

West, Tommi

From: Dorobati, Ali
Sent: Friday, September 13, 2013 3:27 PM
To: West, Tommi
Cc: Leamons, Bryan
Subject: FW: NOD Response for Richardson Waste Transfer Station
Attachments: 2nd NOD Response .pdf

Rec'd Digitally

AFIN: 46-00197

PMT#: 0047-STSW-A

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By WESTT at 9:38 am, Sep 16, 2013

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TO: AD>File

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From: Harmon, Jennifer K [<mailto:jkharmon@terracon.com>]
Sent: Friday, September 13, 2013 3:13 PM
To: Dorobati, Ali
Cc: richwaste@valornet.com
Subject: NOD Response for Richardson Waste Transfer Station

Good afternoon Ali-

Please find attached a response to the NOD letter dated August 14, 2013 from Mr. Jones. The situation regarding the septic tank discharge has been resolved by capping the septic tank field line and converting the tank to a holding tank.

If you have any questions, please feel free to contact me.

Respectfully,

Jennifer Harmon, E.I.
Project Manager

Terracon

25809 Interstate 30 South | Bryant, AR 72022

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September 13, 2013

Mr. Benjamin Jones, Chief
Arkansas Department of Environmental Quality
Solid Waste Management Division
5301 Northshore Drive
North Little Rock, AR 72118

Phone: (501) 682-0602

E-mail: jonesb@adeq.state.ar.us

Re: Response to NOD Letter dated August 14, 2013

Richardson Waste, Inc. – Permit Notice of Intent

Permit No: 0047-STSW-A AFIN: 46-00197

Document No.: 61117 Reference No.: 60569

Dear Mr. Jones:

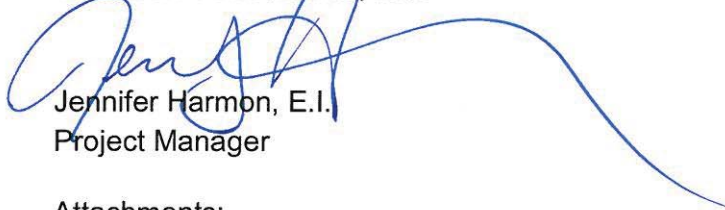
This submittal is in response to your August 14, 2013 letter containing comments related to the Richardson Waste, Inc. Notice of Intent for coverage under the Transfer Station General Permit submitted on July 27, 2011. This submittal will address the Notice of Deficiency (NOD) item and incorporate our comments to the NOD items regarding the washdown water. Only documents revised from the original submittal will be attached with this response. Please replace the previous Operating Plan with the enclosed Operating Plan for Richardson Waste, Inc.

Richardson Waste contracted a plumber to locate the field lines of an existing septic tank used to collect wash down water from the transfer station floor. The lines were located and capped during the week of August 19, 2013. Section 3.8 of the Operating Plan has been revised to remove language indicating a septic system was used on site and to include language indicating that a holding tank is used and the water is removed and sent to a wastewater treatment facility by a licensed hauler.

Thank you for your consideration of the above items. If you have any questions, please feel free to contact either of the undersigned at (501) 847-9292.

Sincerely,

Terracon Consultants, Inc.



Jennifer Harmon, E.I.
Project Manager



F. Owen, Carpenter, P.E., P.G.
Engineering Department Manager

Attachments:

Cc: Mrs. Richardson, Richardson Waste, Inc.

Terracon Consultants, Inc. 25809 I-30 South Bryant, Arkansas 72022
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ATTACHMENT A

Operating Plan

Richardson Waste, Inc.
Richardson Waste Transfer Station
Fouke, Arkansas
December 2011
Revised September 2013
Terracon Project No. 35117200

Prepared for:

Richardson Waste, Inc.
P.O. Box 1978
Texarkana, AR 75504
870-779-1429

Prepared by:

Terracon Consultants, Inc.
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Bryant, Arkansas 72022
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Geotechnical ■ Environmental ■ Construction Materials ■ Facilities

Operating Plan

Richardson Waste, Inc. ■ Fouke, Arkansas
December 2011 – Revised September 2013 ■ Terracon Project No. 35117200



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1.0 Introduction

1.1 Purpose

The Miller County Solid Waste Transfer Station was originally permitted in 1996 pursuant to Regulation 22 for solid waste transfer stations.

1.2 Facility Description

The Richardson Waste Transfer Station is located approximately 0.3 miles east of the intersection of Highway 71 and County Road 10 in Miller County, Arkansas, Section 30, Township 16 North, Range 27 West.

The facility is currently permitted to accept non-hazardous solid waste for processing and transferring to the New Boston, TX MSW Landfill or other permitted Class MSW landfills as applicable. The facility also accepts Class 4 waste and source separated recyclables.

The Richardson Waste Transfer Station accepts less than 5,200 tons annually, which meets the Type (TS) 0000-STSW-A capacity general permit requirements. The transfer station typically operates Monday through Friday from 8:00 AM to 4:30 PM and Saturday from 8:00 AM to 12:00 PM. The facility is currently permitted to accept non-hazardous solid waste for processing and transferring to the New Boston, TX MSW Landfill or other permitted MSW landfills as applicable. The facility also accepts Class 4 waste and source separated recyclables.

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Richardson Waste, Inc. ■ Fouke, Arkansas

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2.0 Professional Engineer's Certification

"I certify to the best of my professional judgment that this document and all attachments properly adhere to established, sound engineering practices. This certification is contingent on the fact that all information supplied to the signatory authority, up to the date of this certification, is unquestionably accurate and was provided in good faith."



F. Owen Carpenter, P.E., P.G.
Arkansas Professional Engineer No. 8653

9-13-2013

Date



3.0 Operating Narrative Requirements

3.1. Acceptable Waste and Ultimate Disposal. (Reg.22.904(a) & (b))

ADEQ regulations require that transfer stations are permitted to only accept household waste, and industrial waste shall be accepted at the facility except that no industrial process waste or infectious waste shall be accepted unless specifically approved by the Department. If Class 4 wastes are to be accepted for disposal at a Class 4 landfill, adequate provision shall be made for the proper separation, handling, storage and transfer of this waste.

Only waste generated from within Miller County, Arkansas will be accepted. No industrial process waste or infectious waste shall be accepted unless specifically approved by the department. Also, no special waste or hazardous waste, other than small amounts of exempt household hazardous waste, will be accepted without departmental approval and instruction. Class 4 waste will be accepted in a separate open-top container. All solid waste passing through the transfer station will be disposed of at a permitted disposal facility. All waste will be transported to the Waste Management MSW Landfill in New Boston, Texas or to other permitted Class MSW landfills.

3.2. Waste Screening (Reg. 22.904(p)(4) & (5))

Screening of incoming waste in order to identify any unacceptable waste will be done on a continuous basis and will be accomplished in two levels of inspection.

Level One: The operator will inspect each load as it is unloaded into the hopper above the compactor.

Level Two: All loads delivered to the facility in privately owned vehicles will be thoroughly inspected and the driver questioned about the nature of the waste prior to the unloading of any waste. Any suspicious loads will be rejected until adequate documentation is provided to prove that the load in question is not considered a special or hazardous waste.

In the event that a special or hazardous waste is identified, both the Solid Waste Division and Hazardous Waste Divisions of the Arkansas Department of Environmental Quality will be notified immediately for instruction; and an entry will be made in the operating records stating where the waste originated, name of the driver, license number of the delivery vehicle, type of material, and if any other waste on site is suspected of being or has been contaminated. An effort will be made to detain the vehicle until a disposal option is determined. If additional contamination is suspected, the facility will be closed and secured until corrective actions are completed and approved by ADPC&E. A record entry will also be made to indicate completion of any corrective actions required.

3.3. Storage of Solid Waste (Reg. 22.904(e))

All putrescible, class 1, solid waste received at the facility will be stored in enclosed canisters attached to the compactor, or in 48 ft. shuttle floor refuse trailers inside the processing area.

3.4. Recycling and Storage of Recoverable Waste (Reg. 22.904(g))

This facility is a designated recycling Center for Miller County. Source separated materials are accepted from the public and from other recycling efforts of the County. The following materials are accepted for recycling:

Corrugated Cardboard
Newsprint
Aluminum cans
White Goods
Steel
Appliances without refrigerant
Metals

Newsprint, Aluminum Cans, Cardboard, and White Goods are to be stored in separate or compartmentalized containers; and will be transported to local salvage dealers when practical.

3.5. Access Control (Reg. 22.904(i) & 22.904(p)(2) & (7))

This facility is equipped with a security gate across the access road. The gate will be locked at all times, except during the hours of normal operation (8:00 a.m.--4:30 p.m. Monday – Friday and 8:00 a.m. – 12:00 p.m. Saturday). Signs are posted at the security gate to indicate the hours of operation and the types of waste accepted and not accepted, and to direct all persons entering the site to report to the operator before depositing any waste or recyclable materials. Other signs will be posted as required at the facility.

3.6. Supervision of Facility and Records (Reg 22.904(h) & 22.904(p)(4))

The transfer station supervisor shall be a licensed on-site operator who has been certified in accordance with Regulation 27 of the Commission. He or she shall be on duty at all times during operations. The facility supervisor shall be in responsible charge of all operational activities and shall make all on-site decisions that affect the normal daily operations of the facility. The facility supervisor is charged with ensuring that the facility is operated in compliance of all pertinent regulations and this operating plan. He or she is also charged with the direct supervision of any temporary or permanent workers that may be assigned to assist in the operations of the facility. It shall be the responsibility of the supervisor to keep in good form the following required records:

- a. Waste Screening Log - Entries will be made in accordance with Section 2.0 of this operating plan.

- b. Recycling Logs - Record the volume or weight of recyclable recovered. This will be accomplished by making entries after the materials have been marketed; not as the materials are received.
- c. Waste Logs - Record the source, volume and class of solid waste as it is received, and record all volume or weight, and the disposal location from the landfill receipts of waste transported from the transfer station.

3.7. Annual Reporting (Reg. 22.904 (n))

Annually, the supervisor shall utilize these operating logs to prepare a report to the Department. This report shall cover the operations for the previous twelve months, and shall be prepared on forms provided by the Department. Contents of the annual report shall at a minimum include:

- a. Source, volume or weight, and class of solid waste received at the facility;
- b. The volume or weight and type of recyclables recovered; and
- c. The volume or weight of solid waste removed from the facility and the disposal location.

3.8. Control of Litter, Insects, Odors and Vectors (Reg. 22.904 (j))

The facility shall be operated in a manner which prevents: the attraction, harborage, and breeding of Insects, rodents and other disease vectors; excessive odor problems, unsightliness; and other nuisances; safety hazards to individuals and surrounding property. All working surfaces that come in contact with wastes will be washed down on a weekly basis. Facilities will be swept daily and washed down at least one time per week to prevent the creation of odors. The supervisor will take measures to ensure that all run-off from the wash down is directed to the septic system just south of the working area of the transfer station, and that all floors and surfaces are free of standing water. The 2,000 gallon holding tank receives the wash down water. The tank is periodically pumped by a licensed hauler and taken to a wastewater facility for treatment.. All residuals will be placed in the appropriate storage container for disposal or recycling. Also, special care shall be taken to prevent all electrical components from coming into contact with water.

Windblown material and litter will be controlled through several methods, including proper unloading procedures, perimeter fences, the orientation of the facility to the prevailing wind direction, landscaping, and adequate staffing. Personnel will police the facility, including fences, access roads, and the entrance gate, every operating day to pick up and return windblown material and litter to the facility and perform such other litter control measures, as necessary.

At no time will the supervisor allow the site to become unsightly or threaten surrounding property. The facility will at all times be kept in a neat and orderly appearance. All waste end recyclables will be stored in their designated containers and storage areas.

3.9. Employee Facilities (Reg. 22.904(o))

An enclosed office will be provided for employees. A First-Aid Kit will be maintained in the office building, as well as a telephone. Also, restroom facilities will be provided.

3.10. On-Site and Transport Equipment (Reg. 22.904 (p)(6))

The following equipment will be kept on site and maintained in working condition: Two Hydraulic Compactor Units, Three 40 Cubic yard roll-off waste canister recycling containers, two portable hand-held fire extinguishers, and emergency eye wash equipment. We currently receive and transport waste in 48 ft. shuttle floor refuse trailers. When additional equipment is required, a list will be submitted to ADEQ for approval. In the event of equipment failure which restricts the ability of the facility to perform, standby equipment will be leased or private contractors will be hired to fulfill the required duties of this facility. All breakdowns will be reported to ADEQ immediately by telephone and in writing if requested by the department. When a written report is required a summary of how operations will be continued will be submitted.

3.11. Safety Hazards (Reg. 22.904 (p)(8))

The potential safety hazards at this facility range from trip hazards to chemical burns. Some of the most obvious safety hazards are: trip hazards, injury from unsafe operation of equipment, possible contact with dangerous chemicals, fire, etc. Safety rails shall be installed and will be inspected daily to prevent personnel from falling to the lower level. The work areas shall be policed as required to ensure that trip hazards are removed. Emergency eye wash equipment shall be maintained in the office building. Two portable fire extinguishers will be maintained on site at all times. A garden hose with a spray nozzle shall be maintained for use in the event emergency wash-down of personnel or equipment is required.

Safety goggles, hard hats, dust masks, and single hearing protection will be maintained in the office building and made available to all employees as required by specific job tasks and as determined by the on-site facility supervisor. A list of emergency telephone numbers will be maintained near the telephone in the office building.

3.12. Fire Fighting Procedure (Reg. 22.904 (p)(9))

In the event of a fire at the facility it shall be the responsibility of the supervisor to immediately contact the local fire department using the available communication systems. After notifying the fire department the following procedures shall be followed:

Note: If at any time the fire is out of control, immediately evacuate all personnel from the facility. (A fire shall be considered out of control any time it advances in size greater than 4'X 4' or 15 sq. ft. or whenever the smoke concentration prevents visual inspection of the fire.)

- a. Secure all electrical power to the facility at the main breaker, and station a guard at the gate to keep the access road clear for emergency vehicles.

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Note: Never fight an electrical fire with water. A CO2 extinguisher or dry chemical extinguisher is best suited for this type of fire. CO2 is preferred because of the corrosive qualities of the dry chemical. Always wear gloves when discharging a CO2 extinguisher.

- b. If possible, detach the burning receptacle from the compactor and drag it to a safe location clear of the operating area and the waste tire trailer (at least 25 ft). Do not attempt to extinguish a fire in an enclosed waste receptacle.
- c. Utilize portable fire extinguisher, and the water hose to combat the fire. Direct the discharge from the extinguisher at the base of the fire. Be familiar with the effective range of each individual extinguisher.

Note: Do not use water to combat a flammable liquid fire. Water will spread these fires and create an even greater problem.

- d. When the fire is extinguished, remain on guard over the affected area until the fire fighters arrive on the scene.

When events take place that prevent the transfer station from operating, such as fires, equipment failure, surface or ground water contamination, odors, dust, noise, and vectors. The facility will be closed and all waste will be diverted to a permitted solid waste disposal facility using collection vehicles. The Department will be notified immediately.

If damage only partially impairs operations, such as, breakdown of the roll-off truck, compactor or other undesirable conditions, then contractors will be hired to transport the waste or the affected part of the operation will be secured until corrective actions have been made or a suitable temporary solution is approved by the Department. Delivery of unapproved waste will be handled in accordance with Section 2, "Waste Screening" of this plan.

3.13. Contingency Plan (Reg. 22.904(p)(10))

In the unlikely event that a fire or other emergency occurs, the facility will implement the emergency response plan (ERP). Spills or releases of hazardous materials are governed by Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency (EPA). The plan also covers other potential emergencies such as surface water contamination, fires, excessive odors, and/or other undesirable conditions requiring emergency management/response plans. Facility personnel will be trained, as needed, to properly implement the emergency management, emergency response and/or fire prevention plans.

3.14. Closure Plan (Reg. 22.904(p)(11))

As required by ADEQ general permit condition no. 5, Richardson Waste, Inc. has included a closure plan calculation form in **Attachment A** of this document. The financial assurance closure calculation for a Capacity A permit should be \$5,000.00. A copy of the complete

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financial assurance can be found in the Department record number 60670. The facility Closure Plan shall be updated annually and submitted to ADEQ in the facility annual report. If there are changes to the Closure Plan, the Operating Plan will be revised accordingly and submitted to ADEQ. In the unlikely event that the facility closes, Richardson Waste, Inc. will adhere to the following steps:

- a. Notify ADEQ in writing sixty (60) days prior to the proposed termination date of the facility.
- b. Remove and dispose of all waste at a properly permitted disposal facility within ten (10) days of ceasing operations.
- c. Bring the facility and equipment to a sanitary condition. Arrange for a final cleaning of any containers, equipment, machines, floors, and facility surfaces having come in contact with source-separated organic waste or solid waste.
- d. All closure activities will be completed no later than 45 days after the termination date of facility operations unless otherwise approved by ADEQ.

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ATTACHMENT A

RICHARDSON WASTE, INC TRANSFER STATION CLOSURE COST ESTIMATE

ADEQ Solid Waste Permit No. Renewal NOI: **0047-STSW-A**

Updated **Dec-11**

ADEQ AFIN No. **46-00197**

Regulation 22.906 - Closure and Financial Assurance

Financial Assurance Requirements - Owners and operators of permitted transfer stations shall post financial assurance in accordance with the requirements of this regulation if required by the Director. In considering whether financial assurance will be required, the Director may consider:

- (1) The size of the facility and the risk of environmental contamination; and
- (2) The relative risk of the owner or operator to become financially incapacitated to the point that 150% of the maximum permitted amount of all solid waste and recovered material ever stored on site at one time can be transported and disposed of by landfilling in a permitted Class I landfill by a third party.

Facility Closure Cost Summary (ADEQ General Permit Condition No. 5)

Capacity A Permit: 5,200 tons permitted maximum throughput per calendar year (January – December)

Note: Tonnage does not include source separated recyclables accepted at the facility.

Waste acceptance tons/week: 50

Waste acceptance tons/year: 5,200

Waste acceptance tons/day: 20

Three (3) Day Storage Limit Tonnage 60

Load, Haul, and Disposal Cost/ton \$ 54.00

Closure Cost: \$ 3,240.00

150% of Closure Cost: \$ 4,860.00

ADEQ Financial Assurance Amount = \$5,000.00

Assumptions

Loading Cost/ton \$ 4.00 Hauling Cost/ton \$ 8.00

Disposal Cost/ton \$ 42.00

ADEQ General Permit Notes:

Certain upfront cost, engineering, bid and advertisement costs, cleanup and disposal of waters and other contingencies are considered and are build into these factors and the 150% adjuster. Annual updates are not required as these estimates are adequate to incorporate annual inflation adjustments for the next five years. The factors may be revised at any time through revisions to this permit and rationale if necessary (22.906).