

PRELIMINARY DETERMINATION

PERMIT RENEWAL AND MINOR MODIFICATION

Tyler Union, a Division of McWane, Inc.

1501 W. 17th Street
Anniston, AL 36201

Reeves Road Landfill
Permit No. 08-17

????

Tyler Union, a Division of McWane, Inc. has submitted to the Alabama Department of Environmental Management (ADEM) an application to continue to operate and modify an industrial landfill known as the Reeves Road Landfill. The modification would change the design of the final closure cap. The waste stream for the Reeves Road Landfill would remain nonhazardous industrial wastes including green sand, no-bake sand, no-bake core butts, shell core butts, desulfurization slag, cupola slag, quencher drop-out, baghouse dust, used cement residue, plant-generated rubbish, and cupola and ductile treatment baghouse dust which has been stabilized in line. The service area for the Reeves Road Landfill would remain Union Foundry Company located in Anniston, Alabama. The maximum average daily volume of waste disposed at the Reeves Road Landfill would remain 300 ton per day.

The Reeves Road Landfill is described as being located in the Northeast ¼ of the Southwest ¼ of Section 35, Township 15 South, Range 7 East in Calhoun County, Alabama. The Reeves Road Landfill consists of 75 acres with 3.4 acres for disposal operations.

The Land Division has determined that the renewal and minor modification of the permit would meet the applicable requirements of ADEM's Administrative Code Division 13.

Technical Contact:

John Sturdivant
Solid Waste Engineering Section
Land Division
(334) 270-5607



ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

SOLID WASTE DISPOSAL FACILITY PERMIT

PERMITTEE: Tyler Union, a Division of McWane, Inc.

FACILITY NAME: Reeves Road Landfill

FACILITY LOCATION: Northeast ¼ of the Southwest ¼ of Section 35, Township 15 South, Range 7 East in Calhoun County, Alabama. The facility consists of approximately 75 acres with 3.4 acres approved for disposal.

PERMIT NUMBER: 08-17

PERMIT TYPE: Industrial Landfill

WASTE APPROVED FOR DISPOSAL: Nonhazardous industrial wastes including green sand, no-bake sand, no-bake core butts, shell core butts, desulfurization slag, cupola slag, quencher drop-out, baghouse dust, used cement residue, plant-generated rubbish, and cupola and ductile treatment baghouse dust which has been stabilized in line.

APPROVED WASTE VOLUME: Average Daily Volume of 300 tons per day

APPROVED SERVICE AREA: Tyler Union, a Division of McWane, Inc. located in Anniston, Alabama

In accordance with and subject to the provisions of the Solid Wastes & Recyclable Materials Management Act, as amended, Code of Alabama 1975, § 22-27-1 to 22-27-27 ("SWRMMA"), the Alabama Environmental Management Act, as amended, Code of Alabama 1975, § 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: **?????**

EFFECTIVE DATE: **?????**

EXPIRATION DATE: **?????**

Alabama Department of Environmental Management

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

Permittee: Tyler Union, a Division of McWane, Inc.
1501 W. 17th Street
Anniston, Alabama 36201

Landfill Name: Reeves Road Landfill

Landfill Location: Northeast ¼ of the Southwest ¼ of Section 35, Township 15 South, Range 7 East
Calhoun County

Permit Number: 08-17

Landfill Type: Industrial

Pursuant to the Solid Wastes & Recyclable Materials Management Act, Code of Alabama 1975, Section 22-27-1, *et seq.*, as amended, and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM), this permit is issued to Tyler Union, a Division of McWane, Inc. (hereinafter called the Permittee), to operate a solid waste disposal facility, known as the Reeves Road 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 335-13-16 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 in the permit application dated December 27, 2019 and as amended for permit renewal (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 **?????** and shall remain in effect until **?????** unless suspended or revoked.

Alabama Department of Environmental Management

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 Admin. Code Div. 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 Admin. 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.,E.,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 attached hereto 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.,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 the Department, 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.

The Department must inspect the constructed cells or phases before the owner or operator can commence waste disposal unless the Permittee is notified that the Department 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 ADEM Admin. Code Division 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. **Monitoring is subject to applicable conditions of Section VI. of the permit.**
 - h. Copies of this Permit and the Application.

- i. Copies of all variances granted by the Department, 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 the Department, and the reports shall be submitted at least semi-annually, or as directed by the Department. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. Explosive gas monitoring must be submitted on a quarterly basis, and the reports should be submitted to the department 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 Division 13 must be furnished upon request, and made available at reasonable times for inspection by any officer, employee, or representative of the Department.
- b. All records, including plans, required under this permit or Division 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 the Department.
- c. A copy of records of waste disposal locations and quantities must be submitted to the Department and local land authority upon closure of the facility.

I. Documents to be Maintained by the Permittee

The Permittee shall maintain, at the Tyler Union, a Division of McWane, Inc. Company Office (1501 W. 17th Street, Anniston, AL), the following documents and amendments, revisions and modifications to these documents until an engineer certifies closure of the permitted landfill.

- 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:

Mailing Address.
Chief, Solid Waste Branch, Land Division
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130-1463

Physical Address.
Chief, Solid Waste Branch, Land Division
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 the Department, 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 ADEM Admin. Code Division 13.

B. Open Burning

The Permittee shall not allow open burning without prior written approval from the Department and other appropriate agencies. A burn request should be submitted in writing to the Department 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 ADEM Admin. Code 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 WASTE 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 III.,B. Disposal of any other wastes is prohibited, except waste granted a temporary or one time waiver by the Director.
2. The total permitted facility area for the Reeves Road Landfill is approximately 75 acres with 3.4 acres approved for disposal.
3. The maximum average daily volume of waste disposed at the facility shall not exceed 300 tons per day, except as provided under Rule 335-13-5-.06(2)(a)5. The average daily volume shall be computed as specified by Rule 335-13-5-.06(2)(a)5.(i).

B. Waste Streams

The Permittee may accept for disposal non-hazardous industrial waste including green sand, no-bake sand, no-bake core butts, shell core butts, desulfurization slag, cupola slag, quencher drop-out, baghouse dust, used cement residue, plant-generated rubbish, and cupola and ductile treatment baghouse dust which has been stabilized in line.

C. Service Area:

The Permittee is allowed to accept waste for disposal from Tyler Union, a Division of McWane, Inc. located in Anniston, Alabama.

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 3 to 1 (33%) (See Section VIII., 2.). 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. A minimum of six inches of compacted earth or other alternative cover material approved by the Department shall be added at the conclusion of each week's operation.

E. Liner Requirements

The Permittee shall install a liner system as described in the permit application. The base of the waste shall be a minimum of five (5) feet above the highest measurement of the groundwater table.

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 Division 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 Rule 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 the Department.

N. Other Requirements

The Department 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 the Department.

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 Rule 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.

A. The Permittee shall install and/or maintain a groundwater monitoring system, as specified below.

1. The permittee shall maintain the groundwater monitoring wells and piezometers identified in Table 1 at the locations specified in the Application, and any other groundwater monitoring wells which are added during the active life and the post closure care period.
2. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to address changes in the rate and extent of a plume of contamination or as otherwise deemed necessary to maintain compliance with the 335-13.
3. Prior to installing additional groundwater monitoring wells, the Permittee shall submit a report to ADEM with a permit modification request specifying the design, location and installation of additional monitoring wells. This report shall be submitted within ninety (90) days prior to the installation which, at a minimum, shall include.
 - a. Well construction techniques including proposed casing depths, proposed total depth, and proposed screened interval of well(s);
 - b. Well development method(s);
 - c. A complete analysis of well construction materials;
 - d. A schedule of implementation for construction; and
 - e. Provisions for determining the lithologic characteristics, hydraulic conductivity and grain-size distribution for the applicable aquifer unit(s) at the location of the new well(s).

B. Groundwater Monitoring Requirements.

1. The Permittee shall determine the groundwater surface elevation at each monitoring well and piezometer identified in Table 1 each time the well or piezometer is sampled and at least semi-annually throughout the active life and post-closure care period.
2. The Permittee shall determine the groundwater flow rate and direction in the first zone of saturation at least annually or each time groundwater is sampled and submit as required by 335-13.
3. Prior to the initial receipt of waste at the facility, the Permittee shall sample, and analyze for the parameters listed in Appendix I of 335-13-4-.27, in all monitoring wells identified in Section IV.A.2. to establish background water quality and/or as directed by 335-13-4-.27(2)(j) and 335-13-4-.27(2)(a)(1). The records and results of this sampling and analysis activity shall be submitted to ADEM, within sixty (60) days of the date of sampling.
4. The Permittee shall sample, and analyze all monitoring wells identified in Table 1 for the parameters listed in Appendix I of 335-13-4-.27(3), on a semi-annual basis throughout the active life of the facility and the post-closure care period in accordance with 335-13-4-.27(3). Sampling shall be conducted during March and September of each year, beginning with the effective date of this permit.

5. In addition to the requirements of Sections IV., B.1., B.2., B.3. and B.4., the Permittee shall record water levels, mean sea level elevation measuring point, depth to water, and the results of field tests for pH and specific conductance at the time of sampling for each well.
- C. Sampling and Analysis Procedures. The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Section IV.A. to provide a reliable indication of the quality of the groundwater.
1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in the Application. Monitoring wells shall be bailed or pumped to remove at least four times the well volume of water. Slow recharge wells shall be bailed until dry. Wells shall be allowed to recharge prior to sampling. The Permittee may use the low-flow method for groundwater sampling as described in the application. See Section XI.3.)
 2. Samples shall be analyzed according to the procedures specified of the Application, 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), or other appropriate methods approved by this Department. All field tests must be conducted using approved EPA test kits and procedures.
 3. Samples shall be tracked and controlled using the chain-of-custody and QA/QC procedures specified of the Application.
- D. Recordkeeping and Reporting Requirements.
1. Recording of Results. For each sample and/or measurement taken pursuant to the requirements of this permit, the Permittee shall record the information required by Section I.E.9.c.
 2. Recordkeeping. Records and results of all groundwater monitoring, sampling, and analysis activities conducted pursuant to the requirements of this permit shall be included in the operating record required by Section I.I.1.
- E. Permit Modification. If the Permittee or ADEM determines that the groundwater monitoring system no longer satisfies the requirements of 335-13-4-.14 or Section IV.A. of this permit, the Permittee must, within 90 days, submit an application for a permit modification to make necessary and/or appropriate changes to the system.

TABLE 1
GROUNDWATER MONITORING WELLS

Monitoring Well Number	Top of Casing (feet msl)	Part Monitoring
UPGRADIENT/BACKGROUND MONITORING WELLS		
MW-2	825.50	Entire Landfill
MW-3	836.18	Entire Landfill
DOWNGRAIDENT MONITORING WELLS		
MW-4	870.40	Entire Landfill
MW-5	865.22	Entire Landfill
MW-6	854.09	Entire Landfill

SECTION V. GAS MONITORING REQUIREMENTS

At this time, the Permittee is not required to conduct gas monitoring or install a gas collection system. If the Department determines that monitoring and/or a system is necessary, the Permittee shall submit a proposed plan that would meet the Division 13 regulations (See Section VIII., 1.)

SECTION VI. LEACHATE AND SURFACE WATER MANAGEMENT REQUIREMENTS

The Permittee must collect and dispose of the leachate that is generated at the facility as described in the Facility Operation Plan of the Application. The Permittee shall install a leachate collection system designed to maintain less than 12 inches (30 cm) depth of leachate over the liner. The Permittee may dispose of the leachate by discharging the leachate to run-on and run-off control structures or by discharging to a publicly or privately owned treatment works. Surface water discharges from drainage control structures shall be permitted through the ADEM Water Division's National Pollutant Discharge Elimination System (NPDES) Program. Prior to initial disposal of leachate to a treatment works, 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.

SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

The Permittee shall close the landfill and perform post-closure care of the landfill in accordance with Division 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 Permittee has been granted a variance for 3 to 1 (33%) slopes for the final cover (See Section VIII, 2.). All other requirements for the final cover system shall comply with ADEM Admin. Code Division 13.

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 the Department 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 the Department 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. The Department 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 the Department 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 the Department 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 the Department 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 the Department within 120 days after permit expiration, revocation, or as directed by the Department 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 the Department.

SECTION VIII. VARIANCES

1. A variance is granted from ADEM Rule 335-13-4-.16 exempting gas monitoring at the Reeves Road Landfill (See Section V).
2. A variance is granted from ADEM Rule 335-13-4-.23(1)(c) requiring 4 to 1 slopes on working face and final closure. The Reeves Road Landfill is required to maintain a 3 to 1 slope on working face and final closure (See Section III., D. and Section VII., A.).

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 and Minor Modification Application



June 18, 2020

Mr. Hunter Baker
ADEM – Solid Waste Engineering Section
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Re: Reeves Road Landfill Minor Modification Closure Request
& Intent to Close
Tyler Union
Anniston, Alabama
Permit Number 08-17

Dear Mr. Baker:

Tyler Union requests a minor modification to the closure specifications for Reeves Road Landfill Permit #08-17. As originally depicted in Drawing No. 8.1 of the closure specification drawings dated 03/04/2010, we specified that the final cover system would consist of 12 inches of clean green sand above the geosynthetic clay liner (GCL) and then 12 inches of vegetative soil cover above the clean green sand. Now, we are requesting that we place 18 inches of vegetative cover above the GCL and seed the vegetative cover to complete the final cover system. This modification also revises the Operational Plan (Pages 7.1, C.4.1 and C.7.1).

This letter also serves as our notification of intent to close the permitted portion of the landfill.

Enclosed you will find a drawing showing the original and modified final cover system. Also a check of \$1,460.00 is enclosed for the minor modification fee.

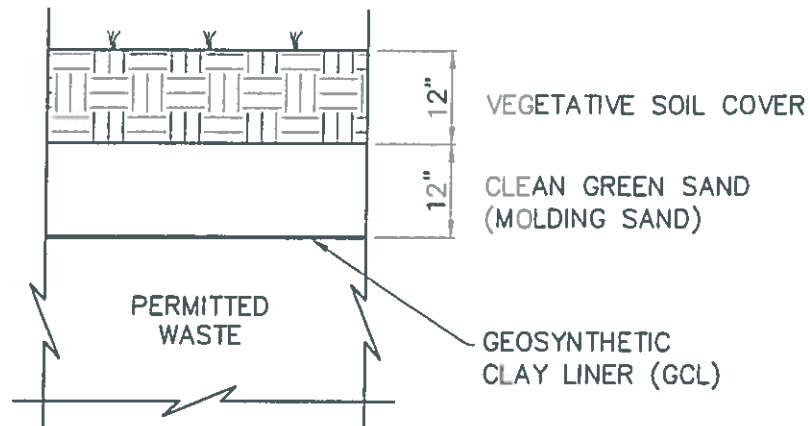
Should you have any question, please do not hesitate to call Tom Bell with Tyler Union at 256-240-4280.

Respectfully,

Tom Bell
Environmental Manager

Steve Johnson
Assist. General Manager

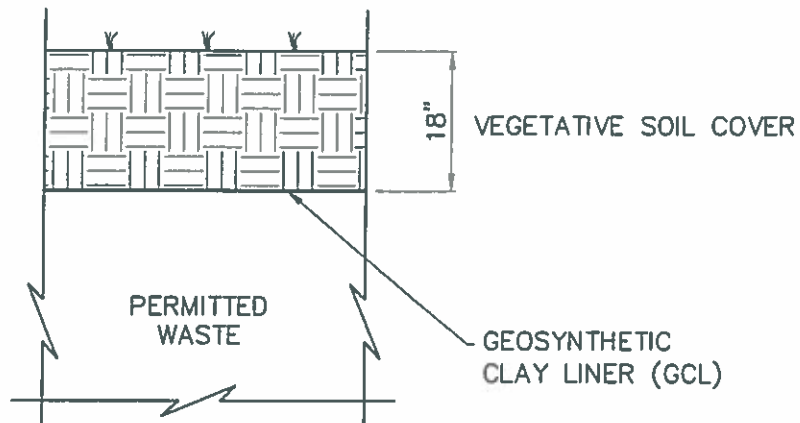
Enclosures:



FINAL COVER SYSTEM (PERMITTED AREA)
NOT TO SCALE

* CLEAN GREEN SAND USED IN THE FINAL COVER SYSTEM WILL NOT CONTAIN SOUTHERN BENTONITE.

ORIGINAL PERMIT DESIGN



FINAL COVER SYSTEM (PERMITTED AREA)
NOT TO SCALE

REVISED DESIGN



REEVES ROAD LANDFILL

**FINAL COVER SYSTEM
MINOR MODIFICATION**
ADEM PERMIT NO. 08-17



TYLER UNION

C20025

JUNE 17, 2020

minimum of 6 inches of soil capable of sustaining plant growth. The GCL will have a minimum permeability of 5×10^{-9} cm/sec.

Following grading and the installation of the GCL, UFCO will loosely place an 18-inch layer of soil that is suitable for growing vegetation. The area will then be hydro seeded with a seed mixture selected for the area.

12.2.2 Exempt Area

For the exempt foundry waste areas, the final cover system will be comprised of a vegetative layer consisting of a minimum of 6 inches of soil that is capable of sustaining plant growth.

12.3 DESCRIPTION OF DISPOSAL AREA

The estimated largest area of the disposal facility that requires a final lined closure cap using a GCL is 2.9 acres.

12.4 FINAL SOIL COVER GRADING

The final soil cover will be graded to prevent ponding of surface water. Average grade for the slopes is 3:1 feet. Minimum final grade will not be less than 5 percent. In general slopes longer than 25 feet will have 15-foot-wide terraces for every 20-foot rise in elevation. Final grading will be completed within 90 days after the unit has received the last known receipt of waste.

12.5 VEGETATIVE COVER

A vegetative cover is established to reduce erosion and maximize evapotranspiration. Preparation of the final cover will include the placement of the appropriate grass seed, fertilizer, and mulch. The Soil Conservation Service or the Alabama Department of Transportation can be contacted to obtain information on a suitable seasonal seed mixture for the facility. Watering and maintenance will be performed to help ensure the germination of grass. There will be no use of deep-rooted vegetation. The final cover

2. Bentonite Geosynthetic Clay Liner

A sodium bentonite geosynthetic clay liner (GCL) will be placed over the existing solid waste. The bentonite GCL shall be Claymax® (unreinforced, in areas with slopes of 10 percent or less), Bentomat® (reinforced, on slopes), or an approved equivalent. Table A.2 contains minimum material properties.

The material supplied shall be of first quality products, manufactured specifically for the purposes of this work, and shall have been demonstrated by prior use to be suitable and durable for such purposes.

Materials received on-site will be inspected by QA/QC personnel to ensure that the specified liner material is installed. Storage of the liner material on-site will be in such a manner as to prevent damage by inclement weather, ultraviolet light, and vandals.

Installation of the bentonite GCL shall proceed in strict compliance with the product manufacturer's recommendations. The liner will be placed only while acceptable weather conditions exist. Inspection will be in accordance with Table A.1. Only that material which can be covered by the overlying green foundry sand layer during a shift shall be deployed. If for any reason work is suspended and a portion of the bentonite GCL would be exposed to the elements, methods to prevent damage from moisture and wind must be provided. Any portion of the GCL damaged must be repaired or replaced.

The GCL shall not be placed during inclement weather or on subgrade which is excessively wet or frozen.

A.5.2 Vegetative Soil Layer

The vegetative soil layer is the uppermost component of the landfill cap, overlying the GCL and green sand layers. It serves to protect the low permeability layer from mechanical and freeze/thaw damage. The vegetative cover established on this uppermost layer protects the final cover from erosion. Soil suitable to support a vigorous vegetative cover shall be placed on top of the drainage material in a manner that will not disturb the geocomposite drainage system. All damaged materials will be replaced and tested in accordance with those methods listed in this narrative and as directed by the QA/QC officer. The inspection and testing procedures described below will be used to ensure that the design objectives of the vegetative soil layer are achieved.

1. Inspect loads of soil brought to the work area to verify that deleterious materials have not been included.

TABLE A.1
SPECIFIC TESTS TO BE PERFORMED
DURING TEST FILL, LINER, AND COVER CONSTRUCTION

Facility Component	Factors to be Tested or to be Inspected	Test or Inspection Methods	Test or Inspection Method Reference	Frequency
Bentonite Geocomposite Liner	Subgrade Free of Debris, Smooth, and Dry	Observation	N/A	Continuous
	Acceptable Weather	Observation	N/A	Continuous
	Placed According to Manufacturer's Recommendations	Observation	N/A	Continuous
	Minimum 6-inch Overlap at Panel Edges	Observation	N/A	Continuous
	Correct Liner Materials Installed as Specified	Observation	N/A	Continuous
	Free of Holes, Tears, and Irregularities	Observation	N/A	Continuous
	Properly Anchored	Observation	N/A	Continuous



June 30, 2021

ADEM – Solid Waste Land Division
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Ref: Reeves Road Landfill
Additional information to complete Renewal Application
Permit Number 08-17

Mr. Hunter,

Per our phone conversation on May 17, 2021 we are enclosing the requested items to satisfy the Permit Renewal Application for our Reeves Road Landfill Waste Disposal Site:

1. Revised Renewal Application updating contact information
2. Up to date list of adjacent landowners
3. Aerial Survey showing permitted boundaries (3.95 acres)
4. Hydrogeology Review of MW
5. Clarify Modification: Modification Letter requested on June 18, 2020 (letter enclosed)
6. Variances: We are requesting the same variances as described in Section VIII of the previously issued permit.
 1. A variance is granted from ADEM Rule 335-13-4-.16 exempting gas monitoring at the Reeves Road Landfill (See Section V)
 - a. Section V: At this time, the Permittee is not required to conduct gas monitoring or install a gas collection system. If the Department determines that monitoring and/or a system is necessary, the Permittee shall submit a proposed plan that would meet the Division 123 regulations.
 2. A variance is granted from ADEM Rule 335-13-4-.23(1)(c) requiring 4-1 slopes on working face and final closure. The Reeves Road Landfill is required a 3 to 1 slope on working face and final closure (see Section III. D and Section VII.,A.).
 - a. 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 3 to 1.

Should you have any questions, please do not hesitate to call.

Respectfully

A handwritten signature in blue ink, appearing to read "S. Blasko", is written over a blue horizontal line.

Steven Blasko

Encl:

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)
☐ CCR Landfill (CCRLF)
☐ CCR Surface Impoundment (CCRSI)
☐ Other (explain) _____

2. Facility Name: Reeves Road Landfill

3. Applicant:

Name: Tyler Union , A Division of McWane, Inc

Address: 1501 W. 17th

Anniston, Al 36201

Telephone: (256) 240-4280

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

Township 15 South Range 7 East
Section 35 County Calhoun

5. Land Owner:

Name: Same as above

Address: _____

Telephone: _____

(Attach copy of agreement from landowner if applicable.)

6. Contact Person:

Name: Steven Blasko

Position or Affiliation: Environmental Director

Address: 1501 West 17th St
Anniston, AL 36201

Telephone: (256) 240-4280

7. Size of Facility:

75
Acres

Size of Disposal Area(s):

3.7
Acres

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

Only waste generated at Tyler Union will be disposed of at this facility.

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

300 Tons/Day Cubic Yards/Day

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

Approved waste streams for the permitted area are limited to nonhazardous. Industrial solid waste generated by Tyler Union's Facility in Anniston, Alabama. Those include green sand, no-bake sand, no-bake core butts, shell core butts, desulfurization slag, cupola slag, quencher drop-out, baghouse dust from various foundry operations, used cement residue, plant generated rubbish, cupola and ductile treatment baghouse dust which has as been stabilized in line to render it nonhazardous.

SIGNATURE



DATE 6-29-2021

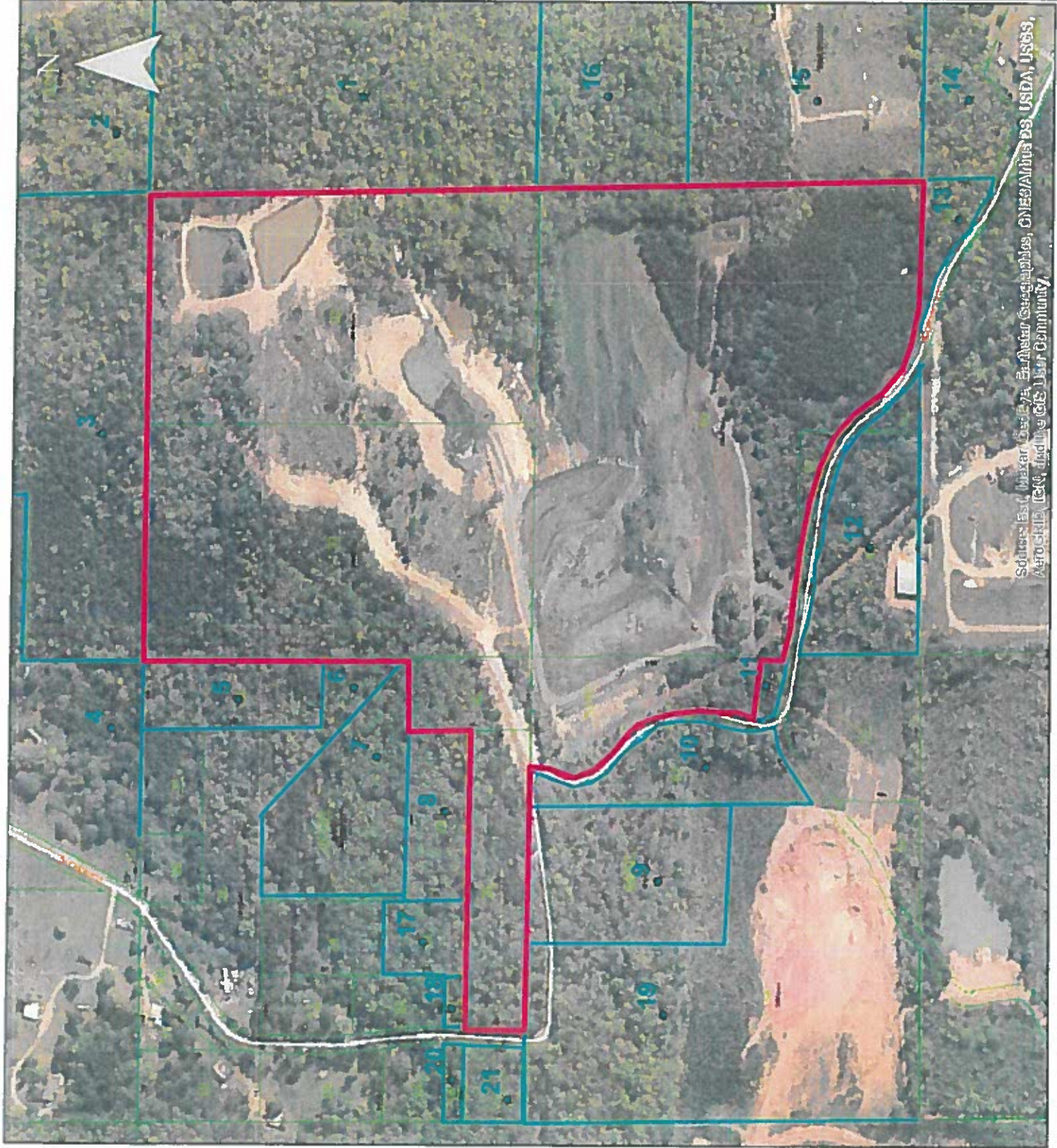


4117 SKYLINE DR. HAWTHORNE AL 36106 (206) 612-3373

NO
CERTIFICATION
NECESSARY

ANNISTON ALABAMA

DATE 01/06/2021



Legend

- Landfill Boundary
- Surrounding Parcels



TITLE

**Parcel Map &
Surrounding Properties**

Tyler Union

Anniston, Alabama

FIGURE NO

General

PROJECT NO

General

DRAWN BY

AJH

DRAWN DATE

6-21-2021



LaBella

Powered by partner ship

518 MINERAL TRACE
HOOVER, AL 35244
(205) 985-1874

Sources: Esri, Maxar Inc., Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 • Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 • FAX (334) 271-7950

January 21, 2021

CERTIFIED MAIL 9489 0090 0027 6298 5416 72
RETURN RECEIPT REQUESTED

Mr. Tom Bell
Tyler Union
1501 W 17th Street
Anniston, AL 36201

RE: Hydrogeology Review
Reeves Road Landfill
Permit 08-17

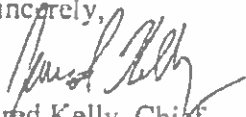
Dear Mr. Bell:

The Alabama Department of Environmental Management (ADEM) has conducted a hydrogeology review for Tyler Union's response, dated February 26, 2021, to ADEM's Hydrogeology Review letter dated January 21, 2021. After review, the following comments were made:

1. The Department acknowledges Tyler Union's agreement with the proposed replacement of MW-3 due to repeat dry conditions.
2. After further evaluation, no well is needed 500 to 1000 feet due west of MW-4 or along the eastern boundary of the landfill, 200 to 250 feet north of the leachate pond, as was requested in a letter dated January 21, 2021.
3. Further observation is warranted for MW-4 given the fact that the well was dry during the last sampling period. Should this well continue to be dry, it may be necessary to evaluate the need for a replacement of MW-4.

If you have any questions regarding this matter, please contact Mr. Hunter Baker of the Solid Waste Engineering Section at (334) 270-5607.

Sincerely,


Jared Kelly, Chief
Solid Waste Engineering Section
Land Division

JDK/hb

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)



Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

FEE SHEET FOR SOLID WASTE PERMITS

ADEM No.: 12660

Applicant: Tyler Union, a Division of McWane Inc
 Location: Reeves Road Landfill
1501 West 17th St.
Anniston, AL 36201

Permit No.: 08-17 Date Application Received: 06/18/20

Permit Fees Required	Initial Issuance	Modification	Reissuance	Total
Municipal Solid Waste Landfill	\$83,880		\$37,270	
Minor Modification ¹		\$3,275		
Major Modification ²		\$32,615		
Construction/Demolition Landfill	\$7,145		\$5,400	
Minor Modification ¹		\$1,460		
Major Modification ²		\$2,915		
Industrial Landfill	\$12,670		\$8,150	
Minor Modification ¹		\$1,460		\$1,460
Major Modification ²		\$4,375		
Compost Facility	\$4,860		\$3,670	
Minor Modification ¹		\$1,225		
Major Modification ²		\$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	

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

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

RECEIVED

JUN 29 2020

**ADEM
EDDS**

Total Fee Due:

Amount Submitted with Application:

Amount Received:

Amount to be Billed:

Amount Received:

Date Received:

Amount to be Refunded:

\$1,460
\$1,460
\$1,460
\$0
\$1,460
JHC 7-8-20
\$0

Fee Schedule Prepared by:

DHB

Date:

6/29/2020

Fee Schedule Reviewed by:

JDK

Date:

6/29/20

"111937"

ADEM No.: 12660

Applicant: Tyler Union, a Division of McWane Inc
 Location: Reeves Road Landfill
 1501 West 17th St.
 Anniston, AL 36201

Permit No.: 08-17 Date Application Received: 12/27/19

Permit Fees Required	Initial Issuance	Modification	Reissuance	Total
Municipal Solid Waste Landfill	\$83,880		\$37,270	
Minor Modification ¹		\$3,275		
Major Modification ²		\$32,615		
Construction/Demolition Landfill	\$7,145		\$5,400	
Minor Modification ¹		\$1,460		
Major Modification ²		\$2,915		
Industrial Landfill	\$12,670		\$8,150	\$8,150
Minor Modification ¹		\$1,460		
Major Modification ²		\$4,375		
Compost Facility	\$4,860		\$3,670	
Minor Modification ¹		\$1,225		
Major Modification ²		\$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	

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

RECEIVED
 JAN 02 2020

ADEM
 EDDS

Total Fee Due:
 Amount Submitted with Application:
 Amount Received:
 Amount to be Billed:
 Amount Received:
 Date Received:
 Amount to be Refunded:

\$8,150
\$8,150
\$8,150
\$0
\$8,150
1-6-20
\$0

Fee Schedule Prepared by: DHB Date: 1/21/2020
 Fee Schedule Reviewed by: JDL Date: 1/2/20

"111018"