Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.

Alternative Daily Cover/Mississippi County Class I Landfill: Request to Use dried Drop Box Steel Sludge



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Mississippi County, Arkansas, submitted a March 2nd request to the Arkansas Department of Energy and Environment – Division of Environmental Quality ("DEQ") to continue the use of dried Drop Box sludge ("Sludge") from the Nucor – Yamato steel mill as an alternative daily cover ("ADC").

The Sludge would be used as ADC at the Mississippi County Class I Landfill ("MCCL").

ADC is sometimes described as cover material other than earthen material placed on the surface of the active face of a solid waste landfill at the end of each operating day to control vectors, fire, odors, blowing litter, and scavenging.

Arkansas Pollution Control & Ecology Rule No. 22 (Solid Waste Management Rules) sets forth the requirement of an ADC that is utilized.

Reg. 22.413(b) states:

Alternative Cover Materials – Alternative cover materials of an alternative thickness (other than at least six inches of earthen material) may be approved by the Director either through an individual request or through generalized Department approval upon demonstration that the alternative material and thickness controls disease vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment.

Materials approved as ADC can differ from state to state based on regulations and policies. However, examples can include:

- Shredded tires
- Green waste or compost
- Foam products
- Fabric panels
- Construction waste
- Automobile shredder residue
- Geosynthetic covers
- Hydro-mulching or spray on
- Sludge
- Cement kiln dust
- Contaminated sediment
- Demolition waste
- Bark and chipped wood

Benefits of appropriate ADC are often identified as:

- Increase of landfill capacity
- Odor control
- Fire prevention
- Scavenger and disease transmission control
- Cost savings
- Decreased increases of onsite soils

 $\label{eq:definition} A \ number \ of \ Arkansas \ land fills \ have \ obtained \ DEQ \ permission \ to \ use \ certain \ materials \ as \ ADC.$

The MCCL request for its continued use of Sludge cited several benefits which include:

- Increased utilization of airspace
- Decreased usage of onsite soils
- Increased flow-through of leachate to the collection system
- Reduction in side-slope seeps due to reduced usage of impermeable soil

A copy of the MCCL request can be downloaded <u>here</u>.