

FINAL DETERMINATION

PERMIT RENEWAL

Sanders Lead Company Inc.  
P.O. Drawer 707  
Troy, Alabama 36081

Sanders Lead Company, Inc. Industrial Landfill  
Permit No. 55-06

May 14, 2019

The Sanders Lead Company Inc. applied to the Alabama Department of Environmental Management (ADEM) for renewal of the Solid Waste Disposal Facility Permit for the Sanders Lead Company, Inc., Industrial Landfill. The waste stream for the Sanders Lead Company, Inc., Industrial Landfill will remain non-hazardous industrial waste, construction/demolition debris, and wastewater pretreatment plant solids. The service area for the Sanders Lead Company, Inc., Industrial Landfill will remain as Sanders Lead Company, Inc., KW Plastics, KW Plastics rail yard facility, KW Plastics Recycling Division, Wiley Sanders Truck Lines, Inc., and KW Plastics Container Facility. All located in Troy, Pike County, Alabama under common ownership. The maximum average daily volume of waste disposed at the Sanders Lead Company, Inc., Industrial Landfill will remain as 200 cubic yards per day. All conditions of the current permit for the Sanders Lead Company, Inc. Industrial Landfill Solid Waste Facility including previously approved variances and special conditions have been requested and would be granted in the renewed permit.

The landfill is located in Sections 5 & 6, Township 9 North, Range 21 East in Pike County, Alabama. The permitted facility consists of approximately 243 acres with 10 acres for disposal operations.

A public comment period was announced by ADEM on XXXXXXXXXXXX and ended on XXXXXXXXXXXX. The permit application and draft permit was available for inspection at the Alabama Department of Environmental Management. The Department received no comments during the comment period.

The Land Division has determined that the renewal of the permit meets the applicable requirements of ADEM's Administrative Codes Division 13.

Technical Contact:

C. Preston Waid  
Solid Waste Engineering Section  
Land Division  
(334) 270-5628



ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

# SOLID WASTE DISPOSAL FACILITY PERMIT

**PERMITTEE:** Sanders Lead Company, Inc.

**FACILITY NAME:** Sanders Lead Company, Inc. Industrial Landfill

**FACILITY LOCATION:** Sections 5 and 6, Township 9 North, Range 21 East in Pike County, Alabama. The total permitted area is approximately 243 acres with 10 acres approved for disposal.

**PERMIT NUMBER:** 55-06

**PERMIT TYPE:** Industrial Landfill

**WASTE APPROVED FOR DISPOSAL:** Non-hazardous industrial waste, construction/demolition debris, and wastewater pretreatment plant solids.

**APPROVED WASTE VOLUME:** Maximum Daily Volume of 200 cubic yards per day

**APPROVED SERVICE AREA:** Sanders Lead Company, Inc., KW Plastics, KW Plastics rail yard facility, KW Plastics Recycling Division, Wiley Sanders Truck Lines, Inc., and KW Plastics Container Facility. All located in Troy, Pike County, Alabama under common ownership.

*In accordance with and subject to the provisions of the Alabama Solid Wastes and Recyclable Materials Management Act, as amended, Code of Alabama 1975, SS 22-27-1 to 22-27-27 ("SWRMMA"), the Alabama Environmental Management Act, as amended, Code of Alabama 1975, SS 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to dispose of the above-described solid wastes at the above-described facility location.*

**ISSUANCE DATE:** XXXXXXXX

**EFFECTIVE DATE:** July 15, 2019

**EXPIRATION DATE:** July 14, 2024

**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
SOLID WASTE PERMIT**

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Permittee: Sanders Lead Company Inc.  
100 Sanders Road  
P.O. Drawer 707  
Troy, Alabama 36081

Landfill Name: Sanders Lead Company Inc. Industrial Landfill

Landfill Location: Sections 5 and 6, Township 9 North, Range 21 East in Pike County, Alabama.

Permit Number: 55-06

Landfill Type: Industrial Landfill

Pursuant to the Solid Wastes & Recyclable Materials Management Act, Code of Alabama 1975, §§22-27-1, *et seq.*, as amended (the "Act"), and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM), this permit is issued to Sanders Lead Company Inc. (hereinafter called the Permittee), to operate a solid waste disposal facility, known as the Sanders Lead Company Inc., Industrial Landfill.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions set forth herein (including those in any attachments), and the applicable regulations contained in Chapters 335-13-1 through 335-13-15 of the ADEM Administrative Code (hereinafter referred to as the "ADEM Admin. Code"). Rules cited are set forth in this document for the purpose of Permittee reference. Any Rule that is cited incorrectly in this document does not constitute grounds for noncompliance on the part of the Permittee. Applicable ADEM Administrative Codes are those that are in effect on the date of issuance of this permit or any revisions approved after permit issuance.

This permit is based on the information submitted to ADEM on May 22, 2018 for permit renewal and is known as the Permit Application (hereby incorporated by reference and hereinafter referred to as the Application). Any inaccuracies found in this information could lead to the termination or modification of this permit and potential enforcement action. The Permittee must inform ADEM of any deviation from or changes in the information in the Application that would affect the Permittee's ability to comply with the applicable ADEM Admin. Code or permit conditions.

This permit is effective as of **XXXXXXXXXX** and shall remain in effect until **XXXXXXXXXX**, unless suspended or revoked.

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Alabama Department of Environmental Management

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Date Signed

## SECTION I. STANDARD CONDITIONS

- A. Effect of Permit. The Permittee is allowed to dispose of nonhazardous solid waste in accordance with the conditions of this permit and ADEM Administrative Code, Division 13. Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Except for actions brought under Code of Alabama 1975, Section 22-27-1, *et seq.*, as amended, compliance with the conditions of this permit shall be deemed to be compliance with applicable requirements in effect as of the date of issuance of this permit and any future revisions.
- B. Permit Actions. This permit may be suspended, revoked or modified for cause. The filing of a request for a permit modification or the notification of planned changes or anticipated noncompliance on the part of the Permittee, and the suspension or revocation does not stay the applicability or enforceability of any permit condition.
- C. Severability. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- D. Definitions. For the purpose of this permit, terms used herein shall have the same meaning as those in ADEM Administrative Code, Division 13, unless this permit specifically provides otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.
1. "EPA" for purposes of this permit means the United States Environmental Protection Agency.
  2. "Permit Application" for the purposes of this permit, means all permit application forms, design plans, operational plans, closure plans, technical data, reports, specifications, plats, geological and hydrological reports, and other materials which are submitted to the Department in pursuit of a solid waste disposal permit.
- E. Duties and Requirements.
1. Duty to Comply. The Permittee must comply with all conditions of this permit except to the extent and for the duration such noncompliance is authorized by a variance granted by the Department. Any permit noncompliance, other than noncompliance authorized by a variance, constitutes a violation of Code of Alabama 1975, Section 22-27-1 *et seq.*, as amended, and is grounds for enforcement action, permit suspension, revocation, modification, and/or denial of a permit renewal application.
  2. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit. The renewal application must be submitted to the Department at least 180 days before this permit expires.
  3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application as required by Section I, Paragraph E, Subparagraph 2, and, through no fault of the Permittee, the Department has not made a final decision regarding the renewal application.
  4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.
  5. Duty to Mitigate. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit.
7. Duty to Provide Information. If requested, the Permittee shall furnish to ADEM, within a reasonable time, any information that ADEM may reasonably need to determine whether cause exists for denying, suspending, revoking, or modifying this permit, or to determine compliance with this permit. If requested, the Permittee shall also furnish the Department with copies of records kept as a requirement of this permit.
8. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the employees of the Department or their authorized representative to:
  - a. Enter at reasonable times the Permittee's premises where the regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
  - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.
  - d. Sample or monitor, at reasonable times, any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by Code of Alabama 1975, Section 22-27-1 *et seq.*
9. Monitoring, Corrective Actions, and Records.
  - a. Samples and measurements taken for the purpose of monitoring or corrective action shall be representative of the monitored activity. The methods used to obtain representative samples to be analyzed must be the appropriate method from Chapter 335-13-4 or the methods as specified in the Application and incorporated by reference. Laboratory methods must be those specified in Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), other appropriate EPA methods, or as specified in the Application. All field tests must be conducted using approved EPA test kits and procedures.
  - b. The Permittee shall retain records, at the location specified in Section I, Paragraph I, of all monitoring, or corrective action information, including all calibration and maintenance records, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record or for periods elsewhere specified in this permit. These periods may be extended by the request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
  - c. Records of monitoring and corrective action information shall include:
    - i. The exact place, date, and time of sampling or measurement.
    - ii. The individual(s) and company who performed the sampling or measurements.
    - iii. The date(s) analyses were performed.
    - iv. The individual(s) and company who performed the analyses.

- v. The analytical techniques or methods used.
      - vi. The results of such analyses.
    - d. The Permittee shall submit all monitoring and corrective action results at the interval specified elsewhere in this permit.
  - 10. Reporting Planned Changes. The Permittee shall notify the Department, in the form of a request for permit modification, at least 90 days prior to any change in the permitted service area, increase in the waste received, or change in the design or operating procedure as described in this permit, including any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
  - 11. Transfer of Permit. This permit may be transferred to a new owner or operator. All requests for transfer of permits shall be in writing and shall be submitted on forms provided by the Department. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of this permit.
  - 12. Certification of Construction. The Permittee may not commence disposal of waste in any new cell or phase until the Permittee has submitted to ADEM, by certified mail or hand delivery, a letter signed by both the Permittee and a professional engineer stating that the facility has been constructed in compliance with the permit. ADEM must inspect the constructed cells or phases before the owner or operator can commence waste disposal unless the Permittee is notified that ADEM will waive the inspection.
  - 13. Compliance Schedules. Reports of compliance or noncompliance with or any progress reports on interim and final requirements contained in any compliance schedule required and approved by the Department shall be submitted no later than 14 days following each schedule date.
  - 14. Other Noncompliance. The Permittee shall report all instances of noncompliance with the permit at the time monitoring reports are submitted.
  - 15. Other Information. If the Permittee becomes aware that information required by the Application was not submitted or was incorrect in the Application or in any report to the Department, the Permittee shall promptly submit such facts or information. In addition, upon request, the Permittee shall furnish to the Department, within a reasonable time, information related to compliance with the permit.
- F. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of contaminants (including leachate and explosive gases) to air, soil, groundwater, or surface water, which could threaten human health or the environment.
- G. Inspection Requirements.
- 1. The Permittee shall comply with all requirements of 335-13.
  - 2. The Permittee shall conduct random inspections of incoming loads.
  - 3. Records of all inspections shall be included in the operating record.
- H. Recordkeeping and Reporting.
- 1. The Permittee shall maintain a written operating record at the location specified in Section I.I. The operating record shall include:
    - a. Documentation of inspection and maintenance activities.

- b. Daily Volume reports.
  - c. Personnel training documents and records.
  - d. Solid/Hazardous Waste Determination Forms for Industrial Wastes, and associated ADEM disposal approval correspondence for industrial waste and special waste.
  - e. Groundwater monitoring records.
  - f. Explosive gas monitoring records.
  - g. Surface water and leachate monitoring records.
  - h. Copies of this Permit and the Application.
  - i. Copies of all variances granted by ADEM, including copies of all approvals of special operating conditions.
2. Quarterly Volume Report. Beginning with the effective date of this permit, the Permittee shall submit, within thirty (30) days after the end of each calendar quarter, a report summarizing the daily waste receipts for the previous (just ended) quarter. Copies of the quarterly reports shall be maintained in the operating record.
3. Monitoring and Corrective Action Reports. The Permittee shall submit reports on all monitoring and corrective activities conducted pursuant to the requirements of this permit, including, but not limited to, groundwater, surface water, explosive gas and leachate monitoring. The groundwater monitoring shall be conducted in March and September of each year, or as directed by ADEM, and the reports shall be submitted at least semi-annually, or as directed by ADEM. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. Explosive gas monitoring must be submitted once each year, and the reports should be submitted to ADEM and placed in the operating record within 30 days of the monitoring event. Copies of the groundwater and explosive gas monitoring reports shall be maintained in the operating record.
4. Availability, Retention, and Disposition of Records.
- a. All records, including plans, required under this permit or 335-13 must be furnished upon request, and made available at reasonable times for inspection by any officer, employee, or representative of ADEM.
  - b. All records, including plans, required under this permit or 335-13 shall be retained by the Permittee for a period of at least three years. The retention period for all records is extended automatically during the course of any unresolved enforcement action regarding the facility, or as requested by ADEM.
  - c. A copy of records of waste disposal locations and quantities must be submitted to ADEM and local land authority upon closure of the facility.
- I. Documents to be Maintained by the Permittee. The Permittee shall maintain, at the Sanders Lead Company Inc., Industrial Landfill, office the following documents and amendments, revisions and modifications to these documents until an engineer certifies closure.
- 1. Operating record.
  - 2. Closure Plan.

- J. Mailing Location. All reports, notifications, or other submissions which are required by this permit should be sent via signed mail (i.e. certified mail, express mail delivery service, etc.) or hand delivered to:
1. Mailing Address.  
Chief, Solid Waste Branch  
Alabama Department of Environmental Management  
P.O. Box 301463  
Montgomery, AL 36130-1463
  2. Physical Address.  
Chief, Solid Waste Branch  
Alabama Department of Environmental Management  
1400 Coliseum Blvd.  
Montgomery, Alabama 36110-2400
- K. Signatory Requirement. All applications, reports or information required by this permit, or otherwise submitted to ADEM, shall be signed and certified by the owner as follows:
1. If an individual, by the applicant.
  2. If a city, county, or other municipality or governmental entity, by the ranking elected official, or by a duly authorized representative of that person.
  3. If a corporation, organization, or other legal entity, by a principal executive officer, of at least the level of Vice President, or by a duly authorized representative of that person.
- L. Confidential Information. The Permittee may claim information submitted as confidential if the information is protected under Code of Alabama 1975 §§22-39-18, as amended.
- M. State Laws and Regulations. Nothing in this permit shall be construed to preclude the initiation of any legal action or to relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation.

## SECTION II. GENERAL OPERATING CONDITIONS

- A. Operation of Facility. The Permittee shall operate and maintain the disposal facility consistent with the Application, this permit, and 335-13.
- B. Open Burning. The Permittee shall not allow open burning without prior written approval from ADEM and other appropriate agencies. A burn request should be submitted in writing to ADEM outlining why that burn request should be granted. This request should include, but not be limited to, specifically what areas will be utilized, types of waste to be burned, the projected starting and completion dates for the project, and the projected days and hours of operation. The approval, if granted, shall be included in the operating record.
- C. Prevention of Unauthorized Disposal. The Permittee shall follow the approved procedures for the detecting and preventing the disposal of free liquids, regulated hazardous waste, PCB's, and medical waste at the facility.
- D. Unauthorized Discharge. The Permittee shall operate the disposal facility in such a manner that there will be no water pollution or unauthorized discharge. Any discharge from the disposal facility or practice thereof may require a National Pollutant Discharge Elimination System permit under the Alabama Water Pollution Control Act.
- E. Industrial Waste Disposal. The Permittee shall dispose of industrial waste as required by 335-13-4-.21(1)(c), and as specified in the Application.



- F. Boundary Markers. The Permittee shall ensure that the facility is identified with a sufficient number of permanent boundary markers that are at least visible from one marker to the next.

### SECTION III. SPECIFIC REQUIREMENTS FOR INDUSTRIAL LANDFILLS

A. Waste Identification and Management

1. Subject to the terms of this permit, the Permittee may dispose of the nonhazardous solid wastes listed in Section III, Paragraph B. Disposal of any other wastes is prohibited, except waste granted a temporary or one time waiver by the Director.
2. The total permitted area for the Sanders Lead Company Inc., Industrial Landfill is approximately 243 acres, with 10 acres approved for disposal.
3. The maximum average daily volume of waste disposed at the facility, as contained in the permit application, shall not exceed 200 cubic yards per day. Should the average daily volume exceed this value by 20% or 100 tons/day, whichever is less, for two (2) consecutive quarters the permittee shall be required to modify the permit in accordance with 335-13-5-.06(2)(a)5. The average daily volume shall be computed as specified by 335-13-5-.06(2)(a)5.(i).

- B. Waste Streams. The Permittee may accept for disposal non-hazardous industrial waste, construction/demolition debris, and wastewater pretreatment plant solids. Sanders Lead Company, Inc. must keep a copy of approved Solid/Hazardous Waste Determination Forms for all the Industrial Wastes disposed and any associated ADEM correspondence in the facility operating record.

- C. Service Area. The Permittee is allowed to receive for disposal waste from the Sanders Lead Company, Inc., KW Plastics, KW Plastics rail yard facility, KW Plastics Recycling Division, Wiley Sanders Truck Lines, Inc., and KW Plastics Container Facility. All located in Troy, Pike County, Alabama under common ownership.

- D. Waste Placement, Compaction, and Cover. All waste shall be confined to an area as small as possible and placed onto an appropriate slope not to exceed 2 to 1 (50%) below grade and 3 to 1 (33%) above grade. (See Section VIII.4.) All waste shall be spread in layers two feet or less in thickness and thoroughly compacted weekly with adequate landfill equipment prior to placing additional layers of waste or placing the weekly cover. The facility has been granted a variance to cover at the time of closure. (See Section VIII.2.)

- E. Liner Requirements. The Permittee shall install a composite liner system as described in the Application that meets requirements of 335-13-4-.18, and that consists of one-foot clay liner compacted to a permeability of  $1 \times 10^5$  cm/sec, overlain by a geosynthetic clay liner (GCL), a geocomposite and 12-inch sand layer. The base of the composite liner system shall be a minimum of five (5) feet above the temporal fluctuation of the groundwater table. Sanders Lead Company, Inc. is permitted to lower the disposal grades to a maximum of one-foot from the 1997 permit drawings to reflect the reduction in thickness from a two-foot liner to a one-foot liner. This should maintain the minimum 5-foot geologic buffer under the 1-foot composite clay liner. Likewise, the leachate collection sumps will be a maximum of one foot deep to maintain a 5-foot geologic buffer under the sump.

- F. Security. The Permittee shall provide artificial and/or natural barriers, which prevent entry of unauthorized vehicular traffic to the facility.

- G. All Weather Access Roads. The Permittee shall provide an all-weather access road to the dumping face that is wide enough to allow passage of collection vehicles.

- H. Adverse Weather Disposal. The Permittee shall provide for disposal activities in adverse weather conditions.

- I. Personnel. The Permittee shall maintain adequate personnel to ensure continued and smooth operation of the facility.
- J. Environmental Monitoring and Treatment Structures. The Permittee shall provide protection and proper maintenance of environmental monitoring and treatment structures.
- K. Vector Control. The Permittee shall provide for vector control as required by ADEM Admin. Code 335-13.
- L. Bulk or Noncontainerized Liquid Waste. The Permittee shall not dispose of bulk or noncontainerized liquid waste, or containers capable of holding liquids, unless the conditions of 335-13-4-.23(1)(j) are met.
- M. Empty Containers. Empty containers larger than 10 gallons in size must be rendered unsuitable for holding liquids prior to disposal in the landfill unless otherwise approved by ADEM.
- N. Other Requirements. ADEM may enhance or reduce any requirements for operating and maintaining the landfill as deemed necessary by the Land Division.
- O. Other Permits. The Permittee shall operate the landfill according to this and any other applicable permits.
- P. Scavenging and Salvaging Operations. The Permittee shall prevent scavenging and salvaging operations, except as part of a controlled recycling effort. Any recycling operation must be in accordance with plans submitted and approved by ADEM.
- Q. Signs. If the landfill is available to the public or commercial haulers, the Permittee shall provide a sign outlining instructions for use of the site. The sign shall be posted and have the information required by 335-13-4-.23(1)(f).
- R. Litter Control. The Permittee shall control litter.
- S. Fire Control. The Permittee shall provide fire control measures.

#### SECTION IV. GROUNDWATER MONITORING REQUIREMENTS

Currently groundwater monitoring is covered under ADEM Division 14 permit for this entire facility of 243 acres. Whenever Division 14 releases this facility from RCRA monitoring, the Solid Waste Branch (Division 13) regulations will come in effect for groundwater monitoring with complete groundwater-monitoring wells system. (See Section VIII.3.)

#### SECTION V. GAS MONITORING REQUIREMENTS

The Permittee must install and maintain an explosive gas monitoring system in accordance with ADEM Administrative Code, Division 13.

#### SECTION VI. LEACHATE AND SURFACE WATER MANAGEMENT REQUIREMENTS

The Permittee must collect and dispose of the leachate that is generated at the facility. The Permittee shall install a leachate collection system designed to maintain less than 12 inches (30 cm) depth of leachate over the liner. Prior to initial disposal, the Permittee shall provide the Department with a letter from the receiving publicly or privately owned treatment works, approving the acceptance of the leachate. Discharges to publicly or privately owned treatment works may be subject to the requirements of the ADEM Water Division's State Indirect Discharge (SID) Program. The Permittee shall construct and maintain run-on and run-off control structures. Surface water discharges from drainage control structures shall be permitted through the ADEM Water Division's National Pollutant Discharge Elimination System (NPDES) Program.

To facilitate leachate collection from the landfill Sanders Lead Company, Inc. is permitted to construct leachate collection sumps at approximate 150 intervals across the remaining landfill area. These changes are depicted on Sheet 6 of the revised permit drawings and details are provided on Sheet 2 of the Cell 3 Construction Plans.

#### SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

The Permittee shall close the landfill and perform post-closure care of the landfill in accordance with 335-13.

- A. Final Cover. The Permittee shall grade final soil cover such that surface water does not pond over the permitted area as specified in the Application. The final cover system shall be constructed as specified in the application. A variance is granted to the final slope from 4 to 1 (25%) to 3 to 1 (33%). (See Section VIII.1.)
- B. Vegetative Cover. The Permittee shall establish a vegetative or other appropriate cover within 90 days after completion of final grading requirements in the Application. Preparation of a vegetative cover shall include, but not be limited to, the placement of seed, fertilizer, mulch, and water.
- C. Notice of Intent. The Permittee shall place in the operating record and notify ADEM of their intent to close the landfill prior to beginning closure.
- D. Completion of Closure Activities. The Permittee must complete closure activities of each landfill unit in accordance with the Closure Plan within 180 days of the last known receipt of waste.
- E. Certification of Closure. Following closure of each unit, the Permittee must submit to ADEM a certification, signed by an engineer, verifying the closure has been completed according to the Closure Plan.
- F. Post-Closure Care Period. Post-closure care activities shall be conducted after closure of each unit throughout the life of this permit and continuing for a period of thirty (30) years following closure of the facility. ADEM may shorten or extend the post-closure care period applicable to the solid waste disposal facility. The Permittee shall reapply in order to fulfill the post-closure care requirements of this permit.
- G. Post-Closure Maintenance. The Permittee shall provide post closure maintenance of the facility to include regularly scheduled inspections. This shall include maintenance of the cover, vegetation, monitoring devices and pollution control equipment and correction of other deficiencies that may be observed by ADEM. Monitoring requirements shall continue throughout the post closure period as determined by ADEM unless all waste is removed and no unpermitted discharge to waters of the State have occurred.
- H. Post-Closure Use of Property. The Permittee shall ensure that post closure use of the property never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area.
- I. Certification of Post-Closure. Following post-closure of each unit, the Permittee must submit to ADEM a certification, signed by an engineer, verifying the post-closure has been completed according to the Post-Closure Plan.
- J. Notice in Deed to Property. The Permittee shall record a notation onto the land deed containing the property utilized for disposal within 90 days after permit expiration, revocation or when closure requirements are achieved as determined by ADEM as stated in the Application. This notation shall state that the land has been used as a solid waste disposal facility, the name of the Permittee, type of disposal activity, location of the disposal facility and beginning and closure dates of the disposal activity.
- K. Recording Instrument. The Permittee shall submit a certified copy of the recording instrument to ADEM within 120 days after permit expiration, revocation, or as directed by ADEM as described in the Application.
- L. Removal of Waste. If the Permittee, or any other person(s), wishes to remove waste, waste residues, or any liner or contaminated soils, the owner must request and receive prior approval from ADEM

### SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

1. The Permittee has been granted a variance from ADEM Rule 335-13-4-.20(2)(c)2. requiring a maximum 4 to 1 (25%) final grade for the final closure system. The maximum final grade shall be 3 to 1 (33%). (See Section VII. A.)
2. The Permittee has been granted a variance from ADEM Rule 335 –13-4-. 23 (1)(a) requiring weekly cover. The landfill is required to cover at the time of closure. (See Section III. D.)
3. The Permittee has been granted a variance from Division 13 groundwater monitoring. (See Section IV.)
4. The Permittee has been granted a variance from ADEM Rule 335 –13-4-. 23 (1)(c) requiring all waste to be confined to as small an area as possible and placed onto an appropriate slope not to exceed 4 to 1 (25%). The landfill shall operate with a maximum of 2 to 1 (50%) slopes while below grade. At which point the waste is up to grade, the landfill will be required to operate with a maximum of 3 to 1 (33%) slopes. (See Section III.D.)

Any variance granted by the Department may be terminated by the Department whenever the Department finds, after notice and opportunity for hearing, that the petitioner is in violation of any requirement, condition, schedule, limitation or any other provision of the variance, or that operation under the variance does not meet the minimum requirements established by state and federal laws and regulations or is unreasonably threatening the public health.

# **Permit Renewal Application**



May 21, 2018



Mr. Jared Kelly  
Solid Waste Branch/Land Division  
Alabama Department of  
Environmental Management  
P.O. Box 301463  
Montgomery, AL 36130-1463

**Re: Solid Waste Disposal Facility Permit No. 55-06**  
Request for Permit Renewal  
Sanders Lead Company, Inc. Industrial Landfill,  
Troy, Pike County, Alabama, Permit # 55-06

Dear Mr. Kelly;

Pursuant to *Section I. E. 2., Duty to Reapply*, of the Sanders Lead Company (SLC) Solid Waste Disposal Facility Permit, I am submitting the enclosed permit renewal application and attachments on behalf of Sanders Lead Company, Inc. As reflected within the permit renewal application, there have been no changes to the design, structures, or operations to the SLC Industrial Landfill. This request reflects Sanders intent to continue the management of the landfill facility under the previous Solid Waste Disposal Facility permit conditions.

In addition, Sanders request that all variances issued with the previous permit be continued with the renewal. Pursuant to the requirements of Chapter 8, of ADEM Admin. Code Division 335-13, Section VIII of Solid Waste Disposal Facility Permit #55-06, as issued on July 11, 2014, includes the following variances:

1. The Permittee has been granted a variance from ADEM Rule 335-13-4-.20(2)(c)2. Requiring a maximum 4 to 1 (25%) final grade for the final closure system. The maximum final grade shall be 3 to 1 (33%).
2. The Permittee has been granted a variance from ADEM Rule 335-13-4-.23(1)(a) requiring weekly cover. The landfill is required to cover at the time of closure.
3. The Permittee has been granted a variance from Division 13 groundwater monitoring.



**SANDERS LEAD CO., INC.**

4. The Permittee has been granted variance from ADEM Rule 335-13-4-.23(1)(c) requiring all waste be confined to as small an area as possible and placed onto an appropriate slope not to exceed 4 to 1 (25%). The landfill shall operate with a maximum of 2 to 1 (50%) slopes while below grade. At which point the waste is up to grade, the landfill will be required to operate with a maximum of 3 to 1 (33%) slopes.

In accordance with ADEM Admin. Code Rule 335-13-8-.03(1), Sanders Lead Company, Inc., requests the above-referenced prior and existing variances be granted as part of this permit renewal. Further, Sanders requests that the record, opinion and order made pursuant to ADEM Admin. Code Rule 335-13-8-.02, for each of these prior and existing variances previously approved by the Department, be incorporated into this petition for extension.

Sanders Lead Company, Inc. appreciates your time and consideration in reviewing this request for renewal. Attached with this submittal are the Solid Waste Permit Application and a check in the amount of \$4,075.00. Should you have any questions regarding this project please contact me at (334) 566-1563.

Sincerely;



Chris Rutherford, P.G.  
Geologist  
Environmental Affairs

# SOLID WASTE APPLICATION

PERMIT APPLICATION  
SOLID WASTE DISPOSAL FACILITY  
ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
(Submit in Triplicate)

1. Facility type:  Municipal Solid Waste Landfill (MSWLF)  
 Industrial Landfill (ILF)  
 Other (explain) \_\_\_\_\_

2. Facility Name Sanders Lead Company, Inc.

3. Applicant:

Name: Sanders Lead Company, Inc.

Address: P.O. Drawer 707, Troy, Alabama 36081

1 Sanders Road, Troy, Alabama 36079

Telephone: 334-566-1563

4. Location: (include county highway map or USGS map)

Township 9 North Range 21 East  
Section 5 & 6 County Pike

5. Land Owner:

Name: Sanders Lead Company, Inc.

Address: P.O. Drawer 707, Troy, Alabama 36081

Telephone: 334-566-1563

(Attach copy of agreement from landowner if applicable.)

November 1997



**Solid Waste Permit Application**  
**Page 2**

**6. Contact Person:**

**Name** Chris Rutherford

**Position or Affiliation** Geologist, Environmental Affairs

**Address:** P.O. Drawer 707, Troy, Alabama 36081

**Telephone:** 334-566-1563; chris-rutherford@sanderslead.com

**7. Size of Facility:** 243 **Acres**      **Size of Disposal Area(s):** 10 **Acres**

**8. Identify proposed service area or specific industry that waste will be received from:**

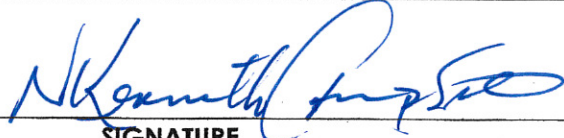
Sanders Lead Company, Inc.; KW Plastics; KW Plastics Railyard facility;  
KW Plastics Recycling Division; Wiley Sanders Truck Lines, Inc.; and  
KW Plastics Container facility.  
All facilities located in Troy, Pike County, Alabama under common ownership and contiguously located

**9. Proposed maximum average daily volume to be received at landfill (choose one):**

                     **Tons/Day**      200 **Cubic Yards/Day**

**10. List all waste streams to be accepted at the facility (i.e., household solid waste, wood boiler ash, tires, trees, limbs, stumps, etc.):**

Non-hazardous filtercake ( 60 yds/day); Non-hazardous treated slag ( 50 yds/day); C & D debris ( up to 25 yds/day)  
WWTP Solids ( up to 25 yds/day) and Non-recyclable plastic industrial waste ( up to 25 yds/day)

      5-21-18  
**SIGNATURE**      **DATE**





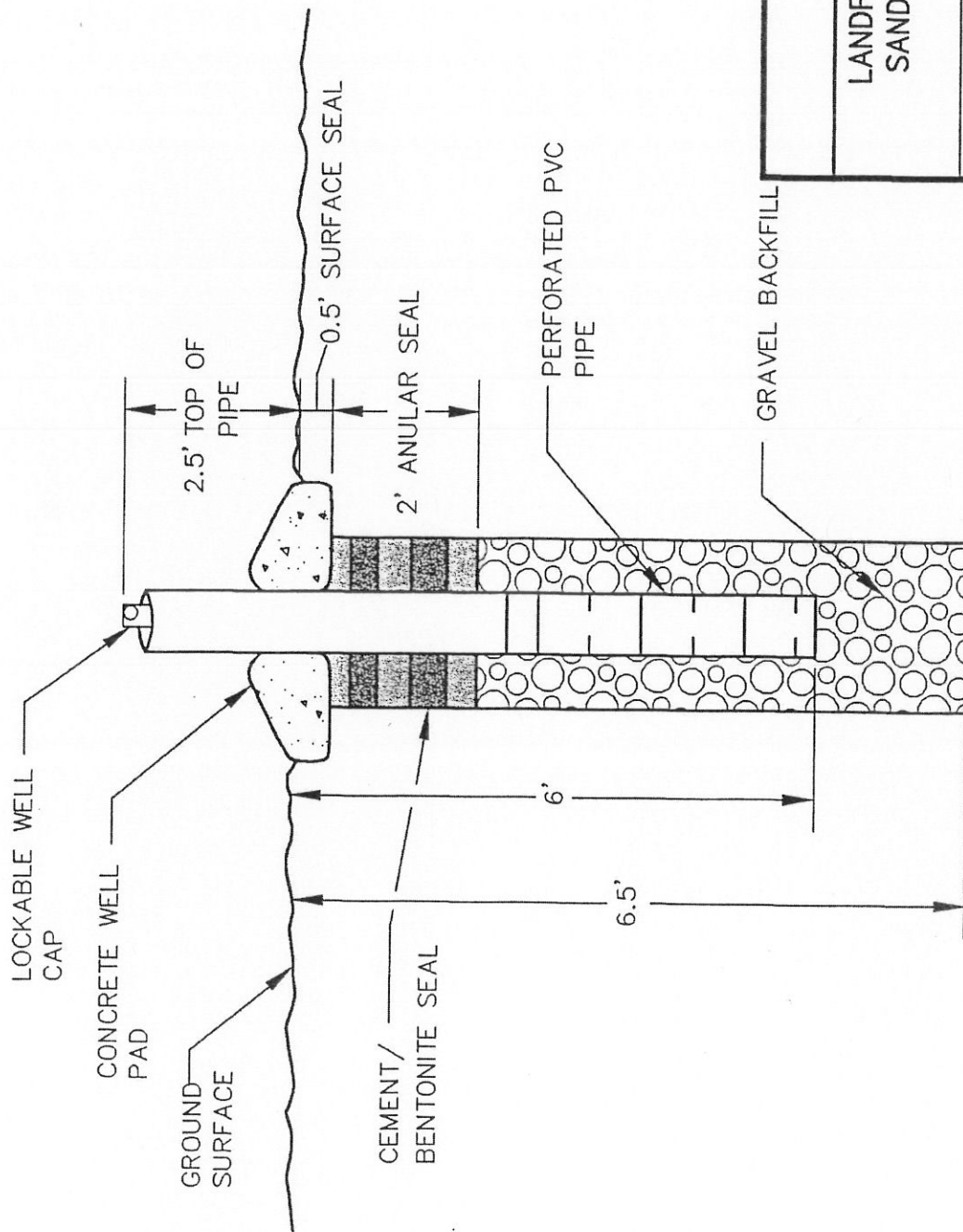


FIGURE 1

LANDFILL GAS MONITORING WELL  
 SANDERS LEAD COMPANY, INC.  
 TROY, ALABAMA

SCALE: NOT TO SCALE      DR: KWB      CHK: JAF      REV:

PREPARED BY:



ENVIRONMENTAL CONSULTANTS, INC.  
 Suite 200, 207 Donelson Pike, Nashville, TN 37214  
 615-889-6888 fax 615-889-4004

PROJ: 96-SAN02-01      DATE: 10/29/01      SHEET 1 OF 1

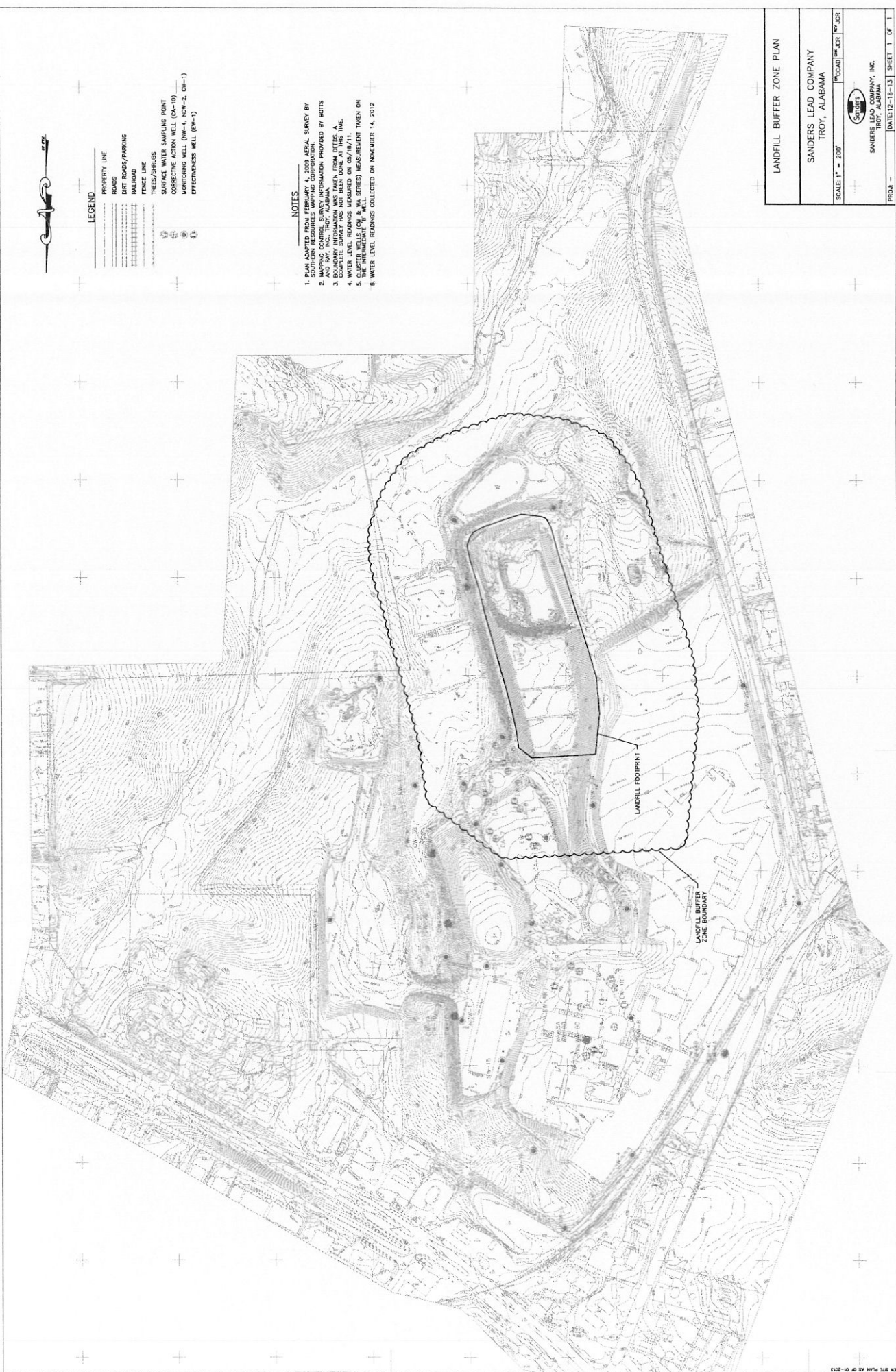


**LEGEND**

- PROPERTY LINE
- ASPHALT ROADS/PARKING
- GRAVEL ROADS/PARKING
- RAILROAD
- FENCE LINE
- TREES/SHRUBS
- SURFACE WATER SAMPLING POINT
- CORRECTIVE ACTION WELL (CA-10)
- MONITORING WELL (MW-4, MW-2, CW-1)
- EFFECTIVENESS WELL (EW-1)

**NOTES**

1. PLAN ADAPTED FROM FEBRUARY 4, 2008 AERIAL SURVEY BY SANDERS LEAD COMPANY.
2. MONITORING WELL INFORMATION PROVIDED BY BOTS AND BVA, INC., TROY, ALABAMA.
3. CORRECTIVE ACTION WELL CA-10 AND MONITORING WELL MW-4 AND MW-2 INFORMATION PROVIDED BY BOTS AND BVA, INC., TROY, ALABAMA.
4. WATER LEVEL READINGS MEASURED ON 05/18/11.
5. CLUSTER WELLS (CW-1, CW-2) MEASUREMENT TAKEN ON 05/18/11.
6. WATER LEVEL READINGS COLLECTED ON NOVEMBER 14, 2012.



LANDFILL BUFFER ZONE PLAN	
SANDERS LEAD COMPANY TROY, ALABAMA	
SCALE: 1" = 200'	ROADS: [Symbol] [Symbol] [Symbol] [Symbol]
SANDERS LEAD COMPANY, INC. TROY, ALABAMA	
PROJECT: 12-18-13	DATE: 12-18-13   SHEET 1 OF 1

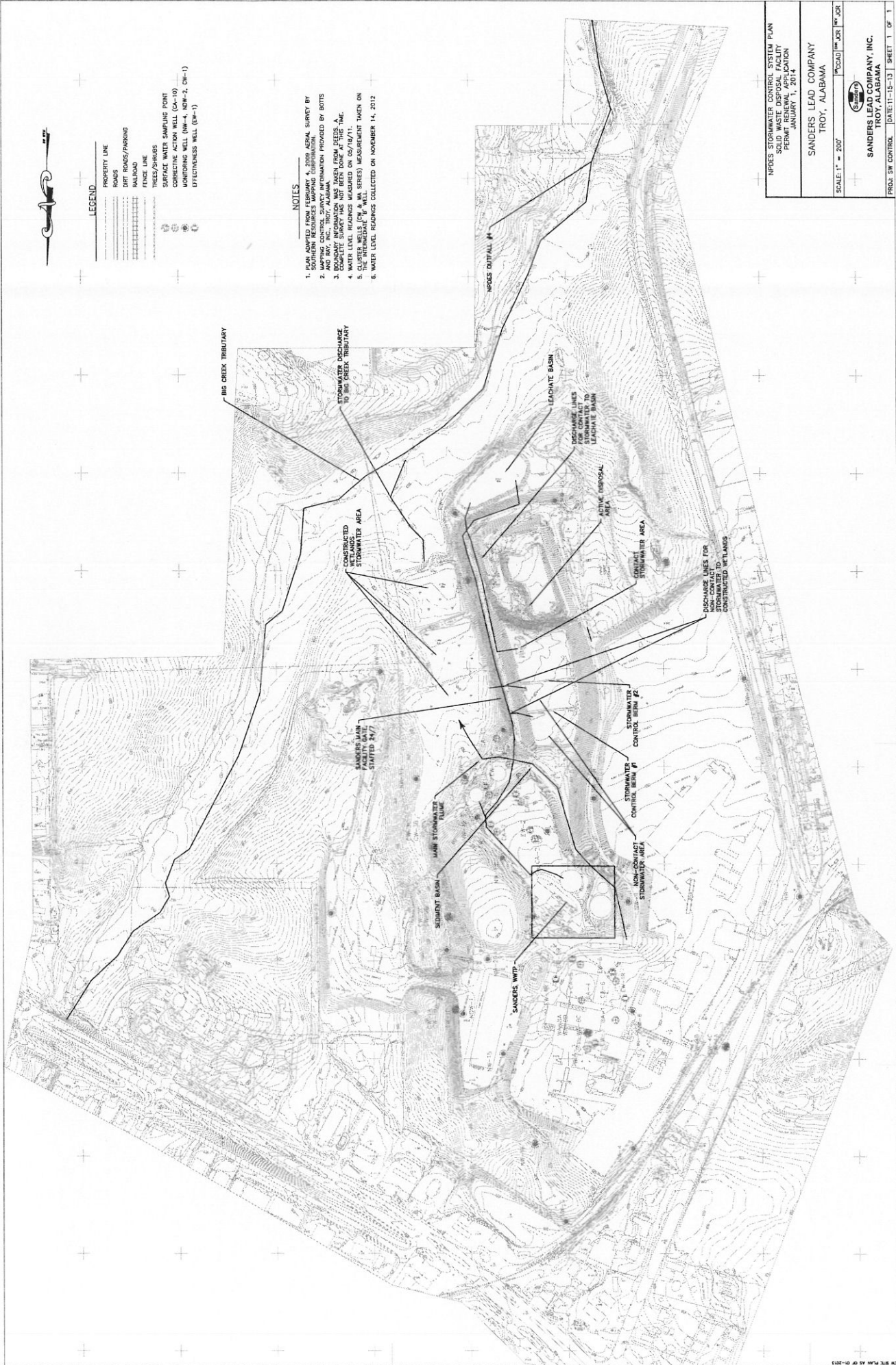


**LEGEND**

- PROPERTY LINE
- ROADS
- DRIVEWAYS/PARKING
- RAILROAD
- CEMENT DRIVEWAYS
- FENCE LINE
- TREES/SHRUBS
- SURFACE WATER SAMPLING POINT
- CORRECTIVE ACTION WELL (CA-10)
- MONITORING WELL (MW-4, MW-2, MW-1)
- EFFECTIVENESS WELL (EW-1)

**NOTES**

1. PLAN ADAPTED FROM FEBRUARY 4, 2009 AERIAL SURVEY BY SOUTHERN RESOURCES MAPPING CORPORATION.
2. ALL ELEVATIONS UNLESS OTHERWISE NOTED ARE IN FEET AND INCHES, TROY, ALABAMA.
3. CONCRETE DRIVEWAYS NOT SHOWN AT THIS SCALE.
4. WATER LEVEL READINGS MEASURED ON 05/18/11.
5. CLUSTER WELLS (CW, MW, SERIES) MEASUREMENT TAKEN ON 05/18/11.
6. WATER LEVEL READINGS COLLECTED ON NOVEMBER 14, 2012.



NPDES STORMWATER CONTROL SYSTEM PLAN  
 SOLID WASTE DISPOSAL FACILITY  
 PERMIT RENEWAL APPLICATION  
 JANUARY 1, 2014  
 SANDERS LEAD COMPANY  
 TROY, ALABAMA

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SCALE: 1" = 200'  
 PROJECT: SW CONTROL | DATE: 11-15-13 | SHEET 1 OF 1



### 3.0 SOLID WASTE MANAGEMENT - WASTE SCREENING PROCESS

Currently there are five waste streams permitted for disposal at the Sanders facility. There is no commercial disposal or disposal from the general public allowed. There are two primary waste managed on a daily basis at the Sanders Industrial Landfill (treated slag and WWTP filtercake), and three additional waste streams (C&D debris, KWR WWTP solids, and non-recyclable plastic industrial waste) approved for disposal on an intermittent or emergency basis. The service area for the Sanders Industrial Landfill will remain as Sanders Lead Company, Inc. KW Plastics, KW Plastics Recycling Division, KW Container, and Wiley Sanders Truck Lines. All located in Troy, Pike County, Alabama and all under common ownership. A description of the waste materials and service area is presented below in Table 3-1.

<b>Table 3-1 Sanders Industrial Landfill, Permit #55-06 Solid Waste Streams</b>			
<b>Waste Stream</b>	<b>Estimated Volume</b>	<b>Frequency</b>	<b>Service Area</b>
<b>Treated Slag</b>	<b>50 yds/day</b>	<b>Daily</b>	<b>Sanders Lead Company, Inc.</b>
<b>WWTP Filtercake</b>	<b>60 yds/day</b>	<b>Daily</b>	<b>Sanders Lead Company, Inc.</b>
<b>KWR WWTP Solids</b>	<b>20 yds/day</b>	<b>As needed</b>	<b>KW Plastics Recycling Division</b>
<b>C/D Debris</b>	<b>15 yds/day</b>	<b>As needed</b>	<b>Sanders Lead Company, Inc. KW Plastics Recycling Division KW Plastics KW Container Wiley Sanders Truck Lines</b>
<b>Non-recyclable plastic industrial waste</b>	<b>25 yds/day</b>	<b>As needed</b>	<b>Sanders Lead Company, Inc. KW Plastics Recycling Division KW Plastics KW Container</b>



Slag, the waste product from the smelting process, is hazardous upon generation due to its Toxicity Characteristic Leachate Procedure (TCLP). The material is crushed and treated in a slag processing area per Sanders RCRA Part B permit. The treatment process renders the slag non-hazardous in a pozzolonic (solidification/stabilization) process at the treatment unit building. From the treatment unit, the treated slag is loaded directly onto dump trucks and tested on-site for disposal approval. Each load of treated slag is tested at the Sanders Lead laboratory for TCLP lead and cadmium and the results recorded as part of the Sanders Industrial Landfill Operating Record. At a minimum, once every two years a sample of treated slag is submitted to an independent laboratory for TCLP analysis of the eight RCRA metals. Once successfully treated and laboratory tested, the trucks managing the treated slag are used to transport the material to the Sanders Industrial Landfill.

Stormwater, process wastewater, and spent battery electrolyte are transferred from the Sanders smelting operation via gravity flow to the on-site Wastewater Treatment Plant (WWTP). At the WWTP these fluids are treated on a batch basis through neutralization, flocculation, sedimentation, and filtration to remove metal constituents and other contaminants. The solid residue collected from the filtration operations, referred to as filtercake, is loaded directly onto dump trucks and tested on-site for disposal approval. Each load of WWTP filtercake is tested at the Sanders Lead laboratory for TCLP lead and cadmium and the results recorded as part of the Sanders Industrial Landfill Operating Record. At a minimum, once every two years a sample of WWTP filtercake is submitted to an independent laboratory for TCLP analysis of the eight RCRA metals. Once successfully tested, the dump trucks containing the filtercake are used to transport the material to the Sanders Industrial Landfill.

On an intermittent basis, the Sanders Industrial Landfill may receive additional waste from Sanders Lead Company, KW Plastics, KW Plastics Recycling Division, KW Container, or

Wiley Sanders Truck Lines, companies under common ownership and contiguously located adjacent to the Sanders operations in Troy, Pike County, Alabama.

As part of the Sanders operations, construction and demolition activities are continuously on-going as well as the generation of wood, lumber, cardboard, and plastic shipping containers from incoming shipments of materials. These construction activities can occur at any of the Sanders/KW facilities in Troy, Alabama. The C/D waste is routinely disposed at the local C/D landfill (Pike Landfill) in Troy, Alabama. Generated concrete rubble is inspected and pressure cleaned of any hazardous residue at Sanders and utilized on-site for erosion concrete and backfill material. At a minimum, once every two years a sample of Sanders C/D waste is submitted to an independent laboratory for TCLP analysis of the eight RCRA metals. However, on occasion some C/D waste may be disposed in the Sanders Industrial Landfill in an emergency situation. Examples of such situations would include issues with offsite disposal facilities, storm event clean-up, transportation difficulties, and closure of backfill and erosion control areas, etc.

KW Plastics Recycling Division is a related facility that operates a post-consumer plastic recycling operation contiguous to the Sanders Lead Company property. Wastewater from their plastic recycling lines is treated in KWR's Wastewater Treatment Plant and generated solids are loaded onto roll off containers and dump trucks for disposal at a local municipal solid waste landfill. At a minimum, once every two years a sample of KWR WWTP solids is submitted to an independent laboratory for a full Appendix 9 constituent parameters. As with the other intermittent waste streams, on occasion some KWR WWTP solids may be disposed in the Sanders Industrial Landfill in an emergency situation. Examples of such situations would typically include issues with offsite disposal facilities.

Non-recyclable plastic industrial waste is routinely generated at the Sanders and KW facilities on a daily basis. During the course of recycling activities, various grades of plastic can be intermixed within the incoming plastic scrap. The KW recycling processes remove these non-compatible grades of plastic from the final product and segregate them for off-

site disposal. Examples of non-recyclable plastic associated with incoming scrap with its corresponding recycling codes include #1 PET (i.e. soda bottles) ,#3 PVC (i.e. film and liners), #4 LDPE (i.e. film), #6 PS (i.e. semi-rigid containers), and #7 mixed other plastics. Also included within this waste stream could be shipping and transportation materials such as shrink wrap, plastic strapping, and clean plastic containers. Currently these materials are loaded onto roll-off containers for disposal at a local municipal solid waste landfill. At a minimum, once every two years a sample of non-recyclable plastic industrial waste is submitted to an independent laboratory. Waste streams from KWR are analyzed for a full Appendix 9 constituent parameters; samples from all other Sanders/KW facilities are TCLP analysis of the eight RCRA metals. As with the other intermittent waste streams, some non-recyclable plastic industrial waste may be disposed in the Sanders Industrial Landfill in an emergency situation. Examples of such situations would typically include issues with offsite disposal facilities.

In total, the proposed maximum average daily volume to be received at the Sanders Industrial Landfill is 200 cubic yards per day. All waste streams are characterized as inert, compatible, non-reactive, and non-ignitable. Each waste stream is properly profiled with ADEM's Solid Waste Disposal Approvals using Form 300 as required. Provisions for the segregation of waste are not necessary. PCB nor medical wastes are generated at any Sanders or KW facility, so there is no provisions for these waste streams at the Sanders Industrial Landfill.

On a daily basis, staff from the Sanders Environmental Affairs Department inspect the Sanders Industrial landfill for general operating conditions as well as a random inspection on a load of disposed waste. The random inspection specifically looks for regulated hazardous waste, free liquids, or any other issue or condition that may affect the Sanders Industrial Landfill. The daily random Inspection is recorded in the Sanders Industrial Landfill Operating Record.



November 29, 2018

Mr. Eric Sanderson, Chief  
Solid Waste Branch  
Land Division  
Alabama Department of Environmental Management  
Post Office Box 301463  
Montgomery, AL 36130-1463



Dear Mr. Sanderson:

**RE: Addition to Approved Waste Stream  
Solid Waste Permit No. 55-06**

This letter is to amend the permit renewal application for Solid Waste Disposal Facility Permit No. 55-06 submitted by Sanders Lead Company, Inc. (Sanders), so as to include a new non-hazardous waste stream to be generated at our Troy facility. Specifically, this waste stream will be generated by a new, air emissions control scrubber currently being constructed at our facility. This air pollution control system is anticipated to be completed and become operational in the fall of 2019. Once operational, this new scrubber process will take hot flue emissions, water vapor, and anhydrous ammonia gas to produce ammonium sulfate (AS), to be sold as fertilizer. Storage of the AS fertilizer will be on site in one of four 60' stainless steel silos.

As with any loading and unloading operations, the potential for small scale spillage of the AS exists. It would be from this spillage and the associated material handling and clean-up processes whereby this proposed waste stream for disposal would be generated. Since the AS is to be sold by Sanders as a product, it is in our economic interest to minimize to the greatest extent possible any of this material that would be disposed in our Industrial Landfill

Based on our review of the attached Safety Data Sheet, it does not appear that this material would be classified as a listed hazardous waste nor is it expected that it would be a characteristic hazardous waste. Under separate cover, Sanders will be submitting an ADEM Form 300 Solid Waste Profile for "Waste Ammonium Sulfate" to the Industrial Hazardous Waste Branch.



**SANDERS LEAD CO., INC.**

However, inasmuch as our Solid Waste Permit renewal application was currently under review, we believed it to be prudent to amend said application to request the addition of this material to our approved disposal waste stream.

Sanders Lead Company greatly appreciates the Department's consideration of this matter. Should you have any questions concerning this matter, please feel free to contact me at (334) 566-1563 or via e-mail at [chris-rutherford@sanderslead.com](mailto:chris-rutherford@sanderslead.com).

Sincerely,



Chris Rutherford, P.G.  
Geologist  
Environmental Affairs

cc: Highland Technical Services, Inc. (via e-mail)

## FEE SHEET FOR SOLID WASTE PERMITS

ADEM No.: 10755

Applicant: Sanders Lead Company, Inc.

Location: 100 Sanders Road  
Troy, Pike County, AL

Coordinates 31.78738366, -85.9796028

Permit No.: 55-06

Date Application Received: 05/22/18

Permit Fees Required	Initial Issuance	Modification	Reissuance	Total
Municipal Solid Waste Landfill	\$83,880		\$18,635	
Minor Modification <sup>1</sup>		\$3,275		
Major Modification <sup>2</sup>		\$32,615		
Construction/Demolition Landfill	\$7,145		\$2,700	
Minor Modification <sup>1</sup>		\$1,460		
Major Modification <sup>2</sup>		\$2,915		
Industrial Landfill	\$12,670		\$4,075	\$4,075
Minor Modification <sup>1</sup>		\$1,460		
Major Modification <sup>2</sup>		\$4,375		
Compost Facility	\$4,860		\$1,835	
Minor Modification <sup>1</sup>		\$1,225		
Major Modification <sup>2</sup>		\$1,945		
Environmental Covenants				
Engineering Controls	\$6,425	\$1,610		
Registry Fee for Class 1 Controls	\$13,705	\$635		
Registry Fee for Class 2 Controls	\$9,420	\$635		
Registry Fee for Class 3 Controls	\$5,245	\$635		

Additional Fees				
Geological Review:	\$4,865	\$3,275	\$3,275	
Greenfield Site:	\$1,610			
Public Hearing:	\$8,450	\$8,450	\$8,450	
Name Change/Transfer:		\$800		
Variance Request	\$1,460	\$1,460	\$1,460	
Solid Waste Disposal Notification	\$215	\$215	\$215	

<sup>1</sup> These are modifications as included in ADEM Admin. Code Rule 335-13-5-.06(2)

<sup>2</sup> These are modifications as included in ADEM Admin. Code Rule 335-13-5-.06(1)

**RECEIVED**

**MAY 23 2018**

**ADEM  
EDDS**

Total Fee Due:

Amount Submitted with Application:

Amount Received:

Amount to be Billed:

Amount Received: #70615

Date Received:

Amount to be Refunded:

\$4,075
\$4,075
\$4,075
\$0
<u>CB 4,075</u>
<u>05/23/18</u>

Fee Schedule Prepared by: JDK

Date: 5/23/18

Fee Schedule Reviewed by: SSS

Date: 5/23/18