

BROWNE
AND COMPANY, LLC
2719 Sheraton Drive • Bldg C, Suite 210
Macon, Georgia 31204
Phone/Fax: 478-743-4843 Browne1234@aol.com

May 15, 2018

Ms. Rima Naji
Environmental Engineer
Georgia EPD - Solid Waste
Atlanta Tradeport, Suite 104
4244 International Parkway
Atlanta, GA 30354

**Re: WI - Taylor County Landfill
Annual CCR Management & Dust Control Report
Permit No. 133-003D(SL)
Proj. No. 840-23-0104**

Dear Ms. Naji:

On behalf of the Waste Industries - Taylor County Landfill we are submitting a copy of the annual report for the subject project.

At this time, the facility is not proposing changes to its permitted operational practices, or adding additional CCR customers or types of CCR shown in the permitted plan. In addition, the facility does not plan to exceed the approved CCR/non-CCR ratio, or otherwise deviate from the approved D&O Plan. Therefore, the facility is not submitting an amended plan and has prepared the attached annual report.

If you have any questions, please call.

Sincerely,



Jeff Browne, P.E.
President

cc: Roy Walton

Annual CCR Management and Dust Control Report



**Taylor County Landfill
Waste Industries USA**
208 Southern States Road
Mauk, GA 31058

Taylor County, Georgia
May 2018



BROWNE
AND COMPANY, LLC

2719 Sheraton Drive • Bldg C, Suite 210

Macon, Georgia 31204

Phone/Fax: 478-743-4843 Browne1234@aol.com

ANNUAL CCR MANAGEMENT AND DUST CONTROL REPORT

In accordance with the guidance document provided by the Georgia Department of Natural Resources, Environmental Protection Division, the following information is provided for compliance with the Solid Waste Regulations 391-3-4.

1. CCR and Non-CCR Waste received during the previous year
 - a) CCR Monofill
 - i. List of type(s) and source(s) of CCR
 - ii. Annual amount of CCR
 - iii. Daily maximum amount of CCR

Not applicable. Taylor County Landfill (TCLF) did not take any CCR waste in a CCR monofill, or monofilled in the MSW landfill facility.

- b) Comingled CCR and Non-CCR Waste
 - i. List of type(s) and source(s) of CCR, and other types of non-CCR waste, such as, municipal, industrial, or commercial solid waste

All CCR-type waste received at the facility was generated by Jacksonville Electrical Authority (JEA), Northside Generating Station. The waste product is a mix of coal combustion residuals and petroleum coke residue from power generation. The fuel ratio of coal to petcoke, as specified by EPA's requirements, does not meet the standard to defined the waste product as CCR. However, for purposes of permitting and disposal at TCLF, the facility treats it as CCR.

- ii. Annual amount of CCR

92,044 tons

- iii. Daily maximum amount of CCR

1200 tons (The average daily amount for disposal in 2017 was 329 tons, with a maximum of 1200 tons.)

iv. Annual amount of non-CCR waste

495,114 tons

v. Daily maximum amount of non CCR waste

3800 tons (The average daily amount for disposal in 2017 was 1768 tons, with a maximum of 3800 tons.)

vi. Maximum ratio of CCR to non-CCR waste

1:5.25 (This ratio of CCR to non-CCR disposed of during 2017 does not exceed the maximum [33%] considered in the design calculations.)

2. Waste Placement, Cover, and Recovery

a) Management and maximum area of the working face

CCR material not used in solidification is restricted to the working face of each cell in such a manner that it is easily incorporated into the municipal waste landfill with available equipment. Almost all of the CCR received at the facility was incorporated in the solidification process and not directly comingled with other waste at the working face. Any CCR waste included in the disposal stream did not restrict proper operations at the working face.

The working face is maintained at a size that is compatible with the facility's available equipment for spreading and compacting waste, and for suppressing dust. The typical working face area is 200 feet by 200 feet. However, occasionally the working face size is adjusted to support unusual weather activity, temporary volume adjustments to the waste stream, to safely stage different waste loads to accommodate truck traffic and allow blending of waste loads during daily operations. The working face size may increase to a maximum of 350 feet by 350 feet. This maximum size does not persist for more than a day.

b) Waste placement and compaction for CCR lifts and comingled waste

Solid waste is spread in uniform layers approximately 2 feet thick, and compacted to its smallest practical volume. Trucks that bring waste to the active area dump loads directly

or using the tipper at the working face. Dozers and compactors spread, compact and blend the waste. Most of the CCR material is used for solidification agent and then used on interior slopes as alternate daily cover. Any CCR material disposed directly at the active working face is blended in with MSW waste during the day's regular disposal activities, and compacted as described above.

- c) Leachate outbreaks frequency, corrective actions taken, and if there is a need to install drainage layers such as chimney drains

Disposing and solidifying CCR did not create additional frequency of outbreaks. Since large isolated blocks of CCR are not disposed during typical daily operations, CCR disposal does not restrict proper operations at the working face. The disposal practices are intended to not create layers of compacted coal ash, and therefore does not increase the occurrence of leachate outbreaks from a reduction in infiltration rates. In addition, when returning to a previously disposed area, the operator excavates windows into the existing layer as the new daily operations begin, using an excavator or a tipped dozer blade. This ensures any lenses are broken open to ensure infiltration through the waste to the leachate collection system at the cell floor.

- d) Daily cover of comingled CCR and non-CCR waste

Alternate daily cover (ADC) generated from the solidification operations is only used on interior slopes. (If it is placed in the working face when it's located at an outside slope, it is treated the same as the other MSW disposed on exterior slopes, and covered with regular soil daily cover.) Solidified CCR used for ADC is typically blended with soil as the daily cover is placed by dumping the material on interior slopes along with cover soil, and spreading with dozers.

- e) Statement verifying that daily inspection reports are kept on-site in accordance with the current D&O Plans.

The following daily logs are maintained on site:

- **Operations Manager Daily Log**
- **Rainfall Log**
- **Water Truck Log & Recirculation Log**

The Operations Manager Daily Log includes the checklist items to ensure compliance with regular solid waste operations, and any dust control logs maintained at the site. The

Operations manager keeps these items in his office in the scalehouse or in his vehicle during normal operating hours.

The Rainfall Log is kept on the active shelf in the scalehouse as part of the operating record.

The Water Truck Log & Recirculation Log are kept in the water truck during normal operating hours. Use of water to control dust is recorded in the log.

- f) Management of solidification operation using CCR as a solidification agent, and sample records of paint filter tests, if applicable

Records for modifications and approvals for solidification are maintained in the Operating Record, and applicable paint filter tests are kept in a log in the Operations Manager's office in the scalehouse.

- g) Recovery of previously disposed CCR for beneficial reuse, if applicable.

Not applicable.

3. Fugitive Dust Control

- a) Actions taken to control CCR fugitive dust from CCR disposal unit, roads, conditioning areas, and solidification operation; and effectiveness of those actions

The Operator utilizes the following measures to minimize the CCR from becoming airborne:

- ensures all trucks transporting CCR are covered
- reduces or halts operations during high wind events
- operates a water spray system, to include passes with a water wagon, supplemented with impact sprinkler heads, supplied by the existing irrigation well when additional control is needed
- applies more frequent cover as needed

Keeping the trucks covered is the most effective way to prevent the escape of dust during transport. Occasionally, trucks were not covered properly, and the Operator indicated to the driver to correct this.

Similarly, there were several days during the past year when the Operator ceased CCR

disposal during high wind periods.

The water wagon proved most effective controlling dust site-wide. Impact sprinkler heads around the road system were also occasionally used, but were not a primary control. In addition a spray bar system was added at the solidification / disposal area. This system is trial-and-error and the Operator is currently fitting new nozzles to provide a more effective misting and dust suppression. The Operator also added hydroseeder equipment at the pit area to add additional dust suppression with spraying of water. This has proved effective in controlling dust. Once the CCR material is solidified for use as ADC, its dusty characteristics are significantly reduced. Therefore, adding more frequent cover was not needed.

b) Records of Citizen Complaints specifically related to CCR Management, if applicable

No citizen complaints related to dust control have been received. Forms for recording these complaints are on site. Employees who may answer the phone are trained to record them on the appropriate form.

c) Recommendations to improve dust control measures in the future, if applicable to CCR Materials

Adding water has proved most effective. The Operator is pursuing ways to expand the hydroseeder-type spraying as well as adding an additional water wagon.

4. Leachate Collection and Removal System (LCRS)

a) Any known issues with the LCRS that are directly attributed to CCR

No known issues with the LCRS have been attributed to disposal of CCR.

5. Storm Water - Management System

a) Narrative describing measures used to ensure that surface water contacting CCR and non-CCR waste has not been discharged into the stormwater management system

Since almost all the CCR disposed at the facility is kept within interior slopes, surface water contacting the material infiltrates the site and is directed to the leachate collection system. The stormwater management system is entirely directed to permitted sediment

ponds. The pond outfalls are monitored semi-annually as part of the approved groundwater and surface water monitoring plan. Monitoring for appendix III (and IV) constituents is part of the plan for surface water points.

6. Waste Compatibility

a) Any incompatibility issues and corrective measures taken

No known issues with compatibility have been attributed to disposal of CCR. During a review meeting, EPD requested that the solidification pit be separated to allow CCR mixed with leachate in a different area than the other solidification processes. A soil berm was installed in the middle of the solidification pit for this purpose.

b) For a solidification process, if CCR is used as a solidification agent

i. List of type(s) and source(s) of CCR and types of liquid waste streams received for solidification prior to disposal

All CCR-type waste received at the facility was generated by Jacksonville Electrical Authority (JEA), Northside Generating Station. The waste product is a mix of coal combustion residuals and petroleum coke residue from power generation.

The liquid wastes include waste process paint sludge, off-spec latex paint, off-spec beverages, liquid soaps and similar materials.

ii. Sample records of compatibility analyses

Liquid wastes are categorized by the site as special waste. New special waste is reviewed by a third party consultant to ensure it meets acceptability requirements, and is compatible with other wastes. Special waste is manifested for disposal. Manifests and special waste reviews are kept on file in the facility Operating Record.

Employees involved with the disposal and solidification of liquid waste and CCR are trained to note any unexpected color changes, unusual odors or evidence of dangerous reactive activity. If this occurs disposal is stopped immediately, and the Operations Manager is notified.

7. Groundwater Monitoring

- a) The Environmental Monitoring Unit will assess groundwater monitoring data and will determine if the groundwater monitoring plan requires revision.

The approved groundwater monitoring plan is in place and the facility is currently in compliance.

8. Emergencies

- a) Any events or circumstances that represented an operational or environmental emergency and the corrective actions taken specific to the management of CCR.

No such events or circumstances were noted during this period. The facility holds weekly safety briefings, which include discussions of the current disposal and solidification locations and any new activities. New hires receive appropriate safety training in accordance with their duties.

9. Documentation of Notification to Local Governments

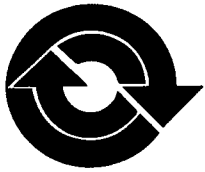
The owner or operator shall notify the local governing authorities of the county, and any city within the county, in which the landfill is located upon submittal of an amended Plan to EPD. Copies of the correspondence to local governing authorities must be provided to EPD with the amended Plan submittal.

An amended plan is not being submitted at this time. The local Governments were previously notified upon the submittal of the previous plan. Copies of the notification letters are attached.

APPENDIX

Appendix A

Notification Letters



WASTE INDUSTRIES

www.wasteindustries.com

208 Southern States Rd | Mauk, GA 31058

Taylor County Landfill

March 23, 2017

Honorable Randall F. Nelson, Chairman
Taylor County Board of Commissioners
7 Ivy Street
Butler, Georgia 31006

**Subject: WI - Taylor County Landfill
CCR Management Plan**

Dear Commissioner Nelson:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."*

The Taylor County Landfill is located within Taylor County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Roy Walton
General Manager

Cc: Jeff Browne, P.E.



WASTE INDUSTRIES

www.wasteindustries.com

208 Southern States Rd | Mauk, GA 31058

Taylor County Landfill

March 23, 2017

Honorable Walter Turner, Mayor
City of Reynolds
P.O. Box 386
Reynolds, Georgia 31076-0386

**Subject: WI - Taylor County Landfill
CCR Management Plan**

Dear Mayor Turner:

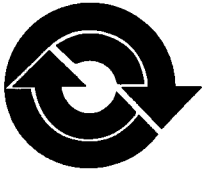
The Rules of Georgia Department of Natural Resources, Environmental Protection Division (EPD) for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."* Furthermore, EPD has prepared a guidance document for CCR Management which states, *"The owner or operator shall notify the local governing authorities of the county, **and any city within the county**, in which the landfill is located upon initial submittal of a CCR Management Plan to EPD."*

The Taylor County Landfill is located within Taylor County, and the City of Reynolds is also in Taylor County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Roy Walton
General Manager

Cc: Jeff Browne, P.E.



WASTE INDUSTRIES

www.wasteindustries.com

208 Southern States Rd | Mauk, GA 31058

Taylor County Landfill

March 23, 2017

Honorable William B. Whitley, Mayor
City of Butler
P.O. Box 476
Butler, Georgia 31006

**Subject: WI - Taylor County Landfill
CCR Management Plan**

Dear Mayor Whitley:

The Rules of Georgia Department of Natural Resources, Environmental Protection Division (EPD) for Solid Waste Management, 391-3-4-.07 (5) state in part that *"The owner or operator shall notify the local governing authorities of any city and county in which the landfill is located upon the submittal of the CCR Management Plan to EPD."* Furthermore, EPD has prepared a guidance document for CCR Management which states, *"The owner or operator shall notify the local governing authorities of the county, **and any city within the county**, in which the landfill is located upon initial submittal of a CCR Management Plan to EPD."*

The Taylor County Landfill is located within Taylor County, and the City of Butler is also in Taylor County, so in accordance with this requirement, we are providing notice that we have submitted a CCR Management Plan to EPD for their review and approval.

Sincerely,

Roy Walton
General Manager

Cc: Jeff Browne, P.E.