

Wilson, Donna

From: Pieter Scheer <pieter@smithgardnerinc.com>
Sent: Thursday, January 24, 2013 12:39 PM
To: Whaley, Mary
Cc: 'Rick Proctor'; Mussler, Ed; Wilson, Donna; pieter@smithgardnerinc.com
Subject: Johnston County Landfill - ADC Evaluation Notification
Attachments: M Whaley Letter 01-24-13 (ADC Notification).pdf

Mary:

Attached is a notification for the County's planned evaluation of auto shredder residue as ADC. Please let me know if you have any questions, comments, or concerns.

Thanks!

Pieter

Pieter K. Scheer, P.E.
Vice President, Senior Engineer

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January 24, 2013

Ms. Mary Whaley
Waste Management Specialist
1646 Mail Service Center
Raleigh, NC 27699-1646

**RE: Alternate Daily Cover Evaluation Notification
 Automobile Shredder Residue (ASR)
 Johnston County MSW Landfill – NC Solid Waste Permit 51-03
 Smithfield, North Carolina**

Dear Ms. Whaley:

On behalf of Johnston County, Smith Gardner, Inc. (S+G) would like to notify you that the County intends to begin an evaluation of the use of automobile shredder residue (ASR) as an alternate daily cover (ADC) in accordance with 15A NCAC 13B .1626(2)(b). This evaluation will begin within the next week and will take place in the County's Phase 4A municipal solid waste (MSW) landfill unit.

ASR (also known as "auto fluff" or "auto shredder fluff") is the residual material remaining after an automobile has been scrapped and the majority of recyclable materials have been recovered. ASR is composed of plastics, rubber, wood, paper, fabric, glass, sand, dirt, and ferrous and non-ferrous metal pieces (EPA, 2012)¹. The ASR accepted at the Johnston County Landfill comes from OmniSource Corporation's processing facility in Smithfield. This material has been shown to be non-hazardous based on test data from the Toxicity Characteristic Leaching Procedure (TCLP) (EPA Method 1311) performed on representative samples.

Johnston County will use the **attached** form to evaluate the performance of the material in controlling vectors, odors, litter, scavenging, and erosion, as well as to document the overall orderliness of the operation. Photos of the ADC will also be taken. Depending on how well the ADC performs, the County will document the performance of the product over a 30 to 60 day period. At the end of this time and assuming the evaluation was successful, the County will submit copies of the documentation and request that the use of ASR be allowed on a permanent basis at the landfill.

Based on prior evaluations at other facilities, the following general operational guidelines will be followed during the trial period:

¹ USEPA (2012), "Automotive Parts," at *Wastes – Resource Conservation – Common Wastes and Materials* (www.epa.gov/epawaste/conserves/materials/auto.htm).

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- ASR used as ADC will be placed a minimum of 6-inches thick over other solid wastes daily.
- ASR may be temporarily stockpiled each working day near the working face of the landfill. However, all stockpiled ASR will either be buried or used as ADC by the end of each working day.
- ASR will only be used as ADC on interior slopes. Soil will be used as daily cover once per week over areas where ASR has been used as ADC.
- ASR will not be used as intermediate cover.

Please contact me at your earliest convenience with any questions or concerns you may have on this evaluation.

Sincerely,
SMITH GARDNER, INC.



Pieter K. Scheer, P.E.
Vice President, Senior Engineer
pieter@smithgardnerinc.com

Attachment

cc: Rick Proctor, Johnston County
Ed Mussler, P.E., NC DWM
Donna Wilson, NC DWM

Date: _____

By: _____

**Johnston County Landfill
Alternative Daily Cover (ADC)
Performance Evaluation Form**

Weather Conditions: Wind Direction: _____ Wind Speed: _____ Temperature: _____ Precipitation: _____	General Description of ADC: Auto Shredder Residue (ASR) (6-Inch Minimum Thickness)
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Please rank the performance of the Alternative Daily Cover (ADC) based upon the following attributes. Circle the number value that best describes the ADC performance compared with soil cover.

Vector Control: Ability to resist vectors	EXCELLENT ----> POOR 1 2 3 4 5	Comments:
Odor Control: Odor from ADC covered surfaces	EXCELLENT ----> POOR 1 2 3 4 5	Comments:
Litter Control: Ability to minimize litter	EXCELLENT ----> POOR 1 2 3 4 5	Comments:
Scavenging Control: Ability to prevent scavenging	EXCELLENT ----> POOR 1 2 3 4 5	Comments:
Erosion Control: Ability to control erosion	EXCELLENT ----> POOR 1 2 3 4 5	Comments:
Orderliness of Operation: Overall appearance of working face/slopes	EXCELLENT ----> POOR 1 2 3 4 5	Comments:

Fire Control: Please describe any fire event that may have occurred and the impact of the ADC and equipment, if any.

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Additional Comments:

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