

ATTENDEE COMMENTS AND QUESTIONS
Poster Notes from August 25, 2008, Meeting - DRAFT
Construction, Demolition and Industrial Landfill Work Group
9:00 am - 3:00 pm, Training Room 2, MPCA, St. Paul

(Note: responses to members' questions are in parentheses)

Questions and comments during Neal Wilson's
Powerpoints on use of hydrogeology information for
landfill permitting; on groundwater monitoring; and on
composition of CDI waste

What does "conservative" mean when referring to IWEM and assumptions?

Class 1, 2 and 3 - explain for demo LF guidance (will be explained in following Powerpoint)

Conclusions in Mike Trojan study from 2003 - what meaning do we draw from that? We would like to know the hydrogeologic settings of the demo landfills he studied well data from. Where did the reported VOCs come from? (Should have Mike Trojan present to group)

Comment - The reference to 1980s Hazardous Waste Landfill siting - that was a political problem, not geology, there was a lot of local opposition at all sites

Deep clay possible landfill sites studies in 1980s mentioned were NW Minn not NE

Comment: Re decline in number of MMSW landfills - the last new MMSW LF was St. Louis County Regional LF - early 90s. Same trend with WTE, haven't seen new ones for 15+ years. Have seen new demo landfills since then, though

Comment: MSW combustor ash rules are separate from other rules, though there are some cross references. The liners and cap language is different. Siting is the same as for MSW LFs.

Comment: Liner standards - note that industrial LFs have different options as to construction, and some are close to liner standards for Subtitle C LFs

Class II liner matrix - see Neal's Powerpoint slide summarizing guidance document - explain phrase "risk not fully validated" - what does that mean? (was a group process)

Demo debris haulers are not licensed by counties like MSW haulers. They are harder to regulate than MSW haulers. Getting acceptable waste into Demo LFs really depends on checking the working face. Note that demo LFs are subsidized by counties and they are small, so they don't have economies of scale like the big Metro demo LFs. We have these demo LFs because the MPCA wanted the counties to move away from PBRs to permitted landfills.

Also counties want to centralize the demolition landfills in fewer places, so they are easier to monitor and respond to if needed. It's better to have a few demo LFs than 50.

Of the industrial landfills, how many liners are built to MSW LF standards? (engineers will be presenting on that next mtg)

Sand has little effect on attenuating contaminants, whether it is five feet thick or ten feet. How the model is designed is key. Why are we presuming some contaminants will stick if they leave an unlined landfill? We need MN specific information on contaminants from MN demolition waste. The point is that sand won't clean up leachate

The concern by counties is the abandonment of the demo LF by owners. The tradeoff is that in remote areas you can't do all you'd like to do.

IWEM - what leachate data is being used? Unlined LFs don't provide that data. Are you using the data from the lined demo LFs, which take other wastes besides demo? Might want to look at data from SKB's class II - even though allowed to take industrial waste under ISWMP it hasn't done so (might want to have MPCA's Brett Ballavance in for a tech presentation to describe IWEM and data inputs)

Questions and comments during Roger Clarke's Powerpoint on coal ash composition

What effect on coal ash chemistry would there be if we sequestered carbon? (Can't say - would depend on specific process)

Where are the fuels coming from - (some from western sources, some is petcoke from Koch)

What does "lost on ignition" mean (factor showing unburned carbon left in ash)

Comment from other facility: important to keep in mind this material is highly alkaline, which reduces mobility of contaminants. We commonly meet secondary drinking standards which means you could drink it without harm but it would have a smell or taste. Contaminants would be more mobile if mixed with MSW organics.

What is the pH (6.7 - 8.0)

Beneficial use of coal ash? (includes soil stabilizer, most common is cement additive)

Usability of coal as cement additive after 2010? (plants with scrubber already are not usable for cement, except as whitener. Ash with sorbents will have more mercury but chemistry keeps mercury from being mobile)

Which plants now have coal suitable for cement additives (only those without scrubbers, which is a diminishing population. AS King has option of using some of its ash, but depends on LOI)

Comment to staff: Please put powerpoints on the CDI LF website (will have website working and do a report on that at next mtg)

How transportable is coal ash - doesn't it set up? (if moistened it reacts like cement and sets up, and turns out heat)

Questions and comments during Bob Tipping's Powerpoint

Comment on Kalmar LF - sited in late 80s - that was sited on a "green" or protective area indicated on Olmsted County map. That was key to siting process.

Polk County map - where did data come from (from well records and samples collected)

What is your confidence that the wells sampled are representative of the groundwater in the area (representative wells are used and data is as good as is available now.)

Questions and comments during Jan Falteisek's Powerpoint

Question on how rankings are arrived at in making index map (typically consensus of experts)

The most recent water, shown in pink - could that be to the influence of wells? (of the maps shown, probably not. There are cases of pumping centers that have drawn recent water deeper than under unstressed conditions, but in much of Minnesota pumping wells are not the reason why atlases show the vertical tritium profiles that they do.)

On recharge of water resources - do they ever recharge once pumped? (the slides shown aren't able to show the details, however aquifers in otherwise low permeability areas are replenished from limited sand stringers, unmappable connections between them, and the surrounding saturated till. The replenishment rate is slow, however.)

On format of maps, like Goodhue County - wouldn't it be better to have a map that also showed where old water underlies new water? The maps now just show the newer water on top (yes, could use multiple maps or layers to show that in atlas)

County atlas maps - who pays for that? (Counties pay part either in cash or in-kind services; local support generally only covers about 15% of the total cost. Most of the cost is supported by state funding through either general funding, University of Minnesota support for Minnesota Geological Survey operations, and some matching federal funding for geological mapping. The past few years, additional funding has been provided by the LCCMR. The number of atlases can be completed strictly depends on on future state funding)

Could an industrial permittee help pay for the cost of the county atlas map? (Olmsted County helped pay for the county atlas not as a county government but because it was a landfill operator and had to work out proper siting)

Need to merge the local zoning dataset with these maps - note that a lot of land isn't available for industrial landfills (atlas maps now are for a broad set of land use purposes and except for the older atlases are provided as GIS coverages that can be combined with other information using GIS technology)

Who regulates pumping centers (installation of wells is regulated by the MDH; large appropriations are permitted by the DNR. Depending on the size of the installation, other agencies may also be involved)

Question on Anoka sand plain (is more complicated than sand on bedrock; there are some confining layers in some locations at depth)

Questions and comments during Landfill Operator/MPCA Compliance panel on waste acceptance and screening

Is a sample available from the Kalmar LF, to tell us about leachate from demolition landfills not lined? (snapshot, probably not representative given unusual conditions)

Demolition pre-inspection is happening now at commercial jobs in our area, but residential demolitions can be 80% of jobs - need better options for that

Paperwork for inspections being done is not getting to the Gr Minn demo landfills on arrival of the loads - it would help for us to see the signed forms

If there is not a lot of processing need by us, of that paperwork we are happy to file it at the landfill office

Metro is a different factor - those landfills receive a lot of loads that has passed through a transfer station - how is the paperwork supposed to function in that case?

If we turn loads away coming from small contractors there is a greater likelihood of ditch disposal

Inspection forms should apply to residential work where an individual is doing his own demolition work - those can come in on five or six trailerloads.

If you want the pre-inspection job done right the building owner needs to be ultimately responsible. A demo contractor goes in and the owner says "it's all been removed" - owner responsibility would be better than shared responsibility

Metro factor - what is a Metro landfill going to do when a demolition job has ten or twelve truckloads coming in and the first trucks don't have the inspection paperwork?

That's not a problem with asbestos forms - was at first but they learned to have the paperwork in the truck

Maybe we should consider lining the landfills and taking more waste if acceptance is hard to enforce

Sheetrock? Sulfur compounds can show up in leachate

Empty paint and adhesive containers are not so much a problem as the residue. Take example of half empty containers - some VOCs are traceable to those. It's not coming from dry empty cans

There is an economic disincentive for businesses to participate in VSQG programs. The state should not make it hard to do the right thing - that sets the system up to fail

Example of workable plan is Dakota County which picks up improper wastes that the facility owner can't trace back to the person who left it in the load dumped.

Dakota county likes the idea of inspection at the face. We see "paper plans" on screening, but on-site inspection of the face is most effective. The state compliance staff can't be everywhere to keep the playing field level, and counties are short of staff to do this.

Safety factor - we don't want the landfill personnel coming across a container of asbestos waste

Need to consider balancing inspection on the face with the safety of landfill operators. The equipment is all big and on-ground inspection is a worry. Not a good idea to have him get out to pull pop cans from the demo face. We eliminated the traffic director on the waste for that reason

Demolition LFs are a stepchild compared to other landfills

Residents moving around landfills and transfer stations are a safety risk

Unlined demolition LFs should only accept demolition, not construction and demolition waste - our site takes in maybe five percent paper from building materials. Can't have a person at the demo fill every hour. Having a spotter is key while pushing the demo. Construction waste should go into MSW landfills. Treated wood needs to be separated at the job site, not at the landfill. Maybe 1 - 2% not caught but not going to be a problem. We find a little here and there because some residents have no idea what it is. Are used under garage eaves, etc. Also dumped in cleanouts. We have screening and a form they fill out, with their license number, before the waste goes into the demo fill. We are less worried on big demo contractors since they're trained by us

We are seeing a lot more treated wood lately, from decks docks and retaining walls. Pole barns can have CCA (wood treated with chromium, copper and arsenic compounds) around the lower portion.

New construction waste rolloffs need more attention by operators - eg carpet, CCA-treated wood

Burned buildings - good to separate burned parts for MSW disposal

How much of C&D would be reusable or recyclable if separated (Metro: ferrous, wood for mulch and bio-energy, asphalt from shingles, glassphalt, sandblast media. Carpet still tough to market)

One change is we don't see as much unused lumber and plywood sheets as used to; maybe because of tight economy there is time and incentive to separate it

After hail damage and roofing repair contractors come through, we see loads with rolls of tar paper and packs of unused shingles - reason for shingles is different colors and styles for each house - can't use shingles from one job at the next job

Comment by legislator as observer on background of WG statutory charge - don't put demo LF operators in untenable positions with uneconomic requirements; yes we do need ground water protection and fully monitored GW, and need effective inspection up front at demolition sites; we also want a level playing field so competitors don't take advantage of the good actors - don't want to penalize those doing things correctly; don't set up for illegal dumping because are so few LFs left

Lunch changes

Given that state budget is tighter, PCA can send out menu and give us the cost, \$5-10, and we will pay that or eat in cafeteria

Agenda Items Suggested for Upcoming Meetings

Leak detection - there is an ASTM test on checking integrity of LF liners - John McCain willing to present

Talk about scope by going through Manny C's outline or update of that, Sept 18

How about a talk by AG or Admin about difference between guidance and rule

Presentation by Mike Trojan on his 2003 report on data from groundwater monitoring near demo LF

Presentation on the 1998 MSW Landfill Liability Report

Progress report on website, go through that on screen

Presentation on illegal dumping - can we go beyond anecdotal reports to some connection between economics and behavior

Presentation about how hydrogeology and monitoring and site assessment works at specific sites in specific hydrogeologic settings

PCA to talk about expected lifetime of sites through 20-year postclosure period and what happens after that. Include info about number of years rem'g

EPA research on liner longevity a few years ago - have a report on that