

Signature Page

I, [Redacted]
(Site Operator (Permittee/Registrant)'s Authorized Signatory)

DIRECTOR OF PUBLIC WORKS
(Title)

certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: [Redacted]

Date: 4 Aug 2022

~~TO BE COMPLETED BY THE OPERATOR IF THE APPLICATION IS SIGNED BY AN AUTHORIZED REPRESENTATIVE FOR THE OPERATOR~~

~~I, _____, hereby designate _____
(Print or Type Operator Name) (Print or Type Representative Name)~~

~~as my representative and hereby authorize said representative to sign any application, submit additional information as may be requested by the Commission; and/or appear for me at any hearing or before the Texas Commission on Environmental Quality in conjunction with this request for a Texas Water Code or Texas Solid Waste Disposal Act permit. I further understand that I am responsible for the contents of this application, for oral statements given by my authorized representative in support of the application, and for compliance with the terms and conditions of any permit which might be issued based upon this application.~~

~~Printed or Typed Name of Operator or Principal Executive Officer~~

~~Signature~~

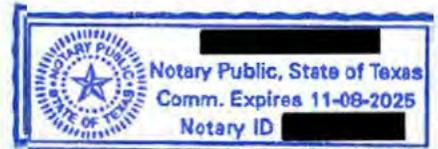
SUBSCRIBED AND SWORN to before me by the said ALFREDO J. RIERA

On this 4th day of AUGUST, 2022

My commission expires on the 8th day of NOVEMBER, 2025

Notary Public in and for
EL PASO County, Texas

(Note: Application Must Bear Signature & Seal of Notary Public)



Permit/Registration Modification with Public Notice

(See Instructions for P.E. seal requirements.)

Required Attachments	Attachment No.
Land Ownership Map	1
Land Ownership List	1
Marked (Redline/Strikeout) Pages	2
Unmarked Revised Pages	1

Additional Attachments as Applicable- Select all those apply and add as necessary

- Signatory Authority
- Fee Payment Receipt
- Confidential Documents

Matrix of Changes
2022 Notice Permit Modification Application
Fort Bliss Municipal Solid Waste Landfill – Permit 1422

Changes from the original March 2008 Permit Application, updated by the Approved 2012 and 2015 Modifications, are noted below.

Referenced Section	Section Description	Description of Change	Action to be Taken
NA	All documents submitted with this application	Fort Bliss is removing branding from the documents.	For each document submitted as part of this application, logos have been removed. Additionally references to the United States Army Corps of Engineers have been removed from the title pages and from footers.
NA	Permit Modification Application Text	Redline changes as noted below	Replace text and retain existing tables, figures and appendices unless otherwise noted
NA	TCEQ Core Data Form	This data has been updated to reflect this current permit modification application	Replace in its entirety – New Core Data Form has been provided
NA	Executive Summary	The executive summary has been updated to reflect the current permit modification application	Replace in its entirety – Executive summary has been revised for this permit modification application
Application Part I			
1.1	Part I Permit Application text and TCEQ Form 20650	Minor edits to Section 1.1 introduction text. The TCEQ Form 20650 (Part I of the application) has been revised to reflect the current permit modification application. Attachment 1 to Form 20650 (Landownership Map and Land Ownership List) has also been updated.	Replace in its entirety – New TCEQ Form 20650 (Part 1 Form) has been provided.
Application Part II			
2.1	Existing Conditions Summary	Minor text revisions	Redline changes noted in text
2.2.1.1	Description of general sources and generation areas	Minor text revisions to reflect that the landfill is no longer active.	Redline changes noted in text
2.2.1.3	Landfill: Maximum Annual Acceptance Rate	Minor text revisions	Redline changes noted in text

Matrix of Changes
2022 Notice Permit Modification Application
Fort Bliss Municipal Solid Waste Landfill – Permit 1422

Changes from the original March 2008 Permit Application, updated by the Approved 2012 and 2015 Modifications, are noted below.

Referenced Section	Section Description	Description of Change	Action to be Taken
2.3.4	Schools, Licensed Day-cares, Churches, Residential/ Commercial/ Recreational areas	Minor text revision	Redline changes noted in text
2.3.9	Property Boundary	Text revisions to address 50-foot buffer requirement between the northern landfill boundary and the limit of waste.	Redline changes noted in text
2.4.1	Outline of Units	Minor text revisions	Redline changes noted in text
2.4.5	Proposed Construction Sequence	Minor text revisions	Redline changes noted in text
2.4.1 – 2.4.4 following 2.4.5	The section headers that follow Section 2.4.5 incorrectly start renumbering as 2.4.1, instead of continuing with 2.4.6.	Renumber Sections 2.4.1 – 2.4.4 that follow Section 2.4.5 as 2.4.6 through 2.4.9.	Redline changes noted in text
2.4.9.1 (formerly 2.4.4.1)	Sectors	Minor text revisions	Redline changes noted in text
2.4.9.2	Sequence of Filling Operations	Updated to reflect that the landfill is no longer active and to include filling operations during closure activities.	Redline changes noted in text
2.4.9.3	Dimensions of Cells or Trenches	Text revisions made to reference the 2021 Limit of Waste Investigation (LOWI).	Redline changes noted in text
2.4.9.4	Maximum Waste Elevations and Final Cover	Edit referenced drawing numbers	Redline changes noted in text
2.8.4	Proximity of Residences and Other Uses	Updated to reflect current conditions	Redline changes noted in text
2.9.2	Vehicular Traffic Volume	Minor text revisions to reflect that the landfill is no longer active	Redline changes noted in text
2.9.3	Expected Vehicular Traffic Volume	Minor text revisions to reflect that the landfill is no longer active	Redline changes noted in text
2.14.2	Compliance Demonstrations	Minor text revisions to reflect the current permit modification application	Redline changes noted in text
2.16	Council of Governments and Local Government Review Request	Updated with current contact information	Redline changes noted in text
Table 2-1	Public Areas within One Mile	Table has been updated	Replace in its entirety

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2022 Notice Permit Modification Application
Fort Bliss Municipal Solid Waste Landfill – Permit 1422

Changes from the original March 2008 Permit Application, updated by the Approved 2012 and 2015 Modifications, are noted below.

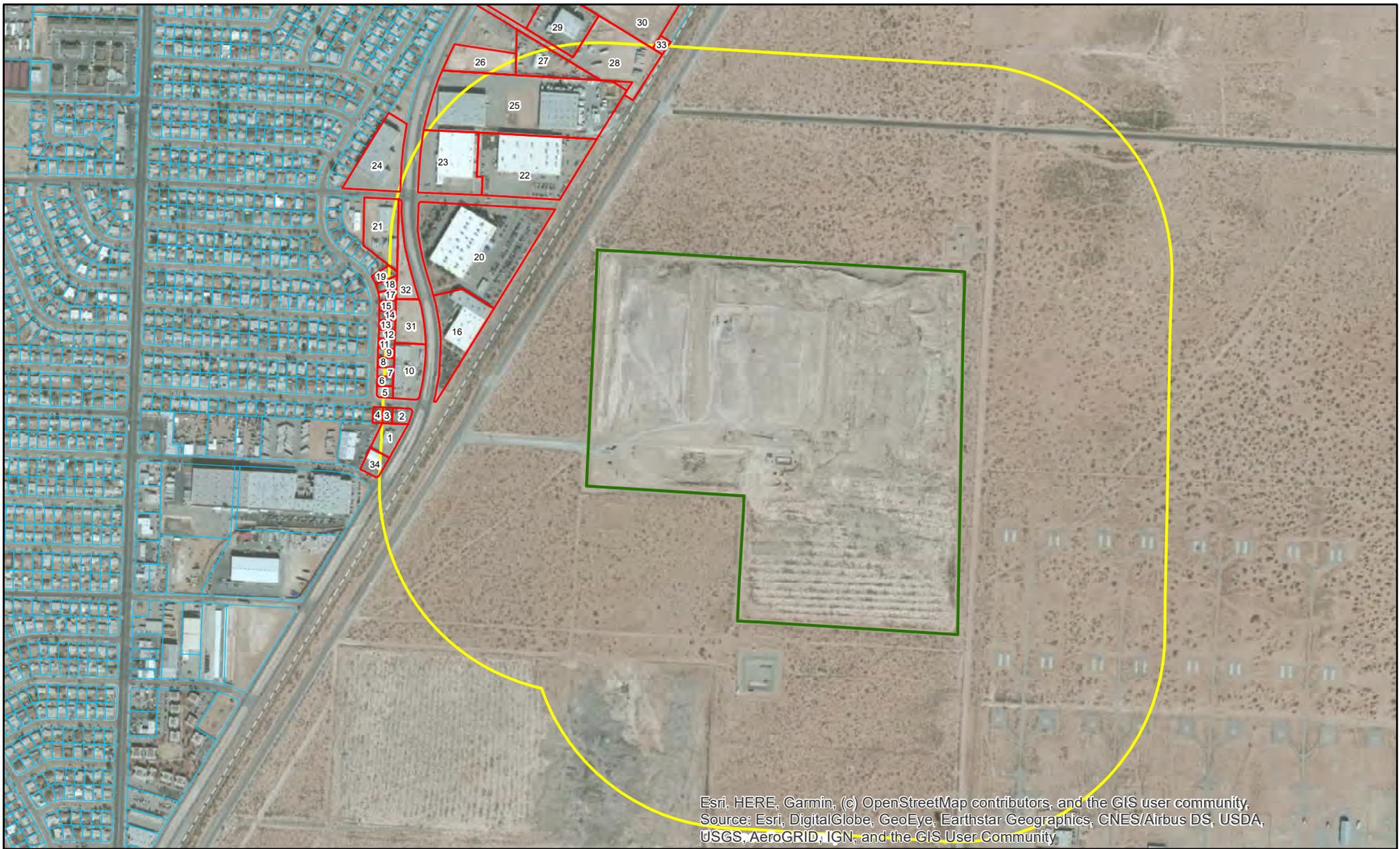
Referenced Section	Section Description	Description of Change	Action to be Taken
Application Part III	See below	See below	Replacement pages are provided
3.4	Waste Management Unit Design	Minor text revisions	Redline changes noted in text
3.4.3	Surface Impoundments	Updated to reflect that the surface impoundments are no longer present	Redline changes noted in text
3.4.4.1	Provisions for All Weather Operations	Minor text revisions to reflect that the landfill is no longer active	Redline changes noted in text
3.4.4.2	Landfill Method Proposed	Minor text revisions to reflect that the landfill is no longer active	Redline changes noted in text
3.4.4.4	Calculations of Estimated Solid Waste Deposition and Operating Life	Updated calculations based on recent data	Redline changes noted in text
3.4.4.5	Landfill Cross-Sections	Edit referenced drawing number	Redline changes noted in text
3.4.4.6	Construction and Design Details	Minor text revisions to reflect that the landfill is no longer active. Edit referenced drawing number	Redline changes noted in text
3.4.8	Compost Units	Minor text revision to reflect that the landfill is no longer active	Redline change noted in text
3.8	Closure Plan	Minor text revisions to reflect this current permit modification application	Redline change noted in text
3.9	Post-Closure Plan	Minor text revisions to reflect this current permit modification application	Redline change noted in text
Application Part IV	See below	See below	Replacement page is provided
4.3	Procedures for Recirculating Leachate or Gas Condensate into a Landfill Unit	Text revisions to reflect that the landfill is no longer active and current procedures for handling leachate.	Redline change noted in text

Matrix of Changes
2022 Notice Permit Modification Application
Fort Bliss Municipal Solid Waste Landfill – Permit 1422

Changes from the original March 2008 Permit Application, updated by the Approved 2012 and 2015 Modifications, are noted below.

Referenced Section	Section Description	Description of Change	Action to be Taken
Appendices			
Appendix B	Landfill Modification and Closure Design Drawings	Replacement of previous permit application drawings. Revisions include changes to the final contours and slopes to allow, to the extent practical, relocation of waste identified outside of the permitted cell boundaries in the 2021 Limits of Waste Investigation and to maintain a three-foot cover thickness.	Replace Appendix in its entirety
Appendix L	Facility Surface Water Drainage Report	Replacement of previous appendix in its entirety as analysis was revised based on revised grading plan	Replace Appendix in its entirety
Appendix O	Closure Plan	Edits to incorporate revisions to the ET cover system design	Redline changes noted in text

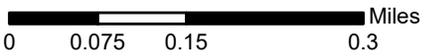
Part I Attachment
¼ Mile Landownership Information
(Figure 1)



Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community,
 Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA,
 USGS, AeroGRID, IGN, and the GIS User Community

- LEGEND**
- Quarter Mile Land Parcels
 - Mile Land Parcels
 - Landfill Boundary
 - Quarter Mile Radius Boundary

REFERENCE:
 El Paso Central Appraisal District
 Files for 2021 as of October 4; 91.7 MB
<https://epcad.org/OpenGovernment#shapefiles>



**U.S. ARMY
 CORPS OF ENGINEERS**

**FORT BLISS MUNICIPAL SOLID WASTE
 LANDFILL - PROPERTIES WITHIN
 1/4 MILE OF LANDFILL BOUNDARY**

	FIGURE 1
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Landowners Cross-Referenced to Landowners Map (Figure 1)

Map ID	Type	Parcel Size (acres)	Owner Name	Address	City	State
1	Commercial	0.761	[REDACTED]	[REDACTED]	EL PASO	TX
2	Commercial	0.2385	[REDACTED]	[REDACTED]	EL PASO	TX
3	Residential	0.14	[REDACTED]	[REDACTED]	EL PASO	TX
4	Residential	0.1423	[REDACTED]	[REDACTED]	EL PASO	TX
5	Residential	0.1808	[REDACTED]	[REDACTED]	EL PASO	TX
6	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
7	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
8	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
9	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
10	Commercial	1.4058	[REDACTED]	[REDACTED]	EL PASO	TX
11	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
12	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
13	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
14	Residential	0.1446	[REDACTED]	[REDACTED]	EL PASO	TX
15	Residential	0.1505	[REDACTED]	[REDACTED]	EL PASO	TX
16	Commercial	2.6774	[REDACTED]	[REDACTED]	EL PASO	TX
17	Residential	0.173	[REDACTED]	[REDACTED]	EL PASO	TX
18	Residential	0.2163	[REDACTED]	[REDACTED]	EL PASO	TX
19	Residential	0.2295	[REDACTED]	[REDACTED]	EL PASO	TX
20	Commercial	8.8838	[REDACTED]	[REDACTED]	EL PASO	TX
21	Commercial	2.07	[REDACTED]	[REDACTED]	EL PASO	TX
22	Commercial	5.8994	[REDACTED]	[REDACTED]	EL PASO	TX
23	Commercial	3.8266	[REDACTED]	[REDACTED]	ALBUQUERQUE	NM
24	Commercial	2.633	[REDACTED]	[REDACTED]	MIDLAND CITY	AL
25	Commercial	9.4907	[REDACTED]	[REDACTED]	EL PASO	TX
26	Commercial	1.6378	[REDACTED]	[REDACTED]	EL PASO	TX
27	Commercial	2	[REDACTED]	[REDACTED]	EL PASO	TX
28	Commercial	3.6089	C [REDACTED]	[REDACTED]	EL PASO	TX
29	Commercial	2.7439	[REDACTED]	[REDACTED]	EL PASO	TX
30	Commercial	60	[REDACTED]	[REDACTED]	EL PASO	TX
31	Commercial	1.0626	[REDACTED]	[REDACTED]	EL PASO	TX
32	Commercial	0.6	[REDACTED]	[REDACTED]	EL PASO	TX
33	Commercial	0.115	[REDACTED]	[REDACTED]	EL PASO	TX
34	Commercial	0.453	[REDACTED]	[REDACTED]	HOUSTON	TX

2. Part II of the Application

2.1. Existing Conditions Summary

§330.61(a)

The Fort Bliss military installation is located within the extraterritorial jurisdiction of the City of El Paso and extends into unincorporated portions of El Paso County, Texas, and the counties of Dona Ana and Otero in New Mexico. Currently the primary missions of the installation are: home of 1st Armored Division, senior noncommissioned officers training, administrative and logistical support of tenant activities, and provision of training facilities for reserve components.

The MSWLF is located northwest of Biggs Army Airfield and 300 feet east of the Southern Pacific Railroad tracks in El Paso County, Texas. The MSWLF is about 1,200 feet east of the nearest occupied structure. Occupied structures include commercial and residential areas located on the west side of the MSWLF. An all-weather road is accessible to the MSWLF year-round. A 10-foot-high chain link fence with barbed wire outriggers surrounds the entire perimeter of the MSWLF. A 6-foot 4-inch by 12-foot 4-inch by 10-foot-high enclosed guard shack/scale house is located on the MSWLF near the entrance. No buried utilities are within the perimeter of the MSWLF.

The Fort Bliss MSWLF includes inactive Subtitle D Type I and Type IV landfill cells that were in use until 2015 to serve the United States Army Fort Bliss (USAFB). The landfill has been managed and operated by private contractors since January 1974. The landfill area comprises five distinct areas:

- 1970's-era inactive cells that cover 80-acres and are unlined and without leachate collection. The permit does not allow further placement of MSW in these cells. According to the March 1995 Final Closure Plan and Cost Estimate, these 80 acres are considered interim closed.
- A 3-acre Type 1 cell with final cover in place (non-Subtitle D) that complies with the 1995 closure plan and TCEQ closure requirements. TCEQ approval was received February 24, 1999.
- A 10.5-acre Type 1 inactive cell meeting Subtitle D requirements (Subtitle D cell). This cell is lined and has a leachate collection system.
- A 5-acre inactive Type IV construction and demolition (C&D) debris cell. This cell is unlined and without leachate collection.
- Approximately 7 acres designated for landfill roads, access areas, guard shack/scale house, etc.

This modification is for consideration of revisions to the approved optimized ET alternative final landfill cover design to alter the final grades to allow, to the extent practical, relocation of waste outside of the permitted cell boundaries identified in the 2021 Limits of Waste Investigation (LOWI); to revise the landfill closure contours; and to maintain a three-foot cover thickness. The corresponding modifications are provided in Appendix B (Modification and Closure Design Drawings), Appendix L (Facility Surface Water Drainage Report), and Appendix O (Closure Plan). Existing conditions are not significantly affected by these changes, as demonstrated in the remaining sections of this application. Fort Bliss does not have any site-specific conditions that require special design consideration or possible mitigation of conditions identified in 30 TAC §330.61(h)-(o).

2.2. Waste Acceptance Plan

2.2.1. Sources and Characteristics of Wastes

2.2.1.1. Description of general sources and generation areas

§330.61(b)(1)(A)

The MSWLF served the military operations within the USAFB. Permitted types of solid wastes disposed of at the MSWLF were non-hazardous solid wastes from military operations, bulky items, grass and tree trimmings, refuse from litter cans, construction debris, classified waste (dry), dead animals, Regulated Asbestos Containing Material (RACM), and empty oil cans (1-quart and 5-gallon sizes). The MSWLF did not receive hazardous waste nor did it recover incoming waste.

2.2.1.2. Transfer Stations

§330.61(b)(1)(B)

This section is not applicable; the Fort Bliss MSWLF does not contain a transfer station.

2.2.1.3. Landfill: Maximum Annual Acceptance Rate

§330.61(b)(1)(C)

Based on the approved 1995 final landfill contours, the total permitted waste capacity of the Fort Bliss MSWLF is 5.9 million cubic yards. As of 2008, the current volume of in-place waste was about 5.1 million cubic yards. The 2008 permit modification for the 10-foot height increase in the Subtitle-D cell added an additional 180,000 cubic yards of landfill capacity. The approved optimized ET landfill cover final grading plan did not significantly alter the final grades presented in the 2008 permit modification; rather, the optimized ET landfill cover final grading plan generally conforms to the grades developed during filling operations (based on the 2010 topographic survey) to provide more easily constructible ridges, swales, and slopes. The approved grading was further optimized to reduce the extent of waste relocation and to utilize existing soils covering the waste as part

of the optimized cover system. The grades also optimize the southern and western orientation of the south and west facing landfill slopes to support potential future Photo-Voltaic (PV) development over the closed landfill. The potential future use for the facility is described in Appendix R. The proposed revisions to the grading plan will not significantly alter the final grades presented in the 2015 permit modification for the approved optimized ET landfill cover, and the design parameter for the maximum elevation in the Subtitle D cell is not changed.

2.2.2. Qualification for Registration

§330.61(b)(2)

The Fort Bliss MSWLF is authorized under a permit (MSW Permit No. 1422). The facility is seeking a modification requiring notice to its permit, pursuant to 30 TAC §305.70(k).

2.3. General Location Maps

2.3.1. Prevailing Wind Direction with a Wind Rose

§330.61(c)(1)

The prevailing wind direction at the MSWLF is from the north during the winter months and from the south during the summer months with an overall southeasterly prevailing wind. Dust storms and wind storms are frequent during the months of March and April. Wind speeds can occasionally reach up to 35 miles per hour (mph) during intense weather events. Figure 2-1 provides an annual wind rose map for the northern El Paso area.

El Paso experiences three prevailing wind change regimes with a dominant northerly wind flow in the cooler seasons of October through February (see Figure 2-2), a shift to west-southwest in the spring, March into early June (see Figure 2-3), and another distinct shift to prevailing southeast winds in July through mid-September (see Figure 2-4).

2.3.2. Known Water Wells

§330.61(c)(2)

Two groundwater production wells with the Texas Water Development Board well designation as “located wells” are located about 350 feet north of the MSWLF. The well location maps in the “*Geohydrologic Site Characterization of the Municipal Solid Waste Landfill Facility, U.S. Army Air Defense Artillery Center and Fort Bliss, El Paso County, Texas*” U.S. Geological Survey, Water-Resources Investigations Report 95-4217 (Abeyta, 1996, Appendix D) show the location of the two water wells within 500 feet (ft) of the permitted boundary. The first well, W-3, has been in existence for many years, while W-3A was constructed circa 1995 and is located adjacent to the older well. These wells are used as groundwater production wells and are owned by the U.S. Army. The geohydrologic report also provides the location and description of both groundwater wells.

Well W 3 is 826 feet deep, and well W 3A is 940 feet deep. The regional topographic gradient of the groundwater flow in the area is generally to the south and southwest towards the Rio Grande River. Precise groundwater flow direction at specific locations is difficult to determine due to City of El Paso and U.S. Army production well pumping and the geometric configuration of the groundwater aquifers.

2.3.3. Structures and Inhabitable Buildings

§330.61(c)(3)

A guard shack/scale house located in the southwest corner of the MSWLF at the entrance to the landfill facing west is the only inhabitable structure within 500 feet of the facility. A water tank located just west of the guard shack/scale house is the only other structure within 500 feet of this unit (see Figure 2-5)

2.3.4. Schools, Licensed Day-cares, Churches, Residential/ Commercial/ Recreational areas

§330.61(c)(4)

No hospitals, cemeteries, ponds or lakes exist within one mile of the facility. The General Location Map (Figure 2 6), provides locations of the schools, licensed day care facilities, churches, and residential, commercial, and recreational areas within one mile of the MSWLF. A list of public areas located within the one mile radius is provided in Table 2 1. The list of schools, churches, day care facilities, residential, commercial, and recreational areas are current as of June 2021 as provided determined by a Global Information System (GIS) search of tax parcel records

2.3.5. Roads Within One mile

§330.61(c)(5)

Roads within a one mile radius used for accessing the facility are shown on Figure 2 7. The access road to the landfill entrance is asphalt concrete. The internal access roads to the active fill areas are caliche based roads. Roads used by the Fort Bliss MSWLF for entering or leaving the facility are located on, owned by and operated by the Fort Bliss military installation. The unlabeled roads are known as “tank trails” and are not named.

2.3.6. Latitude and Longitude

§330.61(c)(6)

The coordinates of the Fort Bliss MSWLF are as follows:

Latitude: [REDACTED]”
Longitude: [REDACTED]”
Elevation: 3930 feet above mean sea level (msl)

2.3.7. Area Streams

§330.61(c)(7)

No perennial or ephemeral streams are on or in the vicinity of the Fort Bliss MSWLF.

Surface water flow occurs perennially in the Rio Grande River with occasional additional stream flows into the Rio Grande about two miles from the MSWLF during periods of intense precipitation. Surface outflow is negligible due to absence of surface streams.

2.3.8. Airports

§330.61(c)(8)

Airports located within 6 miles of the MSWLF are:

- Biggs Army Airfield, [REDACTED]
- El Paso International Airport, [REDACTED]

2.3.9. Property Boundary

§330.61(c)(9)

The Fort Bliss MSWLF property boundaries are outlined in red on Figure 2 5. The property boundaries defined in the legal description of the original permit application can be provided upon request.

As further shown in Appendix B, Permit Drawings, the limits of waste in Cell 3 and Cell 4 are within 50 feet of the northern permitted boundary. Rather than relocate waste as part of the final closure construction, the final cover will be extended over these areas. Since Fort Bliss owns the lands surrounding the landfill, the requirement to maintain a 50 foot buffer between the northern boundary and the limit of waste will be met through addition of notes to the Base Master Plan reserving this area for the landfill. Upon approval of the permit application, the perimeter fence will be relocated to include this additional buffer area..

Additionally, the 2021 LOWI identified localized areas of waste which are outside of cell boundaries and within 50 feet of the permit boundary (see Appendix B, Permit Drawings). As part of closure activities, relocation of waste outside of cell boundaries will be performed, to the extent practical. However, if all wastes cannot be removed, these areas may also require to addition the Base Master Plan notes, to reserve them as areas retained for the landfill.

2.3.10. Drainage, Pipeline, Utility Easements

§330.61(c)(10)

No drainage or pipelines are located within the MSWLF (See Figure 2-5). Three green bollards are location in the Northwest corner of the MSWLF (See Figure 2-5) indicating the location of the electric utility easement on the property. Utility easement holders are as follows:

El Paso Electric P.O. Box 982 El Paso, TX 79960	El Paso Water Utilities P.O. Box 511 El Paso, TX 79961-001
Texas Gas Service 7117 Florida Blvd Baton Rouge, LA 70806	Union Pacific Railroad Company 1400 Douglas Street- Stop 1690 Omaha, NE 68179-1690

2.3.11. Facility Access Control Factors

§330.61(c)(11)

General public access is restricted since the landfill is on a military installation. Access to the actual landfill is also restricted through use of fencing, gates, and the guard shack. Only authorized vehicles have access beyond the guard shack or facility entrance. Authorized vehicles consist of:

- Any government-owned commercial or military vehicle
- Any government contractor whose truck is sent to the disposal area with disposal material and who has a valid landfill permit
- Contractor’s vehicle used to collect solid waste from Fort Bliss, not including family housing, is also an authorized vehicle

Government vehicles must have government license plates. Signage provides direction to customers to the entrance to the landfill.

The Site Operating Plan (Appendix A, March 2008) describes the perimeter fencing, vehicle access procedures, and vehicle transport within the MSWLF. The perimeter fencing, guard shack, and vehicle access roads are shown on Figure 2-5.

2.3.12. Archaeological Sites, Historical Sites, Sites with Exceptional Aesthetic Qualities

§330.61(c)(12)

No archaeological sites, historical sites, or sites with exceptional aesthetic qualities are located adjacent to the MSWLF. The request for the Texas Historical Commission review

letter is provided in Appendix E. Please note that the Fort Bliss MSWLF is a fully developed, permitted, operational site.

2.4. Facility Layout Maps

2.4.1. Outline of Units

§330.61(d)(1)

The Fort Bliss MSWLF includes inactive Subtitle D Type I and Type IV landfill cells in which were used to serve the USAFB. The landfill has been managed and operated by private contractors since January 1974. The landfill area is comprised of five distinct areas:

- 1970's-era inactive cells that cover 80-acres and are unlined and without leachate collection. The permit does not allow further placement of MSW in these cells. According to the March 1995 Final Closure Plan and Cost Estimate, these 80 acres are considered closed.
- A 3-acre Type 1 cell with final cover in place (non-Subtitle D) that complies with the 1995 closure plan and TCEQ closure requirements. TCEQ approval was received February 24, 1999.
- A 10.5-acre Type 1 inactive cell meeting Subtitle D requirements (Subtitle D). This cell is lined and has a leachate collection system. This cell was nearing permitted capacity when taken out of use.
- A 5-acre inactive Type IV C&D debris cell. This cell is unlined and without leachate collection.
- Approximately 7 acres designated for landfill roads, access areas, guard shack/scale house, etc.

This modification is for consideration of changes to the approved optimized ET alternative final landfill cover design to alter the final grades and allow the relocation of waste to the extent practical, revise landfill closure contours, and maintain a three-foot cover thickness. The corresponding modifications are provided in Appendix B (Modification and Closure Design Drawings), Appendix L (Facility Surface Water Drainage Report), and Appendix O (Closure Plan).. Existing conditions are not significantly affected by this change, as demonstrated in the remaining sections of this application. Fort Bliss does not have any site-specific conditions that require special design consideration or possible mitigation of conditions identified in 30 TAC §330.61(h)-(o).

Landfill units are marked on Sheet C-1 of Appendix B.

2.4.2. Roadways

§330.61(d)(2)

Interior roadways are shown on Figure 2-5.

2.4.3. Monitoring Wells

§330.61(d)(3)

This section is not applicable. The TCEQ approved Fort Bliss' request for groundwater monitoring suspension on May 22, 1996 (see Appendix F). One existing monitoring well located on the west side of Cell 1 does exist and will be abandoned as part of the final cover construction activities.

2.4.4. Locations of Buildings

§330.61(d)(4)

The only inhabitable structure within 500 feet of the MSWLF is the guard shack/scale house shown on Figure 2-5. No other buildings are located within the MSWLF boundary.

2.4.5. Proposed Construction Sequence

§330.61(d)(5)

The MSWLF is already constructed. The constructed landfill cells are depicted on Sheet C-1 of Appendix B. The final grading plan is shown on Sheets C-2 and C-3 in Appendix B.

2.4.6. Fencing

§330.61(d)(6)

Perimeter fencing depicts the outline of the MSWLF as shown in red on Figure 2-5.

2.4.7. Wind Breaks

§330.61(d)(7)

This section is not applicable; there are no natural wind breaks located at the MSWLF nor plans for screening the facility from public view. The MSWLF is located entirely within the military installation and away from public view.

2.4.8. Entrance Roads

§330.61(d)(8)

All access roads to the MSWLF are located on the Fort Bliss military installation (See Figure 2-7), and are not public access roads. The access road to the landfill entrance is asphalt concrete and useable during wet weather conditions. The operator will maintain

internal roads to promote drainage and limit ponding during wet weather conditions. Fort Bliss is located in an arid climate so that wet weather is not a major concern at the MSWLF.

2.4.9. Landfill Units

2.4.9.1. Sectors

§330.61(d)(9)(A)

The landfill area comprises five distinct areas (Refer to Sheet C-1 in Appendix B):

- 1970's-era inactive cells that cover 80-acres and are unlined and without leachate collection. The permit does not allow further placement of MSW in these cells. According to the March 1995 Final Closure Plan and Cost Estimate, these 80 acres are considered closed.
- A 3-acre Type 1 cell with final cover in place (non-Subtitle D) that complies with the 1995 closure plan and TCEQ closure requirements. TCEQ approval was received February 24, 1999.
- A 10.5-acre Type 1 inactive cell meeting Subtitle D requirements (Subtitle D cell). This cell is lined and has a leachate collection system. This cell was nearing permitted capacity when taken out of use.
- A 5-acre inactive Type IV construction and demolition (C&D) debris cell. This cell is unlined and without leachate collection.
- Approximately 7 acres designated for landfill roads, access areas, guard shack/scale house, etc.

2.4.9.2. Sequence of Filling Operations

§330.61(d)(9)(B)(c)

During the landfill's active life, the solid waste filling operations included the following:

- Placement in a single two-foot layer each day
- Protection with six inches of soil (daily cover)
- Continuation with a single two-foot layer throughout the cell from the edge of the previous day's activities. An additional two-foot layer was started when the first layer was complete.

When solid waste is relocated for closure into the Subtitle D cell, the above procedures will be used or an alternative daily cover (e.g., tarping) will be substituted. Final cover will be applied during closure, and the landfill elevation will not exceed the permitted elevation.

2.4.9.3. Dimensions of Cells or Trenches

§330.61(d)(9)(D)

The only requested modifications to the physical conditions of the facility are minor changes to the final grading plan of the landfill to allow, to the extent practical, relocation of waste identified in the 2021 LOWI outside of the permitted cell boundaries . . Refer to Sheet C-1 in Appendix B for the existing limits of waste determined as part of the LOWI.

2.4.9.4. Maximum Waste Elevations and Final Cover

§330.61(d)(9)(E)

The proposed final contours for maximum waste elevations and cover are shown on Sheets C-2 and C-3 of Appendix B. The maximum waste elevations are shown on Sheet C-8 of Appendix B.

2.5. General Topographic Maps

§330.61(e)

General topographic maps of the MSWLF are provided in Appendix B. Figure 2-8 provides the United States Geological Survey (USGS) 7 ½-minute quadrangle sheet or equivalent, at a scale of one inch equal to 2000 feet.

2.6. Aerial Photograph

2.6.1. General

§330.61(f)(1)

Aerial photographs that are approximately 9 inches by 9 inches with a scale within a range of one inch equals 1,667 feet to one inch equals 3,334 feet and showing proximity to at least a one-mile radius of the MSWLF site boundaries are provided as Figures 2-9 through 2-14.

2.6.2. Growth Trends

§330.61(f)(2)

A series of aerial photographs ranging from 1967 to 2003 are used to show growth trends of the one mile area around the MSWLF as shown on Figures 2-9 to 2-14. The photographs show rapid commercial and residential building growth in areas outside the Fort Bliss military installation including the area directly west of the MSWLF.

At this time, the land nearest the MSWLF beyond the Fort Bliss boundary is fully developed. The land adjacent to the MSWLF is owned by Fort Bliss with no current plans for development.

2.6.3. Historical Aerial Photographs

■ Historical Aerial Photograph for Northwest El Paso dated 1967

The MSWLF does not exist in the 1967 photograph, Figure 2-9. The site of the MSWLF consists of undeveloped land owned by Fort Bliss. Limited commercial and residential development appears in the areas to the west and north of the present day landfill boundaries.

■ Historical Aerial Photograph for Northwest El Paso dated 1974

The boundaries of the MSWLF are visible as outlined in the 1974 photograph, Figure 2-10. Commercial and residential development increases are evident in the area west of the landfill.

■ Historical Aerial Photograph for Northwest El Paso dated 1988

The boundaries of the landfill facility are visible as outlined in the 1984 photograph, Figure 2-11. Significant residential and commercial development occurs west of the MSWLF. To the southeast, Biggs Army Airfield is visible.

■ Historical Aerial Photograph for Northwest El Paso dated 1991

The MSWLF boundaries are shown in the 1991 photograph, Figure 2-12. Residential development dominates the photograph. All surrounding areas to the west of the facility show increased population as compared to the 1984 photograph.

■ Historical Aerial Photograph for Northwest El Paso dated 1996

Increased development of multiple commercial and industrial buildings opposite the roadway directly bordering the MSWLF to the west is noted in the 1996 photograph Figure 2-13. No other significant changes from the 1991 aerial photograph exist.

■ Historical Aerial Photograph for Northwest El Paso dated 2003 (Appendix F)

The development of the area to the west of the landfill appears to have stabilized as indicated by the 2003 photograph, Figure 2-14. There are no significant changes visible as compared to the 1996 aerial photograph.

2.7. Land-Use Map

§330.61(g)

Figure 2-6 shows the boundary of the MSWLF and the land uses surrounding the property and actual uses within one mile of the MSWLF. The map shows the location of residences,

commercial establishments, schools, licensed day-care facilities, and recreational areas within one mile of the MSWLF boundary. No churches, cemeteries, ponds or lakes are located within one mile of the MSWLF boundary. Figure 2-5 shows that pipelines are located outside of the landfill and three green bollards in the Northwest corner of the MSWLF indicate the only electric utility easement. Figure 2-5 also depicts access roads serving the MSWLF.

2.8. Impact on Surrounding Area

2.8.1. Published Zoning Map

§330.61(h)(1)

Published zoning maps are not available for the MSWLF. The MSWLF does not have a nonconforming use nor does it require a special permit from the local government having jurisdiction.

2.8.2. Character of Surrounding Land

§330.61(h)(2)

The adjacent properties to the MSWLF within one mile are undeveloped lands within the military installation. The MSWLF is about 1,200 feet from the nearest commercial areas. Residential areas exist to the west of the MSWLF past the commercial section. Biggs Army Airfield is approximately two miles to the southeast of the MSWLF.

2.8.3. Growth Trends

§330.61(h)(3)

The land within five miles of the MSWLF beyond the military installation boundary is fully developed. A majority of the land within five miles of the MSWLF is owned by Fort Bliss. Construction activities due to BRAC are ongoing or planned for portions of the installation, but none will encroach upon the MSWLF footprint. A registered composting facility (Registration No. 42038), utilized for the biological composting of petroleum contaminated soils, is located immediately to the south of the MSWLF. Beyond the northeast corner of the MSWLF boundary is a set of railway tracks. Across the tracks are industrial buildings. Beyond the industrial buildings are residential housing, churches, and schools as shown in Figure 2-6.

2.8.4. Proximity of Residences and Other Uses

§330.61(h)(4)

The MSWLF is about 1,200 feet from the nearest commercial and residential areas. No cemeteries, historic structures and sites, archaeologically significant sites or sites having

exceptional aesthetic quality are located within one mile of the facility. Schools located within one mile of the MSWLF are listed in Table 2-1.

- Approximate Number of Residences: 2,750
- Approximate Number of Commercial Establishments: 70

2.8.5. Wells

§330.61(h)(5)

The only known wells within 500 feet of the MSWLF are groundwater production wells W3 and W3a, located approximately 350 feet north of the MSWLF. A detailed description and discussion of these wells may be found in Appendix D.

2.9. Transportation

2.9.1. Entrance Roads

§330.61(i)(1)

All access roads to the MSWLF are located on the Fort Bliss property, owned by the U.S. Army. The access road to the landfill entrance is asphalt concrete and useable by military and government personnel during all weather. The internal access roads to the former active fill areas are caliche-based roads useable during wet weather conditions. The operator maintains these internal roads to promote drainage and limit ponding during wet weather conditions. Internal roads were used only during facility operating hours. When not in operation, the facility gate is closed and locked.

2.9.2. Vehicular Traffic Volume

§330.61(i)(2)

During active life of the landfill, traffic volume was minimal as only authorized vehicles were allowed to access the site. The licensed vehicle use occurred from delivery of MSW, construction and demolition debris, and RACM material to the MSWLF. BRAC-related activities increased disposal of construction and demolition material and RACM; representing the only expected intermittent increase in vehicular volume.

2.9.3. Expected Vehicular Traffic Volume

§330.61(i)(3)

Due to BRAC activities during the active life of the landfill, a daily increase of two additional trucks from licensed Army vehicles or contractors' vehicles using the MSWLF may have occurred.. BRAC-related activities included increased amounts of construction and demolition debris and RACM material. Traffic volume data are not maintained by Fort Bliss.

2.9.4. Proposed Public Roadway Improvements

§330.61(i)(3)

The MSWLF and the roadways accessing the MSWLF are located on the Fort Bliss military installation. No public roadways exist to the MSWLF. All roadways are owned and improved by the U.S. Army, Fort Bliss. The Army is not required to coordinate with the Texas Department of Transportation.

2.9.5. Airport

§330.61(i)(5)

The MSWLF demonstrates compliance related to landfill operations impact upon airports within six miles of the MSWLF in accordance with §330.545 (relating to Airport Safety) as discussed in sections 2.9.5.1 and 2.9.5.2 below.

2.9.5.1. Impact of Facility upon Airports

30 TAC §330.545(a), requires that MSWLF permit modifications demonstrate no bird hazards for airport runway end used by piston type aircraft located within 5,000 feet of the landfill and turbojet aircrafts within 10,000 feet. No piston-type aircraft runways within 5,000 feet (0.95 miles) of the MSWLF exist. A turbo aircraft runway end used by Biggs Army Airfield is located 10,929 feet from the MSWLF.

The MSWLF is designed and operated so the unit does not pose a bird hazard to aircraft. Construction and demolition debris comprises the majority of MSWLF refuse. Subsequently, minimal bird populations exist in the surrounding area.

2.9.5.2. Airport Review Letter

30 TAC §330.545(d) requires the MSWLF to notify general public or small general service airports within six miles of all modifications to the facility. The MSWLF must also notify all large general public airports within five miles. Airport review letters sent to Biggs Army Airfield, El Paso International Airport and the Federal Aviation Administration (FAA) as well as available response letters are located in Appendix G.

2.10. General Geology and Soils Statement

2.10.1. General

§330.61(j)(1)

The MSWLF is underlain by Hueco Bolson deposits of Tertiary age and typically are composed of unconsolidated to slightly consolidated interbedded sands, clay, list, gravel, and caliche. Individual beds are not well defined and range in thickness from a fraction of an inch to about 100 feet.

The general geology and soils details for the MSWLF site are located in Appendix D (Abeyta, 1996).

2.10.2. Fault Areas

§330.61(j)(2)

The MSWLF is not located within 200 feet of a fault. A Fault Area Map is provided as Figure 5 of the document "Evaluation of Location Restrictions for the Fort Bliss Municipal Solid Waste Landfill (Permit #1422)" by [REDACTED], prepared for the U.S. Army Corps of Engineers, Fort Worth District, March 1995 (Appendix H).

2.10.3. Seismic Impact Zones

§330.61(j)(3)

According to the Seismic Zones Map from the United States Environmental Protection Agency (USEPA) "*Solid Waste Disposal Facility Criteria Technical Manual*;" EPA530 R93 017; November 1993, the MSWLF is located outside the seismic zones [REDACTED], Figure 4 of Appendix H).

2.10.4. Unstable Areas

§330.61(j)(4)

Appendix H contains the 1995 certification by [REDACTED] and [REDACTED], stating that the Fort Bliss MSWLF is not located on unstable areas. In addition, slope stability and settlement analyses for the alternative final cover design are provided in Appendix I.

2.11. Groundwater and Surface Water

2.11.1. Groundwater Conditions

§330.61(k)(1)

The primary source of groundwater in the MSWLF area is the unconsolidated and semi consolidated Hueco Bolson deposits. These deposits range between 600 and 1,200 feet below the surface and supply the City of El Paso, Ciudad Juarez (Chihuahua, Mexico) Fort Bliss Military Reservation, private industries, and agricultural areas. A thick, unsaturated layer approximately 300 ft deep lies above the Hueco Bolson deposits near the MSWLF. No known perched water tables in the vicinity of the MSWLF exist at present.

Groundwater monitoring requirements under 30 TAC §330.403 (relating to Groundwater Monitoring Systems), §330.405 (relating to Groundwater Sampling and Analysis Requirements), §330.407 (relating to Detection Monitoring Program for Type I Landfills), and §330.409 (relating to Assessment Monitoring Program) were suspended by the executive director on May 22, 1996, based on Fort Bliss' demonstrating that no potential

exists for migration of hazardous constituents from the MSWLF unit to the uppermost aquifer as defined in 30 TAC §330.3 of this title (relating to Definitions) during the active life and the closure and post-closure care period of the unit. The groundwater monitoring suspension approval is located in Appendix F.

2.11.2. Surface Water

§330.61(k)(2)

No surface water bodies exist at or near the MSWLF as noted in the 2005 Storm Water Pollution Prevention Plan. The MSWLF is located in West Texas where desert conditions exist. Daytime summer temperatures range between 90 and 105 degrees Fahrenheit (°F) and winter temperatures range from 55 to 60 °F. The surrounding area receives less than 10 inches of rain per year and relative humidity is very low. Depending upon the intensity and duration of each precipitation event, the water delivered by the occurrence may infiltrate into the soil or become surface water runoff. The infiltrated water may percolate downward to the water table or return to the atmosphere via evapotranspiration. The surface water runoff may flow downstream to the stormwater retention basin located approximately two miles south of the landfill (Figure 2-15). This pond retains runoff temporarily and releases it slowly. As mentioned previously the MSWLF is located where desert conditions exist; therefore, surface water flow in the vicinity of the MSWLF is limited.

The Rio Grande is the only perennial water body in the vicinity of the MSWLF. Runoff from the Franklin Mountains flows into the Rio Grande Basin approximately two miles west of the MSWLF.

2.11.3. TPDES Storm Water Permit

2.11.3.1. Certification Statement

§330.61(k)(1)(A)

Fort Bliss complies with all applicable Texas Pollutant Discharge Elimination System (TPDES) storm water permitting and Clean Water Act requirements. The required certification statement is located in Appendix J.

2.11.3.2. Individual Wastewater Permit

§330.61(k)(1)(B)

The MSWLF does not require coverage under an individual wastewater permit.

2.12. Abandoned Oil and Water Wells

2.12.1. Location of Existing and Abandoned Water Wells

§330.61(1)(1)

Not Applicable. No existing or abandoned water wells are located within the facility boundary.

2.12.2. Location of Oil Wells

§330.61(1)(2)

Not Applicable. No existing or abandoned oil wells are located within the facility boundary.

2.13. Floodplains and Wetlands Statement

2.13.1. Data on Floodplains

§330.61(m)(1)

The Flood Insurance Rate Map (Figure 2 of Appendix H) shows that the MSWLF is located outside the 100-year floodplain but within the 500-year flood area.

2.13.2. Wetlands Determination

§330.61(m)(2)

Figure 3 in Appendix H, from Mr. Robert Purdon, District Conservationist, United States Department of Agriculture (USDA) Soil Conservation Service dated August 1994 indicates no designated wetlands are located within the MSWLF and the surrounding area.

2.13.3. Wetlands Located Within the Facility

§330.61(m)(3)

No designated wetlands are located within the MSWLF and the surrounding area (see Section 13.2 Wetlands Determination above).

2.14. Endangered or Threatened Species

2.14.1. Impact Upon Endangered or Threatened Species

§330.61(n)(1)

No threatened or endangered species (federally listed) or critical habitat are located in the MSWLF area (*Fort Bliss Integrated Natural Resource Management Plan*, U.S. Army, 2001; *Fort Bliss Texas and New Mexico and Master Plan Draft Supplemental Environmental Impact Statement*, U.S. Army, 2006). The landfill is surrounded by mesquite coppice dune habitat. The MSWLF itself is disturbed during daily operations.

The Texas horned lizard (*Phrynosoma cornuta*), a state threatened reptile in Texas, may re-populate the area over time. Cells capped approximately five years ago at this MSWLF show establishment of at least 20 species of plants. The soil has also been repopulated by several animal species such as the Chihuahua whiptail lizard (*Cnemidophorus exsanguis*), termites (a gallery ever 34 square meters), and a number of species of ants including the genus *Pogonomermix sp.* which is the primary food source for this reptile. However, no mounds were located during Fort Bliss's studies. According to Fort Bliss documents, it is likely that upon closure the MSWLF area will gradually return to Texas horned lizard habitat.

2.14.2. Compliance Demonstrations

§330.61(n)(2)

Table 2-2 provides the specific data relating to endangered and threatened species in the El Paso region. There is no proposed height increase or proposed change that affects the facility footprint or otherwise change previous compliance demonstrations.

2.15. Texas Historical Commission Review

§330.61(o)

Appendix E contains the request for a review letter from the Texas Historical Commission documenting compliance with the Natural Resources Code, Chapter 191, Texas Antiquities Code. The letter of review will be kept on file at Fort Bliss. Please note that the Fort Bliss MSWLF is a fully developed, permitted, operational site.

2.16. Council of Governments and Local Government Review Request

§330.61(p)

The contact information for the council of governments and local government agencies has been updated as follows:

1. International Boundary and Water Commission, U.S. Section, 4191 N Mesa St, El Paso, TX 79902-1423
2. City of El Paso Department of Public Health, 5115 El Paso Dr, El Paso, TX 79905-2818
3. City of El Paso Environmental Services Department, 7968 San Paulo, El Paso, TX 79907
4. Rio Grande Council of Governments, 8037 Lockheed Drive, Suite 100
El Paso, TX 79925

Table 2-2
Endangered Species List

No change to this Table

Figure 2-1: Wind Rose Yearly Average

No change to this Figure

Figure 2-2: Wind Rose December Average

No change to this Figure

Figure 2-3: Wind Rose May Average

No change to this Figure

Figure 2-4: Wind Rose September Average

No change to this Figure

Figure 2-5: Access Roads & Existing Structures

No change to this Figure

Figure 2-6: General Location Map

No change to this Figure

Figure 2-7: Roads Within One Mile

No change to this Figure

Figure 2-8: Topographic Map

No change to this Figure

Figure 2-9: 1967 USGS Aerial Photograph

No change to this Figure

Figure 2-10: 1974 USGS Aerial Photograph

No change to this Figure

Figure 2-11: 1988 USGS Aerial Photograph

No change to this Figure

Figure 2-12: 1991 USGS Aerial Photograph

No change to this Figure

Figure 2-13: 1996 USGS Aerial Photograph

No change to this Figure

Figure 2-14: 2003 USGS Aerial Photograph

No change to this Figure

3. Part III of the Application

3.1. Site Development Plan

§330.63(a)

The Site Development Plan provides for the safeguarding of the health, welfare, and physical property of the people and the environment through consideration of geology, soil conditions, drainage, land use, zoning, adequacy of access roads and highways, and other considerations as the specific facility dictates. The Site Development Plan encompasses the items listed in this Section. Please note that the Fort Bliss MSWLF is a fully developed, permitted, operational site. This permitting action is to request approval of an optimized ET Final Cover System as an alternative final cover system for closure of the Fort Bliss Landfill.

3.2. General Facility Design

3.2.1. Facility Access

§330.63(b)(1)

The MSWLF perimeter chain link fencing with barbed wire protects the public from exposure to potential health and safety hazards and discourages unauthorized entry or uncontrolled disposal of solid waste or hazardous materials by providing a physical barrier. Further discussions of facility access are provided in Part II of the Application.

3.2.2. Waste Movement

Only municipal solid waste, C&D debris, and RACM were accepted at the MSWLF. The five landfill cells are shown on Sheet C-1 of Appendix B.

3.2.2.1. Flow Diagrams

§330.63(b)(2)(A)

The storage, processing, and disposal sequences for the various types of wastes and feedstocks received are shown on Figure 3-1.

3.2.2.2. Schematic View Drawings

§330.63(b)(2)(B)

The various phases of collection, separation, processing, and disposal applicable for the types of wastes and feedstocks received at the facility are shown on Figure 3-2.

3.2.2.3. Ventilation and Odor Control

§330.63(b)(2)(C)

No ventilation or odor control measures are needed for the MSWLF. The wastes received are generally inert and conditions are arid. All operations are outside.

3.2.2.4. Construction Details of all Storage And Processing Units and Ancillary Equipment

§330.63(b)(2)(D)

Not Applicable. No storage and processing units or ancillary equipment for these processes are used at the MSWLF.

3.2.2.5. Slab and Subsurface of Storage and Processing Components

§330.63(b)(2)(E)

Not Applicable. No storage and processing units are used at the MSWLF.

3.2.2.6. Containment Dikes or Walls

§330.63(b)(2)(F)

Not Applicable. No storage and processing units or loading and unloading areas with containment dikes or walls are used at the Fort Bliss MSWLF.

3.2.2.7. Storage of Grease, Oil and Sludge

§330.63(b)(2)(G)

Not Applicable. No storage of grease, oil, or sludge is performed at the Fort Bliss MSWLF.

3.2.2.8. Disposition of Effluent from Processing Operations

§330.63(b)(2)(H)

Not Applicable. No effluent from processing operations is disposed of at the Fort Bliss MSWLF.

3.2.2.9. Transfer Stations

§330.63(b)(2)(I)

Not Applicable. No transfer stations are located at the Fort Bliss MSWLF.

3.2.3. Sanitation

§330.63(b)(3)

Not Applicable. Solid waste processing is not performed at the MSWLF.

3.2.4. Water Pollution Control from Processing

§330.63(b)(4)

Not Applicable. No processing units are located at the MSWLF, and liquids are not generated.

3.2.5. Endangered Species Protection

§330.63(b)(5)

Not applicable. No threatened or endangered species (federally listed) or critical habitat are located in the MSWLF area (see Part II of the Application, Section 2.14).

3.3. Facility Surface Water Drainage Report

3.3.1. Drainage Analysis

§330.63(c)(1)(A)

Appendix L provides the updated facility surface water drainage report which complies with 30 TAC §330.63 and §330.303. The following information is provided:

- Drawings and Calculations
- Design of Drainage Facilities
- Sample Calculations
- Description of Hydrologic Methods and Calculations

3.3.2. Flood Control and Analysis

§330.63(c)(2)

This section is not applicable; Appendix H provides a flood insurance rate map showing that the MSWLF is located outside the 100-year floodplain but within the 500-year flood plain.

3.4. Waste Management Unit Design

Previous approved permit modifications included a 10-foot height increase to the permitted maximum cover elevation (from 3945 to 3955 feet above mean sea level) for the Subtitle D landfill area as shown on the closure design drawings in Appendix B. Based on the revised landfill closure design presented in this application, the proposed maximum elevation of waste is 3951 feet and the proposed maximum elevation of the final cover is 3955 as indicated on the cross-sections on Sheet C-8 of the revised closure design drawings.

The landfill operations for this modification will remain consistent with the 2007 Site Operating Plan (Appendix A) and the proposed Closure Plan (Appendix O).

Site features such as existing perimeter gas monitoring points and passive vent wells for the Subtitle D landfill cell construction are shown on Sheets C-2 and C-3 in Appendix B.

The approved Soil Liner Quality Control Plan for the Subtitle D cell is provided in Appendix M for reference.

3.4.1. Storage and Transfer Units

§330.63 (d)(1)

Not Applicable. No storage or transfer units exist at the MSWLF.

3.4.2. Incineration Units

§330.63 (d)(2)

Not Applicable. No incineration units exist at the MSWLF.

3.4.3. Surface Impoundments

§330.63 (d)(3)

Two surface impoundments were located within the MSWLF. The first impoundment was the leachate pond. The leachate pond was designed to accept excess leachate from the leachate collection system and contaminated water from the bermed daily working area of the Subtitle D cell and allow it to evaporate. The leachate pond volume calculation is provided in Figure 3-3. A plan view and cross-section of the leachate pond are provided in Figure 3-4. In accordance with §330.63(d)(3)(A) and (B), the leachate pond included:

- Minimum freeboard: approximately 3.5 feet as show below
 - The leachate pond was designed to contain the volume of leachate generated in a 5-year period and the contaminated water collected in the bermed daily working area from a 24-hr, 25-year storm event. This combined volume was extremely liberal in that most of the leachate was sprayed onto the face of the active landfill area over several days. The pumped volume averaged 2,800 gallons per quarter for 17 quarters (over four years). According to the leachate pumping records, a total of 8,400 gallons of leachate were pumped into the leachate pond for evaporation during the period from January 26 through May 12, 1998. The records indicate that this was the only period during which leachate was pumped to the leachate pond. Any leachate pumped to the leachate pond would evaporate quickly.

- The contaminated water volume of 3,703 ft³ as calculated in the 1995 Leachate and Contaminated Water Plan is for a contaminated area of 24,000 ft². The actual daily working area of 40' x 40' or 1,600 ft² would produce approximately 2,000 gallons or 272 ft³ of contaminated water. This is considerably less than the original design volume of 27,697 gallons or 3703 ft³.
 - The operational records indicate that a more realistic design approach would be to combine the volume of leachate generated in one quarter (2,800 gallons) with the volume of water generated in the bermed daily working area from a 24-hr, 25-year storm event (2,000 gallons). This combined volume amounts to 4,800 gallons or approximately 640 ft³. This volume is 5% of the available volume of the leachate pond and leaves a freeboard of more than 3.5 feet.
- Basis of design to prevent overtopping resulting from normal or abnormal operations: the leachate pond was designed with excess volume
 - Prevention of overfilling: the leachate pond was designed with excess volume
 - Description of wind and wave action: minimal, because the leachate pond had minimal inflows as described above
 - Run-on: a berm around the perimeter of the leachate pond prevented run-on from entering the pond
 - Malfunctions of level controllers, alarms, and other equipment: not applicable – no equipment
 - Human error: the leachate pond was designed with excess volume

The second impoundment was the bermed daily working area. The bermed daily working area was the 40' x 40' area that is used to dispose of and cover the waste that was accepted in one day. It was surrounded by a two-foot berm. The rainfall that fell within this bermed area and collected in excessive quantities was considered contaminated water. The Leachate and Contaminated Water Plan (1995, Attachment 1), approved by the TCEQ on December 27, 1995, called for this contaminated water to be removed using a vacuum truck and transported to the leachate pond for evaporation. A typical plan view of the bermed daily working area is provided in Figure 3-5. In accordance with §330.63(d)(3)(A) and (B), the bermed daily working area included:

- Minimum freeboard: approximately 1.4 feet. The depth of water within the bermed area resulting from a 24-hour 25-year storm would be about to 0.6 ft, but the Leachate and Contaminated Water Plan called for a two-foot berm around the daily working area.

- Basis of design to prevent overtopping resulting from normal or abnormal operations: the bermed daily working area was designed to retain the runoff from the 24-hr, 25-year storm event
- Prevention of overfilling: the bermed daily working area was designed to retain the runoff from the 24-hr, 25-year storm event
- Description of wind and wave action: minimal due to size of daily working area (40' x 40')
- Malfunctions of level controllers, alarms, and other equipment: not applicable – no equipment
- Human error: the berm around the daily working area was designed to provide excess volume

The original design inflow and volume computations for the leachate and contaminated water volumes and the leachate pond volume as provided in the Leachate and Contaminated Water Plan were as follow:

- Leachate generated over a 5-year period = 55,000 gal x 0.1337 ft³/gal = 7353.5 ft³
- Contaminated water volume (based on 24-hr, 25-year storm event = 2.04 inches) = 27,697.25 gal x 0.1337 ft³/gal = 3703.12 ft³
- Leachate + contaminated water volume = 7353.5 ft³ + 3703.12 ft³ = 11,056.62 ft³
- Leachate pond volume = 17,082 ft³ (Figure 3-3)

The two surface impoundments were taken out of service in 2018. Documentation of the activities to remove the impoundments will be provided in the final closure report verifying that final closure has been completed in accordance with the approved final closure plan, in accordance with 30 TAC §330.457(f)(5).

3.4.4. Landfill Units

3.4.4.1. Provisions for All-Weather Operation

§330.63(d)(4)(A)

The access road to the landfill entrance is asphalt concrete and useable during all weather conditions. The internal access roads to the former active fill areas are caliche-based roads useable during wet weather conditions. The operator will maintain these internal roads to promote drainage and limit ponding during wet weather conditions.

The paved entrance road and caliche-based roads will provide mud control for the waste hauling vehicles prior to exiting the MSWLF and returning to public access roads. Site personnel will physically remove mud accumulations on roads.

3.4.4.2. Landfill Method Proposed

§330.63(d)(4)(B)

The below grade areas at the MSWLF were filled using a trench or area fill method. Older sections were trenched. The more recently active cells were filled using area fill methods.

3.4.4.3. Elevations

§330.63(d)(4)(C)

Current and proposed landfill elevations are illustrated on the Appendix B drawings.

3.4.4.4. Calculations of Estimated Solid Waste Deposition and Operating Life

§330.63(d)(4)(D)

Calculations performed in July 2021 showed an estimated 17,800 cy of airspace remaining in the Subtitle D cell and 17,310 cy of airspace remaining in the C&D cell.

3.4.4.5. Landfill Cross-Sections

§330.63(d)(4)(E)

Sheet C-8 in Appendix B shows the landfill unit cross section.

3.4.4.6. Construction and Design Details

§330.63(d)(4)(F)

The MSWLF is a mature landfill. The MSWLF was permitted in 1982 and comprises 106 acres, of which approximately 80 acres are closed and the rest are inactive. Construction and design details are shown on Sheet C-8 of Appendix B.

3.4.4.7. Liner Quality Control Plan

§330.63(d)(4)(G)

Appendix M contains the approved Soil and Liner Quality Control Plan.

3.4.5. Arid Exemption Landfill Unit Criteria

§30 TAC 330.63 (d)(5)

Not applicable to the Fort Bliss MSWLF. Landfill units do not meet arid exemption criteria.

3.4.6. Type V Mobile Liquid Waste Processing Units

§30 TAC 330.63(d)(6)

Not applicable. No Type V mobile liquid waste processing units are located at the MSWLF.

3.4.7. Type IX Energy, Material, Gas Recovery, or Landfill Mining Waste Processing Units

§30 TAC 330.63(d)(7)

Not applicable. No Type IX waste processing units are located at the MSWLF.

3.4.8. Compost Units

§30 TAC 330.63(d)(8)

Not applicable. No compost units or operations occurred at the MSWLF. A composting facility has been constructed adjacent to the MSWLF, but is located outside the MSWLF permitted boundary.

3.4.9. Type VI Waste Processing Demonstration Facilities

§30 TAC 330.63(d)(9)

Not applicable. No Type VI waste processing demonstrations units or facilities are located at the MSWLF.

3.5. Geology Report

3.5.1. Regional Geology

3.5.1.1. Geologic Map with Text

§330.63(e)(1)(A)

The geologic map of the region with text describing the stratigraphy and lithology of the map unit is provided on Figure 9 of the Geohydrologic Site Characterization Report (Geohydrologic Report)(Abeyta, 1996) in Appendix D.

3.5.1.2. Stratigraphic Column in the Facility Area

§330.63(e)(1)(B)

The MSWLF is underlain by Hueco Bolson deposits of locally derived materials. The Hueco Bolson is a clastic-filled graben extending from a few miles north of the New Mexico-Texas border to several miles south into Mexico. Hueco Bolson deposits are of Tertiary age and primarily include fluvial and lacustrine deposits, but alluvial-fan material and Aeolian sediments also are present. Hueco Bolson deposits are reported to have a maximum thickness of about 9,000 feet within a deep structural trough paralleling the east base of the Franklin Mountains.

Hueco Bolson deposits typically are composed of fine- to medium-grained sand with interbedded lenses of clay, silt, gravel, and caliche. These deposits range from unconsolidated to slightly consolidated. Sand fragments are composed primarily of chert, granite, and porphyry. Individual beds are not well defined and range in thickness from a fraction of an inch to about 100 feet.

Consolidated igneous and sedimentary rocks ranging in age from Precambrian to Tertiary are exposed in the Franklin and Hueco mountains. Igneous rocks are predominately granitic and are composed of coarse grains of quartz and feldspar. These granitic rocks are easily weathered and are a primary source material of the bolson deposits.

(More detailed discussion is provided in Appendix D).

3.5.2. Geologic Processes Activity

§330.63(e)(2)

Discussions of fault areas, seismic impact zones and unstable areas (see Appendices D and H) provide the information about faulting and subsidence required by §330.555(b) and §330.559 (relating to fault areas and unstable areas).

3.5.3. Regional Aquifers

§330.63(e)

The regional aquifers are discussed in the Geohydrologic Report in Appendix D. This report contains the following information regarding regional aquifers:

■ Aquifer Name

The Hueco Bolson aquifer exists in the Fort Bliss region.

■ Composition of the Aquifer

A relatively thick vadose zone of approximately 300 feet overlies the aquifer of the Hueco Bolson deposits in the vicinity of the MSWLF. A deep water table prevails for all of the Fort Bliss area. Whether perched water zones exist below the MSWLF is unknown.

■ Hydraulic Properties of Aquifer

Hydraulic characteristics of the Hueco Bolson vary significantly as a result of the nonuniform nature of the beds.

■ Water Table or Artesian Conditions

The Hueco Bolson is an underground water table.

■ Hydraulically Connected Aquifers

The Hueco Bolson intermontane valley was produced by numerous diverse faults and folds and is divided into two distinct parts. The northern extension of the Hueco Bolson is

referred to as the Tularosa Basin; the southern extension is referred to as the Hueco Bolson proper, thereafter referred to as the Hueco Bolson. The Tularosa Basin and Hueco Bolson are divided indefinitely a few miles north of the New Mexico-Texas border. The Tularosa Basin has no external drainage; the Hueco Bolson is partly drained by the Rio Grande.

■ **Map of Aquifer**

A map of the Hueco Bolson aquifer is shown on Figure 5 of the Geohydrologic Report (Appendix D).

■ **Rate of Groundwater Flow**

Transmissivities of Hueco Bolson deposits under water-table conditions in the El Paso area are estimated to range from 1,340 to 37,500 feet squared per day (10,000 to 280, 000 gallons-per-day per foot).

■ **TDS Content of Groundwater**

Concentrations of dissolved solids in water from the Hueco Bolson fluvial deposits (Figure 11 of the Geohydrologic Report) range from 300 parts per million to more than 1,500 parts per million; concentrations of dissolved solids in water from underlying lake deposits are as much as 50,000 parts per million. El Paso Water Utilities reports that dissolved-solids concentrations in the MSWLF vicinity range from 297 to 625 milligrams per liter (wells JL-49-05-904 and JL-49-05-915 respectively) but concentrations have been measured as high as 1,312 milligrams per liter (well JL-49-05-914, April 7, 1992)(Table 5, Appendix D).

■ **Aquifer Recharge**

The Hueco Bolson aquifer underlying the MSWLF is recharged primarily by inflow from mountainous areas to the north, west, and east. Recharge resulting from direct infiltration of precipitation is minor due to the high evaporation and low precipitation rates.

■ **Groundwater Drawn from Aquifer**

The city-operated Sherman Well Field, located north of the MSWLF, is a primary source of ground water for the City of El Paso. The test-pumping rate of well JL-49-05-914 (the well nearest to the MSWLF having test-pumping data) was 1,972 gallons per minute on July 20, 1992; the static water level prior to pumping was 317.54 feet below land surface. El Paso Water Utilities reports that the pumping level after eight hours of pumping was 367.80 feet below land surface, resulting in a drawdown of 50.26 feet, transmissivity of 22, 200 feet squared per day (166,000 gallons-per-day per foot), and specific capacity of 39.2 gallons per minute per foot of drawdown. After the pump was shut off, the well recovered to a static water level of 317.46 feet below land surface on July 21, 1992.

3.5.4. Boring Log

§330.63(e)(4)

The geotechnical investigation along with subsurface soil exploration at the MSWLF is described in the 1993 report provided by Danny R. Anderson, P.E. Consultant, Inc. to Cardenas Salcedo and Associates, Inc. (see Appendix N). The report contains information for four borings; surface elevation location coordinates; columnar section with text showing the elevation of all contacts between soil and rock layers, description of each layer using the unified soil classification, color, degree of compaction, and moisture content. A key explaining the symbols used in the boring logs and the classification terminology for soil type, consistency, and structure are provided. The locations of the boring sites are provided in the report and are shown on Sheet 2 of Appendix B. The report provides information on the following:

■ Geotechnical Properties of the Soils and Rocks Beneath the MSWLF

§330.63(e)(4)(H)

Four borings were drilled to establish subsurface stratigraphy and to determine geotechnical properties of the soils beneath the facility. Soil stratification analysis and consistencies were determined based on laboratory tests of the soils extracted and classified from the borings. Testing of soils was performed in the laboratory to determine penetration resistance, compressive strength, and soil type. Detailed numerical results of the laboratory testing are provided in Appendix N (Anderson, 1993).

■ Identification of the Uppermost Aquifer or any other Lower Level Aquifers Hydraulically Connected

The primary groundwater in the El Paso area consist of the Hueco Bolson, Mesilla Bolson, and Rio Grande Alluvial Deposits. The un-consolidated and semi-unconsolidated sedimentary deposits of the Hueco Bolson comprise the only groundwater aquifers in the immediate vicinity of the MSWLF. The Hueco Bolson deposits are between 600 and 1200 feet deep, limiting the potential for seepage from the MSWLF to reach the aquifer. The extent to which underlying aquifers exist below the Hueco Bolson deposits is unknown.

Groundwater wells located near the MSWLF indicate that groundwater depth is much further below the landfill surface than the geotechnical boring sample depths. Groundwater wells within the vicinity are listed in the report provided in Appendix N. The majority of the wells indicate groundwater depth from the surface is over 300 feet. Geotechnical boring descended only 51.5 feet below the surface. No groundwater was encountered and no after-equilibrium measurements were made as a result of the depth to water (Anderson, 1993).

■ **Field Exploration Method**

Subsurface soil strata and existing conditions at the MSWLF were visually inspected or taken from four test borings made with an 8.5 inch hollow stem auger drilled to 51.5 feet. Samples were field extracted, classified, and identified based on depth and boring number (see Appendix N).

■ **Installation, Abandonment, and Plugging of the Borings**

Installation, abandonment and plugging of the boring was performed in accordance with rules of the commission (Anderson, 1993).

■ **Number and Depth of Borings Modified**

The extent to which the number or depth borings were modified in 1993 is unknown. No additional boring information is available for the MSWLF. Previous number and depths of the borings at the MSWLF are discussed in Appendix N.

■ **Electrical Resistivity**

Not applicable. Electrical resistivity was not utilized during soil boring operations at the MSWLF.

■ **Cross-sections of the Borings**

Cross-sections were prepared from the borings depicting the generalized strata at the facility. See Appendix N (Anderson, 1993).

■ **Investigator's Interpretations**

A narrative that describes the investigator's interpretations of the subsurface stratigraphy based upon the field investigation is provided in Appendix N.

3.5.5. Geotechnical Data

§330.63(e)(5)(A) (F)

An investigation was conducted to assess the MSWLF soils for geotechnical characteristics linked to the use and operations of the MSWLF. Subsurface soil strata and existing conditions at the MSWLF were visually inspected or taken from the four borings. Soil samples were field extracted, classified, and identified based on depth and boring number (Appendix N, [REDACTED]).

■ **Laboratory Report of Soil Characteristics**

Soil stratification analysis and consistencies were determined based on laboratory tests of the soil samples. Testing of soils was performed in the laboratory to determine penetration resistance, compressive strength, and soil type. Detailed numerical results of the laboratory testing are provided in the report located in Appendix N (see [REDACTED]).

■ **Permeability Tests on Undisturbed Soil Samples**

Soil permeability tests were performed to determine the material best suited for a liner material for the Subtitle D section of the MSWLF. The stratified soil samples obtained from the boring holes were tested by a standard Flexible Wall Permeameter to determine acceptable Saturated Porous Material conductivity for MSWLF soils. Atterberg limits, Moisture-Density Relations, and Sieve Analysis tests were also performed on soil material. Hydraulic conductivities and physical properties are documented and tabulated in the report (see Appendix N).

■ **Groundwater Depths and After Equilibrium Measurements from Soil Boring Encounters**

Groundwater wells located near the MSWLF indicate that groundwater depth is much further below the ground surface than the boring depths. Groundwater wells within the MSWLF vicinity are listed in Appendix D. The majority of the wells indicate groundwater depth from the surface is over 300 feet. Geotechnical borings descended to 51.5 feet below the surface. No groundwater was encountered, and no after equilibrium measurements were made as a result of the depth to water ([REDACTED]).

■ **Records of Water-Level Measurements**

Relevant groundwater level depths from wells located near the MSWLF are recorded in the geohydrologic report located in Appendix D. The Texas well identification code, location, use, owner, well depth, and elevation of water level above MSL are provided. No other records than those provided in Appendix D exist for the areas surrounding the MSWLF. The files are compiled by the El Paso Water Utilities and USGS files ([REDACTED], [REDACTED]).

■ **Tabulation of All Relevant Groundwater Monitoring Data from Well on Site or Adjacent**

All relevant groundwater monitoring data are tabulated on Figure 5 of Appendix D.

■ **Hydraulically Connected Aquifers**

The primary sources of ground water in the area consist of the Hueco Bolson, Mesilla Bolson, and Rio Grande Alluvian Deposits. The un-consolidated and semi-unconsolidated sedimentary deposits of the Hueco Bolson comprise the only groundwater aquifer in the immediate vicinity of the MSWLF. The Hueco Bolson deposits are between 600 and 1200 feet deep, limiting the potential for seepage from the MSWLF to reach the aquifer. The extent to which underlying aquifers exist below the Hueco Bolson deposits is unknown [REDACTED].

3.5.6. Arid Exemption

§330.63(e)(6)

Not applicable. Fort Bliss is not seeking an Arid Exemption for the MSWLF.

3.6. Groundwater Sampling and Analysis Plan

§330.63(f)

Groundwater monitoring requirements under 30 TAC §330.403 (relating to Groundwater Monitoring Systems), §330.405 (relating to Groundwater Sampling and Analysis Requirements), §330.407 (relating to Detection Monitoring Program for Type I Landfills), and §330.409 (relating to Assessment Monitoring Program) were suspended by the executive director on May 22, 1996. The TCEQ approved the groundwater monitoring suspension based on demonstration by Fort Bliss of no potential for migration of hazardous constituents from the MSWLF unit to the uppermost aquifer as defined in 30 TAC §330.3 (relating to Definitions). The suspension approval is provided in Appendix F.

3.7. Landfill Gas Management Plan

§330.63(g)

In accordance with Subchapter I of Chapter 330, all gases will be monitored at the MSWLF as described in its 1994 “*Workplan for Methane Monitoring at the Municipal Solid Waste Landfill Facility, U.S. Army Air Defense Artillery Center and Fort Bliss, El Paso, Texas.*” This Workplan was approved by TCEQ on June 9, 1995. Quarterly methane monitoring provisions are in place. The required reports and other submittals to the TCEQ are retained by the Fort Bliss Directorate of Public Works – Environmental Division (DPW-ED) in the operating record.

Conventional landfill covers typically include a gas collection layer and passive gas vents to relieve landfill gas pressures on the overlying impermeable geomembrane and minimize slope stability concerns. The optimized ET landfill cover will only consist of course-grained permeable soil; therefore, no passive gas venting system is proposed as part of the final optimized ET landfill cover design. Rather, the ET cover soils will naturally and effectively vent landfill gas, similar to the existing conditions and the daily/intermediate cover soil at the site. Additionally, the microbes in the ET cover soil will oxidize some of the methane as it vents, creating more environmentally friendly emissions. While the venting of the landfill gas may impact vegetative growth on the landfill cover, the ET cover system was designed to be effective with only 10% vegetative coverage. Based on the operational and regulatory history of the landfill (83 acres of 1970’s era waste), significant landfill gas generation is not expected. Should excessive methane concentrations be detected in perimeter landfill gas monitoring probes or ambient landfill air during routine landfill gas monitoring, corrective venting and reporting procedures are outlined in the Fort Bliss Guidance Document titled *Procedures Following a Methane Exceedance*.

3.8. Closure Plan

§330.63(h)

The approved Closure Plan has been updated to reflect the proposed changes to the final optimized ET cover design, cost estimates, and 30 TAC §330 requirements. The updated plan is located in Appendix O.

3.9. Post-Closure Plan

§330.63(i)

The approved Post-Closure Care Plan meets the requirements of 30 TAC §330.463. No changes to the Post-Closure Plan are proposed in this application. The Post-Closure Care Plan is located in Appendix P.

3.10. Cost Estimate for Closure and Post-Closure Care

§330.63(j)

As an agency of the Federal Government, Fort Bliss is not required to complete financial assurance mechanism requirements. Therefore, a closure cost estimate is not required per 30 TAC §330.5.

Figure 3-1: Waste Flow Diagram

No change to this Figure

Figure 3-2: Disposal Schematic

No change to this Figure

4. Part IV of the Application

4.1. Site Operating Plan

§300.65(a)

A Site Operations Plan (SOP) has been previously submitted. The current permit application modification does not propose any changes to the SOP.

4.2. EMS and NEPT

§330.65(b)

This section is not applicable. The MSWLF does not participate in the National Environmental Performance Track program. The installation does have an Environmental Management System that meets ISO-14001 standards but has not received approval/certification under 30 TAC §90.32.

4.3. Procedures for Recirculating Leachate or Gas Condensate into a Landfill Unit

§330.65(c)

Methane gas is managed in accordance with the current Methane Gas Management Plan. Gas condensate recirculation does not apply to the MSWLF Landfill. The leachate will be monitored and measured through the leachate monitoring pipe at least quarterly during the landfill active period and annually during the landfill post closure care period. If the leachate is more than 12 inches (30 centimeters) deep in the landfill, it is pumped out through the leachate transfer pipe and spread back in the Subtitle D cell.

4.4. Grease Trap Waste, Grit Trap Waste or Septage Processing Facilities

§330.65(d)

This section is not applicable. The MSWLF does not handle grease trap waste, grit trap waste, or septage.

Appendix B

Landfill Modification and Closure Design Drawings

List of Drawings

Sheet G-1	Cover Sheet
Sheet T-1	Survey of Existing Conditions I
Sheet T-2	Survey of Existing Conditions II
Sheet C-1	Final Cover Capping Plan
Sheet C-2	Final Cover Grading Plan I
Sheet C-3	Final Cover Grading plan II
Sheet C-4	Final Cover Storm Water Collection Plan I
Sheet C-5	Final Cover Storm Water Collection Plan II
Sheet C-6	Final Cover Landfill Cross Section
Sheet C-7	Typical Cap & Drainage Details
Sheet C-8	Typical Site Details
Sheet C-9	Erosion Control Details



7/11/2022