PRELIMINARY DETERMINATION

PERMIT RENEWAL AND MINOR MODIFICATION

Esfeller Construction and Demolition Recycling, LLC
8230 Padgett Switch Road
Irvington, AL 36544

Esfeller C&D Landfill
Permit No. 49-34

February 11, 2026

The Esfeller Construction and Demolition Recycling, LLC has applied for a permit renewal and modification to the construction and demolition waste landfill known as the **Esfeller C&D Landfill (Permit 49-34)**. The facility was originally approved for a single cell (Cell No. 1) approximately 92.4 acres on March 16, 2018. The proposed modification is the division of the permitted waste disposal area into four separate cells. The waste stream for the Esfeller C&D Landfill will remain non-hazardous and non-putrescible waste building materials, packaging, and rubble resulting from construction, remodeling, repair, or demolition operations on pavements, houses, commercial buildings, and other structures. Such wastes include, but are not limited to, masonry materials, sheet rock, roofing waste, insulation, rebar, scrap metal, paving materials, and untreated wood products. The service area for the Esfeller C&D Landfill will remain Mobile County, Alabama. The maximum average daily volume of waste disposed at the Esfeller C&D Landfill will remain 500 tons per day.

The landfill is described as being located in part of the Southeast ¼ of Section 18 and the Southwest ¼ of Section 17, Township 6 South, Range 2 West in Mobile County, Alabama. The permitted facility consists of 132.37 acres with 92.4 acres permitted for disposal operations.

The Land Division has determined that the permit renewal and minor modification application complies with the requirements of ADEM Admin. Code Division 335-13 regulations.

Technical Contact:

Dr. Dontavious Sippial
Solid Waste Engineering Section
Land Division
(334) 270-5651

Alabama Department of Environmental Management

SOLID WASTE DISPOSAL FACILITY PERMIT

PERMITTEE:	**Esfeller C&D Recycling, LLC**
FACILITY NAME:	**Esfeller C&D Landfill**
FACILITY LOCATION:	**Southeast ¼ of Section 18 and Southwest ¼ of Section 17, Township 6 South, Range 2 West in Mobile County, Alabama. The total permitted area is 132.37 acres with a disposal area of 92.4 acres.**
PERMIT NUMBER:	**49-34**
PERMIT TYPE:	**Construction/Demolition (C/D) Landfill**
WASTE APPROVED FOR DISPOSAL:	**Non-hazardous and non-putrescible waste building materials, packaging, and rubble resulting from construction, remodeling, repair, or demolition operations on pavements, houses, commercial buildings, and other structures. Such wastes include, but are not limited to, masonry materials, sheet rock, roofing waste, insulation, rebar, scrap metal, paving materials, and untreated wood products.**
APPROVED WASTE VOLUME:	**Maximum Daily Volume of 500 tons per day**
APPROVED SERVICE AREA:	**Mobile County, Alabama**

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

ISSUANCE DATE:	**XXXXXX, 2026**
EFFECTIVE DATE:	**XXXXXX, 2026**
EXPIRATION DATE:	**XXXXXX, 2036**

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Alabama Department of Environmental Management

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
SOLID WASTE PERMIT

Permittee:	Esfeller C&D Recycling, LLC 8230 Padgett Switch Road Irvington, AL 36544
Landfill Name:	Esfeller C&D Landfill
Landfill Location:	Southeast ¼ of Section 18 and Southwest ¼ of Section 17, Township 6 South, Range West in Mobile County, Alabama. The total permitted area is 132.37 acres with a disposal area of 92.4 acres
Permit Number:	49-34
Landfill Type:	Construction and Demolition Landfill

Pursuant to the Solid Wastes & Recyclable Materials Management Act, Code of Alabama 1975, §§22-27-1, *et seq*., as amended (the "Act"), and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM), this permit is issued to Esfeller C&D Recycling, LLC (hereinafter called the Permittee), to operate a solid waste disposal facility, known as the Esfeller C&D 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 ADEM on October 24, 2022, for permit renewal, and May 12, 2023, for permit 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 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 **XXX XX, 2026** and shall remain in effect until **XXX XX, 2036**, 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 Administrative Code, Division 13. Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Except for actions brought under Code of Alabama 1975, Section 22-27-1, *et seq*., as amended, compliance with the conditions of this permit shall be deemed to be compliance with applicable requirements in effect as of the date of issuance of this permit and any future revisions.

B. Permit Actions. This permit may be suspended, revoked or modified for cause. The filing of a request for a permit modification or the notification of planned changes or anticipated noncompliance on the part of the Permittee, and the suspension or revocation does not stay the applicability or enforceability of any permit condition.

C. Severability. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

D. Definitions. For the purpose of this permit, terms used herein shall have the same meaning as those in ADEM Administrative Code, Division 13, unless this permit specifically provides otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

1. "EPA" for purposes of this permit means the United States Environmental Protection Agency.

2. "Permit Application" for the purposes of this permit, means all permit application forms, design plans, operational plans, closure plans, technical data, reports, specifications, plats, geological and hydrological reports, and other materials which are submitted to the Department in pursuit of a solid waste disposal permit.

E. Duties and Requirements.

1. Duty to Comply. The Permittee must comply with all conditions of this permit except to the extent and for the duration such noncompliance is authorized by a variance granted by the Department. Any permit noncompliance constitutes a violation of Code of Alabama 1975, Section 22-27-1 *et seq*., as amended, and is grounds for enforcement action, permit suspension, revocation, modification, and/or denial of a permit renewal application.

2. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit. The renewal application must be submitted to the Department at least 180 days before this permit expires.

3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application as required by Section I, Paragraph E, Subparagraph 2, and, through no fault of the Permittee, the Department has not made a final decision regarding the renewal application.

4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.

5. Duty to Mitigate. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

6. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit.

7. Duty to Provide Information. If requested, the Permittee shall furnish to ADEM, within a reasonable time, any information that ADEM may reasonably need to determine whether cause exists for denying, suspending, revoking, or modifying this permit, or to determine compliance with this permit. If requested, the Permittee shall also furnish the Department with copies of records kept as a requirement of this permit.

8. Inspection and Entry. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the employees of the Department or their authorized representative to:

   a. Enter at reasonable times the Permittee's premises where the regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.

   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

   c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.

   d. Sample or monitor, at reasonable times, any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by Code of Alabama 1975, Section 22-27-1 *et seq*.

9. Monitoring, Corrective Actions, and Records.

   a. Samples and measurements taken for the purpose of monitoring or corrective action shall be representative of the monitored activity. The methods used to obtain representative samples to be analyzed must be the appropriate method from ADEM Admin. Code 335-13-4 or the methods as specified in the Application and incorporated by reference. Laboratory methods must be those specified in Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), other appropriate EPA methods, or as specified in the Application. All field tests must be conducted using approved EPA test kits and procedures.

   b. The Permittee shall retain records, at the location specified in Section I, Paragraph I, of all monitoring, or corrective action information, including all calibration and maintenance records, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record or for periods elsewhere specified in this permit. These periods may be extended by the request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

   c. Records of monitoring and corrective action information shall include:

      i. The exact place, date, and time of sampling or measurement.

      ii. The individual(s) and company who performed the sampling or measurements.

      iii. The date(s) analyses were performed.

      iv. The individual(s) and company who performed the analyses.

v. The analytical techniques or methods used.

vi. The results of such analyses.

d. The Permittee shall submit all monitoring and corrective action results at the interval specified elsewhere in this permit.

10. Reporting Planned Changes. The Permittee shall notify the Department, in the form of a request for permit modification, at least 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 of 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.,I. The operating record shall include:

a. Documentation of inspection and maintenance activities.

b. Daily Volume reports.

c. Personnel training documents and records.

d. Solid/Hazardous Waste Determination Forms for Industrial Wastes, and associated ADEM disposal approval correspondence for industrial waste and special waste.

e. Groundwater monitoring records.

f. Explosive gas monitoring records.

g. Surface water and leachate monitoring records.

h. Copies of this Permit and the Application.

i. Copies of all variances granted by ADEM, including copies of all approvals of special operating conditions.

2. Quarterly Volume Report. Beginning with the effective date of this permit, the Permittee shall submit, within thirty (30) days after the end of each calendar quarter, a report summarizing the daily waste receipts for the previous (just ended) quarter. Copies of the quarterly reports shall be maintained in the operating record.

3. Monitoring and Corrective Action Reports. The Permittee shall submit reports on all monitoring and corrective 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 ADEM, and the reports shall be submitted at least semi-annually, or as directed by ADEM. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. Explosive gas monitoring must be submitted once each year, and the reports should be submitted to ADEM and placed in the operating record within 30 days of the monitoring event. Copies of the groundwater and explosive gas monitoring reports shall be maintained in the operating record.

4. Availability, Retention, and Disposition of Records.

a. All records, including plans, required under this permit or 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 ADEM.

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 ADEM.

c. A copy of records of waste disposal locations and quantities must be submitted to ADEM and local land authority upon closure of the facility.

I. Documents to be Maintained by the Permittee. The Permittee shall maintain, at the Esfeller C&D Landfill office, the following documents and amendments, revisions and modifications to these documents until an engineer certifies closure.

1. Operating record.

2. Closure Plan.

J. Mailing Location. All reports, notifications, or other submissions which are required by this permit should be sent via signed mail (i.e. certified mail, express mail delivery service, etc.) or hand delivered to:

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

2. Physical Address.
Chief, Solid Waste Branch
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, Alabama 36110-2400

K. Signatory Requirement. All applications, reports or information required by this permit, or otherwise submitted to ADEM, shall be signed and certified by the owner as follows:

1. If an individual, by the applicant.

2. If a city, county, or other municipality or governmental entity, by the ranking elected official, or by a duly authorized representative of that person.

3. If a corporation, organization, or other legal entity, by a principal executive officer, of at least the level of Vice President, or by a duly authorized representative of that person.

L. Confidential Information. The Permittee may claim information submitted as confidential pursuant to ADEM Admin. Code 335-1-1-.06.

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 ADEM and other appropriate agencies. A burn request should be submitted in writing to ADEM outlining why that burn request should be granted. This request should include, but not be limited to, specifically what areas will be utilized, types of waste to be burned, the projected starting and completion dates for the project, and the projected days and hours of operation. The approval, if granted, shall be included in the operating record.

C. Prevention of Unauthorized Disposal. The Permittee shall follow the approved procedures as provided in the Application, for detecting and preventing the disposal of free liquids, regulated hazardous waste, regulated PCB waste, regulated 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 not dispose of industrial process waste at this landfill. Only those wastes shown in Section III, Paragraph B are allowed for disposal in this landfill.

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 C/D LANDFILLS

A. Waste Identification and Management.

1. Subject to the terms of this permit, the Permittee may dispose of the nonhazardous solid wastes listed in Section III, Paragraph B. Disposal of any other wastes is prohibited, except waste granted a temporary or one time waiver by the Director.

2. The total permitted area for the Esfeller C&D Landfill is approximately 132.37 acres, with 92.4 acres approved for disposal.

3. The maximum average daily volume of waste disposed at the facility, as contained in the permit application, shall not exceed 500 tons per day. Should the average daily volume exceed this value by 20% or 100 tons/day, whichever is less, for two (2) consecutive quarters the permittee shall be required to modify the permit in accordance with ADEM Admin. Code 335-13-5-.06(2)(b)2. 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 and non-putrescible waste building materials, packaging, and rubble resulting from construction, remodeling, repair, or demolition operations on pavements, houses, commercial buildings, and other structures. Such wastes include, but are not limited to, masonry materials, sheet rock, roofing waste, insulation, rebar, scrap metal, paving materials, and untreated wood products.

C. Service Area. The Permittee is allowed to receive waste for disposal from Mobile County, 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 spread to a depth not exceeding two feet prior to compaction, and such compaction shall be accomplished on a face slope not to exceed 4 to 1 (25%) or as otherwise approved by ADEM. 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 ADEM and listed in Section VIII shall be added at the conclusion of each week's operation. These are minimum requirements for waste placement, compaction, and cover unless a variance is granted in Section VIII.

E. Liner Requirements. At this time, the Permittee shall not be required to install a liner system. The bottom of the construction and demolition waste shall be a minimum of five (5) feet above the highest measured groundwater level as determined by ADEM Admin. Code 335-13-4-.11(2)(a).

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 ADEM.

N. Other Requirements. ADEM may enhance or reduce any requirements for operating and maintaining the landfill as deemed necessary by the Land Division.

O. Other Permits. The Permittee shall operate the landfill according to this and any other applicable permits.

P. Scavenging and Salvaging Operations. The Permittee shall prevent scavenging and salvaging operations, except as part of a controlled recycling effort. Any recycling operation must be in accordance with plans submitted and approved by ADEM.

Q. Signs. If the landfill is available to the public or commercial haulers, the Permittee shall provide a sign outlining instructions for use of the site. The sign shall be posted and have the information required by 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:

Groundwater monitoring is not being required at this landfill provided that the waste stream is in accordance with Section III, Paragraph B. Should any waste be disposed other than the waste streams indicated in Section III, Paragraph B, the Department may require that groundwater-monitoring wells be installed.

SECTION V. GAS MONITORING REQUIREMENTS

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

SECTION VI. SURFACE WATER MANAGEMENT

The permittee shall construct and maintain run-on and run-off control structures. Any discharges from drainage control structures shall be permitted through a discharge permit issued by the ADEM Water Division.

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.

B. Vegetative Cover. The Permittee shall establish a vegetative or other appropriate cover, as approved by the Department, within 90 days after completion of final grading requirements in the Application. Preparation of a vegetative cover shall include, but not be limited to, the placement of seed, fertilizer, mulch, and water.

C. Notice of Intent. The Permittee shall place in the operating record and notify ADEM of their intent to close the landfill prior to beginning closure.

D. Completion of Closure Activities. The Permittee must complete closure activities of each landfill unit in accordance with the Closure Plan within 180 days of the last known receipt of waste.

E. Certification of Closure. Following closure of each unit, the Permittee must submit to ADEM a certification, signed by 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. ADEM 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 ADEM. Monitoring requirements shall continue throughout the post closure period as determined by ADEM unless all waste is removed and no unpermitted discharge to waters of the State have occurred.

H. Post-Closure Use of Property. The Permittee shall ensure that post closure use of the property never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area.

I. Certification of Post-Closure. Following post-closure of each unit, the Permittee must submit to ADEM a certification, signed by a registered professional engineer, verifying the post-closure has been completed according to the Post-Closure Plan.

J. Recording Instrument. 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 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 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 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 ADEM.

SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

1. The Permittee conducts recycling activities as described in the Operations Plan.

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 APPLICATION

SOUTHERN EARTH SCIENCES
Geotechnical | Environmental | Materials Testing

MOBILE OFFICE
5460 Rangeline Road
Mobile, AL 36619

Tel: (251) 344-7711
Fax: (251) 443-9000
www.soearth.com

May 12, 2023

Mr. Blake Holden
Alabama Department of Environmental Management
Solid Waste Division
P.O. Box 301463
Montgomery, AL 36130-1463

Re: Additional Information/Modification Request
Esfeller C&D Landfill Permit Renewal
Padgett Switch Road
Irvington, Alabama
Permit No. 49-34

Dear Mr. Holden:

On behalf of Esfeller C&D Recycling, Southern Earth Sciences has prepared an information list detailing documents relevant to the current permit renewal of the above referenced facility. Relevant documents and information are listed/referenced below:

- There are currently no current variances for Esfeller C&D Landfill. We are including a modification to change from single disposal cell to multiple cells. The current disposal will occur in Cell 1 (attached).

- The original local approval documentation can be found on eFile under Land Media Area and document name 48490 49-34 097 03-15-2018 PERM PJL Public Hearing Record. Additionally, please see the attached updated letter (attached) received from the Host Community indicating acceptance of the facility on February 10, 2016. As part of the Certification of Cell 1, the Alabama Department of Environmental Management requested contacting of the host community to determine input on the certification and modification to a multicell disposal facility.

- As of October 2022, there are no pending siting requests and/or approvals relevant to current operations at the facility. We are including an enclosed modification detailing the certification and demarcation of disposal Cell No. 1. The original facility was approved for a single cell of approximately 92.4 acres.

- Information about the hydrogeological evaluation relevant to current operations can be found in the original permit. Information related to the boundary plat and legal property description prepared, signed, and sealed by a land surveyor of the permitted facility boundary and permitted disposal area of the facility can be found in the initial permit. Stormwater runoff calculations used to size sediment ponds

relevant to current operations can be found in the original permit available on ADEM eFile.

- The liner and leachate QA/QC plan relevant to current operations and statement of where the leachate goes after it leaves the facility is non-applicable to Construction and Demolition (C&D) Landfills.

- There are no changes or modifications made to most recent operations plan since the last operations plan was written, including waste screening procedures. Operations will continue. The limits of Cell 1 are marked with stakes within the permit area.

- There are no changes or modifications made to the initial permit for gas monitoring plan since the last gas monitoring plan was written. Gas monitoring at the facility is conducted annually. There are no changes or modifications made to the most recent groundwater monitoring plan since the last groundwater monitoring plan. Groundwater monitoring is not required at the facility.
-
- There are no changes or modifications made to the most recent closure plan since the last closure plan was written. The facility began operations in 2018 and it is anticipated lifecycle of Cell 1 to continue into the next permit period.

- The facility is including a modification to include the certification of Cell 1 and limits for Cell 1. The facility will propose and construct additional cells within the permitted area (92.4 acres) as required. Additional cells will be presented in future modifications to the existing permit. The Cell 1 certification is attached.

Should have any questions or comments, you may reach the undersigned at 251-344-7711 or via electronic mail to eguarino@soearth.com

Sincerely,

SOUTHERN EARTH SCIENCES, INC.

Eric A. Guarino, P.G.
Registered, Alabama
No. 1101

and

Horacio Martinez
Staff Geologist

MOBILE COUNTY COMMISSION

COUNTY COMMISSIONERS
CONNIE HUDSON, PRESIDENT
RANDALL DUEITT, COMMISSIONER
MERCERIA LUDGOOD, COMMISSIONER
TELEPHONE (251) 574-5077

ADMINISTRATION
GLENN L. HODGE
COUNTY ADMINISTRATOR
EDDIE KERR
DEPUTY ADMINISTRATOR
TELEPHONE (251) 574-5073
FAX (251) 574-5080

March 31, 2023

To whom it may concern,

On September 18, 2015 Esfeller Construction submitted an application for Host Community Acceptance for the proposed construction of a construction and demolition landfill in Mobile County. The Mobile County Commission voted to approve Esfeller Construction's request for Host Community Acceptance on February 10, 2016 at their regularly scheduled meeting.

Sincerely,

Tina Sanchez
Environmental Services Director

Cc: File

HMR
HUTCHINSON, MOORE & RAUCH, LLC
Post Office Box 1127
Daphne, Alabama 36526
Telephone: (251) 626-2626
Fax: (251) 626-6934

September 18, 2015

Mobile County Commission
Mr. Jerry Carl, Commission President
205 Government Plaza
Mobile, Alabama 36644

RE: Host Community Approval
Proposed Esfeller C&D Landfill

Dear Commissioner Carl:

On behalf of Esfeller C&D and Recycling, LLC (Esfeller), Hutchinson, Moore & Rauch, LLC (HMR), acting as Esfeller's authorized agent, submits this formal request for host community approval for the proposed Construction and Demolition (C&D) landfill described in the attached application. Esfeller proposes to locate a C&D only landfill at the site of a former dirt pit within the legal boundaries of unincorporated Mobile County. We respectfully submit the attached application and pertinent attachments and ask that the Mobile County Commission grant host community approval to the proposed C&D Landfill as is required by both the currently effective Mobile County Solid Waste Management Plan and State Law. Should you have any questions, feel free to contact us. Thank you.

Respectfully,

HUTCHINSON, MOORE, & RAUCH, LLC

Robert A. Cummings, P.E.
Project Manager
E00201407616.091

Attachments

cc: Mobile County Attorney
Mr. Jay Ross
205 Government Street
Mobile, AL 36644

Mobile Co. Environmental Director
Mr. G. William Melton, P.E.
205 Government Street
Mobile, AL 36644-1600

MOBILE COUNTY SOLID WASTE DISPOSAL AUTHORITY

February 15, 2016

Ms. Patricia Esfeller
Esfeller C&D and Recycling, LLC
P.O. Box 114
Coden, AL 36523

Re: Esfeller C&D and Recycling, LLC
Mobile County Commission Approval
Host Community Acceptance

Dear Ms. Esfeller:

Please be advised that the Mobile County Commission has approved Host Community Acceptance for your landfill application. This Commission action was taken on February 10, 2016 at their regular scheduled meeting. Consider this correspondence as official notification of Host Community Acceptance.

Should you have any questions, please contact me at 574-3229.

Sincerely,

G. William Melton
Director

cc: Robert Cummings
Scott Hutchinson

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

The following application, with all required attachments, must be submitted before the Department will begin its review.

SECTION I:

LANDFILL ACTION:
_____ New Application
X Renewal Application, Permit Number 49-34
X Modification Application, Permit Number 49-34

LANDFILL NAME: Esfeller C & D Landfill

LANDFILL ADDRESS (MAILING): P.O. Box 114
Coden, AL 36524

LANDFILL ADDRESS (PHYSICAL): 8230 Padgett Switch Road
Irvington, AL 36544

SECTION II:

APPLICANT/PERMITTEE:

NAME: Esfeller C&D Recycling, LLC

ADDRESS: P.O. Box 114
Coden, AL 36524

TELEPHONE: 251-957-2210

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

SECTION III:

LANDFILL OPERATOR:

Name: (1) Esfeller C&D Recycling,LLC (2) _____

Address: P.O. Box 114

Coden, AL 36524

Telephone: 251-957-2210

SECTION IV:

CONTACT PERSON(S):

	(1)	(2)
Name:	Patricia Esfeller	David Esfeller
Address:	P.O. Box 114	PO Box 114
	Coden, AL 36524	Coden, AL 36524
Telephone:	251-957-2210	251-957-2210

SECTION V:

LANDOWNER(S):

Name: (1) Esfeller Construction Company, Inc. (2) _____

Address: P.O. Box 114

Coden, AL 36524

Telephone: 251-957-2210

Attach copy of agreement from landowner giving permission to use site for disposal if landowner is different from applicant.

SECTION VI:

ADJACENT LANDOWNER(S):

a. Submit a list of all adjacent landowners including name and current mailing address

b. Submit a drawing/map identifying the proposed disposal site and the properties of all adjacent landowners listed in "a" above.

SECTION VII:

LOCAL APPROVAL: Not Required — Required (Yes or No)

3/31/23 — Date Received if needed (attach copy of resolution and proof of publishing public notice)

SECTION VIII:

WASTE DESCRIPTION:

a. Describe and list all waste streams/types to be accepted at landfill:

Waste building materials, packaging & rubble resulting from construction, remodeling, repair or demolition operations on pavement, houses, commercial buildings, and other structures. Such wastes include but are not limited to masonry materials, sheet rock, roofing waste, insulation, rebar, scrap metal, paving material & wood products.

b. List proposed service area (geographic area or location(s)):

Mobile County, Alabama

c. What is the maximum daily volume of waste to be received at the landfill? (Select One)

500 tons per day _____ cubic yards per day

SECTION IX:

SITE DESCRIPTION:

a. Attach location map with the site clearly identified. Acceptable maps include a USGS 7.5 or 15 minute series, a county highway map published by the Alabama Department of Transportation.

b. Location:

County: Mobile

Part: SE 1/4 & SW 1/4 of Section(s): 18 & 17 respectively

Township(s): 6S Range(s): 2W

c. Attach legal property description and boundary plat of the permitted area and disposal area prepared and signed by a licensed land surveyor.

d. Size of permitted area: 132.37 acres

e. Size of disposal area: 92.4 acres

SECTION X:

This Section is to be completed by the applicants/permittees. A copy of all concurrence letters must be attached to this application upon submittal to the Department.

Location Standards: (Rule 335-13-4-.01(1)

a. Is the landfill located in the 100-year flood plain? (need to have flood plain map)
NO: ✓ YES: ____

b. Does the proposed landfill disposal area:

(1.) Jeopardize the continued existence of endangered or threatened species protected under the Endangered Species Act of 1973?
NO: ✓ YES: ___(Attach letter from U.S. Dept. of Interior or Alabama Fish and Wildlife)

(2.) Result in the destruction or adverse modification of critical habitats protected under the Endangered Species Act of 1973?
NO: ✓ YES: ___ (Attach letter from U.S. Dept. of Interior or Alabama Fish and Wildlife)

c. Is the proposed landfill located in a zone of active faults, seismic impact zones and unstable areas?
NO: ✓ YES: ____
(If YES then all required seismic studies should be submitted to the Department.)

d. Is the proposed landfill located in an area that is archaeologically sensitive?
NO: ✓ YES: ____ (Attach letter from State Historic Preservation Officer)

Water Quality Standards (Rule 335-13-4-.01(2):
(ADEM Water Division should be contacted to determine if permit is required)

a. Will the proposed landfill discharge pollutants to waters of the State in violation of requirements of the National Pollutant Discharge Elimination System (NPDES) Permit?
NO: ✓ YES: ____

b. Will the proposed landfill violate any requirement of an area wide or Statewide water quality plan that has been approved under the Alabama Water Pollution Control Act?
NO: ✓ YES: ____

c. Will any part of the landfill, including buffer zone, be located in wetlands, beaches, dunes?
NO: ✓ YES: ____

d. Will solid waste be disposed in any location which will significantly degrade wetlands, beaches, or dunes?

NO: ✓ YES: ____

e. Will the proposed landfill be located outside the boundaries of the coastal area? (If not, then all demonstrations should be submitted to the Department for review.)

NO: ____ YES: ✓

Groundwater Elevations:

Has a minimum five-foot separation between the floor of the disposal cell and the groundwater been established? NO: ____ YES: ✓

SECTION XI:

GENERAL COMMENTS:

All materials listed in Rules 335-13-4-.12 to 335-13-4-.17, Rules 335-13-4-.19 to 335-13-4-.20, and Rule 335-13-4-.23 shall be kept at the landfill office along with a copy of the engineering drawings which must be submitted to the Department for review.

The applicant/permittee is responsible for obtaining a copy of the Division 13 regulations and complying with all Rules related to construction/demolition landfill units.

SECTION XII:

CERTIFICATION OF LOCAL GOVERNMENT APPROVAL:

Upon submittal of this application, we the undersigned certify that local approval has been obtained from Mobile County Commission (city/county). Evidence of this local approval is contained in documents which are on file at the permit applicant's business address.

CERTIFICATION OF COMPLIANCE:

Upon submittal of this application, we the undersigned certify that this document and all attachments submitted are to the best of our knowledge and belief, true, accurate, and complete. We also understand that if any of the material certified to above has not been received, or is not complete or is not accurate, that shall be grounds for the Department to revoke the landfill permit if issued.

SIGNATURE (Responsible official of permit applicant):

_____ TITLE: _____

_____ DATE: _____

(please print or type name)

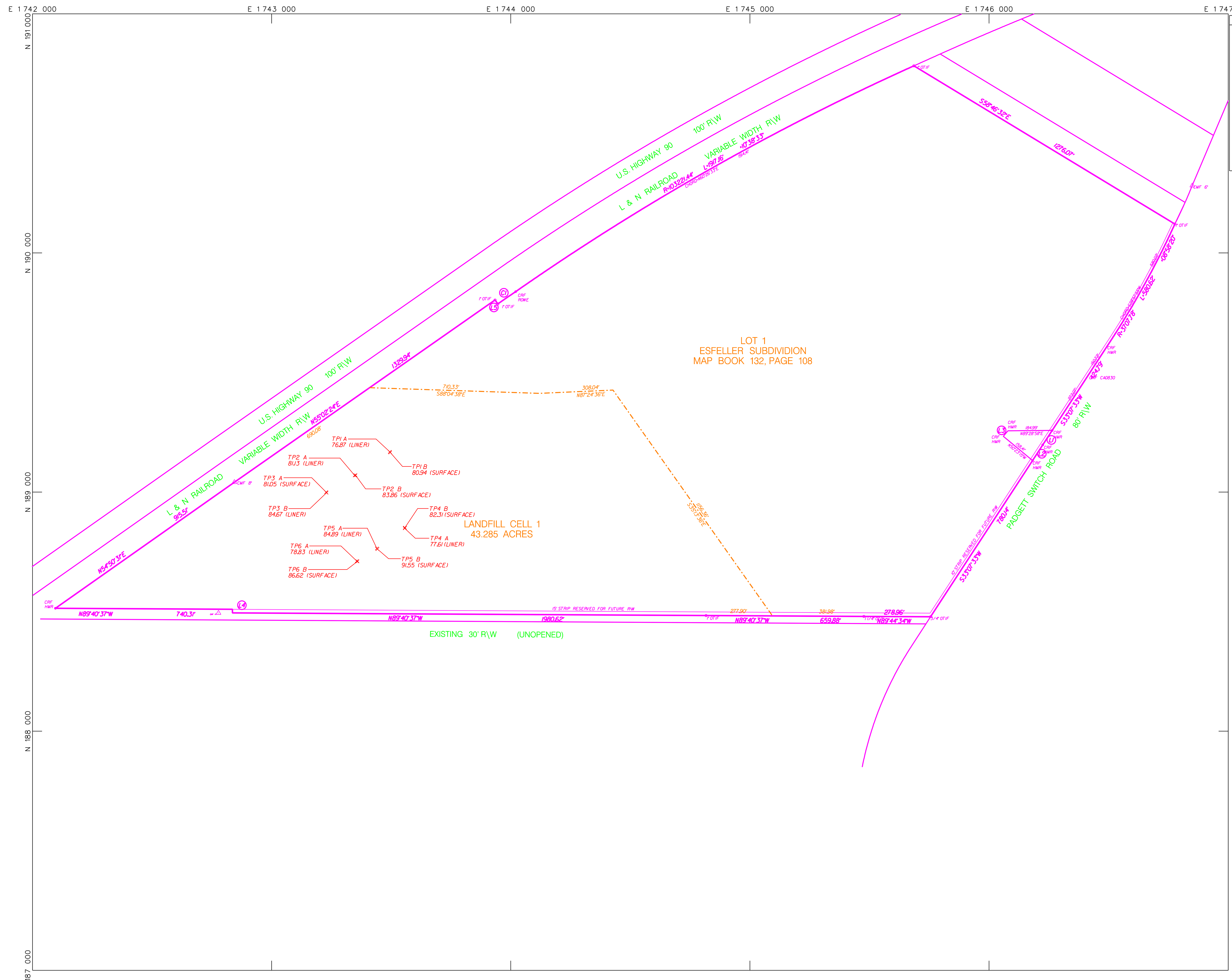
SIGNATURE (Certifying Engineer):

_____ TITLE: PRESIDENT

WILLIAM L COPELAND, JR. DATE: _____

(please print or type name)

FIRM: SOUTHERN EARTH SCIENCES, INC. STAMP OR SEAL:



LEGEND

CURB LINES		WATER VALVE		PARCEL BOUNDARY	
BURIED TELEPHONE	—T——T—	TELEPHONE BOX		ADJOINING PROPERT	
OVERHEAD LINES	-OHE——OHE—	UNKNOWN ELECTRICAL		SPOT ELEVATIONS	21.5
BURIED GAS LINE	— G — G —	STREET LIGHTS		INDEX CONTOURS	10
SANITARY SEWER		POLES		CONTOURS	
WATER MAINS	— W — W —	GUY ANCHORS		MONUMENTS	
FIRE WATER MAIN	—FW——FW—	TRANSFORMERS		IRON PINS & PIPES AS NOTED	
FENCES	—×—×—×—	CAMERA POLE		RCP=REINFORCED CONCRETE PIPE	
BUILDINGS		DITCHES		CMF=CONCRETE MONUMENT FOUND	
CULVERTS	=====	SIGNS		CRF=CAPPED REBAR FOUND	
CATCH BASINS		DECIDUOUS TREES		CRS=LAWLER 1/4" REBAR & CAP SET	
MAN HOLES		GATE VALVE		REC=DEED RECORD DIMENSION	
FIRE HYDRANT		HVAC UNIT		ACT=ACTUAL FIELD MEASUREMENT	
WATER METER		PIPE STUB		R/W=RIGHT OF WAY	
GAS METER		SANITARY CLEAN OUT		CMP=CORRUGATED METAL PIPE	
FIRE WATER HYDRANT		HANDICAP PARKING		CONC.=CONCRETE	
3" FLOOR DRAIN		ROOF DRAIN		X" DI=X" DUCTILE IRON PIPE	

CURVE	RADIUS	ARC LENGTH	DELTA	CHORD	
C1	11299.51	90.36'	00°27'29"	N55°31'45"E	90.36'

LINE	BEARING	DISTANCE
L1	S33°09'41"W	72.07'
L2	S33°05'34"W	78.12'
L3	N39°36'45"E	30.00'
L4	N00°19'23"E	15.00'
L5	S35°42'38"E	19.97'

TITLE NOTE:
THIS DRAWING DOES NOT REFLECT ANY TITLE OR EASEMENT RESEARCH OTHER THAN THAT VISIBLE ON THE GROUND OR FROM CLIENT'S CONVEYANCE.

GENERAL NOTES:
1000 FOOT GRID BASED ON ALABAMA STATE PLANE COORDINATE SYSTEM, WEST ZONE, NAD 83 (2011) ESTABLISHED ON SITE USING RTK GPS REFERENCING ALDOT CORS NETWORK.
ELEVATIONS BASED ON NAVD, 1988 REFERENCING ALDOT CORS NETWORK AND ESTABLISHED ON SITE WITH RTK GPS.
TOPOGRAPHIC DATA COLLECTED WITH LEICA TOTAL STATIONS
FIELD SURVEY COMPLETED 09 DECENBER, 2022
FILE:\dgn\BAYOULABATRE\ESFELLER\ 22146-LANDFILL-TESTPIT.DGN

CERTIFICATION:
I, W. J. LAWLER, III, A REGISTERED LAND SURVEYOR IN THE STATE OF ALABAMA HEREBY CERTIFY THAT ALL PARTS OF THIS SURVEY AND DRAWING HAVE BEEN COMPLETED IN ACCORDANCE WITH THE CURRENT REQUIREMENTS OF THE STANDARDS OF PRACTICE FOR LAND SURVEYING IN THE STATE OF ALABAMA TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

THIS THE 03RD DAY OF FEBRUARY, 2023

W. J. LAWLER, III PLS 17513

-N-

200 0 200 400 600
SCALE IN FEET

REVISIONS

01	2-28-23	ADD LANDFILL CELL No. 1 BOUNDARY

ALABAMA REGISTERED No. 17513 PROFESSIONAL LAND SURVEYOR W. J. LAWLER III
NOT VALID WITHOUT ORIGINAL RAISED SEAL

LAWLER AND COMPANY
LAND AND INDUSTRIAL SURVEYORS
2879 CLAUDIA LANE
THEODORE, ALABAMA 36590
(251) 661-9411 FAX (251) 661-9177

ESFELLER CONSTRUCTION
INDUSTRIAL LANDFILL TEST PIT SURVEY

REF:	ESFELLER CONSTRUCTION--DAVID ESFELLER	
DATE: 03 FEB, 2023	SCALE: 1"=200'	SHEET 01 OF 01
PROJ. NO. 22-146		DWG. No. 22-146-1

Disposal Cell Certification Report
Construction and Demolition Disposal Cell 1
Esfeller C&D Landfill
Mobile County, Alabama
Permit No. 49-34

Prepared For:

Esfeller Construction Company, Inc.
8230 Padgett Switch Road
Irvington, AL 36544

Prepared by:
Patrick Chumbley, PE
LPC Technologies
5184 Caldwell Mill Road, Suite 204
Birmingham, AL 35244

February 7, 2023

Disposal Cell Certification Report
Construction and Demolition Disposal Cell 1

Esfeller C&D Landfill
Irvington, Alabama
February 7, 2023

1.0 INTRODUCTION

This report documents the activities conducted and performed by LPC Technologies and the Esfeller C&D Landfill to prepare a certification for the existing disposal cell 1 that has been in use for several years following its initial construction in about late 2017. The design base grade elevations of the landfill were developed to maintain a five foot elevation separation (buffer) between the seasonal high groundwater level and the waste. The Esfeller C&D Landfill was previously a soil borrow pit (dirt pit). In order to achieve that design base grade elevation, soil fill was needed to be place in the pit to raise the elevation of the cell floor to the design base grade elevation.

The primary approach to preparing this certification was to excavate test pits through the in-situ waste down to the interface between the waste and the soil subgrade (cell floor base grade). Upon reaching the existing base grade elevations, a survey crew then measured the elevation of the waste/soil interface and collected the location of the pit within the landfill site using instrumentation tied to the State Plane Coordinate system of horizontal control.

2.0 FIELD PROCEDURE

The test pit investigation, as described above, was conducted on December 7, 2022 under partly cloudy skies and an air temperature of 82°, by the following entities and individuals:

Landfill Operator: Esfeller Construction, Irvington, AL

Certifying Engineer: Patrick Chumbley PE, LPC Technologies, Birmingham, AL

Surveyors:
Johnny Peacock and Andrew Lawler
Lawler and Company, Inc.
Theodore, AL 36590

The investigation began when Mr. Chumbley directed the track hoe operator, supplied by Esfeller Construction to a randomly chosen location within Cell 1 where Chumbley instructed the operator to begin excavating within the waste after stripping off the soil cover layer. The operator (Jimmy) was told to continue excavating until the lower limits of waste was found and soil was visible at the bottom of the pit and then to stop.

Upon reaching the soil layer, Mr. Chumbley then instructed to survey crew from Lawler and Company to collect the elevation of the top and bottom of the pit with the pole mounted “rover” GPS survey device. The rover functions by locating itself vertically and horizontally with respect to an on-site “base” unit which is set-up at the site over a fixed benchmark of known horizontal

location with respect to the State Plane coordinate system available as a satellite GPS signal and vertical elevation with respect to a USGS benchmark. The rover was lowered into the pit using the long pole and extension pieces when needed until the lower tip was resting on the soil in the bottom of the pit.

In general the waste flagging from the side walls of the excavation was all construction and demolition wastes with a blackish color. When the surveyors finished collecting their data, the pit was backfilled with the wastes that had been excavated and then covered with soil. The same procedure was then repeated for five more pits.

3.0 INTERPRETATION AND REDUCTION OF FIELD DATA

The locations of all six test pits were plotted on CAD design/permit drawing for the site within Cell 1. The elevation data of the bottoms of the pits was plotted against the design cell floor (base grade) elevations and compared to ensure that bottom of the pit did not violate (go deeper) than the design base grade. The data for all six pits is as follows:

TEST PIT NUMBER (TP)	TOP ELEVATION (FT ABOVE MSL)	BOTTOM ELEVATION (FT ABOVE MSL)	DESIGN BASE GRADE ELEV.	DIFFERENCE (ft) (+) OR (-)
1	80.92	76.86	74.95	+1.91
2	83.86	81.12	75.2	+5.92
3	84.67	81.06	75.6	+5.46
4	83.21	77.61	75.4	+2.21
5	91.55	84.89	75.9	+8.99
6	86.62	78.86	76.5	+2.36

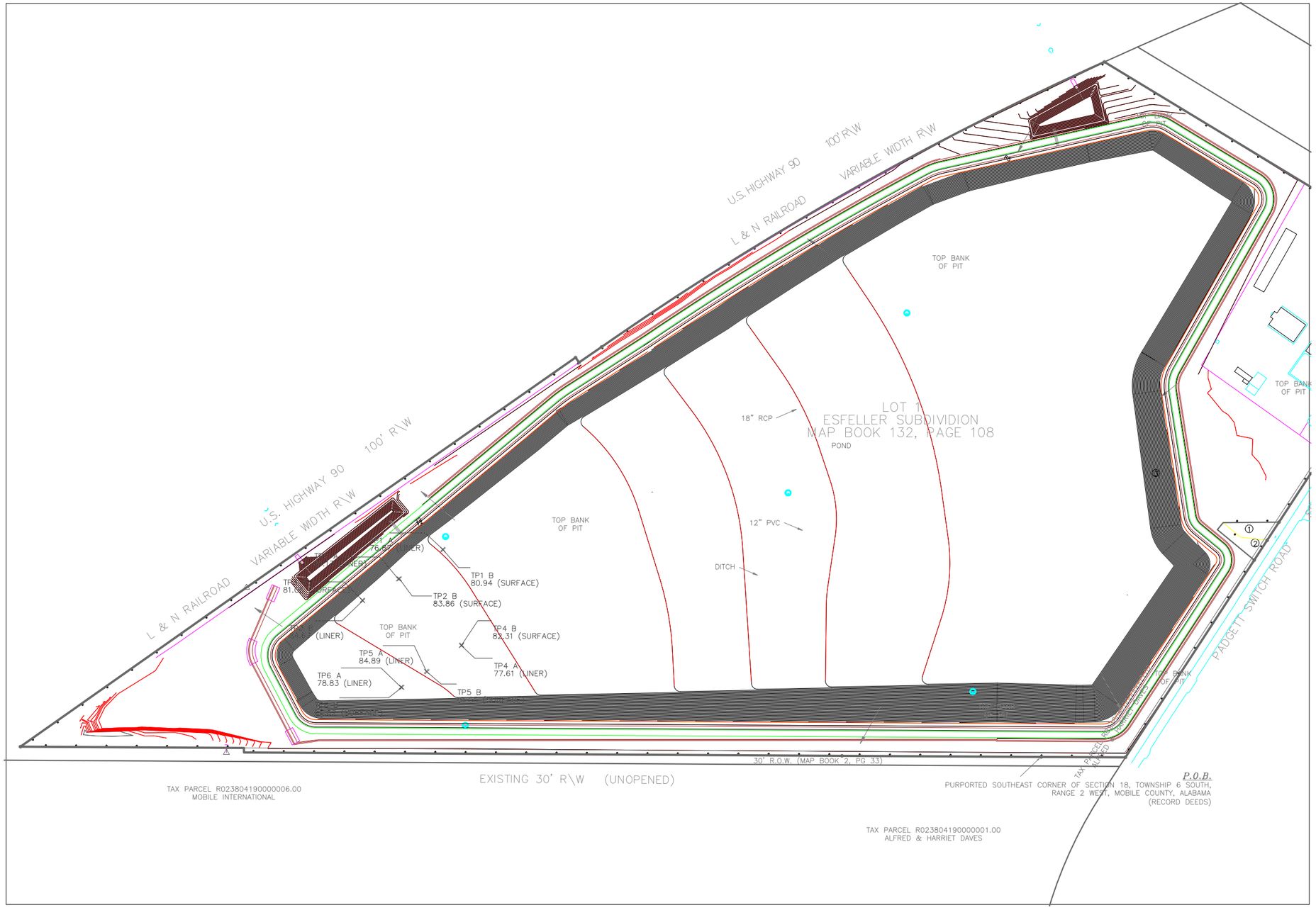
4.0 CONCLUSIONS AND CERTIFICATION

The above table demonstrates that as-built base grades are above the design base grades in all locations sampled. Therefore, I conclude that Cell 1 was built in general conformance with the permit plans and specifications.

Respectfully Submitted,

Patrick Chumbley, PE
Registration 19181

Attachments: Exhibit 1-Test Pits Locations Plan



Notes:

REV:	DESCRIPTION:	BY:	DATE:
STATUS:			

TEST PIT LOCATIONS PLAN

CLIENT:
ESFELLER C&D LANDFILL

ENGINEER
LPC TECHNOLOGIES
5184 CALDWELL MILL RD., STE 204
BIRMINGHAM, AL 35244

SITE:
ESFELLER C&D LANDFILL
IRVINGTON, AL

TITLE:
EXHBIT 1

SCALE:	DATE:	DRAWN:	CHECKED:
N.T.S	2/7/23	PC	
PROJECT NO:	DRAWING NO:		REVISION:
202-11	EXHBT-01		

Jeffery W. Kitchens
Acting Director

Kay Ivey
Governor

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

July 28, 2025

Ms. Patricia Esfeller
Esfeller C&D Recycling, LLC
P.O. Box 114
Coden, AL 36524

RE: Cell 1 Inspection

Dear Ms. Esfeller:

On July 17, 2025, Ms. Stacy Stevens of the Alabama Department of Environmental Management performed a post-construction inspection of Cell 1 at the referenced landfill. During the inspection, it was observed that waste had been disposed of in the cell, despite the cell not yet having received departmental approval for use. To address this issue, six test pits were excavated through the in-situ waste. A registered professional engineer confirmed that the cell floor base grade was constructed according to the original approved design specifications. Based on the visual inspection of Cell 1 and the engineer certification received on February 7th, 2023, the Department has determined that the construction and demolition waste cell is in compliance with all requirements and conditions of the permit and disposal activities may commence.

If you should have any questions, please contact Stacy Stevens of the Solid Waste Engineering Section at (334) 274-4248.

Sincerely,

Jared Kelly, Chief
Solid Waste Engineering Section
Land Division

JK/sms

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

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

Coastal Office
1615 South Broad Street
Mobile, AL 36605
(251) 450-3400
(251) 479-2593 (FAX)

ESFELLER C&D LANDFILL

OPERATIONS PLAN

PERMIT NUMBER 49-34

REVISED AUGUST 2025

ESFELLER C&D LANDFILL

OPERATIONS PLAN

1.0 INTRODUCTION

1.1 PURPOSE AND SCOPE

In recognition of the need to provide for proper disposal of waste generated in Mobile County, Alabama, Esfeller C&D and Recycling is operating the Esfeller C&D Landfill for the disposal of yard waste, demolition material, construction debris, rubbish and like materials which do not contain household garbage or other putrescible waste. The purpose of this manual is to provide guidelines for properly operating and maintaining the new 92.9-acre facility. The procedures set forth herein comprise a plan for the orderly use of the facility while protecting the environment.

To this end, the Esfeller C&D Landfill will cover a total of 132.37 acres of land area but accounting for perimeter buffers and the necessary drainage work as well as leaving space for the gas monitoring wells, the actual disposal area available to the owner is 92.9 acres. Additionally, the intended service coverage area is intended to be the greater Mobile County area as the need for a C&D Landfill is evident especially for hurricane debris disposal in the south Alabama area.

The Landfill is managed by Esfeller C&D Landfill and Recycling, LLC, an independent limited liability company in the State of Alabama. Esfeller C&D Landfill and Recycling, LLC will operate with trained personnel available for this purpose.

Where appropriate, descriptions of landfill features have been provided to give a clear understanding of the operational objectives Personnel responsible for operating and maintaining the Landfill should be thoroughly familiar with this operational plan and related documents. This manual should be used in conjunction with the following documents, if required, including any future revisions thereto:

- ◊ Alabama Department of Environmental Management NPDES permit for Esfeller C&D Landfill, including all permit conditions and the Best Management Practices Plan.
- ◊ All Local, State and Federal rules and regulations governing solid waste disposal.

1.2 DEFINITIONS

For the purpose of this operational plan, the following words or phrases will have the meanings ascribed to them in this section unless the context indicates differently. Words or phrases not listed herein will have the meaning ascribed to them by Alabama Department of Environmental Management regulations governing solid waste management.

ACCEPTABLE WASTE - Waste that is acceptable for disposal at Esfeller C&D Landfill Such waste will include yard waste, demolition materials, construction debris, rubbish, and like materials which do not contain household garbage or other putrescible waste.

ESFELLER C&D LANDFILL - The landfill developed by Esfeller C&D and Recycling, LLC. for disposal of such material as yard waste, demolition material, construction debris, rubbish, and like materials which do not contain household garbage or other putrescible waste. Also may be referred to herein as the Landfill. The facility was formerly a dirt pit for Esfeller Construction and certain documentation may refer to the facility by this title.

BUFFER ZONE - An area, generally 100 feet in width, around the perimeter of Esfeller C&D Landfill in which no waste will be placed. It will serve as a protective barrier between the waste disposal area and surrounding property. Roads, drainage structures, personnel facilities, equipment facilities, and other landfill appurtenances may be located in the buffer zone.

BULK WASTE - Large items of refuse including, but not limited to, appliances, furniture, large auto parts, non-hazardous construction and demolition material, trees, branches, and stumps which cannot be handled by normal solid waste processes, collection or disposal methods.

COUNTY - Mobile County, Alabama, acting by and through its governing body, the Mobile County Commission

COMPOSTING - The controlled biological decomposition of organic solid waste under aerobic conditions.

CONSTRUCTION AND DEMOLITION WASTE - Materials resulting from construction, remodeling, repair, or demolition of buildings, bridges, pavement and other structures. Such waste includes, but is not limited to, bricks, concrete, other masonry materials, sheet rock, scrap metal, paving materials, and wood products, all being materials which constitute rubbish.

DEPARTMENT - Alabama Department of Environmental Management or any agents, boards or authorities appointed by them for the purpose of regulating the permitting, construction or operation of the solid waste disposal facility

DEPOSIT - Any money, bond, or other asset required by the County as security for payment to dispose of waste at the Landfill.

ENGINEER - Any registered professional engineer in the State of Alabama designated by the County to act as its representative.

HAULER - Any individual, firm, entity, or other party who collects solid waste for disposal at the Landfill. Hauler is not intended to include individuals who dispose of waste from their residence.

LANDFILL MANAGER - The individual(s) authorized by the County to be responsible for managing on-site operations of Esfeller C&D Landfill.

PERMIT - Solid waste disposal facility permit issued by ADEM for operation of Esfeller C&D Landfill.

SERVICE AREA - The geographical area which may be serviced by the landfill facility from which solid waste is generated and collected, including any interim points (i.e., transfer stations) at which solid waste is repacked or reloaded onto vehicles or other methods of transport for delivery to that facility. The service area of Esfeller C&D Landfill will be limited to Mobile County, Alabama, including all municipalities therein.

SPECIAL WASTE - Those wastes requiring specific processing, handling, or disposal techniques as determined necessary by facility practices or by Alabama Department of Environmental Management which are different from techniques normally utilized for handling and disposal.

TIPPING FEE - A rate per ton that will be charged for handling and disposal of waste at Esfeller C&D Landfill.

WHITE GOODS - Large household appliances such as refrigerators, stoves, air conditioners, etc.

WORKING FACE - That area of a landfill where active filling and compacting operations are being conducted.

YARD WASTE - Leaves, grass clippings, prunings, stumps, brush, and other natural organic matter discarded from yards and gardens

2.0 GENERAL INFORMATION

2.1 GENERAL SITE DESCRIPTION

The site is located in the southeast quadrant of Section 18, Township 6 South, Range 2 West and southwest quadrant of Section 17, Township 6 South, Range 2 West in Irvington Alabama, within the legal boundaries of unincorporated Mobile County. It is southeast of US Hwy 90, northwest of Padgett Switch Rd, and immediately adjacent to and southeast of the CSX railroad. There are no zoning or land use restrictions in the unincorporated portions of Mobile County.

Previous use of the existing site has predominately been as a construction borrow pit.

2.2 AVERAGE DAILY VOLUME

The permitted volume is 1,500 cubic yards per day of waste.

2.3 SERVICE AREA

The service area of Esfeller C&D Landfill is limited to Mobile County. It is not required that all acceptable waste generated or collected in the service area be accepted for disposal at the Landfill. Defining the service area only serves to limit the area the Landfill may serve. The County reserves the sole right to specify what waste from within the defined service area will be accepted at the site.

2.4 WASTE STREAM

A Waste building materials, packaging, and rubble resulting from construction, remodeling, repair, or demolition operations on pavements, houses, commercial buildings, and other structures. Such wastes include, but are not limited to, masonry materials, sheet rock, roofing waste, insulation, rebar, scrap metal, paving materials, rubbish and wood products.

B Clearing, landscaping, and storm debris.

C Solid waste generated by manufacturing processes that is not a hazardous waste and is not classified as industrial waste. No manufacturing waste will be disposed of at this facility without prior written approval from ADEM.

2.5 CONTACT PERSON

Owner, Esfeller C&D and Recycling, LLC
Attn: David Esfeller
P.O. Box 114
Coden, AL 36523
(251) 957-2210

3.0 SITING STANDARDS

3.1 FLOODPLAIN

The entirety of the site is located in unshaded floodzone "X" as areas outside the mapped five hundred year flood boundary. Therefore the facility has no chance, ability or capacity to restrict the flow of the base flood, reduce the temporary water storage capacity of the floodplain or result in a washout of solid waste by waters of the base flood, so as to pose a hazard to human health, wildlife, land or water resources.

3.2 ENDANGERED OR THREATENED SPECIES OR HABITAT

The site has been inspected by U.S. Fish and Wildlife Service to determine that development of the landfill will not have an adverse effect on endangered or threatened species or habitat. Written confirmation from U.S. Fish and Wildlife Service, concurring with the development of the Landfill, has been obtained.

3.3 AIRPORTS

The facility will not dispose of putrescible waste that may attract birds and therefore will not be operated in such a manner so as to pose a bird hazard to air traffic.

3.4 UNSTABLE AREAS

The site is not located in a zone of active faults, seismic impact zones, sinkholes or karst terrain**.**

3.5 ARCHEOLOGICAL OR HISTORICAL SIGNIFICANCE

The site has been surveyed to determine that no historically or archeologically sensitive areas are present. The Alabama Historical Commission (AHC) has reviewed the findings and concluded that development of the Landfill will have no adverse effect on cultural resources

3.6 SURFACE WATER

Discharge from the facility is designed to protect water quality and is conveyed through an NPDES General Stormwater Permit issued by ADEM's Water Division via ADEM Form 384. Detention ponds and rip-rap outfalls will be constructed so as not to cause discharge of pollutants into waters of the State or a non-point source of pollution. Best Management Practices that comply with NPDES guidelines will be used to manage stormwater discharged from the property. Unpermitted discharge to waters of the State will not be allowed.

Stormwater is managed by the use of permanent drainage structures such as terraces, ditches, and pipes. These are designed to intercept stormwater from disturbed areas of the site, direct it to the appropriate detention pond, and release the water across a rip-rap flume. Surface water is directed away from the working face of the Landfill. Currently all stormwater and surface water discharges to groundwater in an area outside of disposal Cell #1.

3.7 WETLANDS

No areas of natural wetlands are located within any portion of the site. No wetlands have been delineated by the U.S. Army Corps of Engineers on this site.

No loss of wetlands are anticipated for development of the Landfill. No activities are planned in wetlands nor placed near wetlands.

3.8 GROUNDWATER

A site-specific hydrogeological evaluation has been conducted by Southern Earth Sciences, Inc. on the new site. This investigation concluded that the site is hydrogeologically acceptable for development of a Landfill. A vertical separation of at least five (5') feet will be maintained between the seasonal high groundwater table and waste.

4.0 PLANS REQUIRED

4.1 ON-SITE CONTROL POINTS

On-site control points are provided to allow for accurate horizontal and vertical control for facility construction, operation, closure and post-closure.

4.2 GEOLOGIC AND HYDROGEOLOGIC UNITS

See Section 5 of this report.

4.3 BOUNDARY PLAT AND LEGAL PROPERTY DESCRIPTION

The boundary plat and legal property description are included in the Engineering Plans

4.4 INITIAL AND FINAL TOPOGRAPHICS

See Engineering Plans and revisions submitted as required by ADEM.

4.5 EXISTING AND PROPOSED SURFACE DRAINAGE

A pattern for drainage control structures has been provided in the Engineering Plans.

4.6 BUFFER ZONES

An area around the perimeter of the site is designated as the buffer zone for the Landfill. The buffer zone is at least one hundred (100') feet in width. Nothing other than clean fill will be placed within the designated buffer zone.

Roads, drainage structures, personnel facilities, equipment facilities, and other landfill appurtenances may be located in the buffer zone. Trees located in the buffer area will not be removed except as required for construction. A vegetative cover shall be maintained in the buffers to control erosion.

4.7 ACCESS ROADS

The site Is bounded on the east by Padgett Switch Road off of which access to the site shall be gained. Main access to the site is from an existing internal access driveway that enters the future landfill from the north. A permanent haul road with individual access from Padgett Switch Road is completed and will be paved and placed in service by 2026. This existing driveway is constructed of compacted natural soils. Wet weather conditions may also necessitate placement of crushed stone or gravel over certain portions of the haul roads to assure all- weather access to the working face. A stockpile of crushed stone or gravel may be maintained on-site for this purpose.

4.8 SUMMARY OF SITING STANDARDS

See Section 3 of this report.

4.9 DISPOSAL AREAS

Areas of the facility which have been used and are to be used for future disposal are shown in the Engineering Plans.

4.10 SPECIAL ENGINEERING FEATURES

There are no special engineering features or considerations proposed for this facility

4.11 QA/QC

The final cover will be constructed in accordance with the QA/QC Plan located in Appendix A.

4.12 EXPLOSIVE GAS MONITORING WELLS

Explosive gas monitoring well locations and details are shown in the Engineering Plans.

5.0 SITE GEOLOGY AND HYDROLOGY

Soils encountered on the site range from very coarse quartz sands to clayey-gravel. A detailed description of stratigraphic units and a hydrogeological evaluation of the existing 92.9-acre site can be found in the Hydrogeological Evaluation, (Southern Earth Sciences, Inc. dated July 7, 2015) which has been previously submitted to the Department. There is a sufficient volume of suitable on-site soils to provide weekly and final cover for the Landfill. Seasonal high groundwater beneath the entire site ranges from 62.59 MSL to 71.01 MSL. Groundwater flow is to the east-northeast across the existing site.

6.0 COVER

6.1 WEEKLY COVER

Waste will be covered a minimum of once each week to control disease vectors, fires, odors, blown litter and scavenging. The facility will use a minimum of six inches of compacted earth taken from areas on or adjacent to the facility or an ADEM approved alternate cover.

6.2 FINAL COVER

The QA/QC Plan for the final cover is located in Appendix A.

7.0 EXPLOSIVE GAS MONITORING PLAN

7.1 GENERAL

The movement of gases away from landfill sites can be a serious problem in many areas. During decomposition, organic wastes can produce explosive

gases, especially methane. Since the facility accepts organic waste, an explosive gas monitoring plan is deemed necessary.

Explosive gases are not to exceed the lower explosive limit (LEL) at the facility boundary. Explosive gases are not to exceed twenty-five (25%) percent of the LEL in facility structures except for gas control or recovery system components. The LEL of methane is five (5%) percent by volume in air.

Facility structures will be designed and constructed so as not to allow explosive gases to collect in, under or around structures in concentrations above the required limits. Gas monitoring equipment as required by ADEM will be provided at the facility by the landfill operator. Permanent gas monitoring wells are proposed for this facility

7.2 MONITORING AND REPORTING PROCEDURES

Explosive gas monitoring is conducted annually. All monitoring reports will be submitted to ADEM and placed in the facility's operating record within 30 days of the monitoring event. Levels of gas detected will be expressed in percent LEL and percent volume.

If explosive gas levels exceed the required concentration limits, the permittee will take the following actions:

1. Immediately take all necessary steps to protect human health and property and notify ADEM.

2. Within 7 days of detection, place in the facility's operating record the explosive gas levels detected and the immediate steps taken to protect human health and property.

3. Within 20 days of detection, submit to ADEM for approval a remedial plan for the explosive gas releases. This plan will describe the nature and extent of the problem and the proposed remedy. The plan will be implemented upon approval by ADEM, but within 60 days of detection. Also within 60 days of detection, a copy of the plan will be placed in the facility's operating record and ADEM notified that the plan has been implemented.

7.3 LOCATION OF MONITORING STATIONS

Monitoring stations are located every 50 feet along the facility's boundaries.

Monitoring will also be conducted in structures, culverts, inlets, and any other place that gas might accumulate.

A minimum depth of six feet will be used for permanent monitoring structures and four feet when using the bar hole punch method.

8.0 DRAINAGE CONTROL

Stormwater control at the facility is necessary to prevent erosion and sedimentation. Perimeter ditches will be constructed as necessary to direct all stormwater generated within the boundary of the landfill to the detention area. Details of the surface water drainage plan and discharge areas are shown in the Engineering Plans.

8.1 RUN-ON CONTROL

The permittee will maintain a run-on control system using grading and berms to prevent flow onto the active or closed portions of the landfill during the peak discharge from a 25-year, 24-hour storm event.

8.2 RUN-OFF CONTROL

The permittee will maintain a run-off control system using berms, ditches, terraces, detention ponds and rip-rap flumes or other control structures to collect and control at least the water volume resulting from a 25-year, 24-hour storm event. Run-off from the landfill will be conveyed through the landfill's NPDES Stormwater Permit discharge points. Temporary sediment control features such as intermediate grading and hay bale dams will be used as necessary to control sediment transport.

9.0 ACCESS

All waste coming to the facility will enter on an entrance driveway off of Padgett Switch Road. A ticket booth/guard shack is located near the Landfill entrance and vehicles will stop at the office upon entering the facility. Sufficient area is provided to allow space for several vehicles near the office facility.

9.1 AUTHORIZED PERSONNEL

Only persons authorized by the Landfill Manager will be permitted access to the site. No access will be permitted except when a Landfill attendant is on duty.

9.2 HAUL ROADS

Temporary haul roads will be utilized to deliver waste to the working face during the life of the landfill. Barricades or other directional indicators may be used as needed to provide safe and efficient access to the working face.

Traffic control and directional signs will be located near the entrance to the facility as required for safe operation.

9.3 PUBLIC ACCOMMODATION

The disposal area is open to the public and maintained to allow access to personal vehicles.

Landfill management may locate a container for household garbage within the facility for the convenience of the public. Such a container will be a sealed unit so that no liquid can leak out and with a cover that will be placed over the container when the facility is closed. Waste placed in the container will be transported to an approved MSWLF for disposal.

10.0 CLOSURE PLAN

10.1 GENERAL

This closure plan describes the steps that will be taken to properly close the facility upon reaching final elevations or at any point during the active life of the facility. The purpose of properly closing a landfill is to stop the infiltration of rainwater into the waste and to stop any further impacts the landfill may have on the environment.

10.2 FINAL COVER SYSTEM

REQUIREMENTS: A final cover system will be installed which is designed to minimize infiltration and erosion. The final cover system will be comprised of an erosion layer underlain by an infiltration layer. The erosion layer will be a minimum of 6 inches of earthen material that is capable of sustaining native plant growth. The infiltration layer will consist of 18 inches of compacted earthen material.

CONSTRUCTION: The landfill operator will select a source material that will be compacted to meet the requirements for the infiltration layer. The infiltration layer will be placed in layers of 4 to 6 inches and compacted. This will be repeated until the required 18 inches has been achieved. The landfill operator will then place a 6-inch layer of topsoil that is suitable for growing a vegetative cover. The final cover QA/QC Plan is located in Appendix A.

10.3 DESCRIPTION OF DISPOSAL AREA

The estimated largest area of the entire landfill site that would ever require a final cover is 92.9 acres. The estimated maximum inventory of waste to be on-site over the active life of the facility is approximately 5,708,466 cubic yards.

10.4 FINAL SOIL COVER GRADING

The final soil cover will be graded so that surface water does not pond over the facility. The maximum final grade will not exceed 25 percent. The minimum final grade will not be less than 5 percent. Slopes longer than 25 ft. will have 10 ft. wide terraces for every 20 ft. rise in elevation. Final grading will be completed within 90 days after the unit has received the last known receipt of waste unless an extension is received upon written request to the Alabama Department of Environmental Management.

10.5 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 species of grass seed, fertilizer, and mulch. The Soil

Conservation Service or the Alabama Department of Transportation will be contacted to obtain a suitable seasonal seed mixture for the facility. Watering and maintenance will be performed so that the germination of grass can be anticipated. There will be no use of deep-rooted vegetation. The final cover will be prepared for the vegetative cover within 90 days after final grading is completed, unless delayed by weather and seasonal conditions.

10.6 NOTICE OF INTENT

Prior to beginning closure of each landfill unit, the permittee will submit a "Notice Of Intent To Close" to ADEM. The permittee will also place this "Notice Of Intent To Close" in the operating record.

10.7 SCHEDULE FOR CLOSURE

The permittee will begin closure activities no later than 30 days after the last known receipt of waste. The permittee will complete closure activities in accordance with this plan within 180 days after the last known receipt of waste.

10.8 CLOSURE CERTIFICATION

Following the closure of the landfill, the permittee will submit a certification to ADEM that verifies that the landfill closure has been completed in accordance with this closure plan. A copy of this certification will be placed in the operating record. This certification will be signed by a registered professional engineer.

10.9 DEED NOTATION

Within 90 days after the closure requirements are completed, the permittee will record a notation onto the facility's land deed or some other legal instrument that is normally examined during a title search. This will notify any potential purchaser of the property that:

1. The land has been used as a solid waste disposal facility.

2. The use of the property will never be allowed to disturb the integrity of the final cover or the function of the monitoring systems, unless ADEM determines that the activities will not increase the potential threat to human health or the environment; or the activities are necessary to reduce the threat to human health or the environment.

3. The locations and dimensions of the facility with respect to permanently surveyed benchmarks and section corners will be on a plat prepared and sealed by a land surveyor.

4 The name of the permittee or the operating agency, the type of landfill unit and the beginning and closure dates of the disposal activity.

5 Certification has been made by an engineer or land surveyor that all closure requirements have been completed.

10.10 RECORDING INSTRUMENT

The permittee or land owner will submit a certified copy of the recording instrument to ADEM and place a copy in the facility's operating record within 120 days after permit expiration, revocation or as otherwise directed by ADEM.

10.11 FINAL CONTOUR AND DRAINAGE PLAN

A detailed design for the closure of the facility is located in the Engineering Plans.

11.0 POST-CLOSURE PLAN

11.1 GENERAL

Post-closure of the landfill unit begins when closure has taken place according to the approved closure plan and has been certified by a registered professional engineer. The primary purpose of post-closure monitoring is to maintain the integrity of the final cover and to monitor any groundwater or gas wells.

11.2 MAINTENANCE

The closed landfill will be inspected monthly to ensure the integrity of the final cover and monitoring equipment. Eroded areas and areas that allow for ponding of surface water will be filled with a suitable soil cover, compacted, graded and an appropriate vegetative cover established. Areas with extensive surface cracks will be corrected as necessary and an appropriate vegetative cover will be maintained at all times. Access to the closed facility will be restricted by the previously noted structures. If these access control structures fail to be effective, new structures will be erected. Signs will be posted stating that the facility is closed and giving the location of the nearest permitted solid waste disposal facility. Any waste dumped at the closed facility will be removed and taken to an approved solid waste disposal facility. Monitoring devices and pollution control equipment will be maintained. Other problems such as vector control will be corrected.

11.3 LENGTH OF POST-CLOSURE CARE PERIOD

The length of the post-closure care period will be a minimum of 30 years.

11.4 POST-CLOSURE CONTACT PERSON

Owner, Esfeller C&D and Recycling, LLC
P.O. Box 114
Coden, AL 36523
(251) 957-2210

11.5 POST-CLOSURE USE OF PROPERTY

There is no planned use of the closed facility. However, if use for the property is proposed, the use will not be allowed to disturb the integrity of the final cover, any other component of the containment system, or the function of any monitoring systems unless approved by ADEM.

11.6 POST-CLOSURE CERTIFICATION

Following the completion of the post-closure care period, the permittee will submit a certification to ADEM that verifies that the landfill's post-closure care period has been completed in accordance with this post-closure plan. A copy of this certification will be placed in the operating record. This certification will be signed by a registered professional engineer.

11.7 REMOVAL OF WASTE

If the permittee or owner, or any subsequent owner of the land upon which this facility is located wishes to remove the final cover, waste, waste residue or any contaminated soils, the owner will request approval from ADEM. The owner may also ask permission to remove the notation from the recording instrument if all waste and cover soils are removed from the property and no unpermitted discharges to waters have occurred.

12.0 GENERAL OPERATIONAL STANDARDS

12.1 ACCEPTABLE WASTE

See Section 2.4 of this report.

12.2 HAZARDOUS AND INFECTIOUS WASTES INSPECTION PLAN

Only waste stipulated on the permit or otherwise approved by ADEM will be accepted at the facility. Any unapproved waste coming to the site for disposal will be refused. The facility operator will perform inspections of suspicious loads as well as random inspections of incoming loads to ensure that these loads do not contain free liquids, hazardous wastes, medical wastes, or PCB wastes. Records of these inspections will be kept on file in the facility's operating record. These records will include the origin of the waste, the transporter, any transfer stations or handlers of the waste en route to the facility and any certifications from generators provided to the facility personnel.

Personnel will be trained to inspect waste in a safe and orderly manner and to recognize any unacceptable waste such as free liquids, regulated hazardous wastes, medical wastes, regulated PCB wastes, or unapproved industrial users. If any load is suspected to contain hazardous or regulated waste ADEM will be notified immediately.

12.3 INDUSTRIAL WASTE DISPOSAL

The facility will not accept industrial waste as defined by ADEM for disposal.

12.4 WATER POLLUTION

The facility will be operated in such a manner that there should be no water pollution or unauthorized discharge. Surface water discharges from this facility will consist only of stormwater runoff. Any discharge from this facility will be conveyed through the NPDES Permit. There is no anticipation of any discharge of pollutants to groundwater.

12.5 BOUNDARY MARKERS

The facility maintains permanent markers along the boundary of the permitted disposal area and the cell boundaries. These markers are of sufficient quantity to be visible from one marker to the next.

12.6 MEASURING DEVICES

The permittee is using truck bed volume measurement for volume determination.

12.7 OPEN BURNING

No open burning will occur at the facility unless approved by ADEM.

12.8 RECYCLING AND MATERIAL STORAGE

Recycling of materials such as concrete and asphalt have occurred at the Esfeller site since the 1990s. As part of long-term waste management, materials with a usable secondary market shall be segregated from incoming waste. At this time, recycled materials will be limited to ferrous and nonferrous metals and white goods, concrete, asphalt, and woody debris.

Ferrous and nonferrous metals and white goods will be segregated by customer and/or site personnel. Following segregation, metals and whitegoods will stored outside of active disposal area until a sufficient quantity, (full roll off container or dump equipped vehicle) will be dispatched to a recycling facility.

Concrete and asphalt typically arrive in bulk at the facility. Typically, bulk concrete and asphalt is placed in a storage pile prior to entering active disposal cell. Concrete and asphalt are processed through an existing crusher and reused on the secondary commodity markets. Ferrous metals removed prior to and during disposal processing are recycled.

Woody debris may be stockpiled at the facility to allow for significant accumulation to develop a secondary market for mulch.

Bulk recycling materials will be stored outside of active, certified cells. Bulk product storage due to operations of other sister companies are often stored outside of active certified cells. Following closure and capping of cells, it is anticipated that bulk material storage may be utilized that will not impact capping materials or cover.

13.0 SPECIFIC REQUIREMENTS

OPERATION

13.1 COVER

Weekly Cover: The facility will use a minimum of six inches of compacted earth taken from areas on or adjacent to the facility or an ADEM approved alternate cover.

Final Cover: Final cover will be carried out in accordance with Section 10 of this report and ADEM Administrative Code Division 13.

13.2 UNLOADING AND COMPACTION

All waste will be unloaded and thoroughly compacted in layers of two feet or less in thickness. Waste which cannot be managed by landfill equipment in this manner will be managed in a manner approved by ADEM. Waste will be confined to as small an area as possible and placed onto an appropriate slope of approximately 25% or less.

13.3 ACCESS

Access will be controlled as described in Section 9.

13.4 SIGNAGE

A sign is posted at the facility entrance stating the following

a) name of the permittee;
b) the facility owner/operator;
c) name of the facility;
d) days and hours of operation;
e) waste types accepted; *and*
f) disposal fees.

13.5 ADVERSE WEATHER OPERATION

No disposal will take place during adverse weather conditions.

13.6 PERSONNEL

Adequate personnel will be available to insure continued and smooth operation of the facility. These personnel will be familiar with this report and the facility's engineering plans. A facility employee or contractor trained in heavy equipment operation will be responsible for spreading and compacting the waste. At least one facility employee will hold a Landfill Operator Certification issued by ADEM.

13.7 EQUIPMENT

Adequate equipment will be available on site for landfill operations. Additional equipment will be purchased or contracted on an as-needed basis.

13.8 LIQUID WASTE

Bulk or noncontainerized liquid waste, or containers capable of holding liquids, will not be accepted at the facility.

13.9 EMPTY CONTAINERS

Empty containers larger than 10 gallons in size will be rendered unsuitable for holding liquids prior to disposal in the landfill, unless otherwise approved by ADEM.

ROUTINE MAINTENANCE

13.10 SCAVENGING AND SALVAGING

Scavenging will not be permitted at the facility. Any salvaging operations will be controlled

13.11 LITTER

Litter will be controlled along the access roads, over the landfill, and the adjoining property.

13.12 PROGRESSIVE CLOSURE

As areas of the landfill reach their approved final waste elevations, they will be capped with the final cover. Each closed area will be surveyed by a registered professional land surveyor and certified by a registered professional engineer that the closed area meets the closure requirements of ADEM Administrative Code Division 13, this report and the approved engineering plans.

13.13 ALL-WEATHER ACCESS ROAD

Temporary and permanent all-weather access roads will be provided.

13.14 MONITORING EQUIPMENT

Any necessary environmental monitoring and treatment structures will be protected and maintained.

13.15 DAILY VOLUME RECORDS

The daily volume of waste received at the facility will be recorded. A quarterly report (using the forms provided by ADEM) which summarizes the daily volumes will be submitted to ADEM and placed in the facility's operating record.

13.16 VECTOR CONTROL

If determined necessary, an exterminator will be contracted.

14.0 SPECIAL WASTE

The facility is not proposing to dispose of special waste as defined by the ADEM Administrative Code, Division 13.

15.0 RECORDKEEPING

The facility will keep an operating record which will retain the following information as it becomes available:

The Solid Waste Disposal Facility Permit

2 A copy of this report and its attachments, any engineering drawings, and any other documentation submitted to ADEM during the permitting process.

3 Reports of documentation such as gas monitoring results, inspection records, training procedures, notification procedures, any information required in the Hazardous and Infectious Wastes Inspection Plan, closure and post-closure monitoring results, quarterly volume reports, waste certifications and any other report or document generated during the normal operation of the facility.

All information contained in the operating record will be furnished upon request to ADEM or be made available at all reasonable times for inspection by ADEM.

APPENDIX A

FINAL COVER QA/QC PLAN

1.0 GENERAL

The final cover system will be constructed and certified by the Quality Assurance and Quality Control (QA/QC) Engineer in accordance with the engineering plans and this Plan.

2.0 MATERIAL

2.1 The infiltration layer will consist of on-site or imported compacted earthen material not including sands.

2.2 Topsoil material shall consist of on-site or imported soils capable of sustaining native plant growth.

3.0 STOCKPILING AND MATERIAL APPROVAL

All material to be used as the infiltration layer will be approved in advance by the QA/QC Engineer. Approval is based upon successful completion of an inspection. Each load of soil will be examined either at the borrow source or the stockpile area. Any unsuitable material will be rejected or routed to separate stockpiles consistent with its end use.

4.0 CONSTRUCTION

4.1 Only soil previously approved by the QA/QC Engineer will be used in construction of the compacted earthen cover. Unsuitable material will be removed prior to acceptance by the QA/QC Engineer.

4.2 The thickness of the loose lift will be measured at random locations after spreading and leveling is completed. Loose lift thickness should not exceed 10 inches for a final 6-inch compacted lift thickness.

Each lift will be checked visually for excessive rocks, debris, plant particles and other foreign material.

4.3 The surface of each lift will be scarified prior to placement of subsequent lifts.

4.4 The surface preparation (e.g. wetting, drying, scarification, etc.) will be completed before the QA/QC Engineer will allow placement of subsequent lifts.

4.5 The exposed surface of the compacted earthen cover will be rolled with a flat drum roller or equivalent at the end of each work day or when required to protect the compacted earth from adverse weather conditions.

4.6 The finished compacted earthen cover will be substantially free of all rock or rock fragments within 6" of the surface.

4.7 The topsoil layer will consist of materials previously stockpiled and approved by the QA/QC Engineer.

4.8 The topsoil layer will be placed in one lift of approximately 6" in depth.

4.9 The QA/QC Engineer will inspect the infiltration and topsoil layers and certify that they are in accordance with the approved plans. ADEM will be notified prior to the placement of seed and mulch. The Permittee and the QA/QC Engineer should be aware that ADEM has limited resources for inspection of sites under construction. Therefore, procedures should be developed for ongoing QA/QC review, and submittal of partial QA/QC reports.

BEST MANAGEMENT PRACTICES PLAN (BMP)

INDEX

1.0 INTRODUCTION

2.0 CRITICAL AREAS

3.0 SEDIMENT AND EROSION CONTROL BMP

4.0 STORMWATER MANAGEMENT BMP

5.0 GOOD HOUSEKEEPING BMP

1.0 INTRODUCTION

Measures must be taken to protect land and water quality during and after the active life of this facility. This manual describes the best management practices (BMP) to be used during the operation of the facility. The three types of BMPs to be discussed are a sediment and erosion control BMP, a stormwater management BMP and a good housekeeping BMP.

A landfill is constantly changing locations of its active areas. Previously disturbed areas are stabilized and most often disturbed again at some point in the life of the facility. It is therefore not practical to guess exactly where a BMP will be implemented or the exact type of BMP to be implemented.

The facility will be inspected regularly to insure that the BMPs are continually implemented and effective. This manual establishes the facility's contact person and person responsible for the day to day implementation of the BMPs to be the following:

Owner, Esfeller C&D and Recycling, LLC
P.O. Box 114
Coden, AL 36523
(251) 957-2210

2.0 CRITICAL AREAS

There are certain physical conditions that need to be recognized at this facility. Typical "critical areas" include steep slopes, unstable or highly erodible soils, natural drains where runoff concentrates, areas where equipment or petroleum products are unloaded or stored, areas where stormwater could come in contact with the waste, and areas where water from adjacent property may flow onto the facility.

3.0 SEDIMENT AND EROSION CONTROL BMP

Erosion and the resulting sediment produced are problems associated with practically every landfill. Land is constantly being disturbed and exposed to erosion. This can result in on-site damages such as gullied side slopes and washed out access roads. Off- site damage resulting from this erosion might include clogged drainage ditches, sediment deposits on adjacent property, and pollution of streams and lakes. Therefore, measures must be taken to protect land and water quality.

Three primary functions of sediment and erosion control BMPs are to establish and protect vegetation, to trap sediment, and to control run-off water. BMPs used primarily to perform one of these three functions may also, to a lesser extent, perform one or more of the other functions.

3.1 VEGETATION

The best and most cost-effective protection against soil erosion is a good vegetative cover. Vegetation dissipates the energy of rain and slows the movement of run-off water. Roots and organic matter hold the soil in place. Vegetation tends to increase water movement through the soil, thus reducing run-off. Existing vegetation, particularly on steep slopes and in natural drains, should be protected. Vegetation, which includes grass, small trees and shrubs, should be fairly easy to establish on fertile, gently sloping areas. Steeper slopes of less fertile soil are much more difficult to vegetate. These areas where vegetation is difficult to establish are much more susceptible to erosion. Temporary cover crops can be used until a permanent vegetative cover is planted. Several temporary cover crops can be planted at a time

of year that is unfavorable for seeding permanent cover. Applying proper rates of lime and fertilizer is also essential. Mulch should be used on steep slopes and other areas where it is difficult to establish vegetation. Mulch reduces run-off, which allows water to infiltrate the soil. It also helps to hold seed, fertilizer and soil in place.

3.2 SEDIMENT CONTROL

Practices for trapping sediment are used to retard or divert the movement of sediment. Several practices that may be used at this facility include the following:

A) Hay Bale Barriers

Hay bales can be used as dikes to slow or divert channel flow or as a perimeter filter barrier. Hay bales should be installed in a trench, staked and back filled if they are to be effective in reducing flow velocity and filtering sediment from run-off. Hay bales should be inspected after every storm. Erosion around bale edges, erosion under bales or any other signs of deterioration should be repaired immediately. Hay bales should not remain in place more than 12 months after installation unless it can be determined significant deterioration has not occurred. When used as a perimeter filter, sediment should be removed when material is within six inches of the top of any bale. See the Engineering Plans for installation details.

8) Silt Fences

Silt fences are temporary structures to catch sediment and prevent gully erosion in temporary channels during construction and in permanent channels which are unvegetated and temporarily unable to handle flows. Silt fences should also be installed where sediment from sheet flow could enter onto adjacent property.

When installing, it is important the fabric material be anchored into a trench and back filled. Maintenance of filter fences is similar to that of hay bale dikes in that the fabric must be inspected and needed repairs implemented after every storm event. Sediment deposits should be removed when material reaches a depth of one-half the fence height. See the Engineering Plans for installation details.

C) Sedimentation Basin

A sedimentation basin is a reservoir which retains run-off long enough to allow sediment to settle out. A sedimentation basin represents one of the most important BMPs for run-off control. It is the last line of defense in a system of BMPs developed to prevent the run-off of contaminants from the facility. Water enters the facility's sedimentation basin through a

natural drainage way or a constructed channel and is released through an outfall structure.

Accumulated sediment in this basin should be removed periodically to maintain effective storage volume. Maintenance should also include regular inspections of outlet structures, dike embankments, and the entrance points, to guard against erosion or blockages that could cause dike failure or damage during storm events.

3.3 RUN-OFF WATER CONTROL

The primary methods for controlling run-off water at this facility include the use of diversion berms and swales. Flowrates along these berms and within these swales can be controlled by the use of energy dissipaters and grade control structures.

A) Berms

Diversion berms act to stop run-on from adjacent property and direct run- off from the facility into the sedimentation basin or into natural drainage ways or constructed channels which flow into the sedimentation basin. The diversion berms should be resistant to erosion from concentrated run-off and be of sufficient height to prevent overtopping.

B) Swales

Swales act to stop run-off onto adjacent property as well as to direct the facility's run-off into the sedimentation basin. Any constructed swales should be vegetated to allow for sediment removal before the water reaches the sedimentation basin. The facility's natural drainage system has been used whenever possible.

C) Grade Control Structures

Where strong gradients may exist, constructed swales or drainage ditches should be protected from erosion by reducing flow rates. This can be achieved through the use of grade control structures such as check dams, sand bags, rip rap or similar materials. These grade control structures create barriers to flow, decrease flow rates, increase sedimentation, and level channel/ditch gradients.

4.0 STORMWATER MANAGEMENT BMP

The stormwater system of the Esfeller C&D Landfill is designed to control runoff from a 25-year, 24-hour storm event. Water from disturbed areas will be intercepted by permanent control structures and collected in the detention pond and stilling basin.

Sediment and debris in the runoff that accumulates in the pond will be removed when it has accumulated to within eighteen (18") inches of the lowest openings of the outfall structure. Relatively dry silt may be deposited on flat areas of the Landfill where it is not likely to wash away. It should be spread in thin layers that will not harm vegetation. Discharge from the pond will be monitored in accordance with NPDES permit requirements.

5.0 GOOD HOUSEKEEPING BMP

Best management practices will also minimize the movement of many pollutants other than sediments. Those pollutants that are mixed in solution or are carried on fine grained sediments may pass through all BMPs and eventually reach downstream water bodies. Materials such as petrochemicals, pesticides and fertilizers are nearly impossible to control once they are present in run-off water. The only practical control option available is to prevent these pollutants from reaching run-off waters through the use of proper application techniques and good housekeeping practices.

Petrochemical run-off such as oils, gasoline and greases will be controlled using the following practices:

A) Used oil, grease and rags will be disposed of in proper receptacles and kept out of contact with rainfall or run-off water.

B) The dumping of waste materials, including used petrochemical containers, at the site will be prohibited.

C) Liquid and solid waste will be collected in containers and regularly transported from the site to an approved waste disposal facility.

D) Any necessary equipment maintenance will be undertaken at specific locations and stormwater will not be allowed to flow through these areas.

The use of many insecticides, herbicides and rodenticides is restricted by Federal or State law. These materials would be used rarely if not at all at this facility, but in the event that they are used, strict adherence to recommended practices will be observed.

Water pollution may occur from fertilizers used to develop adequate vegetation on exposed ground surfaces. If fertilizers are to be used at this facility, applications will take place in periods of best plant generation and will not take place in times of bad weather.

Measures will be taken to control on-site litter. On-site litter will be picked up and disposed of properly

ADJACENT PROPERTY OWNERS

*as of February 3, 2026 via Mobile County Revenue Commission GIS
Esfeller C&D Landfill Permit Modification and Renewal

A. Johnny R. Bowen
2970 Harmon Williams Rd
Mobile, AL 36608

B. Calvin Bosarge Jr.
8550 Highway 90
Irvington, AL 36544

C. Robert T & Valerie B Bell
7221 Raleigh Way North
Mobile, AL 36695

D. Luthers Lock It LLC
4877 Pecan Ridge East
Mobile, AL 36619

E. Tuong C. Pham
3904 Pierson Dr W
Mobile, AL 36619

F. Mobile International Speedway
122 Pecan Street
Port Barre, LA 70577

G. Esfeller Construction Company LLC
P.O. Box 114
Coden, AL 36523

H. Outpost Church Inc.
4711 Lakeland Drive
Mobile, AL 36619

I. Gregory C. Laundry
P.O. Box 506
Bayou La Batre, AL 36509

J. Calvin Bosarge Jr.
8550 Highway 90
Theodore, AL 36582

K. Calvin Bosarge Jr.
8550 Highway 90
Theodore, AL 36582

L. AAM Living Trust
6473 Canebrake Road
Mobile, AL 36695

M. Southern Bay Property LLC
11343 Walker Road
Irvington, AL 36544

N. Outpost Church Inc.
7250 Highway 90
Irvington, AL 36544

O. Thomas E Farris, Sr.
7307 James Street
Mobile, AL 36619

P. Janett A. Skelton
3324 Smith Sims Road
Trussville, AL 35173

Q. Adams Charles P, Barbara Cannon, &
Christen Adams Sellers
P.O. Box 191165
Mobile, AL 36619

R. Patricia Ann Holbrook
8 Holbrook Lane
Sumrall, MS 39482

S. Larry R & Elise E Evans
8164 Padgett Switch Road
Irvington, AL 36544

T. Salp Phase II LLC
41 W I65 Service Rd N Ste 310
Mobile, Alabama 36608

U. Esfeller Construction Exchange LLC
P.O. Box 114
Coden, AL 36523

V. St. Elmo Irvington Water Authority
P.O. Box 190
St. Elmo, AL 36568

W. Roy Dean Mansfield
3837 Riviere Du Chien
Mobile, AL 36693

X. J&J Padgett Switch LLC
c/o John Hurdle
15330 S 273RD East Ave
Coweta, OK 74429

Y. County of Mobile
P.O. Box 1443
Mobile, AL 36633

Z. Esfeller Properties LLC
P.O. Box 114
Coden, AL 36523

AA. Southern Stamping Inc.
P.O. Box 307
Irvington, AL 36544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