

PRELIMINARY DETERMINATION

PERMIT RENEWAL

Huron Valley Steel Corporation
820 Ware Street
Anniston, Alabama 36201

Huron Valley Industrial Landfill
Permit No. 08-18

March 18, 2026

Huron Valley Steel Corporation has submitted to the Alabama Department of Environmental Management (ADEM) an application for renewal of the Solid Waste Disposal Facility Permit for the Huron Valley Industrial Landfill (Permit 08-18). The waste stream for the Huron Valley Industrial Landfill would remain nonhazardous industrial wastes, including soil, rock, plastic, rubber, glass, fibrous materials, and residues from the resource recovery plant. The service area for the Huron Valley Industrial Landfill would remain Huron Valley Steel Recycling Facility in Anniston, Alabama. The maximum average daily volume of waste disposed at the Huron Valley Industrial Landfill would remain 2,000 tons per day. All conditions of the current permit, including previously approved variances, have been requested and would be granted in the renewed permit.

The Huron Valley Industrial Landfill is located in the Southeast $\frac{1}{4}$ of Section 34, Township 15 South, Range 7 East in Calhoun County, Alabama. Huron Valley Industrial Landfill consists of approximately 242.4 acres with 125.9 acres approved for disposal.

The Land Division has determined that the permit renewal application complies with the requirements of ADEM's Administrative Code 335-13 regulations for an industrial solid waste landfill.

Technical Contact:

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



SOLID WASTE DISPOSAL FACILITY PERMIT

PERMITTEE: Huron Valley Steel Corporation

FACILITY NAME: Huron Valley Industrial Landfill

FACILITY LOCATION: Southeast ¼ of Section 34, Township 15 South, Range 7 East in Calhoun County, Alabama. The facility consists of approximately 242.4 acres with 125.9 acres approved for disposal.

PERMIT NUMBER: 08-18

PERMIT TYPE: Industrial Landfill

WASTE APPROVED FOR DISPOSAL: Nonhazardous industrial wastes including soil, rock, plastic, rubber, glass, fibrous materials, and residues from the resource recovery plant

MAXIMUM AVERAGE WASTE VOLUME: 2,000 tons per day

SERVICE AREA: Huron Valley Steel Recycling Facility

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

ISSUANCE DATE: XXXXXXXXXXXX

EFFECTIVE DATE: XXXXXXXXXXXX

EXPIRATION DATE: XXXXXXXXXXXX

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

Permittee: Huron Valley Steel Corporation
820 Ware Street
Anniston, Alabama 36201

Landfill Name: Huron Valley Industrial Landfill

Landfill Location: Southeast ¼ of Section 34, Township 15 South, Range 7 East in
Calhoun County, Alabama

Permit Number: 08-18

Landfill Type: Industrial Landfill

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

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions set forth herein (including those in any attachments), and the applicable regulations contained in Chapters 335-13-1 through 335-13-16 of the ADEM Administrative Code (hereinafter referred to as the "ADEM Admin. Code"). Rules cited are set forth in this document for the purpose of Permittee reference. Any Rule that is cited incorrectly in this document does not constitute grounds for noncompliance on the part of the Permittee. Applicable ADEM Administrative Codes are those that are in effect on the date of issuance of this permit or any revisions approved after permit issuance.

This permit is based on the information submitted to the Department on May 30, 2023, and as amended, and known as the Permit Application (hereby incorporated by reference and hereinafter referred to as the Application). Any inaccuracies found in this information could lead to the termination or modification of this permit and potential enforcement action. The Permittee must inform the Department of any deviation from or changes in the information in the Application that would affect the Permittee's ability to comply with the applicable ADEM Admin. Code or permit conditions.

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

Alabama Department of Environmental Management

Date Signed

SECTION I. STANDARD CONDITIONS

- A. Effect of Permit. The Permittee is allowed to dispose of nonhazardous solid waste in accordance with the conditions of this permit and ADEM Admin. Code 335-13. Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Except for actions brought under Code of Alabama 1975, Section 22-27-1, *et seq.*, as amended, compliance with the conditions of this permit shall be deemed to be compliance with applicable requirements in effect as of the date of issuance of this permit and any future revisions.
- B. Permit Actions. This permit may be suspended, revoked, or modified for cause. The filing of a request for a permit modification or the notification of planned changes or anticipated noncompliance on the part of the Permittee, and the suspension or revocation does not stay the applicability or enforceability of any permit condition.
- C. Severability. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- D. Definitions. For the purpose of this permit, terms used herein shall have the same meaning as those in ADEM Admin. Code 335-13, unless this permit specifically provides otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.
1. "EPA" for purposes of this permit means the United States Environmental Protection Agency.
 2. "Permit Application" for the purposes of this permit, means all permit application forms, design plans, operational plans, closure plans, technical data, reports, specifications, plats, geological and hydrological reports, and other materials which are submitted to the Department in pursuit of a solid waste disposal permit.
- E. Duties and Requirements.
1. Duty to Comply. The Permittee must comply with all conditions of this permit except to the extent and for the duration such noncompliance is authorized by a variance granted by the Department. Any permit noncompliance constitutes a violation of Code of Alabama 1975, 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 one hundred eighty (180) days before this permit expires.
 3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application as required by Section I, Paragraph E, Subparagraph 2, and, through no fault of the Permittee, the Department has not made a final decision regarding the renewal application.
 4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.
 5. Duty to Mitigate. In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

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

- v. The analytical techniques or methods used.
 - vi. The results of such analyses.
 - d. The Permittee shall submit all monitoring and corrective action results at the interval specified elsewhere in this permit.
10. Reporting Planned Changes. The Permittee shall notify the Department, in the form of a request for permit modification, at least one hundred twenty (120) days prior to any change in the permitted service area, increase in the waste received, or change in the design or operating procedure as described in this permit, including any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
11. Transfer of Permit. This permit may be transferred to a new owner or operator. All requests for transfer of permits shall be in writing and shall be submitted on forms provided by the Department. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of this permit.
12. Certification of Construction. Before the Permittee may commence disposal of waste in any new cell or phase:
- a. The Permittee must submit a letter to the Department signed by both the Permittee and a professional engineer stating that the facility has been constructed in compliance with the permit.
 - b. The Department must inspect the constructed cells or phases unless the Permittee is notified that the Department will waive the inspection.
 - c. The Permittee may not commence disposal activities in any new cells or phases until approval of the new cells or phases is granted by the Department.
13. Noncompliance. The Permittee shall report all instances of noncompliance with the permit at the time noncompliance is discovered.
14. Other Information. If the Permittee becomes aware that information required by the Application was not submitted or was incorrect in the Application or in any report to the Department, the Permittee shall promptly submit such facts or information. In addition, upon request, the Permittee shall furnish to the Department, within a reasonable time, information related to compliance with the permit.
- F. Design and Operation of Facility. The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of contaminants (including leachate and explosive gases) to air, soil, groundwater, or surface water, which could threaten human health or the environment.
- G. Inspection Requirements.
- 1. The Permittee shall comply with all requirements of ADEM Admin. Code Division 13-4-.21(1)(b).
 - 2. The Permittee shall conduct random inspections of incoming loads.
 - 3. Records of all inspections shall be included in the operating record.
- H. Recordkeeping and Reporting.
- 1. The Permittee shall maintain a written operating record at the location specified in Section I, Paragraph I. The operating record shall include:

- a. Documentation of 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 wastes and special wastes.
 - e. Groundwater monitoring records, if required.
 - f. Surface water and leachate monitoring records. Monitoring is subject to applicable conditions of Section VI. of the permit.
 - g. Copies of this Permit and the Application.
 - h. Copies of all variances granted by the Department, including copies of all approvals of special operating conditions.
2. Quarterly Volume Report. Beginning with the effective date of this permit, the Permittee shall submit, within thirty (30) days after the end of each calendar quarter, a report summarizing the daily waste receipts for the previous (just ended) quarter. Copies of the quarterly reports shall be maintained in the operating record.
3. Monitoring and Corrective Action Reports. The Permittee shall submit reports on all monitoring and corrective action activities conducted pursuant to the requirements of this permit, including, but not limited to, groundwater and surface water monitoring. If groundwater monitoring is required in Section IV, groundwater monitoring shall be conducted in March and September of each year, or as directed by the Department, and the reports shall be submitted at least semi-annually, or as directed by the Department. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period and should be submitted to the Department and placed in the operating record within thirty (30) days of the monitoring event.
4. Availability, Retention, and Disposition of Records.
- a. All records, including plans, required under this permit or ADEM Admin. Code 335-13 must be furnished upon request and made available at reasonable times for inspection by any officer, employee, or representative of the Department.
 - b. All records, including plans, required under this permit or ADEM Admin. Code 335-13 shall be retained by the Permittee for a period of at least three years. The retention period for all records is extended automatically during the course of any unresolved enforcement action regarding the facility, or as requested by the Department.
 - c. A copy of records of waste disposal locations and quantities must be submitted to the Department and local land authority upon closure of the facility.
- I. Documents to be Maintained by the Permittee. The Permittee shall maintain, at the Huron Valley Steel Corporation, Anniston, Alabama office, the following documents and amendments, revisions, and modifications to these documents until an engineer certifies closure of the permitted landfill:
- 1. Operating record.
 - 2. Closure Plan.

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

Mailing Address:

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

Physical Address:

Chief, Solid Waste Branch, Land Division
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, Alabama 36110-2400

- K. Signatory Requirement. All applications, reports, or information required by this permit, or otherwise submitted to the Department, shall be signed and certified by the owner as follows:
1. If an individual, by the applicant.
 2. If a city, county, or other municipality or governmental entity, by the ranking elected official or by a duly authorized representative of that person.
 3. If a corporation, organization, or other legal entity, by a principal executive officer, of at least the level of Vice President, or by a duly authorized representative of that person.
- L. Confidential Information. The Permittee may claim information submitted as confidential 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 the Department and other appropriate agencies. A burn request should be submitted in writing to the Department outlining why that burn request should be granted. This request should include, but not be limited to, specifically what areas will be utilized, types of waste to be burned, the projected starting and completion dates for the project, and the projected days and hours of operation. The approval, if granted, shall be included in the operating record.
- C. Prevention of Unauthorized Disposal. The Permittee shall follow the approved procedures, as provided in the Application, for detecting and preventing the disposal of free liquids, regulated hazardous waste, 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 accept for disposal industrial waste as required by ADEM Admin. Code 335-13-4-.21(1)(c), and as specified in the Application.
- F. Boundary Markers. The Permittee shall ensure that the facility is identified with a sufficient number of permanent boundary markers that are at least visible from one marker to the next.

SECTION III. SPECIFIC REQUIREMENTS FOR INDUSTRIAL WASTE LANDFILLS

- A. Waste Identification and Management.
 - 1. Subject to the terms of this permit, the Permittee may dispose of the nonhazardous solid wastes listed in 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 facility for the Huron Valley Industrial Landfill is approximately 242.4 acres with 125.9 acres approved for disposal.
 - 3. The maximum average daily volume of waste disposed at the facility shall not exceed 2,000 tons per day. Should the average daily volume exceed this value by 20% or 100 tons per day, whichever is less, for two 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, nonhazardous industrial wastes, including soil, rock, plastic, rubber, glass, fibrous materials, and residues from the resource recovery plant.
- C. Service Area. The Permittee is allowed to receive, for disposal, waste from the Huron Valley Steel Recycling Facility in Anniston, Alabama.
- D. Waste Placement, Compaction, and Cover. All waste shall be confined to an area as small as possible within a single working face and placed onto an appropriate slope not to exceed 3 to 1 (See Section VIII, Paragraph 5.). All waste shall be spread in layers two feet or less in thickness and thoroughly compacted with adequate landfill equipment prior to placing additional layers of waste or placing cover. All exposed waste shall be covered once every three months, on the 3rd Friday of February, May, August, and November. If cover is unable to be applied on this day, due to severe inclement weather, national holiday, or landfill closure, cover shall be applied to all exposed waste the following Friday (See Section VIII, Paragraph 2.). A minimum of six inches of compacted earth or other alternative cover material approved by the Department and listed in Section VIII shall be added once every three months. The Permittee is approved to utilize waste materials from the material prep line (MPL) as an alternate cover (See Section VIII, Paragraph 4.).
- E. Liner Requirements. The Permittee shall install, as described in the Application, one of the three liner configurations listed as follows: the Permittee shall install a single clay liner system consisting of 2 feet of compacted clay constructed with a permeability of 1×10^{-7} cm/sec or less and 4 inch thick protective gravel layer, or the Permittee shall install a clay liner system consisting of 1 foot compacted clay constructed with a permeability of 1×10^{-5} cm/sec, a geosynthetic clay liner (Bentomat ST or equivalent) with a permeability of 5×10^{-9} cm/sec or less, and a 6 inch thick protective soil layer, or the Permittee shall install a geosynthetic clay liner – HDPE Composite (Bentomat CL or equivalent) with a permeability of 5×10^{-10} cm/sec or less and a 6 inch thick protective soil layer. The Department grants a variance, as requested in the permit application, for this site for soil requirements for liner construction required by ADEM Admin. Code 335-13-4-.18. The variance will be granted for on site soils that do not have liquid limits of thirty (30) units or greater but do exhibit 1×10^{-7} cm/sec permeability characteristics. Soils used for construction of the liner must have a plasticity index (P.I.) greater than or equal to 15 units due to the moisture sensitivity of soil at low plasticity limits (See Section VIII, Paragraph 3.).

The base of the waste or the base of the liner system 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 acres must be rendered unsuitable for holding liquids prior to disposal in the landfill unless otherwise approved by the Department.
- N. Other Requirements. The Department may enhance or reduce any requirements for operating and maintaining the landfill as deemed necessary by the Land Division.
- O. Other Permits. The Permittee shall operate the landfill according to this and any other applicable permits.
- P. Scavenging and Salvaging Operations. The Permittee shall prevent scavenging and salvaging operations, except as part of a controlled recycling effort. Any recycling operation must be in accordance with plans submitted and approved by the Department.
- Q. Signs. If the landfill is available to the public or commercial haulers, the Permittee shall provide a sign outlining instructions for use of the site. The sign shall be posted and have the information required by ADEM Admin. Code 335-13-4-.23(1)(f).
- R. Litter Control. The Permittee shall control litter.
- S. Fire Control. The Permittee shall provide fire control measures.

SECTION IV. GROUNDWATER MONITORING REQUIREMENTS

- A. The Permittee shall install and/or maintain a groundwater monitoring system, as specified below.
 - 1. The permittee shall maintain the groundwater monitoring wells and piezometers identified in Table IV.1. at the locations specified in the Application and any other groundwater monitoring wells which are added (Section IV, Paragraph A, Subparagraph 3.) during the active life and the post-closure care period.
 - 2. The Permittee shall maintain groundwater monitoring well MW-1R as the background groundwater monitoring well for the entire facility. Monitoring Wells MW-5, MW-6, and MW-7 are also

background groundwater monitoring wells and are to be included in the groundwater monitoring system as outlined in Table IV.1.

3. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with the ADEM Admin. Code 335-13.
4. Prior to installing any additional groundwater monitoring wells, the Permittee shall submit a plan to the Department with a permit modification request specifying the design, location, and installation of any additional monitoring wells. This plan shall be submitted at least one hundred twenty (120) days prior to the installation which, at a minimum, shall include.
 - a. Well construction techniques including proposed casing depths, proposed total depth, and proposed screened interval of well(s);
 - b. Well development method(s);
 - c. A complete analysis of well construction materials;
 - d. A schedule of implementation for construction; and
 - e. Provisions for determining the lithologic characteristics, hydraulic conductivity, and grain-size distribution for the applicable aquifer unit(s) at the location of the new well(s).

B. Groundwater Monitoring Requirements.

1. The Permittee shall determine the groundwater surface elevation at each monitoring well and piezometer identified in Table IV.1. each time the well or piezometer is sampled and at least annually throughout the active life and post-closure care period.
2. The Permittee shall determine the groundwater flow rate and direction in the first zone of saturation at least semi-annually or each time groundwater is sampled and submit as required by ADEM Admin. Code Division 13.
3. Prior to the initial receipt of waste at the facility, the Permittee shall sample, and analyze for the parameters listed in Appendix I of ADEM Admin. Code 335-13-4-.27 and/or any other parameters specified by the Department in Table IV. 2., all monitoring wells identified in Section IV, Paragraph A, Subparagraph 2, to establish background water quality and/or as directed by ADEM Admin. Code 335-13-4-.27(2)(j) and 335-13-4-.27(2)(a)(1).
4. The Permittee shall sample, and analyze all monitoring wells identified in Table IV.1 for the parameters listed in Appendix I of ADEM Admin. Code 335-13-4-.27(3), and/or any other parameters specified by the Department in Table IV.2, on a semi- annual basis throughout the active life of the facility and the post-closure care period in accordance with ADEM Admin. Code 335-13-4-.27(3). Sampling shall be conducted during March and September of each year, beginning with the effective date of this permit. The records and results of this sampling and analysis activity shall be submitted to the Department, within ninety (90) days of the date of sampling.
5. In addition to the requirements of Section IV, Paragraph B, Subparagraphs 1, 2, 3, and 4, the Permittee shall record water levels, mean sea level elevation measuring point, depth to water, and the results of field tests for pH and specific conductance at the time of sampling for each well.

C. Sampling and Analysis Procedures.

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Section IV, Paragraph A, to provide a reliable indication of the quality of the groundwater:

1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in the Application. Monitoring wells shall be bailed or pumped to remove at least four times the well volume of water. Slow recharge wells shall be bailed until dry. Wells shall be allowed to recharge prior to sampling.
2. Samples shall be analyzed according to the procedures specified of the Application, Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), or other appropriate methods approved by this Department. All field tests must be conducted using approved EPA test kits and procedures.
3. Samples shall be tracked and controlled using the chain-of-custody and QA/QC procedures specified in the Application.
4. The Permittee is approved for **inter-well** statistical analysis.

D. Recordkeeping and Reporting Requirements.

1. Recording of Results. For each sample and/or measurement taken pursuant to the requirements of this permit, the Permittee shall record the information required by Section I, Paragraph E, Subparagraph 9c.
2. Recordkeeping. Records and results of all groundwater monitoring, sampling, and analysis activities conducted pursuant to the requirements of this permit shall be included in the operating record required by Section I, Paragraph I, Subparagraph 1.

- E. Permit Modification. If at any time the Permittee or the Department determines that the groundwater monitoring system no longer satisfies the requirements of ADEM Admin. Code 335-13-4-.14 or Section IV, Paragraph A, of this permit, the Permittee must, within one hundred twenty (120) days, submit an application for a permit modification to make any necessary and/or appropriate changes to the system.

TABLE IV.1.
GROUNDWATER MONITORING WELLS

Monitoring Well Number	Top of Casing (feet msl)	Part Monitored
UPGRADIENT/BACKGROUND MONITORING WELLS		
MW-1R	838.25	Entire Landfill
MW-5*	827.22	Entire Landfill
MW-6*	851.02	Entire Landfill
MW-7*	815.28	Entire Landfill
DOWNGRAIDENT MONITORING WELLS		
MW-2	810.93	Entire Landfill
MW-3A	827.71	Entire Landfill
MW-4	852.81	Entire Landfill
MW-8	881.75	Entire Landfill
MW-9*	TO BE INSTALLED	Entire Landfill
MW-10*	TO BE INSTALLED	Entire Landfill
MW-11*	TO BE INSTALLED	Entire Landfill
MW-12**	TO BE INSTALLED	Entire Landfill

* Monitoring Well MW-5 is to be added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 13 through 18. Monitoring Wells MW-6, MW-7, MW-9, and MW-10 are to be added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 1 through 4. Monitoring Well MW-11 is to be added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 5 through 12. Proposed Cells 1 through 18 were included in the expansion dated February 25, 2013.

** Monitoring Well MW-12 shall be installed within 6 months of the date of issuance of this permit. The Permittee shall be required to submit the installation report and the updated groundwater monitoring plan, including boring logs, within 30 days of completion of MW-12.

TABLE IV.2.
BACKGROUND AND SEMI-ANNUAL GROUNDWATER MONITORING PARAMETERS

The facility shall analyze for the following parameters:

Indicator Parameters

pH
Specific Conductance

Inorganic Parameters

Chromium
Copper
Lead
Mercury
Nickel
Silver
Zinc

Organic Parameters

Total Organic Carbon (TOC)

NOTE: Should the specific conductance or TOC concentrations increase, the Department may require the facility to broaden the list of parameters to detect the constituent(s) of concern.

SECTION V. GAS MONITORING REQUIREMENTS

The Permittee has been granted a variance for gas monitoring at Huron Valley Industrial Landfill in accordance with Chapter 8, Division 13, ADEM Admin. Code (See Section VIII, Paragraph 1.). If at any time the Department determines that an explosive gas monitoring system is deemed necessary for the protection of human health and the environment, the Permittee must, within ninety (90) days, submit an application for permit modification for the installation of an explosive gas monitoring system that meets the proper regulatory requirements of the Alabama Department of Environmental Management.

SECTION VI. LEACHATE AND SURFACE WATER MANAGEMENT REQUIREMENTS

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

Huron Valley Steel Corporation is permitted to pump the collected leachate into a truck, return to its plant, and utilize it as process water.

SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

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

- A. Final Cover. The Permittee shall grade final soil cover such that surface water does not pond over the permitted area as specified in the Application. The final cover system shall comply with ADEM Admin. Code 335-13. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1. (See Section VIII, Paragraph 7.)
- B. Vegetative Cover. The Permittee shall establish a vegetative or other appropriate cover, as approved by the Department, within ninety (90) days after completion of final grading requirements in the Application. Preparation of a vegetative cover shall include, but not be limited to, the placement of seed, fertilizer, mulch, and water.
- C. Notice of Intent. The Permittee shall place in the operating record and notify the Department of their intent to close the landfill prior to beginning closure.
- D. Completion of Closure Activities. The Permittee must complete closure activities of each landfill unit in accordance with the Closure Plan within one hundred eighty (180) days of the last known receipt of waste.
- E. Certification of Closure. Following closure of each unit, the Permittee must submit to the Department a certification, signed by a registered professional engineer, verifying the closure has been completed according to the Closure Plan.

- F. Post-Closure Care Period. Post-closure care activities shall be conducted after closure of each unit throughout the life of this permit and continuing for a period of a minimum of thirty (30) years following closure of the facility. The Department may shorten or extend the post-closure care period applicable to the solid waste disposal facility.
- G. Post-Closure Maintenance. The Permittee shall provide post-closure maintenance of the facility to include regularly scheduled inspections. This shall include maintenance of the cover, vegetation, monitoring devices and pollution control equipment, and correction of other deficiencies that may be observed by the Department. Monitoring requirements shall continue throughout the post-closure period as determined by the Department unless all waste is removed and no unpermitted discharge to waters of the State has occurred.
- H. Post-Closure Use of Property. The Permittee shall ensure that post-closure use of the property never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area.
- I. Certification of Post-Closure. Following post-closure of each unit, the Permittee must submit to the Department a certification, signed by an independent registered professional engineer, verifying the post-closure has been completed according to the Post-Closure Plan.
- J. Recording Instruments. The Permittee must provide documentation of compliance with the requirements of the Uniform Environmental Covenants Program in ADEM Admin. Code 335-5 and shall execute the following:
1. Record a notation onto the land deed within ninety (90) days from the certification of closure. This notation shall state that the land has been used as a solid waste disposal facility, the name of the Permittee, type of disposal activity, location of the disposal facility, and beginning and closure dates of the disposal activity.
 2. File the covenant at the courthouse where the land deed is held within thirty (30) days of receipt of the covenant signed by ADEM's Land Division Chief.
 3. The Permittee shall submit a certified copy of the recording instrument to ADEM within one hundred twenty (120) days after permit expiration, revocation, or as directed by ADEM as described in the Application.
- K. Removal of Waste. If the Permittee, or any other person(s), wishes to remove waste, waste residues, or any liner or contaminated soils, the owner must request and receive prior approval from the Department (See Section VIII, Paragraph 6.).

SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

1. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.16 requiring explosive gas monitoring. (See Section V.)
2. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.23(1)(a) requiring all waste to be covered at the conclusion of each week's operation. The permittee shall be allowed to cover all exposed waste once every three months, on the 3rd Friday of February, May, August, and November. If cover is unable to be applied on this day, due to severe inclement weather, national holiday, or landfill closure, cover shall be applied to all exposed waste the following Friday. (See Section III, Paragraph D.)
3. The Permittee has been granted a variance as requested in the permit application for this site for soil requirements for liner construction required by ADEM Admin. Code 335-13-4-.18. The variance will be granted for onsite soils that do not have liquid limits of thirty (30) units or greater but do exhibit 1×10^{-7} cm/sec permeability characteristics. Soils used for construction of the liner must have a plasticity index

(P.I.) greater than or equal to 15 units due to the moisture sensitivity of soil at low plasticity limits. (See Section III, Paragraph E.)

4. The Department grants approval to Huron Valley Steel Corporation to utilize waste material from the material prep line (MPL) as an alternate cover. (See Section III, Paragraph D.)
5. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.23(c) requiring 4 to 1 working face slopes. The Permittee is approved for 3 to 1 working face slopes. (See Section III, Paragraph D.)
6. Huron Valley Steel Corporation has been approved to remove waste material from the landfill for recycling. (See Section VII, Paragraph K.)
7. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1. (See Section VII, Paragraph A.)

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

SECTION IX. ADDITIONAL SAMPLING REQUIREMENTS

PERIODIC WASTE STREAM SAMPLING

The Land Division of ADEM has determined the industrial waste generated by Huron Valley Steel Corporation's recycling operations and included in the waste stream for this site is non-hazardous. However, certain constituents of the waste stream are present in high concentrations. Therefore, additional sampling will be required for the waste stream to be landfilled.

The testing program for material to be placed in the landfill will include at a minimum semi-annual TCLP analysis for the 8 RCRA metals, and biannual completion of an ADEM Solid Waste Profile of the subject material. Protocol for sampling must follow that outlined in the Environmental Protection Agency (EPA) Publication Number 560/5-90-008, or amendments thereof, and as described in the permit application. TCLP analysis must be performed on the samples to ensure the waste stream retains its classification as non-hazardous. Results from the analysis and certification that the waste is non-hazardous must be submitted to the Department's Land Division within thirty (30) days from the date of sampling.

Permit No. 08-18 Renewal

Application



HURON VALLEY STEEL CORPORATION

820 WARE STREET • ANNISTON, ALABAMA 36201 • (256) 238-1746 • FAX: (256) 238-0069

May 26, 2023

Mr. Jason Wilson, Chief Solid Waste Branch
Alabama Dept. of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110

RE: Huron Valley Steel Industrial Landfill, Permit No. ILF/08-18
Renewal Application and Attachments
Huron Valley Steel
Anniston, Calhoun County, Alabama

Received

MAY 30 2023

Land Division

Dear Mr. Wilson:

Huron Valley Steel Submits the below listed documents relating to a permit renewal for Huron Valley Steel's Industrial landfill (permit No. 08-18).

- Application Form 439 (3 copies)
- Check #100287 in amount of \$8150.00 for Permit Renewal Fee
- List of Relevant Documents and dates
- Certification and ADEM's Approval letter for current cell waste is being disposed in.
- List of variances and special conditions
- List of Adjacent Property Owners (5/12/2023)

If you have any questions of further request please contact Tom Bonds at 256-238-9127.

Sincerely,

Tom Bonds
V.P. Operations
Huron Valley Steel

cc: Patrick L. Chumbley, LPC Technologies

SOLID WASTE APPLICATION

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

1. Facility type: Municipal Solid Waste Landfill (MSWLF)
 Industrial Landfill (ILF) #08-18 (RENEWAL)
 CCR Landfill (CCRLF)
 CCR Surface Impoundment (CCRSI)
 Other (explain) _____

2. Facility Name Huron Valley Industrial Landfill

3. Applicant: Huron Valley Steel Corporation
Name: _____
Address: 820 Ware Street
Anniston, AL 36201

Telephone: 256-238-9127

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

Township 15 South Range 7 East
Section 34 County Calhoun

5. Land Owner:
Name: Huron Valley Steel Corporation
Address: Same as Above

Telephone: Same as Above

(Attach copy of agreement from landowner if applicable.)

Solid Waste Permit Application
Page 2

6. Contact Person:

Name Tom Bonds

Position or Affiliation Vice President of Operations

Address: Same as Above

Telephone: 256-238-9127

7. Size of Facility: 242.4 Acres Size of Disposal Area(s): 125.9 Acres

8. Identify proposed service area or specific industry that waste will be received from:
No Change/On File

9. Proposed maximum average daily volume to be received at landfill (choose one):
No Change Tons/Day _____ Cubic Yards/Day

10. List all waste streams to be accepted at the facility (i.e., household solid waste, wood boiler ash, tires, trees, limbs, stumps, etc.):
No Change/On File

Thomas P. Bonds 5/26/2023
SIGNATURE DATE

List of Relevant Documents Huron Valley Steel Permit Renewal June 2023

- Current variances. Included in the renewal application
- Original local approval letter. February 14, 1991
- Hydrogeological evaluation relevant to current operations. August 23, 2011
- Stormwater runoff calculations used to size sediment ponds relevant to current operations. February 13, 2009
- Liner and leachate QA/QC plan relevant to current operations and statement where leachate goes after it leaves the facility. March 26, 2010
- The most recent operations plan. May 15, 2019
- The most recent closure plan. February 12, 2021
- The most recent groundwater monitoring plan. Reviewed May 22, 2023
- The cell certification and subsequent approval letter from ADEM for the current cell waste is being disposed in. Included in the renewal application.
- The most recent permit drawings relevant to site operations. May 10, 2019
- 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. April 10, 2012

LPC Technologies

November 28, 2012

Mr. Eric Sanderson, Chief
Solid Waste Branch, Land Division
Alabama Dept of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110

RE: Cell 4C
Huron Valley Steel Industrial Landfill
Calhoun County
Permit No. ILF/08-18

Dear Mr. Sanderson:

On behalf of Huron Valley Steel Corporation, I hereby request approval to place waste in the recently constructed industrial waste disposal cell that is designated as Cell 4C at the referenced facility. I have inspected this area and certify that it has been constructed in substantial conformance with the plans and specifications.

I appreciate your assistance with this matter. Please call if you have any questions.

Sincerely,
LPC Technologies



Patrick L. Chumbley P.E.
Ala. Registration No. 19181

Cc: Tom Bonds, HVSC



LPC Technologies

P.O. Box 381032 • Birmingham, AL 35238 • Phone: (205)253-0268 • patchumbley@gmail.com



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 31, 2014

Mr. Tom Bonds
Huron Valley Steel Corporation
820 Ware Street
Anniston, Alabama 36201

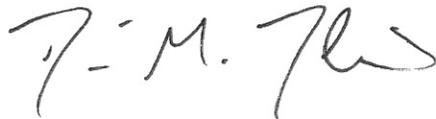
RE: Pre-Disposal Inspection
Huron Valley Industrial Landfill
City of Anniston, Calhoun County, Alabama
Permit 08-18

Dear Mr. Bonds:

On July 29, 2014, Mr. Devin Jenkins of the Alabama Department of Environmental Management performed a post-construction, pre-disposal inspection of Cell IV-C at the referenced landfill. Based on the visual inspection of the referenced cell and the engineer certification, the Department has determined that the cell is in compliance with all requirements and conditions of the permit and disposal activities may commence.

If you have any questions regarding this matter, please contact Mr. Devin Jenkins of the Solid Waste Engineering Section at (334) 270-5605.

Sincerely,

P.P. 

S. Scott Story, Chief
Solid Waste Engineering
Land Division

SSS/dmj



SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

1. The Department grants a variance from Rule 335-13-4-.16 of the permit for explosive gas monitoring. (See Section V.)
2. The Department grants a variance from Rule 335-13-4-.23 (1)(a) concerning weekly soil cover. The permittee shall be required to cover the working face once in three months. (See Section III.D.)
3. The Department grants a variance as requested in the permit application for this site for soil requirements for liner construction required by Rule 335-13-4-.18. The variance will be granted for on site soils that do not have liquid limits of thirty (30) units or greater but do exhibit 1×10^{-7} cm/sec permeability characteristics. Soils used for construction of the liner must have a plasticity index (P.I.) greater than or equal to 15 units due to the moisture sensitivity of soil at low plasticity limits. (See Section III.E.)
4. The Department grants approval to Huron Valley Steel Corporation to utilize waste material from the material prep line (MPL) as an alternate cover. (See Section III.D.)
5. The Department grants a variance from Rule 335-13-4-.23(c) requiring 4 to 1 working face slopes. The Permittee is approved for 3 to 1 working face slopes. All final slopes shall be 4 to 1. (See Section III.D.)
6. Huron Valley Steel Corporation has been approved to remove waste material from the landfill for recycling. (See Section VIII.L.)
7. The Department grants a variance from Rule 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1 (See Section VII.A.)

2023 Huron Valley Steel Landfill list of adjacent Landowners

Parcel number: 17-07-35-0-001-012.000

Earl Wilburn Johnson

798 Reaves Rd

Anniston, AL 36201

Parcel number: 17-07-35-0-001-015.000

Richard Dallas Wayne & Bobbie Jean

24609 Heidelberg Rd

Robertsdale, AL 36567

Parcel number: 17-07-35-0-001-016.000

Richard Dallas Wayne & Bobbie Jean

24609 Heidelberg Rd

Robertsdale, AL 36567

Parcel number: 17-07-35-0-001-017.000

Perry Nikia

1012 Old Reaves Rd

Anniston, AL 36201

Parcel number: 17-07-35-0-001-019.000

C/O Hafley Vickey Diane

153 Dog Wood RDG

Anniston, AL 36206

Parcel number: 17-07-35-0-001-054.001

Anniston Water Works & Sewer Board

P.O. Box 2268

Anniston, AL 36202

Parcel number: 17-07-35-001-056.000

Robert Satcher

P.O. Box 806

Lawrenceville, VA 23868

Parcel number: 17-07-35-0-001-061.000

Industrial Waste Inc.

P.O. Box 3405

Oxford, AL 36203

Parcel number: 22-02-03-0-001-001.000

Oxford Coldwater Properties LLC

4420 US HWY 78W

Oxford, AL 36203

Parcel number: 17-08-34-0-001-002.000; 17-08-34-0-001-001.000
Center of Hope Inc.
2906 Bynum Leatherwood Rd
Anniston, AL 36201

Parcel number: 17-08-34-0-001-003.000
Patrick, Jeffery & Mary Helen Christopher
45 County Rd 2402
Wedowee, AL 36278

Parcel number: 17-08-34-0-001-005.000; 17-08-34-0-001-006.000
Timothy J & Jonnie Baldwin
2610 Bynum Leatherwood Rd
Anniston, AL 36201

Parcel number: 17-08-34-0-001-007.00; 17-08-34-0-001-012.001; 17-08-34-0-001-013.000
Richard & Sumalee Cheatwood
212 Circle Dr W
Anniston, AL 36201

Parcel number: 17-08-34-0-001-016.004; 17-08-34-0-001-016.007
Debra C Boyd
P.O. Box 496
Alexandria, AL 36250

Parcel number: 17-08-34-0-001-016.003
Davis Amber & Woodrow Rebel
333 Cunningham Dr
Anniston, AL 36201

Parcel number: 17-08-34-0-001-033.000
Voels Blaine M & Lyn L
2070 Morrisville Rd
Anniston, AL 36201

Parcel number: 17-07-35-0-001-052.000
Robert T. Howle
135 Cottaquilla Rd
Jacksonville, AL 36265

Parcel number: 17-07-35-0-001-059.000
Taylor Holdings Inc.
P.O. Box 3405
Oxford, AL 36203

Parcel number: 17-07-35-0-001-053.001; 17-07-35-0-001-020.000
Union Foundry Company
1501 W 17th St
Anniston, AL 36202

Parcel number: 17-07-35-0-001-018.000
C/O Richard Jackie
14 County Rd 159
Dearmanville, AL 36257

Parcel number: 22-02-03-0-001-007.001
Tammy Broadwell
68 Clay Pit Road
Anniston, AL 36201

Parcel number: 22-02-03-0-001-012.000
Donald Hill
1918 Morrisville Rd
Anniston, AL 36201

Parcel number: 22-02-03-0-001-013.000
Donald Hill
1918 Morrisville Rd
Anniston, AL 36202

Variance Info.

Huron Valley Industrial Landfill (Permit No. 08-18) requested variance extensions

 Tom Bonds <bondst@hvsc.net>
To: Adornato, Melissa H

  Reply  Reply all  Forward    ...
Thu 2/5/2026 9:52 AM

 Appendix-H 1-13-1992 appli... 615 KB  1-13-1992 application.pdf 984 KB  Variance #2.pdf 455 KB  Variance #7.pdf 1 MB

4 attachments (3 MB)  Save all to OneDrive - Alabama Department of Environmental Management  Download all

Melissa Adornato, Huron Valley is replying to ADEM's e-mail request for Huron Valley Steel's landfill permit #08-18 granted variances. Huron Valley Steel request that variances 1,2,3,5, and 7 be extended as part of Huron Valley Steel's current permit renewal. Please find attached Adem's requested information for Variances 1,2,3,and 7. As per our phone conversation, Huron Valley Steel has no information covering variance 5, and ADEM's e-file system does not have any information covering variance 5. It appears that variance 5 was granted by ADEM between Huron Valley Steel's landfill permit renewal dated 1998 and 2003. Huron Valley Steel request to keep variance 5 which allows for Huron Valley Steel to utilize 3 to 1 working face slopes given that there are no environmental impacts with this variance. Due to the file size I have included the Drawings for variance 7 in a separate e-mail.

- Variances 1 & 3 are included in attachments (1-13-1992 application) and (appendix-H 1-13-1992 application).
- Variance 2 is included in attachment (Variance #2)
- Variance 5 (no documentation could be found)
- Variance 7 is included in attachment (Variance #7), (separate drawing e-mail)

Thanks,
Tom Bonds
Huron Valley Steel
256-238-9127 office
256-453-1146 cell
bondst@hvsc.net

 Reply  Forward

SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

1. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.16 requiring explosive gas monitoring. (See Section V.)
2. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.23(1)(a) requiring all waste to be covered at the conclusion of each week's operation. The permittee shall be allowed to cover all exposed waste once every three months. (See Section III, Paragraph D.)
3. The Permittee has been granted a variance as requested in the permit application for this site for soil requirements for liner construction required by ADEM Admin. Code 335-13-4-.18. The variance will be granted for onsite soils that do not have liquid limits of thirty (30) units or greater but do exhibit 1×10^{-7} cm/sec permeability characteristics. Soils used for construction of the liner must have a plasticity index (P.I.) greater than or equal to 15 units due to the moisture sensitivity of soil at low plasticity limits. (See Section III, Paragraph E.)
4. The Department grants approval to Huron Valley Steel Corporation to utilize waste material from the material prep line (MPL) as an alternate cover. (See Section III, Paragraph D.)
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6. Huron Valley Steel Corporation has been approved to remove waste material from the landfill for recycling. (See Section VII, Paragraph K.)
7. The Permittee has been granted a variance from ADEM Admin. Code 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1 (See Section VII, Paragraph A.)

1-13-92

January 13, 1992

Alabama Department of Environmental Management
1751 Cong. W.L. Dickinson Drive
Montgomery, Alabama 36130

ATTENTION: Mr. Gerald Hardy, Chief
Engineering Services Branch
Land Division

Subject: PERMIT APPLICATION
INDUSTRIAL LANDFILL FACILITY
HURON VALLEY STEEL CORPORATION
CALHOUN COUNTY, ALABAMA
Our Project No. B5807-001

Gentlemen:

Ground Engineering and Testing Service, Inc., on behalf of Huron Valley Steel Corporation, is pleased to submit this revised permit application for an industrial landfill in Calhoun County, Alabama. These corrections are in response to the notice of deficiency dated January 6, 1992.

We appreciate your review of this information, and look forward to a favorable reply and approval. Please feel free to contact us if you have any questions or need additional information.

Very truly yours,

GROUND ENGINEERING AND TESTING SERVICE, INC.

James C. Pegues, Jr., P.E.
Senior Geotechnical Engineer

Richard A. Bourquard, P.E.
Senior Geotechnical Engineer

cc: Huron Valley Steel Corporation
Attention: Mr. Dick Anderson

SOLID WASTE APPLICATION

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

1. **Facility type:** Sanitary Landfill (SLF)
 Inert Landfill (LF)
 X Industrial Landfill (LF)
 Other (explain) _____

2. **Facility Name:** Huron Valley Steel Corporation

3. **Applicant:**

Name: Huron Valley Steel Corporation

Address: 820 Ware Street
Anniston, Alabama 36201

Telephone: (205) 238-1746

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

Township 15 South Range 7 East Section 34 (SE ¼)
County Calhoun

5. **Land Owner:**

Name: Huron Valley Steel Corporation

Address: 820 Ware Street
Anniston, Alabama 36201

Telephone: (205) 238-1746

(Attach copy of agreement from landowner if applicable.)

6. **Contact Person:**

Name: Dick Anderson

Position or Affiliation Vice President, Anniston Operations

Address _____

Telephone: (205) 238-1746

7. **Size of Disposal Facility:**

123± Acres

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

Huron Valley Steel Corporation

9. **Proposed average daily volume to be received at landfill:**

450 Tons/Day

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

Soil, rock, plastic, rubber, glass, fibrous material (industrial waste generated by Huron Valley's recycling operations)

TT Anderson
SIGNATURE

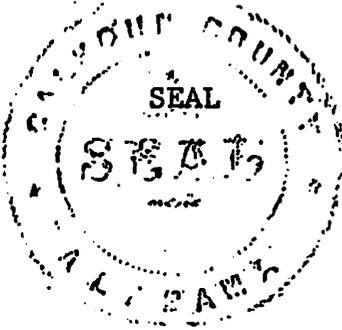
10/15/91
DATE

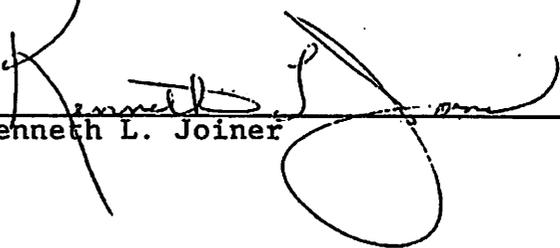
STATE OF ALABAMA**

CALHOUN COUNTY **

I, Kenneth L. Joiner, Administrator/Treasurer for the Calhoun County Commission, do hereby certify that the attached and foregoing is a true and correct excerpt from minutes of the meeting of the Calhoun County Commission held on Thursday, February 14, 1991. The same appears of record in Minute Book C-C.

Done this 20th day of February, 1991.




Kenneth L. Joiner

COPY

The following is an excerpt from the minutes of the Calhoun County Commission meeting held on February 14, 1991, at 10 o'clock a.m.:

Commissioner Don Curry recognized Mr. Jim Farrell, representing Donoho Clay Company, a clay mining operation in Calhoun County, and Mr. Dick Anderson and Mr. Dwayne Boltz of Huron Valley Steel, a metal reclamation plant located in West Anniston. Representatives of the Company presented the Commission with a proposal that would eliminate a substantial amount of waste being deposited into the Calhoun County Landfill. Huron Valley Steel currently disposes of all waste from its operation into the Calhoun County Landfill and proposes an alternate plan of assisting Donoho Clay Company in reclamation of strip mining operations. It is the intention of both companies, according to their representatives, to apply to the Alabama Department of Environmental Management for a permit to establish an inert landfill to accomplish these goals. All members of the Commission concur in this proposal and so stated during discussion proceedings with the company representatives. It was the concensus of the entire Commission that if this project is licensed, it will indeed extend the life of the Calhoun County Landfill.

Motion was entered by Commissioner Don Curry to authorize the Chairman of the Commission to sign the Certification of Application to Alabama Department of Environmental Management. This motion was seconded by Commissioner Charles Fuller and received unanimous support of the County Commission.

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- III. Design and Operational Plans
 - A. Site and Surrounding Area
 - B. Operations
- IV. Site Soil and Geologic Conditions
 - A. Geology
 - B. Exploratory Methods
 - C. Subsurface Conditions
 - D. Ground Water Levels
- V. Ground Water
- VI. Cover
- VII. Explosive Gases
- VIII. Site Drainage
- IX. Liner and Leachate
 - A. Liner
 - B. Leachate
- X. Access
- XI. Sequence of Operation
- XII. Closure

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Appendix A	ADEM Ground Water Review
Appendix B	Site Location Map
Appendix C	Boundary Survey
Appendix D	Boring Logs
Appendix E	Analytical Test Results
Appendix F	EPA Leachability Report
Appendix G	Mineralogical Test Results (Soil)
Appendix H	Laboratory classification test results
Appendix I	Well Survey
Appendix J	Adjoining Property Owners
Appendix K	QA/QC Procedures

I. SUMMARY

Huron Valley Steel Corporation operates a recycling facility in Anniston, Alabama. Primarily, they recycle non-ferrous metals obtained from scrap automobiles. Their processes allow them to separate the various non-ferrous metals for re-use in other manufacturing processes.

There is a waste by-product which is generated by these processes. The waste consists of a variety of materials, including soil, rock, plastics, rubber, glass, and fibrous material. This waste material is currently being disposed of in the Anniston/Calhoun County sanitary landfill. Analytical test data on the material is attached in Appendix E. The metal constituents reflecting more than trace amounts are barium, cadmium, chromium, and lead. Approximately 12 to 14 ppm of PCB has also been indicated in random sampling and analysis. However, a recent EPA study suggests that the leachability of PCB from shredder fluff is very low. A copy of this report can be found in Appendix F.

Huron Valley has decided to pursue developing their own landfill for the disposal of this material. A proposed site has been located a few miles from the Huron Valley facility. It is currently an active clay surface mine, operated by the Donoho Clay Company.

Ground Engineering has been assisting Huron Valley in the development of plans and permit application for this landfill. We have performed geotechnical studies on the site, and have monitored groundwater levels with a series of piezometers.

It is our opinion that the development of this landfill will accomplish two major issues. One, it will assist the Calhoun County landfill in extending the life of its sanitary landfill by removing a considerable amount of waste from its waste stream. Secondly, this landfill will serve as a reclamation project for the strip mining activities which have taken place for several years.

This submittal along with the appropriate drawings have been prepared in accordance with applicable sections of the Alabama Department of Environmental Management Administrative Code, Division 13. Various aspects of the project are presented in the following text.

II. SITING STANDARDS

The landfill has been sited in compliance with the ADEM Administrative Code, Chapter 13-4-.01.

The landfill is not located within the floodplain of any stream.

The landfill site has been and is continually being disturbed by the mining operation. To our knowledge, there are no known endangered or threatened species at the site. A biologist from the University of Alabama at Birmingham is performing an assessment, and his findings will be forwarded once they are available. The facility and practices at the facility should not result in the destruction or adverse modification of any critical habitat.

Donoho Clay currently has a NPDES permit for a discharge point located on the southern end of the site. It is the intent of Huron Valley to maintain this single discharge point. The necessary modifications to the permit will be made to accommodate this new site use once the landfill permit has been approved. The Water Division has been contacted with regards to these modifications.

There are no known wetlands on this site.

The facility will be constructed such that the bottom of the waste will be a minimum of 10 feet above the groundwater table or bedrock. This 10 feet separation will apply to both existing topographic regions, and areas disturbed by mining.

There are no airports or runways located within 10,000 feet of the planned facility.

There are no known active faults or sinkholes located on the site. The topography on the site varies considerably, as would be expected on a strip mine site. Elevations vary from a high of about EL 895 to a low of below EL 725. A topographic map was prepared in September 1990 and is included as one of the drawings in this submittal. The lower elevations are in the areas currently being mined, and have changed since the topographic map was prepared. It is primarily in this lower region where mining is expected to continue.

Again, the site is currently being mined, and there is no known archaeological or historical significance to this site.

III. DESIGN AND OPERATIONAL PLANS

A. Site and Surrounding Area

The site is located in Calhoun County, west of the city of Anniston. It can be located on the U.S.G.S. Eulaton Quadrangle in the SE 1/4 of Section 34, Range 7 East, Township 15 South. A portion of this quadrangle can be found in Appendix A. A boundary survey can be found in Appendix B.

The site is accessed off Morrisville Road, approximately 1 mile east of the Calhoun County Sanitary Landfill. The access road into the site is identified on County tax maps as 'Clay Pit Road'.

The site is currently operated by the Donoho Clay Company as a strip mine. This strip mining has taken place for approximately 40 to 50 years. Active mining is underway in a large pit at the center to east-center portion of the site. Mining is performed with bucket excavators, bull-dozers, and dump trucks.

Of the 123± acres on the site, approximately 80 acres have been disturbed as a part of the mining. Permitting and bonding is through the State of Alabama Department of Industrial Relations. There are plans for mining to continue for several more years by Donoho Clay.

The surrounding area is predominantly residential. There are no airports located within 10,000 ft of the site. There are no known zoning restrictions for this property.

There are several ponds on the site which serve as detention and sedimentation ponds. Some ponds currently intercept only surface drainage from off-site. Other ponds are filled by pumping from the lower reaches of the site. Discharge off-site is at one point only, at the southern end of the site. Donoho currently has a NPDES permit for this discharge point, and it is the intent of Huron Valley to maintain this single discharge point. The necessary modifications to the permit will be made to accommodate this new site use once the landfill permit has been approved. The Water Division has been contacted with regards to these modifications.

A more detailed discussion of site drainage plans is presented in later sections.

In accordance with the Administrative Code, we performed a water well survey of properties within a 1400 foot radius of the proposed landfill site. Contact was made through visits to the house or queries of neighbors. Several attempts were made at a few of the homes, with no contact made. If we could not make contact with an individual home, we attempted to query the neighbor about the presence of a well.

There was at one time a community well which served several families. However, it is our understanding that this well is no longer in service. We found only one house which is served by a well. It is located northeast of the landfill site, and was occupied by an employee of Donoho Clay. He has now moved to another location on the site and is served by city water.

Our interviews indicate that all other houses in the area are served by city water.

B. Operations

Access onto the property is currently off of Morrisville Road. The entrance road is a paved roadway which is listed on the tax maps as a County road. Soil berms deter access onto much of the mine property. A partial fence with a locking gate restricts access into the landfill. There are scattered dirt roadways which lead to various areas of the mine.

These existing roadways will remain intact for the most part. No modifications to the main entrance road are planned. Some of the internal roadways will be modified to accommodate both mining and waste placement. Eventually all roads crossing the existing mine will be covered with waste. Roadways used for transporting waste will be maintained with motor graders or other appropriate equipment.

A topographic map indicating the planned finish grades is included with the drawings accompanying this submittal. The top of the waste fill will be EL 900. This will result in fill heights of as much as 155 feet.

We have calculated a final volume of approximately 4.4 million cubic yards of waste. Huron Valley has projected a peak average volume of 15,000 cubic yards of waste per month. This will result in an estimated life of the landfill of approximately 24.5 years.

The waste will be transported from Huron Valley in trucks. The waste will be end dumped and then spread with track mounted dozer equipment. Lift thicknesses will generally be on the order of 2 feet. Compaction of the waste will be accomplished with the bulldozer.

A minimum buffer of 100 feet from property lines to the edge of the waste will be maintained, as required by Rule 335-13-4.12.

IV. SITE SOIL AND GEOLOGIC CONDITIONS

A. Geology

Published geologic information indicates that the site is underlain by the Knox Group Undifferentiated. This formation typically consists of a dolomite or dolomitic limestone bedrock. The parent bedrock will typically weather to form a moderately plastic silty clay containing chert and other fine gravel.

In the early 1980's, Donoho Clay had borings and mineralogical studies performed at the site. We have been provided with the laboratory test results from this study which lists the mineralogical composition of the clays. The clays are predominately quartz (80 to 85 percent), with gibbsite (5 to 10 percent) and hematite (1 percent or less) the remaining constituents. A copy of a portion of these results is attached in Appendix G.

Sinkholes are a common feature in this type of geologic formation. However, we have reviewed published data which indicates that active sinkholes have not been documented on this site. We also saw no evidence of active sinkholes during our studies. It is our opinion that all depressions on site are man-made.

B. Exploratory Methods

Twelve borings were drilled at the site to depths of 6 to 80 feet. Three of the borings (B-6, B-11, and B-12) were drilled on an adjacent parcel which was originally considered for inclusion in this landfill but was later omitted. However, these borings have been included in this submittal for reference. All remaining borings were drilled on the parcel being permitted.

Six of the borings encountered refusal to soil drilling methods. Other borings were terminated at predetermined depths. Split-spoon sampling and penetration testing was performed in all borings. Following initial sampling intervals of 2.5 feet or 5 feet, samples were collected every 10 feet.

Six of the borings were converted to piezometers to allow for long term measurements of water levels. PVC screen was set in the bottom of the hole with a sand pack in the annulus. Solid PVC riser brought the piezometer to the ground surface, with a bentonite seal and grout plug at the ground surface.

C. Subsurface Conditions

Our borings generally found firm to very stiff silty clays. Some of the soils were classified as silts rather than clays. Occasional interbeds of sand and fine gravel were found in a few of the borings. There was also fine gravel scattered throughout the clays.

As mentioned earlier, some of the borings encountered refusal to soil drilling methods. Refusal varied from 6 to 75 feet. The shallowest refusal of 6 feet was in Boring B-3. It is likely that refusal was on a larger boulder encountered in the soil matrix. Other than this one occasion, refusal was below a depth of 25 feet.

We have performed a few Atterberg limits tests on representative samples. Liquid limits varied from 16 to 57, with plasticity indices of 1 to 27. Values of percent passing a No. 200 sieve ranged from about 47 to 90 percent. A summary of laboratory test results can be found in Appendix H.

D. Groundwater Levels

Initial water levels were taken in the piezometers shortly after installation. Additional water levels were taken approximately 3 weeks later. On August 1, 1990 the wells were fully developed by bailing until dry, or until a stable water level was obtained. Water levels were obtained periodically thereafter through August 9. Additional water levels were then obtained on January 25, 1991. The higher groundwater levels (August, 1990) will be used to establish the required 10 feet separation between groundwater and waste.

The following Table 1 summarizes the water level readings.

There was a concern that the surface impoundments on the site would influence the water levels in the piezometers. There is likely some influence from these ponds. However, it appears that the influence is nominal.

The data suggest that the water level is above the existing ground surface in the lower reaches of the mine during wetter periods of the year (near Boring B-4). Donoho pumps from sumps in this area on a regular basis, likely lowering the water level slightly. As discussed later, it is our intent to fill this area of the landfill with soil to achieve additional vertical distance above the water level prior to landfilling. This backfilling is projected to be to Elevation 745. As the backfilling proceeds, the piezometer will be extended so as to maintain some means of measuring groundwater. The required separation between groundwater and waste (10 feet minimum) will be maintained, and the proposed backfill elevation modified to reflect such. It is anticipated that waste will not be placed in this area for at least 5 years.

TABLE 1
WATER LEVEL READINGS
HURON VALLEY LANDFILL SITE
CALHOUN COUNTY, ALABAMA

<u>BORINGS</u>	<u>GROUND ELEV.</u>	<u>GROUND WATER ELEVATION</u>	
		<u>8/9/90</u>	<u>1/25/91</u>
B-1	760	732	715
B-2	768	736	727
B-4	731	730	724
B-8	805	758	753
B-10	805	774	753
B-12	870	840	830

V. GROUNDWATER

Recovery analyses performed on measurements of water level recovery in wells B-1 and B-2 over a period of 5 days show a very slow recovery rate. After the five day period, the wells had not completely equilibrated to their original static levels. Calculation of permeabilities were made from the recovery data, employing the Hvorslev method of in-situ soil permeability analysis.

Based on the recovery analysis of the two referenced wells, permeabilities in the range of 10^{-7} cm/sec were calculated.

The ground water data indicates that ground water flow on this site is to the south. We will install ground water monitoring wells as required by Rule 335-13-4-14. One upgradient and 2 downgradient wells will be installed, at the approximate locations shown on Drawing No. 5807-5. Once approval from the Groundwater Section of the Water Division is obtained, these wells will be installed and developed prior to disposal of waste. It is anticipated that installation will occur during the 30 day Public Notice period.

VI. COVER

In accordance with Rule 335-13-4-.23(1)(a), a minimum of 6 inches of compacted earth will be placed at the conclusion of each weeks operation. This weekly cover material will consist of on-site soils having sufficient clay content to provide an adequate seal on the landfilled waste. Much of the on-site stockpiled "mine spoil" material will be used. This "mine spoil" material consists of on-site soils deemed unsuitable for refractory use, but still having a considerable clay content.

If additional waste is not to be placed in individual cells for a period of three months or more, an intermediate cover 12 inches thick shall be placed in accordance with Rule 335-13-4-.23(1)(b). This intermediate cover shall be graded to prevent ponding of water, and shall be prepared for a vegetative cover. Final cover will be placed within 60 days after landfilling has been completed for each are a fill of 2 acres or more. Within 30 days of completion of final grading, a vegetative cover will be established in accordance with Rule 335-13-4-.23(1)(c)2.

VII. EXPLOSIVE GASES

1

The waste placed in this facility will be non-organic. Therefore, the generation of explosive gases is not expected. A variance from the regulation requiring a gas monitoring system is being requested from the Solid Waste Branch.

VIII. SITE DRAINAGE

Drainage systems are designed to carry runoff from both on-site and off-site sources. Most of the drainage will be due to runoff from the waste pile. However, there is some off-site drainage which enters the site. Any drainage from off-site will be diverted so that it does not come in contact with waste material.

The existing pond located on the southern portion of the site will be used for a sedimentation pond. The size of this pond will be increased to handle the runoff from the 10 year, 24 hour event. The bottom of the pond will be at about EL 785. Normal pool of the pond will be at about EL 800.

Runoff will be diverted into the pond through the use of perimeter ditches on both sides of the waste pile. The ditch will be a flat bottom ditch with side slopes of 3H:1V. The slope of the ditch will be minimal. There is less than 10 feet of fall between the existing elevation on the north side of the waste pile and the pond elevation of EL 800. During storms in excess of the 10 year, 24 hour event, some water may be detained in the ditches for a short period of time.

All water will not be diverted directly to this primary sedimentation pond during initial waste placement. Also, the construction of all portions of the diversion ditches alongside the landfill will not occur immediately. As mentioned previously, some mining will continue during the first few years of waste placement. The existing topography and drainage patterns will require drainage to first be diverted to other temporary ponds. Water will then be pumped from these ponds into the primary sedimentation pond, as is now occurring. This mode of operation will continue until mining is complete and landfilling is fully underway. Intermediate sedimentation ponds are so noted on the drawings.

Once waste placement is to proceed to an area where a temporary sedimentation pond is located, the pond will be drained and the sediment and other soft soils removed, exposing competent residual soils. Liner construction will then proceed in accordance with ADEM Rules and the QA/QC procedures included as a part of this submittal. If necessary to maintain a 10 feet separation between groundwater and waste, fill placement will be performed prior to liner construction. Again, fill placement will be in accordance with the QA/QC procedures contained in this submittal.

Berms will be constructed in the different cell areas to help control stormwater run-off. Berms will be used to confine waste, while at the same time diverting stormwater run-off to the sedimentation ponds. This will reduce the amount of leachate generated.

The attached drawings show the planned sequence of waste placement and stormwater diversion.

IX. LINER AND LEACHATE

A. Liner

At the direction of ADEM, a liner will be used at this site to minimize ground water contamination from leachate. Huron Valley has elected to use a compacted clay liner.

The clay liner will be constructed using on-site soils. The liner will be compacted in thin lifts (compacted thicknesses of 4 to 6 inches) to a completed thickness of 24 inches. The soil will be compacted to such a degree that the soil has a coefficient of permeability of 1×10^{-7} cm/sec. Moisture content at the time of final compaction will be within 2 percent of optimum moisture content.

The soils used for the liner will meet the following minimum criteria:

- 1) Be free of oversize particles such as rocks, roots, limbs, and other foreign substances which will affect the integrity of the liner.
- 2) Be classified under the unified soil classification system as CL, CH, or SC.
- 3) Have greater than 30 percent passing No. 200 sieve.

The on-site soils have been tested and are found to generally comply with the requirements outlined above. There are some on-site soils which have a permeability of 10^{-8} cm/sec, but have a liquid limit less than 30 units. We request a variance on this requirement. Laboratory tests on these materials can be found in Appendix H.

Monitoring and testing of the liner will be under the supervision of a geotechnical engineer registered in the State of Alabama. A QA/QC plan for the construction of the liner can be found in Appendix K.

A statement from the engineer will be provided to the Department indicating that the liner was installed in accordance with ADEM Administrative Code 13, and in accordance with the approved plans.

B. Leachate

As mentioned previously, soil berms will be constructed to create the desired disposal cells. A leachate collection pipe will be used near the base of these berms to allow for the collection and discharge of leachate. The pipe will be 6 inch diameter Schedule 80 PVC pipe with drilled holes for the entry of leachate. These pipes will be diverted to a solid 6 inch diameter Schedule 80 pipe which will extend through the berm and into a lined pond designated solely for the holding of leachate. The leachate ponds are designed for the 10 year, 24 hour event. The leachate ponds will have a clay liner like that constructed for the waste cells. Liner materials, requirements, and specifications for the waste cells will also be used for the leachate

ponds.

The proposed waste is a relatively coarse material, and will readily pass water and leachate. Therefore, a special drainage media will not be used. However, the leachate collection pipe will be wrapped with a geotextile to reduce the potential for clogging.

The leachate will be diverted to a special lined pond. As the pond approaches capacity, and/or after significant rain events, the leachate will be sampled and tested. If limits allow, the leachate will then be pumped to the sedimentation pond and discharged with other runoff. If limits are such that this is not allowed, Huron Valley proposes to pump the water into a truck, return it to the plant, and utilize it as process water. Testing procedures and allowable limits will be the same as those established for the NPDES Permit (to be established).

As the ponds are expanded, or closed, they will be pumped free of product, and the sediment/sludge in the bottom removed. It will be difficult to maintain the full integrity of the liner during this process. Therefore, Huron Valley proposes to place and compact an additional 12 inches of liner quality soil over the competent clays exposed after sediment removal.

X. ACCESS

Only one roadway enters the landfill site, a county road off of Morrisville Road. An automatic, locking gate has been installed on this roadway to limit access to the landfill site. This gate will be locked when the landfill is not in operation. Access will be restricted to employees of Huron Valley or Donoho Clay.

XI. SEQUENCE OF OPERATION

Plans are to begin the waste placement near the northwest corner of the site, at the pond shown on the topographic map as being at EL 789.1. This pond, as well as other ponds not being used as a sedimentation pond, will be drained prior to waste placement. Necessary cleaning of soft, wet soils will take place to allow for construction of the liner, i.e. sediment will be removed to expose competent residual clays prior to liner construction. The minimum separation of 10 feet between ground water and waste will be maintained.

This initial fill area (designated as Area I) will be subdivided into approximately 3 sub-cells for waste placement, as shown on the design drawings. Stormwater will be diverted around the waste cell area to the existing sedimentation pond shown on the topographic survey at EL 748.6. Leachate will be directed to the pond located just south-southeast of the waste area. This pond is designed for the 10 year, 24 hour event.

Once Area I has been filled, waste placement will proceed to Area II, located where the larger pond at EL 798 is located. As before, this pond will be drained, sediment and other soft soils removed to expose competent residual soils, and the liner constructed. Again this area will be subdivided into smaller cells. Stormwater will be diverted to the sedimentation pond identified as being at EL 748.6, and leachate diverted to the Area I leachate pond, which will have been enlarged to accommodate the larger disposal area.

Area III, located to the south-southeast, will be the next area of fill. At the present time, plans are to have the lower portion of the strip-mined area backfilled to about EL 745 (Shown as Area IV). Leachate from Area III will be diverted to a designated portion of this backfilled area. A pond will be constructed to store the leachate. The pond will be constructed to separate leachate from the remainder of stormwater runoff.

The final fill area will be Area IV. Leachate from this area will likely be pumped from leachate collector pipes located below the waste. Pumping will be used to maintain a head of 1 foot over the liner. The leachate will be pumped to an intermediate storage tank until disposal in the method outlined previously.

XII. CLOSURE

Closure will be in accordance with Rule 335-13-4-.20. Final cover will be graded such that surface water will not pond. Final cover will consist of 2 feet of soil, and will have a slope no steeper than 25 percent and no flatter than 5 percent. Slopes longer than 25 feet will have horizontal benches every 20 vertical feet.

Final grading will begin within 60 days of achieving final approved elevations or ceasing landfilling in each phase. Within 30 days of achieving final grades, final cover shall be prepared for the establishment of vegetative cover in accordance with Rule 335-13-4-.20(2).

Post closure maintenance will be performed by the owner, operator, or responsible party in accordance with Rule 335-13-4-.20(3). Eroded areas, and/or settled areas allowing for ponding of water will be filled with suitable soil cover, compacted, graded, and appropriate cover established. Areas with extensive surface cracks shall be corrected to prevent infiltration of surface water.

Access control structures shall be maintained and signs posted to state the facility is closed. Waste dumped at the facility following closure shall be removed to an approved disposal facility by the permittee, operating agency, or owner.

Monitoring devices and pollution control measures as outlined in Rule 335-13-4-.20(3)(g) shall be maintained.

Post closure use of the property will be limited so as to not disturb the integrity of the final cover, liner, or other component of the system unless the Department determines such activities will not pose a threat to human health or the environment, or the activities are necessary to reduce a threat to human health or the environment.

Within 90 days after closure, the permittee or owner shall record a notation on the land deed and/or other similar instrument examined during a title search, indicating:

- . the land has been used as a solid waste disposal facility;**
- . use of the land is restricted by the items of Rule 335-13-4-.20(4);**
- . the location and dimensions of the disposal facility with respect to permanent survey benchmarks and section corners;**
- . the name of the permittee or operating agency, the type of disposal facility, and the beginning and closure dates of the disposal activity;**

certification by an engineer or land surveyor that all closure requirements have been completed.

The permittee or land owner will submit a certified copy of the recording instrument to the Department within 120 days after permit expiration. The Department will be notified if anyone wishes to remove waste or any component from the facility.

I. SITE PREPARATION

1. CLEARING AND GRUBBING

- A. Clear areas required for access to site and execution of work.
- B. Remove trees and shrubs within construction area. Grub out stumps, roots, and rock.
- C. Excavate topsoil from areas to be further excavated or regraded, and stockpile on site at location designated by the Owner.

2. PROTECTION

- A. Protect plant growth and features remaining in buffer.
- B. Protect bench marks and existing work from damage or displacement.
- C. Maintain designated site access for vehicle traffic.
- D. Protect bench marks, existing structures, fences, and roads.
- E. Notify owner of unexpected subsurface conditions.
- F. Grade excavation top perimeter to prevent surface water run-off into excavation.

3. REMOVAL

- A. Remove debris from site and dispose of as directed by the Owner.

II. ENGINEERED FILL

1. TESTS

- A. All testing will be the responsibility of the Owner.
- B. Testing has been performed on the on-site materials, and there are soils on-site which will meet the permeability requirements specified herein.

2. INSPECTION

- A. Verify which on-site soils are to be used as fill.
- B. Verify areas to be filled are free of topsoil, debris, snow, ice, or water, and ground surfaces are not frozen.

3. PREPARATION

- A. When directed by the Owner's representative, compact subgrade surfaces to density requirements for common fill material.
- B. When required by the Owner's representative, proofroll surfaces to receive fill with a loaded, tandem-axle dump truck. Cut out soft areas of subgrade which deflect excessively or are otherwise judged not readily capable of supporting the required load. Backfill with approved fill material and compact to 98 percent of the soils standard Proctor maximum dry density.

4. FILL PLACEMENT

- A. Fill (including two feet soil liner) to contours and elevations shown on Drawing No.5807-4, 5807-10, and 5807-11 of the project plans.
- B. Do not backfill over porous, wet, or spongy subgrade surfaces.
- C. Compact engineered fill placed within two feet around or over leachate collection system with hand guided equipment.
- D. Compact fill materials to a minimum of 98 percent standard Proctor maximum dry density (ASTM D698) in continuous layers not exceeding 4 inches loose depth for material to be compacted utilizing hand guided equipment.
- E. Compact fill materials to a minimum of 98 percent standard Proctor maximum dry density (ASTM D698) in continuous layers not exceeding 6 inches loose depth for material to be compacted utilizing self propelled or towed equipment.
- F. All fill shall be placed and compacted to a moisture content within -1 to +2 percent of the optimum moisture content as determined by ASTM D698.
- G. The two feet of soil designated as the clay liner (also referred to as the soil liner) should have material characteristics and should be compacted to such a degree that the soil has a coefficient of permeability of 1×10^{-7} cm/sec, or less. There are on-site soils capable of achieving the above permeability requirements when compacted to the above density requirements.

The soil liner should be constructed under the review of a professional engineer registered in the State of Alabama. A certification that the liner system was constructed as designed and as approved by ADEM, will need to be prepared by a registered engineer for the Owner.

The soils used in soil liner shall also meet the minimum following criteria:

- (1.) Be free of oversize particles, such as rocks, roots, limbs and other foreign substances which would alter the design integrity of the liner;
 - (2.) Be classified under the Unified Soil Classification System as CL, CH or SC (ASTM Standard D2 487-69);
 - (3.) Allow greater than 30 percent passage through a No. 200 sieve (ASTM Test D-1140);
 - (4.) Have a liquid limit equal to or greater than 30 units (ASTM Test D-423); and
 - (5.) Have a plasticity greater than or equal to 15 units (ASTM Test D-424).
- G. Maintain moisture content of fill materials within - 1 to + 2 percentage points of the optimum standard Proctor moisture.
- H. Make changes in grade gradual. Blend slopes into level areas.

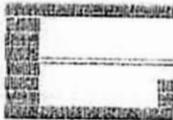
5. FIELD QUALITY CONTROL

- A. Compaction testing will be performed in accordance with ASTM D1556 or ASTM D2922 and under provisions required by the Authority's representative.
- B. If tests indicate work does not meet specified requirements, remove work and replace at no cost to Owner.
- C. The Owner will be responsible for all testing required by the specifications and drawings. As a minimum, documentation of at least one passing compaction test per 50,000 square feet of area per foot of fill shall be provided. The compaction of the soil liner should be documented at a frequency of at least one passing test per 20,000 square feet of area per foot of soil liner fill.

An undisturbed sample of compacted soil liner should be obtained at a frequency of one sample per acre per lift of soil. Laboratory test should be conducted on each sample to determine the following:

- . Natural moisture content
- . Particle size distribution
- . Liquid limit
- . Plasticity index
- . Coefficient of permeability.

APPENDIX H
LABORATORY CLASSIFICATION TEST RESULTS



GROUND ENGINEERING & TESTING SERVICE, INC.

AT TER BER G L I M I T T E S T S

PROJECT NAME : HURDN VALLEY LANDFILL

JOB NUMBER : B5807-001

CLIENT NAME :

DATE : 10-04-1991

SAMPLE IDENTIFICATION

AT TER BER G L I M I T T E S T R E S U L T S

TEST ##	BORING NUMBER	SAMPLE NUMBER	DEPTH FEET	MOISTURE PERCENT	LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX
1	BAG	LS-1	N/A		34	22	12
2	BAG	LS-2	N/A		24	16	8
3	BAG	LS-3	N/A		22	17	5
4	BAG	LS-4	N/A		63	33	30

RESPECTFULLY SUBMITTED

GROUND ENGINEERING & TESTING SERVICE, INC.
SIEVE GRAIN SIZE ANALYSIS

DATE: 10-04-1991

PROJECT NAME: HURON VALLEY LANDFILL PROJECT NUMBER: B5807-001
SAMPLE IDENTIFICATION: LS-1 BROWNISH YELLOW SILTY CLAY (CL) DATE RECEIVED: 09/30/91

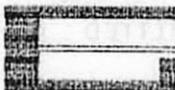
SIEVE ANALYSIS OF THE COARSE PORTION

SIZE SIEVE	WEIGHT RETAINED	PERCENT RETAINED	PERCENT PASSING
#200	115.85	13.22	86.78

LIQUID LIMIT = 34 PLASTIC LIMIT = 22 PI = 12

SOIL CLASSIFICATION : BROWNISH YELLOW SILTY CLAY (CL)

Respectfully Submitted,



GROUND ENGINEERING & TESTING SERVICE, INC.

LABORATORY MOISTURE-DENSITY RELATIONSHIP

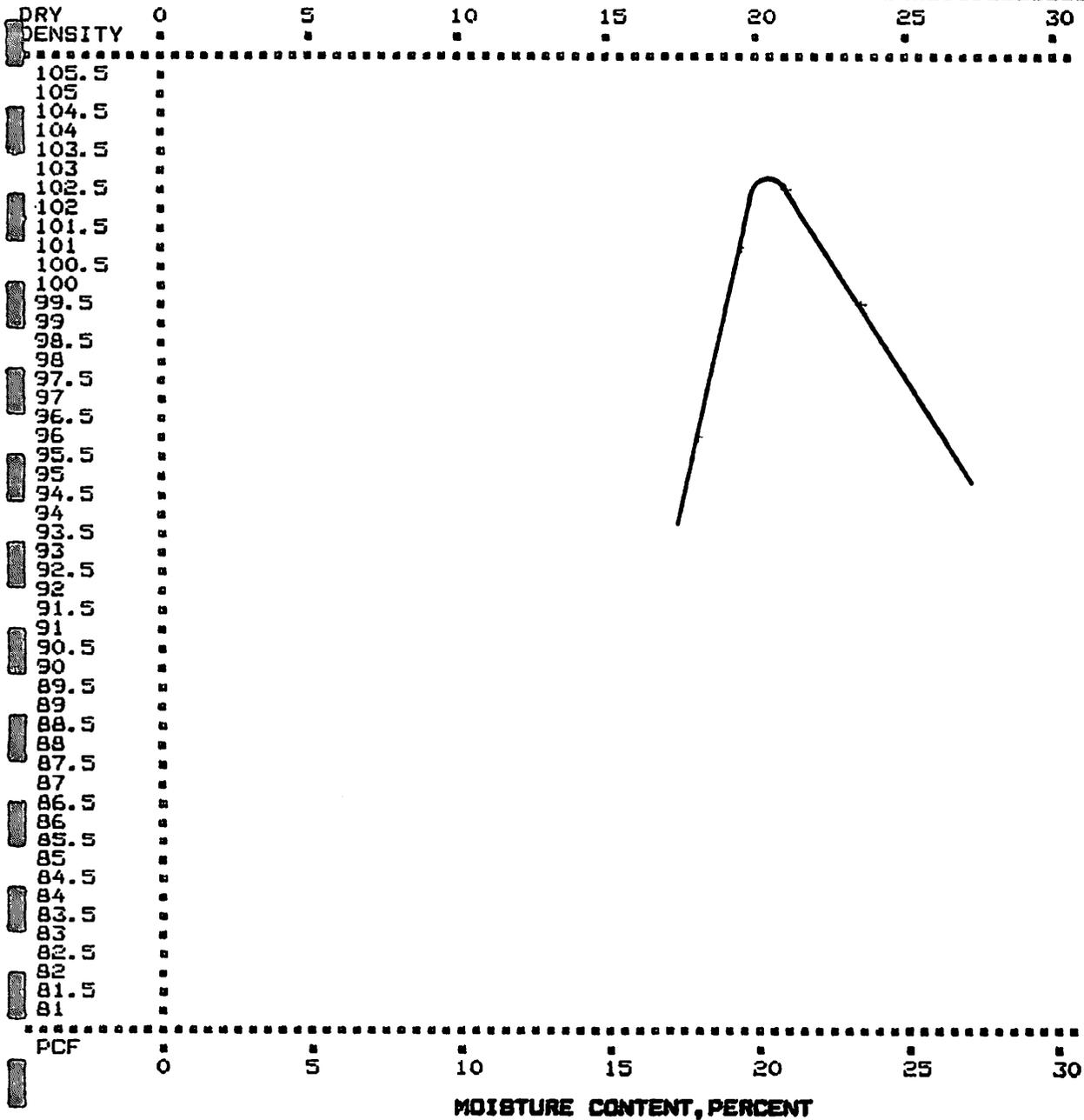
PROJECT NAME: HURON VALLEY LANDFILL
 SAMPLE NO: LS-1 BORING: BAG

DEPTH: N/A

JOB NUMBER: B5807-001
 DATE: 10-04-1991

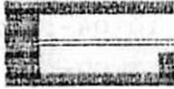
SOIL DESCRIPTION: BROWNISH YELLOW SILTY CLAY (CL)

TEST METHOD: ASTM D698-A



MAXIMUM DRY DENSITY (PCF) 102.8 OPTIMUM MOISTURE (%) 20.5
 LIQUID LIMIT= 34 PLASTIC LIMIT= 22 PLASTICITY INDEX= 12

GROUND ENGINEERING & TESTING SERVICE, INC.



GROUND ENGINEERING & TESTING SERVICE, INC.

4764 FIRST AVE. NORTH
BIRMINGHAM, ALABAMA

CONSTANT HEAD PERMEABILITY

DATE: 10-10-1991

PROJECT NAME: HURON VALLEY LANDFILL

PROJECT NUMBER: B5807-001

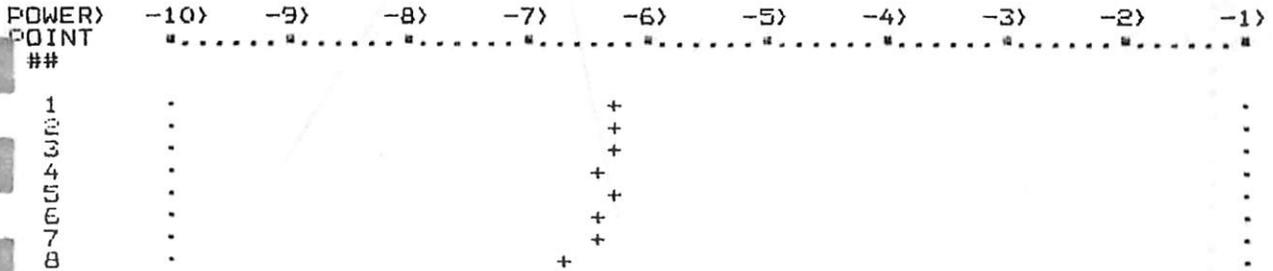
BORING NUMBER: BAG

DRY DENSITY (PCF): 100.7

MOISTURE (%): 22.5

SAMPLE IDENTIFICATION: LS-1 REMOLDED AT 98% AT OPTM.+2%

GRAPHIC DISPLAY of CONSTANT HEAD PERMEABILITY



POWER) -10) -9) -8) -7) -6) -5) -4) -3) -2) -1)

COEFFICIENT of PERMEABILITY x 10 ^ POWER (log 10 scale)

 COEFFICIENT of PERMEABILITY (20 DEG. C) = 2.75E-07 Cm/Sec

TEST PROCEDURE: CORPS ENGINEERS EM 1110-2-1906 APPENDIX VII or
ASTM D5084 with FLEXABLE MEMBRANE & BACK PRESSURE SATURATION

GROUND ENGINEERING & TESTING SERVICE, INC.
SIEVE GRAIN SIZE ANALYSIS

DATE: 10-04-1991

PROJECT NAME: HURON VALLEY LANDFILL PROJECT NUMBER: B5807-001
SAMPLE IDENTIFICATION: LS-2 WHITE CLAYEY SAND (SC) DATE RECEIVED: 09/30/91

SIEVE ANALYSIS OF THE COARSE PORTION

SIZE SIEVE	WEIGHT RETAINED	PERCENT RETAINED	PERCENT PASSING
#200	468.95	53.9	46.1

LIQUID LIMIT = 24 PLASTIC LIMIT = 16 PI = 8

SOIL CLASSIFICATION : WHITE CLAYEY SAND (SC)

Respectfully Submitted,

GROUND ENGINEERING & TESTING SERVICE, INC.

LABORATORY MOISTURE-DENSITY RELATIONSHIP

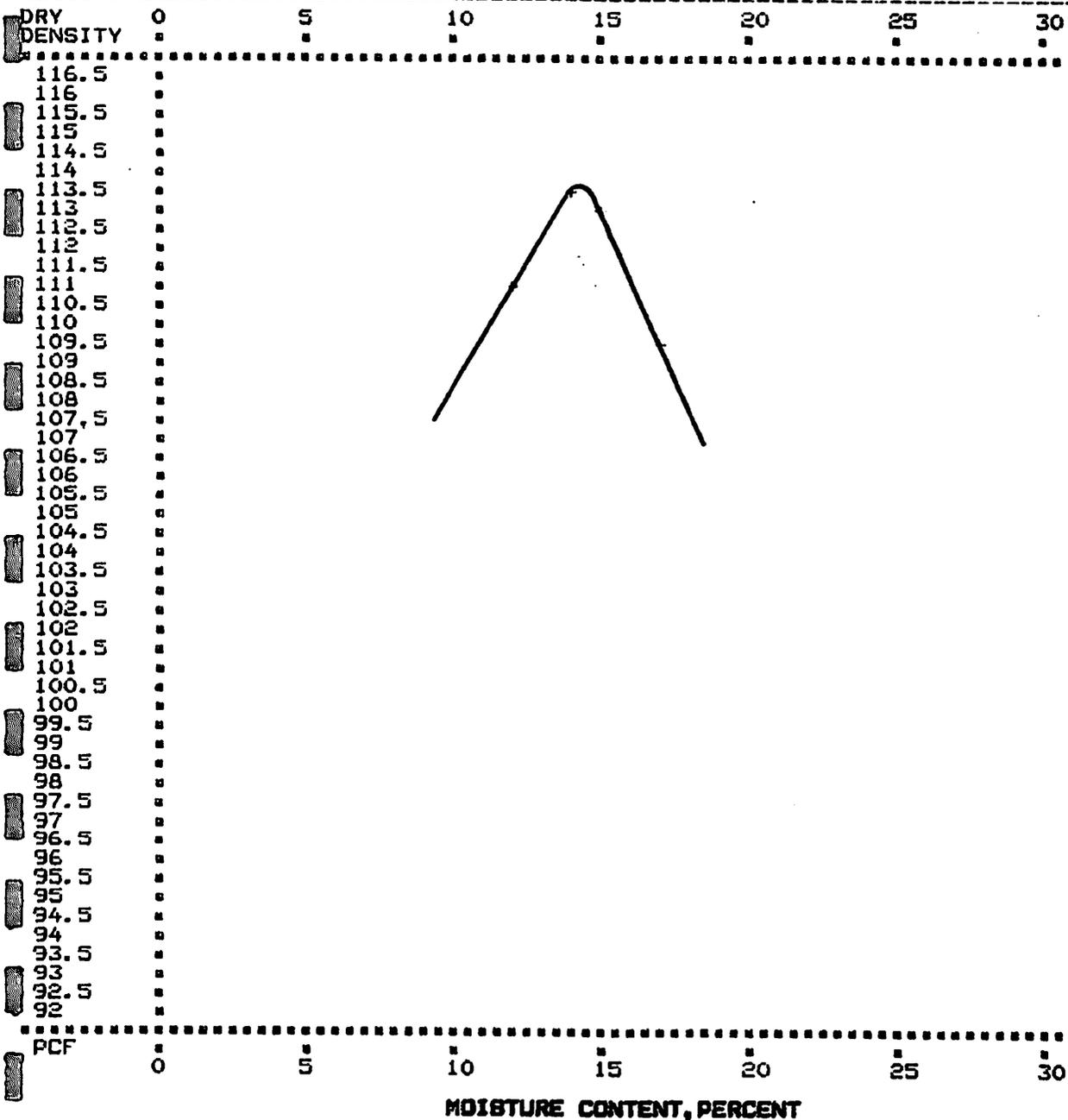
PROJECT NAME: HURON VALLEY LANDFILL
 SAMPLE NO: LS-2 BORING: BAG

DEPTH: N/A

JOB NUMBER: B5807-001
 DATE: 10-04-1991

SOIL DESCRIPTION: WHITE CLAYEY SAND (SC)

TEST METHOD: ASTM D698-A



MAXIMUM DRY DENSITY (PCF) 113.7 OPTIMUM MOISTURE (%) 14.4
 LIQUID LIMIT= 24 PLASTIC LIMIT= 16 PLASTICITY INDEX= 8

GROUND ENGINEERING & TESTING SERVICE, INC.



GROUND ENGINEERING & TESTING SERVICE, INC.

4764 FIRST AVE. NORTH
BIRMINGHAM, ALABAMA

CONSTANT HEAD PERMEABILITY

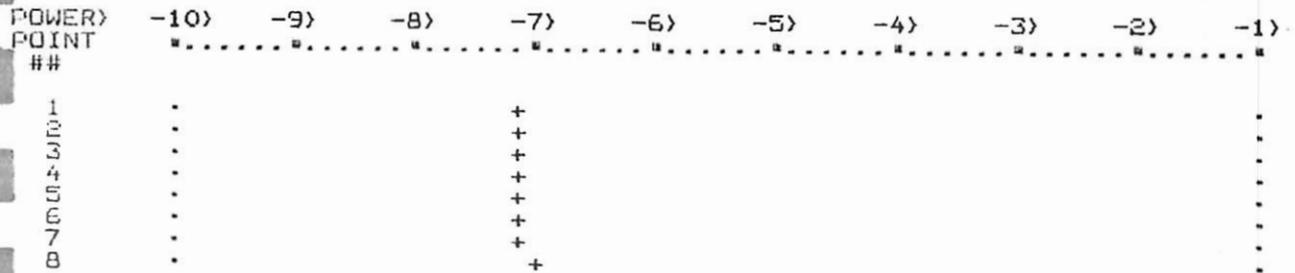
DATE: 10-10-1991

```

=====
PROJECT NAME: HURON VALLEY LANDFILL                PROJECT NUMBER: B5807-001
BORING NUMBER: BAG          DRY DENSITY (PCF): 111.4    MOISTURE (%): 16.4
SAMPLE IDENTIFICATION: LS-2 REMOLDED AT 98% AT OPTM.+2%
=====

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GRAPHIC DISPLAY of CONSTANT HEAD PERMEABILITY



```

=====
POWER) -10) -9) -8) -7) -6) -5) -4) -3) -2) -1)
        .....
        COEFFICIENT of PERMEABILITY x 10 ^ POWER (log 10 scale)
=====

```

 COEFFICIENT of PERMEABILITY (20 DEG. C)=9.40E-08 Cm/Sec

TEST PROCEDURE: CORPS ENGINEERS EM 1110-2-1906 APPENDIX VII or
ASTM D5084 with FLEXABLE MEMBRANE & BACK PRESSURE SATURATION

GROUND ENGINEERING & TESTING SERVICE, INC.
SIEVE GRAIN SIZE ANALYSIS

DATE: 10-04-1991

PROJECT NAME: HURON VALLEY LANDFILL PROJECT NUMBER: B5807-001
SAMPLE IDENTIFICATION: LS-3 LIGHT BROWNISH GREY SILTY CLAY (CL)
DATE RECEIVED: 09/30/91

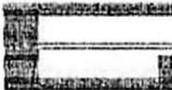
SIEVE ANALYSIS OF THE COARSE PORTION

SIZE SIEVE	WEIGHT RETAINED	PERCENT RETAINED	PERCENT PASSING
#200	151.71	23.39	76.61

LIQUID LIMIT = 22 PLASTIC LIMIT = 17 PI = 5

SOIL CLASSIFICATION : LIGHT BROWNISH GREY SILTY CLAY (CL)

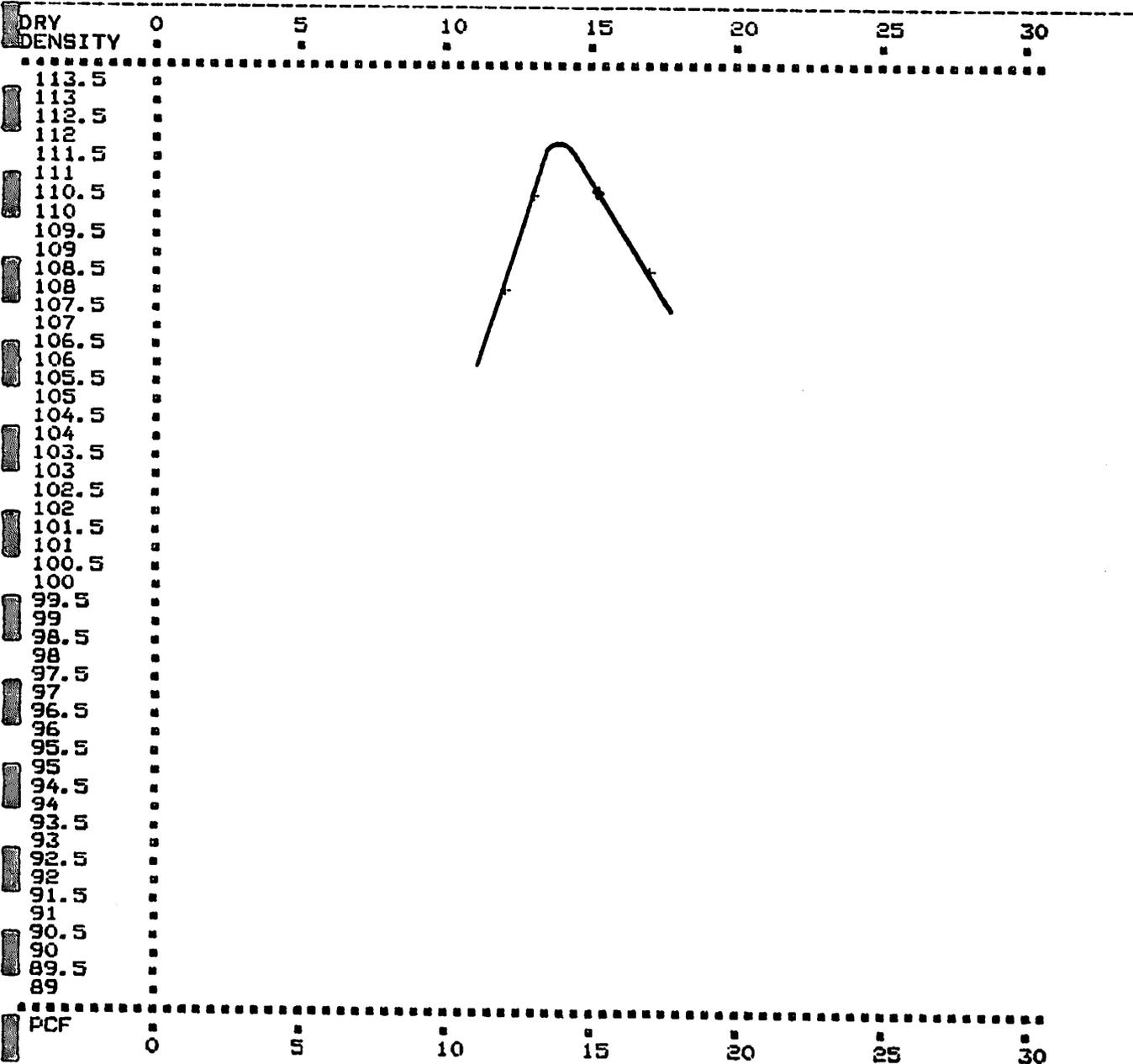
Respectfully Submitted,



GROUND ENGINEERING & TESTING SERVICE, INC.

LABORATORY MOISTURE-DENSITY RELATIONSHIP

PROJECT NAME: HURON VALLEY LANDFILL JOB NUMBER: B5807-001
 SAMPLE NO: LS-3 BORING: BAG DEPTH: N/A DATE: 10-04-1991
 SOIL DESCRIPTION: LIGHT BROWNISH GREY SILTY CLAY (CL) TEST METHOD: ASTM D698-A



MAXIMUM DRY DENSITY (PCF) 111.8 OPTIMUM MOISTURE (%) 13.9
LIQUID LIMIT= 22 PLASTIC LIMIT= 17 PLASTICITY INDEX= 5

GROUND ENGINEERING & TESTING SERVICE, INC.

GROUND ENGINEERING & TESTING SERVICE, INC.
SIEVE GRAIN SIZE ANALYSIS

DATE: 10-04-1991

PROJECT NAME: HURON VALLEY LANDFILL PROJECT NUMBER: B5807-001
SAMPLE IDENTIFICATION: LS-4 VERY PALE BROWN PLASTIC SILT (MH) DATE RECEIVED: 09/30/91

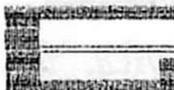
SIEVE ANALYSIS OF THE COARSE PORTION

<u>SIZE SIEVE</u>	<u>WEIGHT RETAINED</u>	<u>PERCENT RETAINED</u>	<u>PERCENT PASSING</u>
#200	24.35	3.94	96.06

LIQUID LIMIT = 63 PLASTIC LIMIT = 33 PI = 30

SOIL CLASSIFICATION : VERY PALE BROWN PLASTIC SILT (MH)

Respectfully Submitted,



GROUND ENGINEERING & TESTING SERVICE, INC.

GROUND ENGINEERING & TESTING SERVICE, INC.

4764 FIRST AVE. NORTH
BIRMINGHAM, ALABAMA

CONSTANT HEAD PERMEABILITY

DATE: 10-10-1991

PROJECT NAME: HURON VALLEY LANDFILL

PROJECT NUMBER: B5807-001

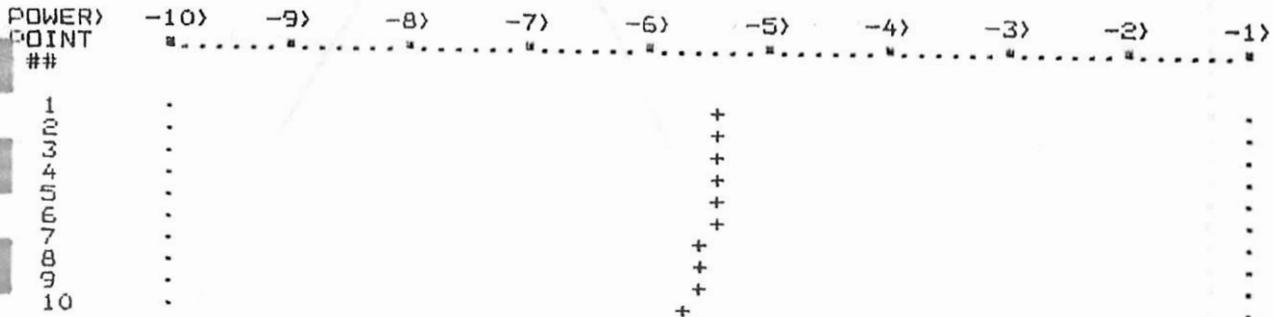
BORING NUMBER: BAG

DRY DENSITY (PCF): 87.8

MOISTURE (%): 29.4

SAMPLE IDENTIFICATION: LS-4/ REMOLDED AT 98% AT OPTM.

GRAPHIC DISPLAY of CONSTANT HEAD PERMEABILITY



COEFFICIENT of PERMEABILITY x 10 ^ POWER (log 10 scale)

COEFFICIENT of PERMEABILITY (20 DEG. C) = 2.28E-06 Cm/Sec

TEST PROCEDURE: CORPS ENGINEERS EM 1110-2-1906 APPENDIX VII or
ASTM D5084 with FLEXIBLE MEMBRANE & BACK PRESSURE SATURATION

W. Z. BAUMGARTNER & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS

P.O. BOX 786 • BRENTWOOD, TN 37024
500 WILSON PIKE CIRCLE • SUITE 206 • BRENTWOOD, TN 37027
615-373-1572 • FAX: 615-370-9292

August 18, 1998

Mr. Archie M. Pennington
Solid Waste Branch
Alabama Department of Environmental Management
1751 Cong. W.L. Dickinson Drive
Montgomery, AL 36109-2608

RE: Huron Valley Steel Corporation
Anniston, Alabama
Permit No. 08-18

Dear Mr. Pennington:

Huron Valley Steel Corporation (HVSC) has requested the assistance of W.Z. Baumgartner & Associates, Inc., Environmental Consultants in development of acceptable management alternatives for the solid waste landfill operated by HVSC. At issue is the frequency of cover for wastes deposited in the facility. Permit No. 08-18, issued by the Land Division July 31, 1992 and renewed January 9, 1998, calls for weekly cover of wastes. The following is presented for your consideration in modification of the existing permit to allow for less frequent covering of waste.

Current Operation

Waste material delivered to the landfill facility consists of non-metallic remnants from metals recovery activities of HVSC. This material consists of wood, plastic, rubber, foam rubber, fabric, glass, rock and soil separated from scrap metal recycling residue delivered to the Ware Street facility. This solid waste is transported to and placed in the landfill using tandem axle dump trucks. The waste does not contain any putrescible matter, does not harbor or attract vermin or vectors, is relatively odor-free and is not displaced by wind or precipitation.

Conventional earthmoving equipment is used to level and compact the waste within the landfill cell. Earthen berms are used to section landfill cells to minimize the exposed working area and reduce leachate generation. Intermediate and final cover layers are placed, as appropriate, upon reaching design slopes and elevations. Based on material generation rates, individual landfill cells are filled within an eight (8) to ten (10) month period.

Proposed Modification

HVSC will continue to operate the landfill in a manner consistent with that represented above. We have recommended to HVSC the use of residue from the material prep line as an alternative cover material. The material in question, which is discharged from the scrap pre-prep separator with cyclone, Air Division Permit No. 301-0032-X010, is a non-metallic residue which contains fabric, foam rubber, glass, rock, miscellaneous debris and soil. This residue contains considerably less plastic and rubber than does waste material from other processes. The residue does not contain any putrescible matter, does not harbor

Mr. Archie M. Pennington
Page Two
August 18, 1998

or attract vermin or vectors, is relatively odor-free and, due to its fibrous consistency, is not readily displaced by wind or precipitation. W.Z. Baumgartner & Associates, Inc. has recommended to HVSC that material prep line residue be applied to the surface of landfilled waste every six (6) months. Residue should be applied and consolidated to a depth of six (6) inches using existing landfill equipment.

W.Z. Baumgartner & Associates, Inc. has recommended the use of similar processing residues as daily cover in municipal landfills across the United States. In the states of Florida and Wisconsin, these beneficial uses are included in regulation and in Florida count toward state mandated recycling objectives. Similar uses have been approved in Maryland, Massachusetts, New Hampshire, New York and Virginia.

Residue placed in six (6) inch layers in accordance with Solid Waste Management Regulations, AAC 335-13-4.22 and .23 should perform in a manner similar to traditional cover materials, i.e. soil. Because the residue has the ability to rebound following application of wheel loadings and is resistant to displacement by traffic, either during placement of the residue or delivery of solid waste, the cover layer can be developed with a decreased volume of material and can be maintained in traffic areas with little or no maintenance required. Landfill operations during periods of wet weather are often hampered by the application of clayey cover soils. Rubber-tired and tracked equipment can operate on residue during all weather conditions.

Flammability

The Division has expressed concern over potential flammability issues with the wastes placed in the HVSC landfill. In the past six (6) years of landfill operation, only one (1) event requiring response by HVSC staff has occurred. HVSC responded immediately and controlled the situation within a matter of hours. In addition, HVSC involved qualified environmental professionals in assessment of the event and site management controls have been developed to minimize the opportunity for recurrence.

Cover materials should resist combustion and provide separation of waste materials within a given landfill cell. To assess the flammability of residue proposed for use as cover, a representative of W.Z. Baumgartner & Associates, Inc. visited the HVSC site and conducted an assessment of material performance. An expanded mesh support frame, measuring two (2) feet by four (4) feet by six (6) inches in depth was filled with material prep line residue and lightly compacted by hand. A flame source, consisting of scrap oak pallet material, was ignited and allowed to become fully involved. Once a substantial volume of coals had been obtained, additional oak scrap was added to ensure the residue was exposed to intense heat as well as open flame for the duration of the assessment.

The support frame and residue were positioned on top of structural steel supports such that the open flame was in direct contact with the material. The support frame remained in this position for approximately five (5) minutes. At that time, the support frame was removed, the structural steel supports were pushed aside and the support frame was returned to and placed directly on top of the flame source. The support frame remained in this position for approximately five (5) minutes, at which time the frame was removed and inverted to assess the material on the underside of the support frame. Much of the material in direct contact with the flame source was charred and a number of materials appeared to have melted. A single piece of wood and a few lightweight rubber fragments did ignite. However, at no time during the assessment was any flame breakthrough of the material surface observed. A video of the demonstration is provided for your review.

Mr. Archie M. Pennington
Page Three
August 18, 1998

Contingency

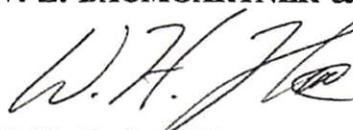
HVSC has access to approximately 235 acres of undisturbed land and a minimum of 25 acres of cleared land at any given time for borrow of clay soil should cover soils be required for maintenance of outslopes or other areas. In addition, numerous storm water ponds provide access to substantial volumes of water for fire control. Access to these soils, water, heavy equipment and proximity to the HVSC plant should serve to minimize any concerns the Division may have regarding the ability of HVSC to respond to any emergency condition at the landfill.

Huron Valley Steel Corporation has made every effort to operate the landfill facility in an efficient, effective and conscientious manner. Based upon the operational history of the facility and absence of deficiencies or violations noted by Division inspectors, we believe the current fill and cover practices to be reasonable and the weekly cover requirement unnecessary. As a reasonable compromise, Huron Valley Steel Corporation requests the cover requirement be amended to every six (6) months and specifically allow the use of the material prep line residue. (2)

We sincerely appreciate your assistance in this matter. If you have any questions, please do not hesitate to call.

Very Truly Yours,

W. Z. BAUMGARTNER & ASSOCIATES, INC.



W. H. Tucker, III
Project Manager

WHT/ph/96020.amp

Enclosure

cc: Mr. Richard Anderson
Mr. Tom Bonds

Memorandum



HURON VALLEY STEEL CORPORATION
820 WARE STREET • ANNISTON, ALABAMA 36201

Date: 1/6/99
Subject: M.P.L. residue as quarterly landfill cover
To: Dick Anderson, Archie Pennington (ADEM)
From: Tom Bonds

In order for Huron Valley Steel to use the residue from the Material Prep. Line (M.P.L.) as an alternative cover material the following proposed operating procedures should be implemented. This cover will be applied to active cells of landfill once every 3 months. Depending upon the size of the area to be covered, M.P.L. residue will be saved and stored at the plant site prior to being hauled to landfill. It will take approximately 24.5 truckloads of M.P.L. residue to cover 1 acre of fill 6" thick.

Huron Valley Steel proposes to remove from the waste stream up to 25% of the M.P.L. residue and store it for use as quarterly cover. This would make available approximately 51 truckloads of M.P.L. residue for use as quarterly cover under current business conditions. This would cover approximately 2.1 acres of fill.

If the fill area to be covered exceeds the capacity of the M.P.L. to produce cover material, Huron valley Steel will use soil at the landfill site to supplement the M.P.L. residue. This soil at the landfill site will also serve as the cover material should business conditions occur that might render the M.P.L. unsuitable for use as cover.

Currently Huron Valley Steel hauls a mix of approximately 50% M.P.L. residue and 50% Light Media Plant (L.M.P.) residue to the landfill. Huron Valley Steel has concluded that removing up to 25% of the M.P.L. residue to be used as quarterly cover, will not adversely affect the compaction of the landfill.

If there are any question concerning this proposal please contact Tom Bonds (256) 238-9127.

Sincerely,

A handwritten signature in cursive script that reads "Tom Bonds".

Tom Bonds

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

POST OFFICE BOX 301463 ♦ 1751 CONG. W. L. DICKINSON DRIVE 36109-2608

MONTGOMERY, ALABAMA 36130-1463

WWW.ADEM.STATE.AL.US

(334) 271-7700

JAMES W. WARR
DIRECTOR

January 11, 1999

FOB JAMES, JR.
GOVERNOR

Facsimiles: (334)

Administration: 271-7950

Air: 279-3044

Land: 279-3050

Water: 279-3051

Groundwater: 270-5631

Field Operations: 272-8131

Laboratory: 277-6718

Education/Outreach: 213-4399

Mr. Tom Bonds, Plant Engineer
Huron Valley Steel Corporation
820 Ware Street
Anniston, Alabama 36201

Dear Mr. Bonds:

Re: Huron Valley Steel Corporation (08-18)
Request for Variance to Cover Requirement

On December 15, 1998, Mr. Archie Pennington discussed the variance to cover requirements with you and Mr. Dick Anderson. This request was submitted by W. Z. Baumgartner & Associates, Environmental Consultants, on behalf of HVSC in their letter of August 18, 1998. In this letter it was recommended that HVSC use the residue from the material prep line (MPLR) as an alternate cover material (this material was said to be about 58% soil and to contain less plastic and rubber than material from the other processes). It was requested that the cover requirement be every six (6) months and allow the use of the material MPLR for interim cover.

The Department has confirmed that the use of MPLR for cover is authorized in some states for landfills that have liners, a leachate recovery system and groundwater monitoring wells.

HVSC has all these factors and has demonstrated the difficulty of igniting the MPLR, therefore the Department grants HVSC a variance to soil cover for this facility to three (3) month intervals with the provisions that:

1. That MPLR be mixed with the remainder of the automobile shredding residue (ASR) disposed of in the facility to retard flammability and to aid in the compaction of the waste.
2. That good compaction practices be maintained at the facility.
3. That a large stockpile of clay be maintained at an accessible location for the purposes of extinguishing possible landfill fires and for use as a cover where an insufficient amount of MPLR is available for adequate cover.
4. That a six (6) inch layer of clay be used when insufficient MPLR is available.

Birmingham Branch
110 Vulcan Road
Birmingham, Alabama 35209-4702
(205) 942-6168
(205) 941-1603 [Fax]

Decatur Branch
400 Well Street, N.E. ♦ P.O. Box 953
Decatur, Alabama 35602-0953
(256) 353-1713
(256) 340-9359 [Fax]

Mobile Branch
2204 Perimeter Road
Mobile, Alabama 36615-1131
(334) 450-3400
(334) 479-2593 [Fax]

Mobile Branch - Coastal Section
4171 Commanders Drive
Mobile, Alabama 36615-1421
(334) 432-6533
(334) 432-6598 [Fax]

Printed on Recycled Paper



5. That the guidelines set out in the HVSC memorandum of January 6, 1999 outlining the proposed operating practices for the use of MPLR as cover be rigorously followed.

This variance may be rescinded or modified should conditions at the landfill indicate that it is not accomplishing the desired results or there is a perceived danger to the environment or to public health.

Should you have any questions please call Mr. Archie Pennington at 334-270-5605.

Sincerely,



Wm. Gerald Hardy, Chief
Land Division

WGH/AMP/ghs

C: Mr. Richard Anderson
Mr. W. H. Tucker III

LPC Technologies

May 20, 2019

Mr. Eric Sanderson, Chief Solid Waste Branch
Alabama Dept of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110

RE: Proposed Permit Modification Application
Huron Valley Industrial Landfill, Permit No. ILF/08-18
Calhoun County, Alabama

Dear Mr. Sanderson:

On behalf of Huron Valley Steel Corporation, I hereby submit the below-listed documents relating to a proposed modification of the current permit for the landfill. Specifically:

Huron Valley Industrial Landfill (Permit No. 08-18) requests variance from ADEM Rule 335-13-4-.20(2) (c) 2., to change the permitted final slope from 4(H):1(V) to 3(H):1(V). Additionally, Huron Valley Industrial Landfill submits a request for minor modification to the permitted plans to account for the change in final slope.

7

- Application Form (3 copies);
- Application Fee in the amount of \$1460.00 (Minor Mod.);
- Variance Request Fee in the Amount of \$1460.00;
- Engineering Plans-12 Sheets, by LPC Technologies, 5/10/19 (3 copies);
- Cover Slope Erosion Stability Analysis (Issue Date 5/2/2019);
- List of Adjacent Property Owners (May 2019).

I appreciate your assistance with this matter. Please call if you have any questions.

Sincerely,
LPC Technologies



Patrick L. Chumbley P.E.
Ala. Registration No. 19181

Cc: Tom Bonds, HVSC w/attachments; Preston Waid, ADEM w/ Cover Letter Only

LPC Technologies

5184 Caldwell Mill Road, Ste 204-261 • Birmingham, AL 35244 • Phone:(205)253-0268
patchumbley@gmail.com

Analysis of Slope Erosion & Stability of the Final Cover (May 2019)

1.0 Cover Stability Analysis Scope

This analysis utilizes the NRCS program RUSLE2, or Revised Universal Soil Loss Equation Version.2, to perform basic analysis of soil detachment on two geometrically different slopes. Per ADEM regulations no more than 20 vertical feet may be between storm water terraces along the finished slopes of a landfill. The two slope geometries analyzed are for a 4H: 1V slope and a 3H: 1V slope. Due to the vertical requirement the slope lengths vary between the two conditions resulting in an 80 foot long slope for the 4H:1V configuration and a 60 foot long slope for the 3H:1V configuration.

2.0 Cover Stability Analysis

2.1 Inputs

This analysis utilizes the NRCS program RUSLE2, or Revised Universal Soil Loss Equation Version 2. Basic analysis in RUSLE2 requires four main inputs:

- Climate,
- Soil type,
- Topographic condition (slope) and,
- Management condition (vegetative cover).

2.1.1 Climate

The modeling site is the Huron Valley Industrial Landfill. The landfill is located near Anniston, AL in Calhoun County. As such the climate value was set to the specific values for Etowah County, since no program data exists for Calhoun County. Further, Etowah County is located adjacent to Calhoun County and has similar soil and climate conditions. This is shown as the "Location" input of the RUSLE2 dashboard for each configuration. This value is the same for both models.

2.1.2 Soil

Since analysis is being performed for final slope configurations the uppermost layer of soil will be local topsoil. Per the NRCS the most likely soil to be used for topsoil in Calhoun County at the landfill would be the M-H OM 50% clay type, which is available on the landfill property. As such this soil is selected from the RUSLE2 database for use and can be seen in the Soil input of the RUSLE2 dashboard for each configuration. This value is the same for both models.

2.1.3 Topography

There are two geometries being considered for this analysis: an 80 foot long 4H: 1V slope and a 60 foot long 3H: 1V slope. In order to determine the average slope steepness, the 10 feet wide terrace/bench was included in the calculations. The results are an average slope of 22% for the 4H: 1V slope and 29% for 3H: 1V slope. As such, both of these were inputted into RUSLE2 and can be seen as the Slope Length and Average Slope Steepness input field of the RUSLE2 dashboard for each configuration.

2.1.4 Management

The management is the condition along the top of soil. These analyses are for final slope conditions and therefore the condition would be a fully grassed slope. As such, the value of Southern Grass was used and further revised to reflect grass types for the Southern US. This can be seen in the Base Management input field of the RUSLE2 dashboard for each configuration.

3.0 Results

The models yield a sediment delivery value of tons/acre/year. The 4H:1V scenario yielded a value of 1.6 ton/ac/yr. The 3H:1V scenario yielded a value of 1.7 ton/ac/yr, indicating a nominal increase of 0.1 ton/ac/yr between the two slope geometries. Both of these soil runoff values are very low and indicate the management of a fully grassed slope, as required by ADEM Administrative Code, will yield a negligible increase in sediment transport for the 3:1 configuration as compared to the 4:1 configuration. (Refer to Exhibits 1.0 and 2.0)

Respectfully Submitted,



Patrick L. Chumbley, PE
Alabama Registration 19181



Attachments:

- Exhibit 1.0 - 4H:1V Final Cover Slope, RUSL2 Dashboard
- Exhibit 2.0 - 3H:1V Final Cover Slope, RUSL2 Dashboard

Exhibit 1.0

Analysis of Slope Erosion & Stability of the Final Cover Huron Valley Steel Industrial Landfill (May 2019)

4H:1V FINAL COVER SLOPE
RUSL2 DASHBOARD
Sediment Delivery = 1.6 Ton/Ac.

RUSLE2 Version 2.6.1.9 (May 18 2016) - [Profile: Highly disturbed land\Commercial Site post construction HVSC INDUSTRIAL LANDFILL 0501 2019 - 4-1 CONFIG]

File Database Edit View Options Tools Window Help

Auto update

STEP 1: Choose location to set climate: Location: Alabama\Etowah county average (Gadsden)

STEP 2: Choose soil type: Soil: s By Texture\clay\clay (m.h.O.M. vs perm. # 50% clay)

STEP 3: Set slope topography: Slope length (ft): 80 Avg. slope steepness: 22

STEP 4a: Select base management: Base management: s\long term vegetation\southern grass seeded May 15

STEP 4b: Modify/build man. sequence if desired: Rotation builder: Rotation builder

STEP 4c: adjust management inputs if desired: Adjust yields: Yield

STEP 5: Set supporting practices:

Contouring: a not contoured

Vegetative Barriers and Diversion, Terraces, Sediment Basins: none

2 0.5% grade terrace at bottom

Results

Soil loss for cons. plan, t/ac/yr	4.2	Info
Sediment delivery, t/ac	1.6	
Net event runoff, in/yr	2.2	

LPC Technologies

5184 Caldwell Mill Road, Suite 204 • Birmingham, AL 35244

Exhibit 2.0

Analysis of Slope Erosion & Stability of the Final Cover Huron Valley Steel Industrial Landfill (May 2019)

3H:1V FINAL COVER SLOPE
RUSL2 DASHBOARD
Sediment Delivery = 1.7 Ton/Ac.

RUSLE2 Version 2.6.1.9 (May 18 2016) - [Profile: Highly disturbed land/Commercial Site post construction HVSC INDUSTRIAL LANDFILL 0501 2019 3 1 CONFIG]
File Database Edit View Options Tools Window Help
Auto update

STEP 1: Choose location to set climate: Location

STEP 2: Choose soil type: Soil

STEP 3: Set slope topography: Slope length (horiz), ft Avg. slope steepness,

STEP 4a: Select base management: Base management

STEP 4b: Modify/build man. sequence if desired: Rotation builder

STEP 4c: adjust management inputs if desired: Adjust yields

STEP 5: Set supporting practices:
Contouring
Vegetative Barriers and Diversion, Terraces, Sediment Basins

Results

Soil loss for cons. plan, t/ac/yr	<input type="text" value="4.9"/>	Info	<input type="text"/>
Sediment delivery, t/ac	<input type="text" value="1.7"/>		
Net event runoff, in/yr	<input type="text" value="22"/>		

LPC Technologies

5184 Caldwell Mill Road, Suite 204 • Birmingham, AL 35244

LANCE R. LEFLEUR
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 30, 2019

Mr. Thomas P. Bonds
V.P. Operations
820 Ware Street
Anniston, AL 36201

RE: Huron Valley Industrial Landfill
Permit No. 08-18 Modification

Dear Mr. Bonds:

Enclosed is the Solid Waste Disposal Facility Permit for the Industrial Landfill known as Huron Valley Industrial Landfill. The modified permit is effective July 30, 2019, and the expiration date shall remain December 7, 2023.

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

Sincerely,

A handwritten signature in black ink, appearing to read "S. Scott Story", is written over a horizontal line.

S. Scott Story, Chief
Solid Waste Engineering Section
Land Division

SSS/hb

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

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



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

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



SOLID WASTE DISPOSAL FACILITY PERMIT

PERMITTEE: Huron Valley Steel Corporation

FACILITY NAME: Huron Valley Industrial Landfill

FACILITY LOCATION: Southeast ¼ of Section 34, Township 15 South, Range 7 East in Calhoun County, Alabama. The facility consists of 242.4 acres with 125.9 acres approved for disposal.

PERMIT NUMBER: 08-18

PERMIT TYPE: Industrial Landfill

WASTE APPROVED FOR DISPOSAL: Nonhazardous industrial wastes including soil, rock, plastic, rubber, glass, fibrous materials, and residues from the resource recovery plant

MAXIMUM AVERAGE WASTE VOLUME: 2,000 tons per day

SERVICE AREA: Huron Valley Steel Recycling Facility

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

ISSUANCE DATE: December 7, 2018

EFFECTIVE DATE: December 8, 2018

MODIFICATION DATE: July 30, 2019

EXPIRATION DATE: December 7, 2023


Alabama Department of Environmental Management

FINAL DETERMINATION

PERMIT MODIFICATION

Huron Valley Steel Corporation
820 Ware Street
Anniston, Alabama 36201

Huron Valley Industrial Landfill
Permit No. 08-18

July 30, 2019

Huron Valley Steel Corporation has submitted to the Alabama Department of Environmental Management (ADEM) an application for modification and a variance request for the solid waste disposal facility permit for the industrial landfill known as Huron Valley Industrial Landfill (Permit 08-18). The Permittee is granted a variance from Rule 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1. The modification will update the final grading plan to incorporate 3:1 final slopes. The waste stream for the Huron Valley Industrial Landfill shall remain nonhazardous industrial wastes including soil, rock, plastic, rubber, glass, fibrous materials, and residues from resource recovery plants. The service area for the Huron Valley Industrial Landfill would remain Huron Valley Steel Recycling Facility in Anniston, Alabama. The maximum average daily volume of waste disposed at the Huron Valley Industrial Landfill would remain 2,000 tons per day. All other permit conditions will remain the same.

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The Huron Valley Industrial Landfill is described as being located in the Southeast ¼ of Section 34, Township 15 South, Range 7 East in Calhoun County, Alabama. Huron Valley Industrial Landfill consists of 242.4 acres with 125.9 acres approved for disposal.

The Solid Waste Branch has determined that the permit application complies with the requirements of ADEM's Administrative Code Division 13 regulations for an industrial landfill.

Technical Contact:

Hunter Baker
Solid Waste Engineering Section
Land Division
(334) 270-5607

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

Permittee: Huron Valley Steel Corporation
820 Ware Street
Anniston, Alabama 36201

Landfill Name: Huron Valley Industrial Landfill

Landfill Location: Southeast ¼ of Section 34, Township 15 South, Range 7 East in
Calhoun County, Alabama

Permit Number: 08-18

Landfill Type: Industrial Landfill

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

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

This permit is based on the information submitted to the Department on May 31, 2018, on May 21, 2019, and as amended, and is to be 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 December 8, 2018, as modified on July 30, 2019, and shall remain in effect until December 7, 2023 unless suspended or revoked.


Alabama Department of Environmental Management

7/30/19
Date Signed

SECTION I. STANDARD CONDITIONS

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

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

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

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

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

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

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 the Department, shall be signed and certified by the owner as follows:
1. If an individual, by the applicant.
 2. If a city, county, or other municipality or governmental entity, by the ranking elected official, or by a duly authorized representative of that person.
 3. If a corporation, organization, or other legal entity, by a principal executive officer, of at least the level of Vice President, or by a duly authorized representative of that person.
- L. **Confidential Information.** The Permittee may claim information submitted as confidential if the information is protected under Code of Alabama 1975 §§ 22-39-18, as amended.
- M. **State Laws and Regulations.** Nothing in this permit shall be construed to preclude the initiation of any legal action or to relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation.

SECTION II. GENERAL OPERATING CONDITIONS

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

- E. Industrial Waste Disposal. The Permittee shall dispose of industrial waste as required by ADEM Admin. Code 335-13-4-.21(1)(c), and as specified in the Application.
- F. Boundary Markers. The Permittee shall ensure that the facility is identified with a sufficient number of permanent boundary markers that are at least visible from one marker to the next.

SECTION III. SPECIFIC REQUIREMENTS FOR INDUSTRIAL WASTE LANDFILLS

A. Waste Identification and Management.

1. Subject to the terms of this permit, the Permittee may accept for disposal the nonhazardous solid wastes listed in III.B. Disposal of any other wastes is prohibited, except waste granted a temporary or one-time waiver by the Director.
2. The total permitted facility for the Huron Valley Industrial Landfill is 242.4 acres with 125.9 acres approved for disposal.
3. The maximum average daily volume of waste disposed at the facility shall not exceed 2,000 tons per day. Should the average daily volume exceed this value by 20% or 100 tons per day, whichever is less, the permittee shall be required to modify the permit in accordance with Rule 335-13-5-.06(2)(a)5. The average daily volume shall be computed as specified by Rule 335-13-5-.06(2)(a)5.(i).

B. Waste Streams. The Permittee may accept for disposal nonhazardous industrial wastes including soil, rock, plastic, rubber, glass, fibrous materials, and residues from the resource recovery plant.

C. Service Area. The Permittee is allowed to receive for disposal waste from the Huron Valley Steel Recycling Facilities in Anniston, Alabama.

D. Waste Placement, Compaction, and Cover. All waste shall be confined to an area as small as possible and placed onto an appropriate slope not to exceed 3 to 1 (See Section VIII.5.). All final slopes shall be 4 to 1. All waste shall be spread in layers two feet or less in thickness and thoroughly compacted with adequate landfill equipment prior to placing additional layers of waste or placing cover. All exposed waste shall be covered once every three months (See Section VIII.2.). A minimum of six inches of compacted earth or other alternative cover material approved by the Department shall be added once every three months. The Permittee is approved to utilize waste materials from the material prep line (MPL) as an alternate cover (See Section VIII.4.).

E. Liner Requirements. The Permittee shall install as described in the Application one of the three liner configurations listed as follows: the Permittee shall install a single clay liner system consisting of 2 feet of compacted clay constructed with a permeability of 1×10^{-7} cm/sec or less and 4 inch thick protective gravel layer, or the Permittee shall install a clay liner system consisting of 1 foot compacted clay constructed with a permeability of 1×10^{-5} cm/sec, a geosynthetic clay liner (Bentomat ST or equivalent) with a permeability of 5×10^{-9} cm/sec or less, and a 6 inch thick protective soil layer, or the Permittee shall install a geosynthetic clay liner – HDPE Composite (Bentomat CL or equivalent) with a permeability of 5×10^{-10} cm/sec or less and a 6 inch thick protective soil layer. The Department grants a variance as requested in the permit application for this site for soil requirements for liner construction required by Rule 335-13-4-.18. The variance will be granted for on site soils that do not have liquid limits of thirty (30) units or greater but do exhibit 1×10^{-7} cm/sec permeability characteristics. Soils used for construction of the liner must have a plasticity index (P.I.) greater than or equal to 15 units due to the moisture sensitivity of soil at low plasticity limits (See Section VIII.3.). The base of the waste or the base of the liner system shall be a minimum of five (5) feet above the temporal fluctuation of the groundwater table.

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

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

SECTION IV. GROUNDWATER MONITORING REQUIREMENTS

- A. The Permittee shall install and/or maintain a groundwater monitoring system, as specified below.
 - 1. The permittee shall maintain the groundwater monitoring wells and piezometers identified in Table IV.1. at the locations specified in the Application, and any other groundwater monitoring wells which are added (Section IV.A.3.) during the active life and the post closure care period.
 - 2. The Permittee shall maintain groundwater monitoring well MW 1R as the background groundwater monitoring well for the entire facility. Monitoring Wells MW-5, MW-6, and MW-7 are also background groundwater monitoring wells and are to be included in the groundwater monitoring system as outlined in Table IV.1.
 - 3. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with the ADEM Admin. Code.

4. Prior to installing any additional groundwater monitoring wells, the Permittee shall submit a report to the Department with a permit modification request specifying the design, location and installation of any additional monitoring wells. This report shall be submitted within ninety (90) days prior to the installation which, at a minimum, shall include.
 - a. Well construction techniques including proposed casing depths, proposed total depth, and proposed screened interval of well(s);
 - b. Well development method(s);
 - c. A complete analysis of well construction materials;
 - d. A schedule of implementation for construction; and
 - e. Provisions for determining the lithologic characteristics, hydraulic conductivity and grain-size distribution for the applicable aquifer unit(s) at the location of the new well(s).

B. Groundwater Monitoring Requirements.

1. The Permittee shall determine the groundwater surface elevation at each monitoring well and piezometer identified in Table IV.1. each time the well or piezometer is sampled and at least annually throughout the active life and post-closure care period.
2. The Permittee shall determine the groundwater flow rate and direction in the first zone of saturation at least semi- annually or each time groundwater is sampled and submit as required by ADEM Admin. Code Division 13.
3. Prior to the initial receipt of waste at the facility, the Permittee shall sample, and analyze for the parameters listed in Appendix I of Rule 335-13-4-.27, and/or any other parameters specified by the Department in Table IV. 2., all monitoring wells identified in Section IV.A.2. to establish background water quality and/or as directed by Rule 335-13-4-.27(2)(j) and 335-13-4-.27(2)(a)(1).
4. The Permittee shall sample, and analyze all monitoring wells identified in Table IV.1 for the parameters listed in Appendix I of Rule 335-13-4-.27(3), and/or any other parameters specified by the Department in Table IV.2, on a semi- annual basis throughout the active life of the facility and the post-closure care period in accordance with Rule 335-13-4-.27(3). Sampling shall be conducted during March and September of each year, beginning with the effective date of this permit. The records and results of this sampling and analysis activity shall be submitted to the Department, within ninety (90) days of the date of sampling.
5. In addition to the requirements of Section IV., B.,1., B.,2., B.,3. and B.,4., the Permittee shall record water levels, mean sea level elevation measuring point, depth to water, and the results of field tests for pH and specific conductance at the time of sampling for each well.

C. Sampling and Analysis Procedures.

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Section IV.,A. to provide a reliable indication of the quality of the groundwater.

1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in the Application. Monitoring wells shall be bailed or pumped to remove at least four times the well volume of water. Slow recharge wells shall be bailed until dry. Wells shall be allowed to recharge prior to sampling.

2. Samples shall be analyzed according to the procedures specified of the Application, Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), or other appropriate methods approved by this Department. All field tests must be conducted using approved EPA test kits and procedures.
 3. The Permittee is approved for inter-well statistical analysis.
 4. Samples shall be tracked and controlled using the chain-of-custody and QA/QC procedures specified in the Application.
- D. Recordkeeping and Reporting Requirements.
1. Recording of Results. For each sample and/or measurement taken pursuant to the requirements of this permit, the Permittee shall record the information required by Section I.,E.,9.,c.
 2. Recordkeeping. Records and results of all groundwater monitoring, sampling, and analysis activities conducted pursuant to the requirements of this permit shall be included in the operating record required by Section I.,I.,1.
- E. Permit Modification. If at any time the Permittee or the Department determines that the groundwater monitoring system no longer satisfies the requirements of 335-13-4-.14 or Section IV.,A. of this permit, the Permittee must, within 90 days, submit an application for a permit modification to make any necessary and/or appropriate changes to the system.

TABLE IV.1.
GROUNDWATER MONITORING WELLS

Monitoring Well Number	Top of Casing (feet msl)	Part Monitored
UPGRADIENT/BACKGROUND MONITORING WELLS		
MW 1R	838.25	Entire Landfill
MW-5*	827.22	Entire Landfill
MW-6*	851.02	Entire Landfill
MW-7*	815.28	Entire Landfill
DOWNGRADIENT MONITORING WELLS		
MW 2	810.93	Entire Landfill
MW 3	827.71	Entire Landfill
MW-4*	852.81	Entire Landfill
MW-8*	881.75	Entire Landfill
MW-9*	TO BE INSTALLED	Entire Landfill
MW-10*	TO BE INSTALLED	Entire Landfill
MW-11*	TO BE INSTALLED	Entire Landfill

- * Monitoring Wells MW-4 and MW-5 are to be added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 13 through 18. Monitoring Wells MW-6, MW-7, MW-9, and MW-10 are to be added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 1 through 4. Monitoring Well MW-8 is to be added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 1 through 9. Monitoring Well MW-11 is to be

added to the groundwater monitoring system prior to waste being disposed in Proposed Cells 5 through 12. Proposed Cells 1 through 18 were included in the expansion dated February 25, 2013.

**TABLE IV.2.
BACKGROUND AND SEMI-ANNUAL GROUNDWATER MONITORING PARAMETERS**

The facility is permitted to analyze for the following parameters:

Indicator Parameters

pH
Specific Conductance

Inorganic Parameters

Chromium
Copper
Lead
Mercury
Nickel
Silver
Zinc

Organic Parameters

Total Organic Carbon(TOC)

NOTE: Should the specific conductance or TOC concentrations increase the Department may require the facility to broaden the list of parameters to detect the constituent(s) of concern.

SECTION V. GAS MONITORING REQUIREMENTS

The Department grants a variance for gas monitoring at Huron Valley Industrial Landfill in accordance with Chapter 8, Division 13, ADEM Admin. Codes (See Section VIII.1.). If at any time the Department determines that an explosive gas monitoring system is deemed necessary for the protection of human health and the environment, the Permittee must, within 90 days, submit an application for permit modification for the installation of an explosive gas monitoring system that meets the proper regulatory requirements of the Alabama Department of Environmental Management.

SECTION VI. LEACHATE AND SURFACE WATER MANAGEMENT REQUIREMENTS

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

Huron Valley Steel Corporation is permitted to pump the collected leachate into a truck, return to its plant, and utilize it as process water.

SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

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

- A. **Final Cover.** The Permittee shall grade final soil cover such that surface water does not pond over the permitted area as specified in the Application. The final cover system shall comply with ADEM Admin. Code Division 13. The Permittee has been granted a variance from Rule 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1.
- B. **Vegetative Cover.** The Permittee shall establish a vegetative or other appropriate cover within 90 days after completion of final grading requirements in the Application. Preparation of a vegetative cover shall include, but not be limited to, the placement of seed, fertilizer, mulch, and water.
- C. **Notice of Intent.** The Permittee shall place in the operating record and notify the Department of their intent to close the landfill prior to beginning closure.
- D. **Completion of Closure Activities.** The Permittee must complete closure activities of each landfill unit in accordance with the Closure Plan within 180 days of the last known receipt of waste.
- E. **Certification of Closure.** Following closure of each unit, the Permittee must submit to the Department a certification, signed by an engineer, verifying the closure has been completed according to the Closure Plan.
- F. **Post-Closure Care Period.** Post-closure care activities shall be conducted after closure of each unit throughout the life of this permit and continuing for a period of thirty (30) years following closure of the facility. The Department may shorten or extend the post-closure care period applicable to the solid waste disposal facility. The Permittee shall reapply in order to fulfill the post-closure care requirements of this permit.
- G. **Post-Closure Maintenance.** The Permittee shall provide post closure maintenance of the facility to include regularly scheduled inspections. This shall include maintenance of the cover, vegetation, monitoring devices and pollution control equipment and correction of other deficiencies that may be observed by ADEM. Monitoring requirements shall continue throughout the post closure period as determined by the Department unless all waste is removed and no unpermitted discharge to waters of the State have occurred.
- H. **Post-Closure Use of Property.** The Permittee shall ensure that post closure use of the property never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area.
- I. **Certification of Post-Closure.** Following post-closure of each unit, the Permittee must submit to the Department a certification, signed by an engineer, verifying the post-closure has been completed according to the Post-Closure Plan.
- J. **Notice in Deed to Property.** The Permittee shall record a notation onto the land deed containing the property utilized for disposal within 90 days after permit expiration, revocation or when closure requirements are achieved as determined by the Department as stated in the Application. This notation shall state that the land has been used as a solid waste disposal facility, the name of the Permittee, type of disposal activity, location of the disposal facility and beginning and closure dates of the disposal activity.
- K. **Recording Instrument.** The Permittee shall submit a certified copy of the recording instrument to the Department within 120 days after permit expiration, revocation, or as directed by the Department as described in the Application.
- L. **Removal of Waste.** If the Permittee, or any other person(s), wishes to remove waste, waste residues, or any liner or contaminated soils, the owner must request and receive prior approval from the Department (See Section VIII.6.).

SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

1. The Department grants a variance from Rule 335-13-4-.16 of the permit for explosive gas monitoring. (See Section V.)
2. The Department grants a variance from Rule 335-13-4-.23 (1)(a) concerning weekly soil cover. The permittee shall be required to cover the working face once in three months. (See Section III.D.)
3. The Department grants a variance as requested in the permit application for this site for soil requirements for liner construction required by Rule 335-13-4-.18. The variance will be granted for on site soils that do not have liquid limits of thirty (30) units or greater but do exhibit 1×10^{-7} cm/sec permeability characteristics. Soils used for construction of the liner must have a plasticity index (P.I.) greater than or equal to 15 units due to the moisture sensitivity of soil at low plasticity limits. (See Section III.E.)
4. The Department grants approval to Huron Valley Steel Corporation to utilize waste material from the material prep line (MPL) as an alternate cover. (See Section III.D.)
5. The Department grants a variance from Rule 335-13-4-.23(c) requiring 4 to 1 working face slopes. The Permittee is approved for 3 to 1 working face slopes. All final slopes shall be 4 to 1. (See Section III.D.)
6. Huron Valley Steel Corporation has been approved to remove waste material from the landfill for recycling. (See Section VII.L.)
7. The Department grants a variance from Rule 335-13-4-.20(2)(c)2. requiring that the maximum final grade of the cover system not exceed 25 percent (4:1). Final slopes shall not exceed 3:1 (See Section VII.A.)

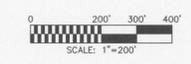
Any variance granted by the Department may be terminated by the Department whenever the Department finds, after notice and opportunity for hearing, that the petitioner is in violation of any requirement, condition, schedule, limitation or any other provision of the variance, or that operation under the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

SECTION IX. ADDITIONAL SAMPLING REQUIREMENTS

PERIODIC WASTE STREAM SAMPLING.

The Land Division of ADEM has determined the industrial waste generated by Huron Valley Steel Corporation's recycling operations and included in the waste stream for this site is non-hazardous. However, certain constituents of the waste stream are present in high concentrations. Therefore, additional sampling will be required for the waste stream to be landfilled.

The testing program for material to be placed in the landfill will include at a minimum semi-annual TCLP analysis for the 8 RCRA metals, and biannual completion of an ADEM Solid Waste Profile of the subject material. Protocol for sampling must follow that outlined in the Environmental Protection Agency (EPA) Publication Number 560/5-90-008, or amendments thereof, and as described in the permit application. TCLP analysis must be performed on the samples to ensure the waste stream retains its classification as non-hazardous. Results from the analysis and certification that the waste is non-hazardous must be submitted to the Department's Land Division within thirty (30) days from the date of sampling.



GENERAL NOTES

1. LANDFILL OWNER:
 HURON VALLEY STEEL CORPORATION
 820 WARE STREET
 ANNISTON, ALABAMA 36201
 CONTACT: TOM EDWARDS, VP
 PHONE: (256) 238-9127
2. ENGINEER:
 LPC TECHNOLOGIES
 P.O. BOX 381032
 BIRMINGHAM, ALABAMA 35238
 CONTACT: PATRICK L. CHUMBLEY, PE (AL REG. 19181)
 PHONE: (205) 259-6012
3. BARRY SURVEYING
 80 LOCKETTE DRIVE
 JACKSONVILLE, ALABAMA 35265
 CONTACT: TIMOTHY D. BARRY, R.L.S.
 PHONE: (256) 435-6612
4. AERIAL TOPOGRAPHIC SURVEY INFORMATION PROVIDED BY:
 AEROTECH, LLC
 560 MITCHELL FIELD ROAD
 BESSEMER, ALABAMA 35022
 CONTACT: BILL DOW
 PHONE: (205) 428-6444

SITE NOTES

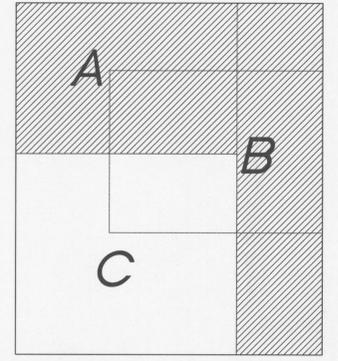
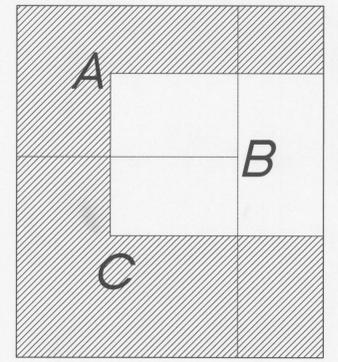
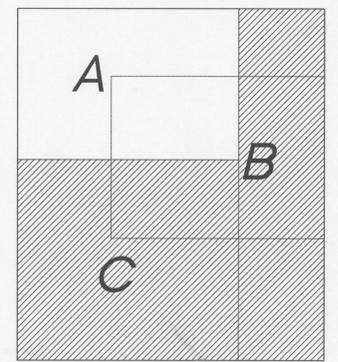
1. ACTUAL CONDITIONS AND CONFIGURATIONS OF STRUCTURES AND ENTRANCE ROAD MAY VARY BASED ON SITE CONDITIONS.
2. BUFFER ZONES AROUND THE PERIMETER OF THE LANDFILL UNIT SHALL BE A MINIMUM OF 100 FEET IN WIDTH MEASURED IN A HORIZONTAL PLANE. NO DISPOSAL OR STORAGE PRACTICES FOR WASTE SHALL TAKE PLACE IN THE BUFFER ZONE. ROADS, ACCESS CONTROL MEASURES, EARTH STORAGE, AND BUILDINGS MAY BE PLACED IN THE BUFFER ZONE.

SITE LEGEND

- PROPERTY LINE
- LIMITS OF WASTE
- ALL-WEATHER ACCESS ROAD
- EXISTING WATER TABLE

SHEET INDEX

- C1 OVERALL SITE PLAN
- C2 OVERALL BASE GRADING PLAN
- C3 BASE GRADING PLAN A
- C4 BASE GRADING PLAN B
- C5 BASE GRADING PLAN C
- C6 OVERALL CLOSURE GRADING PLAN
- C7 CLOSURE GRADING PLAN A
- C8 CLOSURE GRADING PLAN B
- C9 CLOSURE GRADING PLAN C
- C10 SECTION VIEW
- C11 DETAILS
- BOUNDARY SURVEY (BY OTHERS)



HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
 CALHOUN COUNTY, ALABAMA
 ADEM PERMIT NO. 08-18

HURON VALLEY STEEL CORPORATION
 820 WARE STREET
 ANNISTON, ALABAMA 36201



LPC TECHNOLOGIES
 P.O. BOX 381032
 BIRMINGHAM, ALABAMA 35238
 PHONE: (205) 253-0268
 FAX: (205) 503-4663



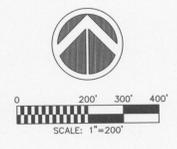
JOB NO:
 DWG NAME:

OVERALL SITE PLAN

SHEET:
C1

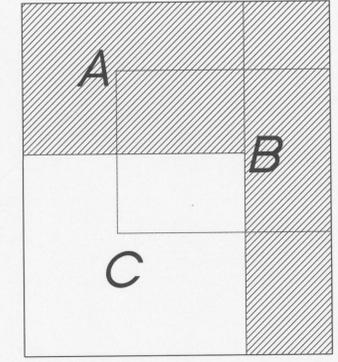
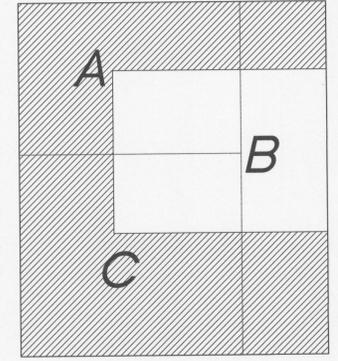
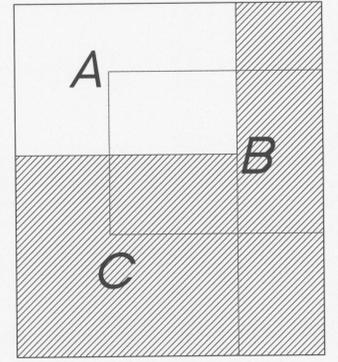
DATE: 05/10/19

ISSUED FOR PERMIT



- BASE GRADE NOTES**
1. ACTUAL LOCATIONS AND CONFIGURATIONS OF STRUCTURES AND ENTRANCE ROAD MAY VARY BASED ON SITE CONDITIONS.
 2. LANDFILL CONSTRUCTION WILL BE ON AN ON-GOING BASIS. FILLING OPERATIONS WILL BEGIN UPON COMPLETION OF FIRST CELL. EACH ADDITIONAL CELL WILL BE CONSTRUCTED ON AN AS-NEEDED BASIS.
 3. THE BOTTOM ELEVATION OF THE LINER SHALL BE A MINIMUM OF FIVE FEET ABOVE THE HIGHEST MEASURED GROUNDWATER LEVEL.

- BASE GRADE LEGEND**
- FINISHED GRADE 20' CONTOUR
 - FINISHED GRADE 5' CONTOUR
 - EXISTING GRADE 20' CONTOUR
 - EXISTING GRADE 5' CONTOUR
 - EXISTING WATER TABLE
 - PROPERTY LINE



HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
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 ADEM PERMIT NO. 08-18

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LPC TECHNOLOGIES
 P.O. BOX 381032
 BIRMINGHAM, ALABAMA 35238
 PHONE: (205) 253-0268
 FAX: (205) 503-4663



JOB NO:
 DWG NAME:

BASE GRADE PLAN

SHEET:
C2

DATE: 05/10/19

REVISIONS

ISSUED FOR PERMIT - 12/02/11
REVISED FOR ADEM - 05/25/12
REVISED FOR ADEM - 10/08/12
ISSUED FOR PERMIT - 05/10/19

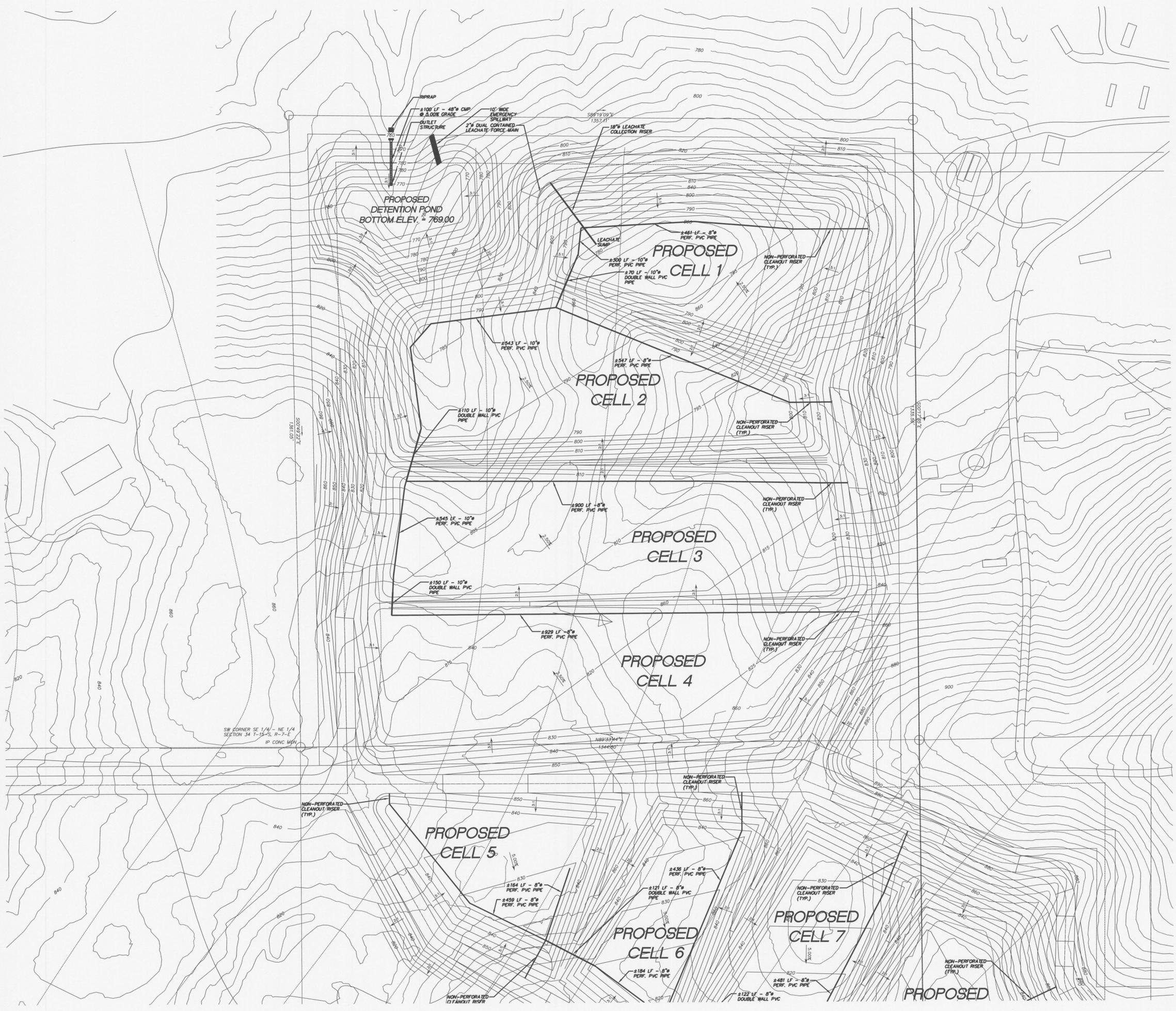
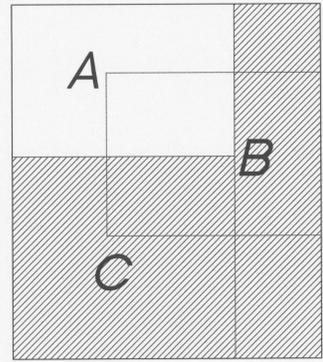


BASE GRADE NOTES

1. ACTUAL LOCATIONS AND CONFIGURATIONS OF STRUCTURES AND ENTRANCE ROAD MAY VARY BASED ON SITE CONDITIONS.
2. LANDFILL CONSTRUCTION WILL BE ON AN ON-GOING BASIS. FILLING OPERATIONS WILL BEGIN UPON COMPLETION OF FIRST CELL. EACH ADDITIONAL CELL WILL BE CONSTRUCTED ON AN AS-NEEDED BASIS.
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4. THE SOIL LINER MUST BE COMPACTED IN LIFTS OF 4 TO 6 INCHES WITHIN 4 PERCENT OF OPTIMUM MOISTURE CONTENT (OR AS APPROVED BY THE ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT) TO A FIELD DENSITY WHICH CORRELATES WITH A LABORATORY PERMEABILITY OF 1×10^{-11} CM/SEC OR LESS.

BASE GRADE LEGEND

- FINISHED GRADE 20' CONTOUR
- FINISHED GRADE 5' CONTOUR
- EXISTING GRADE 20' CONTOUR
- EXISTING GRADE 5' CONTOUR
- EXISTING WATER TABLE
- PROPERTY LINE



HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
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LPC TECHNOLOGIES
P.O. BOX 381032
BIRMINGHAM, ALABAMA 35238
PHONE: (205) 233-0266
FAX: (205) 503-4663



JOB NO:
DWG NAME:
BASE GRADE PLAN

SHEET:
C3

DATE: 05/10/19

ISSUED FOR PERMIT

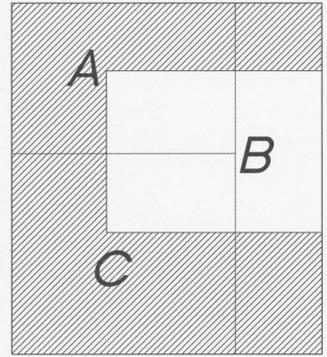


BASE GRADE NOTES

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BASE GRADE LEGEND

- FINISHED GRADE 20' CONTOUR
- FINISHED GRADE 5' CONTOUR
- EXISTING GRADE 20' CONTOUR
- EXISTING GRADE 5' CONTOUR
- EXISTING WATER TABLE
- PROPERTY LINE



SW CORNER SE 1/4 - NE 1/4
 SECTION 34 T-16-S R-7-E
 IP CONC MGN

HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
 CALHOUN COUNTY, ALABAMA
 ADEM PERMIT NO. 08-18

HURON VALLEY STEEL CORPORATION
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 ANNISTON, ALABAMA 36201



LPC TECHNOLOGIES
 P.O. BOX 381032
 BIRMINGHAM, ALABAMA 35238
 PHONE: (205) 253-0268
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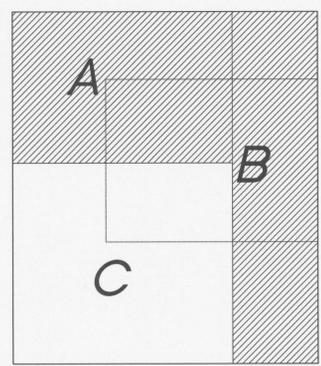
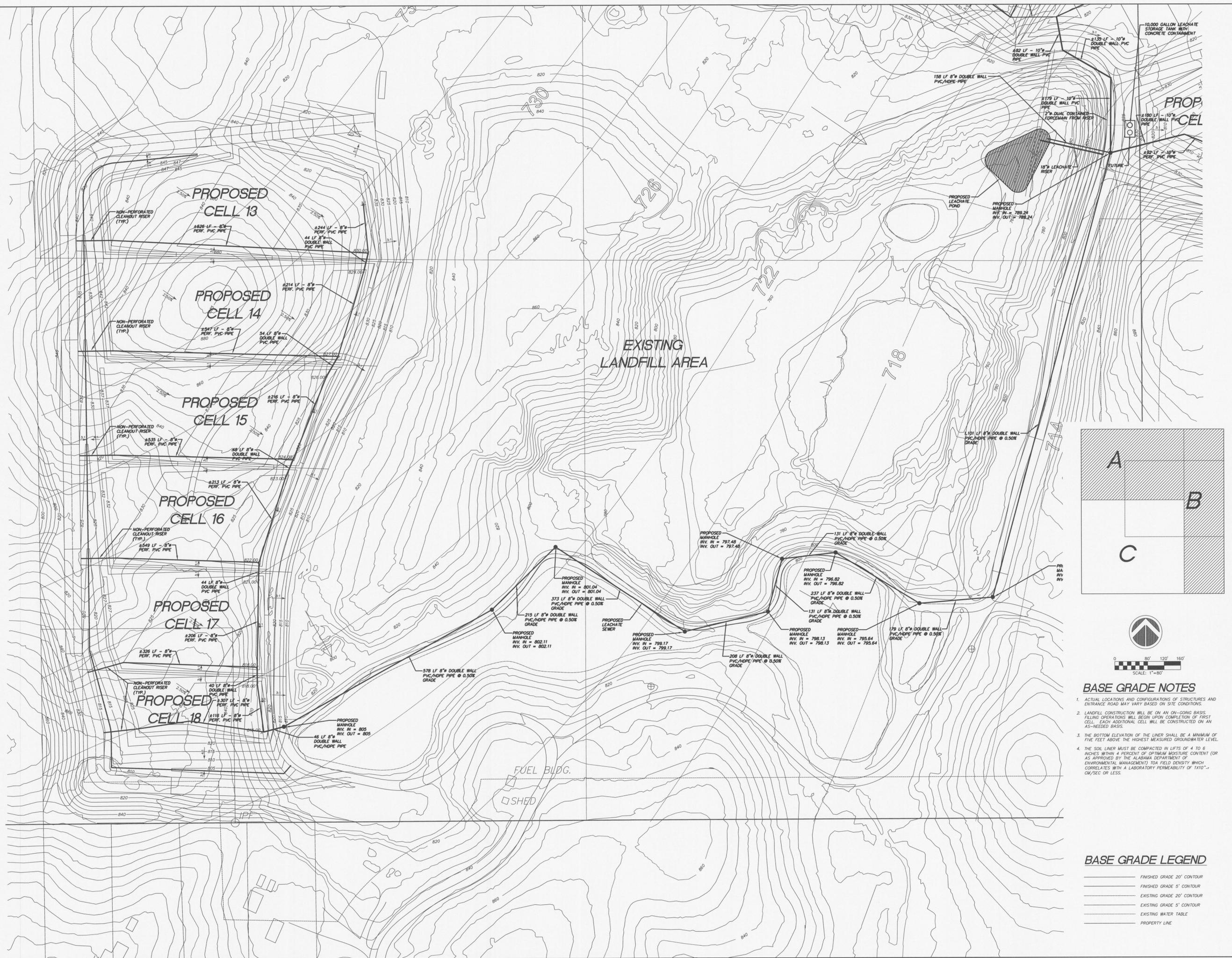


JOB NO:
 DWG NAME:
BASE GRADE PLAN

SHEET:
C4

DATE: 05/10/19

ISSUED FOR PERMIT



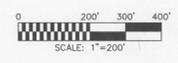
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 SCALE: 1"=80'

BASE GRADE NOTES

1. ACTUAL LOCATIONS AND CONFIGURATIONS OF STRUCTURES AND ENTRANCE ROAD MAY VARY BASED ON SITE CONDITIONS.
2. LANDFILL CONSTRUCTION WILL BE ON AN ON-GOING BASIS. FILLING OPERATIONS WILL BEGIN UPON COMPLETION OF FIRST CELL. EACH ADDITIONAL CELL WILL BE CONSTRUCTED ON AN AS-NEEDED BASIS.
3. THE BOTTOM ELEVATION OF THE LINER SHALL BE A MINIMUM OF FIVE FEET ABOVE THE HIGHEST MEASURED GROUNDWATER LEVEL.
4. THE SOIL LINER MUST BE COMPACTED IN LIFTS OF 4 TO 6 INCHES WITHIN 4 PERCENT OF OPTIMUM MOISTURE CONTENT (OR AS APPROVED BY THE ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT) TO A FIELD DENSITY WHICH CORRELATES WITH A LABORATORY PERMEABILITY OF 1X10⁻¹⁰ CM/SEC OR LESS.

BASE GRADE LEGEND

- FINISHED GRADE 20' CONTOUR
- FINISHED GRADE 5' CONTOUR
- EXISTING GRADE 20' CONTOUR
- EXISTING GRADE 5' CONTOUR
- EXISTING WATER TABLE
- PROPERTY LINE

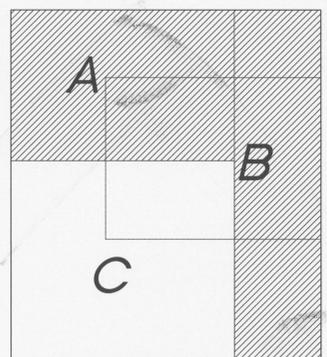
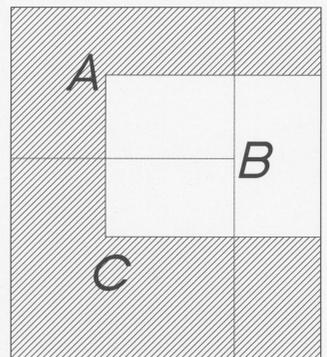
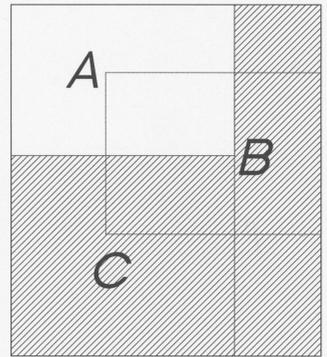


CLOSURE PLAN NOTES

1. ACTUAL FINAL CONTOURS WILL BE CONSISTENT WITH MAXIMUM EFFECTIVE SIDE SLOPES OF 3:1 AND MINIMUM SIX TOP SLOPES BUT MAY BE SLIGHTLY DIFFERENT FROM CONTOURS SHOWN TO ACCOUNT FOR DRAINAGE, LONG-TERM SETTLEMENT AND CONSTRUCTION EQUIPMENT ACCESS.
2. CONTOURS SHOWN REPRESENT TOP OF FINAL COVER LAYER.
3. THE COVER SYSTEM INFILTRATION LAYER MUST BE COMPRISED OF A MINIMUM OF 18 INCHES OF EARTHEN MATERIAL AND/OR A SYNTHETIC LAYER THAT HAS A PERMEABILITY LESS THAN OR EQUAL TO THE PERMEABILITY OF ANY BOTTOM LINER SYSTEM OR NATURAL SUBSOILS PRESENT, OR A PERMEABILITY NO GREATER THAN 1×10^{-9} CM/SEC. WHICHEVER IS LESS.
4. THE COVER SYSTEM EROSION LAYER MUST CONSIST OF A MINIMUM SIX INCHES OF EARTHEN MATERIAL THAT IS CAPABLE OF SUSTAINING NATIVE PLANT GROWTH, AS SPECIFIED BY THE ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT.
5. STORM DRAINAGE PIPE MATERIALS SHALL BE CONCRETE, HDPE OR CMP.

CLOSURE PLAN LEGEND

- PROPERTY LINE
- FINISHED GRADE CONTOUR
- EXISTING GRADE CONTOUR
- EXISTING WATER TABLE



REVISIONS
 ISSUED FOR PERMIT - 12/02/11
 REVISED FOR ADEM - 05/25/12
 ISSUED FOR PERMIT - 07/01/19

HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
 CALHOUN COUNTY, ALABAMA
 ADEM PERMIT NO. 08-18

HURON VALLEY STEEL CORPORATION
 820 WARE STREET
 ANNISTON, ALABAMA 36201



LPC TECHNOLOGIES
 P.O. BOX 381032
 BIRMINGHAM, ALABAMA 35238
 PHONE: (205) 253-0268
 FAX: (205) 503-4663

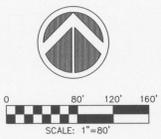


JOB NO:
 DWG NAME:
CLOSURE GRADE PLAN

SHEET:
C6

DATE: 07/01/2019

ISSUED FOR PERMIT

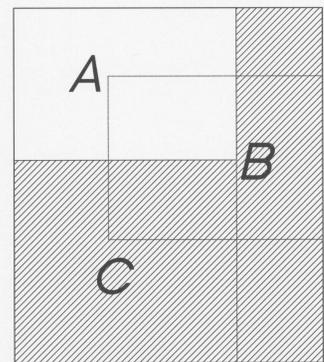


CLOSURE PLAN NOTES

1. ACTUAL FINAL CONTOURS WILL BE CONSISTENT WITH MAXIMUM EFFECTIVE SIDE SLOPES OF 3:1 AND MINIMUM 5% TOP SLOPES BUT MAY BE SLIGHTLY DIFFERENT FROM CONTOURS SHOWN TO ACCOUNT FOR DRAINAGE, LONG-TERM SETTLEMENT AND CONSTRUCTION EQUIPMENT ACCESS.
2. CONTOURS SHOWN REPRESENT TOP OF FINAL COVER LAYER.
3. EXACT LOCATIONS OF GROUNDWATER MONITORING WELLS WILL BE DETERMINED DURING INSTALLATION TO ENSURE PROPER LOCATION AND DEPTH.
4. THE COVER SYSTEM INFILTRATION LAYER MUST BE COMPRISED OF A MINIMUM OF 18 INCHES OF EARTHEN MATERIAL AND/OR A SYNTHETIC LAYER THAT HAS A PERMEABILITY LESS THAN OR EQUAL TO THE PERMEABILITY OF ANY BOTTOM LINER SYSTEM OR NATURAL SUBSOILS PRESENT, OR A PERMEABILITY NO GREATER THAN 1×10^{-5} CM/SEC, WHICHEVER IS LESS.
5. THE COVER SYSTEM EROSION LAYER MUST CONSIST OF A MINIMUM SIX INCHES OF EARTHEN MATERIAL THAT IS CAPABLE OF SUSTAINING NATIVE PLANT GROWTH, AS SPECIFIED BY THE ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT.
6. STORM DRAINAGE PIPE MATERIALS SHALL BE CONCRETE, HOPE OR CMP.

CLOSURE PLAN LEGEND

- PROPERTY LINE
- FINISHED GRADE CONTOUR
- EXISTING GRADE CONTOUR
- EXISTING WATER TABLE



REVISIONS

ISSUED FOR PERMIT - 12/02/11
REVISED FOR ADEM - 05/26/12
ISSUED FOR PERMIT - 07/01/19

HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
 CALHOUN COUNTY, ALABAMA
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 BIRMINGHAM, ALABAMA 35238
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 FAX: (205) 503-4663



JOB NO:
 DWG NAME:
CLOSURE GRADE PLAN

SHEET:
C7

DATE: 07/01/2019

ISSUED FOR PERMIT

REVISIONS

ISSUED FOR PERMIT - 12/02/11
REVISED FOR ADEM - 05/25/12
REVISED FOR ADEM - 10/08/12
ISSUED FOR PERMIT - 07/01/19



CLOSURE PLAN NOTES

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5. THE COVER SYSTEM EROSION LAYER MUST CONSIST OF A MINIMUM SIX INCHES OF EARTHEN MATERIAL THAT IS CAPABLE OF SUSTAINING NATIVE PLANT GROWTH, AS SPECIFIED BY THE ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT.
6. STORM DRAINAGE PIPE MATERIALS SHALL BE CONCRETE, HDPE OR CMP.

CLOSURE PLAN LEGEND

- PROPERTY LINE
- FINISHED GRADE CONTOUR
- EXISTING GRADE CONTOUR
- EXISTING WATER TABLE



HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
CALHOUN COUNTY, ALABAMA
ADEM PERMIT NO. 08-18

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P. O. BOX 381032
BIRMINGHAM, ALABAMA 35238
PHONE: (205) 253-0268
FAX: (205) 503-4663



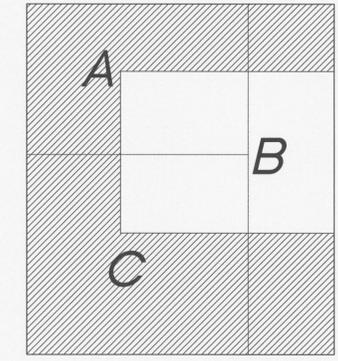
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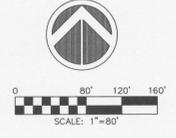
CLOSURE
GRADE PLAN

SHEET:
C8

DATE: 07/01/2019

ISSUED FOR PERMIT



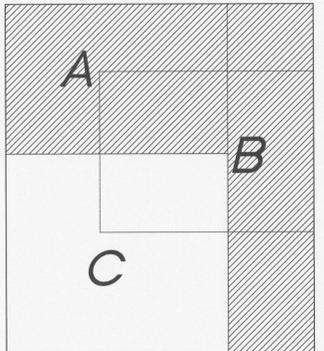


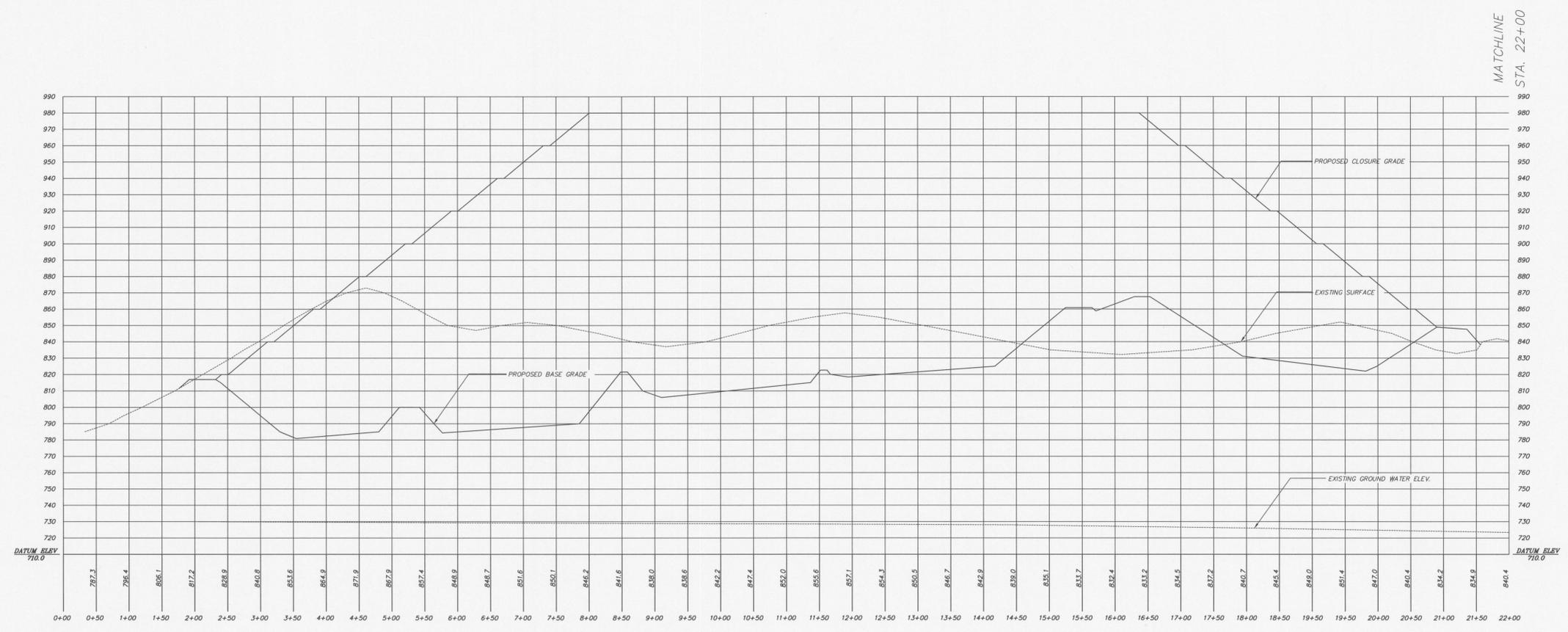
CLOSURE PLAN NOTES

1. ACTUAL FINAL CONTOURS WILL BE CONSISTENT WITH MAXIMUM EFFECTIVE SIDE SLOPES OF 3:1 AND MINIMUM SIX TOP SLOPES BUT MAY BE SLIGHTLY DIFFERENT FROM CONTOURS SHOWN TO ACCOUNT FOR DRAINAGE, LONG-TERM SETTLEMENT AND CONSTRUCTION EQUIPMENT ACCESS.
2. CONTOURS SHOWN REPRESENT TOP OF FINAL COVER LAYER.
3. EXACT LOCATIONS OF GROUNDWATER MONITORING WELLS WILL BE DETERMINED DURING INSTALLATION TO ENSURE PROPER LOCATION AND DEPTH.
4. THE COVER SYSTEM INFILTRATION LAYER MUST BE COMPRISED OF A MINIMUM OF 18 INCHES OF EARTHEN MATERIAL AND/OR A SYNTHETIC LAYER THAT HAS A PERMEABILITY LESS THAN OR EQUAL TO THE PERMEABILITY OF ANY BOTTOM LAYER SYSTEM OR NATURAL SUBSOILS PRESENT, OR A PERMEABILITY NO GREATER THAN 1×10^{-5} CM/SEC, WHICHEVER IS LESS.
5. THE COVER SYSTEM EROSION LAYER MUST CONSIST OF A MINIMUM SIX INCHES OF EARTHEN MATERIAL THAT IS CAPABLE OF SUSTAINING NATIVE PLANT GROWTH, AS SPECIFIED BY THE ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT.
6. STORM DRAINAGE PIPE MATERIALS SHALL BE CONCRETE, HDPE OR CMP.

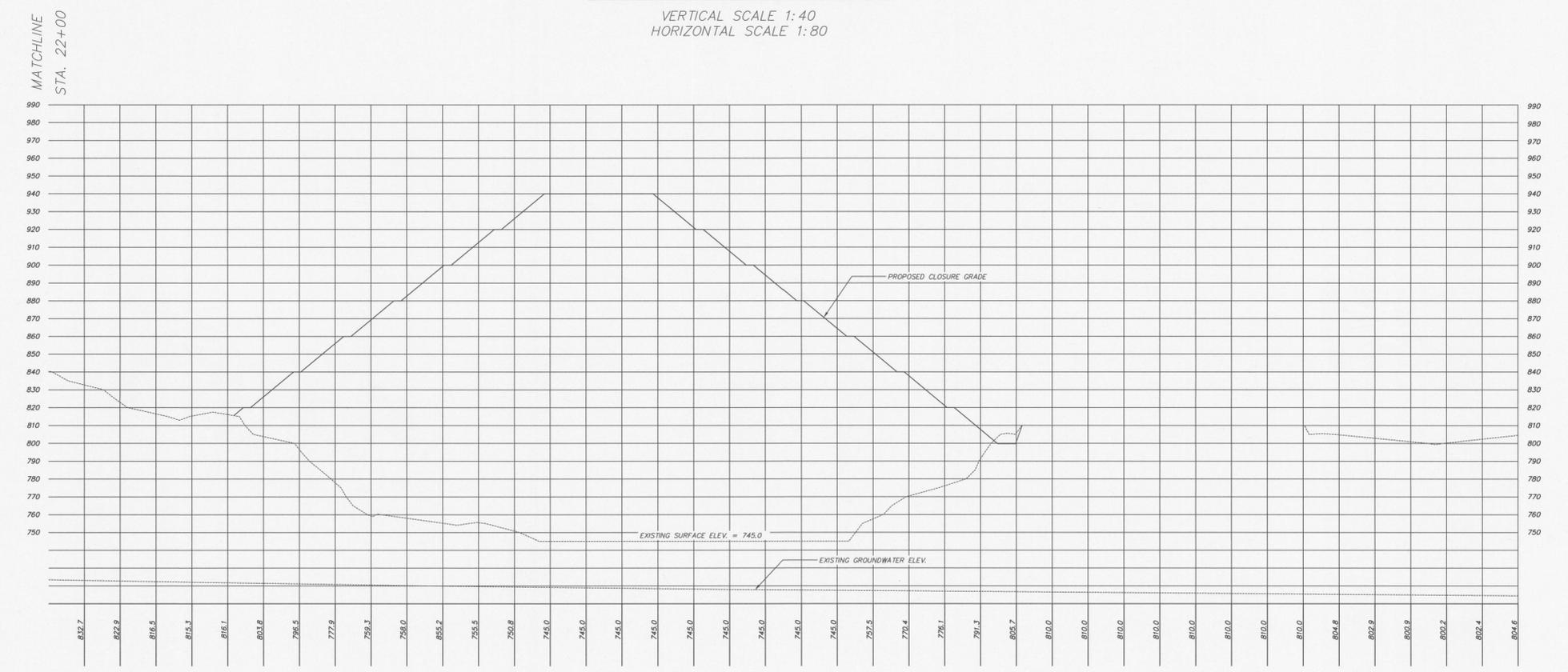
CLOSURE PLAN LEGEND

- PROPERTY LINE
- FINISHED GRADE CONTOUR
- EXISTING GRADE CONTOUR
- EXISTING WATER TABLE





CROSS SECTION A-A'
 VERTICAL SCALE 1:40
 HORIZONTAL SCALE 1:80



HURON VALLEY INDUSTRIAL LANDFILL MODIFICATION
 CALHOUN COUNTY, ALABAMA
 ADEM PERMIT NO. 08-18

HURON VALLEY STEEL CORPORATION
 820 WARE STREET
 ANNISTON, ALABAMA 36201



LPC TECHNOLOGIES
 P.O. BOX 381032
 BIRMINGHAM, ALABAMA 35238
 PHONE: (205) 253-0268
 FAX: (205) 503-4663

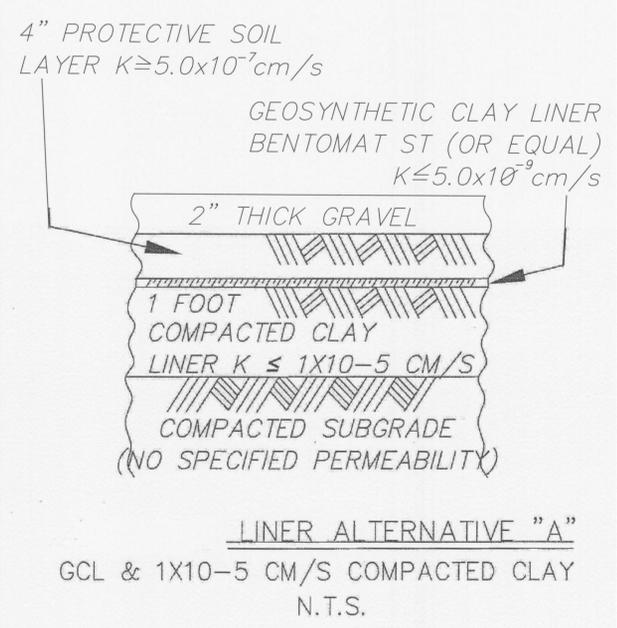
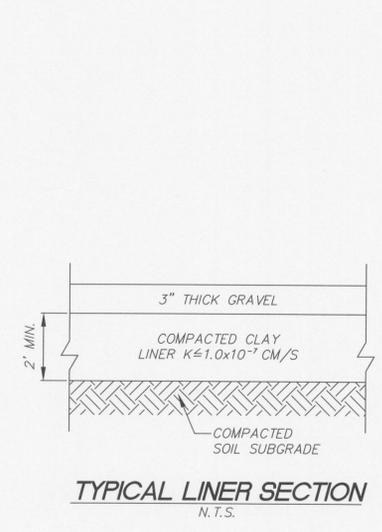
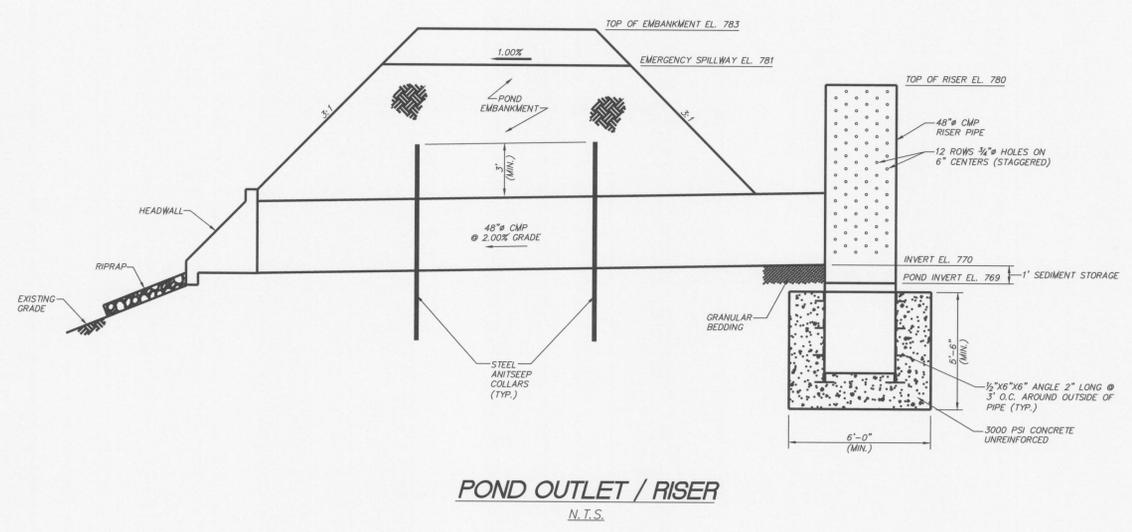
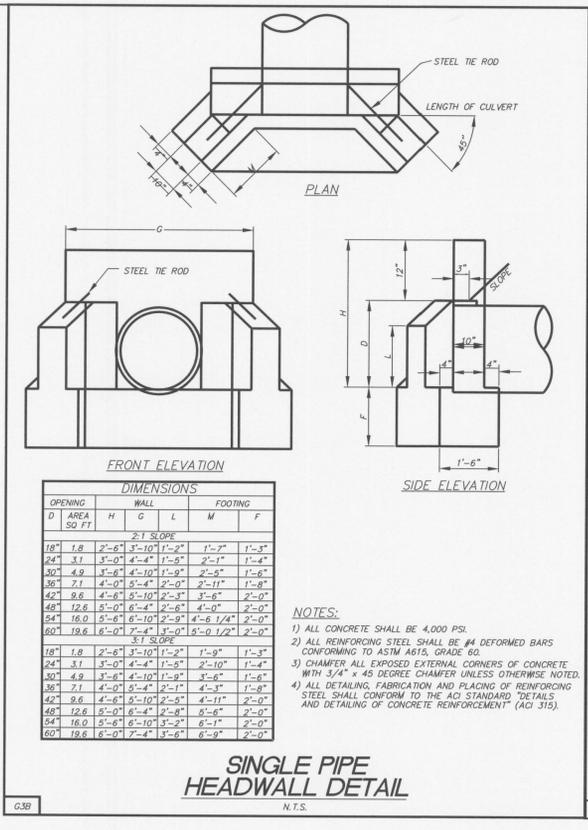


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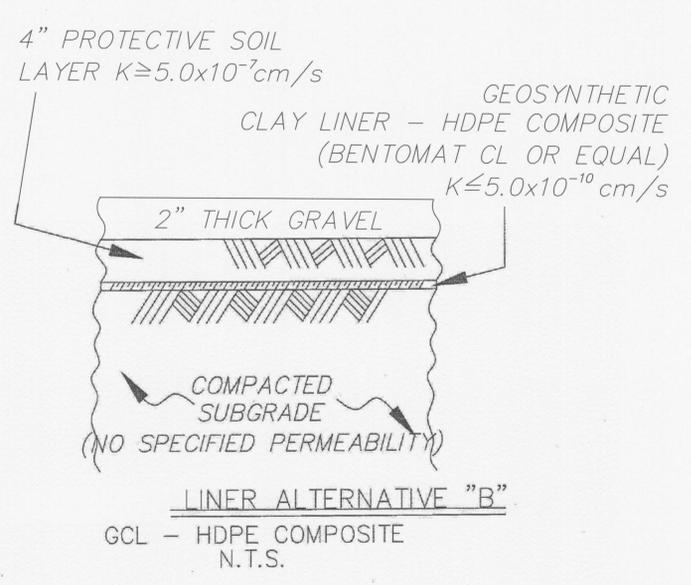
SECTION VIEW

SHEET:
C10

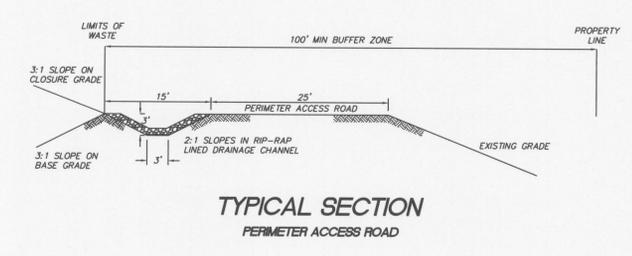
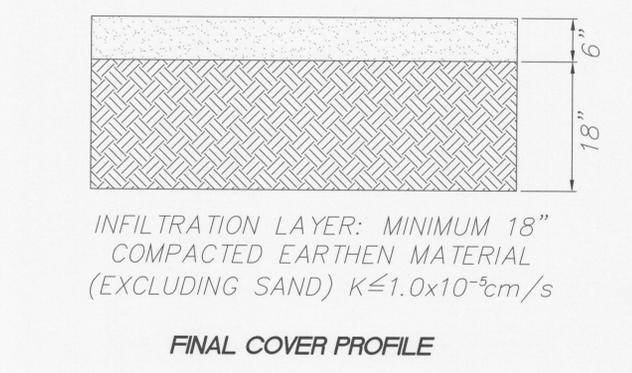
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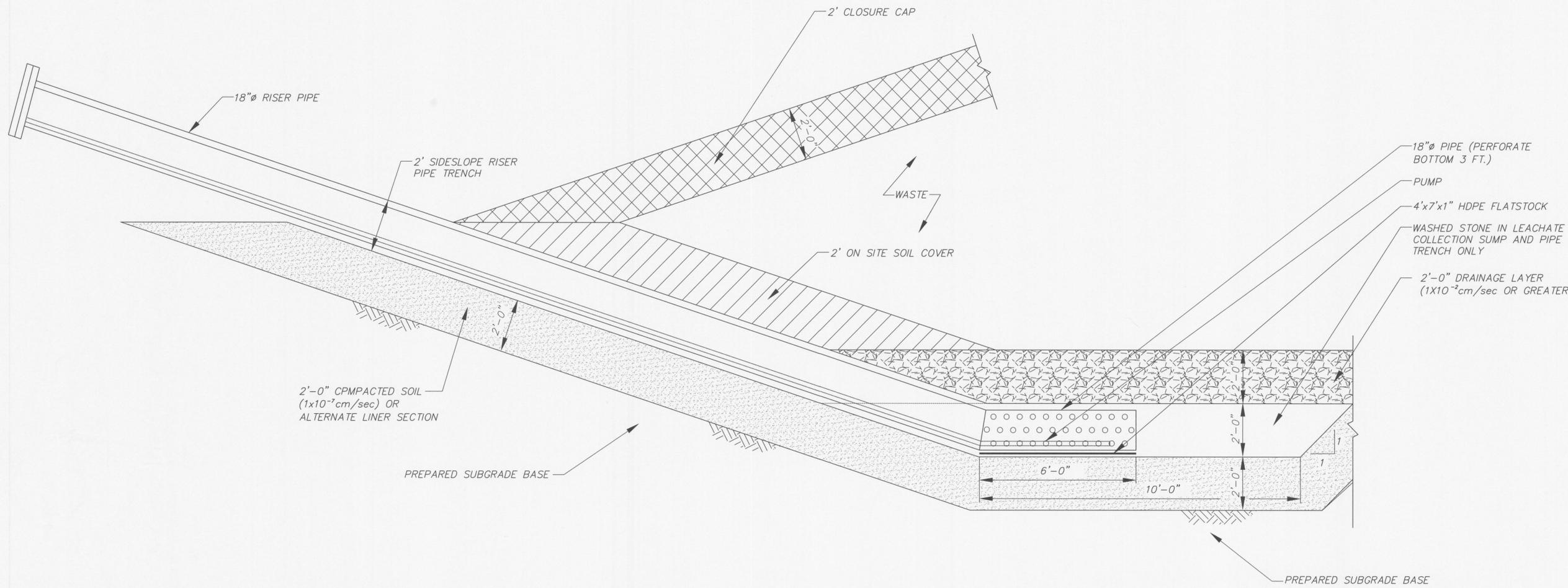
NOTE: PROTECTIVE SOIL LAYER TO BE "END-DUMPED" AND SPREAD WITH TRACKED EARTH MOVING EQUIPMENT TO A MINIMUM THICKNESS AS NOTED



NOTE: PROTECTIVE SOIL LAYER TO BE "END-DUMPED" AND SPREAD WITH TRACKED EARTH MOVING EQUIPMENT TO A MINIMUM THICKNESS AS NOTED



REVISIONS
ISSUED FOR PERMIT - 12/02/11
REVISED FOR ADEM - 05/25/12
ISSUED FOR PERMIT - 05/10/19
ISSUED FOR PERMIT - 05/10/19



TYPICAL LEACHATE COLLECTION RISER PIPE AND SUMP'
N.T.S.

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JOB NO:
DWG NAME:
SECTION VIEW/DETAILS
SHEET:
C12
DATE: 05/10/19

ISSUED FOR PERMIT