

Public Notice

DEQ Requests Comments on a Proposed Solid Waste Permit Renewal for the Riddle Ash Landfill

Comments due: 5 p.m., June 21, 2019

Project location: Riddle Ash Landfill, Riddle Bypass Road, Riddle, Douglas County

Proposal: The Oregon Department of Environmental Quality proposes to renew the solid waste permit for the Riddle Ash Landfill. The permit would authorize the continued operation of the landfill in a manner that protects the environment and in conformance with the requirements, limitations and conditions set forth in the permit and in the DEQ-approved Operations Plan. The landfill is not open to the public. Roseburg Forest Products owns, operates and maintains the facility.

Highlights: This permit authorizes the facility to continue to accept and dispose fly-ash generated from air quality control devices (for example electrostatic precipitators) only from Roseburg Forest Products owned facilities. No waste other than the aforementioned materials may be accepted without DEQ's written approval. Current operations would not change under the proposed renewal.

DEQ reviewed the facility's solid waste permit file and found one compliance issue during the current 10-year permit period. DEQ issued a warning letter in August 2012 due to a partial buffer zone infraction that occurred on July 25, 2012 when landfill leachate was inadvertently sprayed on the log deck adjacent to "R" Street. The violation was immediately corrected. The most recent compliance inspection was completed on April 29, 2019. The facility was in compliance with all permit conditions at that time.

How to comment: Send comments to DEQ Permit Coordinator, Denise Miller, at 165 E. Seventh Ave., Suite 100, Eugene, OR 97401 or miller.denise@deq.state.or.us.

Find more information: View the draft permit and permit evaluation electronically by scrolling down in this document or going to <http://www.oregon.gov/deq/Get-Involved/Pages/Public-Notices.aspx>. To request a copy be mailed to you, contact Denise Miller, DEQ permit coordinator, at 541-687-7465 or miller.denise@deq.state.or.us. For questions on the permit, contact David Esch at 541-776-6148 or esch.david@deq.state.or.us.

If you want to review the application and related documents in person at the DEQ office at 165 E. Seventh Ave., Suite 100, Eugene, OR 97401, please contact Denise Miller, DEQ permit coordinator, at 541-687-7465 or miller.denise@deq.state.or.us, to set up an appointment.

The next step: DEQ considers and responds to all comments received and may modify the proposed permit based on comments.

Alternative formats: DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.



State of Oregon
Department of
Environmental
Quality

**Western Region
Materials Management
Program**

165 E Seventh Ave.
Eugene OR 97401
Phone: 541-687-7465
800-849-8477

Fax: 541-686-5441

Contact: [Denise Miller](mailto:Denise.Miller@deq.state.or.us)

Email: miller.denise@deq.state.or.us
[us](http://www.oregon.gov/DEQ)

www.oregon.gov/DEQ



DEQ

State of Oregon
Department of
Environmental
Quality

SOLID WASTE DISPOSAL SITE PERMIT: Industrial Solid Waste Landfill - Active

Oregon Department of Environmental Quality
165 E. Seventh Ave., Suite 100
Eugene, OR 97401-3049
541-687-7465

Issued in accordance with the provisions of Oregon Revised Statute Chapter 459; Oregon Administrative Rules 340, Divisions 90, 93, 95, 96 and 97; and subject to the Land Use Compatibility Statement referenced below.

Issued to:

Roseburg Forest Products Co.
PO Box 1088
Roseburg, OR 97470
541-679-2130

Facility name and location:

Riddle Industrial Disposal Site
Riddle Bypass Road
Riddle, OR 97469
42 57 N; -123 22 W

Owner:

Roseburg Forest Products Co.
PO Box 1088
Roseburg, OR 97470
541-679-2130

Operator:

Roseburg Forest Products Co.
PO Box 1088
Roseburg, OR 97470
541-658-6107
AmandaO@rfpco.com

ISSUED IN RESPONSE TO:

- A solid waste permit renewal application received Dec. 3, 2018
- A Land Use Compatibility Statement from Douglas County Dated Oct. 2, 2008
- A Conditional Use Permit from Douglas County dated May 29, 2007
- A Solid Waste Disposal Site Compatibility Statement from Douglas County dated March 5, 2009

The determination to issue this permit is based on findings and technical information included in the permit record.

ISSUED BY THE OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY

Brian Fuller, Manager
Western Region Materials Management
Permitting and Compliance

Date

Permitted Activities

Until such time as this permit expires or is modified or revoked, the permittee is authorized to operate and maintain a solid waste land disposal site in conformance with the requirements, limitations, and conditions set forth in this document including all attachments.

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Introduction

This document is a solid waste permit issued by the Oregon Department of Environmental Quality (DEQ) in accordance with Oregon Revised Statutes (ORS) 459 and Oregon Administrative Rules (OAR), Chapter 340.

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Template last Updated 10/5/2016

PERMIT ADMINISTRATION

1 Permit Issuance

1.1 Permittee

This permit is issued to: Roseburg Forest Products Co.

1.2 Permit number

This permit will be referred to as Solid Waste Permit Number: 1386.

1.3 Permit term

The permit is issued on the date it is signed.

The permit's expiration date is May 31, 2029.

1.4 Facility type

The facility is permitted as an industrial waste landfill.

1.5 Facility owner/operator

The owner of this facility is: Roseburg Forest Products Co.

The operator of this facility is: Roseburg Forest Products Co.

1.6 Basis for permit issuance

This permit is issued based upon the following documents submitted by the permittee:

- Solid waste permit renewal application received Dec. 3, 2018
- Land Use Compatibility Statement from Douglas County dated Oct. 2, 2008
- A Conditional Use Permit from Douglas County dated May 29, 2007.

1.7 Definitions

Unless otherwise specified, all terms are as defined in OAR 340-093-0030.

1.8 Legal control of property

The permittee must at all times maintain legal control of the disposal site property, including maintaining a current permit, contract or agreement that allows the operation of the facility if the site is not owned by the permittee.

1.9 Submittal & notification address

All submittals to DEQ, unless otherwise noted, must be sent to:

Oregon Department of Environmental Quality
Manager, Materials Management Program
165 E. Seventh Ave., Suite 100
Eugene, OR 97401-3049
Telephone: 541-687-7465

All submittals must include, at a minimum, one paper copy and one electronic copy in a format approved by the DEQ permit manager. Note that some submittals may require more paper copies. Therefore, the permittee must confirm with the permit manager how many copies are necessary prior to submittal of a document.

Note: Whenever possible, the permittee must submit two-sided paper copies of all reports. DEQ may accept electronic submittals for portions of some reports, as approved in the Environmental Monitoring Plan or by DEQ.

2 Disclaimers

2.1 Property rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights.

2.2 DEQ liability

DEQ, its officers, agents, or employees do not sustain any liability on account of the issuance of this permit or on account of the construction, maintenance, or operation of facilities pursuant to this permit.

3 Authority

3.1 Ten year permit

This permit is issued for a maximum of ten years as authorized by Oregon Revised Statutes 459.245 (2).

3.2 Documents superseded

This document is the primary solid waste permit for the facility, superseding all other solid waste permits issued for Roseburg Forest Product's Riddle Industrial Disposal Site by DEQ.

3.3 Permittee responsibility and liability

Conditions of this permit are binding upon the permittee. The permittee must conduct all facility activities in compliance with the provisions of this permit. The permittee is liable for all acts and omissions of the permittee's contractors and agents in carrying out the operations and other responsibilities pursuant to this permit.

3.4 Other compliance

This permit's issuance does not relieve the permittee from the responsibility to comply with all other applicable federal, state, or local laws or regulations, including the following solid waste requirements, and any future updates or additions to these requirements:

- Solid waste permit renewal application received Dec. 3, 2018
- Oregon Revised Statutes, Chapters 459 and 459A
- Oregon Administrative Rules Chapter 340
- Any documents submitted by the permittee and approved by DEQ

3.5 DEQ access to disposal site

The permittee shall allow representatives of DEQ access to the disposal facility at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data and carrying out other necessary functions related to this permit.

Reference: OAR 340-093-0050(6)

3.6 Penalties

Violation of permit conditions will subject the permittee to civil penalties of up to \$25,000 for each day of each violation.

Reference: ORS 459.995(1)(a)

4 Permit Modification

4.1 Five year review

In the permit's 4th to 6th year, DEQ may review the permit and amend it if necessary. DEQ will consider the following factors in making this determination:

- Compliance history of the facility
- Changes in volume, waste composition, or operations at the facility
- Changes in state or federal rules which should be incorporated into the permit

- A significant release of leachate or contaminated dust to the environment from the facility
- Significant changes to a DEQ-approved site development plan, and/or conceptual design
- Other significant information or events

4.2 Permit modification

DEQ or the permittee may propose to change the permit at any time during the permit term.

Once approved by DEQ, any permit-required plans become part of the permit by reference. DEQ may provide notice and opportunity for review of permit-required plans.

4.3 Modification and revocation by DEQ

The DEQ Director may, at any time before the expiration date, modify, suspend, or revoke this permit in whole or in part, in accordance with Oregon Revised Statutes 459.255, for reasons including but not limited to the following:

- Violation of any terms or conditions of this permit or violation of any applicable statute, rule, standard, or order of the commission
- Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts
- A significant change in the quantity or character of solid waste received or in the operation of the disposal site

4.4 Modification by permittee

The permittee must apply for a modification to this permit if there is a significant change in facility operations or a deviation from permitted activities.

4.5 Public participation

DEQ will issue a public notice to inform the public of any significant changes to the permit.

4.6 Changes in ownership or address

At least 10 days in advance, the permittee must report to DEQ any change in the facility's ownership or the permittee's or operator's name and/or address.

Reference: OAR 340-093-0070(6)(a)(A)

ALLOWABLE ACTIVITIES

5 Authorizations

5.1 Wastes authorized for receipt

This permit authorizes the facility to accept: fly ash.

No other wastes are authorized for acceptance and/or disposal.

5.2 Authorization of other waste

DEQ may authorize the permittee to accept other waste if:

- The permittee develops a Special Waste Management Plan and submits it to DEQ for review and approval
- DEQ approves the Special Waste Management Plan
- The permittee can demonstrate that the materials are not hazardous waste, as defined by state and federal regulations or otherwise a threat to human health or waters of the state.

5.3 Authorization of activities

All facility activities are to be conducted in accordance with the provisions of this permit. All plans required by this permit become part of the permit by reference once approved by DEQ. Any conditions of the approval are also incorporated into this permit unless contested by the permittee within 30 days of the receipt of a conditional approval.

5.4 Salvaging and recycling

This permit authorizes the permittee to conduct salvaging and recycling in a controlled and orderly manner. The permittee must notify DEQ prior to changing salvaging and recycling operations.

6 Prohibitions**6.1 Hazardous waste disposal**

The permittee must not accept any regulated hazardous wastes.

Reference: 40 CFR 258.20 (b) and OAR 340-101.

In the event discovered wastes are hazardous or suspected to be hazardous, the permittee must, within 24 hours, notify DEQ and initiate procedures to identify and remove the waste. Hazardous wastes must be removed within 90 days, unless DEQ approves otherwise. The permittee's temporary storage and transportation practices must comply with DEQ rules.

6.2 Liquid waste disposal

The permittee must not accept liquid waste for disposal.

Definition: Liquid waste is waste that does not pass the paint filter test performed in accordance with EPA Method 9095B.

6.3 Open burning

The permittee must not conduct any open burning at the site.

6.4 Stockpiling of waste

The permittee is not allowed to temporarily or permanently stockpile solid waste outside the footprint of the active landfill.

6.5 Exclusion of other generator waste

The permittee must not dispose any waste that is not generated by the permittee.

OPERATIONS AND DESIGN**7 Operations Plan****7.1 Operations plan submittal**

The permittee must operate and maintain the facility in accordance with the most current approved Operations Plan and keep a copy of the DEQ-approved Operations Plan in the facility file readily available for DEQ inspection and review.

Within 90 days of the permit issue date, the permittee must review and submit any necessary updates to the site Operations Plan to DEQ for review and approval. The updated plan must be consistent with the conditions of this permit. A Department-approved plan becomes an integral part of the permit.

7.2 Plan content

The Operations Plan must describe facility operations, including the elements listed below, and demonstrate how the facility will comply with all regulatory and permit requirements:

General Topics	Describe plans or procedures for:
General operations	<ul style="list-style-type: none"> Types and quantities of waste materials that will be received (estimated maximum daily and average annual quantities)

General Topics	Describe plans or procedures for:
	<ul style="list-style-type: none"> • A program for detecting and preventing the disposal of unauthorized or prohibited waste • Handling and removing unauthorized waste discovered at the facility • Managing landfill gas • Managing landfill leachate in compliance with Subsection 9.15 • Designing surface water and erosion control structures • Responding to non-compliance events or situations • Types and weights of equipment to be used for site operation
Disposal operations	<ul style="list-style-type: none"> • Methods of waste unloading, placement, compaction and covering • Detecting and preventing the disposal of regulated hazardous waste and any other DEQ-prohibited waste • Disposing of special waste • Fill progression and phasing
Special Waste Management Plan	<ul style="list-style-type: none"> • Identifying and characterizing special waste (for example: waste which require special management or waste streams not otherwise authorized by this permit) • Identifying the source of all special waste • Determining appropriate handling and disposal procedures • Documenting Solid Waste Management Plan implementation, including waste characterization and location of waste disposition • <u>References:</u> OAR 340-093-0190, OAR 340-095-0020(3)(j)
Ancillary operations	<ul style="list-style-type: none"> • Waste unloading and handling • Placing and maintaining interim cover over inactive landfill areas • Managing transfer containers • Detailed description of any salvaging or resource recovery operations to take place at the facility • Measures to be used for the control of fire, dust, decomposition gases, birds, disease vectors, scavenging, access, flooding, erosion, and blowing debris, as pertinent
Inspection and maintenance	<ul style="list-style-type: none"> • Washing equipment • Maintaining leachate and gas collection systems • Maintaining monitoring stations and devices • Periodically inspecting the continuity and integrity of primary leachate collection pipes • Maintaining surface water control structures
Operating record	<ul style="list-style-type: none"> • Establishing and maintaining the operating record
Contingency	<ul style="list-style-type: none"> • Backup methods for storing and/or disposing of leachate • Providing fire protection equipment, and arrangements made with local fire control agency and • Notifying DEQ about emergencies and fires • Areas and/or procedures to be used for disposal of waste materials during inclement weather

Reference: OAR 340-094-0040 describes requirements for preparation of an operations plan.

7.3 Plan updates

The permittee must update and revise both the Operations Plan and the Operations and Maintenance Manual as necessary to reflect current and future facility conditions and procedures.

The permittee must submit any associated revisions or updates to DEQ for review and approval.

7.4 Plan compliance

The permittee must operate the facility in accordance with the approved Operations Plan, including any amendments.

8 Recordkeeping and Reporting – Operations**8.1 Non-compliance reporting**

The permittee must take immediate corrective action for any violations of permit conditions or DEQ rules and notify DEQ at: 541-687-7465

DEQ response: DEQ may investigate the nature and extent of the compliance problem and evaluate the adequacy of the permittee's corrective action plans.

8.2 Permit display

The permittee must display this permit where operating personnel can easily find it and refer to it.

8.3 Access to records

DEQ must have access, when requested, to all records and reports related to the permitted facility.

8.4 Procedure

The permittee's recordkeeping and reporting procedures are as follows:

Step	Action
1	Keep the Operating Record at the facility or at another DEQ-approved location.
2	During facility operations, record the amount of waste received in cubic yards or tons. Record "0" if that waste is not received.
3	Submit the information collected in Step 2 above on the Solid Waste Disposal Report/Fee Calculation form provided by DEQ. Pay solid waste fees as required by OAR 340-097. <u>Date due:</u> March 31 of each year for the previous calendar year.
4	Retain copies of all records and reports for five years after they were created.
5	Update all records to reflect current conditions at the facility.

8.5 Submittal address

Send required submittals to:

Oregon Department of Environmental Quality
Materials Management Program
700 NE Multnomah St., Suite 600
Portland, OR 97232
Telephone: 503-229-5409

9 Specific Operating Conditions

9.1 Discovery of prohibited waste

If the permittee discovers prohibited waste, the permittee must notify DEQ within 48 hours and begin to isolate or remove the waste. In addition the permittee must take digital photos of the prohibited waste to document its quantity, nature, identity and source.

In the event discovered wastes are hazardous or suspected to be hazardous, the permittee must, within 7 days, notify the Department and initiate procedures to identify and remove the waste. Within 90 days following the discovery, the permittee must transport non-putrescible, non-hazardous prohibited waste to a disposal or recycling facility authorized to accept such waste, unless otherwise approved or restricted by DEQ. The permittee must obtain DEQ's written approval to store putrescible, non-hazardous, prohibited waste.

9.2 Spills notification

Oregon Revised Statue 466.635 and Oil and Hazardous Materials Emergency Response Rules, Chapter 340, Division 142 require immediate notification to Oregon Emergency Response System after taking any required emergency actions to protect human health and the environment when oil or hazardous materials are spilled. The spill must be immediately reported to OERS at 1-800-452-0311 if the spill is of a reportable quantity. Reportable quantities include:

- Any amount of oil spilled to waters of the state
- Oil spills on land in excess of forty-two gallons
- Two hundred pounds (25 gallons) or more of spilled pesticide residue
- Spills of hazardous materials that are equal to, or greater than, the quantity listed in the Code of Federal Regulations, 40 CFR Part 302 (List of Hazardous Substances and Reportable Quantities), and amendments adopted before July 1, 2002

For a complete list of hazardous materials required to be reported, please refer to OAR 340-142-0050.

9.3 Access roads

The permittee must provide all-weather access roads from the landfill property line to the active operational area and the environmental monitoring stations, and maintain them in a manner that prevents traffic hazards, dust and mud.

The permittee must use appropriate means, including truck washing, as needed to prevent haul trucks from tracking mud on external roadways outside the landfill boundaries. Any truck washing activities must be conducted on a hard surface and any disposal of waste water must be accomplished in a manner approved by DEQ.

9.4 Unloading area

The area(s) for unloading incoming waste must be clearly defined by signs, fences, barriers or other devices.

9.5 Interim cover

The permittee must place and maintain interim cover over fill areas that will not receive additional waste for a period over 180 days with a six inch, or thicker, layer of compacted soil or with a DEQ-approved alternative cover material. Unless otherwise approved by DEQ, the permittee must re-vegetate any soil cover that will remain exposed for more than two years and otherwise maintain any geosynthetic cover in working condition.

9.6 Soil erosion

The permittee must minimize and control soil erosion to prevent damage to the intermediate or final cover and sediment transport to off-site surface waters or off-site properties.

9.7 Storm water drainage structures

The permittee must maintain all stormwater drainage structures in good functional condition, and report to the DEQ any significant malfunctions or damage to these structures. The permittee must complete repairs within 30 days of discovering the problem unless DEQ approves an alternative schedule.

9.8 Leachate management

The permittee must operate the disposal site in a manner that deters leachate production to the maximum extent practicable, and construct, operate and maintain in good functional condition all DEQ-approved leachate containment, collection, detection, removal, storage and treatment systems. The permittee must remove leachate continuously from all landfill leachate collection systems, to minimize fluid buildup on the bottom liner and prevent the hydraulic head (fluid depth) from exceeding one foot.

9.9 Air Emissions

The permittee must control air emissions, including dust, malodors, air toxics, etc. related to disposal site construction, operation and other activities, and comply with DEQ air quality standards including applicable visible emissions and nuisance requirements in OAR 340-208.

9.10 Site access control

The permittee must control public access to the landfill as necessary to prevent unauthorized entry and dumping. The permittee must maintain perimeter barriers or topographic constraints that restrict unauthorized entry to the site.

9.11 Site screening

The permittee must screen the active disposal area from public view, to the extent practical, with trees, shrubbery, fencing, stockpiled cover material, earthen berms, or other appropriate means.

9.12 Water supply

The permittee must provide water in sufficient quantities for fire protection, dust suppression, establishment of vegetation, and other site operations requiring water.

9.13 Complaint log

The permittee must maintain a log of all complaints received including complaints received in writing (including email), via telephone, or in person that specifically refer to dust, odor or other nuisance conditions caused by this facility. The log must also record the permittee's actions to investigate and validate the complaint. The permittee must resolve the problem, if possible, within two working days, but no longer than 10 working days after receiving the complaint.

10 Site Development and Design

10.1 Site development plan

The permittee must develop the site in accordance with the most current, DEQ-approved site development plan. The permittee must update the plan as needed to reflect any changes in site development and design that occur over time and submit plan revisions to DEQ for review and approval.

Reference: The *Solid Waste Landfill Guidance*, September 1996, describes the basic elements of a site development plan. Organizing the plan in accordance with the guidance will expedite DEQ's review.

10.2 Baseline design criteria

New disposal units must include the following engineering controls:

- A liner system, composed of a DEQ-approved geomembrane [at least sixty mils thick for linear low density polyethylene, or a DEQ-approved alternative geomembrane]
- A primary leachate collection and removal system which fully covers the liner system and maintains a leachate depth of less than one foot above the liner. All leachate collection pipes must be serviceable for cleaning
- Leachate collection sump(s)
- An operations layer that covers and protects the LCRS and liner system from physical damage

10.3 Design plans

At least six months prior to the anticipated construction date for new disposal units, closure of existing units, or development of other ancillary facilities, the permittee must submit engineering design plans to DEQ for review and approval. The design plans must be prepared and stamped by a qualified professional engineer with current Oregon registration and specify and/or provide the following:

- All applicable performance criteria, construction material properties and characteristics, dimensions and slopes
- The design basis and all relevant engineering analyses and calculations

10.4 Construction requirements

The permittee must construct all improvements in accordance with:

- The approved plans and specifications
- Any DEQ-imposed conditions of approval
- Any future DEQ-approved amendments to the plans and specifications

10.5 Construction documents

Prior to constructing any landfill engineering controls (e.g., final cover, new disposal unit or other waste containment facilities or improvements), the permittee must submit complete construction documents and receive the DEQ's written approval. The construction documents must:

- Define the construction project team
- Specify material and workmanship requirements to guide the constructor in executing work and furnishing products
- Include a construction quality assurance plan that describes how the project team will monitor the quality of materials and the constructor's work performance and ensure compliance with project specifications and contract requirements

Reference: Follow the current *Solid Waste Guidance* to expedite DEQ review of the construction documents.

10.6 Construction inspection

During construction of a new landfill disposal unit, final cover system, or any other landfill controls or engineered features, the permittee must provide to DEQ a summary and schedule of planned construction activities to facilitate DEQ's inspection and oversight.

10.7 Construction report submittal

Within 90 days of completing construction of a new landfill disposal unit, a final cover system, or other engineering controls, the permittee must submit to DEQ a construction certification report prepared by a qualified independent party. The report must document and certify that the construction of all required components and structures complies with this permit and the DEQ-approved design plans and specifications.

10.8 Construction report content

The construction report must include:

- An executive summary describing the construction project and any major problems encountered
- A list of the governing construction documents
- A summary of all construction and CQA activities
- The manufacturer's written certifications that all geosynthetic materials conform with project specifications
- Test data documenting that soil materials conform with project specifications
- A summary of all construction quality assurance observations, including daily inspection records and test data sheets documenting that materials deployment and installation conform with project specifications
- A description of the problems encountered and the corrective measures implemented

- The designer's acceptance reports for errors and inconsistencies
- A list/description of any deviations from the design and material specifications, including justification for the deviations, copies of change orders and recorded field adjustments, and copies of the DEQ's written approvals for deviations and change orders
- Signed certificates for subgrade acceptance prior to deployment of the geomembrane liner
- Photographs and as-constructed drawings, including record surveys of the subgrade, geomembrane liner, granular drainage layer and protective soil/operations layer
- The certification statement(s) and signatures of the construction quality assurance consultant, designer, and facility owner. One of these representatives must be a professional engineer with current Oregon registration

10.9 Approval to use new disposal units

The permittee must not dispose of solid waste in newly constructed disposal units until DEQ has accepted the Construction Certification. If the DEQ does not respond to the construction certification report within 30 days of its receipt, the permittee may place waste in the disposal unit.

SITE CLOSURE

11 Closure Construction and Maintenance

11.1 Closure, post-closure plans

The permittee must maintain up-to-date copies of the conceptual "worst-case" closure plan and the conceptual post-closure plan in the facility records.

11.2 Notification of plan updates

The permittee must notify DEQ and receive DEQ approval for any changes or updates to the conceptual "worst-case" closure and conceptual post-closure care plans.

11.3 Closure permit

The permittee must apply for a closure permit at least five years prior to the landfill's anticipated final closure.

Reference: OAR 340-095-0050

11.4 Closure plan approval

At least six months prior to final closure of any portion of the landfill, the permittee must submit detailed engineering plans, specifications, and a closure schedule to DEQ for review and approval.

The design plans must be prepared and stamped by a qualified professional engineer with a current Oregon registration and specify and/or provide the following:

- All applicable performance criteria, construction material properties and characteristics, dimensions and slopes
- The design basis and all relevant engineering analyses and calculations

Reference: The *Solid Waste Landfill Guidance, September 1996*, describes Closure Plan preparation. Following that format will expedite DEQ review of the plan.

11.5 Closure schedule

The permittee must close each landfill area or unit in accordance with a DEQ-approved schedule.

11.6 Final cover

Unless DEQ approves otherwise, the final landfill cover must meet the following design and performance criteria:

- Three feet of compacted soil of a type approved by DEQ which is graded to a slope of not less than 2 percent or greater than 30 percent; and at least 12 inches of topsoil capable of sustaining a dense, healthy growth of native vegetation.

11.7 Vegetation

Unless DEQ approves otherwise, the permittee must establish and maintain a dense, healthy growth of native vegetation over the closed areas of the landfill consistent with the proposed final use for the site.

11.8 Surface contour maintenance

The permittee must maintain the landfill cover and final surface contours in a manner that prevents erosion and surface-water ponding to the maximum degree practicable. The permittee must ensure that all waste remains covered, and repair and maintain all areas affected by settlement or erosion, by adding soil, re-grading, and seeding and fertilizing as needed.

11.9 Deed record

Within 30 days after the disposal site's final closure, the permittee must record the presence of the waste in the property deed record on file with Douglas County including a detailed description of the site including a plat, the general types and location of wastes deposited, depth of waste and other information of probable interest to future landowners.

12 Financial Assurance

12.1 Financial assurance plan

The permittee must maintain the approved financial assurance plan and provide financial assurance for the costs of site closure, post-closure care, and corrective action (if applicable). The permittee must keep the current financial assurance plan in the facility file.

Reference: The plan must be prepared in accordance with OAR 340-095-0090. Acceptable mechanisms are described in OAR 340-095-0095.

12.2 Recertification of financial assurance

The permittee must review and update financial assurance annually in accordance with OAR 340-095-0090(6)(d). Prior to April 30 of each year, the permittee must submit to DEQ one copy of the Annual Financial Assurance Recertification Report, signed by:

- A permittee representative who possesses the requisite authority to commit the permittee to the certification
- As required by OAR 340-095-0090(4)(a) any changes to the cost estimate for closure, post-closure or corrective action used as a basis for meeting the financial assurance requirement must be prepared and signed and stamped by a professional engineer, with current Oregon registration

12.3 Use of financial assurance

The permittee must not use the financial assurance for any purpose other than to finance the permitted facility's approved closure, post-closure, and corrective action activities or to guarantee that those activities will be completed.

12.4 Long-term financial responsibility

The permittee must continuously maintain financial assurance for the facility until DEQ no longer requires the permittee or other person owning or controlling the site to demonstrate financial responsibility for closure, post-closure care, or corrective action (if required).

ENVIRONMENTAL MONITORING

13 Site Characterization

13.1 Approved landfill footprint

The current permitted landfill footprint is defined by the DEQ approved Site Characterization Report, dated Sept. 19, 2008 and may include the current active area, future planned landfill cells and leachate collection and processing areas.

14 Environmental Monitoring Plan

14.1 Environmental Monitoring Plan contents

Any future changes to the current plan must maintain the environmental monitoring program in a manner that will characterize potential facility impacts. The updated plan may consist of the previously approved plan with any subsequent changes or additions (i.e., approved permit-specific concentration limits, revised parameter lists, revised schedules, new wells, etc). At a minimum, any updated plan should address the issues and topics found in Section 10 of DEQ's Solid Waste Guidance dated Sept. 1, 1996 and any updated guidance.

14.2 Environmental Monitoring Plan revisions and updates

A geologist or certified engineering geologist, with current Oregon registration, must prepare and stamp the plan revisions and submit two copies to DEQ for review and approval.

14.3 Long-term monitoring plan

If Risk-Based Concentration Limits (RBCs), Permit-Specific Concentration Limits (PSCLs), Concentration Limit Variances (CLVs), Action Limits (ALs), or Site-Specific Limits (SSLs) are established, the permittee must update the plan to reflect the long-term monitoring program and submit the updated plan for DEQ review and approval.

Note: Also see this permit's requirements for establishing PSCLs, ALs, or SSLs and OAR 340-040-0030(4) for procedures to establish CLVs.

14.4 Additional monitoring points

The permittee must incorporate any new or replacement monitoring point or device into the Environmental Monitoring Plan and submit the updated plan to DEQ for review and approval.

15 Environmental Sampling Requirements

15.1 Notification of sampling events

The permittee must notify DEQ, in writing, at least ten working days prior to a scheduled sampling event.

15.2 Split sampling events

The permittee must split samples with DEQ at DEQ's request, and schedule split-sampling events with the DEQ's laboratory at least 45 days ahead of time.

Oregon Department of Environmental Quality
Laboratory, Groundwater Monitoring Section
7202 NE Evergreen Parkway, Suite 150
Hillsboro, OR 97124
Phone: 503-693-5700
Fax: 503-693-4999

15.3 Monitoring schedule

The permittee must refer to the approved plan for scheduling environmental monitoring events.

15.4 Monitoring

The permittee must monitor the facility in accordance with:

1. The approved Environmental Monitoring Plan
2. Any conditions of the DEQ's approval
3. Any DEQ-approved amendments and updates

15.5 Changes in sampling or split sampling

The permittee must submit a written request and obtain the DEQ's written approval before changing the sampling program, including sampling frequency, parameters, or locations. Such approved changes will become an integral part of the Environmental Monitoring Plan.

DEQ reserves the right to add to or delete from the list of scheduled sampling events, sampling locations, and sampling parameters, and to conduct unscheduled sampling or split sampling events.

If the split-sampling schedule changes, DEQ will try to notify the permittee at least 30 days prior to the next scheduled event.

16 Establishing Permit-Specific Concentration Limits, Action Limits, Concentration Limit Variances, and Site Specific Limits

16.1 Gathering data

The permittee must monitor the designated background wells in accordance with the approved Environmental Monitoring Plan or propose an alternative intrawell approach. Background monitoring must continue until all necessary data sets have been collected, and PSCLs, ALs, and/or SSLs are proposed for each non-hazardous parameter of concern. The permittee then must demonstrate to DEQ's satisfaction that the selected background-data set is valid and unaffected by facility releases.

16.2 Future disposal units or cells

Before using a new landfill unit or cell for waste disposal, the permittee must collect enough samples to determine background groundwater quality.

16.3 Statistical analysis

To establish compliance concentration limits (PSCLs, ALs, and SSLs), the permittee must perform statistical evaluations of the monitoring results for each sampling event.

Use methods outlined in 40 CFR 258.53 or other Department accepted statistical methods.

Reference: Internal Management Directive for Developing Concentration Limits at Permitted Solid Waste Facilities, DEQ, 2011.

16.4 Proposing PSCLs, ALs, and/or SSLs

The permittee must propose for DEQ's review and approval, a PSCL, AL, or SSL pursuant to the guidelines specified in OAR 340-040. The proposal must address all required parameters of interest. Once a statistically valid data set (at least nine acceptable data points) are established from the appropriate background well(s), the permittee may generate a PSCL, AL, or SSL for each designated, long-term monitoring parameter.

16.5 Changing PSCLs, ALs, and/or SSLs

If the permittee demonstrates to DEQ's satisfaction that background groundwater quality has significantly changed since the PSCL, AL, or SSL was established, and if the change is unrelated to the permitted facility's influence, the permittee can propose, to DEQ a revised level for the affected PSCL(s), AL(s), or SSL(s).

This does not apply to intrawell comparisons, only to interwell methods.

16.6 Establishing and changing CLVs

The permittee should refer to DEQ's Groundwater Quality Protection Rules [OAR 340-040-0030(4)] for guidance in establishing and changing Concentration Limit Variances (CLVs).

17 Environmental Monitoring Standards

17.1 Applicable regulatory standard

The permittee must not allow the release of any substance from the landfill into groundwater, surface water, or any other media which will result in a violation of any applicable federal or state air or water limit, drinking water rules, or regulations, beyond the solid waste boundary of the disposal site or an alternative boundary specified by DEQ. Refer to OAR 340-095-0040.

17.2 Compliance points

Compliance wells are defined in the most current site-specific Environmental Monitoring Plan.

17.3 Review of results

The permittee must review the analytical results after each monitoring event according to the protocols established in the most currently approved site-specific Environmental Monitoring Plan.

17.4 Resampling results

Upon receipt of data from resampling, the permittee must review the analytical results according to the protocols established in the most currently approved site-specific Environmental Monitoring Plan.

17.5 Certified environmental laboratory data

To ensure the best possible data quality, DEQ suggests that the permittee contract with environmental labs certified under the Oregon Laboratory Accredited Program (ORLAP) or the National Volunteer Laboratory Accreditation Program (NVLAP). The permittee should include a copy of the lab's certification with every data submittal. Use of an ORLAP or NVLAP approved lab will facilitate DEQ's future review of Environmental Monitoring Plan (EMP) updates, Annual Environmental Monitoring Reports (AEMRs), and RI/FS documents.

18 Recordkeeping and Reporting – Environmental Monitoring

18.1 Annual Environmental Monitoring Report (AEMR)

Prior to April 1 of each year, the permittee must submit to DEQ one copy of an annual monitoring report for the past year's monitoring period (July 1 to June 30). The report must conform to the approved plan format and be prepared and stamped by a geologist or a certified engineering geologist, with current Oregon registration.

Note: Whenever possible, the permittee must submit two-sided copies of all reports and may submit electronic submittals of reports.

18.2 Statement of compliance

The report must include a brief (approximately one-page) cover letter that:

- Compares the analytical results with the relevant monitoring standards (RBCs, PSCLs, CLVs, ALs, or SSLs)
- Documents any exceedances of federal or state standards for relevant media
- Documents any significant change in water quality, land quality, or air quality in monitored media

18.3 Annual Environmental Monitoring Report contents

The report must reflect current conditions at the facility, and the content of the most recently approved plan, and present accurate data that correspond with the original field and lab data.

18.4 Annual leachate treatment and management report

The permittee must prepare an annual summary report for the leachate treatment and management program and submit the report to DEQ prior to Feb. 15 of each calendar year. This annual report may be included as part of report submission.

Note: Whenever possible submit two-sided copies of all reports.

18.5 Annual leachate treatment and management report contents

This annual report must include the elements presented in the most recently approved Environmental Monitoring Plan.

Reference: The report format should reflect DEQ's guidance: *Solid Waste Landfill Guidance*, September 1996.

18.6 Split sampling submittal

Within 90 days of any split sampling event, the permittee must submit the following information to DEQ's laboratory:

- A copy of all information pertinent to the sample collection handling, transport and storage, including field notes
- Copies of all laboratory analytical reports
- Copies of all laboratory QA/QC reports
- A copy of the lab certification (ORLAP or NVLAP, see certified environmental lab data condition above)
- A hydrogeologic map of the site showing groundwater flow directions and water table contours
- Any other data or reports requested by DEQ

18.7 Lab address

Report all required split sampling information to:

Oregon Department of Environmental Quality
Laboratory, Groundwater Monitoring Section
7202 NE Evergreen Parkway, Suite 150
Hillsboro, OR 97124
Phone: 503-693-5700
Fax: 503-693-4999

18.8 DEQ response to split samples

If the permittee submits all required split sampling data and requests the DEQ's results, DEQ's lab may provide, to the permittee, copies of the following information:

- DEQ's analysis of the split sample
- The quality assurance/quality control report
- The analytical report
- The field data sheets

19 Environmental Monitoring Network

19.1 Monitoring device installation

DEQ may require the permittee to install additional groundwater monitoring wells, or other monitoring devices as necessary to characterize adverse changes in water quality detected in the existing monitoring network or to further characterize the environment in the event the permittee proposes substantial changes to the landfill design or expansion of the landfill footprint.

19.2 Monitoring stations and equipment

To ensure that every sample is representative of the site's environmental conditions, the permittee must protect, operate, and maintain all environmental monitoring stations and equipment in accordance with the DEQ's requirements.

19.3 Access to monitoring stations and equipment

To facilitate sample collection and/or inspection and maintenance activities, the permittee must maintain reasonable all-weather access to all monitoring stations and associated equipment.

19.4 Reporting equipment damage

Within 14 days of discovering any damaged monitoring equipment or station, the permittee must submit to DEQ a report describing the damage, the proposed repair or replacement measures, and the schedule to complete this work.

Example: a well's impaired function or altered position/location.

19.5 Monitoring well construction

The permittee must complete any monitoring well abandonment (decommissioning), replacement, repair or installation in a manner that complies with the Water Resources Rules, OAR 690-240.

19.6 Reporting well construction and repairs

The permittee must document all monitoring well construction activities, including well repairs of significance, driller's logs, well location information, and construction information in a report prepared and stamped by a geologist or certified engineering geologist, with current Oregon registration. The permittee must submit the report to DEQ within 30 days of the action and include this documentation in the next Annual Environmental Monitoring Report.

19.7 Well decommissioning or replacement

The permittee must inform and receive DEQ approval prior to decommissioning or replacing any well in the monitoring network. The permittee must decommission or replace any well meeting one of the following criteria:

- The well was installed in a borehole with a screen that hydraulically intersects two saturated strata
- The permittee lacks supporting documentation demonstrating that the well was properly installed and constructed
- The well was damaged beyond repair or destroyed
- Other reason(s) as determined by either the permittee or DEQ

Please note that decommissioning or replacing a well must be done in accordance with Oregon Water Resources Department rules and requirements.

COMPLIANCE SCHEDULE**20 Summary of Due Dates****20.1 Summary**

The permittee must comply with the compliance schedule summarized below. Individual permit sections provide more details about each requirement.

Due Date	Activity	See section...
IMMEDIATE:		
Immediately upon learning of spill incident at a reportable quantity	Notify OERS about reportable spill	9.2 Spills notification
SHORT-TERM:		
Within 48 hours of discovering hazardous or suspected hazardous waste	Notify DEQ, initiate procedures to identify and remove the hazardous waste	6.1 Hazardous waste disposal
Within 90 days after discovering hazardous or suspected hazardous waste	Remove hazardous waste	6.1 Hazardous waste disposal

Within 24 hours of identifying a permit violation	Take corrective action for permit condition violation and notify DEQ	8.1 Non-compliance reporting
Within 48 hours of discovering prohibited waste	Notify DEQ of prohibited waste, begin to isolate and remove, take digital photos	9.1 Discovery of prohibited waste
Within 90 days after discovering prohibited waste	Transport prohibited waste to a disposal site authorized to accept such waste, unless otherwise approved or restricted by DEQ	9.1 Discovery of prohibited waste
Within 60 days after discovering storm water drainage structure damage/malfunction	Notify DEQ and complete repairs	9.7 Storm water drainage structures
Within 10 days of receipt of lab results and resampling results with exceedance(s)	Follow DEQ approved EMP and notify DEQ of monitoring exceedance(s)	14.1 Environmental Monitoring Plan submittal and implementation April 8, 2013 DEQ-approved Environmental Monitoring Report and any DEQ-approved updates 15.4 Monitoring after Environmental Monitoring Plan approval 17.2 Review of results 17.3 Resampling results
Within 30 days after confirming a significant change in water quality results	Follow DEQ approved EMP and submit assessment plan to DEQ	14.1 Environmental Monitoring Plan submittal and implementation April 8, 2013 DEQ-approved Environmental Monitoring Report and any DEQ-approved updates 15.4 Monitoring after Environmental Monitoring Plan approval 17.4 Resampling results
Within 90 days of resampling date	Submit Remedial Investigation (RI) workplan to DEQ	14.1 Environmental Monitoring Plan submittal and implementation April 8, 2013 DEQ-approved Environmental Monitoring Report and any DEQ-approved updates 15.4 Monitoring after Environmental Monitoring Plan approval 17.3 Review of results, 17.4 Resampling results
Within 14 days of discovering damage to monitoring equipment or station	Submit report to DEQ	19.4 Reporting equipment damage
RECURRENT:		
By March 31 of each year	Submit Solid Waste Disposal Report/Fee Calculation Form to DEQ	8.4 Procedure, Step 3
By April 30 for each year	Submit annual financial assurance recertification report and, if applicable, updated mechanism	12.2 Recertification of financial assurance

By April 1 for each year	Submit an Annual Environmental Monitoring Report	18.1 Annual Environmental Monitoring Report
By February 15 for each year	Submit an Annual Leachate Treatment Report	18.4 Annual leachate treatment and management report
SAMPLING:		
At least 10 working days prior to scheduled sampling event	Notify DEQ	15.1 Notification of sampling events
At least 45 days prior to split sampling event	Schedule split sampling event with DEQ laboratory	15.2 Split sampling events
Within 90 days of split sampling event	Submit required data/documents to Department laboratory	18.7 Split sampling submittal
EVENT RELATED:		
At least six months before any new disposal unit	Submit engineering design plans	10.3 Design plans
Within 18 months of plan approval	Begin construction	10.4 Construction requirements
Within 90 days after completing any major construction	Submit Construction Certification Report	10.7 Construction report submittal
At least six months before any new closure construction	Submit engineering plans, specifications and a closure schedule	11.4 Closure plan approval
Per DEQ approved schedule,	Install DEQ required groundwater monitoring well or other required monitoring device	19.1 Monitoring device installation
Within 30 days after any well construction	Submit well construction report	19.6 Reporting well construction and repairs
SELDOM:		
At least 10 days in advance of ownership or operator change	Notify DEQ	4.6 Changes in ownership or address
Five years prior to closure	Submit closure permit application	11.3 Closure permit
Within 30 days of final site closure	Record notice in the county real property records	11.9 Deed record

ATTACHMENTS

21 Attachment 1: Parameter groups

21.1 Overview

This attachment describes the environmental-monitoring parameter groups and associated requirements. Due to the duration of this permit, suggested analytical methods may change. If that is the case, use the most currently promulgated Environmental Protection Agency method or DEQ-approved equivalent.

Note: Method means EPA SW 846 Methods [suggested methods are in square brackets].

21.2 Group 1a: Field indicators

The **field indicators parameter group** includes the following parameters:

- Elevation of water level
- pH
- Dissolved Oxygen
- Specific conductance
- Temperature
- Eh

With instruments calibrated to relevant standards, measure these parameters in the field when collecting samples. Acceptable methods include:

- Down-hole in situ
- In a flow-through well
- Immediately following sample recovery

21.3 Group 1b: Leachate indicators

The **laboratory indicators parameter group** includes the following parameters:

- Hardness (as CaCO₃)
- Total Alkalinity (as CaCO₃)
- Total Organic Carbon (TOC)
- pH (lab)
- Specific Conductance (lab) [Method 9050]
- Total Dissolved Solids (TDS)
- Total Suspended Solids (TSS)*
- Chemical Oxygen Demand (COD)
- Tannin/Lignin

Proper techniques for sample handling, preservation, and analysis are specific to each individual analyte: Follow appropriate EPA techniques or the most recent version of the Standard Methods for the Examination of Waste and Wastewater, published by the American Public Health Association, American Water Works Association, and Water Environment Federation.

*Note these special considerations for **total suspended solids**:

If the TSS concentration is...	...then analyze for:
Less than or equal to 100.0 mg/L in the sample	Total concentrations (unfiltered)
Greater than 100.0 mg/L in the sample	Both total (unfiltered) and dissolved (field-filtered)
Field-preserve samples according to standard DEQ and/or EPA guidelines and analyze by EPA Method 6010C or DEQ-approved equivalent.	

21.1 Group 2a: Common anions and cations

The common anions and cations parameter group includes the following parameters:

- Calcium (Ca)
- Sulfate (SO₄)
- Ammonia (NH₃)
- Sodium (Na)
- Nitrate (NO₃)
- Silica (SiO₂)
- Iron (Fe)
- Fluoride (F)
- Manganese (Mn)
- Magnesium (Mg)
- Chloride (Cl)
- Carbonate (CO₃)
- Potassium (K)
- Bicarbonate (HCO₃)
- Ammonium (NH₄)

Dissolved concentrations must be measured. Field-filter and field-preserve samples according to standard DEQ and/or Environmental Protection Agency guidelines and analyze by appropriate EPA techniques or the most recent version of the Standard Methods for the Examination of Waste and Wastewater, published by the American Public Health Association, American Water Works Association, and Water Environment Federation. Report results in mg/L and meq/L.

21.2 Group 2b: Trace Metals

The trace metals parameter group includes the following parameters:

- Antimony (Sb)
- Arsenic (As)
- Barium (Ba)
- Beryllium (Be)
- Cadmium (Cd)
- Chromium (Cr)
- Cobalt (Co)
- Copper (Cu)
- Lead (Pb)
- Nickel (Ni)
- Selenium (Se)
- Silver (Ag)
- Thallium (Tl)
- Vanadium (V)
- Zinc (Zn)

21.3 Group 3: Volatile organic constituents

Analyze for all compounds detectable by EPA Method 8260B (C- other method 8/06) or EPA Method 524.2, include a library search to identify any unknown compounds present. The volatile-organic-compounds parameter group is equivalent to the EPA Method 8260B list.

DEQ must pre-approve alternative methods like EPA Method 8021B.

21.4 Group 4: Assessment monitoring

The assessment monitoring parameter group includes the following parameters:

- Semi-volatile organic constituents, including phenols, EPA Method 8270D
- Mercury, EPA Method 7470A
- Cyanide, EPA Method 9010C (manual distillation) or 9012B (automated distillation)
- Nitrite

All Method 8270D analyses must include a library search to identify any unknown compounds present.

21.5 Group 5: Surface water and leachate

The surface water parameter group includes the following parameters:

- Total kjeldahl nitrogen (TKN)
- Total phosphorus (P)
- Orthophosphate (PO₄)
- Biological oxygen demand (BOD)
- Total halogenated organics (TOX) [EPA Method 9020B]
- Total coliform bacteria [EPA Method 9131]
- Fecal coliform bacteria [EPA Method 9131]
- E. Coli

21.6 Group 6: Other assessment parameters

Additional assessment parameters include the following:

- Dioxins and furans [EPA Methods 8280B and/or 8290A]
- Phenolics [EPA Methods 9065, 9066, and 9067]
- PCBs [EPA Methods 8082A and 8270D]
- Pesticides, herbicides and fungicides [EPA Methods 8081B, 8141B, 8151A, 8270D]

22 Attachment 2: Permit-Specific Concentration Limits, Action Limits, and Site Specific Limits

Permit-specific concentration limits, concentration limit variances, action limits and site specific limits have been established as follows:

Site Specific Limits have been established for the parameters and monitoring points as shown in the table below. Changes to these limits may be requested through the processes outlined in section 16 of this Permit at any time or as requested by DEQ.

Analyte	Units	MW-1	MW-2	MW-4	MW-5	MW-6
Chloride	mg/L	40.48	3.39	9.48	8.8	13.98
Potassium	mg/L	1.2	1.3	0.95	0.75	0.49
Sodium	mg/L	48.17	22.3	22.89	33.13	13.46
Specific Conductance	µs/cm	635.78	353.19	328.19	346.93	296.41
Sulfate	mg/L	29.85	44.06	19.51	26.85	41.04

Note: mg/L = milligrams per Liter; µs/cm = microsiemens per centimeter



Evaluation and Overview

RFP-Riddle Industrial Disposal Site – SW Permit 1386

Oregon Department of Environmental Quality
Western Region - Eugene Office
165 E. Seventh Avenue, Suite 100
Eugene, OR 97401

Contact: David Esch, 541-776-6148, esch.david@deq.state.or.us

Proposed Permit

The Department of Environmental Quality proposes to renew a solid waste landfill permit for the Riddle Industrial Disposal Site, owned and operated by Roseburg Forest Products Company. The facility is an open industrial solid waste landfill. The current DEQ solid waste permit for this facility was issued on July 20, 2009 and expires on June 30, 2019.

Permit Writer

David Esch
Western Region – Medford Office
541-776-6148
esch.david@deq.state.or.us

Permit Category

Solid waste disposal site –Industrial Disposal Site Permit

Activities Covered Under this Permit

The proposed Solid Waste Disposal Site Permit for the Riddle Industrial Landfill will cover approximately a 10 year period from the date the permit is issued. Conditions included in the proposed permit are summarized as follows:

The Permit Administration Section describes:

- The parameters surrounding the issuance of the permit;
- Disclaimer information for the Department;
- Department authority; and
- Information about modification of the permit.

The Operations and Design Section describes:

- Operations Plan and Special Waste Management Plan;
- Recordkeeping and Reporting; and
- Site Development, Design and Construction;

The Site Closure Section describes:

- The activities the permit authorizes and prohibits;
- Closure construction and maintenance requirements;
- Facility Management requirements;
- Financial Assurance requirements.

The Environmental Monitoring Section describes:

- The Environmental Monitoring Plan (EMP);
- Sampling requirements;
- Monitoring Standards;
- Recordkeeping and reporting; and
- The Environmental Monitoring Network

The Compliance Schedule includes:

- The summary of due dates.

The Attachments describe:

- Monitoring Parameter Groups; and
- Permit-specific concentration limits and action limits.

Facility Location

The Riddle Industrial Landfill is located on Riddle Bypass Road. The facility straddles the road with the landfill being on the north side and the leachate lagoons being to the south. The landfill is sited within Section 23, Township 30 South, Range 6 West, W. M. The approximate center of the site is at latitude North 42° 57' 6", longitude West 123° 22' 29".

Coverage and Eligibility

The permit is effective on the date it is signed by DEQ and is proposed to expire on May 31, 2029. The permit is issued in accordance with the provisions of Oregon Revised Statute Chapter 459; Oregon Administrative Rules 340, Divisions 90, 93, 95, 96 and 97; and a Land Use Compatibility Statement was filed by Douglas County on Oct. 2, 2008. This type of permit is issued for facilities where activities involve similar operations, waste and monitoring conditions.

Introduction: What is DEQ Proposing?

DEQ is proposing to renew a solid waste disposal site permit for the landfill. The permit renewal application was received on Dec. 3, 2018, and DEQ determined that the application was complete. The permit for the landfill expires on June 30, 2019. The Riddle Industrial Landfill began operations in 2009 and has been a permitted facility since.

FACILITY OPERATION DESCRIPTION:

The site and facility are both owned and operated by RFP. The site is located adjacent to the RFP Riddle Plywood Plant south-west of Riddle. The site accepts and disposes fly-ash generated from air quality control devices (for example electrostatic precipitators) only from RFP owned facilities. The site is engineered to accommodate the ash generated for 40+ years. Landfill construction includes a composite liner system above and below the deposited waste. Leachate collection and storage systems have also been engineered into the design. Leachate is collected during winter months and evaporated during summer months. Evaporation is expedited via controlled irrigation of leachate on a portion of the nearby plywood plant log deck. In addition to the Solid Waste Disposal Site Permit, a 1200Z storm water permit is required.

ENVIRONMENTAL AND PUBLIC HEALTH CONCERNS:

Careful engineering and operational techniques are used to ensure mists generated from the irrigation process do not migrate off-site. Containment and management of leachate has been successful in

protecting the environment and nearby receptors. Maintaining appropriate moisture content of the ash during transport and disposal have safeguarded against fugitive releases. Groundwater monitoring has been ongoing since before initial waste placement in the landfill. There have been no noted changes in groundwater chemistry to date.

Permit Compliance History

The last landfill inspection was conducted on April 29, 2019. One compliance issue was noted at this facility during the current 10-year permit period. A Warning Letter was issued by DEQ in August of 2012 due to a July 25, 2012 partial buffer zone infraction occurred when landfill leachate was inadvertently sprayed on the log deck adjacent to “R” Street. The violation was immediately corrected.

Roseburg Forest Products Company maintains continuous and appropriate Financial Assurance to support the post-closure activities anticipated at the site.

Regulatory Context

[Oregon Revised Statutes Chapter 459](#) requires a DEQ permit for any solid waste disposal site. OAR Chapter 340 Divisions 93-97 provides further clarification of requirements for permitted facilities.

DEQ’S Recommendation Regarding the Permit Renewal

I recommend that we put the draft permit out for public notice and comment.