U.S. Steel – Midwest Plant Greenbelt II Landfill INR000109017 Attachment F

Attachment F Procedures to Prevent Hazards

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F. PROCEDURES TO PREVENT HAZARDS

F-1 Security

The permittee complies with the requirements of 40 CFR 270.14(b)(4) through (9) and 329 IAC 3.1-13-1.

F-1a Security Procedures and Equipment

Unless a waiver is granted, the facility must have either a 24-hour surveillance system or a barrier and a means to control entry. The permittee presently employs a 24-hour surveillance system and barrier as a means to control entry.

F-1a(1) <u>24-Hour Surveillance System</u>

Entry to the Midwest Plant property, and therefore to the landfill area, is controlled on a 24-hour basis by uniformed guards.

F-1a(2) Barrier and Means to Control Entry

A 6-foot high chain link fence with various gates surrounds the Greenbelt II Landfill. The fence and gates for the Greenbelt II Landfill are inspected for holes, deterioration, and general integrity in accordance with the inspection schedule discussed below in Section F-2.

One or more uniformed guards are present at the main facility entrance on a 24-hour basis as a means to control entry of unauthorized individuals. The secondary facility entrance on the east side of the Plant is equipped with an electronic gate. As discussed above, a six-foot chain link fence surrounds the Greenbelt II Landfill. The Greenbelt II Landfill fence is equipped with several access gates. Only one gate is used for active access during routine operations. The other gates are locked as a means to control entry. Only authorized personnel will be allowed access through the gates, and thus access to the Greenbelt II Landfill entrance gate. As a further means to control entry to the Greenbelt II Landfill, identification and warning signs are posted at the active access gate.

F-1a(3) <u>Warning Signs</u>

In accordance with 40 CFR 264.14(c) and 329 IAC 3.1-13-1, warning signs are posted at gates to the Greenbelt II Landfill, and at other locations on the fence surrounding the Greenbelt II Landfill in sufficient numbers to be seen from any approach to the active portion. The warning signs are in English and legible from a distance of 25 feet.

F-1b Waiver

A waiver of the security procedures and equipment requirements is not being requested by the permittee. Therefore, sections F-1b(1) and (2) are not applicable.

F-1b(1) Injury to Intruder

Not applicable.

F-1b(2) <u>Violation Caused by Intruder</u>

Not applicable.

F-2 Inspection Schedule

F-2a General Inspection Requirements

A facility inspection schedule has been developed for the Greenbelt II Landfill in accordance with 40 CFR 264.15 and 264.303. The inspection schedule has been developed to verify proper operation of equipment that is vital to prevent, detect, or respond to environmental and human health hazards. The frequency of inspections is as follows:

Table F-1

Inspection Type	Inspection Frequency	Types of Problems to Inspect
Weekly/After Storms Inspection	Weekly/After Storms	See Figure F-1
F006 Waste Transport	Daily (when in use)	See Figure F-2
Inspection		
Leak Detection System (LDS)	Weekly	See Figure F-3
Leachate Inspection		
Semi-Annual Inspection	Semi-Annual	See Figure F-4
Post-Closure Inspection	Semi-Annual (after final	See Figure F-5
	closure of all cells)	

Inspection Frequency

The inspection schedule and inspection records are retained at the facility. Note that the attached inspection forms are only samples and may be modified, so long as the information required in 40 CFR 264.15 or 264.303 is provided.

Groundwater monitoring wells, piezometers and sampling equipment will be regularly inspected in accordance with the procedures described in Attachment E. Specifically, a Groundwater Inspection Checklist has been developed as Exhibit 5 to the Groundwater Sampling and Analysis Plan (SAP) in Appendix E-6.

F-2a(1) <u>Types of Problems</u>

The types of problems to be inspected are presented on the applicable inspection forms (**Figures F-1** through **F-5**).

The types of problems that might occur related to the groundwater monitoring network are presented on Exhibit 5 in the Groundwater SAP. Issues such as faded or missing well identification, broken well casings, debris or vegetation on top of the concrete surface pads, severely cracked concrete pads, or other observations will be identified and corrected if the issue has the potential to compromise the integrity of the groundwater monitoring system and impacts the ability of the monitoring wells to yield representative groundwater samples.

F-2a(2) Frequency of Inspections

The frequency of the various required inspections is shown in **Table F-1** above. The frequency of inspections is based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. By the nature of the operation and the waste material involved, it is unlikely a condition involving deterioration of equipment, malfunction or operator error would result in an environmental or human health incident.

The frequency for conducting groundwater monitoring well, piezometer, and sampling equipment inspections is semi-annual, which coincides with the schedule for routine groundwater monitoring (see Attachment E of the Permit). Attachment E includes a Semi-Annual Groundwater Inspection Checklist that lists specific items to be assessed during the inspection of the groundwater monitoring wells and piezometers.

F-2b Specific Process Inspection Requirements

F-2b(1) Container Inspection

Because this Permit pertaining to the Greenbelt II Landfill does not include hazardous waste storage in containers, Section F-2b(1) is not applicable.

F-2b(2) <u>Tank Inspection</u>

A 750,000 gallon double walled storm water surge tank has also been installed to temporarily contain excess contact storm water prior to treatment at the Chrome Treatment Plant. When needed, excess storm water is pumped to the surge tank, temporarily held for 24 to 48 hours, and

then released in a controlled fashion via gravity and routed to the Chrome Treatment Plant for treatment. The tank is inspected daily, when the tank is in use.

F-2b(3) <u>Waste Pile Inspection</u>

Because the Permit pertaining to the Greenbelt II Landfill does not include hazardous waste storage in waste piles, Sections F-2b(3)(a) through (c) are not applicable.

F-2b(4) Surface Impoundment Inspection

Because the Permit pertaining to the Greenbelt II Landfill does not include hazardous waste storage or disposal in a surface impoundment, Sections F-2b(4)(a) through (c) are not applicable.

F-2b(5) Incinerator Inspections

Because the Permit pertaining to the Greenbelt II Landfill does not include hazardous waste treatment using an incinerator, Sections F-2b(5)(a) through (b) are not applicable.

F-2b(6) Landfill Inspection

While the Greenbelt II Landfill is in operation, it will be inspected weekly and after storms to detect evidence of the following:

- 1. Deterioration, malfunctions, or improper operation of run-on and run-off control system;
- 2. Proper functioning of wind dispersal control systems, where present; and
- 3. The presence of leachate in and proper functioning of leachate collection and removal systems.

F-2b(6)(a) Run-on and Run-off Control System

The contact water collection pipe to the Greenbelt II pumphouse and transport pipeline, which are part of the NPDES-permitted wastewater treatment system, will be inspected weekly and after storms to ensure that obstructions to flow do not exist and that runoff is properly channeled and contained. Should evidence of contact water leakage or obstructions be found during the inspection, the inspector will assess the situation, take appropriate steps to correct it, and document actions taken to correct observed deficiencies. The non-contact runoff perimeter collection pond is inspected weekly and after storms during the active life of the landfill. The slopes are inspected for the formation of erosion gullies, and documented.

Run-on is generally not a concern because the landfill is positioned above surrounding grades. Also, the well-draining natural sandy soils surrounding the landfill do not promote ponding of water. Therefore, although a pond is part of the landfill design, it rarely holds standing water because the infiltration rate typically will exceed normal rates of precipitation.

F-2b(6)(b) Wind Dispersal Control System

Although fly ash used for solidification is not considered a hazardous waste, the following procedures will be implemented to manage wind dispersal of fly ash used during sludge solidification events. These measures are designed to minimize the potential for fly ash migrating beyond the permittee's property boundary. Such dispersal has the potential to occur during fly ash off-loading and/or solidification operations. Means to control wind dispersal of fly ash will include the following:

- 1. Only one truck will be off-loaded at a time;
- 2. Fly ash operations, including off-loading and solidification, will not occur on days with excessive wind gusts that could lead to migration of fly ash beyond the property boundary. If wind conditions result in fly ash migrating beyond the property boundary, then fly ash operations will be suspended;
- 3. Significant volumes of fly ash will not be stockpiled. The term "significant" is intended to include no more than a daily volume of fly ash needed to conduct solidification operations. Typically, a daily quantity of solidification agent is hauled to the site for each day's solidification activities. The amount delivered for one day of mixing typically ranges from 6 to 12 truckloads. Flexibility to temporarily stage small quantities of fly ash (i.e., less than the daily volume needed) will allow fly ash to remain on-site if operations needed to be unexpectedly suspended because of high winds. In the event of a shutdown, if there are remaining loads of fly ash or lime kiln dust, they will be flattened to help control wind dispersal until operations recommence; and
- 4. Under extreme dry conditions, roads will be watered to reduce dust.

If waste (i.e., sludge) has the potential to be wind dispersed beyond the open portion of the Greenbelt II Landfill (on to or beyond the interim or final cover, whichever is closer to waste), wind dispersal controls will also be initiated. These control measures may include wetting the sludge and fly ash during solidification activities.

The above measures will also be employed, as needed to control dust migration beyond the property boundary if other materials, such as solid wastes, SWMU wastes, and other remediation wastes are disposed in the landfill.

F-2b(6)(c) Leachate Collection and Removal System

In accordance with 40 CFR 264.304 and 329 IAC 3.1-9-1, a Response Action Plan (RAP) to monitor, record, and respond to failures of the leachate collection and detection systems has been implemented. The RAP is presented in **Appendix D-3**. Figure F-3 is the weekly Leachate Detection System (LDS) Leachate Log form on which the leachate flows are recorded.

F-2b(7) Land Treatment Facility Inspection

Since the Permit pertaining to the Greenbelt II Landfill does not include a hazardous waste land treatment facility, Sections F-2b(7)(a) and (b) are not applicable.

F-2b(8) Miscellaneous Unit Inspections

No miscellaneous hazardous waste units are included in the Permit pertaining to the Greenbelt II Landfill. Therefore, this section is not applicable.

F-2b(9) Boilers and Industrial Furnaces (BIF) Inspections

Since the Permit pertaining to the Greenbelt II Landfill does not include hazardous waste treatment using boilers and industrial furnaces, Section F-2b(9) is not applicable.

F-2b(10) Containment Building Inspection

Since the Permit pertaining to the Greenbelt II Landfill does not include a hazardous waste containment building, Section F-2b(10) is not applicable.

F-3 Waiver of Documentation of Preparedness and Prevention Requirements

F-3a Equipment Requirements

F-3a(1) Internal Communications

The Greenbelt II Landfill is not manned full time; personnel are present during routine operations including ash unloading, sludge unloading, and solidification events. When on the landfill, personnel are required to have access to a two-way radio and/or a cellular telephone, which can be used to provide immediate emergency instruction to facility personnel.

F-3a(2) External Communications

The Midwest Plant telephone network, as well as the cellular telephones carried by personnel, have the capability to summon external emergency assistance from the local police department and/or fire department, or state or local emergency response teams as appropriate.

F-3a(3) Emergency Equipment

Emergency equipment including, at a minimum, portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment will be available within the permittee's emergency response vehicle, maintained at the permittee's nearby Gary Works Complex. This vehicle will be available to respond to emergencies associated with the Greenbelt II Landfill. The equipment contained within the emergency response vehicle is listed in the Contingency Plan, provided in Attachment G of the Permit.

F-3a(4) <u>Water for Fire Control</u>

Water for fire control at the Greenbelt II Landfill can be provided by either the permittee's fire truck or fire hydrants supplied by the permittee's fire control system. Fire hydrants are located in the vicinity of the Greenbelt II Landfill and are capable of providing flows of 1,600 gallons per minute.

F-3b Aisle Space Requirements

The roadway network in the Greenbelt II Landfill area provides adequate clearance for passage of emergency equipment and other vehicular traffic.

F-4 Preventive Procedures, Structures, and Equipment

F-4a Unloading Operations

F006 filter cake sludge is generated at the Chrome Treatment Plant filter press, and when disposed in the Greenbelt II Landfill, is loaded into an open-top, hydraulically–operated, dumping trailer through a hopper/chute assembly. The dump trailers transport the F006 sludge to the Greenbelt II Landfill over asphalt-paved roads as shown on the figure located in **Appendix E-5** of this Permit.

Unloading of the F006 sludge will occur within the limits of the Greenbelt II Landfill at the designated dump pad. The sludge transport vehicles access the dump pad area from the main plant roadway using temporary slag and/or gravel roads. Plan views and cross-sectional views of the access roads are shown on Sheets 4, 5, and 20 of the Permit for the Greenbelt II Landfill.

Typically the access roads are a maximum of 2.0 feet of coarse graded slag bearing on the hard, compacted, solidified sludge mixture.

It is possible that drag-out of waste may occur on transport vehicle tires. To minimize this, the landfill access roads and designated dump pad are periodically maintained through the addition of fresh slag and/or gravel. In addition, drivers of the waste hauling vehicles are instructed not to move forward until the trailer is completely lowered, and to avoid driving through the off-loaded wastes. Furthermore, visible waste present on the exterior of the transport vehicle, including the wheels will be removed after unloading.

F-4b Run-off

Runoff at the Greenbelt II Landfill is divided into contact and non-contact waters through the use of hydraulic barriers. The barriers (shown on Sheets 20 and 21 in the Permit) are constructed at the intercept line between active and inactive (i.e., capped) portions of the landfill. Non-contact waters are waters which have not come into contact with the solidified waste. These non-contact waters are directed into the perimeter collection pond. The non-contact perimeter collection pond for Greenbelt II is shown on Sheets 3 and 22 in the Permit. These ponds are constructed to safely retain the discharge from a 24-hour duration, 25-year frequency storm. Additional discussion on the pond size and construction is presented in Attachment D of the Permit, and calculations concerning the size of the ponds are presented in **Appendix D-14**.

Contact waters are those which fall directly on the active portions of the Greenbelt II Landfill. To collect these waters, the active portion of the landfill is sloped at a minimum of 1 percent to a common collection area. The water is then directed via gravity to the Greenbelt pumphouse and conveyed via pipeline to the Chrome Treatment Plant. The Greenbelt pumphouse and the collection/transport pipeline is a component of the facility's NPDES-permitted wastewater treatment system and thus are not subject to regulation under RCRA. Also, IDEM reviewed the pumphouse design and approved the construction permit in 1989. Therefore, construction details, operation, and maintenance of this system are not included in this Permit. The features associated with run-off control will be inspected in accordance with the procedures described above in Section F-2b.

F-4c Water Supplies

The permittee has addressed the potential for contamination of water supplies from its operations at the Greenbelt II Landfill as described below:

Runoff from the active areas of the Greenbelt II Landfill is directed to the facility's NPDESpermitted wastewater treatment system. Therefore, contamination of water supplies by contaminated runoff should not occur.

No free liquids are disposed in the Greenbelt II Landfill, therefore contamination of water supplies by migration of liquid wastes into the water supplies should not occur.

It is not expected that the wastes placed into the Greenbelt II Landfill would contaminate water supplies. Although the F006 filter cake already meets the LDR treatment standards before being deposited in the landfill, waste disposed in the Greenbelt II Landfill is solidified by mixing with fly ash and/or lime. This solidification process is considered a physical process which also increases the strength properties for compaction and stability. Therefore, this process is not a chemical (treatment) process. Laboratory analyses of the extract from the waste are included in Appendix C-1 of the Permit.

Permeability test results for the solidification were consistently in the 10⁻⁷ cm/sec range, which is similar to that of the low permeability soil layer of the cover. Therefore, infiltration of water into the waste in the active areas of the Greenbelt II Landfill would be approximately equivalent to the amount of infiltration into the closed portions of the Greenbelt II Landfill. Furthermore, the presence of unstabilized, unsolidified (i.e., higher permeability) wastes involved in pre-1988 disposal practices at the closed Greenbelt I Landfill are not known to have caused contamination of water supplies therefore, contamination from the low permeability wastes currently being placed in Greenbelt Landfill II is not expected to occur. Finally, analyses of leachate from both stabilized and unstabilized waste indicate a low potential for groundwater contamination.

F-4d Equipment and Power Failure

The Greenbelt pumphouse relies on power to operate. In the event of power failure, excess flow, or pump mechanical breakdown, an alarm is triggered that signals the 24-hour plant security station and treatment operators.

F-4e Personnel Protective Equipment

Personnel conducting work within the confines of the Greenbelt II Landfill are required to wear hard hats, steel toed boots, and safety glasses. Other than inspecting the trailer and tires before leaving the landfill, drivers of hauling vehicles are restricted from exiting the truck while on the landfill for unloading operations. No direct contact between personnel and in-place waste materials occurs, therefore, hazards associated with contact with the waste are mitigated.

F-4f Landfill Cover

The final cover (and interim cover, if present) will be regularly inspected during operation of the landfill on a semi-annual basis (see **Figure F-4**). Specific issues that may need to be addressed include:

- Erosion damage;
- Settlement, subsidence, and displacement; and
- Maintenance of a vegetative layer sufficient to control erosion.

F-5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste

Wastes managed within the Greenbelt II Landfill are discussed in detail in Attachment C of the permit. As discussed in Attachment C, these waste streams are neither reactive, ignitable, nor incompatible. Therefore, Sections F-5a through F-5o are not applicable to this Permit.

U.S. Steel – Midwest Plant Greenbelt II Landfill INR000109017 Attachment F – Figures

Attachment F – Procedures to Prevent Hazards FIGURES

FIGURE F-1				
GREENBELT II LANDFILL WEEKLY/AFTER STORMS INSPECTION				
INSPECTED BY: DATE/TIME:				
EVALUATE THE FOLLOWING AREAS:				
NON-CONTACT RUN-OFF SYSTEM	YES	NO		
1. IS WATER OR DEBRIS PRESENT IN RUN-OFF COLLECTION FLOW AREAS?				
2. ARE EROSION RIVULETS OR CRACKS PRESENT ON DIKE?				
3. ARE THERE ANY SLIDES/SLUMPS PRESENT ON DIKE SLOPES?				
COMMENTS ON NON-CONTACT RUN-OFF SYSTEM				
(Use this area to describe problems noted above, recommended solutions, actions to correct them, and dates of completion)				
CONTACT RUN-OFF SYSTEM	YES	NO		
4. IS WATER PONDED ON THE LANDFILL?				
5. BASED ON VISUAL OBSERVATIONS, IS SUMP PUMP SYSTEM OPERATING PROPERLY?				
COMMENTS ON CONTACT RUN-OFF SYSTEM (Use this area to describe problems noted above, recommended solutions, actions to correct them, and dates of o				
LANDFILL ACTIVE/OPERATING AREA	YES	NO		
6. IS THERE ANY EVIDENCE OF UNAUTHORIZED DEBRIS DISPOSED OF IN LANDFILL?				
7. IS THERE ANY NEED FOR ADDITIONAL SLAG ON LANDFILL ROADS OR DUMP PAD?				
COMMENTS ON LANDFILL ACTIVE/OPERATING AREA				
(Use this area to describe problems noted above, recommended solutions, actions to correct them, and dates of completion)				
VAULTS/MANHOLES	YES	NO		
8. ARE CLEAN-OUT RISERS BROKEN OR ARE CAPS MISSING?				
9. IS THERE ANY LEACHATE FLOW PRESENT?				
COMMENTS ON VAULTS/MANHOLES				
(Use this area to describe problems noted above, recommended solutions, actions to correct them, and dates of o	complet	ion)		

Figure F-2				
GREENBELT II LANDFILL F006 WASTE TRANSPORT INSPECTION				
(Inspection to be conducted only whe	en F006 waste is hauled to Greenbelt II Landi	fill)		
	DRIVER NAME:			
TRAILER NO.:	BADGE NO.:			
DATE:	TIME:			
EVALUATE T	HE FOLLOWING AREAS:			
PRE-TRIP INSPECTION (C	OR "AT DEWATERING")	YES	NO	
1. ARE SLUDGE CLUMPS VISIBLE ON THE BODY	Y OF THE TRUCK AND/OR TRAILER?			
2. IS SLUDGE VISIBLE ON THE TIRES AND/OR V	WHEEL-WELLS OF TRUCK AND/OR TRAILER			
3. IS SLUDGE VISIBLE ON THE UNDERSIDE OF	TRUCK AND/OR TRAILER?			
4. DOES THE TRAILER/TUB SHOW ANY SIGNS OF DETERIORATION? (IF "YES" CONTACT SUPERVISOR)				
5. IF A RENTAL TRAILER IS BEING USED, ARE T	HE SCREW DOWNS ON TAILGATE SECURE?			
HAULING INSPECTION (OR	"AT THE GREENBELT")	YES	NO	
6. IS THERE ANY SIGN OF SPILLAGE/STAINING PAD? (IF " YES " CONTACT SUPERVISOR OR ENVIRON				
	RAILER(TUB) CONDITION			
(Use this area to describe problems noted above, recor	nmended solutions, actions to correct them, and dates	of comple	etion)	

FIGURE F-3 LEAK DETECTION SYSTEM (LDS) LEACHATE LOG

VAULT 1 - ACRES IN USE FOR CELLS A & B: 9.1				
DATE	<u>VAULT 1</u> FLOW METER READING (GALLONS)	GALLONS PUMPED SINCE PREVIOUS READING	AVG DAILY FLOW RATE (GpAD)	**RESPONSE ACTION PLAN
	**Response Action Plan (RAP)	Continuous Operation Phase		
NLR	**Response Action Plan (RAP) (Normal Leakage Rate) = GpAD <25	See Table 1 in RAP		
ALR ((Watch Level) = GpAD >25, <182.2 Action Leakage Rate) = GpAD >182.2	See Table 2 in RAP See Table 3 in RAP		

VAULT 2 - ACRES IN USE FOR CELL C: 5.2

FIGURE F-3 LEAK DETECTION SYSTEM (LDS) LEACHATE LOG

DATE	VAULT 2 FLOW METER READING (GALLONS)	GALLONS PUMPED SINCE PREVIOUS READING	AVG DAILY FLOW RATE (GpAD)	**RESPONSE ACTION PLAN
	l			
	<u> </u>		<u> </u>	<u> </u>
	**Response Action Plan (RAP)	Continuous Operation Phase		
	(Normal Leakage Rate) = GpAD <25	See Table 1 in RAP See Table 2 in RAP		
ALR ((Watch Level) = GpAD >25, <182.2 Action Leakage Rate) = GpAD >182.2	See Table 2 in RAP		

YES

NO

FIGURE F-4 GREENBELT II LANDFILL SEMI-ANNUAL INSPECTION

INSPECTED BY:

DATE/TIME:

EVALUATE THE FOLLOWING AREAS: 1. IS THERE ANY EVIDENCE OF SIGNIFICANT DETERIORATION OR DAMAGE TO THE SECURITY FENCE (I.E. HOLES, GAPS, FALLEN POSTS)?

2. ARE THERE ANY BURROWS UNDER THE SECURITY FENCE THAT WOULD ALLOW ACCESS TO UNAUTHORIZED ENTITIES?

3. ARE ALL WARNING SIGNS PRESENT AND LEGIBLE FROM 25 FEET?

4. EMERGENCY EQUIPMENT PRESENT AND IN WORKING ORDER? (I.E. FIRE EXTINGUISHERS, FIRE CONTROL EQUIPMENT, SPILL CONTROL EQUIPMENT AND DECONTAMINATION EQUIPMENT)

5. ARE GATE LOCKS PRESENT AND FUNCTIONING PROPERLY?

6. FINAL COVER AND INTERIM COVER (IF APPLICABLE) ADEQUATE?

7. FINAL COVER AND INTERIM COVER (IF APPLICABLE) ADEQUATE?

8. LEACHATE FLOW METER FUNCTIONING?

COMMENTS

(Use this area to describe problems noted above, recommended solutions, actions to correct them, and dates of completion)

FIGURE F-5 GREENBELT II LANDFILL POST-CLOSURE INSPECTION			
INSPECTED BY: DATE/TIME:			
EVALUATE THE FOLLOWING AREAS:	_	_	
SECURITY FENCE	YES	NO	
 IS THERE EVIDENCE OF DETERIORATION OR DAMAGE TO THE SECURITY FENCE (I.E. HOLES, GAPS, FALLEN POSTS)? 			
2. ARE THERE BURROWS UNDER THE SECURITY FENCE THAT WOULD ALLOW ACCESS TO UNAUTHORIZED ENTITIES?			
3. ARE WARNING SIGNS PRESENT AND LEGIBLE FROM 25 FEET?			
4. ARE GATE LOCKS PRESENT AND FUNCTIONING PROPERLY?			
COMMENTS ON SECURITY FENCE			
Use this area to describe problems noted above, recommended solutions, actions to correct them, & dates of completion			
FINAL COVER/CAP	YES	NO	
5. ARE THERE AREAS OF MISSING/DYING VEGETATION THAT IMPACT COVER INTEGRITY?			
6. ARE THERE EROSION RIVULETS PRESENT IN COVER?			
7. IS THERE EVIDENCE OF SLUMPS, SLIDES, BULGING, SLOUGHING OR CRACKS PRESENT THAT IMPACT COVER INTEGRITY?			
8. IS THERE EVIDENCE OF DEEP-ROOTED PLANTS?			
9. IS THERE EVIDENCE OF BURROWING ANIMALS?			
10. ARE THERE AREAS OF WASHOUT AT THE BASE OF LANDFILL?			
COMMENTS ON FINAL COVER/CAP			
Use this area to describe problems noted above, recommended solutions, actions to correct them, & dates of completion			
BENCHMARKS	YES	NO	
11. ARE THE BENCHMARKS OBSCURED BY OVERGROWTH?			
12. ARE BENCHMARKS SHOWING SIGNS OF DETERIORATION?			
13. ARE BENCHMARKS MISSING?			
COMMENTS ON BENCHMARKS			
Use this area to describe problems noted above, recommended solutions, actions to correct them, & dates of	comple	tion	