

Mathews, Barbara

From: Matoska, Maria
Sent: Friday, February 25, 2011 3:59 PM
To: Mathews, Barbara; Leamons, Bryan
Subject: FW: Operating Plans for EMS Class 3C Landfill, Class 3T Monofill and EMS Transfer Station
Attachments: Operational Rqmts3T.pdf; Operational Rqmts3C.pdf; Operational RqmtsTS.pdf

From: Phillip Fields [mailto:pfields@fieldsassociatesllc.com]
Sent: Friday, February 25, 2011 3:59 PM
To: Matoska, Maria; timp@vzw.blackberry.net
Subject: Operating Plans for EMS Class 3C Landfill, Class 3T Monofill and EMS Transfer Station

Afternoon Maria,

Please find attached updated operating plans for the above referenced facilities.

Thank you

Phillip Fields, P.E., P.G.
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Maumelle, AR 72113

Rec'd Digitally	
AFIN: 19-00091	
PMT#: 0093-STSW-MC	
RECEIVED By Barbara Mathews at 9:10 am, Feb 28, 2011	
DOC 159295	
TO: MM> file	
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OPERATING PLAN AND NARRATIVE

EMS TRANSFER STATION

PREPARED FOR:

EMS
**1784 Highway One North
Wynne, AR 72396**

PREPARED BY:

Fields & Associates, LLC
**75 Norfolk Drive
Maumelle, Arkansas 72113**

February, 2011

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1.0 GENERAL OPERATING REQUIREMENTS

Eaton-Moery Environmental Services, Inc. (EMS) owns and operates a Solid Waste Transfer Station (Facility) in Cross County, Arkansas. The Facility is operated under the authority of the Arkansas Department of Environmental Quality (ADEQ) Permit Number 0093-STSW-MC, (AFIN 19-00091).

The Facility is located approximately eight miles east of Wynne and one-quarter mile north of Arkansas State Highway 64. The Facility occupies 16.6 acres within a 150 acre tract which includes a permitted Class 3C Landfill, Class 3T waste tire monofill and a waste tire processing facility. The site is located in the east half of Section 34, Township 8 North, Range 4 East in Cross County, Arkansas.

1.1 CONFORMANCE WITH PERMIT DOCUMENTS

In accordance with Reg.22.904(p)(1) of Arkansas Regulation 22 the current operation at the Facility are in accordance with the requirements of Chapter 9 of Arkansas Regulation 22.

1.2 OPERATING HOURS

The Facility and other associated operations are open to the public Monday through Friday during the hours of 7:00 a.m. till 4:00 p.m. and Monday through Saturday from 6:00 am till 5:00 pm for internal use. The operating schedule may be revised to meet future service demands. Signs posted near the gate state the name of the owner, public dumping not allowed, no hazardous waste allowed, days and hours of operation, and the emergency contact phone number.

1.3 MEASURING, LOADING, UNLOADING

The loading and unloading areas are adequately sized and designed to allow efficient and safe loading and unloading of solid waste. The loading and unloading areas are constructed of reinforced concrete. Adequate drainage provisions and structures are also provided for these areas. The Transfer Station will implement all necessary safety precautions for protecting workers during waste processing, loading, and unloading operations.

1.4 OPERATING LICENSING, TRAINING, AND RESPONSIBILITIES

The Facility will operations in accordance with Arkansas Regulation 27 (Reg.22.904(p)(3) of Arkansas Regulation 22). The Facility employs two to three people to oversee and operate the Transfer Station. The following people are located at the site and responsible for the operation of the Transfer Station:

- Transfer Station Manager
- Operation Manager
- Assistant

The Facility trains all new transfer station employees on the overall operation of the facility. In addition, specific job training and responsibilities for each operation are given to all employees.

1.5 EQUIPMENT REQUIREMENTS

The Facility will be equipped with suitable equipment associated with the daily operation of the landfill. The necessary equipment includes:

- Skid Steer
- Trash compactor
- Mini Excavator

The equipment will be inspected on a regular basis to ensure the equipment is in good operating condition. Adequate back-up equipment will be leased, within 24 hours from equipment dealers in the area in the event of equipment breakdowns.

1.6 SAFETY

All Transfer Station personnel are required to wear protective gear depending on the task that is being performed. The safety gear includes but is not limited to hard hats, safety goggles, respirators, hearing protection. The Transfer Station provides these items to their personnel. The Facility currently has employee facilities readily available for personal hygiene. The facilities include a site building/office with potable water and sanitary facilities.

1.7 FIRE PROTECTION

Fire extinguishers are located at strategic locations at the facility for fire protection by transfer station personnel. In the event of a large fire or emergency the City of Parkin Fire Department will be called fight any major fire.

2.0 PROCEDURES FOR EXCLUDING UNAUTHORIZED WASTE

MSW is received at the Transfer Station for processing and transferred to area landfills. All incoming loads of MSW are visually inspected for the presence of excluded wastes. Excluded wastes include the following:

- Hazardous Waste and Special Materials
- Asbestos Waste
- Radioactive materials
- Explosives
- Tires
- Batteries
- Medical or infectious wastes (before or after incineration)
- Liquids
- Flammable or volatile substances
- Dead animals
- Industrial process wastes

Incoming waste streams are initially evaluated at the tipping area near the compactor box by a licensed solid waste operator trained in waste identification and receipt. A licensed solid waste operator trained in waste screening will inspect the loads while each load is dumped and loaded into the facilities compactor.

2.1 CONTINGENCY PLAN FOR UNACCEPTABLE WASTE

A temporary storage area for unacceptable wastes is designated by the waste area by the compactor. Unacceptable waste detected in the incoming waste stream is removed and either returned to the waste generator in the vehicle that transported the waste to the Transfer Station, or placed in covered storage until the waste can be properly identified and disposed. All solid waste processed at the transfer station is recycled or transported and disposed of at a permitted landfill. In addition, Transfer Station personnel are licensed operators that are trained and certified in the exclusion of hazardous and unacceptable waste.

Records are kept of all unacceptable wastes and their subsequent handling, identification and ultimate disposal. The records include quantities of waste, identification, source of waste, hauler delivering the waste to the facility, date of receipt and removal, and destination of the waste.

3.0 CONTINGENCY PLAN

3.1 OPERATIONAL CONTINGENCY PLAN

In addition to the contingency plan for receipt of unauthorized waste, the Facility is prepared to address circumstances such as the following:

- Odors,
- Surface or groundwater contamination,
- Spills,
- Equipment breakdowns,
- Fire,
- Dust,
- Excessive noise, and
- Vectors.

Each of the above issues are initially addressed by the practice of moving waste rapidly through the Facility and not storing significant volumes of waste on site. Spills are controlled with portable absorbent material stored on-site. Equipment breakdowns are addressed immediately by on-site personnel and extra parts are stored on-site.

3.2 CONTROL OF LITTER, ODOR, AND VECTORS

Vectors are attracted by the presence of garbage and stagnant water. The Transfer Station is properly managed to assure that litter is picked up and the Transfer Station is kept in a neat and orderly fashion. Transfer Station personnel control blowing litter and properly store solid waste at all times. The wastes are stored inside the building or in enclosed containers prior to shipping the waste. If solid waste at the facility is temporarily stored it is handled to prevent the attraction, harborage or breeding of insects, rodents and other vectors which may cause the following:

- Harm to public safety and the environment
- Safety hazards to individuals and surrounding properties
- Excessive odor problems, unsightliness and other nuisances

Vectors are controlled by insuring that waste is processed and stored in a self contained compactor and shipped as necessary. The Transfer Station is properly maintained and cleaned routinely to prevent odors and residual waste from accumulating at the tipping area. All waste that is processed during the day is properly secured in the self contained compactor for transport to a permitted landfill.

3.3 LEACHATE COLLECTION

Leachate, for the purposes of this application for a Transfer Station can be defined as water that comes in contact with the MSW. The ways that leachate may be generated are as follows:

- Leachate may be generated during the collection process.
- Precipitation that comes in contact with the MSW at the Transfer Station.

Because the Transfer Station is completely covered the quantity of leachate that is generated from precipitation at the Transfer station is very low. The Transfer Station has been designed so that any leachate brought into the building or generated during the various operations at the facility is managed by disposal in a below ground tank. The leachate generated is disposed in the on-site leachate pond for the Class 3C Landfill.

4.0 RECORDS AND REPORTS

4.1 RECORDS

An operating record has been established at the Facility office. Landfill personnel will prepare and file monthly operating reports for the Facility. Landfill personnel will also maintain the following records as applicable and as require Reg.22.907(a):

- 1) The Current Approved APC&EC Regulation 22
- 2) The General Permit
- 3) The Notice of Intent and associated documents
- 4) The Certificate of Need
- 5) Any required location demonstrations of the permitted facility;
- 6) Approved Closure Plan;
- 7) Waste Receipt and Disposal records
- 8) Financial assurance documentation required by Chapter 14;
- 9) Records of any periodic inspections required by this Regulation or by permit conditions, and
- 10) Any other records required by Regulation 22.

4.2 RECORDS

As required by Reg.22.904(n) EMS will prepare and submit annual reports to the ADEQ by March 31st of each year. These reports will include the following information:

- 1) Source, volume or weight, and class of solid waste received at the facility;
- 2) The volume or weight and type of recyclables recovered, if any; and
- 3) The volume or weight of solid waste removed from the facility and the disposal location.

5.0 CLOSURE PLAN

This Closure Plan and Notification of Closure for the Transfer Station facility are in accordance with Arkansas Regulation Reg.22.906 (Closure and Financial Assurance).

5.1 CLOSURE NOTIFICATION

The Transfer Station will provide notification to the ADEQ in writing of closure of the Facility 60 days prior to the proposed termination of the facility as per Reg.22.906(d)(2). The Transfer Station proposes to remove all waste material and clean all equipment in accordance with the following Closure Plan.

5.2 CLOSURE PLAN

The proposed steps for closure of the Transfer Station Facility are as follows:

1. All waste material (Class 1) located in the compactor, equipment, and containers will be placed in containers and transported to a Class 1 permitted Landfill.
2. The Transfer Station equipment and waste containers will be cleaned and remove all residual waste material.
3. All equipment and containers outside of the covered structures will be removed from the premises.

5.3 CLOSURE SCHEDULE

Closure of the Transfer Station Facility will begin following ADEQ notification and approval of the Closure Plan. The estimated schedule for completing all activities necessary for closure is presented below:

Closure Activity/Task to complete

Notify the department of intent to perform closure	1 day
Begin closure activities following ADEQ approval of Closure Plan	20 days
Load waste into containers and transport material to landfill	10 days
Clean equipment and containers	10 days
Remove equipment and containers	5 days

ESTIMATED TOTAL TIME TO COMPLETE CLOSURE

45 days

It is estimated that closure of the Facility will be completed no later than 45 days following the beginning of closure activities. If necessary, due to inclement weather or other circumstances a request to extend this schedule may be made to the Director of the ADEQ.

5. CLOSURE COST ESTIMATE

The transfer station is permitted under a general permit as a medium capacity transfer which requires the facility to maintain \$5,000.00 in financial assurance for closure.