



PUBLIC NOTICE

Date posted: 5/14/24

DEQ Requests Comments on Proposed Solid Waste Permit for Wasco County Landfill in The Dalles

HOW TO PROVIDE PUBLIC COMMENT

Facility name: Wasco County Landfill
Permit type: Municipal Solid Waste Landfill
Comments due by: June 14, 2024 at 5 p.m.

Submit written comments:

By mail: Solid Waste Permit Coordinator, Oregon DEQ,
400 E Scenic Drive, Suite 307 The Dalles, OR 97058
By email: ERPermit.Coordin@deq.oregon.gov

The Oregon Department of Environmental Quality invites the public to provide written comments on the proposed municipal solid waste landfill permit for Waste Connections' Wasco County Landfill at 2550 Steele Road, The Dalles, OR.

Summary

DEQ intends to issue a solid waste permit renewal for this facility. The permit would continue to authorize Waste Connections to accept and dispose of municipal solid waste at the Wasco County Landfill. All activities must be performed in conformance under the requirements, limitations and conditions in the permit. This proposed action is subject to public review and comment.

About the facility

The Wasco County Landfill is a municipal solid waste landfill owned and operated by Waste Connections, Inc. The landfill serves the residents, farms and businesses in Wasco County. The landfill is located on a 332-acre site.

All active and future landfill disposal cells are constructed with composite liners and blanket drainage layers to contain and collect any liquids within the landfill. Landfill gas from both closed and active landfill areas is collected through a network of horizontal and vertical gas collection pipes, and then combusted in a flare that is regulated by a DEQ Air Quality Permit.

Birds are managed by the landfill mainly with the use of a green laser and propane cannons. These methods are non-lethal and encourage the birds to move elsewhere. The Landfill contracts with Animal Plant Health Inspection Services for additional bird management.

Wasco County Landfill has approximately 30 years or more of useful life.

The Wasco County Planning Department signed a Land Use Compatibility Statements for Wasco County Landfill in December 2000. The document confirms the facility complies with local land use requirements and can continue operation in this area.

DEQ last issued the solid waste permit in December 2014. The facility also holds permits for air quality, a solid waste transfer station and an industrial stormwater permit.

Translation or other formats

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)
800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

The facility has complied with the municipal solid waste permit requirements under for the current permit term. The only issues DEQ noted were methane exceedances in the summer of 2021 at probe GP-4B and an exceedance of the leachate compliance level in Cell 1. Adjustments to the gas collection and control system eliminated the observed methane exceedance, and replacement of a failed pump brought the leachate level into compliance.

DEQ's Air Quality Program issued a Civil Penalty Assessment and Order for violation of the Plant Site Emission Limits, Greenhouse Gases and Volatile Organic Compounds of approximately \$95,000 on January 18, 2024. This penalty was related to alleged violations that occurred in 2021. This penalty has been appealed and the enforcement action is ongoing. In July 2022 Wasco County Landfill began operating the recently installed Gas Collection and Control System as required by the Air Quality Permit.

What types of waste does the permit regulate?

This permit sets conditions for how the facility manages disposal of solid wastes. The Wasco County Landfill primarily receives municipal solid waste and is authorized to accept agricultural, construction and demolition, industrial and other types of solid waste as listed under wastes authorized for receipt in the facility's solid waste permit. The Wasco County Landfill cannot accept any hazardous waste.

Various federal and state regulations apply to a disposal facility depending on the type of facility, the kind and amount of waste disposed and the location of the facility. All applicable regulations must be contained in the solid waste permit including the appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

How does DEQ determine permit requirements?

DEQ evaluates the potential waste accepted and the proposed management plans to determine permit requirements that meet federal and state regulations.

How does DEQ monitor compliance with the permit requirements?

DEQ ensures compliance with permit requirements through periodic report reviews and compliance inspections. The facility must follow all requirements of the solid waste permit to reduce potential risks to public health and the environment.

What happens next?

DEQ will consider and respond to all comments received and may modify the proposed permit based on comments received. DEQ can only modify the permit in accordance with rules and statutes under the authority of DEQ. Participation in the rulemaking or legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's permit.

DEQ will hold a public hearing to accept verbal comments if DEQ receives written requests for a hearing within 14 days of issuing this notice from at least 10 people or from an organization representing at least 10 people. DEQ gives equal weight to written and verbal comments.

For more information

Find more information by reviewing draft permit documents attached to this notice or contact Sharon Stephens at 541-298-7257 or ERPermit.Coordin@deq.oregon.gov to arrange viewing documents in person at a DEQ office.

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit DEQ's [Civil Rights and Environmental Justice page](#).



SOLID WASTE DISPOSAL SITE PERMIT: Municipal Solid Waste Landfill

Oregon Department of Environmental Quality
400 E. Scenic Drive, Suite 307
The Dalles, OR 97058-3434
541-298-7255

Issued in accordance with the provisions of Oregon Revised Statute Chapter 459; Oregon Administrative Rules 340, Divisions 90, 93, 95, 96 and 97; and subject to the Land Use Compatibility Statement referenced below.

Issued to:

Wasco County Landfill, Inc.
2550 Steele Road
The Dalles, OR 97058
Telephone: (541) 296-4082
Fax: (541) 296-6449
Email: wasco@skyride.net

Facility name and location:

Wasco County Landfill
2550 Steele Road
The Dalles, OR 97058

Section 13, T1N, R13E, W.M.
Wasco County Tax Lot Nos. 200, 2501, 2502, and
2600

Latitude: 45° 33' 36.78"
Longitude: 121° 8' 19.79"&

Owner:

Wasco County Landfill, Inc.
(a wholly owned subsidiary of Waste Connections,
Inc.)

Operator:

Wasco County Landfill, Inc.
2550 Steele Road
The Dalles, OR 97058

ISSUED IN RESPONSE TO:

- A solid waste permit renewal application received September 21, 2023.
- Land Use Compatibility Statements from Wasco County dated March 19, 1997, and December 1, 2000.

The determination to issue this permit is based on findings and technical information included in the permit record.

ISSUED BY THE OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Ron Doughten
Solid Waste Manager
Eastern Region

Date

Permitted Activities

Until this permit expires or is modified or revoked, the permittee is authorized establish, operate and maintain a solid waste land disposal site in conformance with the requirements, limitations, and conditions set forth in this document, including all attachments.

TABLE OF CONTENTS

Introduction

This document is a solid waste permit issued by the Oregon Department of Environmental Quality in accordance with Oregon Revised Statutes (ORS) 459 and Oregon Administrative Rules (OAR), Chapter 340.

| Section | Topic | Page |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------|-----------|
| PERMIT ADMINISTRATION | | 3 |
| 1 | Administration | 3 |
| 2 | Permit Modification | 4 |
| ALLOWABLE ACTIVITIES | | 5 |
| 3 | Authorizations | 5 |
| 4 | Prohibitions | 7 |
| OPERATIONS AND DESIGN | | 8 |
| 5 | Operations Plan | 8 |
| 6 | Recordkeeping and Reporting | 10 |
| 7 | Site Operations | 11 |
| 8 | Site Development and Design | 16 |
| 9 | Recycling Requirements | 18 |
| SITE CLOSURE | | 19 |
| 10 | Closure Construction and Maintenance | 19 |
| 11 | Financial Assurance | 20 |
| ENVIRONMENTAL MONITORING | | 21 |
| 12 | Environmental Monitoring Plan | 21 |
| 13 | Environmental Sampling Requirements | 21 |
| 14 | Establishing Permit-Specific Concentration Limits, Action Limits, Concentration Limit Variances and Site-Specific Limits | 22 |
| 15 | Environmental Monitoring Standards | 23 |
| 16 | Recordkeeping and Reporting – Environmental Monitoring | 25 |
| 17 | Environmental Monitoring Network | 26 |
| COMPLIANCE SCHEDULE | | 27 |
| 18 | Summary of Due Dates | 27 |
| ATTACHMENTS | | 30 |
| 19 | Attachment 1: Parameter groups | 30 |
| 20 | Attachment 2: Permit-Specific Concentration Limits, Action Limits, and Site-Specific Limits | 32 |

PERMIT ADMINISTRATION

1 Administration

1.1 Definitions

Unless otherwise specified, all terms are as defined in [OAR 340-093-0030](#).

1.2 Legal control of property

The permittee must at all times maintain legal control of the disposal site property; including maintaining a current permit, contract or agreement that allows the operation of the facility if the site is not owned by the permittee.

1.3 Submittals

All submittals required under this permit must be submitted as directed by DEQ.

Unless otherwise specified, all submittals and notifications to DEQ under this permit must be sent to:

Oregon Department of Environmental Quality
Manager, Solid Waste Program
400 E. Scenic Dr., Ste. 307
The Dalles, OR 97058
Telephone: (541) 298-7257

All submittals must include, at a minimum, one (1) paper copy and one (1) electronic copy in a format that is approved by the DEQ project manager. Note that some submittals may require more paper copies. Therefore, the permittee must confirm with the permit manager how many copies are necessary prior to submittal of a document.

1.4 Property rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights.

1.5 DEQ liability

DEQ, its officers, agents, or employees do not sustain any liability on account of the issuance of this permit or on account of the construction, maintenance, or operation of facilities pursuant to this permit.

1.6 Permit term

The effective date of this permit is the date this document is signed by DEQ. The expiration date of the permit is indicated at the top right of this document. The authorization to accept solid waste at the facility will end when this permit expires, is terminated, or revoked. After that time, the permittee cannot accept solid waste at the facility. If a complete application for permit renewal is filed with DEQ in a timely manner, the permit does not expire until DEQ takes final action on the renewal application.

Reference: [OAR 340-093-0070](#) and [OAR 340-093-0115](#)

1.7 Permit renewal

The permittee must submit an application for permit renewal if the permittee intends to continue operation beyond the expiration date of this permit. A complete solid waste disposal site permit renewal application must be submitted to DEQ **at least 180 days** before the existing permit expires.

Reference: [OAR 340-093-0070](#) and [OAR 340-093-0115](#)

1.8 Permittee initiated termination of permit

After facility closure, the permittee must request, in writing, to DEQ that the permit be terminated. Permittee must demonstrate to DEQ that the facility no longer requires a permit under [OAR 340-093-0050](#) before DEQ will terminate the permit.

Reference: [OAR 340-093-0050](#) and [OAR 340-093-0115](#)

1.9 Documents superseded

This document is the primary solid waste permit for the facility, superseding all other solid waste permits issued for the Wasco County Landfill by DEQ.

1.10 Binding nature

Conditions of this permit are binding upon the permittee. The permittee is liable for all acts and omissions of the permittee's contractors.

1.11 Other compliance

This permit's issuance does not relieve the permittee from the responsibility to comply with all other applicable federal, state, or local laws or regulations.

1.12 Access to facility

The permittee must allow representatives of DEQ access to the disposal facility at all reasonable times for the purpose of:

- Performing inspections
- Surveys
- Collecting samples
- Obtaining data
- Reviewing records
- Carrying out other necessary functions related to this permit

Reference: [OAR 340-093-0050](#)

1.13 Penalties

Violation of any condition of this permit or any incorporated plan may subject the permittee to civil penalties for each day of each violation.

Reference: [OAR 340-093-0050](#), [OAR 340-012-0160](#) and [ORS 459.995](#)

2 Permit Modification

2.1 Modification

At any time during the life of the permit, DEQ or the permittee may propose changes to the permit.

Reference: [OAR 340-093-0070](#) and [OAR 340-093-0113](#)

2.2 Modification and revocation by DEQ

DEQ may, at any time before the expiration date, modify, suspend or revoke this permit in whole or in part in accordance with [ORS 459.255](#) for reasons including, but not limited to the following:

- Violation of any terms or conditions of this permit or any applicable statute, rule, standard or order of the Environmental Quality Commission.
- Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts.
- A significant change in the quantity or character of solid waste received or in the operation of the facility.

Reference: [OAR 340-093-0113](#) and [OAR 340-093-0115](#)

2.3 Modification by permittee

The permittee must apply for a modification to this permit if a significant change in facility operations is planned, there is a deviation from activities described in this permit, or there is a sale or exchange of the facility. The permittee cannot implement any change in operations that requires a permit modification prior to receiving approval from DEQ.

Reference: [OAR 340-093-0070](#)

2.4 Change in name or address

The permittee must report to DEQ in writing any name or address change of the owner or operator of the facility or property **within 10 days** of the change.

Reference: [OAR 340-095-0020](#)

2.5 Transfer, sale or exchange of permit or facility

The property owner or person in control of the premises must submit a permit modification application to DEQ if a transfer, sale, or exchange of the activity or facility occurs.

Reference: [OAR 340-093-0070](#)

2.6 Public participation

Significant changes in the permit may be subject to the issuance of a public notice as set forth in DEQ rules for public notification.

Reference: [OAR 340-093-0100](#)

ALLOWABLE ACTIVITIES

3 Authorizations

3.1 Authorization of activities

The permittee must conduct all facility activities in accordance with the provisions of this permit. All plans required by this permit become part of the permit by reference once approved by DEQ. Any conditions of the approval are also incorporated into this permit unless contested by the permittee within 30 days of the receipt of a conditional approval.

3.2 Authorized landfill area

This permit authorizes 213.19 acres to be developed for landfill disposal in compliance with the conditions of this permit. The limits of waste disposal on the site property are defined by the Conditional Use Permits issued by Wasco County, and the DEQ approved Site Development Plan and approved amendments to that plan as referenced in Section 8.1 of this permit.

3.3 Waste authorized for receipt

This permit authorizes the facility to accept solid wastes as defined in ORS 459.005, subject to their management and disposal in accordance with the DEQ-approved Facility Operations Plan, and applicable conditions of this permit.

The following specific solid wastes are included in this authorization:

- **Domestic solid waste** as defined in [OAR 340-093-0030](#)
- **Construction and demolition waste** as defined in [OAR 340-093-0030](#)
- **Agricultural waste** as defined in [OAR 340-093-0030](#)
- **Industrial solid waste** as defined in [OAR 340-093-0030](#)
- **Asbestos-containing solid waste** if managed and disposed in accordance with Subsection 7.9 of this permit;
- **Waste tires** for storage/removal, and disposal in accordance with Subsection 7.10 of this permit;
- **Cleanup materials contaminated by hazardous substances** as defined in [OAR 340-093-0030](#), and if managed and disposed as specified in a DEQ-approved special waste management plan and in compliance with OAR [340-093-0170](#)
- **Sewage sludge and septage** if managed and disposed as specified in a DEQ-approved SWMP;
- **Polychlorinated biphenyls (PCB) containing solid waste** that is exempt from regulation under the Toxic Substances Control Act (TSCA); contains PCBs in concentrations

statistically less than 50 parts per million (ppm); and is managed and disposed as specified in a DEQ-approved SWMP. Otherwise PCB wastes are prohibited as described in Subsection 4.1.

- **Bovine spongiform encephalopathy (BSE) waste** if managed and disposed as specified in a DEQ-approved SWMP;
- **Empty, rigid pesticide containers** that have been decontaminated, verified, and altered as required by [OAR 340-109-0020](#); and
- **Free liquid containing solid waste** if managed and solidified prior to disposal, as specified in a DEQ-approved SWMP.

A DEQ-approved special waste management plan is required for acceptance of certain waste that requires special management due to the threat posed to human health or the environment. The following special wastes have received approval from DEQ:

- Oil Waste
- Infectious Waste
- Abrasive Blast Media Containing Pesticides
- Pesticide Treated Wood
- Ash
- Cleanup Materials Contaminated with Hazardous Substances
- Auto Shredder Residue
- Large Dead Animals
- Off-Specification Biosolids
- Liquid Waste for Solidification
- Paper Mill Waste
- Exempt Radioactive Materials
- Shredded Tires
- Sulfur Waste
- Wildfire Ash and Debris
- Pesticide Containing Waste

Note: Only exempt radioactive materials as defined in [OAR 345-050](#) area approved for disposal, all other radioactive materials are prohibited for disposal. Cleanup materials contaminated by hazardous substances as defined by [OAR 340-093-0030](#), which means “contaminated materials from the cleanup of releases of hazardous substances into the environment, and which are not hazardous wastes as defined by [ORS 466.005](#).”

3.4 Authorization to receive other waste

The permittee must not accept any waste excluded from the above authorization at the facility without first submitting the necessary information to DEQ for review and obtaining DEQ approval in writing.

DEQ may authorize the permittee to accept other waste if:

- The permittee updates the special waste management plan and submits it to DEQ for review and approval.
- DEQ approves the special waste management plan.
- The permittee can demonstrate that the materials are not hazardous waste, as defined by state and federal regulations, or otherwise a threat to human health or waters of the state.

3.5 Recirculation of leachate and condensate

Landfill leachate and gas condensate removed from the on-site landfill disposal units may be recirculated into lined portions of the landfill as specified in the DEQ-approved Operations Plan, provided that the leachate/condensate recirculation design and operation will:

- Enhance leachate evaporation and absorption into the waste mass.
- Not return appreciable amounts of recirculated leachate back to the leachate collection system.

- Monitor the leachate and gas condensate for hazardous waste.

3.6 Salvaging of materials

This permit authorizes the permittee to conduct salvaging or resource recovery of materials in a controlled and orderly manner.

Any salvaging of materials must be conducted in a controlled and orderly manner as described in the permittee's DEQ-approved operations plan. The permittee must notify DEQ prior to changing salvaging and recycling operations.

Reference: [OAR 340-094-0040\(11\)\(b\)\(F\)](#)

4 Prohibitions

4.1 Prohibited waste

The waste listed in this section is prohibited from being disposed with municipal solid waste or transferred to a landfill or other disposal sites for disposal, and the permittee cannot accept this waste unless otherwise approved in writing by DEQ:

- Hazardous waste – Reference: [40 CFR 258.20\(b\)](#), [OAR 340-101](#) and [OAR 340-093-0040](#)
- Liquid waste – Reference: [40 CFR 258.28](#)
- Radioactive waste – The disposal of any materials that meet the definition of radioactive waste established in Oregon Administrative Rule [345 Division 50](#), enforced by the Oregon Department of Energy is prohibited except as provided for at [ORS 469.525](#). Other legal prohibitions may apply.
- PCB or PCB Items regulated for disposal under [40 CFR 761.60\(a\)](#) through (c), [40 CFR 761.61](#), [40 CFR 761.63](#), [40 CFR 761.64](#), or [OAR 340-110-0060](#).

4.2 Waste banned from disposal

The permittee may collect the following waste for storage, management, and recycling only; the permittee must not knowingly accept or mix this waste with solid waste or transfer it to a landfill for disposal:

- Discarded or abandoned vehicles
- Large home or industrial appliances
- Used oil
- Whole Tires
- Lead-acid batteries
- Computer monitors having a viewable area greater than four inches diagonally
- Televisions having a viewable area greater than four inches diagonally
- Desktop computers
- Portable computers
- Source separated recyclable material as defined in [OAR 340-090-0010](#)

Reference: [ORS 459.247](#), [OAR 340-093-0040](#), [ORS 459A.080](#), and [OAR 340-090-0090](#)

4.3 Open burning

The permittee must not conduct any open burning at the site.

Reference: [OAR 340-264-0030](#)

OPERATIONS AND DESIGN

5 Operations Plan

5.1 Operations plan

Operations shall be guided by the September 2021 Operations Plan for Wasco County Landfill until an updated Operations Plan is approved and any subsequent and future DEQ-approved changes or amendments to the most recent approved Operations Plan. The updated plan must be consistent with the conditions of this permit. The DEQ-approved plan becomes an integral part of the permit.

5.2 Plan compliance

The permittee must conduct all operations at the facility in accordance with the approved Operations Plan, including any DEQ-approved amendments. The DEQ-approved Operations Plan is incorporated into the permit by reference.

Reference: [ORS 459.205\(1\)](#), [ORS 459.235\(1\)](#), [OAR 340-093-0140](#), [OAR 340-094-0040](#)

5.3 Plan content

The operations plan must describe facility operations, including the elements listed below, and demonstrate how the facility will comply with all regulatory and permit requirements:

| General Topics | Describe plans or procedures for: |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General operations | <ul style="list-style-type: none"> • Screening incoming waste to detect unauthorized or prohibited waste as required by 40 CFR 258.20(a) • Handling and removing unauthorized waste inadvertently discovered at the facility • Managing landfill gas • Managing landfill leachate in compliance with all permit conditions • Recirculating landfill leachate & gas condensate in compliance with Subsections 3.5 and 7.19 • Designing surface water and erosion control structures in compliance with all permit conditions • Responding to non-compliance events or situations |
| Disposal operations | <ul style="list-style-type: none"> • Placing daily and interim cover • Detecting and preventing the receipt and disposal of regulated hazardous waste and any other DEQ-prohibited waste • Disposing of putrescible waste • Disposing of cleanup materials contaminated with hazardous substances • Waste unloading and handling • Managing and disposing of special waste • Using, stockpiling, and tracking the receipt and use of waste approved for use as alternative daily cover • Reducing and controlling the risk of a landfill fire • Fill progression and phasing that is consistent with landslide stability recommendations, and takes into account other operational considerations such as leachate recirculation, etc. |
| Special waste management plan | <ul style="list-style-type: none"> • Identifying and characterizing special waste (for example: wastes which require special management or waste streams not otherwise authorized by this permit that are inadvertently received) • Identifying the source of all special waste • Waste screening procedures to prevent unauthorized receipt of asbestos waste materials and procedures to isolate, wet, analyze, and |

| General Topics | Describe plans or procedures for: |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | properly dispose of suspected asbestos containing waste materials or known asbestos containing waste materials inadvertently received <ul style="list-style-type: none"> • Determining appropriate handling and disposal procedures • Documenting special waste management plan implementation, including waste characterization and location of waste disposition Reference: OAR 340-093-0190 , OAR 340-094-0040(11)(b)(J) |
| Ancillary operations | <ul style="list-style-type: none"> • Placing and maintaining interim cover over inactive landfill areas • Management of waste tires • Managing transfer containers • Solidifying liquid waste prior to disposal |
| Inspection and maintenance | <ul style="list-style-type: none"> • Washing equipment • Maintaining leachate and gas collection systems • Maintaining monitoring stations and devices • Periodically inspecting the continuity and integrity of primary leachate collection pipes • Maintaining surface water control structures |
| Operating record | <ul style="list-style-type: none"> • Establishing and maintaining the operating record • Establishing and maintaining a complaint log and complaint response procedure |
| Contingency | <ul style="list-style-type: none"> • Backup methods for storing and/or disposing of leachate • Providing fire protection equipment, and arrangements made with local fire control agency and • Notifying DEQ about emergencies and fires |

Reference: [OAR 340-094-0040](#) describes requirements for preparing an operations plan.

5.4 Operations and maintenance manual

Within 120 days of the Operations Plan's approval, the permittee must prepare an updated Operations and Maintenance Manual that includes detailed inspection and maintenance procedures and an associated schedule for all facility components that require periodic inspection.

The Operations and Maintenance Manual must include specific procedures for routine preventative maintenance and repairs and for response to emergencies. The preventative inspection and maintenance program should address the following equipment and facilities: personnel safety equipment, operating equipment, support facilities, environmental control systems, environmental monitoring systems, and the transportation system.

The permittee must keep a copy of the Operations and Maintenance Manual with the Operating Record, readily available for DEQ inspection and review.

5.5 Plan and manual maintenance

The permittee must update and revise both the Operations Plan and the Operations and Maintenance Manual as necessary to reflect current and future facility conditions and procedures.

The permittee must submit any associated revisions or updates of the Operations Plan to DEQ for review and approval.

5.6 Plan and manual compliance

The permittee must operate the facility in accordance with the approved Operations Plan, the Operations and Maintenance Manual, and any amendments to these documents.

6 Recordkeeping and Reporting

6.1 Records

The permittee must keep copies of all records and reports for a minimum of five years from date initially placed in the facility operating record.

Reference: OAR 340-094-0040

6.2 Non-compliance reporting

The permittee must take immediate corrective action for any violations of permit conditions or DEQ rules and notify DEQ by sending an email to ERPermit.Coordin@deq.oregon.gov. Additional notification may be made by telephone: 541-298-7255.

6.3 Permit display

The permittee must keep a copy of the permit where operating personnel can easily refer to it.

6.4 Access to records

Upon request, the permittee must make all records and reports related to the permitted facility available to DEQ.

6.5 Procedures

The permittee's record-keeping and reporting procedures are as follows:

Table with 2 columns: Step, Action. Contains 7 rows detailing recordkeeping and reporting procedures, including waste type identification and reporting requirements.

| Step | Action |
|------|-------------------------------------------------------------------|
| 8 | Update all records to reflect current conditions at the facility. |

7 Site Operations

7.1 General site operations

The permittee must at all times maintain and properly operate all waste collection and disposal facilities to prevent discharges, health hazards, and nuisance conditions and in accordance with the provisions of this permit.

7.2 Access control

The permittee must control public access to the landfill as necessary to prevent unauthorized entry and dumping.

7.3 Signs

Signs which clearly indicate the disposal area rules must be posted to provide information critical to the safe and efficient operation of the facility, and to facilitate compliance with the approved site Operations Plan. A prominently displayed sign, located at the landfill entrance, or other suitable location(s) approved by DEQ, must include the following information:

- The name of facility
- The emergency telephone number
- The days and hours of operation
- The authorized and prohibited wastes
- The Solid Waste Permit number
- The operator's address

7.4 Access roads

The permittee must provide all-weather access roads from the landfill property line to the active operational area and the environmental monitoring stations and maintain them in a manner that prevents traffic hazards, dust, and mud.

The permittee must use appropriate means, including truck washing, as needed to prevent haul trucks from tracking mud on external roadways outside the landfill boundaries or offsite. Any truck washing activities must be conducted on a hard surface and any disposal of wastewater must be accomplished in a manner approved by DEQ.

7.5 Discovery of prohibited waste

If the permittee discovers prohibited wastes, the permittee must notify DEQ within 24 hours and begin to isolate or remove the waste. In addition, the permittee must take digital photos of the prohibited waste to document its quantity, nature, identity, and source.

For prohibited waste that is hazardous, suspected to be hazardous waste, explosive, radioactive or infectious, the permittee must, within 90 days following discovery, transport the waste to a disposal or recycling facility authorized to accept such waste, unless DEQ approves otherwise. The permittee's temporary storage and transportation practices for this type of waste must comply with DEQ rules.

For non-putrescible or non-hazardous prohibited waste, the permittee must, within 60 days following discovery, transport the waste to a disposal or recycling facility authorized to accept such waste, unless otherwise approved or restricted by DEQ. The permittee must obtain DEQ's written approval to store putrescible, non-hazardous prohibited waste if such waste is not promptly removed from the landfill site.

7.6 Agricultural waste from agricultural quarantine area

To ensure that the health of the neighboring agricultural community is not compromised by waste accepted at the site, the permittee must notify the Wasco County Fruit and Produce League either:

- In advance of bidding on any contract to accept waste from an agricultural quarantine area that could be incompatible with local agricultural production; or
- Whenever an agricultural quarantine is designated for an area from which agricultural waste is being accepted at the site through an existing contract.

The required notification must describe how acceptance and management of such waste will be protective of the local agricultural community.

7.7 Oil and hazardous material spill response and reporting

The permittee must immediately clean up any spill of oil or hazardous material as required by [OAR 340-142-0060](#). If the spill is of a reportable quantity the permittee must immediately report the spill to the Oregon Emergency Response System at 1-800-452-0311 and DEQ The Dalles office at (541) 298-7255.

Reportable quantities include:

- Any amount of oil spilled to waters of the state
- Oil spills on land in excess of 42 gallons
- 200 pounds, 25 gallons or more of spilled pesticide residue
- Spills of hazardous materials that are equal to, or greater than, the quantity listed in the Code of Federal Regulations, [40 CFR Part 302](#) (List of Hazardous Substances and Reportable Quantities) and amendments adopted before July 1, 2002

For a complete list of hazardous materials required to be reported, please refer to [OAR 340-142-0050](#).

7.8 Unloading area

The area(s) for unloading incoming waste must be clearly defined by signs, fences, barriers or other devices. The size of the working face must be minimized as described in the DEQ-approved Operations Plan.

7.9 Asbestos waste management

The permittee must screen in-coming wastes to prevent inadvertent receipt of asbestos wastes or acceptance of asbestos waste outside of the asbestos waste area. The permittee must off load and dispose of asbestos-containing waste as specified in a DEQ-approved special waste management plan within the Operations Plan, the Operations & Maintenance Manual, and according to [OAR 340-248](#). If prohibited, the permittee must follow DEQ-approved asbestos waste screening procedures and procedures for inadvertent receipt of asbestos waste materials.

7.10 Waste tire management

The facility may accept up to one hundred (100) whole tires for storage and removal, and up to two thousand (2,000) whole tires for storage and removal if the permittee maintains a continuous contract with a waste tire carrier to remove the tires from the site and stores the tires as required by [OAR 340-096-0230](#).

Tires may be disposed in the landfill as specified in a DEQ-approved Special Waste Management Plan, and only if the tires are:

- Chipped in accordance with standards established under [OAR 340-093-0190\(4\)](#); or
- From vehicles not normally used on highways and the tires have been determined to be exempt from OAR 340-064-0052(1) banning whole tire disposal.

7.11 Infectious waste sharps

The permittee may receive "Sharps" for disposal if they have been treated by placement in a leak-proof, rigid, puncture-resistant, container that is taped closed or tightly lidded to prevent loss of the contents. The permittee may dispose of sharps only in a segregated, dedicated, clearly marked and documented location in accordance with the approved Operations Plan.

7.12 Containers

The permittee must clean all containers on-site, as needed, to maintain a sanitary operating environment and to prevent malodors, unsightliness, and attraction of vectors.

Reference: [OAR 340-093-0210](#) and [OAR 340-096-0040](#)

7.13 Equipment

The permittee must have readily available equipment of adequate size and design to properly operate the facility at all times and maintain compliance with all permit conditions.

7.14 Vehicles and truck covers

All vehicles and equipment operated by the permittee and using public roads, must be constructed, maintained and operated so as to prevent leaking, shifting or spilling of loads while in transit. The permittee must notify all incoming waste haulers that trucks containing loads must be covered or suitably cross-tied to prevent any load loss during shipment.

Reference: [OAR 340-093-0220](#)

7.15 Litter control

The permittee must at all times minimize windblown litter and collect it quickly and effectively to prevent scattering, nuisance conditions and unsightliness.

7.16 Vector control

The permittee must minimize vectors in the active disposal area, including insects, rodents, birds, or other animals.

7.17 Daily cover

At the end of each working day, the permittee must cover all solid wastes which are not approved for alternative daily cover (ADC) use with at least a six-inch-thick layer of compacted soil or with a DEQ-approved ADC.

7.18 Alternative Daily Cover

The permittee must measure and document alternative daily cover (ADC) usage in accordance with the DEQ-approved Operations Plan. The permittee must not claim ADC usage of the greater of 10% of "Total Tons Received in Reporting Period," or 15% of "Counting Waste" (i.e., residential and commercial domestic solid waste, and construction and demolition waste) on the Solid Waste Disposal Report/Fee Calculation form without first obtaining written DEQ approval. To obtain DEQ approval, the permittee must submit a detailed justification and methodology report of the facility ADC usage including typical daily disposal cell construction dimensions, cover procedures, operational procedures for measuring and documenting daily ADC usage and conversion factors with supporting documentation.

Once DEQ has approved the justification and methodology report above, the permittee must include detailed documentation of ADC usage, including measurements and calculations with each Solid Waste Disposal Report/Fee Calculation form whenever ADC usage claims exceed the 10% or 15% limit described above.

7.19 Leachate management systems

The permittee must operate the disposal site in a manner that deters leachate production to the maximum extent practicable, and construct, operate and maintain in good functional condition all DEQ-approved leachate containment, collection, detection, removal, storage, and treatment systems. The permittee must monitor landfill leachate collection sump levels continuously and remove leachate as needed to minimize fluid build-up on the bottom liner and prevent the hydraulic head (fluid depth) from exceeding one foot on the primary liner outside of the sump areas.

The permittee must incorporate into the site Operations Plan, an updated version of the draft October 2012 Leachate Management Plan, as approved by DEQ letter dated December 6, 2012, and any subsequent modification approved/required by DEQ. Unless otherwise approved by DEQ, the "pump-on" and "pump-off" liquid depths for each sump are as established by a July 2, 2013 Sump Capacity Evaluation Report approved by DEQ letter dated August 14, 2013.

Leachate sump pumps must be located at the accessible low point within each leachate collection and removal system (LCRS) and secondary leachate collection system (SCS) sump. DEQ shall review and

approve the sump pump location within each sump, and the respective "pump-on" and "pump-off" liquid depth settings for each sump as described in the facility's Operations Plan.

The compliance elevation for maximum allowable leachate depth within a LCRS or SCS sump shall be 12 inches above the "pump-on" setting when the respective pump is located at the accessible low point within the sump (e.g., the Phase IV Cell 1 LCRS riser has a low point 255.2 ft. from the end of the riser, and the Phase IV Cell 3A LCRS riser has a low point 286.1 ft. from the end of the riser). If the liquid depth within a LCRS or SCS sump exceeds 12 inches above the "pump-on" setting elevation, then the permittee must immediately report such an exceedance to DEQ.

7.20 Interim cover

As specified in DEQ-approved designs and operations plans, the permittee must place and maintain interim cover over fill areas that will not receive additional waste for an extended period of time (for example: greater than 120 days) and actively revegetate, in a DEQ-approved manner, any interim cover that will remain exposed for more than two years.

7.21 Drainage

The permittee shall manage stormwater on-site by directing stormwater and surface water runoff to the constructed stormwater storage/evaporation ponds consistent with the Stormwater Pollution Control Plan required by the 1200-Z NPDES General Industrial Stormwater Permit issued by DEQ.

The permittee must maintain all stormwater drainage structures in a serviceable condition and free of obstructions and debris at all times.

The permittee must report to DEQ within 24 hours any significant malfunctions or damage and complete repairs within 60 days of discovery of the problem.

7.22 Air emissions

The permittee must control air emissions, including dust, malodors, or air toxics, from disposal, construction, operation and all other activities at the disposal site in compliance with the facility's Oregon Title V Operating Permit No. 33-0007-TV-01, including applicable visible emissions and nuisance requirements of [OAR 340-208](#).

7.23 Landfill gas management

The permittee must control and manage landfill gas (LFG) in compliance with the requirements of 40 CFR [Part 51](#), [Part 52](#), and [Part 60](#), [OAR 340-094-0060\(4\)](#), the facility's Oregon Title V Operating Permit No. 33-0007-TV-01, and this permit.

The permittee must operate and maintain the landfill gas control and monitoring systems in good functional working order as required to prevent explosion concerns, environmental concerns, nuisance odors, unauthorized air emissions, and LFG migration (see methane compliance limits in Subsection 15.6).

If critical LFG control or monitoring equipment is significantly damaged or compromised, the permittee must replace or repair that equipment, within 60 days of discovering the problem and submit a written inspection report to DEQ.

7.24 Fire protection and reporting

The permittee must provide complete and sufficient protection equipment and facilities in accordance with the DEQ-approved Operations Plan.

The permittee must make arrangements with the local fire control agency to immediately acquire its services when needed. The permittee must implement preventative measures to ensure adequate on-site fire control, as determined by the local fire control agency. Fires must be immediately and thoroughly extinguished.

The permittee must report fires to DEQ within 24 hours of discovery by sending an email to ERPermit.Coordin@deq.oregon.gov and calling by phone: 541-298-7255.

7.25 Stability Monitoring

The permittee must maintain, and include in the site Operations Plan, a DEQ-approved program for monitoring landslide movement at the site during the entire permitted life of the facility. Stability monitoring of the Phase IV subgrade slopes, prior to liner placement, must conform to criteria established in DEQ's September 29, 2008, conditional approval letter, and any subsequent DEQ-approved modification of those criteria.

The stability monitoring program must be modified and updated, as necessary, to continually remain effective at detecting on-site landslide movement, and to document the stability of each newly constructed landfill disposal unit prior to disposing of waste into the new unit.

7.26 Water supply

The permittee must provide water in sufficient quantities for fire protection, dust suppression, establishment of vegetation, and other site operations requiring water.

7.27 Cover system

The permittee must monitor and maintain the cover system, including cover thickness. The permittee must repair the cover with approved soil in all areas damaged by erosion, settlement, or cracking; and fertilize, re-seed and maintain sparsely vegetated areas. Any construction or re-development proposals involving the landfill must include an evaluation of potential impacts to the cover system and a plan to restore the cover in the event that construction activities disturb the cover that DEQ approves.

7.28 Vegetation

The permittee must establish and maintain a dense, healthy growth of vegetation on the landfill cover except for areas occupied by structures or pavement associated with the site.

7.29 Surface contour maintenance

The permittee must maintain the final surface contours of the landfill cover in accordance with the following criteria:

- Erosion and ponding of water is prevented to the maximum extent practicable.
- Erosion damage (cuts) must be repaired and seeded so that all waste remains covered.
- The permittee must refill with soil, re-grade, and seed all areas that have settled or where water ponds, and all areas where the cover soil has been damaged by cracking or erosion.
- Areas where vegetation has not been fully established must be improved so that vegetation is established and maintained in a healthy condition to protect the cover and minimize runoff or leachate creation.

7.30 Future use

Any future use, activity, or construction of buildings, structures, or utilities on or within 200 feet of the waste footprint of this disposal site must have DEQ's prior written approval and must be done in a manner that protects the integrity of the final cover system, landfill stability, gas monitoring devices, and surface water control systems.

7.31 Complaint log

The permittee must investigate and attempt to resolve all complaints it receives regarding facility operations by doing the following:

- Contact the complainant within 24 hours to discuss the problem.
- Keep a record of the complaint, name, and contact information (when possible), date complaint was received, date of facility response, description of facility response.
- Immediately initiate procedures at the facility, when possible, to resolve the problem identified by the complainant.
- For odor, litter or dust complaints, the permittee must report to DEQ as soon as complaints are received from five different businesses and/or individuals within one week, or if an odor event lasts longer than 24 hours without resolution or mitigation.

8 Site Development and Design

8.1 Site development plan

Landfill disposal unit (cell) development and closure shall be guided by the April 2019 Site Development Plan for Wasco County Landfill until an updated Site Development Plan is approved and any subsequent and future DEQ-approved changes or amendments to the most recent approved Site Development Plan.

Reference: DEQ's *Solid Waste Landfill Guidance*, describes the basic elements of a site development plan. Organizing the plan in accordance with the Guidance will expedite DEQ's review.

8.2 Baseline design criteria

New MSW landfill disposal units must include the following engineering controls:

- A composite liner system, including a DEQ-approved geomembrane liner (at least 60 mils thick for high-density polyethylene, and at least 30 mils thick for approved alternative geomembranes) and at least two feet of compacted soil with an in-place permeability of 1×10^{-7} cm/sec or less, or a DEQ-approved alternative liner pursuant to [40 CFR Part 258.40\(a\)\(1\)](#)
- A primary leachate collection and removal system which fully covers the liner system and maintains a leachate depth of less than a one foot above the liner, per [40 CFR 258.40\(a\)\(2\)](#). All main leachate collection pipes must be serviceable by clean outs
- Unless otherwise approved by DEQ, a secondary leachate collection and removal system(s) designed to effectively monitor the overlying composite-liner system's performance and (1) detect and collect leachate at locations of maximum leak probability; and (2) prevent groundwater intrusion and related monitoring biases
- Unless designed to be serviced by the sump of another disposal unit, a leachate collection sump(s) with a double composite liner system and a leak detection and removal system. Each composite liner must meet the minimum design criteria previously cited in this subsection
- An operations layer that covers and protects the primary leachate collection and removal system and liner system from physical damage

8.3 Design plans

According to a schedule approved by DEQ, or at least six months prior to the anticipated construction date for new disposal units, closure of existing units, or development of other ancillary facilities, the permittee must submit engineering design plans to DEQ for review and approval. The design plans must be prepared and stamped by a qualified Professional Engineer with current Oregon registration and specify and/or provide the following:

- All applicable performance criteria, construction material properties and characteristics, dimensions, and slopes; and
- The design basis and all relevant engineering analyses and calculations.

Reference: Follow DEQ's *Solid Waste Landfill Guidance* to expedite DEQ review of design plans.

8.4 Construction documents

Prior to constructing any landfill engineering controls (e.g., final cover, new disposal unit, or other waste containment facilities or improvements), the permittee must submit complete construction documents and receive DEQ's written approval. The construction documents must:

- Be consistent with the applicable DEQ-approved design plan(s), including accurate translation of design specifications into construction requirements
- Define the construction project team
- Specify material and workmanship requirements to guide the constructor in executing work and furnishing products
- Include a Construction Quality Assurance plan that describes how the project team will monitor the quality of materials and the constructor's work performance and ensure compliance with project specifications and contract requirements

Reference: Follow DEQ's *Solid Waste Landfill Guidance* to expedite DEQ review of the construction documents.

8.5 Construction requirements

The permittee must construct all improvements in accordance with:

- The approved plans and specifications
- Any DEQ imposed conditions of approval
- Any future DEQ approved amendments to the plans and specifications; and
- Unless otherwise approved by DEQ, construction work must begin within 18 months of plan approval

Reference: Follow DEQ's *Solid Waste Landfill Guidance* to expedite DEQ review of the construction documents.

8.6 Construction inspection

During construction of a new landfill disposal unit, final cover system, or any other landfill controls or engineered features, the permittee must provide DEQ with a summary and schedule of planned construction activities to facilitate DEQ's inspection and oversight.

8.7 Construction certification report submittal

Within 90 days of completing construction of a new landfill disposal unit, a final cover system, or other engineering controls, the permittee must submit to DEQ a construction certification report prepared by a qualified independent party. The report must document and certify that the construction of all required components and structures complies with this permit and DEQ-approved design specifications.

8.8 Construction certification report content

The construction certification report must include:

- An executive summary describing the construction project and any major problems encountered
- A list of the governing construction documents
- A summary of all construction and Construction Quality Assurance activities
- The manufacturer's written certifications that all geosynthetic materials conform with project specifications
- Test data documenting that soil materials conform with project specifications
- A summary of all Construction Quality Assurance observations, including daily inspection records and test data sheets documenting that materials deployment and installation conform with project specifications
- A description of the problems encountered, and the corrective measures implemented
- The designer's acceptance reports for errors and inconsistencies
- A list/description of any deviations from the design and material specifications, including justification for the deviations, copies of change orders and recorded field adjustments, and copies of DEQ's written approvals for deviations and change orders
- Signed certificates for subgrade acceptance prior to placement of soil liner and for acceptance of the soil liner prior to deployment of geomembrane liner
- Photographs and as-constructed drawings, including record surveys of the subgrade, soil liner, granular drainage layer and protective soil layer
- For new landfill units, a determination that the constructed unit is stable based on field observation, and review and evaluation of landslide stability monitoring data; and
- The certification statement(s) and signatures of the CQA consultant, designer, and facility owner. One of these representatives must be a Professional Engineer with current Oregon registration.

8.9 Approval to use new disposal units

The permittee must not dispose of solid waste in newly constructed disposal units until DEQ has accepted the Construction Certification Report. If DEQ does not respond to the Construction Certification Report within 30 days of its receipt, the permittee may place waste in the unit.

The permittee may not dispose of waste into a landfill disposal unit that is determined to be moving until it has been stabilized, and the permittee demonstrates to DEQ's satisfaction that the movement did not compromise the integrity of the unit's liner or leachate collection system. The permittee may use waste to construct a stabilizing berm within a landfill disposal unit as permitted by DEQ letter dated December 13, 2021.

9 Recycling Requirements**9.1 Materials**

The permittee must provide a place for receiving the following recyclable materials:

| | | | |
|-------------------------------------|---------------------|-------------------------------------|---------------------------------------------------------|
| <input checked="" type="checkbox"/> | ferrous scrap metal | <input checked="" type="checkbox"/> | hi-grade office paper |
| <input checked="" type="checkbox"/> | motor oil | <input checked="" type="checkbox"/> | non-ferrous scrap metal (including aluminum) |
| <input checked="" type="checkbox"/> | newspaper | <input checked="" type="checkbox"/> | corrugated cardboard and craft paper (brown paper bags) |
| <input checked="" type="checkbox"/> | container glass | <input checked="" type="checkbox"/> | tin cans |

9.2 Recycling depot location

The place for receiving recyclable material must be located at the disposal site or at another location more convenient to the population served by the disposal site. The recycling center must be available to every person whose solid waste enters the disposal site.

9.3 Recyclable material use

All properly prepared, source separated recyclable materials must be reused or recycled, except for used oil and wood waste which may be collected and burned for energy recovery. The permittee cannot dispose of any source separated recyclable material, as defined under [ORS 459.005\(19\)](#).

9.4 Recycling information

The permittee must make publicly available the following recycling information:

- The on-site or off-site location of the recycling center
- The recycling center's hours of operation
- A list of acceptable materials for recycling
- Instructions for preparing source separated recyclable material

9.5 Recycling information signs

A prominently displayed sign must indicate the following:

- The availability of recycling at the disposal site or another location, the sign must indicate the recycling center location, if not at the disposal site
- The materials accepted at the recycling center
- The recycling center's hours of operation (if different than disposal site hours)

9.6 Storage

Unless DEQ approves otherwise, all recyclable materials, except car bodies, white goods and other bulky items must be stored in containers.

SITE CLOSURE

10 Closure Construction and Maintenance

10.1 Worst-case closure plan development

The permittee must develop a conceptual "worst-case" closure plan and a conceptual post-closure plan, obtain DEQ approval of the plans, and maintain up-to-date copies of these plans in the facility's Operating Record.

Reference: The plans must comply with [40 CRF, Part 258, Subpart F](#) and [OAR 340-094-0110](#).

10.2 Notification

The permittee must notify DEQ and receive DEQ approval when the conceptual "worst-case" closure and conceptual post-closure care plans are updated and placed in the operating record.

10.3 Closure permit

In accordance with [OAR 340-094-0100](#), the permittee must apply for a closure permit at least five years prior to the landfill's anticipated final closure.

10.4 Closure plan requirements and approval

At least six months prior to final closure of any portion of the landfill, the permittee must submit detailed engineering plans, specifications, and a closure schedule to DEQ for review and approval.

The design plans must be prepared and stamped by a qualified Professional Engineer with a current Oregon registration and specify and/or provide the following:

- All applicable performance criteria, construction material properties and characteristics, dimensions and slopes
- The design basis and all relevant engineering analyses and calculations

Reference: DEQ's *Solid Waste Landfill Guidance* describes closure plan preparation. Following that format will expedite DEQ review of the plan.

10.5 Closure schedule

The permittee must initiate and complete closure of each landfill disposal unit in accordance with [40 CFR 258.60\(f\) and \(g\)](#), or an alternative schedule approved by DEQ.

10.6 Final cover

Final landfill cover must be designed and constructed to facilitate implementation of the DEQ-approved end use plan for the site property after final closure of the landfill.

Unless DEQ approves otherwise, the final landfill cover must be:

- At least three feet thick as required by [OAR 340-094-0120\(2\)\(a\)](#)
- Designed to minimize infiltration of precipitation as required by [40 CFR Part 258.60](#)
- Graded to compensate for estimated differential settlement and maintain positive drainage such that final (post-settlement) slopes will maintain positive drainage between two percent and 30 percent

10.7 Vegetation

The permittee must establish and maintain vegetation suitable for erosion control and agricultural production over the closed areas of the disposal site consistent with DEQ-approved plans and the final end use of the site.

10.8 Final cover maintenance

The permittee must maintain the final surface contours of the landfill cover such that:

- Erosion is minimized and ponding of water is prevented
- The integrity of the cover system is preserved in accordance with the approved plans

- The site is maintained suitable for the approved end use

The permittee must reconstruct the cover system with approved materials and grade and seed all areas that have settled or where water ponds, and all areas where the cover soil has been damaged or thinned by cracking or erosion. Areas where vegetation has not been fully established must be fertilized, re-seeded and maintained. Any damage repair or other reconstruction of a geomembrane barrier component in the final cover system must be conducted in accordance with a construction quality assurance plan approved by the DEQ.

10.9 Deed record

Within 30 days after the disposal site's final closure, the permittee must record a notation on the deed to the facility property as required by [40 CFR 258.60\(i\)](#) and [OAR 340-094-0130\(1\)\(a\)](#) and submit a copy of the notation on the deed to DEQ.

11 Financial Assurance

11.1 Financial assurance required

The permittee must comply with applicable financial assurance criteria requirements prescribed by [OAR 340-094-0140](#). The permittee must maintain an up-to-date financial assurance plan in the facility Operating Record, and provide financial assurance for landfill closure, post-closure care and, if required, corrective action. The financial assurance provided must:

- Be in the amount required by [OAR 340-094-0140\(5\)](#)
- Be updated, annually, in accordance with [OAR 340-094-0140\(6\)\(e\)](#)
- Consist of a financial assurance mechanism complying with [OAR 340-094-0145](#)

11.2 Financial assurance plan

By June 1 of each year, the permittee must submit an update of the financial assurance plan to the DEQ for review and approval and provide financial assurance for the costs of site closure, post-closure care, and potential corrective action as required in Subsection 11.3. In addition, the permittee must place the plan in the facility file.

Reference: The plan must be prepared in accordance with [OAR 340-094-0140](#). Acceptable mechanisms are described in [OAR 340-094-0145](#).

11.3 Annual recertification of financial assurance

The permittee must annually review and update their financial assurance in accordance with [OAR 340-094-0140\(6\)\(e\)](#). By June 1 of each year, a notarized annual recertification of financial assurance must be submitted to DEQ demonstrating that this review has been completed. If a discount rate is used to estimate costs, the annual update must also include the certifications listed in [OAR 340-094-0140\(6\)\(d\)](#).

11.4 Use of financial assurance

The permittee must not use the financial assurance for any purpose other than to finance the permitted facility's approved closure, post-closure, and corrective action activities or to guarantee that those activities will be completed.

11.5 Continuous nature

The permittee must continuously maintain financial assurance for the facility until DEQ no longer requires that the permittee or other person owning or controlling the site demonstrate financial responsibility for closure, post-closure care, or corrective action.

ENVIRONMENTAL MONITORING

12 Environmental Monitoring Plan

12.1 Environmental monitoring plan

By March 1, 2025, the permittee must submit to DEQ a certification that the DEQ approved environmental monitoring plan remains current, or an updated environmental monitoring plan to DEQ for review and approval. The plan must be prepared and stamped by a geologist, or a Certified Engineering Geologist, with current Oregon registration. Once approved, this plan will become an integral part of the permit.

12.2 Environmental monitoring plan contents

The updated environmental monitoring plan must establish an environmental monitoring program that will characterize potential facility impacts. The updated plan may consist of the previous approved environmental monitoring plan with any subsequent changes or additions (i.e., approved permit-specific concentration limits, revised parameter lists, revised schedules, new wells, etc.). At a minimum, the updated environmental monitoring plan should address the issues and topics found in Section 10 of DEQ's *Solid Waste Landfill Guidance*.

12.3 Environmental monitoring plan revisions and updates

The permittee must revise the current environmental monitoring plan as necessary to reflect current and future environmental conditions, facility development and regulatory requirements. A geologist or Certified Engineering Geologist, with current Oregon registration, must prepare and stamp the environmental monitoring plan revisions.

12.4 Long-term monitoring plan

After DEQ approves any risk-based concentration limits, permit-specific concentration limits, concentration limit variances, action limits, or site-specific limits, the permittee must update the environmental monitoring plan to reflect the long-term monitoring program and submit the updated plan for DEQ review and approval.

Note: Also, see this permit's requirements for establishing permit-specific concentration limits, action limits, or site-specific limits and [OAR 340-040-0030\(4\)](#) for procedures to establish concentration limit variances.

12.5 Additional monitoring points

The permittee must incorporate any new or replacement monitoring point or device into the environmental monitoring plan and submit the updated environmental monitoring plan to DEQ for review and approval.

13 Environmental Sampling Requirements

13.1 Notification of sampling events

The permittee must notify DEQ, in writing, at least ten working days prior to a scheduled sampling event.

13.2 Split sampling events

The permittee must split samples with DEQ at DEQ's request, and schedule split-sampling events with DEQ's laboratory at least 45 days ahead of time.

Oregon Department of Environmental Quality
Laboratory, Groundwater Monitoring Section
7202 NE Evergreen Parkway, Suite 150
Hillsboro, OR 97124

Phone: (503) 693-5700

Fax: (503) 693-4999

The permittee must conduct the following split sampling events with DEQ:

Fall 2028, Spring 2032

13.3 Monitoring schedule

The permittee must refer to the approved environmental monitoring plan for environmental monitoring procedures. Quarterly monitoring benchmarks are defined below:

| If sampling in the... | Schedule the sampling event | |
|-----------------------|-----------------------------|----------------------|
| | On, or after.... | But on, or before... |
| Winter | Jan. 1 | Feb. 28 |
| Spring | April 1 | May 31 |
| Summer | July 1 | Aug. 31 |
| Fall | Oct. 1 | Nov. 30 |

13.4 Interim monitoring

Until superseded by an updated environmental monitoring plan approved by the DEQ, the permittee must conduct all environmental sampling in accordance with the following documents:

- January 28, 2016, Update Environmental Monitoring Plan, Wasco County Landfill, prepared by SCS Engineers; and
- All updates to the Environmental Monitoring Plan

For new or any additional wells, groundwater samples must be collected quarterly on the schedule outlined in Subsection 13.3 until a minimum of nine acceptable data points have been acquired for each monitoring well.

Following DEQ approval, the permittee may commence semiannual groundwater sampling at those wells that have accumulated nine acceptable data points. All semiannual groundwater sampling must be conducted during the spring (April 1 - May 31) and fall (October 1 – November 30) quarters.

13.5 Monitoring after environmental monitoring plan approval

The permittee must monitor the facility in accordance with:

- the approved environmental monitoring plan
- any conditions of DEQ's approval
- any DEQ-approved amendments and updates

13.6 Changes in sampling or split sampling

The permittee must submit a written request and obtain DEQ's written approval before changing the sampling program, including sampling frequency, parameters, or locations. Approved changes will become an integral part of the environmental monitoring plan.

DEQ reserves the right to add to or delete from the list of scheduled sampling events, sampling locations, and sampling parameters, and to conduct unscheduled sampling or split sampling events.

If the split-sampling schedule changes, DEQ will try to notify the permittee at least 30 days prior to the next scheduled event.

14 Establishing Permit-Specific Concentration Limits, Action Limits, Concentration Limit Variances and Site-Specific Limits

14.1 Gathering data

The permittee must monitor the designated background wells in accordance with the approved environmental monitoring plan or propose an alternative intrawell approach. Background monitoring must continue until all necessary data sets have been collected and permit-specific concentration limits, action limits, and/or site-specific limits are proposed for each parameter of concern. The permittee then must demonstrate to DEQ's satisfaction that the selected background-data set is valid and unaffected by facility releases.

14.2 Statistical analysis

To establish compliance concentration limits (permit-specific concentration limits, action limits, and site-specific limits), the permittee must perform statistical evaluations of the monitoring results for each sampling event.

Use methods outlined in [40 CFR 258.53](#) or other DEQ accepted statistical methods.

Reference: The permittee should use methods outlined in Environmental Protection Agency's "Statistical Analysis of Groundwater Monitoring at RCRA facilities" (March 2009) or other DEQ accepted statistical methods. DEQ's 2011 Guidance Document "Developing Concentration Limits at Permitted Solid Waste Facilities" provides some examples of acceptable methods.

14.3 Proposing permit-specific concentration limits, action limits, and/or site-specific limits

The permittee must propose for DEQ's review and approval, permit-specific concentration limits, action limits, or site-specific limits pursuant to the guidelines specified in [OAR 340-040](#). The proposal must address all required parameters. Once a statistically valid data set (at least nine acceptable data points) is established from the appropriate background well(s), the permittee may generate permit-specific concentration limits, action limits, or site-specific limits for each designated, long-term monitoring parameter.

14.4 Changing permit-specific concentration limits, action limits, and/or site-specific limits

If the permittee demonstrates to DEQ's satisfaction that background groundwater quality has significantly changed since the permit-specific concentration limits, action limits, or site-specific limits were established, and if the change is unrelated to the permitted facility's influence, the permittee can propose, to DEQ, a revised level for the affected permit-specific concentration limit(s), action limit(s), or site-specific limit(s).

Note: This does not apply to intrawell comparisons, only to interwell methods.

14.5 Establishing and changing concentration limit variances

The permittee should refer to DEQ's Groundwater Quality Protection Rules [[OAR 340-040-0030\(4\)](#)] for guidance in establishing and changing concentration limit variances.

15 Environmental Monitoring Standards

15.1 Applicable regulatory standard

The permittee must not allow the release of any substance from the landfill into groundwater, surface water, or any other media that will result in a violation of any applicable federal or state air or water limit, drinking water rules, or regulations, beyond the solid waste boundary of the disposal site or an alternative boundary specified by DEQ.

Reference: [OAR 340-094-0080](#).

15.2 Compliance points

This permit establishes compliance points at the following groundwater monitoring locations: MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7 and MW-8.

Landfill Gas Probes: GP-2, GP-3, GP-4, GP-5-33, GP-5-85, GP-6, and D-3

The location of all other environmental monitoring compliance points shall be as established in the updates to the Environmental Monitoring Plan as approved by DEQ.

15.3 Review of results

After each monitoring event, the permittee must review the analytical results according to the following table.

| If monitoring results are... | Then... |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Above any permit-specific concentration limits, concentration limit variances or action limits, or more than two site-specific limits (if established), or if data indicate a significant change in water quality at any monitoring point</p> <p><u>Note:</u> Examples of significant changes:</p> <ul style="list-style-type: none"> • Detection of a volatile-organic-compound or other hazardous constituent that is absent in background water quality • Exceedance of a Table 1 or 3 value listed in OAR 340-040 unless the background water quality is above these numerical limits • Exceedance of a safe drinking water standard or • Exceedance, by an order of magnitude or more, of any compound's background concentration | <ol style="list-style-type: none"> 1. Notify DEQ in writing within 10 days of receipt of laboratory results 2. Perform resampling immediately and evaluate results as described below <p><u>Note:</u> Re-sampling is not required for a known release, previously confirmed in writing to DEQ.</p> |
| <p>None of the above</p> | <p>Continue groundwater monitoring with next scheduled sampling event.</p> |
| <p><u>Note:</u> Established permit-specific concentration limits, concentration limit variances, action limits, and site-specific limits are listed in the approved Environmental Monitoring Plan.</p> | |

15.4 Resampling results

The permittee must review re-sampling results according to the following table.

| If resampling results ... | then ... |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Confirm the exceedance of at least one permit-specific concentration limit or a table 1 or 2 value as listed in OAR 340-040 or concentration limit variance.</p> | <ol style="list-style-type: none"> 1. Notify DEQ in writing within 10 days of receipt of laboratory data, or within 60 days of the sample date (whichever occurs first) 2. Submit, within 90 days of the date of re-sampling, a remedial investigation workplan for DEQ's review and approval. The workplan must specify how the remedial investigation will meet OAR 340-040 objectives, and may need to include provisions for monitoring Groups 4 and 6* parameters in addition to routine detection monitoring <p>*See Attachment 1: Parameter Groups</p> |
| <p>Confirm the significant change in water quality results noted in the routine sampling event or confirm that at least one action limits or more than two site-specific limits were exceeded.</p> | <ol style="list-style-type: none"> 1. Notify DEQ in writing within 10 days of receipt of laboratory data, or within 60 days of the sample date (whichever occurs first) 2. Submit a plan for developing an assessment program to DEQ within 30 days (unless another time period is authorized) |
| <p>Do not confirm the routine sampling results.</p> | <ol style="list-style-type: none"> 1. Continue with routine monitoring 2. Discuss the results of the routine sampling and resampling in the next annual environmental monitoring report |

15.5 Secondary leachate collection system

If the permittee observes liquids in the SCS above levels specified in the EMP, the permittee must respond in accordance with the current approved EMP procedures for sampling, analysis and reporting. If testing confirms the possibility of significant landfill liner leakage or previously unreported impacts in the SCS, the permittee will notify DEQ and follow the procedures outlined in the approved EMP, or discuss appropriate options with DEQ.

The permittee must design each secondary leachate collection system-equipped landfill cell or sub-unit to allow for discrete sampling of the secondary leachate collection system without mixing, co-mingling, or compositing of samples with other leachate sources, until approved by DEQ to combine previously independent secondary systems.

15.6 Methane limits

The methane concentration must not exceed:

- 25 percent of methane's lower explosive limit in onsite structures (excluding gas control structures or gas recovery system components); or
- Methane's lower explosive limit at the facility property boundary

Note: Methane's lower explosive limit is equal to a concentration of five percent by volume in air.

15.7 Methane exceedance

If methane levels exceed the specified limits, the permittee must:

1. Take immediate steps to protect human health and safety and notify DEQ within 24 hours
2. Within seven days of detection, confirm the measures taken to protect human health and safety (unless DEQ approves an alternative schedule), and describe the methane test results and response measures in the facility operating record
3. Within 60 days of the methane exceedance, develop and implement a remediation plan, incorporate the plan into the monitoring records, and submit a progress report to DEQ

16 Recordkeeping and Reporting – Environmental Monitoring

16.1 Annual environmental monitoring report

By March 31 of each year, the permittee must submit to DEQ two copies of an annual monitoring report for the past year's monitoring period (Jan. 1 to Dec. 31) as described in Section 1.3. The report must conform to the approved environmental monitoring plan format and be prepared and stamped by a geologist or a Certified Engineering Geologist, with current Oregon registration.

16.2 Statement of compliance

The annual environmental monitoring report must include a brief (approximately one-page) cover letter that:

- Compares the analytical results with the relevant monitoring standards (risk-based concentrations, permit-specific concentration limits, concentration limit variances, action limits, or site-specific limits)
- Documents any exceedances of federal or state standards for relevant media
- Documents any significant change in water quality, land quality, air quality or methane levels in monitored media

16.3 Annual environmental monitoring report contents

The annual environmental monitoring report must reflect the facility's current conditions, present accurate data that corresponds with the original field and lab data, and include the following elements unless otherwise approved in the Environmental Monitoring Plan:

- A review of the past year's significant events at the site
- An evaluation of the monitoring network performance and a summary of any recommended changes

- A summary of all the past year's sampling data for, but not limited to groundwater, surface water, leachate, landfill gas (including any air sampling data), and soil
- A summary of any data quality problems (e.g., quality assurance/quality control failures, flagged data, switched samples, etc.)
- Piezometric maps for each sampling event and each groundwater bearing zone monitored
- Time history plots for field specific conductivity, dissolved oxygen, and all group 1b and group 2a and 2b parameters
- Box plots for field specific conductivity, dissolved oxygen, and all group 1b and group 2a and 2b parameters in conjunction with the comprehensive monitoring events
- An anion-cation balance for each sample event at all monitoring points for which there is adequate data. Include an additional explanation for any balance outside of $\pm 10\%$ in error
- An electronic copy of all the past year's field and lab data, including all chain of custody forms
- A summary of the leachate management program designed and operated to comply with Subsections 3.5 and 7.19. The summary must include leachate and liquid volumes collected and removed from each primary and secondary leachate sump; volumes of leachate recirculated by each approved technology; and an evaluation of whether or not there is any significant landfill liner leak based on sampling and analysis of any liquids detected in the secondary leachate collection systems.

Reference: The report format should reflect DEQ's *Solid Waste Landfill Guidance*.

16.4 Split sampling submittal

Within 90 days of any split sampling event, the permittee must submit the following information to DEQ's laboratory:

- A copy of all information pertinent to the sample collection handling, transport, and storage, including field notes
- Copies of all laboratory analytical reports
- Copies of all laboratory quality assurance/quality control reports
- Any other data or reports requested by DEQ

Report all split sampling information to the Oregon Department of Environmental Quality Laboratory as described in Subsection 13.2.

16.5 DEQ response to split samples

If the permittee submits all required split sampling data and requests DEQ's results, DEQ's lab may provide, to the permittee, copies of the following information:

- DEQ's analysis of the split sample
- The quality assurance/quality control report
- The analytical report
- The field data sheets

17 Environmental Monitoring Network

17.1 Monitoring stations, devices, and equipment

To ensure that every sample is representative of the site's environmental conditions, the permittee must protect, operate, and maintain all environmental monitoring stations and equipment in accordance with DEQ's requirements.

To facilitate sample collection and/or inspection and maintenance activities, the permittee must maintain reasonable all-weather access to all monitoring stations and associated equipment.

17.2 Reporting equipment damage

Within 14 days of discovering any damaged monitoring equipment or station, the permittee must submit to DEQ a report describing the damage, the proposed repair or replacement measures, and the schedule to complete this work.

Example: A well's impaired function or altered position/location.

17.3 Monitoring device construction

The permittee must complete any monitoring well or gas monitoring probe abandonment (decommissioning), replacement, repair, or installation in a manner that complies with the Water Resources Rules, [OAR 690-240](#).

17.4 Reporting well construction and repairs

The permittee must document all monitoring well or dedicated gas monitoring probe repair and construction activities, including geologic logs, well location information, and construction information in a report prepared and stamped by a Geologist or Certified Engineering Geologist, with current Oregon registration. The permittee must submit to DEQ, within 30 days of the action, copies of the driller's well reports sent to the Oregon Water Resources Department, and a final report in accordance with the approved workplan.

17.5 Monitoring device decommissioning or replacement

The permittee must submit a written recommendation to DEQ prior to decommissioning or replacing any well or gas monitoring probe in the monitoring network. After receiving DEQ's approval, the permittee must decommission or replace any well or gas probe that meets the following criteria:

- The well or gas probe was installed in a borehole that hydraulically intersects two saturated strata
- The permittee lacks supporting documentation demonstrating that the well or gas probe was properly installed and constructed
- The well or gas probe was damaged beyond repair or destroyed
- Other reasons as determined by either the permittee or DEQ

COMPLIANCE SCHEDULE

18 Summary of Due Dates

18.1 Summary

The permittee must comply with the event-driven schedule shown below. This compliance schedule does not apply to many of the routine reporting requirements specified in other sections of the permit.

| Due Date | Activity | See subsection... |
|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| March 1, 2025 | Submit an updated Environmental Monitoring Plan or certify the existing plan is still current | 12.1 Environmental monitoring plan |
| Within 120 days of operations plan approval | Update the operations and maintenance manual | 5.4 Operations and maintenance manual |
| EMERGENT: | | |
| Immediately | Oregon Emergency Response System notification of reportable spill | 7.7 Oil and hazardous material spill response and reporting |
| Immediately upon methane exceedance identification | Take steps to protect human health and safety, promptly notify DEQ | 15.7 Methane exceedance |
| Immediately when the liquid depth of in a LCRS or SCS sump exceeds 12 inches above the "pump-on" setting | Notify DEQ | 7.19 Leachate management systems |
| Immediately upon identification of permit violation | Take corrective action for permit condition violation and notify DEQ | 6.2 Non-compliance reporting |

| Due Date | Activity | See subsection... |
|----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| Discovery of fire | Immediately and thoroughly extinguish fire. Notify DEQ within 24 hours of discovery. | 7.24 Fire protection and reporting |
| Within 24 hours of discovery of prohibited waste known or suspected to be hazardous, explosive, radioactive or infectious. | Notify DEQ of prohibited waste and take digital photos. For hazardous prohibited waste, initiate procedures to identify and remove. For non-hazardous prohibited waste, begin to isolate or remove. | 7.5 Discovery of prohibited waste |
| Within seven days of methane exceedance | Confirm protective measures, describe results and measures in facility operating record | 15.7 Methane exceedance |
| Within 10 days of receipt of lab results with exceedance(s) | Notify DEQ of monitoring exceedance(s) | 15.3 Review of results, 15.4 Resampling results |
| Within 14 days of discovery of monitoring equipment or station damage | Submit report to DEQ | 17.2 Reporting equipment damage |
| Within 30 days of confirmed significant change in water quality results | Submit assessment plan to DEQ | 15.4 Resampling results |
| Within 60 days of methane exceedance | Develop and implement remediation plan, submit progress report to DEQ | 15.7 Methane exceedance |
| Within 60 days of discovery of landfill gas equipment damage/compromise | Replace or repair equipment, submit written inspection report to DEQ | 7.24 Landfill gas control system operation and maintenance |
| Within 60 days of discovery of non-hazardous prohibited waste | Transport non-hazardous prohibited waste to authorized facility | 7.5 Discovery of prohibited Waste |
| Within 90 days of discovery of hazardous or suspected hazardous waste | Remove hazardous waste | 4.1 Prohibited waste 7.5 Discovery of prohibited waste |
| Within 90 days of resampling date | Submit remedial investigation work plan to DEQ | 15.4 Resampling results |
| Within 60 days of discovery of surface water structural damage/malfunction | Notify DEQ and complete repairs | 7.19 Drainage |
| RECURRENT: | | |
| Last day of month following end of calendar quarter | Submit solid waste disposal report/fee calculation form to DEQ | 6.5 Procedures step 5 |
| By Jan. 25 for each year | Submit amount of material recovered for recycling/other beneficial purposes to DEQ washed representative | 6.5 Procedures step 6 |
| By March 31 of each year | Submit an Annual Environmental Monitoring Report | 16.1 Annual environmental monitoring report |
| By June 1 of each year | Submit annual financial assurance recertification | 11.3 Annual recertification of financial assurance |
| SAMPLING: | | |

| Due Date | Activity | See subsection... |
|---------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------|
| At least 10 working days prior to scheduled sampling event | Notify DEQ | 13.1 Notification of sampling events |
| At least 45 days prior to split sampling event | Schedule split sampling event with DEQ laboratory | 13.2 Split sampling events |
| Within 90 days of split sampling event | Submit required data/documents to DEQ laboratory | 16.4 Split sampling submittal |
| EVENTS: | | |
| Within 18 months of plan approval | Begin construction | 8.5 Construction requirements |
| At least six months before any new disposal unit construction | Submit design plans | 8.3 Design plans |
| Within 90 days after completion of any major construction | Submit construction certification report | 8.7 Construction certification report submittal |
| At least six months prior to closing any portion of the landfill | Submit design plans | 10.4 Closure plan requirements and approval |
| Within 30 days of any monitoring well or gas probe construction or repair | Submit construction/repair report | 17.4 Reporting well construction and repairs |
| SELDOM: | | |
| At least 10 days in advance of ownership or operator change | Notify DEQ | 2.4 Changes in name or address |
| Five years prior to final closure | Submit closure permit application | 10.3 Closure permit |
| Within 30 days of final site closure | Modify property deed record | 10.10 Deed record |

ATTACHMENTS

19 Attachment 1: Parameter groups

19.1 Overview

This attachment describes the environmental-monitoring parameter groups and associated requirements. Due to the duration of this permit, suggested analytical methods may change. If that is the case, use the most currently promulgated Environmental Protection Agency method or DEQ-approved equivalent.

Note: Method means EPA SW 846 Methods [suggested methods are in square brackets].

19.2 Group 1a: Field indicators

The **field indicators parameter group** includes the following parameters:

- Elevation of water level
- pH
- Dissolved Oxygen
- Specific conductance
- Temperature
- Eh

With instruments calibrated to relevant standards, measure these parameters in the field when collecting samples. Acceptable methods include:

- Down-hole in situ
- In a flow-through cell
- Immediately following sample recovery

19.3 Group 1b: Leachate indicators

The **laboratory indicators parameter group** includes the following parameters:

- Hardness (as CaCO₃)
- Total Alkalinity (as CaCO₃)
- Total Organic Carbon (TOC)
- pH (lab)
- Specific Conductance (lab) [Method 9050A]
- Total Dissolved Solids (TDS)
- Total Suspended Solids (TSS)*
- Chemical Oxygen Demand (COD)
- Tannin/Lignin

Proper techniques for sample handling, preservation, and analysis are specific to each individual analyte: Follow appropriate EPA techniques or the most recent version of the Standard Methods for the Examination of Waste and Wastewater, published by the American Public Health Association, American Water Works Association, and Water Environment Federation.

Note these special considerations for Total Suspended Solids:

| If the TSS concentration is... | ...then analyze for: |
|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| Less than or equal to 100.0 mg/L in the sample | Total concentrations (unfiltered) |
| Greater than 100.0 mg/L in the sample | Both total (unfiltered) and dissolved (field-filtered) |
| Field-preserve samples according to standard DEQ and/or EPA guidelines and analyze by EPA Method 6010C or DEQ-approved equivalent. | |

19.4 Group 2a: Common anions and cations

The common anions and cations parameter group includes the following parameters:

- Calcium (Ca)
- Sulfate (SO₄)
- Ammonia (NH₃)
- Sodium (Na)
- Nitrate (NO₃)
- Silica (SiO₂)
- Iron (Fe)
- Fluoride (F)
- Manganese (Mn)
- Magnesium (Mg)
- Chloride (Cl)
- Carbonate (CO₃)
- Potassium (K)
- Bicarbonate (HCO₃)
- Ammonium (NH₄)

Dissolved concentrations must be measured. Field-filter and field-preserve samples according to standard DEQ and/or Environmental Protection Agency guidelines and analyze by appropriate EPA techniques or the most recent version of the Standard Methods for the Examination of Waste and Wastewater, published by the American Public Health Association, American Water Works Association, and Water Environment Federation. Report results in mg/L and meq/L.

19.5 Group 2b: Trace Metals

The trace metals parameter group includes the following parameters:

- Antimony (Sb)
- Arsenic (As)
- Barium (Ba)
- Beryllium (Be)
- Cadmium (Cd)
- Chromium (Cr)
- Cobalt (Co)
- Copper (Cu)
- Lead (Pb)
- Nickel (Ni)
- Selenium (Se)
- Silver (Ag)
- Thallium (Tl)
- Vanadium (V)
- Zinc (Zn)

19.6 Group 3: Volatile organic constituents

Analyze for all compounds detectable by EPA Method 8260B and include a library search to identify any unknown compounds present. The volatile-organic-compounds parameter group is equivalent to the EPA Method 8260B list.

DEQ must pre-approve alternative methods like EPA Method 8021B.

19.7 Group 4: Assessment monitoring

The assessment monitoring parameter group includes the following parameters:

- Semi-volatile organic constituents, including phenols, EPA Method 8270D
- Mercury, EPA Method 7470A
- Cyanide, EPA Method 9010C (manual distillation) or 9012B (automated distillation)
- Nitrite

All Method 8270D analyses must include a library search to identify any unknown compounds present.

19.8 Group 5: Surface water and leachate

The surface water parameter group includes the following parameters:

- Total Kjeldahl nitrogen (TKN)
- Total phosphorus (P)
- Orthophosphate (PO₄)
- Biological oxygen demand (BOD)
- Total halogenated organics (TOX) [EPA Method 9020B]
- Total coliform bacteria [EPA Method 9131]
- Fecal coliform bacteria [EPA Method 9131]
- E. Coli

19.9 Group 6: Other assessment parameters

Additional assessment parameters include the following:

- Dioxins and furans [EPA Methods 8280B and/or 8290A]
- Phenolics [EPA Methods 9065, 9066, and 9067]
- PCBs [EPA Methods 8082A and 8270D]
- Pesticides, herbicides and fungicides [EPA Methods 8081B, 8141B, 8151A, 8270D]

20 Attachment 2: Permit-Specific Concentration Limits, Action Limits, and Site-Specific Limits

Permit-specific concentration limits, concentration limit variances, action limits, and site-specific limits are located in the current, DEQ approved Environmental Monitoring Plan.

Date: April 03, 2024

REVIEW REPORT

To: Ron Doughten, Manager Solid Waste, Eastern Region, DEQ

From: Todd Hesse, The Dalles Office, Eastern Region, DEQ

Subject: Permit Renewal
Wasco County Landfill
Wasco County
Permit # 53

INTRODUCTION:

Wasco County Landfill is a regional municipal solid waste landfill that is subject to state and federal requirements under OAR 340-094 and 40 CFR 258 for municipal solid waste landfills, including operating criteria, design criteria, groundwater monitoring and corrective action, closure and post-closure care, and financial assurance.

Wasco County Landfill began permitted operations as an MSW landfill in 1973 and serves the mid-Columbia counties that include Wasco and Hood River counties in Oregon, parts of Klickitat and Skamania Counties in Washington, as well as other areas of the Pacific Northwest.

The current permit was issued on December 11, 2014, and expires on September 1, 2024. Wasco County Landfill (WCL) submitted a renewal application on September 21, 2023, for Solid Waste Disposal Site Permit No. 53 issued for the WCL. Land Use Compatibility Statements signed 03/19/1997 and 12/01/2000 allow for a land disposal site.

Until a renewal permit is issued, WCL is authorized to continue operating under its existing Solid Waste Disposal Site Permit No. 53 issued on December 11, 2014, with three addendums.

DEQ has prepared a draft renewal permit in response to the application. This renewal permit, if issued as proposed, will allow Wasco County Landfill to continue operating for the standard 10-year permit term.

DEQ has reviewed the permittee's application for this renewal and identified no substantive changes from how this landfill has operated under the current permit term.

FACILITY DESCRIPTION:

Location

The WCL is located about 2 miles south of the east end of The Dalles, OR. Oregon DEQ Solid Waste Disposal Permit No. 53 permit allows development of up to 213.19 acres for landfill disposal. The 2019 Site Development Plan for WCL by Vista Geo-Environmental Services includes a limit of waste area of 169.16 acres.

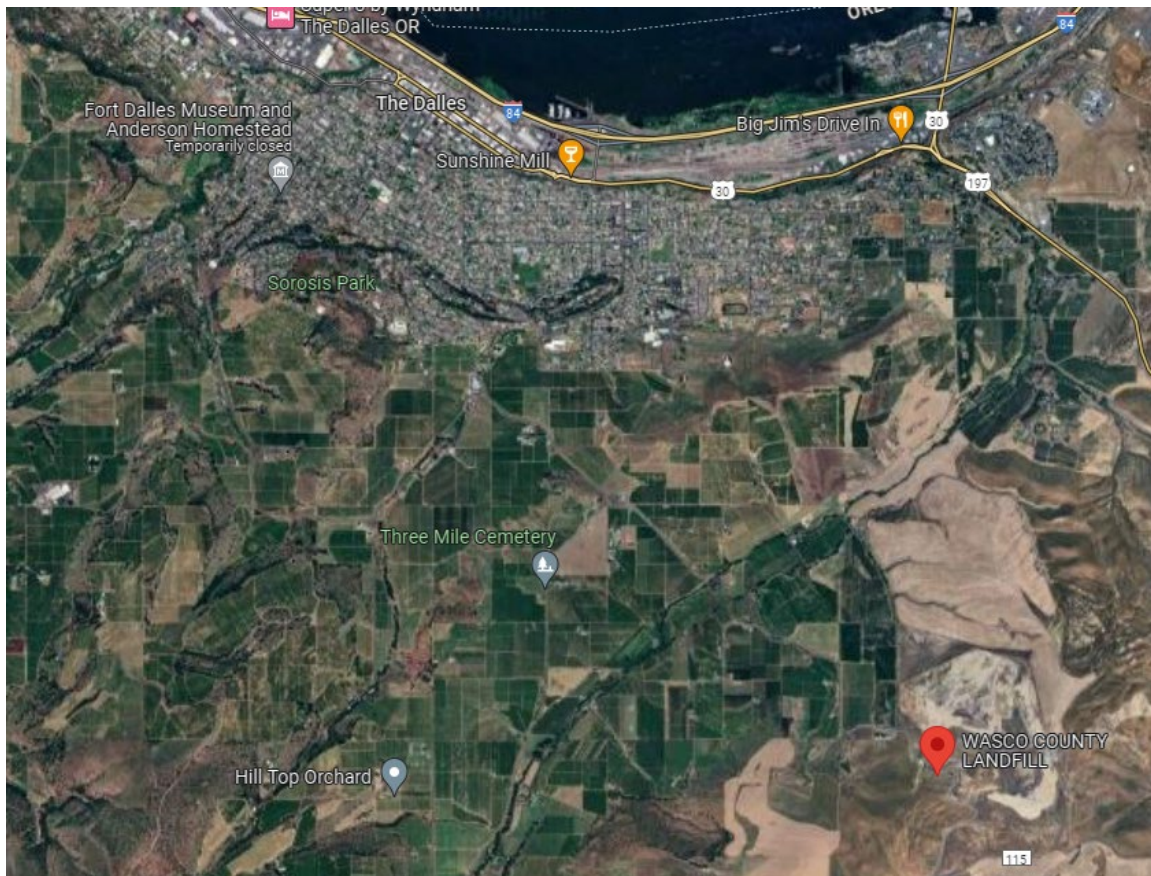


Figure 1. WCL facility location map.

As depicted in Figure 2, reproduced from Drawing No. 3 of the 2019 Site Development Plan, WCL Inc. owns the 331.63 acres property footprint consisting of tax lot 01N 13E o 100 at 168.84 acres and tax lot 01N 13E 13 200 at 162.79 acres.

The landfill is situated in a predominantly rural and agricultural area with cherry and wheat farms adjacent to the property.

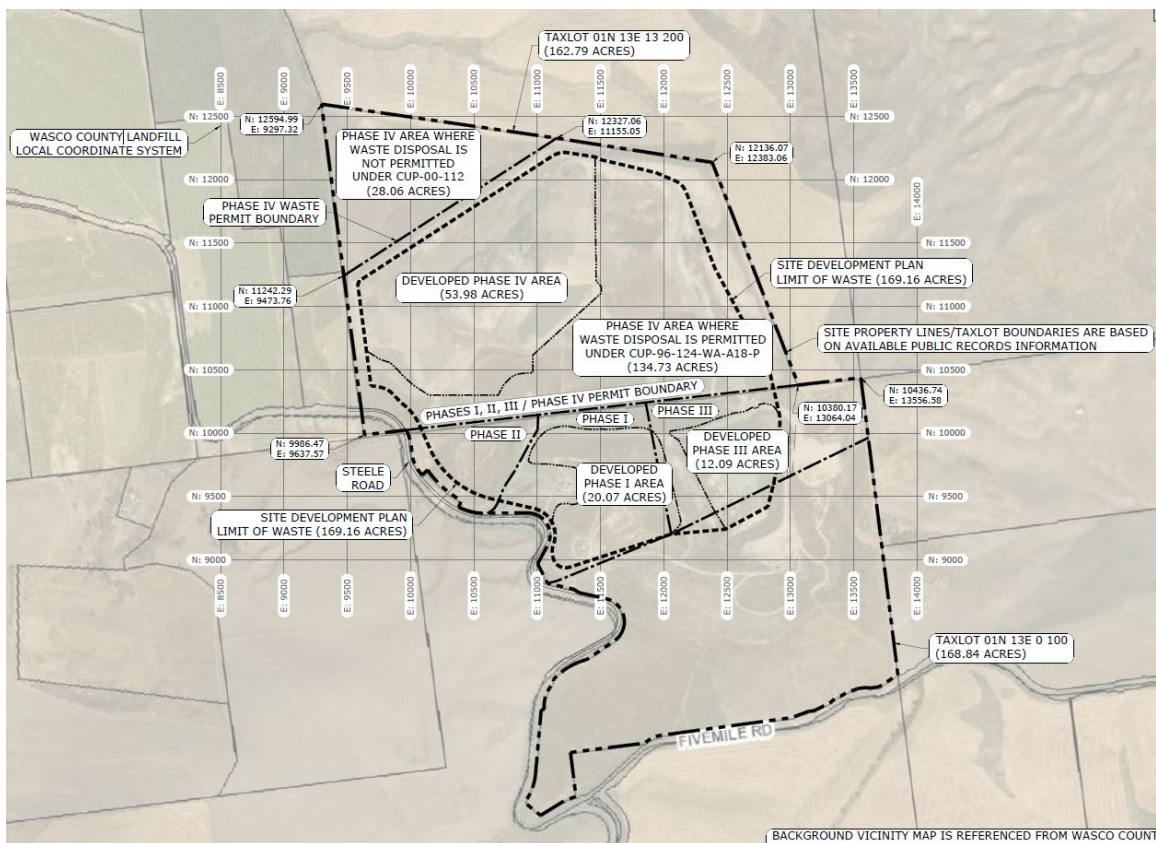


Figure 2. WCL Phases and acreages

Site Development

Waste Connections Inc. purchased the landfill in 1999. The following information on cell development year built and area is reproduced from the approved plans and specifications for the construction of Cell 3i. Cell 31 is the most recent cell approved for placing waste. Additional cell development will occur in Phase IV over the next permit cycle of ten years. Currently WCL has approximately 30 years of useful life remaining.

| PHASES I & III DISPOSAL AREAS | | |
|-------------------------------|------------|-----------|
| PHASE | YEAR BUILT | AREA (AC) |
| CELL IIIA | 1995 | 7.36 |
| CELL IIIB | 1997 | 2.67 |
| CELL IIIC | 1999 | 2.05 |
| PHASE I | PRE - 1995 | 20.07 |
| PHASES I & III | TOTAL | 32.16 |

| PHASE IV DISPOSAL AREAS | | |
|-------------------------|------------|-----------|
| PHASE | YEAR BUILT | AREA (AC) |
| CELL 1 | 2001 | 6.29 |
| CELL 1A | 2003 | 1.14 |
| CELL 1B | 2011 | 1.52 |
| CELL 2 | 2002 | 5.47 |
| CELL 2A | 2011 | 3.29 |
| CELL 2B | 2014 | 0.50 |
| CELL 2C | 2020 | 9.32 |
| CELL 3A | 2004 | 6.84 |
| CELL 3B | 2005 | 5.03 |
| CELL 3C | 2007 | 4.50 |
| CELL 3D | 2010 | 2.71 |
| CELL 3E | 2014 | 4.85 |
| CELL 3F | 2016 | 2.18 |
| CELL 3G | 2016 | 3.57 |
| CELL 3H EAST | 2017 | 1.03 |
| CELL 3H WEST | 2017 | 5.07 |
| CELL 3I | 2022 | 6.19 |
| PHASE IV | TOTAL | 69.50 |

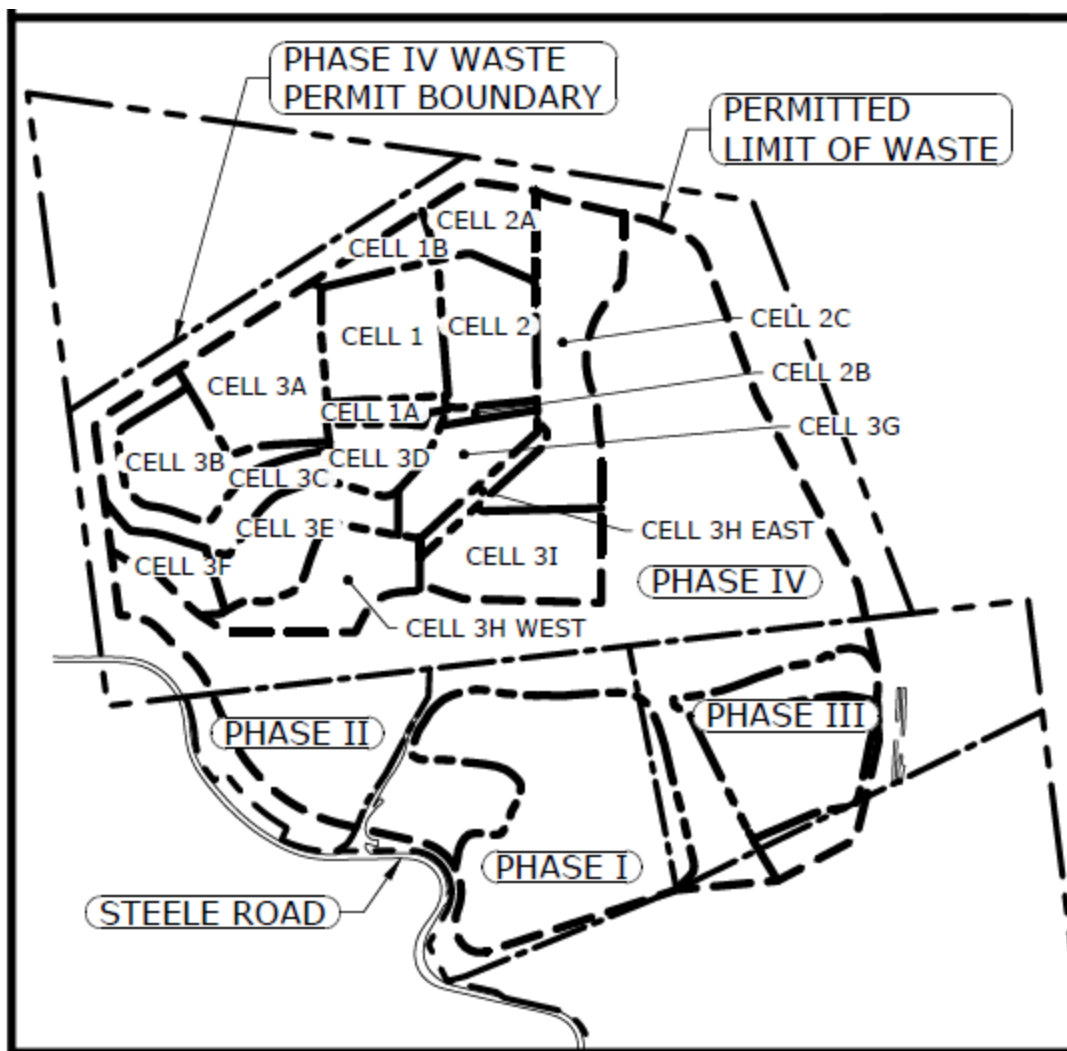


Figure 3. WCL phase and cell location map

From 2004 to 2022, an average of 557,500 tons of waste per year were disposed at the WCL (Figure 4). From 1990 through 2022, approximately 12,000,000 tons of waste have been placed in the landfill. Under landfill gas emission rules adopted by the Oregon Environmental Quality Commission in October 2021, the facility has obtained a Title V Permit from DEQ's Air Quality program.



Figure 4. Annual waste received (in tons) at the WCL from 2004 to 2022.

The proposed renewal permit is limited to the same 331-acre landfill site and operation. Site development at the WCL is currently guided by the April 2019, Site Development Plan for Wasco County Landfill, Wasco County, Oregon, as approved by DEQ letter dated October 9, 2019.

LANDFILL SETTING

The following information is reproduced or sourced from the 2019 Site Development Plan by Vista GeoEnvironmental Services.

Climate

The Dalles, approximately 3 miles north from the WCL, shows the average annual rainfall is 14.5 inches, and the average annual snowfall is 6 inches. Evapotranspiration for Moro, about 30 miles south of The Dalles, is reported as about 56 inches annually. A search for evapotranspiration results closer to the landfill did not find anything. It is expected that evapotranspiration at the landfill is less than Moro, but still higher than the average annual precipitation which benefits the landfill regarding leachate production.

Topography

The higher elevations at WCL are along the southern boundary of the property at around 1,100 feet, while the lowest site elevation is 640 feet along the northern property line in the Phase IV area. The maximum relief across the site is about 460 feet. Slopes throughout much of the site range from about 15 to 25 degrees, but are as steep as 35 degrees in some locations.

Geology

The subsurface conditions at the site consist of surficial topsoil, slide debris associated with ancient landslide terrain, and intact soil overlying the Chenoweth Formation. Landslide debris covers most of the southern two-thirds of the property and is composed of medium dense to very dense, brown, silty fine sand and fine sandy silt interbedded with stiff gray-brown, clayey silt and silty clay. The intact soil in the northern portion of the property consists of medium dense to very dense, brown, fine sandy silt and silty fine sand. The slide debris and intact soils are generally 20- to 120-feet thick and derive from the weathering of the underlying Chenoweth Formation, which at WCL consists of several hundred feet of heterogeneous conglomerate, siltstone, and sandstone and is notable for its lack of strata continuity. Basalt flows of the Columbia River Basalt Group underlie the Chenoweth Formation.

Groundwater

Shallow groundwater seeps were encountered during the construction of Cell C in Phase III and a sump drain collection system (SDCS) was constructed below the liner system. Additionally, underdrains and SDCSs were installed in Phase IV to manage potential groundwater seeps below the cells during construction. Where present, these shallow groundwater seeps likely result from perched zones above the ancient landslide slip plane with recharge from precipitation, or on-site stormwater that collects in topographic depressions.

The upper groundwater zone (UGWZ) below the site occurs in the Chenoweth Formation. Depths to groundwater vary from about 230 to 300 feet across the site, with corresponding groundwater elevations ranging from about 504 feet AMSL in MW-7 (on the north side of Phase IV) to 630 feet AMSL at MW-1 (north of Phase III). Groundwater elevations below the site typically fluctuate less than 1.5 feet during the year.

Deeper groundwater occurs at an elevation of about 325 feet AMSL in basalts of the Columbia River Basalt Group, which underlies the Chenoweth Formation. The deeper groundwater is separated from the UGWZ by approximately 175 feet. No monitoring wells at WCL are screened in the basalt aquifer.

Historical Landslide and Ground Movements

WCL is partially situated within ancient landslide terrain. Based on the subsurface geologic and geotechnical site characterization, the ancient landslides at WCL have been interpreted as a combination of translational and earth flow slides. The translational slides are in the southern portion of the site beneath Phase I and III and a portion of the east side of Phase IV. The translational landslides transition into a series of smaller earth flow slides in the southern and central portions of Phase IV. The northern end of the site is a stable ridgeline which has not experienced landslide activity in the geologic past.

Sesimic Conditions

WCL is not in a fault area. There are no faults within 200 feet of the landfill that have been active in the Holocene epoch. There are several mapped faults within 5 miles of the landfill; these have also not been active during the Holocene epoch.

The landfill is located within a seismic impact zone, identified as a location with a 10 percent or greater probability of an earthquake with a maximum horizontal acceleration on bedrock of more than 0.1g in the next 250 years. This probability of exceedance corresponds to an earthquake with an approximate return period of 2,500 years.

From an engineering perspective, the subsurface soils at WCL should perform well in an earthquake due to the high stiffness and density of the overburden soils and the absence of groundwater within the soils. The site is not considered susceptible to liquefaction or significant seismic-induced settlement.

ENVIRONMENTAL RISK MANAGEMENT

Information in the following sections is reproduced from the September 2021 Operations Plan by Vista GeoEnvironmental Services.

Authorized Activities

The facility's Operations Plan, dated September 2021, describes operations and maintenance activities at the site. The WCL is primarily used for the disposal of municipal solid waste. However, WCL landfill has approved handling procedures for the following specific wastes, which require specialized handling procedures:

| | |
|---------------------------------------------------------|----------------------------------------|
| Agricultural Wastes | Auto Shredder Residue |
| Construction and Demolition Wastes | Large Dead Animals |
| Oil Wastes | Off-spec Biosolids |
| Infectious Wastes | Sewage Sludge and Septage |
| Asbestos Containing Materials | Liquid Wastes for Solidification |
| Abrasive Blast Media Containing Pesticides | Paper Mill Waste |
| Pesticide Treated Wood | Radioactive Materials |
| Ash | Shredded Tires |
| Polychlorinated Biphenyls | Sulfur Wastes |
| Cleanup Materials Contaminated with Hazardous Substance | Bovine Spongiform Encephalopathy Waste |
| Pesticide Containing Wastes | Wildfire Ash and Debris |

WCL is authorized to accept polychlorinated biphenyl containing solid waste that is exempt from regulation under the Toxic Substances Control Act (TSCA) and contains PCBs in concentrations statistically less than 50 parts per million (ppm).

WCL is authorized to accept cleanup materials contaminated by hazardous substances as defined by OAR 093.0030, which means “contaminated materials from the cleanup of releases of hazardous substances into the environment, and which are not hazardous wastes as defined by ORS 466.005.” This reference applies primarily to materials that are removed from the site of contamination for treatment and/or disposal.

Only exempt radioactive materials as defined in OAR 345-050 area approved for disposal at WCL; all other radioactive materials are prohibited for disposal.

Surface Water and Stormwater Control

WCL has a National Pollutant Discharge Elimination System 1200z permit for the discharge of industrial stormwater. The Stormwater Pollution Control Plan is a stand-alone document detailing storm water management procedures for WCL, including clean run-on (i.e., water from off-site drainage basins that drains onto the property), clean run-off (i.e., precipitation that runs off impermeable surfaces such as roadways, parking areas, landscaped areas, and covered portions of the landfill), conveyance systems, and detention basins.

Storm water management has the following objectives:

- Prevent run-on storm water from entering active portions of the landfill and contacting waste;
- Ensure that run-off storm water is separated from the waste and does not result in unnecessary leachate generation; and
- Maintain functionality of all the storm water management facilities with little or no erosion.

To meet these objectives haul roads are graded to promote drainage and ditches and drainage structures are maintained to accommodate storm water flows. To the extent possible storm water is directed to ditches that drain to the detention pond in the Phase II area of the site. This detention pond has a capacity of 7.2 acre feet, and is constructed with a spillway and lined with an 18-inch thick layer of low-permeability soil. Other storm water is routed to the north of the site to a second storm water detention basin.

Leachate

Leachate collection and removal systems (LCRSs) are present throughout the Phase III and IV areas and consist of a layer of free draining material (gravel and/or drainage geocomposite) with perforated collection pipes set in trenches, which slope at a minimum of two percent to primary collection sumps. Additionally, in both Phases III and IV, secondary collection systems (SCSs) are located beneath the primary liners, below the LCRS trenches. The leachate at WCL is recirculated into the waste, no leachate is discharged to the environment or sent to a wastewater treatment plant.

Pumps remove leachate from the collection systems to ensure that no more than 1 foot of leachate is present above the liner systems. Recirculation of leachate begins with the tank configuration. From the sumps, leachate is pumped through riser pipes into two (2) 6,600-gallon polypropylene tanks (10-foot diameter and 12.6-foot tall) located inside a reinforced concrete secondary containment structure. Recirculation of leachate is intended to occur in two ways: Option 1 is to re-circulate via a designated tanker truck and Option 2 is to pump leachate into gravel-filled (or other relatively free draining material) infiltration trenches or pits constructed in the waste to allow leachate to percolate back into the landfill. Option 1 is the preferred method of recirculation.

Landfill Gas

Landfill gas (LFG) is collected in a gas collection and control system installed at the landfill in June 2022 and combusted in a flare that is regulated by a DEQ Air Quality Permit. Potential LFG migration from the WCL is monitored via a network of five LFG probes installed around the perimeter of the WCL site.

Groundwater monitoring

There have been seven (7) groundwater monitoring wells used along the perimeter of WCL and one groundwater monitoring well in the interior of the WCL property to monitor the uppermost aquifer beneath the site, approximately 230-300 feet below ground surface.

The groundwater that underlies the landfill occurs in the Chenoweth Formation, which is comprised of sediments and sedimentary rocks that originated from volcanic activity in the Cascade Range to the west. The Chenoweth Formation consists of deposits of siltstone, claystone, lapilli tuff, tuff breccia, tuffaceous sandstone, sandstone, conglomeratic tuffs, and layers of sand and gravel. On site, the formation is heterogeneous and notable for its lack of horizontal continuity of the strata within the formation. The stratigraphic sequence can be generally summarized as fine-grained material, including silts.

Environmental monitoring at the facility is described in the Environmental Monitoring Plan (EMP). The most recent update to the EMP was completed by SCS Engineers in January 2016 and has been approved by DEQ. Groundwater monitoring includes standard water quality constituents for landfill in the following categories:

- Field indicators
- Leachate indicators
- Common anions and cations
- Trace metals
- Volatile organic compounds

Groundwater monitoring results reviewed by DEQ hydrogeologists have not indicated any release from the site that has impacted groundwater.

Closure and post-closure care

The WCL has approximately 30 years of remaining useful life. The Site Development Plan describes the final cover:

- Consistent with the limit of waste grades developed during the preparation of the Subgrade Plan
- Maximum top elevations consistent with the 2003 Site Development Plan
- Modifies the 107-foot wide stability bench in the 2003 SDP to a 50-foot wide stability bench to increase the mass of the landfill acting as a buttress outside the limits of the ancient slide terrain;
- Has a maximum final cover slope of 3H to 1V to the north of the stability bench and more shallow slopes south of the stability bench (typical slopes of 3.5H to 1V) , and 5 percent minimum slope;
- A final cover depth of 3.5 feet including a low permeability barrier layer, geomembrane, drainage layer and vegetative layers.
- Includes 30-foot wide access roads on the final cover, for two-way traffic
- Includes stormwater ditches that will slope at approximately 5 percent to the run-off ditches on the landfill side of the perimeter road.

DEQ will require at least 30 years of monitoring and maintenance of the closed WCL before considering termination of the closure permit.

Financial Assurance

Wasco County Landfill, Inc. provides Financial Assurance through a surety bond guaranteeing performance. Wasco County Landfill, Inc. submitted their annual Financial Assurance documents on April 21, 2023. DEQ has reviewed the most recent FA submittal and found the FA documents to be in compliance. DEQ approved FA for Wasco County Landfill, Inc. on April 28, 2023.

OTHER PERMITS:

Air emissions from the WCL and related activities are regulated by Oregon Title V Operating Permit No. 33-0007-TV-01, issued by DEQ's Air Quality program for the WCL site.

WCL has a National Pollutant Discharge Elimination System 1200z permit for the discharge of industrial stormwater.

COMPLIANCE HISTORY:

Since 2010 there have been the following formal enforcement actions by DEQ:

- **DEQ Solid Waste program issued a February 24, 2010 Warning Letter with Opportunity to Correct** for liquid waste overtopping the tank used to solidify liquid waste and for using autoshredder residue as daily cover with insufficient soil or other non-flammable ADC. WCL took measures to eliminate spillage of liquids from the solidification tanks and to properly blend the autoshredder residue with soil for use as ADC.

- **DEQ Solid Waste program issued a May 21, 2010 Warning Letter** for receipt of anhydrous magnesium chloride, magnesium metal, sulfides and other constituents. The EPA determined and DEQ agreed that the waste magnesium chloride salts are a RCRA hazardous waste. This waste is monitored quarterly for temperature and carbon monoxide to ensure the waste is stable.
- **DEQ Solid Waste program issued an August 26, 2013 Warning Letter with Opportunity to Correct** for improper recirculation of leachate into Phase III of the landfill and failure to comply with a DEQ approved plan by the due date. WCL implemented corrective measures to recirculate leachate into Phase IV of the landfill and submitted a special waste delineation for disposal of asbestos to meet plan requirements.
- **DEQ Solid Waste program issued a March 13, 2014 Warning Letter with Opportunity to Correct** for not following the Magnesium Chloride Monitoring Plan (MCMP) and not notifying DEQ of the exceedances of concentration limits within 24 hours of the receipt of the data. DEQ provided corrective actions for WCL to follow, including following the MCMP, cover letters on Waste Connections, Inc. (WCI) letterhead stating WCI has reviewed and approved the submitted reports and confirming that the Phase IV Cell 3 sump was checked for liquids in the October and November sampling events and found to be dry.
- **DEQ Air Quality program issued a January 18, 2023 Civil Penalty Assessment and Order** for violation of the Plant Site Emission Limits of approximately \$95,000. This penalty has been appealed and the enforcement action is ongoing.

During the same time period, the following non-formal compliance-related issues also occurred, and have been or are being addressed/resolved as described:

- **Odor Complaints.** Infrequent odor complaints have been received by DEQ. A gas collection and control system installed at the WCL in June 2022 is believed to have reduced odor issues. It is possible that odor complaints inaccurately attribute odors to the landfill, which are from other sources such as agricultural operations near the landfill, Dirt Hugger composting food waste, Amerties making railroad ties, Cherry Growers wastewater ponds.
- **Birds.** WCL is next to a cherry orchard which can be a food source for birds causing economic impact to the orchard. WCL uses a green laser to sweep the landfill side slopes near the orchard and propane cannons to harass birds. WCL also contracts with Animal Plant Health Inspection Services (APHIS) of the USDA to assist the landfill in managing birds. During landfill operations with the propane cannons in use, bird levels are generally low. DEQ has visited the landfill from offsite after hours and weekends in 2022 and 2023 to

view the levels of birds when machinery and the propane cannons are not in use. After hours there are typically one to two dozen ravens on the top deck of the landfill and infrequent seagulls. DEQ believes the bird harassment methods in use are effectively keeping birds to acceptable levels.

PERMIT RENEWAL:

The conditions in the proposed draft renewal permit were adopted from the existing December 2014 permit but may have been relocated within the body of the renewal permit or slightly reworded to be more aligned with the organizational format and language used in DEQ's current solid waste permit template. Some permit conditions were updated or added to be consistent with DEQ's current MSW Landfill template and provide greater specificity about what is authorized and what is prohibited at the site.

Permit changes are discussed in the sections below. There are no permit addendums to carry forward from the August 2015 permit as the addendums were for address updates that have been included in the draft permit renewal.

Section 1.0 PERMIT ISSUANCE is now Section 1 Administration, descriptive language dropped.

Sections 1.1 to 1.6 dropped or renumbered as this information is on the face page of the permit or located elsewhere in the permit.

Section 1.3 Permit term renumbered to 1.6.

Sections 1.7 Definitions and 1.8 Legal control of property renumbered to 1.1 and 1.2.

Section 1.9 Submittal & notification address changed to 1.3 Submittals. Sentence added on submitting as directed by DEQ, language on two sided copies dropped.

Section 2.0 DISCLAIMERS dropped.

Section 2.1 Property rights and 2.2 DEQ liability renumbered to Section 1.4 and 1.5.

Section 3.0 AUTHORITY dropped.

Section 3.1 Permit duration relabeled to 1.6 Permit term; language added to provide additional information.

New Section 1.7 Permit renewal added explaining when a renewal permit application is required.

New Section 1.8 Permittee initiated termination of permit added explaining when a permittee can request permit termination.

Section 3.1 Permit duration dropped, addressed in Section 1.6 Permit term.

Section 3.2 Documents superseded renumbered to 1.9.

Section 3.3 Permittee responsibility and liability relabeled to 1.10 Binding nature; some content deleted shortening section.

Section 3.4 Other compliance renumbered to 1.11, section shortened, and references dropped.

Section 3.5 DEQ access to disposal site relabeled to 1.12 Access to facility, format changed to bullet list for some content.

Section 3.6 Penalties renumbered to 1.13, minor edits to text, OAR references added.

Section 4.0 PERMIT MODIFICATION is now Section 2, descriptive language dropped.

Section 4.1 Five year review dropped.

Section 4.2 Permit modification relabeled to 2.1 Modification, slight edit to language, references added.

Section 4.3 Modification and revocation by DEQ slight edit to language, references added.

Section 4.4 Modification by permittee renumbered to Section 2.3, additional language added on when a permit modification must be requested.

Section 4.5 Public Participation renumbered to 2.6, language modified, reference added.

Section 4.6 Change in ownership or address relabeled to Section 2.5 Transfer, sale or exchange of permit or facility – slight edit to language.

Section 5.0 AUTHORIZATIONS renumbered to Section 3; descriptive language dropped.

Section 5.1 Authorization of activities renumbered to 3.1.

Section 5.2 Authorization of landfill area renumbered to 3.2, reference to Section 10.1 Site development plan changed to 8.1 Site development plan.

Section 5.3 Wastes authorized for receipt renumbered to 3.3, information added on the special waste approved for receipt in the Special Waste Management Plan not already listed in wastes authorized for receipt.

Section 5.4 Authorization of other wastes renumbered to 3.4, language added prohibiting receipt of wastes until required conditions are met.

Section 5.5 Recirculation of leachate & condensate renumbered to 3.5, bullet added on monitoring requirement.

Section 5.6 Salvaging and recycling relabeled to 3.6 Salvaging of materials, minor edits to language, reference added.

Section 6.0 PROHIBITIONS renumbered to Section 4; descriptive language deleted.

Section 6.1 Prohibition on waste acceptance relabeled to 4.1 Prohibited waste, liquids and PCB added to the list.

Section 6.2 Prohibition on waste disposal relabeled to 4.2 Waste banned from disposal. Liquid waste moved from this section to Prohibited waste, electronic devices listed under several bullets instead of “covered electronic devices”, infectious waste and descriptive language deleted.

Section 6.3 Open burning renumbered to 4.3, reference added.

Section 7.0 OPERATIONS PLAN is now Section 5, descriptive language deleted.

Section 7.1 Operations plan submittal relabeled to 5.1 Operations plan. The September 2021 Operations Plan is referenced, no update is required as the Operations Plan is recent. Some modification to language.

New Section 5.2 Plan compliance added with language requiring the plan is followed and is incorporated into the permit by reference.

Section 7.2 Operation plan content relabeled to 5.3 Plan content. Minor edits to section language. Edits to plan content table:

- Disposal operations content bullet list reordered; bullet added on disposing of cleanup materials contaminated with hazardous waste; bullet on special waste expanded to include managing.
- Special Waste Management Plan bullet added on waste screening.
- Ancillary operations bullet added on waste tires.
- Operating record bullet added on complaint log.

Section 7.3 Operations and maintenance manuals renumbered to 5.4. Edits to language, e.g. must instead of should, content is substantially the same.

Section 7.4 Plan and Manual updates relabeled to 5.5 Plan and manual maintenance.

Section 7.5 Plan compliance relabeled to 5.6 Plan and manual compliance, language added to include the Operations and Maintenance Manual and amendments.

Section 8.0 RECORD KEEPING AND REPORTING - OPERATIONS relabeled to Section 6 Recordkeeping and reporting, descriptive language deleted.

New Section 6.1 Records detailing the requirement to keep records five years from date placed in operating record.

Section 8.1 Non-compliance reporting renumbered to 6.2, new contact email and for non-compliance reporting.

Sections 8.2 Permit Display renumbered to 6.3.

Section 8.3 Access to records renumbered to 6.4, minor edits to language.

Section 8.4 Procedure relabeled to 6.5 Procedures; approved Special Wastes added to step 3; "If applicable" deleted from step 4; submit information as directed by the form added to step 5; "County" added to step 6.

Section 8.5 Submittal address deleted, submittal address for this reporting requirement is on the DEQ form.

Section 8.5 Complaint log renumbered to 7.32, additional language specifying timelines to contact complainant and for reporting odor, litter or dust complaints to DEQ.

Section 9.0 SPECIFIC OPERATING CONDITIONS relabeled to 7 Site Operations.

Section 9.1 In this section replaced with 7.1 General site operations, requiring permittee to maintain waste collection and disposal to prevent discharge, health hazards and nuisances. List of topics deleted.

Sections 9.2 Access control, 9.3 Landfill signs, 9.4 Access roads renumbered to 7.2, 7.3, and 7.4; 7.3 heading changed to Signs, deleting Landfill.

Section 9.5 Discovery of prohibited waste renumbered to 7.5. Edits to language requiring notification to DEQ and deleting timeframe to initiate procedures for removal.

Section 9.6 Agricultural waste from agricultural quarantine area renumbered to 7.6.

Section 9.7 Spills notification relabeled to 7.7 Oil and hazardous material spill response and reporting; language added on immediate cleanup of spills.

Section 9.8 Unloading area renumbered to 7.8

Section 9.9 Asbestos waste management renumbered to 7.9; language added on screening requirements asbestos waste is no longer distinguished as friable and non-friable.

Section 9.10 Waste tire management renumbered to 7.10.

New Section 7.11 Infectious waste sharps allowing acceptance of sharps consistent with the Operations Plan.

New Section 7.10 Containers adding a condition to clean containers on site.

Sections 9.11 Litter control, 9.12 Vector control, and 9.13 Daily cover renumbered to 7.15, 7.16, and 7.17 respectively.

Section 9.14 ADC usage relabeled to 7.18 Alternate Daily Cover, minor edits to language.

Sections 9.15 Leachate management and 9.16 Maximum leachate depth combined to 7.19 Leachate management systems; language added to require minimization of leachate production.

Section 9.17 Interim cover renumbered to 7.20.

Sections 9.18 Stormwater management and 9.19 Surface water structures combined to 7.21 Drainage, minor edits to language.

Section 9.20 Air emissions renumbered to 7.22, minor edits to language.

Section 9.21 Landfill gas management renumbered to 7.23.

Section 9.22 Stability Monitoring renumbered to 7.25.

Section 9.23 Fire protection and reporting renumbered to 7.24, contact information updated.

Section 9.24 Water supply renumbered to 7.26.

New Section 7.27 Landfill gas control system operation and maintenance adding requirement that the gas system is operated and maintained in a manner to avoid issues.

New Section 7.28 Cover system adding addition language on cover requirements.

New Section 7.29 Vegetation requiring maintenance of healthy vegetation cover.

New Section 7.30 Surface contour maintenance requiring contours to prevent ponding, erosion and maintained where needed.

New Section 7.31 Future use requiring DEQ approval for certain development within 200 feet of waste.

Section 10.0 SITE DEVELOPMENT AND DESIGN is now Section 8.

Section 10.1 In this section deleted.

Section 10.2 Site Development Plan renumbered to 8.1, language changed to reflect most recent Site Development Plan.

NOTE references to DEQ's 1996 Solid Waste Landfill Guidance have dropped the year throughout the draft permit as this guidance will be updated soon.

Section 10.3 Baseline design criteria renumbered to 8.2.

Section 10.4 Design plans renumbered to 8.3.

Section 10.5 Construction documents renumbered to 8.4.

Section 10.6 Construction requirements renumbered to 8.5, some text edited to bullet list format.

Section 10.7 Construction inspection renumbered to 8.6.

Section 10.8 Construction Certification Report submittal renumbered to 8.7.

Section 10.9 Construction Certification Report content renumbered to 8.8.

Section 10.10 Approval to use a new disposal unit renumbered to 8.9; information added on approval to use MSW for stabilization berms, prior to approval for placing waste in a cell.

Section 11.0 RECYCLING REQUIREMENTS renumbered to Section 9; descriptive language deleted.

Section 11.1 Materials renumbered to 9.1.

Section 11.2 Receiving location relabeled to 9.2 Recycling depot location.

Section 11.3 Material use relabeled to 9.3 Recyclable material use, language added on used oil and wood waste use for energy and prohibition on disposal of source separated recycled material.

Section 11.4 Recycling information renumbered to 9.4, minor edits to requirement for publicly available.

Section 11.5 Sign relabeled to 9.5 Recycling information signs.

Section 11.6 Storage relabeled to 9.6.

Section 12.0 CLOSURE CONSTRUCTION AND MAINTENANCE is now Section 10.

Section 12.1 In this section deleted.

Section 12.2 Worst-case closure plan development renumbered to 10.1.

Section 12.3 Notification of plan updates relabeled to 10.2 Notification.

Section 12.4 Closure permit renumbered to 10.3.

Section 12.5 Closure plan approval relabeled to 10.4 Closure plan requirements and approval.

Section 12.6 Closure schedule renumbered to 10.5.

Section 12.7 Final cover relabeled 10.8 Final cover maintenance. Language and specifications edited to reflect requirements in rule, final cover design and DEQ approval will occur outside this permit issuance.

Section 12.8 Vegetation renumbered to 10.7.

Section 12.9 Final cover maintenance renumbered to 10.8.

Section 12.10 Deed record renumbered to 10.9.

Section 13.0 FINANCIAL ASSURANCE is now Section 11, descriptive language deleted.

Section 13.1 Financial assurance required renumbered to 11.1.

New Section 11.2 Financial assurance plan has been added and refers to financial assurance update requirements.

Section 13.2 Recertification of financial assurance relabeled to 11.3 Annual recertification of financial assurance.

Section 13.3 Use of financial assurance renumbered to 11.4.

Section 13.4 Long-term financial responsibility relabeled to 11.5 Continuous nature.

Section 14.0 ENVIRONMENTAL MONITORING PLAN relabeled to Section 12; descriptive language deleted.

Section 14.1 EMP submittal relabeled to 12.1 Environmental monitoring plan. This section now requires an updated environmental monitoring plan or certification the last approved EMP is current within approximately 180 days of permit issuance.

Section 14.2 EMP contents relabeled to 12.2 Environmental monitoring plan contents; language added on the updated plan contents.

Section 14.3 EMP revisions and updates relabeled to 12.3 Environmental monitoring plan revisions and updates. Example text deleted.

Section 14.4 Long-term groundwater monitoring relabeled to 14.4 Long-term monitoring plan, language has been revised a little.

New Section 12.5 Additional monitoring points requiring updates to the environmental monitoring plan for new or replacement monitoring points or devices.

Section 15.0 ENVIRONMENTAL SAMPLING REQUIREMENTS renumbered to Section 13; descriptive language deleted.

Section 15.1 Notification of sampling events renumbered to 13.1.

Section 15.2 Split sampling events renumbered to 13.2. Section has been revised for the next split sampling event in Fall 2028 and Spring of 2032.

Section 15.3 Monitoring schedule renumbered to 13.3.

Section 15.4 Interim monitoring renumbered to 13.4; now refers to the Facility's January 2016 Environmental Monitoring Plan, slight edits to text.

Section 15.5 Monitoring after EMP approval relabeled to 13.5 Monitoring after environmental monitoring plan approval; some text reformatted to bullet list.

Section 15.6 Changes in sampling or split sampling renumbered to 13.6.

Section 16.0 ESTABLISHING PERMIT-SPECIFIC CONCENTRATION LIMITS ... relabeled to Section 14; descriptive language and abbreviations deleted.

Section 16.1 Gathering data renumbered to 14.1.

Section 16.2 Statistical analysis renumbered to 14.2, reference expanded.

Section 16.3 Proposing PSCLs, ALs, and/or SSLs relabeled to 14.3 Proposing permit-specific concentration limits, action limits, and/or site-specific limits.

Section 16.4 Changing PSCLs, ALs, and/or SSLs relabeled to 14.4 Changing permit-specific concentration limits, action limits, and/or site-specific limits.

Section 16.5 Establishing and changing CLVs relabeled to 14.5 Establishing and changing concentration limit variances.

Section 17.0 ENVIRONMENTAL MONITORING STANDARDS renumbered to Section 17; descriptive language and bullet list deleted.

Sections 17.1 Applicable regulatory standard, 17.2 Compliance points, 17.3 Review of results, 17.4 Resampling results renumbered to Sections 15.1, 15.2, 15.3 and 15.4 Landfill gas probes added to Section 15.2.

Section 17.5 Secondary leachate collection system renumbered to 15.5, language added on design requirements to allow for discrete sampling.

Sections 17.6 Methane limits and 17.7 Methane exceedance renumbered to Sections 15.6 and 15.7.

Section 18.0 RECORD KEEPING AND REPORTING - ENVIRONMENTAL MONITORING is now Section 18, descriptive language and bullet list deleted.

Sections 18.1 Annual Environmental Monitoring Report (AEMR), 18.2 Statement of Compliance, 18.3 Annual Environmental Monitoring Report (AEMR) contents, renumbered to 16.1, 16.2, and 16.3; acronyms deleted from headings.

Section 18.4 Semi-annual Groundwater Monitoring Report deleted; only annual environmental monitoring reports are required.

Section 18.5 Split sampling submittal renumbered to 16.4; reference to Section 13.2 added.

Section 18.6 DEQ Lab address deleted.

Section 18.7 DEQ response to split samples renumbered to 16.5.

Section 19.0 ENVIRONMENTAL MONITORING NETWORK renumbered to Section 17; descriptive language deleted.

Section 19.1 Monitoring stations, devices, and equipment renumbered to 17.1, language added on all reasonable weather access.

Section 19.2 Reporting equipment damage renumbered to 17.2.

Section 19.3 Monitoring devices construction renumbered to 17.3, 1992 DEQ reference deleted.

Sections 19.4 Reporting monitoring device construction and repairs relabeled to 17.4 Reporting well construction and repairs.

Section 19.5 Monitoring device decommissioning or replacement renumbered to 17.5.

Section 20.0 SUMMARY OF DUE DATES is now Sections 18 Summary of Due Dates and 18.1 Summary. The due dates have been added (e.g., surface water structures) or adjusted to be consistent with permit requirements. The Operations Plan is current enough that DEQ will not require an update or certification.

Section 21.0 ATTACHMENT: PARAMETER GROUPS renumbered to 19. Content in this section has been divided into subsections with an overview (19.1) and then by parameters group (19.2 – 19.9) in the new draft permit. Greater detail on the AWWA Standards and Methods reference has been added.

New Section 20 Attachment 2: Permit-Specific Concentration Limits, Action Limits, and Site-Specific Limits added reference to the environmental monitoring plan for these limits as applicable.

Addendum No. 1 changed the address for DEQ's Materials Management Program in headquarters. The headquarters address (700 NE Multnomah) is now provided on the reporting form used to comply with Section 6.5 of the draft permit and is no longer included in the permit.

Addendum No. 2 changed the address for DEQ's Laboratory, the current address is now listed in Section 13.2 Split sampling events.

Addendum No. 3 eliminated the requirements for a semi-annual groundwater monitoring report, this requirement has been removed from the permit.

RECOMMENDATIONS:

DEQ should release the draft permit renewal to the applicant and the public for review and comment.