

## Graczyk, Lisa

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**From:** Sylwia Scott <Sylwia.Scott@usecology.com>  
**Sent:** Tuesday, May 29, 2018 10:43 AM  
**To:** Graczyk, Lisa  
**Cc:** Blough, James; Greensley, Jean  
**Subject:** RE: Comments on renewal application for WDI TSCA Approval  
**Attachments:** 2018 Renewal - US Ecology Wayne Disposal - CPC Certificate.pdf; 0128\_001.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Lisa. See blue text below. Jim called me last week about a tie in detail. I am waiting for him to provide the specific drawing he was referring to. Once I have that CTI will be able to respond to his question as well as your offsetting question.

### Comments Specific to WDI Renewal Application dated March 29, 2018.

1. Attachment 1, Figure 1. The MCVI-G Phases on this figure are incorrect. See the engineering diagrams for the revised landfill liner for MCVI-G Phase 2. This should be corrected.

Are you referring to Attachment 1, Figure 2? If so, please disregard this figure. Sheet 2 in the engineering plans replaced this figure. Sheet 5 in the engineering plans details the individual cell phases of MC VI G and F.

2. Attachment 6, page 2. Steps 3 and 4 of the "Pump/Meter Function" appear to refer to either the wrong steps or steps that do not exist in the Leachate Monitoring and Sampling Plan. This should be corrected.

Attached is the revised page which was modified as follows:

3. Take meter reading from flowmeter and record on form.
4. If the meter has moved since the last reading then proceed with taking level measurements.
5. If meter does not move then:
  - a. Determine if it is likely that the pump intake above the leachate level in sump. This can be done by visual inspection (can you see the pump above the leachate), by sound (the pump makes a distinctive noise when trying to draw in air), or by measuring the leachate head elevation. If the leachate level is below the sump intake then the inspection is completed and the results should be noted on the form.
  - b. If the pump intake is below the leachate level then further investigation is necessary. Record the apparent malfunction on the inspection form and report results.
3. Attachment 7, Section 7.0, Data Evaluation. Why does the NSB have a different screening level and response action than the SSB and NWSB?

The NSB is located in what we refer to as "Area B". It collects run-off from cells that are in closure or interim closure and are remote from current and future operations. The screening levels are set to not allow any detection. At the time of closure this area will not need to be sampled because the monitoring programs

will demonstrate that PCBs are not detectable. The SSB and NWSB receive storm water run-off from “Area A.” This area is closest to the active operations. If we detect PCBs coming from “Area A” above the screening levels we must pursue corrective measures. If PCBs are detected below the screening levels we can either conduct corrective measures or wait until operations have ceased. Upon closure, “Area A” will be sampled and any detections will result soil removal and resampling until no PCBs are detected.

4. Attachment 9, Attachment F, Statistical Program for the LDCRS. Attachment F of Attachment 9 states that “If the concentration of total PCBs is shown to increase in the three consecutive samples it will reported as an apparent statistically significant increase and WDI will respond per the Operating License.” Please clarify that this is only for Cell VI-AN and that for other cells, a statistically significant increase of PCBs shall be any detection of PCBs above the detection limit. In addition, it is EPA’s understanding that Cell VI-AN is being sampled on a monthly basis. All PCB leak detection sampling results for Cell VI-AN, including monthly sampling results, should be sent to EPA.

Yes this is specific to AN due to its history.

#### Additional Questions

1. Can EPA get a copy of the updated insurance certificate for closure?

See attached.

2. Is WDI still filling in MCVI-E with waste material?

MC VI-E is has not met its final grade and has potential to receive waste. Our current filling activities are focused on G.

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**From:** Graczyk, Lisa [mailto:graczyk.lisa@epa.gov]

**Sent:** Wednesday, May 23, 2018 6:18 PM

**To:** Sylwia Scott <Sylwia.Scott@usecology.com>

**Cc:** Blough, James <Blough.James@epa.gov>; Greensley, Jean <greensley.jean@epa.gov>

**Subject:** Comments on renewal application for WDI TSCA Approval

Sylwia,

Please respond to the following comments regarding the Renewal Application.

#### Comments Specific to WDI Renewal Application dated March 29, 2018.

1. Attachment 1, Figure 1. The MCVI-G Phases on this figure are incorrect. See the engineering diagrams for the revised landfill liner for MCVI-G Phase 2. This should be corrected.
2. Attachment 6, page 2. Steps 3 and 4 of the “Pump/Meter Function” appear to refer to either the wrong steps or steps that do not exist in the Leachate Monitoring and Sampling Plan. This should be corrected.
3. Attachment 7, Section 7.0, Data Evaluation. Why does the NSB have a different screening level and response action than the SSB and NWSB?
4. Attachment 9, Attachment F, Statistical Program for the LDCRS. Attachment F of Attachment 9 states that “If the concentration of total PCBs is shown to increase in the three consecutive samples it will reported as an apparent statistically significant increase and WDI will respond per the Operating License.” Please clarify that this is only for Cell VI-AN and that for other cells, a statistically significant increase of PCBs shall be any detection of PCBs above the detection limit. In addition, it is EPA’s understanding that Cell VI-AN is being sampled on a monthly basis. All PCB leak detection sampling results for Cell VI-AN, including monthly sampling results, should be sent to EPA.

## Additional Questions

1. Can EPA get a copy of the updated insurance certificate for closure?
2. Is WDI still filling in MCVI-E with waste material?

Thank you.

Lisa

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The volume of leachate pumped out of each sump is recorded on a totalizing flow meter which is placed in line in the discharge line from the pump. Leachate is conveyed to the wastewater pretreatment plant on site.

### **3.0 LEACHATE LEVEL AND VOLUME MEASUREMENTS**

The keys to maintaining compliance with leachate level and volume record keeping requirements are frequency of inspection and maintenance of each system. To ensure proper performance of the leachate collection system, weekly inspections of the sump areas are conducted. Figure 2 is a checklist form for recording the results of this weekly inspection. The main components of this inspection are determining leachate levels in the sump, whether the pump/meter is operating correctly and the monthly volume of leachate. An outline of these procedures in the form of a flow chart is included on Figure 3. The procedures for the weekly inspection are as follows:

#### **PUMP/METER FUNCTION**

1. Turn pump on at the electrical panel
2. Listen for the sound of the pump turning on and check for meter advancement.
3. Take meter reading from flowmeter and record on form.
4. If the meter has moved since the last reading then proceed with taking level measurements.
5. If meter does not move then:
  - a. Determine if it is likely that the pump intake above the leachate level in sump. This can be done by visual inspection (can you see the pump above the leachate), by sound (the pump makes a distinctive noise when trying to draw in air), or by measuring the leachate head elevation. If the leachate level is below the sump intake then the inspection is completed and the results should be noted on the form.
  - b. If the pump intake is below the leachate level then further investigation is necessary. Record the apparent malfunction on the inspection form and report results.

#### **LEVEL MEASUREMENT**

- a. Measure the leachate level in sump from the top of the sump with an electronic water level sounding device.
- b. Compare the depth to leachate with the minimum allowable depth listed on Figure 2. Determine whether the level is in compliance.
- c. Record the result on the weekly inspection form.