

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Permits, Region 8

6274 East Avon-Lima Road, Avon, NY 14414-9516

P: (585) 226-5400 | F: (585) 226-2830

www.dec.ny.gov

March 3, 2020

Mr. Dale Irwin
Lockwood Hills, L.L.C.
590 Plant Road, PO 187
Dresden, NY 14441

Re: **Lockwood Ash Disposal Landfill**
Notice of Incomplete Application
DEC ID #8-5736-00005/00001, SPDES Renewal
DEC ID # 8-5736-00005/00005, Part 360 Series Renewal
SPDES NY 0101069
Torrey (T), Yates (C)

Dear Mr. Irwin:

Department staff met to discuss the status of the facility renewals and has determined that a Notice of Incomplete Application is necessary prior to proceeding on these permits. Please submit the following information:

SPDES Renewal:

- The Leachate Management Plan does not elaborate on how reduced infiltration on the exposed geomembrane cover (EGC) will be handled as stormwater runoff. The report acknowledges that perimeter drainage will need to be evaluated as well as the capacity of the two sediment basins on the East side of the landfill. When will this evaluation be conducted? Will the sediment basins need to be cleaned out initially to determine their capacity or is their capacity known?
- Aside from the perimeter drainage channels and the two sediment ponds, where would stormwater be directed to if there was not adequate capacity in these ponds? Will Lockwood Hills be adding any new stormwater outfalls that should be covered under the SPDES permit?
- How will dredged sediment from Sediment Basins 1&2 be managed taking into consideration the difficulties with disposing the dredged pond sediment from the settling pond? Will they be disposed of in the landfill?

- The Leachate Management Plan states that “the stormwater management system that covers the entire Landfill is isolated from the waste materials and designed to reduce infiltration, control erosion, and convey stormwater runoff that has not come in contact with any waste materials to Lockwood’s two onsite stormwater basins.” The Department will need a figure of what these structures look like now and how the stormwater management system will look during the phased EGC installation and finally once the EGC is installed.

Part 360 Series Renewal:

- Please describe how the Leachate Management Plan is consistent with the intention to operate an active landfill as described in the permit application? For instance, additional details are needed to explain how the EGC installation will affect the proposed fill progression plan, proposed permitted capacity, construction of future cells, and placement of final cover. Clarification is needed regarding how the EGC placement will proceed in the absence of significant amounts of additional waste being landfilled given that the Department is not aware of any existing sources.
- The Department requires that a gas generation study be performed before EGC installation design is complete. The installation of the EGC will substantially limit the migration of any gas currently produced by the waste mass and the gas may cause uplift force on the EGC that needs to be designed for. Under complete coverage by the EGC, the gas will either accumulate within the waste mass or migrate out of the site through structures or improperly lined sections of the landfill. This should include the gas generation rate and composition. Following the gas study, a gas collection and control system may be required along with the final design of the EGC (Part 363-9.2(2) & 363-9.5).¹
- Please provide the design capacity for the landfill for both filled and future air space in cubic yards and tons.
- The Department cautions that the use of weighted ballast on a GCL such as sandbags requires substantial maintenance to keep aligned properly and remain effective. As such, other methods of ballasting are preferred.

¹ <https://pdfs.semanticscholar.org/518b/bd08ddaa32ce1df0197b059cc6ef2b5406e8.pdf>

- Please be aware that the Department cannot offer any support regarding possible acceptability of a variance application to consider the proposed EGC system an element of final closure without meeting the final cover requirements at Part 363-6.16.

This information is being requested by May 4, 2020. It will be used to determine the next steps in the process; for example, whether we will require an NY-2C SPDES application form completed or not. If you wish to discuss this letter prior to sending in the information, I can set up a discussion by call or meeting. Please let me know. I'm available at 585-226-5392.

Sincerely,



Kimberly A. Merchant
Deputy Permit Administrator

encl.

Ecc: Dennis Harkawik, Regional Attorney, OGC, DEC Region 8
Bernette Shilling, RE, DEC Region 8
Greg MacLean, Regional DMM Engineer, DEC Region 8
Yasmin Guevara, DMM DEC Region 8
Dan Maeso, DMM DEC Region 8
Jonathan Tamargo, Division of Water, DEC Region 8
David Pratt, Remediation Engineer, DEC Region 8
Thomas Haley, RPA, DMM, DEC Region 8
Don Canastrari, Division of Water, Central Office DEC
James Daigler, Daigler Engineering, PC
Theresa Diehsner, DEP, CO, NYSDEC
Yuan Zeng, DAR, DEC Region 8
Michele Kharroubi, DAR, DEC Region 8

