

5.0 OPERATION PLAN

5.1 Introduction

The purpose of this section is to identify protocols for the overall operation and maintenance of the White Street Sanitary Landfill, which is owned and operated by the City of Greensboro. The landfill, which is located at the east end of White Street and is currently permitted to accept municipal solid waste generated within the City of Greensboro and Guilford County. This Plan has been prepared in accordance with Rule .1625 and provides details of the procedures and policies which currently are, or shall be, implemented throughout the life of the City of Greensboro's White Street Sanitary Landfill. Detailed drawings for each phase of the landfill's development are presented in the Operational Drawings for this Operational Plan. These Drawings illustrate the existing conditions of the landfill (including known limits of existing and previous disposal areas; and buffer zones), the fill phasing (including the progression of operation including daily operation, transition contours and final contours), and proposed final contours and erosion control plans (including storm water controls; and, stockpile and borrow operations).

5.2 Standard Operating Procedures

5.2.1 Hours and Days of Operation

The landfill is at present, and is anticipated to be, open for operation between the hours of 7:00 AM and 4:50 PM, Monday through Friday, and from 7:00 AM and 1:00 PM on Saturday. The landfill is normally closed on Sundays except where prior permission has been given to receive waste for special instances such as a natural disaster. The observed holidays are New Year's Day, Martin Luther King Jr. Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

Special notices are posted at the scalehouse advising users of observed holidays. Such notices are posted at least one week in advance of the holiday.

5.2.2 Traffic Routing

An entrance sign is posted stating the facility name, permit number, and operating hours. Additional signs are posted for allowable speed limit and directional signs indicating the location of the disposal area.

All trucks entering the landfill to dispose of solid waste are weighed at one of two (2) 70' x 10' inbound scales at the scalehouse. Regular users may not be weighed upon leaving if vehicle tare weights are known.

Automobiles and low-sided pickup trucks are required to weigh in. However, the Scale Attendant(s) controls access to the landfill to prevent abuse and misuse. A designated area at the fill face is set aside for these small vehicles to dispose of solid waste. This area is separated from the area being used by the City and private haulers.

Internal roads are hard surface or gravel and are maintained to be passable in all weather by all vehicles so that operation areas and units are accessible.

The total length of roadway from the entrance to the scales and from the scales to the disposal area will be approximately 1,400 feet. This provides sufficient queuing distance for trucks during the peak traffic periods.

Perimeter roads and operational access roads will be built to allow for 2-way truck traffic. The operational access road on the fill has been developed with branch roads extending from the exterior to the interior. A level area for truck turning will be maintained ahead of the active disposal area. The trucks come in via the access road, dump their load, turn around, and exit via the access road.

The approach to the working face is maintained such that two or more vehicles may safely unload side-by-side. A vehicle turn-around area large enough to enable vehicles to arrive and turn around safely with reasonable speed is provided adjacent to the unloading area. The vehicles back to a vacant area near the working face to unload. Upon completion of the unloading operation, the transportation vehicles immediately leave the working face area. Personnel direct traffic as necessary to expedite safe movement of vehicles.

5.2.3 Litter Control

Litter control is a prime requisite in the proper operation of the landfill. In order to control litter and windblown debris, the working face is kept as small as possible and waste is compacted soon after it is unloaded. Cover material is applied daily. If required, portable litter fences will be utilized downwind of and in close proximity to the working areas to catch blowing litter. The area around the work face and the property in general is routinely checked and the litter removed on a regular basis.

5.2.4 Odor, Dust, and Noise Control

Odors which emanate from solid waste as it is placed and compacted are generally limited to within a short distance of the working face. The covering of waste on a daily basis prevents odors from becoming a nuisance.

The access road from the scalehouse to the landfill unit is paved; all other service roads on the operating landfill are graded as necessary to maintain smooth, well-drained surfaces. During extended dry periods, operating roads may be sprayed with water to reduce dust problems. Regular maintenance of soil stockpiles, including frequent wetting or temporary seeding, serves to limit the generation of wind blown dust. Similarly, frequent wetting of on-site roads prevents truck traffic from creating dust.

Noise resulting from landfill equipment is limited to the period of time during operating hours. To reduce the nuisance of noise to neighbors or the administrative function of the landfill, a buffer of trees and other vegetation is maintained between the operating areas and other areas not designated for landfill operations. All on-site equipment is equipped with mufflers or similar noise-dampening devices. Equipment operators, drivers, and other operating personnel will be trained in the use of equipment in an effort to minimize noise generation. These efforts help to ensure that noise does not become a nuisance problem to neighbors or to the administrative function of the landfill.

5.2.5 Inclement Weather Operations

During periods of heavy rainfall, the work area is kept as close to the landfill service roads as practical.

5.2.6 Personnel Structure

Responsibility for overall facility management and operation rests with the Landfill Manager. This individual is designated as the contact person for matters related to regulatory compliance, and is responsible for providing adequate personnel and equipment in order to operate the facility in accordance with the approved permit documents and the North Carolina Solid Waste Management Rules and Solid Waste Management Law.

Landfill supervisory staff includes the Landfill Manager, the Landfill Supervisor, and the Scalehouse Supervisor. In addition to the supervisory staff, the City has twelve other permanent staff available for operations at the landfill. These staff positions include a two person environmental staff that oversees waste screenings, load inspections, groundwater wells maintenance, and methane gas monitoring.

The Scale Attendant(s), stationed at the scalehouse at the site entrance, is responsible for maintaining complete and accurate records of vehicles and visitors entering and leaving the facility. The Scale Attendant(s) also visually inspects incoming vehicles to the extent that the loads are covered properly and determines if the load is acceptable.

An equipment operator doubles as a truck spotter directs incoming vehicles to the proper location to unload refuse at the working face. The primary function of the spotter is to prevent unloading in areas that are not designated for disposal and to visually inspect all loads as they are dumped to assure compliance with posted operating rules. A traffic controller is located at the working face to direct vehicles to the location where the waste is to be unloaded.

Equipment operators are responsible for the safe operation of site equipment. As the personnel most closely involved with the actual landfill operation, these employees are responsible for identifying any potentially dangerous conditions, monitoring waste for unauthorized or hazardous materials, as well as careless or improper actions on the part of other persons while on the premises, and reporting such observations immediately to the Landfill Supervisor and the environmental specialist. Other services such as sediment basin maintenance, construction, site clean-up, etc. may be contracted to outside firms on a temporary basis.

5.2.7 Personnel Training

The Landfill Manager and the Landfill Supervisor are both Certified Managers of Landfill Operations (MOLO) by the Solid Waste Association of North America (SWANA) as required by GS 130A-309.25. In addition to trained supervisory staff, each landfill employee goes through a 10-hour training course (led by supervisory staff) and is certified by SWANA as Landfill Operations personnel. These staff are then recertified on an annual basis. As part of this training, personnel learn to reorganize loads which may contain regulated hazardous waste or wastes containing PCB's. Landfill personnel are all trained in safety procedures for fire fighting, first aid, CPR, and the handling of hazardous materials.

5.2.8 Management Authority

The management authority, or chain of command for decisions regarding landfill operation is depicted in Figure 5-1.

5.2.9 Equipment Requirements

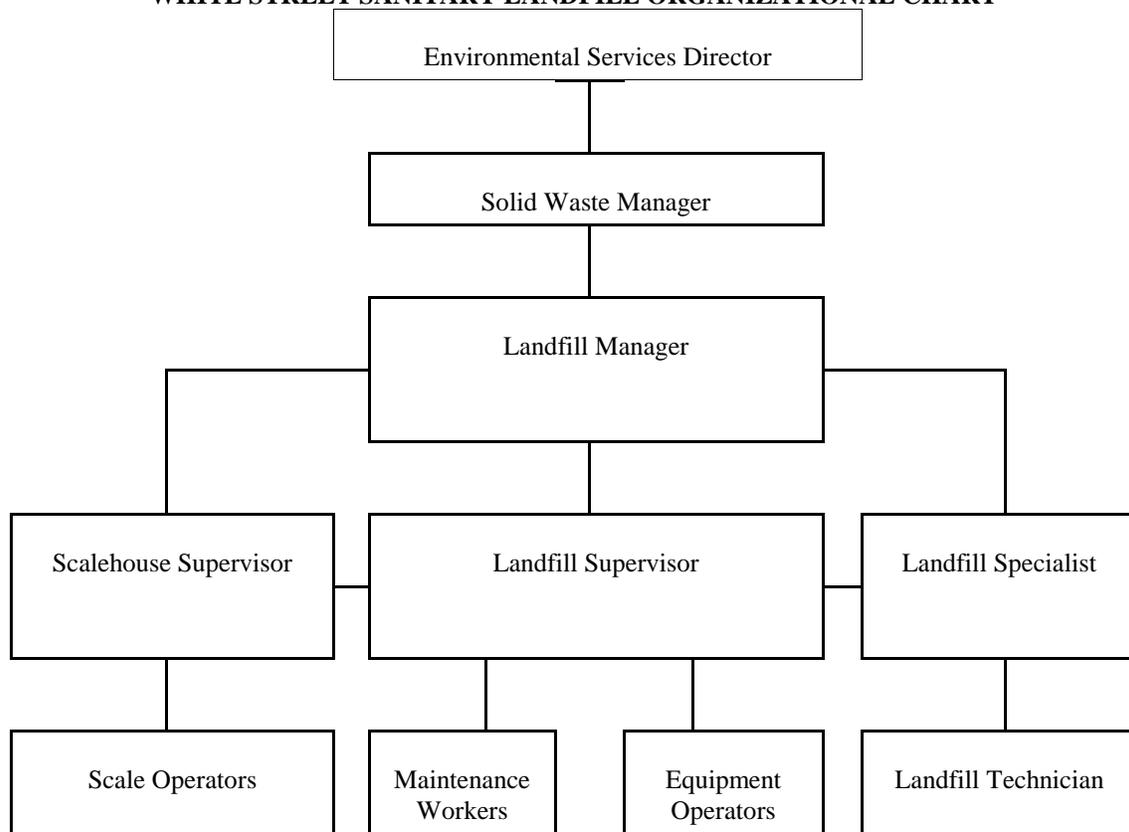
Equipment requirements may vary in accordance with the method or scope of landfill operations at any given time. Additional or different types of equipment may be provided as

necessary to enhance operational efficiency. The types and sizes of equipment currently in use at the White Street Sanitary Landfill are presented in Table 5-1.

5.3 Waste Screening Programs

In order to assure that prohibited wastes are not entering the landfill facility, screening programs have been implemented at the White Street Sanitary Landfill. Waste received at both the scalehouse entrance and waste taken to the working face is inspected by trained personnel. These individuals have been trained to spot indications of suspicious wastes, including: hazardous placarding or markings; liquids; powders or dusts; sludges; bright or unusual colors; drums or commercial size containers; and "Chemical" odors. Screening programs for visual and olfactory characteristics of prohibited wastes are an ongoing part of the landfill operation. These programs are implemented in accordance with Rule .1626 Part (1) (f).

**FIGURE 5-1
CITY OF GREENSBORO
WHITE STREET SANITARY LANDFILL ORGANIZATIONAL CHART**



5.3.1 Waste Receiving and Inspection

All vehicles must stop at the scalehouse located at the entrance of the landfill facility and visitors are required to sign-in. All refuse transportation vehicles are weighed and the content of the load assessed. Any materials which pose health hazards, cause fire, or which could impact negatively on the environment are deemed unacceptable. The Scale Attendant(s) requests from the driver of the vehicle entering the landfill a description of the waste it is carrying to ensure that unacceptable waste is not allowed into the landfill. The Attendant(s) then visually checks the vehicle as it crosses the scale. Signs are conspicuously posted informing users of the acceptable and unacceptable types of waste.

TABLE 5-1			
CITY OF GREENSBORO, WHITE STREET SANITARY LANDFILL			
CURRENT EQUIPMENT INVENTORY			
Description	Make/Model	No.	Comment
Landfill Compactor	826C Cat	3	
Bulldozer	D8N Cat	2	
Grader	140G Cat	1	
Loader	WA250-1 Komatsu 1994 FR20B Fiat Allis	1 1	
Earthmover	627E Cat	2	
Excavator	K916LC-2 Kobelco	1	
Tractor	White	1	w/Lowboy Trailer
Dump Truck	D400D Cat	3	Off Road
Other Trucks	F250D HD Ford 1994 C70 Chevrolet 2500 Chevrolet 1989	1 1 1	Fuel Truck Maint.
Other (specify):	900 Ford Cheyenne 1993 Chevrolet Ford 8000 Kubota L275 John Deere 2355 Toro Kawasaki Mule	1 1 1 1 1 1 1	Water Truck Maint. Maint. Utility Tractor w/Mower Lawn Mower Utility vehicle

Each day trucks hauling commercial and industrial loads of waste are selected for screening at random on an appropriate percentage basis. Selected vehicles are directed to a lined area separate from the working face where the vehicle will be unloaded. Waste is carefully spread using suitable equipment. An attendant trained to identify wastes that are unacceptable at the landfill inspects the waste discharged at the screening site.

If waste is detected which is suspected to be unauthorized liquid waste (liquids in containers or non-bulk/non-containerized liquids other than household wastes), the attendant will perform a paint filter test on a sample of the suspect waste. The paint filter test will be performed as follows:

- a 100 milligram sample of waste will be placed in a conical, 400 micron paint filter;
- if liquid passes through the paint filter in five minutes, the conclusion that the waste contains free liquid will be made.

If unacceptable waste is found, including wastes generated from outside of Guilford County, the load will be isolated and secured by berming off the area. The Landfill Manager will then notify the following official of the North Carolina Department of Environment, Health, and Natural Resources, Division of Solid Waste Management within 24 hours of attempted disposal of any waste the landfill is not permitted to receive in order to determine the proper course of action (it should be noted that the hauler is responsible for removing unacceptable waste from the landfill property):

Waste Management Specialist
585 Waughtown Street
Winston-Salem, NC 27107
(910) 771-4600

The following records are kept on-site to document all inspections:

- The date and times wastes were received for inspection
- Source and type of wastes
- Vehicle and driver identification
- All observations made by the inspector
- Final disposition of waste after inspection

5.3.2 Prohibited Waste Types

The following wastes are prohibited from disposal within a municipal solid waste landfill (MSWLF) unit:

- Whole Scrap Tires
- Used Oil
- White Goods
- Lead Acid Batteries
- Yard Trash
- Asbestos Waste

In addition, operating criteria prohibit other materials from disposal at the MSWLF unit. These criteria address the following types of waste:

- Hazardous waste as defined within 15A NCAC 13A, including hazardous waste from conditionally exempt small quantity generators.
- Polychlorinated biphenyls (PCB) wastes as defined in 40 CFR 761.
- Bulk or non-containerized liquid wastes unless the waste is household waste other than septic waste and waste oil; or the waste is leachate or gas condensate derived from the MSWLF unit, whether it is a new or existing MSWLF unit or lateral expansion, is designed with a composite liner and leachate collection system.
- Containers holding liquid wastes unless the container is a small container similar in size to that normally found in household waste; the container is designed to hold liquids for use other than storage; or the waste is household waste.
- Wastewater treatment sludges unless they are used as a soil conditioner and incorporated or applied to the vegetative growth layer (at a depth no greater than six inches).

5.3.3 Hazardous Waste Contingency Plan

In the event that identifiable hazardous waste or waste of questionable character is discovered at the landfill, the following procedure shall be instituted immediately:

- The employee that discovers the waste shall see that all personnel, customers, and visitors are evacuated a safe distance upwind from the waste.
- Notify the Landfill Manger, Supervisor, and Landfill Specialist.
- Keep all personnel at a safe distance and maintain security until the Manager, Supervisor,

- or Specialist arrives and assumes command.
- In the event the waste presents a hazard to human health or the environment, the City of Greensboro Fire Department will be notified and a response by the Hazardous Materials Team requested.
- Notify the Manager of the City Solid Waste Management Division and the Director of the Department of Environmental Services.
- As soon as adequately trained personnel with the proper protective equipment are available, appropriate measures shall be taken to contain the waste and prevent additional contamination.
- Notify the NC DEHNR Division of Solid Waste Management.

If the vehicle disposing of such waste is known, attempts shall be made to prevent that vehicle from leaving the site or, if the vehicle has left the site, notice will be served on the owner of the vehicle that waste for which it has responsibility has been improperly disposed of at the landfill.

Any unauthorized wastes will be removed from the landfill and, if possible, back onto the transporter's vehicle. If the waste cannot be returned to the transporter's vehicle, it will be isolated from the remaining waste and contained to the extent possible. If needed, the waste will be covered with either on-site soils or other tarping material until such time when an appropriate method can be implemented to properly handle the waste. The cost of the removal and disposing of the waste shall be charged to the owner of the vehicle involved. Any vehicle owner or operator who knowingly dumps unacceptable waste in the landfill may be barred from using the landfill and may face prosecution.

Should an incident where prohibited waste is found at the landfill occur, the event shall be documented as follows:

- Date and time of material detection
- Hauler name (company and driver)
- Material(s) detected
- Material generator(s) if able to identify
- Action(s) taken to manage or return material(s)
- Efforts taken if extreme toxicity or hazard was discovered
- Landfill employee in responsible charge

5.4 Waste Disposal

Solid waste transportation vehicles arrive at the working face at random intervals. There may be a number of vehicles unloading waste at the same time, while other vehicles are waiting. In order to maintain control over the off loading of waste, a certain number of vehicles are allowed on the working face at a time. The actual number is determined by the truck spotter. This procedure is used in order to minimize the potential of off loading non-acceptable waste and to control disposal activity.

Operations at the working face are conducted in a manner which will encourage the efficient movement of transportation vehicles to and from the working face, and to expedite the unloading of solid waste.

Solid waste unloading at the landfill is controlled to prevent disposal in locations other than those specified by site management. Such control is also used to confine the working face to a minimum width, yet allow safe and efficient operations. The width of the working face is maintained as small as practical in order to maintain the appearance of the site, control windblown waste, and minimize the amount of cover soil required each day. Normally, only one working face is active on any given day, with all deposited waste in other areas covered by either daily, intermediate cover or final cover, as appropriate.

Other services such as sediment basin maintenance, construction, site clean-up, etc. may be contracted to outside firms on a temporary basis.

The sequence of fill will proceed uphill from the low end, subcell by subcell. Using multiple lifts allows filling to occur uniformly across the subcells, eliminates depressed areas and facilitates movement of storm water off site. Less extreme elevation differences occur during construction when using multiple lifts. Waste disposal activities are expected to start in the northeastern corner and progressing south and west across the cells.

All putrescible solid waste delivered to the working face, such as spoiled foods, animal carcasses, abattoir waste, hatchery waste, and other animal waste, is covered immediately. Asbestos waste is not accepted at the landfill.

Use of portable signs with directional arrows and portable traffic barricades facilitates the unloading of wastes to the designated disposal locations. These signs and barricades are placed along the access route to the working face of the landfill or other designated disposal areas which may be established.

5.5 Spreading and Compacting

The procedures for the placement of waste in the landfill include the unloading of trucks, checking of waste for fire, the even spreading of waste, and compaction using the landfill compactor equipment in layers not to exceed eighteen inches in depth. These layers are applied to construct a lift of approximately ten (10) feet in depth after compaction. The level of compactive effort should be sufficient to produce a waste cohesion volume of 300 pounds per square foot. Cover material will be placed over the compacted waste at the end of each day. The size of the working face where unloading, spreading, and compacting takes place will be limited to allow for the most efficient use of cover material.

5.6 Cover Requirements

A significant volume of soil is required to provide for the cover requirements of the White Street Sanitary Landfill. In order to provide for these requirements, on-site borrow areas are excavated in stages to keep pace with the demand for soil. The borrow areas are located south of the entrance road.

During normal operations material is excavated, loaded, hauled and then placed over the waste. The development of large stockpiles which result in double handling of materials is avoided. However, stockpiling of material may be necessary prior to the winter when excavating materials is more difficult due to colder, wetter weather. Off-site soil or alternative cover may be used to reduce the on-site requirements for soil cover.

5.6.1 Daily Cover

In accordance with Rule .1626 (2)(a) disposed solid waste is covered with six inches of earthen material at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging.

The City plans to use either soil or an approved alternative cover on a daily basis. This alternate cover may be used on a daily. On weekends and holidays the lift face will be covered with six inches of compacted soil.

The White Street Sanitary Landfill has an adequate quantity of acceptable earth cover for routine operations.

5.6.2 Intermediate Cover

Intermediate cover consisting of a total thickness of twelve inches is applied to all areas which will not have wastes placed on them for 12 months or more, but where final termination of disposal operation has not occurred. The areas which have received intermediate cover are graded to prevent ponding and temporary grass cover is planted. Any erosion or other damage which has occurred to the intermediate cover is repaired on a routine basis. Litter fences are installed to reduce blowing litter.

5.7 Disease Vector Control

The need for extensive disease vector control (control of rodents, flies, mosquitoes, or other animals, including insects, capable of transmitting disease to humans) is minimized through proper site operation, including on-going compaction and application of daily and final cover. If vector problems develop that require control beyond the measures indicated above, appropriate measures will be taken.

5.8 Explosive Gases Control

Landfill gases are the product of solid waste decomposition under anaerobic conditions. The quantity and types of gas generated depend on the type of waste disposed of. The largest amount of gas generated is generally from waste containing a high percentage of readily degradable organic matter. The rate of generation depends mainly on the moisture content, temperature, and particle size of the waste and the age of the fill. High temperature and moisture content, along with small particle size, tend to result in higher gas production. Gas production from a landfill can last from two to 100 years, but generally peaks after approximately five years, if the moisture content is not limited. Landfill gases predominately consist of methane and carbon dioxide. Initially, the gas is mostly carbon dioxide with methane production beginning later; however, the gas eventually reaches approximately 50% methane by volume.

A gas monitoring system will be constructed along the perimeter of the landfill. This system will be monitored with a mobile combustible gas indicator (CGI) to check for gas migration along the perimeter of the landfill nearest any residential structures. All buildings and enclosed structures on the landfill are monitored as part of a routine methane monitoring program. Routine monitoring for gas migration is performed in accordance with Rule .1626 Part (4)(b) on a quarterly basis to ensure that the following compliance levels for methane concentration are not exceeded: 1) the concentration of methane gas generated by the facility does not exceed 25% of the lower explosive limit (LEL) for methane in facility structures (1.25% methane); and 2) the concentration of methane gas migrating from the landfill does not exceed the LEL for methane at the facility property boundary (5% methane).

If concentrations are measured at greater than 25 percent of the LEL for methane in facility structures then the City will immediately take all necessary steps to ensure protection of human health and shall notify the Division of Solid Waste Management. Within seven days of detection, the methane gas levels detected and a description of the steps taken to protect human health shall be placed in the operating record. Within sixty days of detection, a remediation plan describing the nature and extent of the problem and the proposed remedy for methane gas releases shall be placed in the operating record, the remediation plan shall be implemented, and the Division of Solid Waste Management shall be notified that the remediation plan has been implemented.

5.9 Air Criteria

In accordance with the State Implementation Plan developed under the Clean Air Act Section 110, open burning is prohibited at the site, unless approved by the Division for the infrequent burning of

land clearing debris generated on site or debris from emergency clean-up operations. In order to control accidental fires from occurring at the site, the following preventative measures have been taken:

- The Scale Attendant(s) and equipment operators screen incoming waste loads for signs of hot loads, such as smoke, steam or heat being released from the waste, in order to prevent such loads from being off-loaded in the active area of the landfill.
- Smoking is confined to designated areas only, away from active areas of the landfill, fuel stations, methane collection and treatment equipment and other fire-sensitive areas.
- Motorized equipment is not parked near fuel stations longer than necessary for refueling.
- Fuel spills are contained by berming and cleaned up immediately using some type of absorbent material.
- Landfill equipment does not remain in the active area of the site overnight.
- Dead trees, brush, or vegetation adjacent to the landfill are removed immediately, and grass and weeds mowed so that brush fires cannot spread to the landfill. A mower/shredder is available to control grass and brush.

Fire fighting equipment is available on-site to control fires should they occur. In addition, all equipment is equipped with automatic fire extinguisher systems and all landfill personnel have been certified in CPR as of July 1, 1995. In the event that additional fire protection be needed, the City of Greensboro Fire Department will be contacted immediately to provide fire-fighting services. The Division of Solid Waste Management will be notified verbally within 24 hours of any fire occurrence at the landfill, and written notification shall be submitted to the Division within 15 days of the fire incident.

5.10 Access and Safety Requirements

Entry to the site is limited to landfill personnel, approved waste haulers and properly identified persons whose entry is authorized by the site management. The City reserves the right to restrict access to the site. Visitors may be allowed near the active area only when accompanied by a site representative.

An entrance sign is posted stating the facility name, permit number and operating hours. Additional signage regulates traffic flow, provides information on dumping procedures, the type of waste the facility is permitted to receive as well as those wastes banned from disposal at the facility, and indicates the location of the disposal area.

Facility roads are maintained to be passable to ensure that all operation areas and units are accessible in all weather conditions. Dust control measures, including wetting or temporary seeding of soil stockpiles and wetting of on-site roads, are implemented when necessary.

All facilities are surrounded on all sides by natural barriers, fencing, or an equivalent means of controlling vehicular access and preventing illegal disposal. All access is limited by gates, and such gates are securable and equipped with locks.

Scavenging is not permitted at the landfill. If the volume of salvageable goods is sufficient, those items are set aside for salvage disposal by the City of Greensboro; however, under no circumstances are goods to be salvaged from the working face. Items stockpiled for possible salvage are maintained in a neat and orderly fashion.

Barrels and drums are not be disposed of unless they are empty and perforated sufficiently to ensure that no liquid or hazardous waste is contained therein, except fiber drums containing asbestos.

5.11 Sedimentation and Erosion Control

The landfill will be constructed with maximum 4:1 side slopes and minimum 12.5:1 top slopes to promote runoff and prevent ponding over or in the waste. Perimeter drainage channels at the toe of the slope will provide runoff, erosion, and sediment control. The drainage channel allows for the movement of surface water from landfilling activities and provides a settling zone for sediments carried from the site. The channel is constructed to allow drainage via sediment basins through natural outfalls to North Buffalo Creek. In addition to the drainage channel, sediment basins, silt fences, slope drains, and sediment traps, temporary and permanent seeding will be used to mitigate sedimentation and erosion control problems. All measures will be constructed or installed in accordance with standards specified in the North Carolina Erosion and Sediment Control Planning and Design Manual.

Sediment basins will also prevent the discharge of pollutants that violate requirements of the Clean Water Act, including, but not limited to, NPDES requirements, into the waters and wetlands of the United States.

The landfill will have a comprehensive surface and groundwater monitoring program to provide early detection of any leachate migration problems. In the event any constituents are detected above allowable limits, measures will be taken to begin assessing the extent of contamination and, if necessary, corrective actions will be taken to prevent the pollution of waters and wetlands of the United States, that violate any requirements of an area-wide or state-wide water quality management plan that has been approved under Section 208 or 319 of the Clean Water Act, as amended.

5.12 Drainage Control and Water Protection Requirements

The landfill will be constructed with 4:1 side slopes and 12.5:1 top slopes to promote runoff and prevent ponding over or in the waste. Perimeter drainage channels at the toe of the slope provide runoff, erosion, and sediment control. Sediment basins will also prevent the discharge of pollutants into the waters of the United States, including wetlands, that violates any requirements of the Clean Water Act, including, but not limited to, NPDES requirements.

The landfill has a comprehensive surface and groundwater monitoring program to provide early detection of any leachate migration problems (see Section 11.0). In the event any constituents are detected above allowable limits, measures will be taken to begin assessing the extent of contamination and, if necessary, corrective actions will be taken to prevent the pollution of waters of the United States, including wetlands, that violate any requirements of an area-wide or state-wide water quality management plan that has been approved under Section 208 or 319 of the Clean Water Act, as amended.

5.13 Leachate Management

The leachate collection system will be inspected annually to determine if clean-out of the lines is required. Any unusual fluctuation in leachate quantity or incident affecting the collection system will also trigger a complete inspection of the system. Records will be kept indicating any maintenance performed on the system and all associated test results. Leachate samples will be obtained semi-annually from the pump station for quality analysis. These results will be forwarded to the treatment plant operator and maintained on-site for regulatory review. Provisions will be made for hauling leachate by truck should that become necessary. The tank's final sizing will be determined by the allowable discharge rate into a POTW pipeline and a minimum of one week emergency capacity. The emergency capacity is to account for repairs to system pumps of discharge lines. The plan will be revised after any unexpected condition to reflect the appropriate action in the event of a recurrence.

5.14 Record Keeping

The City of Greensboro maintains detailed records of all activities relating to the landfill. These records are either kept on site or at the office of the City's Public Works Department and include: types and quantities of waste received; source of waste received; revenue generated from waste received; applications for industrial waste disposal and related analyses; well water usage; results from surface and groundwater monitoring, landfill gas monitoring; leachate quantity and quality results; correspondence from regulatory agencies; accident reports; and reports of site and random load inspections. Table 5-2 provides a summary of the records kept, their frequency of completion, and the locations where the records are maintained.

TABLE 5-2 CITY OF GREENSBORO WHITE STREET SANITARY LANDFILL RECORD KEEPING		
Type of Record	Frequency of Completion	Location Maintained
Waste quantities received	Daily	Landfill
Source of waste received	Daily	Landfill
Revenue from waste received	Daily	Landfill
Industrial waste applications and analyses	Before initial waste disposal and annually thereafter	Landfill
Well water usage	Daily	Landfill
Surface and groundwater monitoring data	Semi-annually	Landfill
Related correspondence	As received	Landfill
Accident reports	After each occurrence	Landfill
Site inspections	Daily, quarterly, annually	Landfill
Results of random waste load inspections	After each inspection	Landfill
Gas monitoring results	Quarterly	Landfill
Leachate quality	Semi-annually	Landfill
Leachate quantity	Monthly	Landfill
Closure/ Post Closure estimate	Annually	Landfill