5.5.1 Post-Accident investigation
- 5.5.2 Incident history
- 5.5.3 Training and Exercises/Drills
- 5.5.4 Interaction with Local Emergency Services Personnel
- 5.5.5 Response Critique and Plan Review and Modification Process
- 5.5.6 Prevention

**6 Management of Hazardous Waste**

- 6.1.1 Compliance with 40 CFR 262.34 for the Management of Hazardous Waste