

**SOLID WASTE
COMPLIANCE AND ENFORCEMENT
SMALL ARID AND CONSTRUCTION
AND DEMOLITION LANDFILLS
2014**



Our Mission: To protect and improve the health and environment of all Kansans.

OVERVIEW

- Solvent Contaminated Wipes Rule
- Preventing Violations
- Changes to KDHE's Compliance Procedures
- Questions

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Solvent Contaminated Wipes Rule

- A new Hazardous Waste rule implemented in Kansas January 31, 2014.
- Allows disposable solvent contaminated wipes to be taken to Municipal Solid Waste Landfills that have a synthetic liner.
- These wipes **cannot** be taken to Small Arid Landfills or to Construction/Demolition Landfills.

Solvent Contaminated Wipes Rule

- Wipes will come in any type of closed containers.
- Container will be labeled “Excluded Solvent Contaminated Wipes”
- If free liquids exist in the containers when accepted at the landfill, the landfill must remove the free liquids and manage them as hazardous waste.

Solvent Contaminated Wipes Rule

- Special Waste Disposal Authorizations are not required for these solvent contaminated wipes.

Questions on Solvent Contaminated Wipes?

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PREVENTION OF VIOLATIONS

- Maintain good communication between landfill operator, landfill management permitting staff (engineers), and KDHE permitting staff
 - Don't change operations, until after receiving written KDHE approval of revised permit documents (Facility Operations Plan, Design Plans, etc.)
 - If the operations don't match the permit documents now, follow the permit documents and submit the desired changes to KDHE for approval.
 - Contact KDHE whenever an emergency or unusual event causes a deviation from permit documents.

PREVENTION OF VIOLATIONS

- Maintain a small working face (Should only be large enough to safely work for that days incoming loads)
 - Saves on cover material
 - Reduces vectors
 - Helps prevent litter issues
 - Reduces amount of leachate generated

SMALL WORKING FACE



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SMALL WORKING FACE



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SMALL WORKING FACE



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PREVENTION OF VIOLATIONS

–SALs should apply good cover

- Daily Cover
- Intermediate Cover
- Final Cover

–Or for CDLs,

- Cover

PREVENTION OF VIOLATIONS

- SALs should apply good cover
 - Daily Cover reduces:
 - Odors
 - Vectors
 - Litter
 - Can use alternative daily covers if approved in your operating plan

PREVENTION OF VIOLATIONS

–CDLs should apply cover:

- At least every 2,000 tons of waste disposed or 120 days (whichever is reached first)
- Shall consist of a minimum one foot of soil:
 - Reduce fire risk
 - Control litter
 - Limit vector harborage

Inadequate Alternative Daily Cover (Top Coat Spray)



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ACCEPTABLE DAILY COVER



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PREVENTION OF VIOLATIONS

–Intermediate Cover for SALs

- Applied to any area that has not received waste for 60 days.
- Graded to facilitate drainage or runoff
- Must be maintained

Inadequate Intermediate Cover



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Intermediate Cover, erosion



Our vision is 'healthy Kansans living in safe and sustainable environments'. The state belongs to all of us - "Kansas Don't Spoil It"

Good Intermediate Cover



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PREVENTION OF VIOLATIONS



– This is Kansas, anticipate severe weather events:

- Employ extra measures (screens, fences, etc)
- Use rock in drainage areas
- Terrace steep and long slopes

PREVENTION OF VIOLATIONS



- Utilize alternative working areas in high winds or wet weather conditions.
 - Ensure that alternate working faces are approved in your design and operating plans
 - Lower or well screened areas work well in high winds to reduce litter
 - A smaller, more accessible area works well in wet weather

PREVENTION OF VIOLATIONS

- Maintain a clear distinction between storm water and leachate.
- Maintain stormwater structures (ditches, ponds, berms, culverts, etc.)

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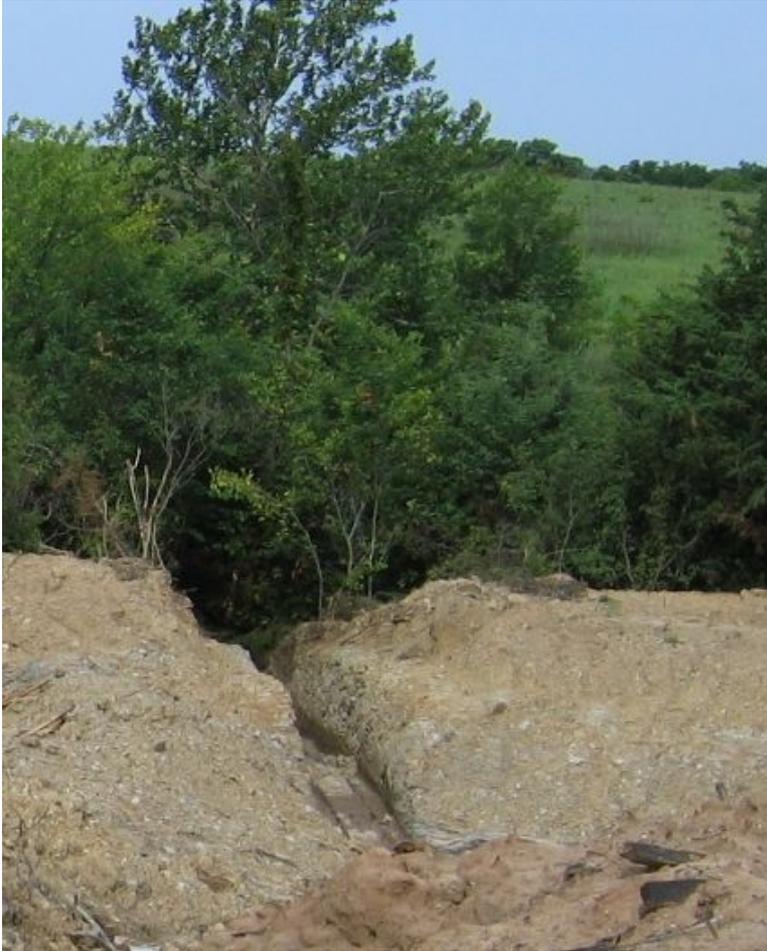
Good run-off control



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Breached Berm



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CHANGES TO KDHE'S COMPLIANCE PROCEDURES

- Currently KDHE cites violations for areas of non-compliance and makes written comments for areas where minor improvements are needed or where minor deviations from the regulations occur
- New Compliance Procedures will be implemented January 1, 2015

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CHANGES TO KDHE'S COMPLIANCE PROCEDURES

- New Procedures will include:
 - Violations
 - Deficiencies
 - Comments

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CHANGES TO KDHE'S COMPLIANCE PROCEDURES

–Violations

- No changes to how violations are cited
- Still recorded in database and available to the public
- Still considered in future enforcement (if applicable)
- Must be corrected

CHANGES TO KDHE'S COMPLIANCE PROCEDURES

–Deficiencies

- Not as serious as violations
- Not recorded in database, but still available to the public through records (part of the inspection report)

CHANGES TO KDHE'S COMPLIANCE PROCEDURES

–Deficiencies (Continued)

- Must be corrected or addressed
- If not corrected or addressed a deficiency may be elevated to a violation
- If repeated on future inspections, may be considered violations the second time
- Inspector will have full discretion to determine if something is a deficiency or a violation.

CHANGES TO KDHE'S COMPLIANCE PROCEDURES

–Comments

- Issues that are not serious enough to be violations or deficiencies will be written as comments.
- Not all comments will have to be addressed, but some will
- Comments will not be elevated to deficiencies or violations, unless the situation worsens or is not addressed if required

CHANGES TO KDHE'S COMPLIANCE PROCEDURES

- What will be considered deficiencies rather than violations?
 - Excellent question!
 - Examples:
 - Erosion in intermediate cover two situations:
 - Erosion is 18 inches deep, but no waste is exposed – If this has not been a comment or violation in the past and is a new situation, then it may be cited as a deficiency.
 - Erosion is 12 inches deep, but waste is exposed – This will be cited as a violation because storm water will be compromised.

CHANGES TO KDHE'S COMPLIANCE PROCEDURES

– More examples:

- Daily cover

- Soil was applied adequately through most of the active cell, but a 12' x 12' area was missed and no cover was applied, the active cell was 100' x 200' that day. This could be cited as a deficiency if it did not lead to other violations (litter, odor, etc.) and has not been a problem in the past. The area missed is small in comparison to overall area of the active cell.
- Soil was applied adequately through the active cell, but a 12' x 12' area was missed and no cover was applied there. The active cell was 20' x 15' that day. This would be cited as a violation as it is the majority of the active cell where no cover was applied.

CONTACT INFORMATION

- BWM web site:
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Questions



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