

## **F Security and Inspections [40 CFR 270.14(b)(4), (5), and (6)]**

### **F.1 Security [40 CFR 270.14(b)(4); 264.14]**

The regulated unit, a closed landfill (SWMU 1), was capped and closed according to an approved closure plan that was included in the revised RCRA Part B Permit Application submitted in July 1987. The closure plan was implemented and certified in 1988. The performance objective for the landfill cap is detailed in Section I. UCC is not attempting to demonstrate that security measures are not required in accordance with 40 CFR 264.14(a).

#### **F.1a Security Procedures and Equipment [40 CFR 270.14(b)(4); 264.14(b)]**

The UCC property is accessible by one vehicle entrance which is secured by a locked gate. Additionally, the closed landfill is enclosed by a chain-link steel fence that extends 6 feet above grade and is buried 2 feet below grade to limit burrowing animals. Figure 2 shows the two locked gates.

#### **F.1a(3) Warning Signs [40 CFR 270.14(b)(4); 264.14(c)]**

The fence surrounding the closed landfill (SWMU 1) at the facility has warning signs posted at each entrance gate and at approximately 300-foot intervals along the fence, which are legible from a distance of at least 25 feet and read "Danger – Unauthorized Personnel Keep Out."

### **F.2 Inspection Schedule [40 CFR 270.14(b)(5); 264.15]**

#### **F.2a General Inspection Requirements [40 CFR 270.14(b)(5); 264.15(a),(b); 264.33; 264.310]**

Post-closure inspection and maintenance requirements for the UCC closed landfill are included in Section I.2.

Under the current permit, UCC performs inspections of the landfill cover, drainage swales, fencing, groundwater monitoring wells, and corrective action equipment. A summary of the current and proposed frequencies is listed in Table 14. Table 15 is the proposed control plan. UCC proposes the following modifications to the current control plan:

- Monitoring well inspections will be conducted semiannually and will not include an additional inspection during the routine inspection activities. Little damage has been observed to monitoring wells, and semiannual inspections are sufficient to correct deficiencies.
- Inspection of the iSOC system will occur monthly while it is operating. If operation is discontinued, inspections will be discontinued. Section E.9d.2.2 contains a discussion regarding operation of the iSOC system.
- Inspection of the landfill cover for visual signs of damage and subsidence. If settlement or damage is observed, the cap will be repaired as needed.
- The landfill cells (within the fence) will be visually inspected for burrowing animals (e.g., gopher tortoise, armadillo). Burrows will be marked with flagging and traps will be set to capture these animals. Once captured, they will be relocated offsite. Burrows will be repaired as needed.
- The grass on the landfill cells will be visually inspected for non-seasonal die-off. An action plan will be developed to investigate and address non-seasonal grass die-off as needed.

- Groundwater monitoring and corrective action effectiveness reports will be submitted annually following annual groundwater monitoring as discussed in Section E.6b.9.

The closed landfill area will be monitored and maintained throughout the post-closure care period in accordance with the requirements of 40 CFR 264.15. The activities included in the schedule are sufficient to prevent a release of hazardous waste constituents to the environment and threats to human health and the environment. The proposed frequencies will identify and allow time to correct issues before they can harm human health and the environment.

UCC proposed to inspect the landfill cover, drainage swales, fencing, groundwater monitoring wells, and corrective action equipment as outlined in the revised control plan (Table 15). The landfill inspection criteria are summarized in Table 16. The inspections are sufficient to allow UCC to maintain the integrity of the cover and the groundwater monitoring system. Tables 14 and 16 detail activities, their frequency, how they are measured/observed, response triggers, responses, and documentation to be used. Example inspection forms used to implement the control plan (Table 15) are attached in Appendix H and consist of the following:

- UCC Landfill Inspection Log - iSOC System and Routine Inspections
- Post-Closure Quarterly Inspection Log – UCC Landfill Cells
- Monitoring Well Inspection Log

Qualified personnel will conduct the inspections. The inspections are described below, and example inspection forms are provided in Appendix H. Records of these inspections will continue to be maintained at the facility. 40 CFR 270.14(b)(5) and 40 CFR 264.15(b)(4) list or reference several regulations that do not have standards that are applicable to the facility, and these are described in the following table.

40 CFR Citation	Rationale
264.15(b)(5)	This section applies to performance track facilities. This facility is not a performance track facility.
264.33	As discussed in Section F.3, the emergency preparedness and prevention requirements of 40 CFR 264, Subpart C do not apply; therefore, this citation does not apply.
264.174	This section applies to container storage units. There are no container storage units at the facility.
264.193 and 195	This section applies to tank systems. No tank systems are present at the facility.
264.226	This section applies to surface impoundments. No surface impoundments are at the facility.
264.254	This section applies to waste piles. No waste piles are at the facility.
264.273 and 278	This section applies to land treatment units. No land treatment units are at the facility.
264.303	This section applies to actively operating landfills and does not apply. No leachate collection or leak detection system is operating at the facility. The inspection requirements for closed landfills included in 40 CFR 264.310 have been included in the post-closure care plan as described in Section I.2.
264.310 (b)(2) and (b)(3)	The landfill does not have leak detection or leachate collection systems; therefore, these requirements do not apply.
264.347	This section refers to incinerators. No incinerators are present at the facility.
264.602	This section applies to miscellaneous units. No miscellaneous units are present at the facility.
264.1033	This section applies to air emission standards for process vents. No process vents are at the facility.

40 CFR Citation	Rationale
264.1052, 1053, and 1058	This section applies to air emission standards for certain equipment that contact or contain hazardous waste. None of the listed equipment are present at the facility.
264.1083-1089	This section applies to air emissions from tanks, surface impoundments, and containers. None of these regulated units are present at the facility.

#### **F.2a.1 Types of Problems [40 CFR 270.14(b)(5); 264.15(b)(3)]**

The types of problems that could occur are included in Tables 15 and 16.

#### **F.2a.2 Frequency of Inspections [40 CFR 270.14(b)(5); 264.15(b)(4)]**

The frequency of inspections is included in Table 14.

#### **F.2a.3 Schedule of Remedial Action [40 CFR 264.15(c)]**

Remedial actions and repairs are performed to address problems identified during inspections. If the inspections detect problems that need corrective action, the corrective actions will be implemented immediately, if possible, and as soon as possible otherwise by subcontract services.

#### **F.2a.4 Inspection Log [40 CFR 264.15(d)]**

Inspection forms are included in Appendix H. Inspections include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. Documentation is maintained for 3 years from the date of inspections. In addition, inspection results, photographs, and any repair activities completed are compiled into reports which are submitted to the Georgia EPD as a corrective action effectiveness report included in the groundwater compliance monitoring report as detailed in Section E.9e.

### **F.3 Waivers and/or Documentation of Preparedness and Prevention Requirements [40 CFR 270.14(b)(6); 264.32(a)-(d)]**

UCC is requesting a waiver of preparedness and prevention requirements of 40 CFR 264, Subpart C. 40 CFR 264.30, the applicability section of Subpart C, refers to 40 CFR 264.1. 40 CFR 264.1(g)(3) states that, "A generator accumulating waste on site in compliance with §§262.14, 262.15, 262.16, or 262.17..." is not subject to the requirements of Part 264.

The facility has no active manufacturing. The facility no longer treats, stores, or disposes of hazardous wastes. However, one time in the previous 10-year period, hazardous waste was unexpectedly generated during an environmental investigation. When this occurred, waste was accumulated onsite in accordance with 40 CFR 262.16 and 262.17. No future generation of hazardous waste is planned or anticipated. Therefore, the requirements 40 CFR 264, Subpart C are not applicable.

#### **F.3a.3 Emergency Equipment [40 CFR 270.14(a); 264.32(c)]**

As discussed in Section F.3, this section is not applicable.

#### **F.3a.4 Water and Fire Control [40 CFR 270.14(a); 264.32(d)]**

As discussed in Section F.3, this section is not applicable.

**F.3a.5      Testing and Maintenance of Equipment [40 CFR 270.14(a); 264.33]**

As discussed in Section F.3, this section is not applicable.

**F.3c          Documentation of Arrangements with Emergency Agencies [40 CFR 270.14(a); 264.37]**

As discussed in Section F.3, this section is not applicable.

**F.3c.4      Document Agreement Refusal [40 CFR 270.14(a); 264.37(b)]**

As discussed in Section F.3, this section is not applicable.