Implementing Operations Manual Changes

- 9VAC20-80 vs. 9VAC20-81
- Operation Manual Elements
- Implementation – DEQ perspective
- DEQ guidance document
- Implementation – Facility perspective
VSWMR 9VAC 20-80

Under current regulations:
• Ops Manual submitted with Part B permit app
• Ops Manual becomes part of facility permit
• Changes require minor permit amendment

VSWMR 9VAC 20-80

• Minor* amendments:
  written approval from DEQ + notify local gov:
  – Inspections – frequency or content
  – Training plan
  – Spill or release response procedures
  – Emergency equipment list
  – Landfill management practice
VSWMR 9VAC 20-80

Permit-by-Rule condition:

• Submit to the director an operational plan describing how the Operation standards (9VAC20-80-330D, -340D, -360D, or -370D) will be met

Amendment 7
Operations Manual Changes

• Amendment 7 removes Operations Manual from Part B Application and Permit
• Ops Manual part of the operating record
• Facilities can revise their operations manual as needed – to reflect current operations.
• Section 9VAC20-81-485 added to clarify requirements
Operations Manual Requirements

Applicability

Amendment 7 Part III
SW Disposal Facility Standards for Landfills
9VAC20-81-140. Operation requirements.

Amendment 7 Part IV
Other Solid Waste Management Facility Standards

9VAC20-81-140. Operation requirements.

“Landfill operations will be detailed in an operations manual that shall be maintained in the operating record in accordance with 9VAC20-81-485. This operations manual will include an operations plan, and inspection plan, a health and safety plan, and unauthorized waste control plan, an emergency contingency plan, and a landscaping plan meeting the requirements of this section and 9VAC20-81-485. This manual shall be made available to the department when requested. If the applicable standards of this chapter and the landfill’s Operations Manual conflict, this chapter shall take precedence.”
Operations manual requirements

**Elements** (9VAC20-81-485)

- An Operations Manual shall contain:
  - Operations Plan
  - Inspection Plan
  - Health & Safety Plan
  - Unauthorized Waste Control Plan
  - Emergency Contingency Plan
  - Landscaping Plan (only landfills)

**Certification**

- Certification page
- Signed by **Responsible Official**
- Manual must adhere to 9VAC20-81 and be consistent with current operations.
Operations manual requirements
Certification – WHEN?

- **Revisions** => Certification

- Minimum, **annual** certification by Responsible Official

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Operations manual requirements
Annual Certification

**First certification due date?**

- No later than **December 31, 2011**
- Sooner if revised
- Review and recertify annually
Operations manual requirements

Responsibility Official

• Defined in 9VAC20-81-10
• Duly authorized representative
• Responsible for overall operation
• Authority to sign documents

Q & A Guidance

Question: Amendment 7 removes the requirement for an operations manual to be included as a component of the Part B application. Will I need to modify my permit to accomplish this?

Answer: NO PERMIT AMENDMENT REQUIRED.
Operations manual requirements

Implementation

Certain essential operational information still in Part B application and will **continue to apply as a permit condition** and may only be revised by a permit modification:

- Hours of operation
- Daily disposal limit
- Wastes accepted
- Traffic routing
- Refuse cover-balance computations
- Stockpile sizing estimates

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Operations manual requirements

Implementation

- Regulatory standards prevail if contradictions

- DEQ will review during compliance inspection of operating record:
  - Essential elements
  - Certification
  - Reflect current operations
DEQ Guidance Memo No. 01-2011
Implementation of new operations manual requirements

- Operational details that continue to be part of the permit (Design Report)
- Contents of Operations Manual
- Revision of existing operations manuals
- Compliance with operations manuals
- Responsible official certification

Operations manual requirements
Implementation

Facility Perspective
In summary ....

- All facilities must have an operations manual.
- Facilities can revise their manual as needed.
- Manual is part of the operating record.
- DEQ will review during compliance inspections & check for certification.
- Regulatory standards prevail if contradictions.
- Some essential operational information still in the Part B application and only be revised by a permit modification.

Operations manual requirements

Implementation
Questions or Comments

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