

PRELIMINARY DETERMINATION

PERMIT MINOR MODIFICATION

WCA of Alabama, LLC  
13737 Plant Road  
Childersburg, Alabama 35044

WCA of Alabama, LLC Industrial Landfill  
Permit No. 61-16

June 26, 2024

WCA of Alabama, LLC, has submitted to the Alabama Department of Environmental Management (ADEM) an application to modify the Solid Waste Disposal Facility Permit for the WCA of Alabama, LLC Industrial Landfill (Permit No. 61-16). The proposed minor modification would allow the installation and operation of a new leachate storage tank to replace the existing frac. tank; it would also allow the replacement of the leachate force main with a new dual-contained leachate force main pipe. The waste stream for the WCA of Alabama, LLC Industrial Landfill would remain non-hazardous industrial wastes, construction and demolition wastes, asbestos, automobile shredder dirt and fluff, and tires. The service area for the WCA of Alabama, LLC Industrial Landfill would remain Bibb, Calhoun, Clay, Chilton, Cleburne, Etowah, Jefferson, Shelby, St. Clair, Talladega, and Tallapoosa Counties in Alabama. The maximum average daily volume of waste disposed at the WCA of Alabama, LLC Industrial Landfill would remain 750 tons per day. All other permit conditions would remain the same.

The landfill is located in Section 21, Township 19 South, Range 3 East in Talladega County, Alabama. The WCA of Alabama, LLC Industrial Landfill consists of approximately 104.88 acres with 57.95 acres approved for disposal operations.

The Land Division has determined that the permit modification application complies with the applicable requirements of ADEM's Administrative Code Division 13 regulations for an industrial solid waste landfill.

Technical Contact:

Melissa H. Adornato  
Solid Waste Engineering Section  
Land Division  
(334) 270-5605



ALABAMA  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

# ***SOLID WASTE DISPOSAL FACILITY PERMIT***

**PERMITTEE:** WCA of Alabama, LLC

**FACILITY NAME:** WCA of Alabama, LLC Industrial Landfill

**FACILITY LOCATION:** Section 21, Township 19 South, Range 3 East in Talladega County, Alabama. The total permitted area is approximately 104.88 acres with approximately 57.95 acres permitted for disposal operations.

**PERMIT NUMBER:** 61-16

**PERMIT TYPE:** Industrial Landfill

**WASTE APPROVED FOR DISPOSAL:** Non-hazardous industrial wastes, construction and demolition wastes, asbestos, automobile shredder dirt and fluff, and tires.

**APPROVED WASTE VOLUME:** Maximum Average Daily Volume of 750 tons per day

**APPROVED SERVICE AREA:** Bibb, Calhoun, Clay, Chilton, Cleburne, Etowah, Jefferson, Shelby, St. Clair, Talladega, and Tallapoosa counties in Alabama.

*In accordance with and subject to the provisions of the Alabama 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:** XXXXXXXX

**EFFECTIVE DATE:** XXXXXXXX

**MODIFICATION DATE:** XXXXXXXX

**EXPIRATION DATE:** XXXXXXXX

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

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Permittee: WCA of Alabama, LLC  
13737 Plant Road  
Childersburg, Alabama 35044

Landfill Name: WCA of Alabama, LLC Industrial Landfill

Landfill Location: Section 21, Township 19 South, Range 3 East in Talladega County, Alabama

Permit Number: 61-16

Landfill Type: Industrial

Pursuant to the Solid Wastes & Recyclable Materials Management Act, Code of Alabama 1975, §§22-27-1, *et seq.*, as amended, and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM), this permit is issued WCA of Alabama, LLC (hereinafter called the Permittee), to operate a solid waste disposal facility, known as the WCA of Alabama, LLC 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 335-13-16 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 to the Department on January 7, 2019, for permit renewal, and on November 29, 2023, for modification, as amended, 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 the Department 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 **August 6, 2019**, modified ??????, and shall remain in effect until **August 5, 2024**, 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 Admin. Code 335-13. 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, §§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 335-13, 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 constitutes a violation of Code of Alabama 1975, §§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 one hundred eighty (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 the Department, within a reasonable time, any information that the Department 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, §§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 ADEM Admin. Code 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, 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 one hundred twenty (120) 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. Before the Permittee may commence disposal of waste in any new cell or phase:
- a. The Permittee must submit a letter to the Department signed by both the Permittee and a professional engineer stating that the facility has been constructed in compliance with the permit.
  - b. The Department must inspect the constructed cells or phases unless the Permittee is notified that the Department will waive the inspection.
  - c. The Permittee may not commence disposal activities in any new cells or phases until approval of the new cells or phases is granted by the Department.
13. Noncompliance. The Permittee shall report all instances of noncompliance with the permit at the time noncompliance is discovered.
14. 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 335-13-4-.21(1)(b).
  - 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, Paragraph I. The operating record shall include:

- a. Documentation of inspections 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 wastes and special wastes.
  - e. Groundwater monitoring records, if required.
  - f. Explosive gas monitoring records, if required.
  - g. Surface water and leachate monitoring records. **Monitoring is subject to applicable conditions of Section VI of this 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 action 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 an annual basis, and the reports should be submitted to the Department and placed in the operating record within thirty (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 ADEM Admin. Code 335-13 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 ADEM Admin. Code 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 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 WCA of Alabama, LLC Industrial Landfill office, 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:

1. Mailing Address.

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

2. 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 335-13.

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, as provided in the Application, for detecting and preventing the disposal of free liquids, regulated hazardous waste, PCBs, medical waste, and other unauthorized waste streams 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.
- G. Certified Operator. The Permittee shall be required to have an operator certified by the Department on-site during hours of operation, in accordance with the requirements of ADEM Admin. Code 335-13-12.

### SECTION III. SPECIFIC REQUIREMENTS FOR INDUSTRIAL WASTE LANDFILLS

- A. Waste Identification and Management.
  - 1. Subject to the terms of this permit, the Permittee may accept for disposal the non-hazardous 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 WCA of Alabama, LLC Industrial Landfill is approximately 104.88 acres with approximately 57.95 acres permitted for disposal operations.
  - 3. The maximum average daily volume of waste disposed at the facility shall not exceed 750 tons/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 ADEM Admin. Code 335-13-5-.06(2)(b)2. An increase in the maximum average daily volume shall not be approved by the Department unless the Permittee has received local approval for the increased maximum average daily volume. The average daily volume shall be computed as specified by ADEM Admin. Code 335-13-4-.23(2)(f).
- B. Waste Streams. The Permittee may accept for disposal non-hazardous industrial wastes, construction and demolition wastes, asbestos, automobile shredder dirt and fluff, and tires.
- C. Service Area. The Permittee is allowed to receive waste for disposal from the following counties: Bibb, Calhoun, Clay, Chilton, Cleburne, Etowah, Jefferson, Shelby, St. Clair, Talladega, and Tallapoosa counties in Alabama.
- D. Waste Placement, Compaction, and Cover. All waste shall be confined to an area as small as possible within a single working face and placed onto an appropriate slope not to exceed 3 to 1. (See Section VIII, Paragraph 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 approved by the Department and listed in Section VIII shall be added at the conclusion of each week's operation unless a variance is granted in Section VIII.
- E. Liner Requirements. The Permittee shall be allowed to use in situ soil with an in situ soil permeability of  $1 \times 10^{-7}$  cm/sec or less instead of a 2-foot soil liner. The Permittee shall be required to verify the soil permeability of the first 2 feet of in situ soil after excavation to cell bottom grade. All in situ soil permeability test results and test locations shall be submitted to the Department for approval before disposal of waste. If the in situ soil does not have a permeability of  $1 \times 10^{-7}$  cm/sec or less, the Permittee shall be required to install a 2-foot soil liner with a soil permeability of  $1 \times 10^{-7}$  cm/sec or less. The soil liner shall be compacted in lifts of 4 to 6 inches within 4 percent of the optimum moisture content (or as approved by the Department). The base of the liner system shall be a minimum of five (5) feet above the temporal fluctuation 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 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 ADEM Admin. Code 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 ADEM Admin. Code 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 (Section IV, Paragraph A, Subparagraph 4) during the active life and the post-closure care period.
  - 2. The Permittee shall maintain groundwater monitoring well MW-2 as the background groundwater monitoring well for the entire facility.
  - 3. The Permittee shall evaluate the groundwater data (statistical analysis) as described in the Application and ADEM Admin. Code 335-13-4-.27.

4. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with the ADEM Admin. Code 335-13.
5. Prior to installing any additional groundwater monitoring wells, the Permittee shall submit a plan to ADEM with a permit modification request specifying the design, location, and installation of any additional monitoring wells. This plan shall be submitted at least one hundred twenty (120) 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 submitted as required by ADEM Admin. Code Division 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 ADEM Admin. Code 335-13-4, in all monitoring wells identified in Section IV, Paragraph A, Subparagraph 2, to establish background water quality and/or as directed by ADEM Admin. Code 335-13-4-.27(2)(j) and ADEM Admin. Code 335-13-4-.27(2)(a)(1).
4. The Permittee shall sample and analyze all monitoring wells identified in Table 1 for the parameters listed in Appendix I of ADEM Admin. Code 335-13-4 on a semi-annual basis throughout the active life of the facility and the post-closure care period in accordance with ADEM Admin. Code 335-13-4-.27(3). Sampling shall be conducted during March and September of each year beginning with the effective date of this permit. The records and results of this sampling and analysis activity shall be submitted to the Department within ninety (90) days of the date of sampling.
5. In addition to the requirements of Sections IV, Paragraph B, Subparagraphs 1, 2, 3, and 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, Paragraph 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.

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.
4. The Permittee is approved for **inter-well** statistical analysis.

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, Paragraph E, Subparagraph 9c.
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, Paragraph I, Subparagraph 1.

- E. Permit Modification. If the Permittee or ADEM determines that the groundwater monitoring system no longer satisfies the requirements of ADEM Admin. Code 335-13-4-.14 or Section IV, Paragraph A, of this permit, the Permittee must, within one hundred twenty (120) 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
<b>UPGRADIENT/BACKGROUND MONITORING WELL</b>		
MW-2	460.11	Entire Landfill
<b>DOWNGRADIENT MONITORING WELLS</b>		
MW-1R	487.52	Entire Landfill
MW-4	472.66	Entire Landfill
MW-6	439.02	Entire Landfill
MW-7	438.37	Entire Landfill
MW-8	432.20	Entire Landfill

SECTION V. GAS MONITORING REQUIREMENTS

The permittee must install and maintain an explosive gas monitoring system in accordance with ADEM Admin. Code 335-13.

## 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.

The Permittee shall install a leachate collection system designed to maintain less than a 12-inch depth of leachate over the liner. Each cell shall be designed to collect leachate using the collection line and sump as depicted in the Application. Leachate collected will be pumped and transferred through the force main to the new 150,000-gallon leachate storage tank as depicted in the Application and additional information, received November 29, 2023, and January 23, 2024, respectively. Upon constructing future cells, a new leachate generation estimate shall be prepared and tanks built to handle any new additional leachate capacity.

## SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

The Permittee shall close the landfill and perform post-closure care of the landfill in accordance with ADEM Admin. Code 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 comply with ADEM Admin. Code 335-13. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.20(2)(c)2. requiring a maximum 4 to 1 (25%) final grade for the final closure system. The final cover system shall not exceed a final grade of 3 to 1 (33.3%). (See Section VIII, Paragraph 1.)
- B. Vegetative Cover. The Permittee shall establish a vegetative or other appropriate cover within ninety (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 one hundred eighty (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 a registered professional 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 a minimum 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.
- 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 the Department. 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 has 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 independent registered professional engineer, verifying the post-closure has been completed according to the Post-Closure Plan.
- J. Recording Instruments. The Permittee must provide documentation of compliance with the requirements of the Uniform Environmental Covenants Program in ADEM Admin. Code 335-5 and shall execute the following:
1. Record a notation onto the land deed within ninety (90) days from the certification of closure. 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.
  2. File the covenant at the courthouse where the land deed is held within thirty (30) days of receipt of the covenant signed by ADEM's Land Division Chief.
  3. The Permittee shall submit a certified copy of the recording instrument to ADEM within one hundred twenty (120) days after permit expiration, revocation, or as directed by ADEM as described in the Application.
- K. 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. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.20(2)(c)2. requiring a maximum 4 to 1 (25%) final grade for the final closure system. The final cover system shall not exceed a final grade of grade of 3 to 1 (33.3%). (See Section VII., Paragraph A.)
2. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.23(1)(c) requiring 4 to 1 (25%) operating slopes. The Permittee shall be allowed 3 to 1 (33.3%) operating slopes. (See Section III, Paragraph 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 No. 61-16 Minor

Modification Application



November 29, 2023

Mr. Jared Kelly  
Chief of Solid Waste  
ADEM Land Division  
1400 Coliseum Boulevard  
Montgomery, AL 36110

**Re: WCA Alabama, LLC – Industrial Landfill  
Minor Modification – Leachate Forcemain and Storage Tank  
Permit Number: 61-16**

Dear Mr. Kelly:

WCA Alabama, LLC is requesting approval of a minor modification to the Solid Waste Permit at the WCA Alabama, LLC – Industrial Landfill. The purpose of this modification is to update the Permit Drawings to show the location of the recently installed leachate storage tank and forcemain.

The following documents are attached to support this modification request:

1. Leachate Forcemain and Storage Tank Location, Sheet 5B of 12
1. Completed application form (ADEM Form 439);
2. Fee in the amount of \$1,460 for the application fee has been paid via the ADEM Online ePay website (receipt attached);

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

Sincerely,

**WCA Alabama, LLC – Industrial Landfill**

*Jonathan Williams*  
Jonathan Williams (Nov 29, 2023 13:47 CST)

Jonathan Williams  
General Manager

*Enclosure*

cc: Ed Hood (w/o enclosure)  
Batini Robinson (w/o enclosure)  
Melissa Adornato (w/o enclosure)



**Robert Heller**

---

**Subject:** FW: ADEM - ADEM General Payment

**From:** [receipts@alabamainteractive.org](mailto:receipts@alabamainteractive.org) <[receipts@alabamainteractive.org](mailto:receipts@alabamainteractive.org)>

**Sent:** Monday, November 13, 2023 10:34 AM

**To:** Jonathan Williams <[jonathan.williams@gflenv.com](mailto:jonathan.williams@gflenv.com)>

**Subject:** ADEM - ADEM General Payment

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

## Payment Receipt

11/13/2023 10:33 AM

Thank you for completing your transaction.  
Please save a copy of this receipt for your records.

**Receipt Confirmation Number: 20231113000007464**

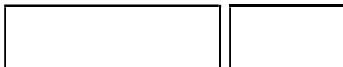
Agency: Alabama Department Of Environmental  
Management

Application: ADEM General Payment

Payment Item	Fee
Application Fee	\$1,460.00
<b>Total Fee through <a href="https://alabama.gov">Alabama.gov</a> <i>(learn more)</i></b>	<b>\$1,505.80</b>

*This online service is provided by Alabama Interactive, LLC, a third party, working under a contract awarded and administered by Alabama's Department of Finance as authorized under contract number T001. The online price of items or services purchased through [Alabama.gov](https://alabama.gov), the state's official web portal, includes funds to develop, maintain, enhance and expand offerings of the state's portal.*

This is a system generated message.  
Please do not reply to this email.



# 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)  
                                  Construction and Demolition Landfill (C/DLF)  
                                  CCR Landfill (CCRLF)  
                                  CCR Surface Impoundment (CCRSI)  
                                  Other (explain) \_\_\_\_\_

2. Facility Name WCA of Alabama, LLC Industrial Landfill

3. Applicant/Permittee:

Name: WCA of Alabama, LLC

Address: 13737 Plant Rd  
Childersburg, AL 35044

Telephone: (205) 368-0864

If applicant/permittee is a Corporation, please list officers:

Patrick Dovigi - President, Jonathan Lucas Pelosi - Treasurer, Mindy Gilbert - Secretary

Melissa Bachhuber - Assistant Secretary

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

Township 19S            Range 3E  
Section 21            County Talladega

5. Land Owner:

Name: WCA of Alabama, LLC (96.79±)            Childersburg River Property, LLC (8.09±)

Address: 1330 Post Oak Blvd, 7th Floor            120 Bishop Circle  
Houston, Texas 77056            Pelham, Alabama 35124

Telephone: (205) 368-0864

(Attach copy of agreement from landowner if applicable.)

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

**6. Contact Person:**

**Name** Robert Harbin

**Position or Affiliation** Landfill Operations Manager

**Address:** 13737 Plant Rd  
Childersburg, AL 35044

**Telephone:** (256) 378-6878

**7. Size of Facility:**

104.88 **Acres**

**Size of Disposal Area(s):**

57.95 **Acres**

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

Bibb, Calhoun, Clay, Chilton, Etowah, Jefferson, Shelby, St. Clair, Talladega,  
and Tallapoosa counties in Alabama

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

750 **Tons/Day**      \_\_\_\_\_ **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.):**

Nonhazardous industrial wastes, construction and demolition wastes, asbestos,  
automobile shredder dirt and fluff, and tires.

**SIGNATURE (Responsible official of permit applicant):**

Jonathan Williams  
Jonathan Williams (Nov 29, 2023 13:47 CST)

**TITLE:** General Manager

Jonathan Williams  
**(please print or type name)**

**DATE:** Nov 29, 2023

Reply Forward

7/1

Robert Heller <rheller@HHNT.COM>  
To: Adornato, Melissa H

📧 ⏪ ⏩ ⏴ ⏵

Wed 5/22/2014 2:02 PM

Definitely a typo on the mod application.  
The renewal application had it correct.  
Do you want mod application resubmitted?

---

**ROBERT D. HELLER, CHDM**  
Environmental Manager

Hodge, Hodges, Newberry & Thibault, Inc.  
2022 Ashbridge Road, Suite 101 | Ocean Springs, AL 36566  
Phone: (256) 714-7112 | Cell: (256) 370-6002 | Fax: (256) 714-0702  
Email: [rheller@hhnt.com](mailto:rheller@hhnt.com)  
[www.hhnt.com](http://www.hhnt.com)



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[View](#)

A/1

Adornato, Melissa H  
To: Robert Heller <rheller@HHNT.COM>

📧 ⏪ ⏩ ⏴ ⏵

Wed 5/22/2014 2:07 PM

I apologize—I'm behind on processing applications. I am hoping to be done this week with the draft modified permit. I do have a question for you, though: one of the counties in their service area was left off of the modification application—I'm not sure if that was an oversight or if they want to remove that county from their service area?

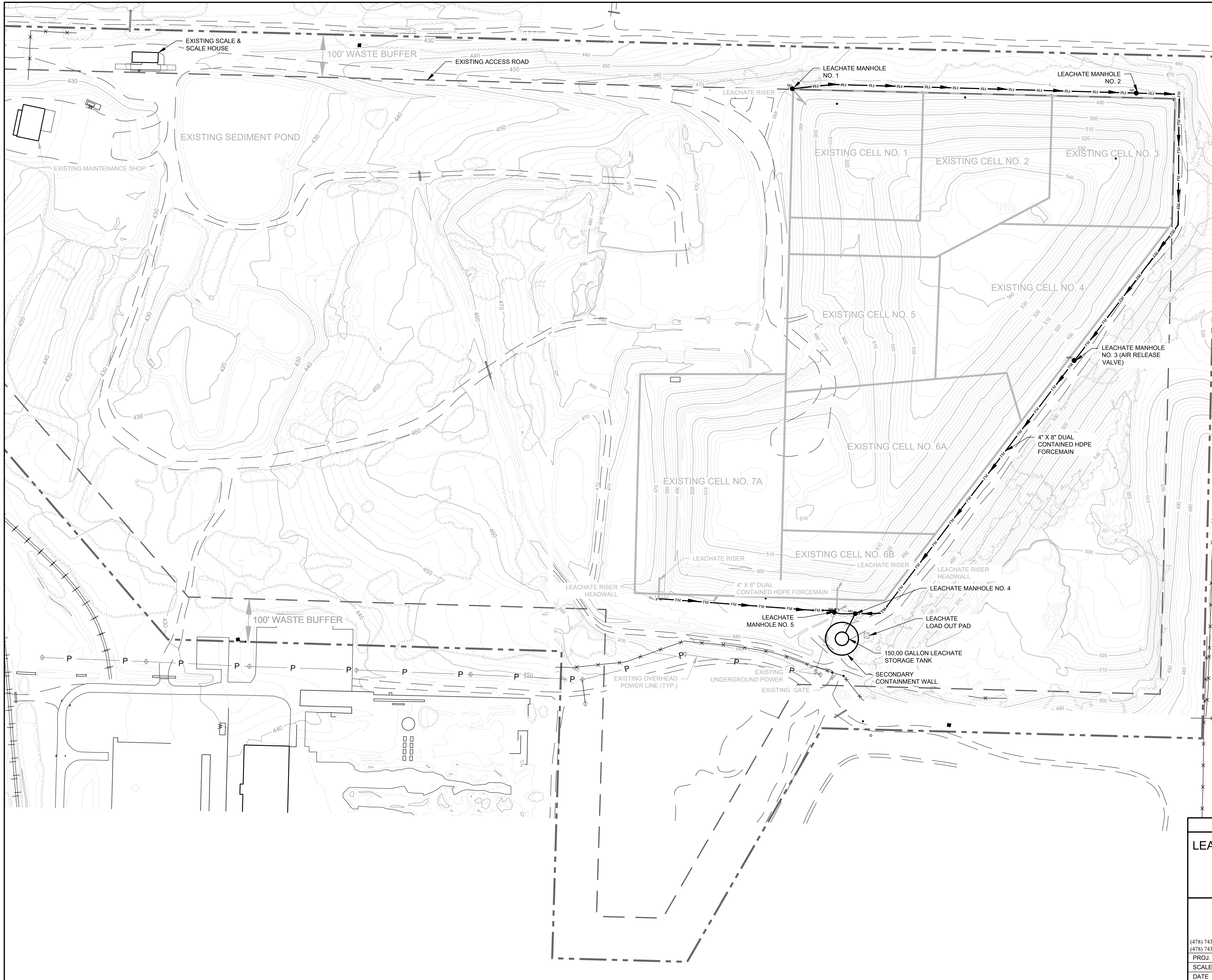
Thanks,

**Melissa M. Adornato**  
Alabama Department of Environmental Management  
Land Division  
Solid Waste Branch  
Solid Waste Engineering Section  
Phone: (204) 270-5605  
[melissa.adornato@adem.alabama.gov](mailto:melissa.adornato@adem.alabama.gov)



P.O. Box 201483



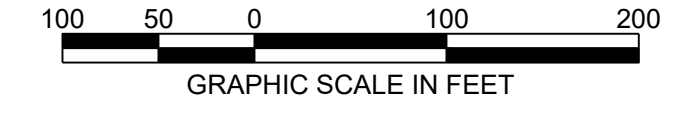


- NOTES:
1. PROPERTY LINE AND BUFFER LINE TAKEN FROM A DRAWING ENTITLED "SHT1-BOUNDARY SURVEY" PROVIDED BY BULLSEYE DESIGN SERVICES, INC.
  2. TOPOGRAPHIC INFORMATION ON WESTERN SIDE PROVIDED BY COOPER AERIAL SURVEYS, CO., DATE OF PHOTOGRAPHY: FEBRUARY 20, 2021. TOPOGRAPHIC INFORMATION ON EASTERN SIDE PROVIDED BY COOPER AERIAL SURVEYS, CO., DATE OF PHOTOGRAPHY: JANUARY 10, 2023.
  3. ALL EXISTING UTILITY LOCATIONS SHOULD BE CONSIDERED APPROXIMATE.

**LEGEND**

PROPERTY LINE	---
BUFFER LINE	- - - - -
EXISTING CELL BOUNDARY	---
2' CONTOUR	102
10' CONTOUR	100
TREE LINE	~ ~ ~ ~ ~
PAVED ROAD	====
UNPAVED ROAD	----
LEACHATE FORCEMAIN	FM FM FM
FENCE	x x x x
POWERLINE	P
RAILROAD	+
BUILDING	□
POWERPOLE	⊕

FOR PERMITTING USE ONLY  
NOT TO BE USED FOR CONSTRUCTION



LEACHATE FORCEMAIN AND STORAGE TANK LOCATION  
**LEACHATE TANK & FORCEMAIN MODIFICATION**  
WCA ALABAMA, LLC - INDUSTRIAL LANDFILL  
FOR  
WCA ALABAMA, LLC  
TALLADEGA COUNTY, ALABAMA

**HHNT**  
HODGES, HARBIN,  
NEWBERRY & TRIBBLE, INC.  
Consulting Engineers

(478) 743-7175  
(478) 743-1703 (FAX)

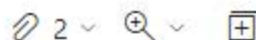
3920 ARKWRIGHT RD.  
SUITE 101  
MACON, GEORGIA 31210

PROJ. NO.	3032-080-02	FINES-LTFM-MODIF-SHEETS-DWG	EDIT	11/15/23
SCALE	1" = 100'			
DATE	NOVEMBER 2023			

**SHEET 5B OF 12**



## WCA Alabama, LLC – Industrial Landfill - Minor Modification Leachate Forcemain and Storage Tank



**To:** Adornato, Melissa H <melissa.adornato@adem.alabama.gov>

**Cc:** Kelly, Jared <jkelly@adem.alabama.gov>; Batini Robinson <batinirobinson@gflenv.com>; rharbin@gflenv.com; Kevin Berry <kberry@HHNT.COM>; Edward Hood <edward.hood@gflenv.com>; Jonathan Williams <jonathan.williams@gflenv.com>

**Subject:** RE: WCA Alabama, LLC – Industrial Landfill - Minor Modification Leachate Forcemain and Storage Tank

Melissa,

As requested, please find the attached revised Plan Sheet that shows the tank specs and loadout pad detail. This plan sheet shall replace and supersede the sheet previously submitted on November 29, 2023.

Thank You,

---

**ROBERT D. HELLER, CHMM**

*Environmental Manager*

Hodges, Harbin, Newberry & Tribble, Inc.

3920 Arkwright Road, Suite 101 | Macon, Georgia 31210

Phone: (478) 743-7175 | Cell: (478) 297-6838 | Fax: (478) 743-1703

Email: [rheller@hhnt.com](mailto:rheller@hhnt.com)

[www.hhnt.com](http://www.hhnt.com)



 RH

Robert Heller &lt;rheller@HHNT.COM&gt;

To: Adornato, Melissa H

Cc: Kevin Berry &lt;kberry@HHNT.COM&gt;



Tue 1/23/2024 4:32 PM



Fines-LTFM-Modif-Sheets-1-... ▾

2 MB

See if you can open this drawing. It is locked for editing but should be able to view it.  
Installed in May 2023.

This tank replaced a small frac tank that was previous used.

---

**ROBERT D. HELLER, CHMM***Environmental Manager*

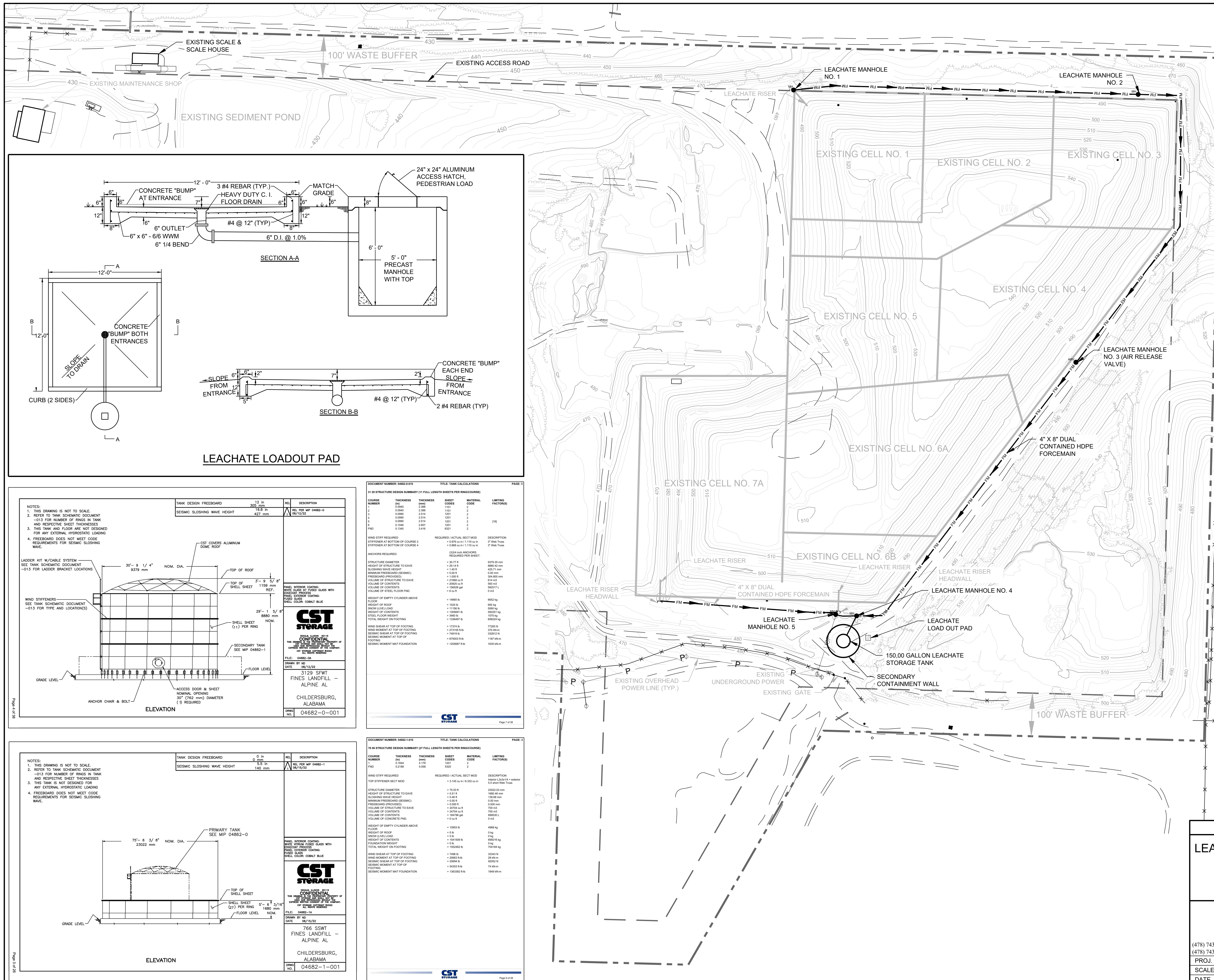
Hodges, Harbin, Newberry &amp; Tribble, Inc.

3920 Arkwright Road, Suite 101 | Macon, Georgia 31210

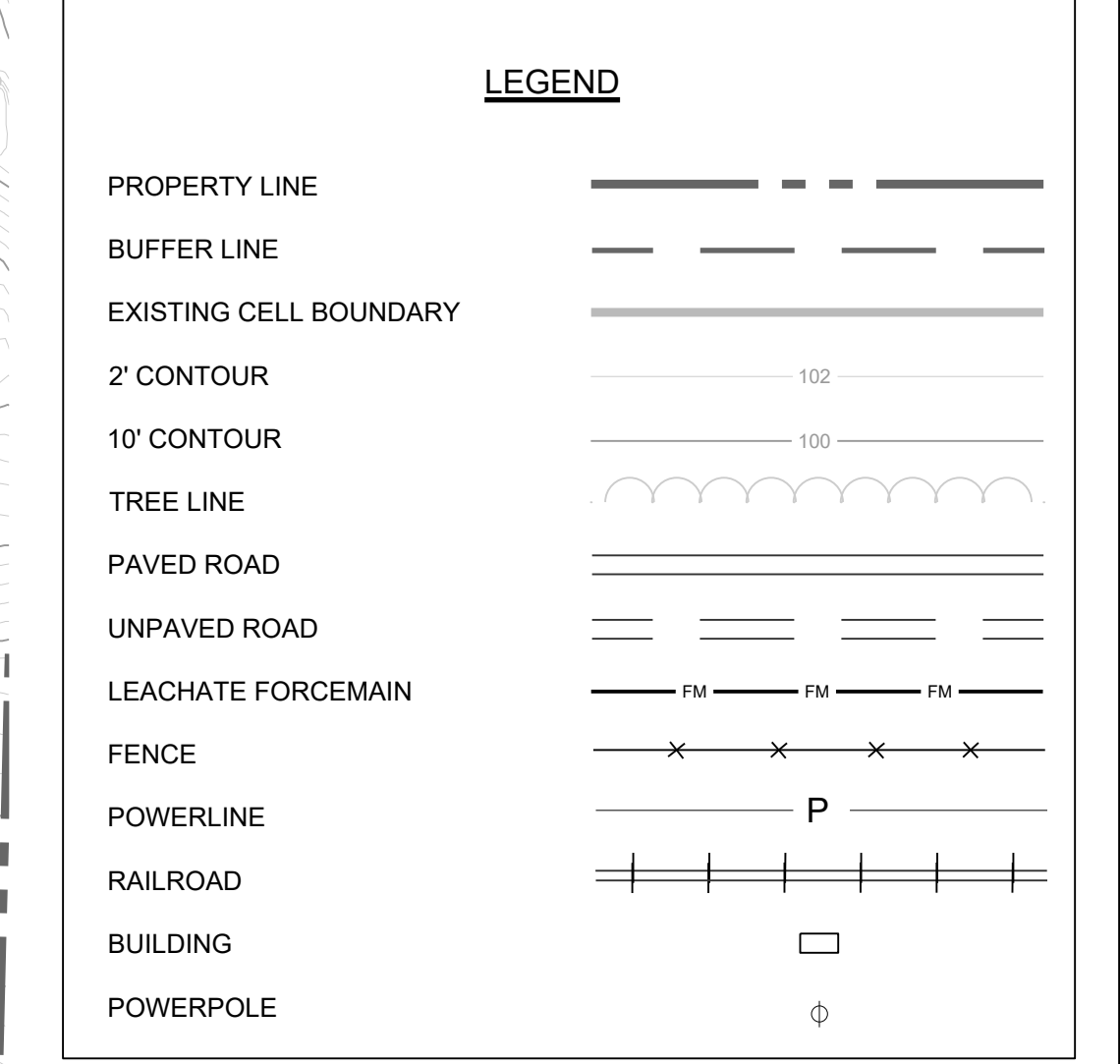
Phone: (478) 743-7175 | Cell: (478) 297-6838 | Fax: (478) 743-1703

Email: [rheller@hhnt.com](mailto:rheller@hhnt.com)[www.hhnt.com](http://www.hhnt.com)

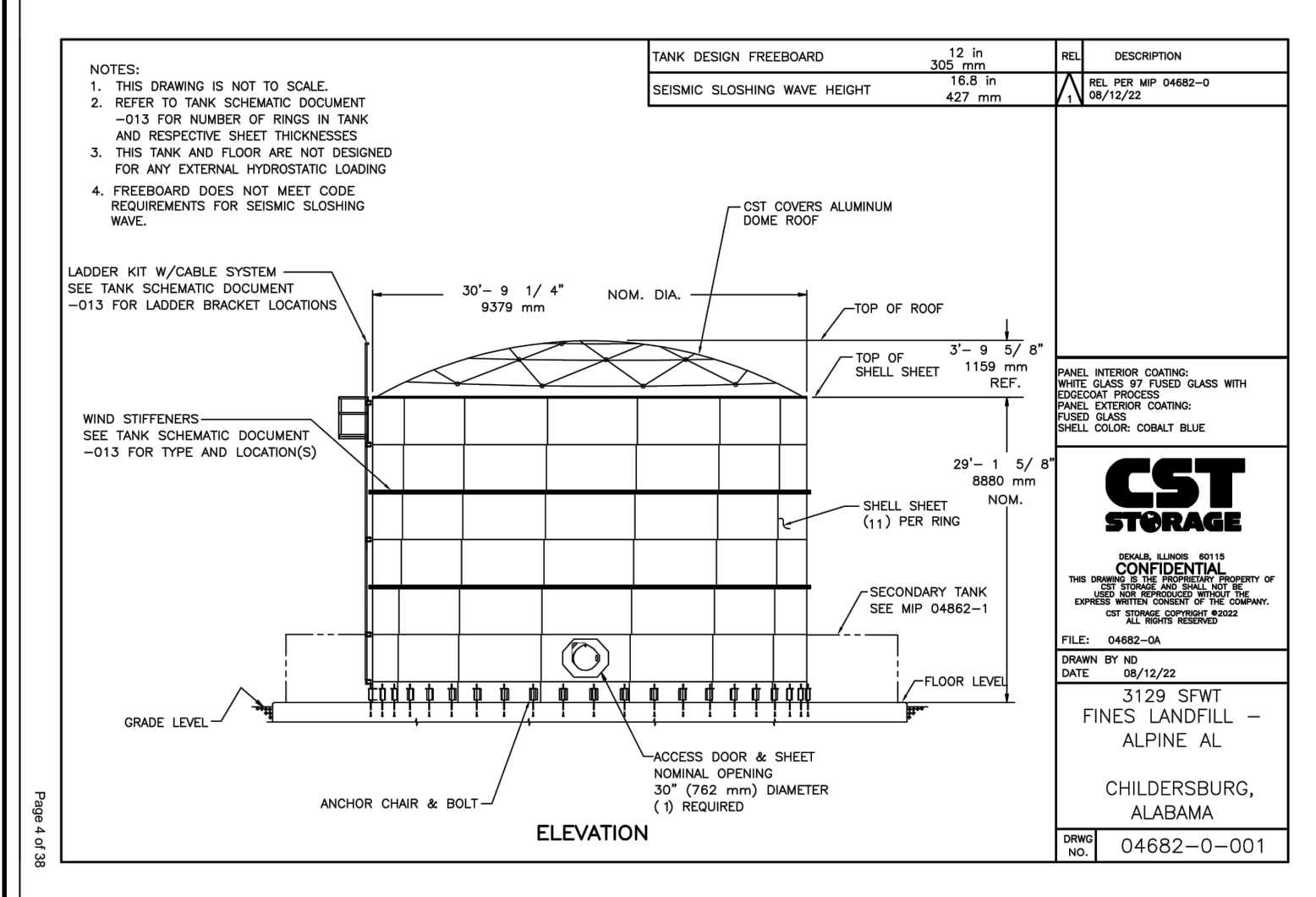
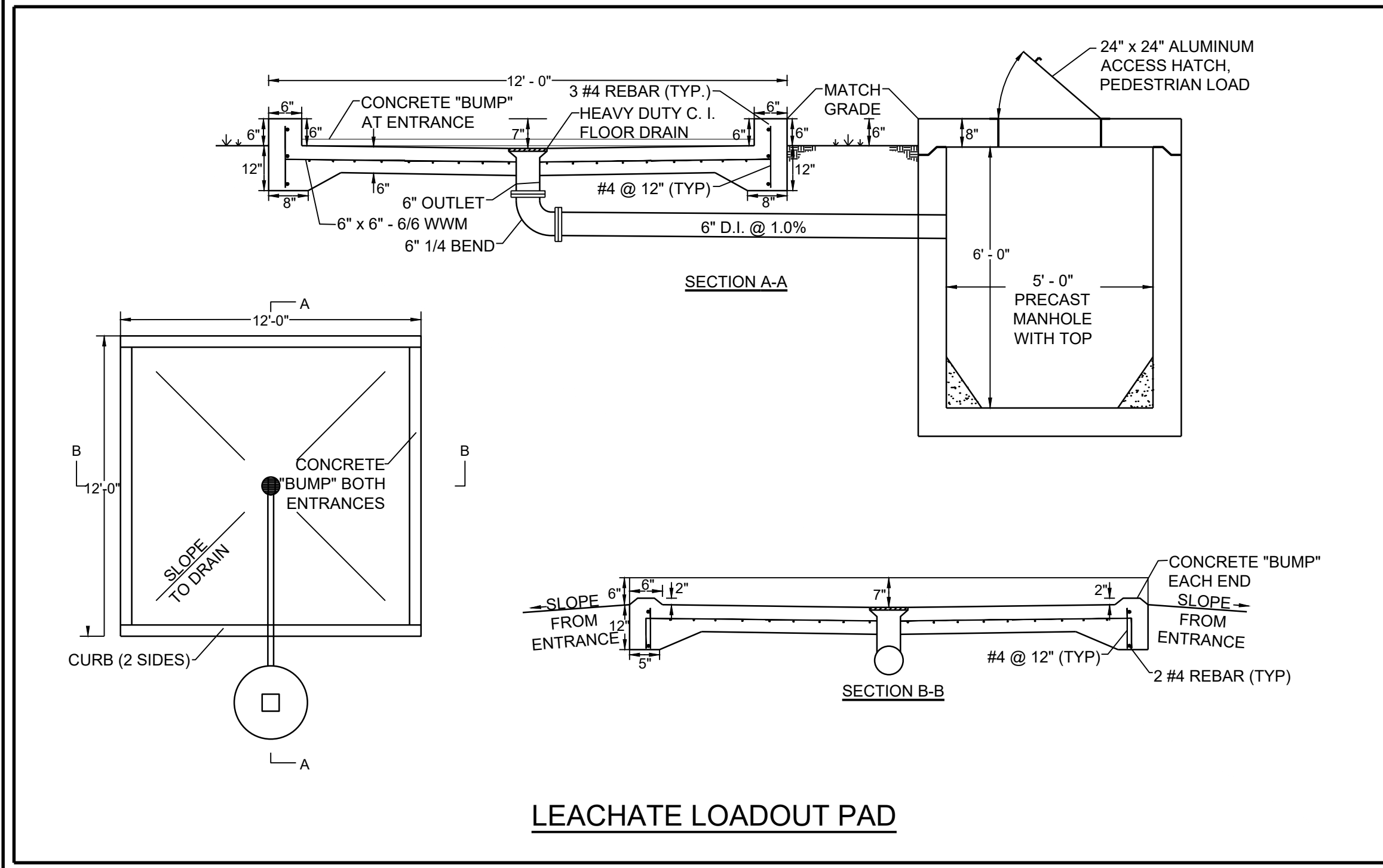
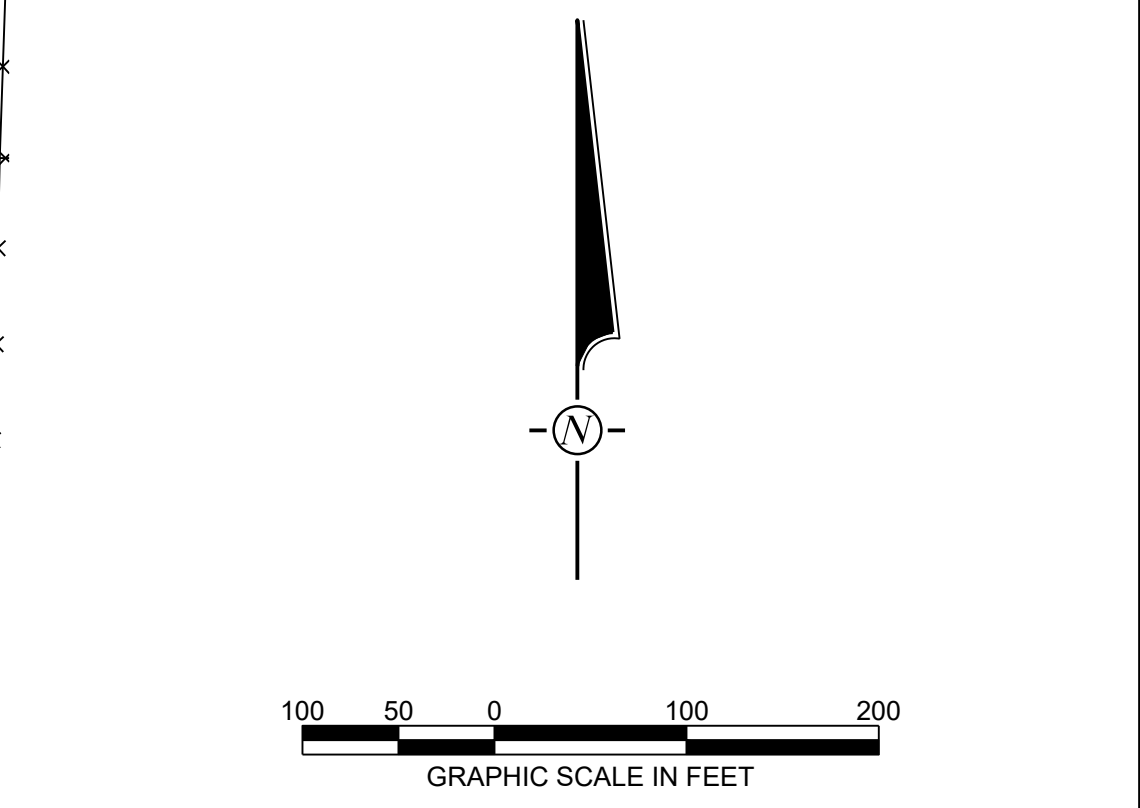




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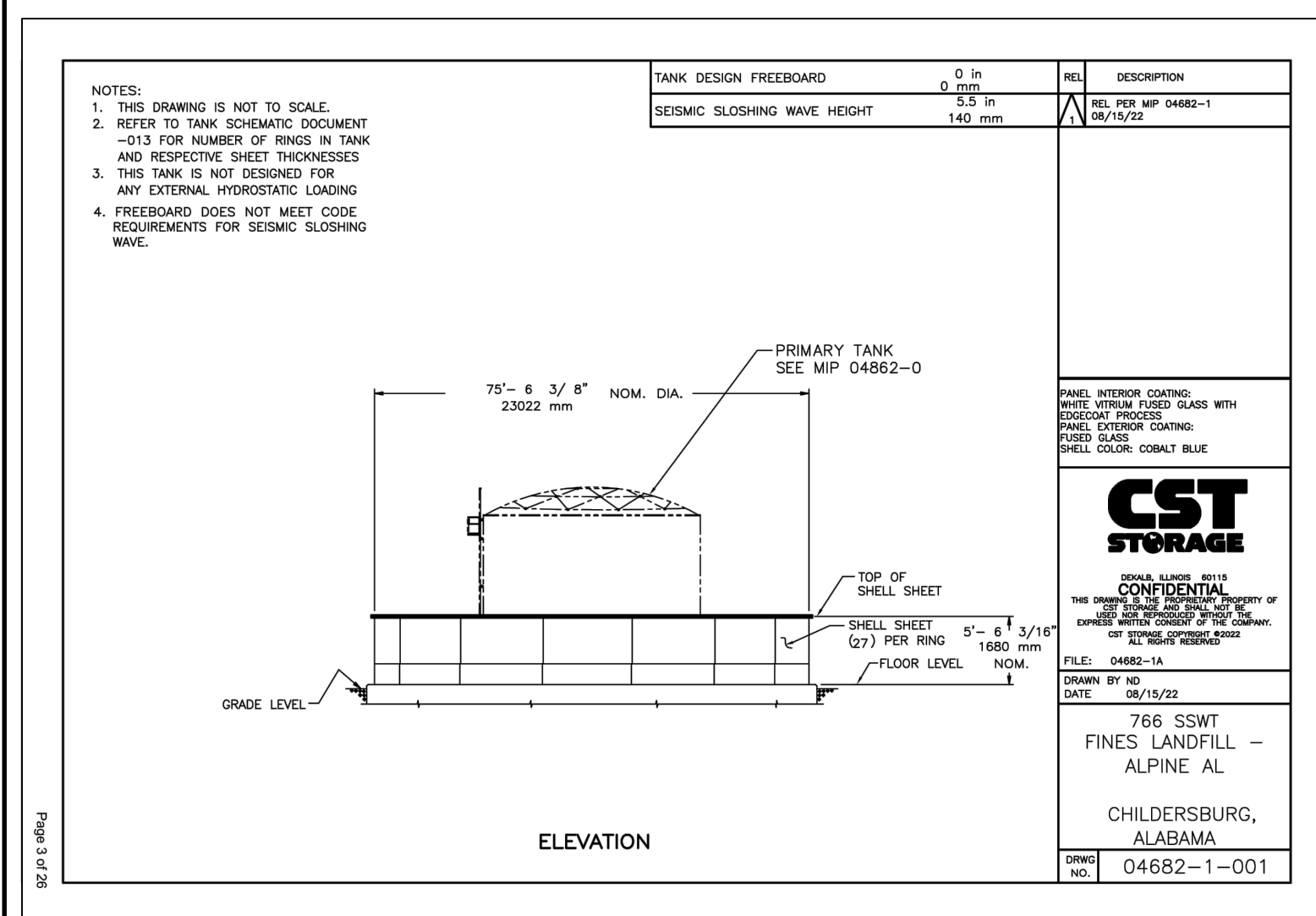
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DOCUMENT NUMBER: 04682-0-010 TITLE: TANK CALCULATIONS PAGE: 1

12 IN STRUCTURE DESIGN SUMMARY (21 FULL LENGTH SHEETS PER RING/COURSE)

COURSE NUMBER	THICKNESS (in)	THICKNESS (mm)	SHEET CODE	MATERIAL CODE	LIMITING FACTORS
1	0.1345	3.416	1201	2	
2	0.1345	3.416	1201	2	
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DOCUMENT NUMBER: 04682-1-010 TITLE: TANK CALCULATIONS PAGE: 3

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38	0.1345	3.416	1201	2	
39	0.1345	3.416	1201	2	
40	0.1345	3.416	1201	2	
41	0.1345	3.416	1201	2	
42	0.1345	3.416	1201	2	
43	0.1345	3.416	1201	2	
44	0.1345	3.416	1201	2	
45	0.1345	3.416	1201	2	
46	0.1345	3.416	1201	2	
47	0.1345	3.416	1201	2	
48	0.1345	3.416	1201	2	
49	0.1345	3.416	1201	2	
50	0.1345	3.416	1201	2	
51	0.1345	3.416	1201	2	
52	0.1345	3.416	1201	2	
53	0.1345	3.416	1201	2	
54	0.1345	3.416	1201	2	
55	0.1345	3.416	1201	2	
56	0.1345	3.416	1201	2	
57	0.1345	3.416	1201	2	
58	0.1345	3.416	1201	2	
59	0.1345	3.416	1201	2	
60	0.1345	3.416	1201	2	
61	0.1345	3.416	1201	2	
62	0.1345	3.416	1201	2	
63	0.1345	3.416	1201	2	
64	0.1345	3.416	1201	2	
65	0.1345	3.416	1201	2	
66	0.1345	3.416	1201	2	
67	0.1345	3.416	1201	2	
68	0.1345	3.416	1201	2	
69	0.1345	3.416	1201	2	
70	0.1345	3.416	1201	2	
71	0.1345	3.416	1201	2	
72	0.1345	3.416	1201	2	
73	0.1345	3.416	1201	2	
74	0.1345	3.416	1201	2	
75	0.1345	3.416	1201	2	
76	0.1345	3.416	1201	2	
77	0.1345	3.416</			