



# **Texas Commission on Environmental Quality**

## **DEBRIS MANAGEMENT PLAN**

### **Attachment 2 to Annex Y of TCEQ Continuity of Operations Plan (COOP)**



**Critical Infrastructure Division**

**DRAFT** January 28, 2014

**TCEQ HURRICANE PREPARATION, RESPONSE AND RECOVERY PLAN**

Attachment 2 to Annex Y of TCEQ COOP, TCEQ Plan for Participation in State-Level Emergencies--All Hazards

**APPROVAL AND IMPLEMENTATION**

This plan is hereby accepted for implementation and supersedes all previous versions.

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## **ABLE OF CONTENTS**

1.0 EXPLANATION OF TERMS .....	1
1.1 Acronyms.....	1
1.2 Definitions .....	2
2.0 AUTHORITY AND REFERENCES .....	8
2.1 State .....	8
2.2 Federal.....	8
2.3 Mutual Aid Agreements and Contingency Plans .....	8
3.0 PURPOSE.....	9
3.1 Purpose of this Plan.....	9
3.2 Relationship to Other Plans .....	9
3.2.1 Relationship to TCEQ All Hazards Plan	
3.2.2 Relationship to Local Emergency Management Plans	
4.0 SITUATION AND ASSUMPTIONS .....	9
4.1 Situation.....	10
4.2 Assumptions.....	10
5.0 CONCEPT OF OPERATIONS.....	11
5.1 Preparation .....	11
5.2 Options for Debris Management and Disposal .....	13
5.3 Temporary staging and separating .....	14
5.3.1 Practical Considerations in Staging and Separating Wastes	
5.3.2 Requirements for Authorization of Temporary Debris Staging Sites	
5.3.3 Inspection of Sites	
5.3.4 Separating waste materials	
5.4 Recycling .....	16
5.5 Burning.....	17
5.5.1 Vegetative Debris	
5.5.2 Outdoor Burning (Uncontrolled Open-Air Incineration)	
5.5.3 Air Curtain Incineration	
5.6 Landfill .....	20
5.7 Burial On-site .....	20
5.7.1 Limitations on material allowed to be buried on-site	
5.7.2 Burial of animal carcasses	
5.8 Hazardous Waste Considerations.....	22
5.8.1 Hazardous Waste is Not “Debris”	
5.8.2 Hazardous materials and hazardous waste	
5.8.3 Household Hazardous Waste (HHW) collection	
5.9 Storm Surge Sediment Residue Sampling and Management .....	23
5.10 Surface Water Quality and Runoff of Ash from Wildfires.....	23
5.11 TCEQ Actions to Assist Affected Entities .....	23
6.0 ORGANIZATION AND ASSIGNMENT OF RESPONSIBILITIES .....	24
6.1 Organization .....	24
6.2 Assignment of Responsibilities.....	24
6.2.1 All Offices	
6.2.2 Office of Compliance and Enforcement	
6.2.3 Office of Waste	

6.2.4	Office of Water	
6.2.5	Office of Administrative Services	
6.2.5	Office of the Executive Director	
6.2.6	Office of Legal Services	
7.0	DIRECTION AND CONTROL .....	26
8.0	EMERGENCY RESPONSE LEVELS/ACTION GUIDES .....	26
9.0	CONTINUITY OF GOVERNMENT .....	27
10.0	ATTACHMENT DEVELOPMENT AND MAINTENANCE .....	27

**APPENDICES:**

- APPENDIX A: Request for Approval of Temporary Debris Management Site
- APPENDIX B: Debris Management Site Field Visit Checklist
- APPENDIX C: Debris Management Spreadsheet (Electronic File Only)
- APPENDIX D: Animal Carcass Disposal
- APPENDIX E: Affidavit for On-site Burial of Animal Carcasses
- APPENDIX F: Outdoor Burning in Texas, RG-049
- APPENDIX G: Template, Letter Authorizing Emergency Outdoor Burning
- APPENDIX H: Conditions for Burning Debris
- APPENDIX I: Wildfires: Disposal of Residential Ash
- APPENDIX J: Managing Debris from Texas Wildfires, Example Guidance for the Public
- APPENDIX K: Surface Water Quality Concerns from Wildfires in Texas

**REFERENCES:**

FEMA Debris Management Guide

## **1.0 EXPLANATION OF TERMS**

### **1.1 Acronyms**

ACI	Air Curtain Incinerator
CFR	Code of Federal Regulations
FEMA	Federal Emergency Management Agency
HHSC	Texas Health and Human Services Commission
HHW	Household Hazardous Waste
HQ	Headquarters
HS	Homeland Security
HSPD-5	Homeland Security Presidential Directive 5, Management of Domestic Incidents
IC	Incident Commander
ICS	Incident Command System
IMT	Incident Management Team
IR	Information Resources
IS	Incident Support
IST	TCEQ Incident Support Team
IT	Information Technology
JFO	Joint Field Office
JIC	Joint Information Center
LEPC	Local Emergency Planning Committee
MA	Mission Assignment
MSW	Municipal Solid Waste
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEPA	National Environmental Protection Act
NHPA	National Historic Preservation Act
NIMS	National Incident Management System
NPDES	National Pollutant Discharge Elimination System
NRF	National Response Framework
NRP	National Response Plan
NRT	National Response Team
NRC	Nuclear Regulatory Commission
OAS	TCEQ Office of Administrative Services
OCE	TCEQ Office of Compliance and Enforcement
OLS	TCEQ Office of Legal Services
OMB	Office of Management and Budget
OPR	TCEQ Office of Permitting and Registration
OSPREA	Oil Spill Prevention and Response Act
OSC	On-Scene Coordinator
PBR	TCEQ Permit by Rule
PCA	Program Cost Account
PPDR	Private Property Debris Removal
PPE	Personnel Protective Equipment

PRP	Potentially Responsible Party
PSA	Public Service Announcement
PWRT	Texas' Public Works Response Team
PW	Project Worksheet
PWS	Public Water Supply(ies)
RCRA	Resource Conservation and Recovery Act
RIOS	Radio Interoperability System
RLO	Regional Liaison Officer
RRC	Texas Railroad Commission
RRT	Regional Response Team
SARA	Superfund Amendments and Reauthorization Act of 1986
SCO	State Coordinating Officer
SERT	State Emergency Response Team
SIP	State Implementation Plan
SOC	State Operations Center
SOP	Standard Operating Procedure
SOSC	State On-Scene Coordinator
ST	TCEQ Strike Team
TAHC	Texas Animal Health Commission
TCEQ	Texas Commission on Environmental Quality
TCFP	Texas Commission on Fire Protection
TDCJ	Texas Department of Criminal Justice
TDEM	Texas Department of Emergency Management (formerly GDEM, Governor's Division of Emergency Management)
TDI	Texas Department of Insurance
TEEX	Texas Engineering Extension Service
TFC	Texas Facilities Commission
TPWD	Texas Parks and Wildlife Department
TxDOT	Texas Department of Transportation
TxDPS	Texas Department of Public Safety
TXWARN	Texas Water/Wastewater Agency Response Network
DSHS	Texas Department of State Health Services
TWC	Texas Water Code
USC	United States Code
USCG	United States Coast Guard
WMD	Weapons of Mass Destruction
WQMP	Water Quality Management Plan
WSRA	Wild and Scenic Rivers Act
WWTP	Wastewater Treatment Plant

## 1.2 Definitions

**Air Curtain Incinerator (ACI):** an incinerator that operates by projecting a curtain of air across an open chamber or pit in which combustion occurs. An incinerator of this type can be constructed above or below ground and with or without refractory walls and floor.

**Applicant or Subgrantee:** entity to which a subgrant is awarded and is accountable to the grantee for the use of the funds provided. Four types of subgrantees are eligible for FEMA Public Assistance grants:

1. State government agencies such as state department of transportation, state environmental resources agency, or state parks agency
2. Local governments such as towns, cities, counties, boroughs, municipalities, townships or local public authorities
3. Private non-profit organizations or institutions that own or operate facilities that provide certain services otherwise performed by a government agency. Eligible facilities are limited to educational, emergency, medical, utility, custodial care, irrigation, or other essential government services open to the general public such as community centers, rehabilitation facilities, homeless shelters, libraries, museums, senior citizen centers, shelter workshops, zoos, performing arts facilities, community arts centers and health and safety services of a governmental nature.
4. Federally recognized Indian Tribes or authorized tribal organizations and Alaskan native village organizations. Indian Tribal Governments may serve as a grantee instead of a subgrantee.

**Clean Air Act (CAA):** Projects funded under the Public Assistance Program such as debris clearance, removal, disposal, recycling, reduction and demolition must comply with federal, state or local air quality standards.

**Clean Water Act (CWA):** Debris removal projects such as dredging, demolition and construction of operations of sties used for debris management must comply with the requirements of the CWA, including the National Pollutant Discharge Elimination System (NPDES).

**Coastal Barrier Resources Act (CBRA):** restricts federal expenditures that encourage the development of coastal barriers, to minimize damages to natural resources. Coastal barriers are identified in the FEMA Flood Insurance Rate Maps as Coastal Barrier Resources System (CBRS) units. Costs for debris removal and emergency protective measures in designated CBRS units may be eligible for reimbursement if the actions eliminate an immediate threat to lives, public health and safety or protect improved property.

**Construction and Demolition (C&D) Debris:** damaged components of buildings and structures such as lumber and wood, gypsum wallboard, glass, metal, roofing material, tile, carpeting and floor coverings, window coverings, pipe, concrete, fully cured asphalt, equipment, furnishings and fixtures. As defined in TCEQ rules, C&D waste is waste resulting from construction or demolition projects; it includes all materials that are directly or indirectly the by-products of construction work or that result from demolition of buildings and other structures, including but not limited to paper, cartons, gypsum board, wood, excelsior, rubber and plastics.

**Debris Management Sites (DMS):** a location for local authorities to temporarily store, reduce, segregate and/or process debris before it is hauled to its final disposition. Frequently used to increase operational flexibility when landfill space is limited

**Duplication of Benefits:** No FEMA applicant will receive assistance for any loss for which financial assistance has been received under any other program or from insurance or from any other source. The use of federal or state funds, insurance settlements and other grants or cash donations granted for the same purpose constitutes a duplication of benefits.

**Electronic Waste (E-waste):** electronics that contain hazardous materials, such as cathode ray tubes, computer monitors, televisions

**Eligible:** qualifying for and meeting the requirements of the FEMA Public Assistance Program, authorized by the Robert T. Stafford Disaster Relief and Emergency Assistance Act. Eligibility is based on statute and FEMA regulations (44 CFR Parts 13 and 206), policies, fact sheets guidance and disaster-specific documents.

**Endangered Species Act (ESA)** prohibits actions that cause unnecessary harm to listed species or the destruction or adverse modification of their habitats. If a project involves the habitat of a listed species, FEMA must consult with the U.S. Fish and Wildlife Service and the National Marine Fisheries Services before approving funding.

**Executive Orders (EO):** Executive Orders issued by the President affect Public Assistance Program projects, most frequently the following:

- EO 11988 requires federal agencies to undertake responsibilities for floodplain management
- EO 11990 outlines protection of wetlands and requires analyses of impacts to wetlands
- EO 12898 requires federal agencies to evaluate disproportionate impacts to minority or low income populations

**Facility:** any publicly or privately owned building, works, system, or equipment built or manufactured, or an improved and maintained natural feature. Land used for agricultural purposes is not an eligible facility. The eligible facility must be located in the designated disaster area and must be located in the designated disaster area and must be the legal responsibility of an eligible applicant.

**Fish and Wildlife Coordination Act:** if a proposed project would destroy wildlife habitat or modify a natural stream or body of water, an evaluation of the impact of the action on fish and wildlife is required.

**Garbage:** waste that is regularly picked up by a local authority, including food, packaging, plastics and papers

**Grantee:** the governmental entity, usually the state, to which a grant is awarded by the federal government and accountable for the use of the funds provided.



**Hazardous Material (HazMat):** For the purpose of the federal and Texas Emergency Support Function #10 (ESF-10) and the Oil and Hazardous Materials Incident Annex to the National Response Plan (NRP), the term is intended to mean hazardous substances, pollutants, and contamination as defined by the NCP.

**Hazardous Substance:** Those substances which, because of quantity, concentration, physical or chemical characteristics, may pose a threat to human health or the environment when improperly treated, stored, transported, or disposed of. Hazardous substances include those defined as hazardous under federal, state, and municipal laws. A more detailed definition may be found in the NCP pursuant to section 311(b)(2)(A) of the Clean Water Act.

**Hazardous Waste:** waste with properties that make it potentially harmful to human health or the environment, regulated under RCRA. A RCRA hazardous waste appears on one of the four hazardous waste lists or exhibits at least one of the following four characteristics: ignitability, corrosivity, reactivity or toxicity.

**Household Hazardous Waste (HHW):** hazardous products and materials that are used and disposed of by residential, rather than commercial or industrial, consumers, including paints, stains, varnishes, solvents, pesticides and other products or materials containing volatile chemicals that may catch fire, react or explode under certain circumstances or that are corrosive or toxic.

**Ineligible or not eligible:** indicates that the applicant, facility work or cost does not qualify for a FEMA Public Assistance grant.

**Infectious Waste:** waste capable of causing infections in humans, including contaminated animal waste, human blood and blood products, isolation waste, pathological waste and discarded sharps (needles, scalpels or broken medical instruments).

**Major Disaster:** As defined under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5122), any natural catastrophe (including any hurricane, tornado, storm, high water, wind-driven water, tidal wave, tsunami, earthquake, volcanic eruption, landslide, mudslide, snowstorm, drought) or any fire, flood, or explosion in any part of the U.S., regardless of cause, which, in the determination of the President, causes damage of sufficient severity and magnitude to warrant disaster assistance under this Act to supplement the efforts and available resources of states, tribes, local governments, and disaster relief organizations in alleviating the damage, loss, hardship, or suffering caused.

**National Environmental Policy Act (NEPA)** requires every federal agency to follow a planning process to ensure that environmental consequences of a federally funded action are considered. Section 316 of the Stafford Act provides FEMA with statutory exclusions which exempt certain actions from the NEPA review process--generally including debris removal, clearance of roads and demolition of unsafe structures.

Compliance with other individual laws such as the Endangered Species Act, the National Historic Preservation Act, the Clean Air Act and the Clean Water Act is still required.

**National Incident Management System (NIMS):** The system mandated by HSPD-5 that provides a consistent nationwide approach for Federal, State, local, and tribal governments; the private sector; and non-governmental organizations to work effectively and efficiently together to prepare for, respond to, and recover from domestic incidents, regardless of cause, size, or complexity. To provide for interoperability and compatibility among Federal, State, local, and tribal capabilities, the NIMS includes a core set of concepts, principles, and terminology.

**Public Interest:** FEMA-Eligible debris work must be in the public interest, defined as work necessary to meet the following:

- Eliminate immediate threats to life, public health and safety
- Eliminate immediate threats of significant damage to improved public or private property
- Ensure economic recovery of the affected community to the benefit of the community at large
- Mitigate the risk to life and property by removing substantially damaged structures and associated appurtenances as needed to convert property acquired through a FEMA hazard mitigation program to uses compatible with open space, recreation, or wetlands management

**Putrescent Debris:** will decompose or rot, including animal carcasses and other fleshy organic matter

**Reasonable Cost:** A cost which in its nature and amount does not exceed that which would be incurred by a prudent person under the circumstance prevailing at the time the decision was made to incur the cost. Considerations include:

- Evaluating historical costs for similar work,
- Analyzing costs for similar work in the region
- Reviewing published unit cost data for the work,
- Comparing costs with the FEMA Schedule of Equipment Rates and Costs.

The source of costs may include the applicant's force account labor, equipment and materials; contracted services; and mutual aid agreements. (See OMB Circular A-87, *Cost Principles for State, Local and Indian Tribal Governments*; and Circular A-122, *Cost Principles for Non-Profit Organizations*)

**Recovery Operations:** In general, recovery operations begin once conditions in the disaster area stabilize and the immediate danger posed by an event has passed. Disaster recovery operations require coordination at all levels of government, often supplemented by the efforts of volunteer organizations and private industry, and are conducted in accordance with established plans and procedures for administering disaster relief programs. There are four basic ways in which disaster recovery assistance can be provided: emergency assistance (American Red Cross, mass care), technical assistance (training, evacuation, and weather information), operational assistance (response level

assistance via the Disaster District Committee) and financial assistance (grants, loans, etc.). With respect to financial assistance, activities are addressed based whether they are consistent with one of two situations: pre-Stafford Act assistance or post-Stafford Act assistance. Stafford Act assistance refers to any assistance available under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, Public Law 93-288 as amended. This assistance, which is requested through the Federal Emergency Management Agency (FEMA), includes but is not limited to fire management assistance, emergency declaration assistance and/or major disaster declaration assistance.

- Pre-Stafford Act assistance activities include coordinating and conducting disaster recovery training and damage/need assessment activities; recommending a course of action for recovery to the Emergency Management State Coordinator, State Emergency Management Director and/or Governor, and requesting the appropriate level of assistance. This may include state assistance, U.S. Department of Agriculture assistance, U.S. Small Business Administration assistance, and/or Stafford Act assistance as directed.
- Post-Stafford Act assistance activities are those activities conducted following an event that is approved for Stafford Act Assistance with the exception of the Hazard Mitigation Grant Program. These activities include designating state disaster recovery officials, establishing state Joint Field Offices and/or establishing operations in Disaster Recovery Centers, and implementing, and/or overseeing the implementation of federal assistance pursuant to the Stafford Act.

**Resource Conservation and Recovery Act (RCRA)**, which requires safe disposal of waste materials and promotes the recycling of waste materials, applies to disposal of storm debris and is of particular concern when hazardous materials may be present.

**Salvage Value:** Applicants may recover materials from disaster debris for beneficial uses; they may sell materials such as metals, woody debris, concrete, masonry or other types of debris to recyclers, construction or agricultural industries or to energy generators. Applicants that sell disaster debris for a salvage value must offset the cost of the eligible debris removal work by the revenues received from the sale of the debris, and document the revenues and report them to FEMA. Applicants that contract for debris removal may allow the contractor to take possession of the recoverable debris materials. This type of agreement must take into account the salvage value and the applicant should negotiate a credit in the contract.

**Sediment (Soil, Mud and Sand):** sediments such as soils, mud and sand deposited by floods, landslides and storm, may be contaminated by hazardous materials

**Subgrantee:** See Applicant

**Trench burning:** the operation of an air curtain incinerator using a trench and air manifold system.

**White Goods:** discarded household appliances such as refrigerators, freezers, air conditioners, heat pumps, ovens, ranges, washing machines, clothes dryers and water

heaters. Many white goods contain ozone-depleting refrigerants, mercury or compressor oils

**Wild and Scenic Rivers Act:** If a proposed project is located on a river designated as wild and scenic, FEMA is required to review it for compliance.

**Work:** FEMA characterizes work eligible for Public Assistance grants as either emergency or permanent, classified into 7 different categories identified by letters A through G. The focus of this Addendum, Debris Management, is emergency work, Category A Debris Removal and Category B Emergency Protective Measures. To be eligible, an item of work must meet all of the following:

- Be required as result of the disaster
- Be located within a designated disaster area except that sheltering and evacuation activities may be located outside of the designated disaster area
- Be the legal responsibility of an eligible applicant

## **2.0 AUTHORITY AND REFERENCES**

This plan applies to preparation, response and recovery operations related to management of debris resulting from a disaster such as a flood, tornado, hurricane, wildfire, etc. Refer to The TCEQ plan *TCEQ Participation in Management of State-Level Emergencies--All Hazards* (“All Hazards Plan”) for a listing of authorities and references broadly applicable to emergency management issues. Authorities and references applicable to debris management, but not included the the TCEQ *All Hazards* plan include:

### **2.1 State**

No additional

### **2.2 Federal**

- National Environmental Policy Act (NEPA)
- Coast Barrier Resources Act (CBRA)
- Endangered Species Act (ESA)
- National Historic Preservation Act
- Coastal Zone Management Act (CZMA)
- Fish and Wildlife Coordination Act
- Wild and Scenic Rivers Act (WSRA)
- Executive Orders (EO)
  - EO 11988
  - EO 11990
  - EO 12898

### **2.3 Mutual Aid Agreements and Contingency Plans**

- OMB Circular A-87, *Cost Principles for State, Local and Indian Tribal Governments*
- OMB Circular A-122, *Cost Principles for Non-Profit Organizations*

### **3.0 PURPOSE**

#### **3.1 Purpose of this Plan**

This plan, *Debris Management* (“Debris Plan”), is Attachment 2 to the TCEQ All Hazards Plan. The purpose of this Debris Plan is to enable TCEQ to assist communities to prepare for and recover from disasters through managing the increased solid waste that may result from these widespread events. The focus of this plan is debris that consists of materials that are not hazardous materials or wastes. Hazardous waste is not considered “debris” and is governed by regulations that are necessary to protect public health and safety and the environment. This plan provides guidance on options for managing and disposing of debris from a disaster, such as a flood or hurricane, and information about FEMA requirements that local governmental entities need to follow in order for their debris management projects to be eligible for reimbursement grants under the Public Assistance Program. TCEQ staff familiarity with these FEMA procedures will enable TCEQ to provide advice and assistance to local governments in their efforts to manage debris.

This plan includes information from TCEQ public guidance for managing storm debris from declared disasters. The recent guidance *Managing Debris from Texas Wildfires* is included as an example in Appendix J.

This plan is applicable to all TCEQ locations and programs.

#### **3.2 Relationship to Other Plans**

##### ***3.2.1 Relationship to TCEQ All Hazards Plan***

In developing this Debris Plan, an effort has been made to avoid repeating information provided in the TCEQ All Hazards Plan. The Debris Plan is not intended to be free-standing; it is intended to expand upon the debris-related information in the All Hazards Plan.

##### ***3.2.2 Relationship to Local Emergency Management Plans***

Planning by local governmental entities for managing debris generated by disasters such as hurricanes, floods, wildfires or other devastating events is an essential step in facilitating their ability to receive federal assistance. This plan is not intended to supplant local emergency management plans. It describes for TCEQ staff certain debris management concepts and procedures to enable staff to provide the appropriate level of assistance to local jurisdictions.

### **4.0 SITUATION AND ASSUMPTIONS**

## **4.1 Situation**

4.1.1 Large volumes of debris and other wastes are generated by natural disasters such as hurricanes, fires, floods, tornados and earthquakes. This debris poses significant disposal challenges for local public officials. Types of wastes (see Section 1.2 of this plan for definitions) generated by a disaster are diverse:

- Vegetative debris
- Clean lumber (not including painted, stained or chemically treated wood)
- Construction and Demolition (C&D)
- Electronic Waste (E-Waste)
- White Goods
- Garbage
- Sediments (soil, mud, sand)
- Putrescent Debris
- Infectious Waste
- Household Hazardous Waste
- Hazardous Waste, including asbestos, radioactive, and nuclear-contaminated debris
- Chemical, Biological, Radiological and Nuclear Contaminated Debris
- Vehicles and vessels

4.1.2 Severe disasters may generate debris in quantities that can overwhelm solid waste management resources and facilities or force communities to use disposal options that otherwise would not be acceptable.

4.1.3 FEMA is authorized by the Stafford Act to award federal funding to state and local governments and eligible tribal governments and non-profit organizations for disaster response and recovery activities, including assistance for debris removal.

4.1.4 To receive supplemental disaster assistance under the Public Assistance Program for debris operations, there must be a federal disaster declaration and entities applying for assistance must meet FEMA eligibility requirements.

4.1.5 TCEQ will need to provide regulatory assistance to local governmental and other entities in debris management operations, relating to compliance with environmental laws, to enable them to be eligible for FEMA reimbursement.

## **4.2 Assumptions**

4.2.1 A disaster, such as a tornado, flood, wildfire, or a hurricane with its high winds and storm surge, that causes widespread damage can result in massive amounts of debris in addition to releases of hazardous materials. Disasters such as these can affect a widespread area. Management and disposal of this debris can present significant challenges to recovering local jurisdictions.

- 4.2.2 Debris will be mixed and may include construction materials, damaged buildings, sediments, vegetative waste, putrescible waste, ash, and hazardous waste containers from household as well as commercial and industrial users. The waste will need to be separated to assure protection of public health and environment in a cost-effective manner.
- 4.2.3 Under normal circumstances, much municipal solid waste is recycled, with the remainder disposed of in landfills or incinerators. The amount of debris generated by a disaster may overwhelm these operations.
- 4.2.4 Debris will need to be removed and managed to allow safe return to normal community functioning. Debris will clog roads and pose a health risk to the community unless properly disposed of. Initial debris clearance activities necessary to ameliorate health and safety threats will include the need to establish staging areas, where mixed debris can be separated for appropriate disposal.
- 4.2.5 Debris will need to be disposed of properly to enable community recovery and return to economic viability.

## **5.0 CONCEPT OF OPERATIONS**

See *TCEQ Participation in Management of State-Level Emergencies--All Hazards Plan* (Section 5.0 Concept of Operations) for

- ***Overview***
- ***Complexity Levels of TCEQ Response***
- ***Coordination with Local, State and Federal Response Partners***
- ***TCEQ Responsibilities Assigned under Texas Government Code***
- ***Emergency Management Council***
- ***TCEQ Primary and Support Roles under the State of Texas Emergency Management Plan***
- ***TCEQ Responsibilities Assigned in Other State Plans***
- ***Health and Safety***
- ***Specialized TCEQ Capabilities***
- ***Reimbursement of Expenditures in Emergencies***
- ***Post-disaster Review and Recovery***

### **5.1 Preparation**

- 5.1.1 Preparations to lay the groundwork for debris management, made before the occurrence of a disaster or emergency, can greatly assist in response. Preparatory activities should include:
  - Assisting local jurisdictions to develop candidate debris management sites, and approve acceptable sites (see Section 5.3.2). For example, for a hurricane, determine acceptable sites prior to the annual hurricane season, no later than H-120;
  - Activating a debris management/data management system to track debris site approvals and inspections;

- Developing a protocol to staff and operate a TCEQ debris management hotline (see Section 5.11) and to activate the hotline within 24 hours as needed after a disaster occurs, with information to address and process requests regarding temporary debris management sites, stockpiling areas for use prior to burning, and staging of material for recycling, landfills or mulching of vegetation; and
- Developing a protocol for risk-based inspections of debris management sites.

5.1.2 A number of state and local regulations and rules apply to the disposal of specific types of debris. The difficult conditions that exist following a disastrous storm may make full compliance with all rules and regulations difficult for local jurisdictions, and may cause significant delay in removing storm debris from affected areas.

5.1.3 State guidance is available from the Texas Division of Emergency Management (TDEM) at [http://www.txdps.state.tx.us/dem/recovery/recovery\\_pa\\_debris\\_guide.htm](http://www.txdps.state.tx.us/dem/recovery/recovery_pa_debris_guide.htm). TCEQ will provide current guidance at a disaster-specific hot link on its external website at [www.tceq.state.tx.us](http://www.tceq.state.tx.us).

5.1.4 An important consideration in the debris management planning process is that of eligibility for cost reimbursement from FEMA from the Public Assistance Program. While FEMA indicates that a jurisdiction may conduct debris operations in any manner it deems appropriate, FEMA will reimburse only for work deemed eligible by FEMA. To receive reimbursement under the Public Assistance Program, an entity must meet requirements relating to:

- Type of entity [state government, local government, private non-profit (PNP), federally-recognized Indian Tribe]
- Type of facility (building, system, equipment, etc.)
- Type of work: eligible work is identified as seven categories (Category A through G)
- Be in the public interest
- Must be at reasonable cost
- Meet “special considerations”, including complying with environmental and historic preservation laws:
  - National Environmental Policy Act (NEPA)
  - Clean Water Act (CWA)
  - Clean Air Act (CAA)
  - Coastal Barrier Resources Act (CBRA)
  - Resource Conservation and Recovery Act (RCRA)
  - Endangered Species Act (ESA)
  - National Historic Preservation Act (NHPA)
  - Coastal Zone Management Act (CZMA)
  - Fish and Wildlife Coordination Act
  - Wild and Scenic Rivers Act (WSRA)



- Executive Orders
  - Debris management sites must have a temporary authorization from TCEQ (see Section 5.3.2).
- 5.1.5 Federal guidance is available from the U.S. Environmental Protection Agency (EPA) at <http://www.epa.gov/osw/conserves/rrr/imr/cdm/pubs/disaster.htm> and from FEMA at <http://www.fema.gov/government/grant/pa/demagde.shtm>, with information that will assist in planning efforts.
- 5.1.6 Jurisdictions will need to consult with TCEQ regarding issues related to compliance for debris issues. Compliance issues that arise during disaster declarations have been handled at TCEQ Headquarters by the Office of Compliance and Enforcement. Identifying a point of contact and distributing contact information for approving requests for temporary authorizations, debris management sites, or regulatory discretion as preparedness actions before an emergency occurs would help to minimize confusion in the event of a disaster.
- 5.1.7 TCEQ may call upon the facility to conduct air quality monitoring as warranted at sites where open burning is allowed, or assure that such monitoring is done.

**5.2 Options for Debris Management and Disposal**

- 5.2.1 Different methods for management and disposal of disaster-generated wastes are available. The appropriateness of a waste disposal method is determined by the type of waste. Options for debris management include
- Temporary staging and separating
  - Recycling
  - Open burning
  - Landfill
  - Incineration
  - Burial on-site
- 5.2.2 This chart illustrates options for storm debris management by type of debris:

Debris Type	Examples of Debris Type	Management/Disposal Options
Vegetation	Trees, Brush	Preferred: Recycle Option: Outdoor burn using an ACI, if possible Option: Type IV MSW Landfill Option: Type I MSW Landfill

<b>Debris Type</b>	<b>Examples of Debris Type</b>	<b>Management/Disposal Options</b>
Clean Lumber	Lumber, siding, plywood and similar wood materials that have not been painted, stained or chemically treated	Preferred: Recycle Option: Outdoor burn using an ACI, if possible Option: Type IV MSW Landfill Option: Type I MSW Landfill
Animal Carcasses	Non-diseased poultry, cattle, domestic animals	Preferred: On-site burial/mounding Preferred: MSW Type I Landfill Option: Outdoor burn, using an ACI if possible Option: Off-site disposal using a renderer or a commercial waste incinerator
	Diseased poultry, cattle	Preferred: Outdoor burn using an ACI, if possible
Household/Commercial Waste	Putrescible waste	MSW Type I Landfill
	Garbage, refuse, rubbish	MSW Type I Landfill
Construction or Demolition Waste	Asbestos containing debris - shingles, siding, insulation, tiles	MSW Type I Landfill with special waste authorization
	Painted/stained/treated wood	Preferred: MSW Type IV Landfill Option: MSW Type I Landfill
	Non-asbestos roof shingles	Preferred: Fuel source for cement kilns with appropriate air authorization Option: MSW Type IV Landfill Preferred: MSW Type I Landfill
White Goods	Damaged household appliances	Preferred: Recycle

### **5.3 Temporary staging and separating**

#### **5.3.1 Practical Considerations in Staging and Separating Wastes**

While it is preferable that jurisdictions encourage citizens to separate their debris at the curb before it is picked up, this may not be practicable. One strategy that local jurisdictions may consider is to develop sites where storm debris can be staged and separated for follow-on appropriate disposal. Separating wastes such as household hazardous wastes which require special storage and disposal methods from wastes which do not require the same handling can reduce disposal costs. Disposal options such as recycling can significantly reduce the demand on landfill space and contribute to cost control.

Sites can be used for

- Sorting debris for recycling or disposal
- Storing vegetative (green) wastes before transferring to another facility
- Chipping and mulching green wastes on site
- Distribution of free mulch to the public
- Burning, as long as certain requirements (air curtain incineration) and considerations are met (see Section 5.7).

### **5.3.2 Requirements for Authorization of Temporary Debris Staging Sites**

Pre-selection of temporary debris staging sites, and including this consideration in emergency management plans, has been shown to be a benefit to communities in the aftermath of a disaster.

5.3.2.1 Prospective sites should be evaluated based on the types of activities planned for the site (staging, collection, storage, sorting, recycling, landfilling, burning). Considerations should include:

- Security to prevent unauthorized dumping (e.g. dumping hazardous waste)
- Access for heavy equipment
- Lack of potential impact to environmentally sensitive areas
- Convenience to collection routes--Convenient local sites allow collection crews to reduce travel time and result in faster street clearing.
- Possible impacts to adjacent housing to identify whether noise or vermin infestation may cause nuisance conditions
- Coordination with the local police and fire departments, essential to accommodate:
  - Egress and ingress
  - Minimal site preparatory work (e.g. cement surfaces in place, not dirt)
  - Distance to schools, waterways, neighborhoods
  - Traffic patterns

5.3.2.2 Pre-use site evaluations, with documentation, can facilitate returning the sites to their original condition.

5.3.2.3 TCEQ has developed a form, in cooperation with FEMA, that jurisdictions can use to request TCEQ approval of temporary debris management sites for debris resulting from a declared state or federal disaster. The form is included in Appendix A.

### **5.3.3 Inspection of Sites**

TCEQ will inspect the sites on a regular basis, to ensure proper handling and disposal of materials. To that end, TCEQ has developed an inspection checklist and a tracking

spreadsheet to document the results of staff field visits. TCEQ will coordinate with EPA as the incident requires. See Appendix B for the TCEQ Debris Management Site Field Visit Checklist and Appendix C for a template spreadsheet for debris management sites.

### **5.3.4 Separating waste materials**

- 5.3.4.1 Failure to properly segregate waste types could jeopardize a jurisdiction's cost recovery efforts.
- 5.3.4.2 Hazardous materials and wastes will need to be separated from non-hazardous disaster debris, to avoid having to dispose of the co-mingled wastes as hazardous.
- 5.3.4.3 Any hazardous waste generated as a result of the disaster must be disposed of at a permitted hazardous waste facility.

## **5.4 Recycling**

- 5.4.1 Recycling is encouraged, and can significantly reduce disposal costs as well as the volume of debris that must be disposed of by other means. Advance planning for recycling debris will facilitate response efforts. Information about recycling can be found on TCEQ's web site at <http://www.tceq.state.tx.us/nav/main/recycling.html>.
- 5.4.2 Chipping and grinding vegetative debris:
  - Vegetative debris such as trees and brush is bulky and would consume a significant volume of landfill space if buried. This separated debris can be mulched or ground up, which would reduce its volume by as much as 75 percent.
  - Plastics should be excluded from the process.
  - Wood chips can be recycled for such uses as mulch for agricultural or landscape purposes, or fuel for industrial heating or a cogeneration plant. It is preferable that the mulch be recycled rather than placed in a landfill.
- 5.4.3 Clean lumber such as siding, plywood and similar wood materials that have not been painted, stained or otherwise chemically treated can also be recycled.
- 5.4.4 Roof shingles that do not contain asbestos can be recycled as fuel for cement kilns that have the appropriate air authorization to use this material.
- 5.4.5 White goods including refrigerators, stoves, washer/dryers and batteries should be recycled. Refrigerants and other fluids can only be reclaimed by certified technicians and disposed of at a permitted facility. Refrigerators may contain putrescent waste from decomposing food items, which needs to be separated and disposed of in a municipal solid waste (MSW) landfill.

- 5.4.7 Metals, including the metals components of white goods, can be recycled by scrap metal dealers.
- 5.4.8 Electronics items such as VCRs, computers, televisions, etc., which are included in the category of household hazardous wastes, can be recycled.
- 5.4.9 Properly emptied Compressed Gas Containers can be recycled, after initial handling as a hazardous material.
- 5.4.10 Tires should be picked up by an authorized Scrap Tire Transporter or delivered to an authorized processing or end use facility.
- 5.4.11 Soils, mud, sand and sediments that are not contaminated or hazardous can be reused as landfill cover and soil amendments.
- 5.4.12 Concrete and asphalt can be crushed and used temporarily as sub-base in roads only under emergency conditions. Some of this material may originate at industrial sites, and there may be additional requirements to determine final clean-up.

## **5.5 Burning**

During drought or high wildfire danger conditions, burning is generally not allowed. Local jurisdictions may have burn bans that prohibit burning activities. While TCEQ rules may provide for burning in emergency conditions, any burning activities must have the approval of local fire authorities and comply with local fire restrictions.

### **5.5.1 Vegetative Debris**

Burning vegetative debris can provide up to a 95 percent reduction in the volume of waste to be disposed of in a landfill.

### **5.5.2 Outdoor Burning (Uncontrolled Open-Air Incineration)**

5.5.2.1 Outdoor burning is the least desirable method of volume reduction, as there is no control over how much or how quickly it is allowed to burn and lacks any type of environmental control. Environmental evaluations, air quality monitoring and implementing control measures to limit impacts to the public and environment should be conducted. Close monitoring is needed to ensure that only clean woody debris is burned.

5.5.2.2 The TCEQ, using regulatory discretion, can authorize any public or private entity, including county and municipal governments or independent entities that have been contracted by county or local governments to burn debris from a natural disaster outdoors when no other practical alternative is available. To enact these authorizations,

TCEQ will issue letters to county judges in affected counties to approve the use of outdoor burning where necessary.

- For additional information, refer to Appendix F for TCEQ guidance: RG-049, *Outdoor Burning in Texas*. This guidance as well as other regulatory guidance can be accessed by the public on TCEQ's external web site at [http://www.tceq.state.tx.us/comm\\_exec/forms\\_pubs/pubs/rg/](http://www.tceq.state.tx.us/comm_exec/forms_pubs/pubs/rg/).
- An example of a letter to county judges authorizing outdoor burning is contained in Appendix G, and available on the Field Operations Division web page (FODWEB) at <http://mx7prd.tceq.state.tx.us/oce/fod/index.cfm?fuseaction=layouts.disaster>.
- Examples of listings of conditions under which open/outdoor burning can be used for reduction of hurricane debris, including conditions for use of ACIs, are contained in Appendix H.

5.5.2.3 Only the following is allowed to be burned outdoors without a specific case-by-case review by TCEQ regional staff:

- Brush, trees and other plant growth (vegetative waste); and
- Clean lumber (not painted, stained or treated with chemicals).

5.5.2.4 For circumstances in which burning within the provisions of the rules may not be practical, local authorities should notify the TCEQ regional office and request a case-by-case review, consistent with the following constraints:

- Burning activity may be approved at permitted landfills within permitted boundaries provided that this activity occurs on a portion of the side that has not been landfilled;
- Burning of tires, shingles, paints/solvents, plastics, insulated wire, batteries, appliances, asbestos materials and aerosol containers should be avoided, and efforts to segregate these materials must be exercised;
- Under no circumstances should compressed gas cylinders containing hazardous materials such as propane, acetylene, chlorine or any other hazardous material that may be injurious to public health and safety be burned;
- Distance to neighbors and structures should be evaluated to prevent occurrence of nuisance conditions or fire safety hazards;
- Burning should be authorized only during daylight hours;
- Debris should be separated into small manageable piles;
- Materials to be burned should be reasonably dry to prevent excessive smoke;
- Burning animal carcasses should be conducted using a trench burner if possible; and

- If the burning activity causes nuisance conditions or a traffic hazard, the burning activity must be immediately halted.

5.5.2.5 TCEQ will be expected assure that air quality monitoring is conducted as warranted downwind of sites where burning is allowed, to assure protection of public health and safety. TCEQ may call upon the facility to conduct this monitoring.

5.5.2.6 Although the TCEQ can authorize open burning under special circumstances, the preferred method when burning debris is through the use of air curtain incinerators (ACIs).

### **5.5.3 Air Curtain Incineration**

5.5.3.1 TCEQ rules authorize the use of ACIs for disposal of debris during emergency clean-up operations such as the removal and disposal of vegetative debris from a disaster such as a tornado, or hurricane.

5.5.3.2 Only the following is allowed to be burned in an ACI without a specific case-by-case review by TCEQ regional staff:

- Brush, trees and other plant growth (vegetative waste); and
- Clean lumber (not painted, stained or treated with chemicals).

5.5.3.3 Considerations for Authorizing Use of an ACI

- If used in a declared disaster to clean up the types of debris listed under 5.7.3.2, ACIs are exempt from registration requirements.
- Notification must be made to the appropriate TCEQ regional office prior to burning. Information about the burning activities is required for TCEQ records.
- TCEQ staff may perform an on-site visit to assess the site and operations.
- Once the TCEQ regional office has granted permission under these circumstances, and as long as the agreed limitations are followed, no permit is needed. Limitations include the following.
  - ACIs must be operated at least 300 feet from the nearest property line and from any other facility with an air permit. If the distance requirement cannot be met, operators will need to contact the TCEQ regional office and request a case-by-case review.
  - ACIs can operate temporarily at a site for 180 consecutive calendar days, or 600 hours, whichever occurs first. After ACI operations stop, the ACI must be removed from the site. Operators will need to contact the TCEQ regional office if an extension is necessary, and request a case-by-case review.
  - ACIs must be operated in accordance with TCEQ rules. In a case in which circumstances make operating the ACI outside

- provisions of the rules, operators will need to contact the TCEQ regional office and request a case-by-case review.
- Ash from ACI operations can be disposed of in a landfill.
  - If a trench burner configuration is used, the ash can be disposed of in the burn trench. A separate trench cannot be created for ash disposal. If ash is left in place, it must be deed recorded.
  - Record keeping is required. The operation of an ACI should be recorded and compliance demonstrated, including using a run time meter and maintaining maintain written records or a log of the hours of operation, operational or location requirement and any operating instructions being followed by the operator, including deed recordation for ash left in place. Handling of residual ash must meet closure requirements. See TCEQ ACI Permit By Rule (PBR), PBR 330 for requirements.
  - If the ACI is being used to dispose of debris created from a declared disaster within eight weeks of the event, federal requirements do not apply.

## **5.6 Landfill**

- 5.6.1 Failure to dispose of wastes in the appropriate type of landfill could jeopardize a jurisdiction's cost recovery efforts.
- 5.6.2 It is very important for landfills to inspect incoming wastes to ensure that only those waste types appropriate for each landfill are received.
- 5.6.3 Most types of wastes generated by a disaster can be safely disposed of in the appropriate type of landfill. Please refer to the chart in 5.4.2 for a reference of the wastes and appropriate types of landfill options.

## **5.7 Burial On-site**

### **5.7.1 *Limitations on material allowed to be buried on-site***

Only the following are allowed to be buried on-site:

- Ash from burning operations described in 5.7;
- Ash from residences destroyed by wildfires; and
- Animal carcasses.

Guidance for *After the Wildfires in Declared Disaster Areas in Texas: Disposing of Ash from Residential Structures* is attached in Appendix I.

### **5.7.2 *Burial of animal carcasses***



Requirements for burial of animal carcasses are described in the example guidance document for the public, *Disposing of Animal Carcasses from the Wildfires of 2011*, attached in Appendix D, and include:

- The owner or operator of a farm or facility is responsible for disposal of dead animals in a timely and sanitary manner.
- Disposal of dead animals should always be done in a manner that protects public health and safety, does not create a nuisance, and prevents the spread of disease and adverse effects on water quality.
- One preferred disposal method for animal carcasses is disposal as special waste at a Type I or Type I AE landfill as long as the landfill meets the provisions of 30 TAC 330.171(c)(2).
- Another disposal option is burial in place, with certain requirements:
  - Owners/operators should call the TCEQ regional office for assistance if burying more than 10 carcasses in one location.
  - All dead animals should be covered the same day of burial with at least two (2) feet of cover.
  - Burial site location requirements include the following.
  - **Avoid** locations
    - In an area with a high water table or permeable soils; or
    - In a floodplain.
  - Locations with acceptable characteristics:
    - Not likely to be disturbed in the near future;
    - At least 300 feet from the nearest creek, stream, pond, lake or river and at sufficient distance from standing, flowing or ground water to prevent its contamination;
    - At least 300 feet from the nearest drinking water well; and
    - At least 200 feet from adjacent property lines.
  - Pit or trench requirements:
    - 3 to 5 feet deep with stable slopes (not greater than 3 percent);
    - Clay soils, where possible; and
    - Not so deep as to risk the walls caving in.
  - Recordation is required.
    - Deed recordation can be done at a later time when the emergency is over; it is not required before the animals are buried.
    - A metes and bounds description of the burial site must be recorded in the county deed records unless the site has a certified Water Quality Management Plan (WQMP).
    - This documentation can be used in filing insurance claims, for income tax purposes and possible financial assistance.
    - A sample affidavit giving a description of the number of carcasses and the burial location is included in Appendix E.

These requirements are also contained in TCEQ RG-419, *disposal of Domestic or Exotic Livestock Carcasses*, also attached in Appendix D. Note that the citation in RG-419 for the minimum amount of cover in an MSW landfill is 30 TAC Chapter 330, §171(c)(2), which reflects the current rule.

## **5.8 Hazardous Waste Considerations**

### **5.8.1 Hazardous Waste is Not “Debris”**

Hazardous waste is not “debris” and is governed by regulations that are necessary to protect public health and safety and the environment. Co-mingled wastes containing hazardous materials or wastes must be handled as hazardous waste. Hazardous waste, including household hazardous waste, must be disposed of in a permitted hazardous waste facility. Commercial and industrial containers of hazardous materials can be carried great distances by a storm surge, and become damaged or leak. Members of the public need to be advised not to approach containers of unknown substances or hazardous materials.

### **5.8.2 Hazardous materials and hazardous waste**

TCEQ is responsible for coordinating hazardous materials state disaster response operations. Call the State of Texas 24-hour spill hot line at 1-800-832-8224 to report container locations.

### **5.8.3 Household Hazardous Waste (HHW) collection**

5.8.3.1 TCEQ can assist communities with the implementation of a collection method for storm victims to safely dispose of unusable household hazardous products and wastes.

5.8.3.2 Examples of HHW products include:

- Bleaches, disinfectants, mothballs, ammonia-based and powdered cleansers, swimming pool chemicals (chlorine tablets, muriatic acid, salts, etc.)
- Oven, toilet, drain and rug and upholstery cleaners
- Paints, thinners and turpentine, furniture stripper, wood preservatives, stains and finishes
- Pesticides, insecticides, flea collars and sprays, roach and ant killers, rat and mouse poisons and herbicides
- Floor and furniture polish
- Household and automobile batteries
- Automotive products including antifreeze, transmission and brake fluids, motor oil and gasoline wastes

5.8.3.3 These materials should be separated by residents and businesses cleaning their buildings and gathering debris.

5.8.3.4 HHW should be stored in a safe place for later disposal and managed to prevent leaks, spills and releases

5.8.3.5 Normally, municipal waste landfills are able to accommodate the small quantities of hazardous wastes generated by households without threat to

the environment. However, a disaster may increase the volume to levels that may not be appropriately disposed of in a municipal landfill.

- 5.8.3.6 Local entities can collect and move the HHW to a staging site for storage until it is collected and disposed of by a hazardous waste contractor. Contact the TCEQ before starting HHW collection activities.

## **5.9 Storm Surge Sediment Residue Sampling and Management**

Storm surge sediment residue sampling and management are discussed in Section 4.15 of the TCEQ Hurricane Plan, which is Appendix 1 of the TCEQ All Hazards Plan.

## **5.10 Surface Water Quality and Runoff of Ash from Wildfires**

Runoff carried by rains after wildfires can carry fire residues such as ash, charred substances (charcoal) and nutrients into surface water bodies. TCEQ and other agencies will be called upon to assess the affect of this runoff on surface water, and to develop recommendations for steps that can be taken to protect surface water in burned areas. A TCEQ informational flyer, *Surface Water Quality Concerns from Wildfires in Texas*, is attached in Appendix K.

Sources of information which can be used to develop protective measures appropriate for an area affected by a wildfire disaster include:

- *Burned Area Emergency Response Treatment Catalogue (BAER)*, a publication of the US Forest Service (part of US Department of Agriculture) publication, available at: [http://www.fs.fed.us/eng/pubs/pdf/BAERCAT/lo\\_res/lo\\_res.shtml](http://www.fs.fed.us/eng/pubs/pdf/BAERCAT/lo_res/lo_res.shtml);
- *Texas Forestry Best Management Practices*, a Texas Forest Service publication, available at: [http://texasforestservicetamu.edu/uploadedFiles/Sustainable/bmp/Publications/BMP%20Manual\\_Aug2010%20-%20web.pdf](http://texasforestservicetamu.edu/uploadedFiles/Sustainable/bmp/Publications/BMP%20Manual_Aug2010%20-%20web.pdf).

## **5.11 TCEQ Actions to Assist Affected Entities**

Management of the enormous quantities of debris can pose significant challenges to citizens and governmental entities in recovering from a disaster. Taking actions in advance of a disaster, and as quickly as possible after the occurrence of a disaster is essential and will assist affected parties to recover more rapidly. TCEQ debris management actions that are essential in the response and recovery phases include:

- Providing “burn guidance” letters to local jurisdictions giving authorizations for burning vegetative materials to help reduce the amount of debris going into landfills.
- Activating a Debris Management Hotline to address and process requests regarding temporary debris management sites, stockpiling areas prior to burning and staging of material for landfills or mulching. The TCEQ Field Operations Support Division maintains a toll-free number for use in disasters and emergencies, 800-687-7057, which can be readily activated when needed.

- Oversight of appropriate disposal of storm waste (non-hazardous waste such as household/municipal waste, debris, animal carcasses).
- Assessment of storm debris management sites
- Providing temporary authorizations as appropriate
- Inspecting the temporary storm debris management sites while they are in operation
- Inspect landfills in the hurricane impact zone

## **6.0 ORGANIZATION AND ASSIGNMENT OF RESPONSIBILITIES**

### **6.1 Organization**

See TCEQ All-Hazards Plan

### **6.2 Assignment of Responsibilities**

#### ***6.2.1 All Offices***

All Offices are responsible for the following:

- Ensuring the safety of staff supporting disaster operations.
- Designating and training staff to support TCEQ disaster activities and restoration of normal operations, including supporting TCEQ's staffing of the SOC by the volunteer SOC Activation Team.
- Identifying staffing needs and maintaining current notification procedures to ensure staff availability when needed.
- Developing and maintaining appropriate Standard Operating Procedures (SOPs).
- Developing and maintaining procedures to ensure that a current inventory of resources is available.
- Providing personnel, equipment and other assistance to support emergency preparation, response and recovery operations within the capabilities of that Office.
- Providing information and status updates as needed.

#### ***6.2.2 Office of Compliance and Enforcement***

The Office of Compliance and Enforcement (OCE) is the coordinating office for TCEQ's disaster and emergency response activities. OCE is responsible for statewide coordination of TCEQ assets and services.

6.2.2.1 OCE Deputy will:

- Decide on and implement a protocol for processing enforcement discretion and waiver requests.
- Coordinate with EPA as necessary.

6.2.2.2 Homeland Security will accomplish the following:

- Coordination of TCEQ's disaster preparation, response and recovery activities and operations
- Assurance of health and safety of responders and the public through conducting operations in accordance with safety standards and rules.

#### 6.2.2.3 Field Operations will:

- Develop regulatory guidance, and distribute and post to external web
  - Debris management
  - Household hazardous waste disposal
  - Burn authorizations
  - Sediment sampling
  - Carcass disposal, etc.
- Develop candidate and approve acceptable debris management sites prior to the annual hurricane season, no later than H-120.
- Develop a protocol to staff and operate a debris management hotline and activate the hotline within 24 hours as needed after landfall.
- Develop a protocol for risk-based inspections of debris management sites.
- Provide "burn guidance" letters to local jurisdictions giving authorizations for burning vegetative materials to help reduce the amount of debris going into landfills.
- Activate a Debris Management Hotline to address and process requests regarding temporary debris management sites, stockpiling areas prior to burning and staging of material for landfills or mulching.
- Oversee appropriate disposal of storm waste (non-hazardous waste such as household/municipal waste, debris, animal carcasses).
- Assess storm debris management sites
- Provide temporary authorizations as appropriate
- Inspect the temporary storm debris management sites while they are in operation
- Inspect landfills in the hurricane impact zone.
- Investigate storm surge sediment for public health risk and collect and analyze samples as indicated.
- Provide oversight for the staging and disposal of household hazardous waste displaced by the storm damage
- Provide oversight of the appropriate disposal of hazardous materials

### **6.2.3 Office of Waste**

6.2.3.1 The office of Waste will provide assistance on waste disposal issues.

6.2.3.2 The Remediation Division will:

- Update the Sediment Residue Sampling Plan to characterize potential contamination of storm sediments; and
- Participate in TCEQ evaluation of the effect of runoff on surface water quality in burned areas.

#### **6.2.4 Office of Water**

The office of water will:

- Coordinate and participate in the evaluation of the effect runoff on surface water quality in burned areas; and
- Assist in the determination of appropriate burned area protective measures.

#### **6.2.5 Office of Administrative Services**

The Office of Administrative Services will help facilitate phone services for the Debris Management Hotline.

#### **6.2.5 Office of the Executive Director**

##### **6.2.5.1 Executive Management:**

Actions which would be expected to engage the attention of the Executive Director and Deputy Executive Director, in addition to maintaining situational awareness, include:

- Providing direction and objectives, or concurring with Deputy Director, IC and Emergency Operations Center plans; and
- Providing situation updates to the Commissioners.

##### **6.2.5.2 Agency Communications will:**

- Post regulatory guidance developed by program areas to TCEQ's external web;
- Assist in developing guidance for the public for posting to the TCEQ's external web;
- Determine and activate means of distributing information in power outages, when impacted areas may not have internet access; and
- Develop Public Service Announcements (PSAs) as appropriate.

##### **6.2.5.3 Intergovernmental Relations Division will:**

Serve as TCEQ liaison with legislators and congressional members as needed

#### **6.2.6 Office of Legal Services**

The Office of Legal Services will provide legal counsel and assistance for any issues that arise related to the disaster.

### **7.0 DIRECTION AND CONTROL**

See TCEQ All Hazards Plan, Section 7.0

### **8.0 EMERGENCY RESPONSE LEVELS/ACTION GUIDES**

See TCEQ All Hazards Plan, Section 8.0

## **9.0 CONTINUITY OF GOVERNMENT**

See TCEQ All Hazards Plan, Section 9.0

## **10.0 ATTACHMENT DEVELOPMENT AND MAINTENANCE**

See TCEQ All Hazards Plan, Section 10.0