

**SLAUGHTER & ASSOCIATES, PLLC**  
URBAN PLANNING CONSULTANTS  
P.O. Box 2401  
Oxford, MS 38655  
662.234.6970

Base Map  
**Proposed Annexation Area (Revised)**  
**City of Canton, Mississippi**

Sources:  
City of Canton, Mississippi  
Mississippi Automated Resource  
Information System (MARIS)  
US Census Bureau 2010 TIGER Line Files.  
Note: This map is accurate for planning purposes only.  
Date: May 3, 2011

1 justice issues in amending its plan.

2 Additionally, the Department considers the  
3 review by the county as only a preliminary  
4 review of environmental justice issues and not  
5 a final or indepth analysis of this issue. A  
6 more comprehensive independent analysis of  
7 environmental justice implications will be  
8 conducted by the Department in the  
9 environmental permitting process. The review  
10 by Madison County merely indicates to the  
11 Department that the local government did not  
12 find significant environmental justice issues  
13 when it sought to amend its plan.

14 Upon completion of the Department's review  
15 of the final documents submitted by the county,  
16 the Department concluded the information  
17 demonstrated that the county had followed the  
18 proper procedures, reviewed and considered the  
19 need for the project, as well as local land use  
20 and environmental justice issues.

21 On December 16, 2004, the Commission voted  
22 to approve the amendment to the Madison County  
23 Solid Waste Plan, and this was only an initial  
24 decision. As a condition of this initial  
25 approval, the Commission directed the

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Department to work with the permit board to consider requiring the prospective landfill permit applicant to initiate actions to collect litter along the roads leading to the landfill and to consider requiring a greater setback distance from the property line to the disposal area than what is required by state regulations.

The Department is going to call two witnesses today: Mark Williams who's been thoroughly involved in the review of this proposed amendment by Madison County and Gloria Tatum who was involved in one meeting with Gene Wardlaw, the consultant for Mr. Bilberry.

In conclusion, Madison County has been through a lengthy and extensive review of the proposed amendment of the proposed landfill dating back to 1998. There has been thorough consideration by the former board and the current board. According to the prefilled testimony, this matter has been discussed in board of supervisor meetings on at least nine occasions. There's also been three public meetings, and there was a community meeting as well. The current board approved the amendment

AAW!

TRANSCRIPT EXCERPT OF THE COMMISSION ON  
ENVIRONMENTAL QUALITY MEETING DECEMBER 2004.

AT THE PREVIOUS MONTH'S MEETING, NOV. 2004, THE COMMISSION HEARD COMMENTS ABOUT THE MADISON COUNTY WASTE PLAN. THE TRANSCRIPT OF THAT MEETING WHEN THE BILBERRY ATTORNEY SHOWED THE COMMISSION PHOTOS OF THE SCREEN IS ATTACHED.

THIS PICKS UP AFTER MDEQ HAS BRIEFED THE COMMISSION RE. THE PREVIOUS MONTH'S MEETING, AND IS READY TO ANSWER QUESTIONS.

. . .

MARK WILLIAMS: We are bringing this matter back to you for your further consideration. I and Roy Furrh, the chief legal counsel, are here to answer any questions the Commission may have related to this matter, and there are other representatives of the County here also . With that I'll close and offer to answer any of your questions related to the Madison County Solid Waste Plan, any particulars

MARTHA DALRYMPLE: What is the width of the buffer that they have agreed to place around, the uh, what difference is there between that requirement, and uh what they've agreed to, and the State requirements.

MARK WILLIAMS: They haven't really agreed to anything as a result of this planning process, in the Environmental Permitting

Process there is a buffer zone that is required of them, they don't have to agree to it, it's required, it's a 500 foot setback distance from the property line to the edge of the disposal area.

WRONG: HERE IS THE ACTUAL LAW. AND THIS IS WHAT NCL COMPLIES WITH

For landfills, the setback shall be at least 500 feet, EXCEPT where adequate on-site screening, whether natural or artificial, will restrict the offsite view of the landfill, in which case the setback shall be no less than 250 feet.

MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY  
REGULATION SW-2: NONHAZARDOUS SOLID WASTE  
MANAGEMENT REGULATIONS & CRITERIA SECT. III, T, 1-D

MARTHADALRYMPLE: That's a vegetative buff..?  
interrupted

MARK WILLIAMS: Well what you're referring to is, if there is, they can request an exclusion to that setback distance be reduced, but if they request that, they have to have a visual screen, something that's visual screening of the landfill, on that side where the reduced buffer is. So if they reduce the buffer from 500 ft to 250 ft. they have to have visual screening there that would prevent site of the landfill operation. But that is primarily done as a part of the permit process, and that hasn't really been agreed upon or talked about or part of the review of the planning matter.

Not sure where that is in the "requirements" listed in  
MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY  
REGULATION SW-2: NONHAZARDOUS SOLID WASTE

COMMISSIONER: Are they required to pick up the litter

MARK WILLIAMS: Probably not, subject to maintenance of Hinds County

MARTHA DALRYMPLE: I move that we accept it, let it move forward through the permit process, along with a recommendation that the permit board review the buffer zone and to increase it and to even more than 500 ft, seeing as that the acreage is so large, and that they look into some kind of ability to clean up the road in more of just a recommendation that we move forward with this recommendation on those two items

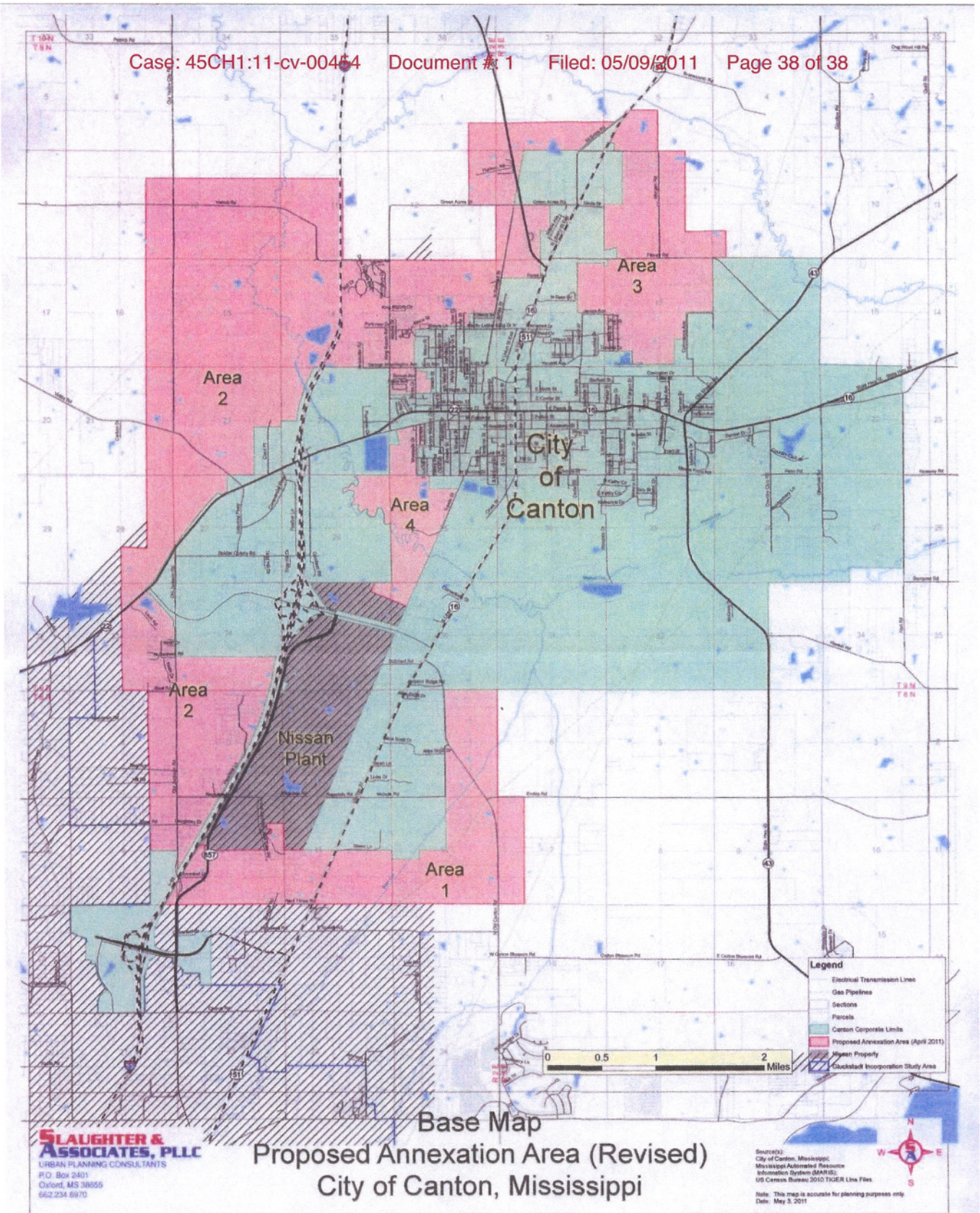
COMMISSIONER: Second

CHARLES CHISOLM: Mr Chairman, may I comment on the motion just for clarity. I think the spirit of the motion of Ms. Dalrymple is that the permit board be aware of the Commission's interest and concerns on those two points. I think its important for the integrity of the process that we have in the state, that the commission and permit board remain as separate ,independent entities. I know that the Commission appreciates and understands that, so within the context of what I tried to establish with what I just said, I think it'd be a perfectly

proper thing for the Commission to do.

COMMISSION CHAIRMAN: We have a motion  
and a second

Unanimously Passed.



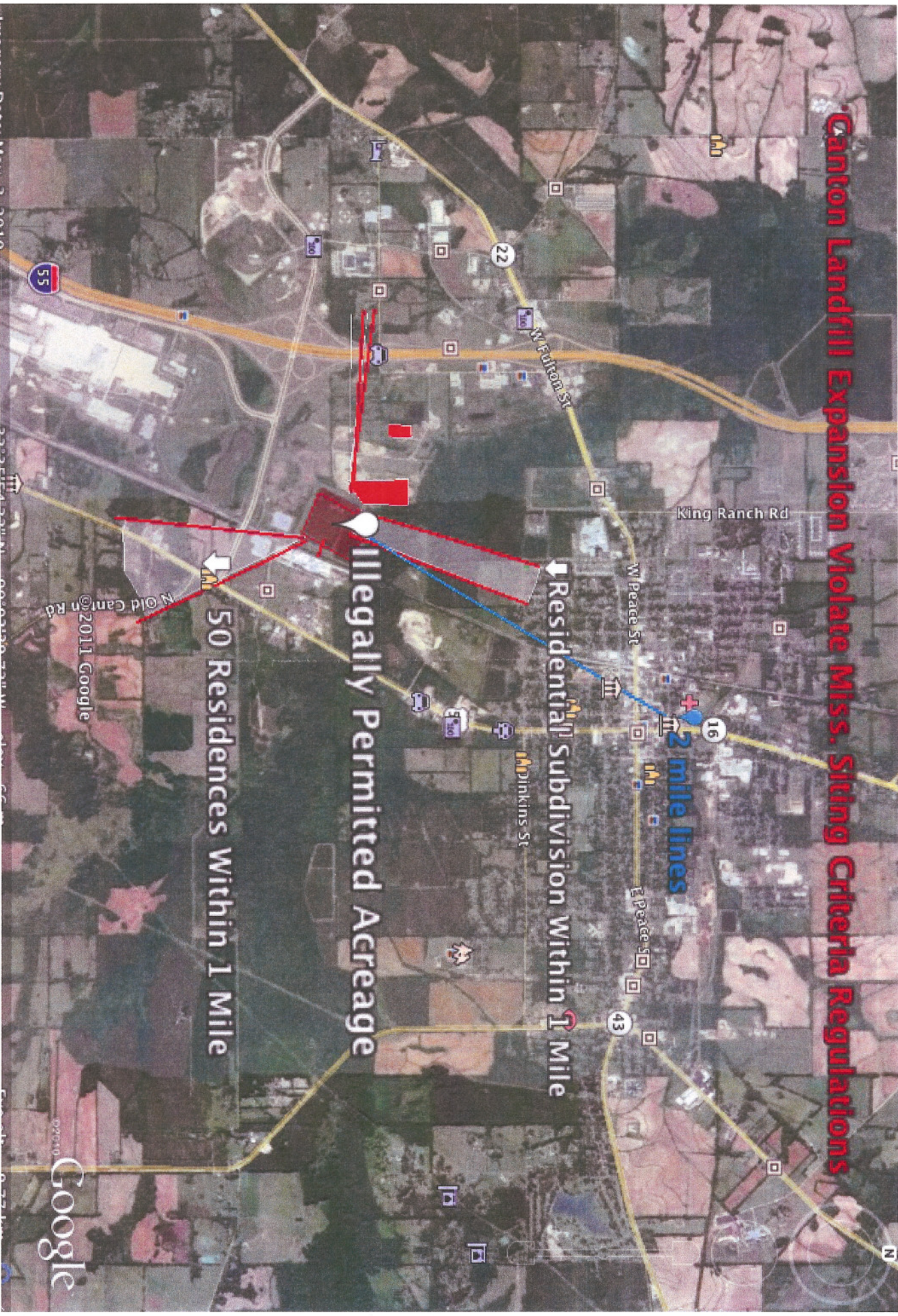
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**Base Map**  
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**City of Canton, Mississippi**

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Date: May 3, 2011



**Canton Landfill Expansion Violate Miss. Siting Criteria Regulations**





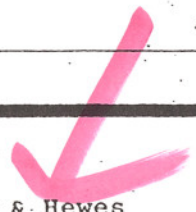
BFI Road Memphis



# APPLICATION FOR SPECIAL EXCEPTION Variance

Fax: \_\_\_\_\_

<b>Name and Address of Applicant:</b> BFI Waste Services, LLC BY: Brunini, Grantham, Grower & Hewes P. O. Drawer 119 Jackson, MS 39205 948-3101	<b>Street Address of Property (if different address):</b> 1716 N. County Line Road Jackson
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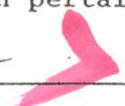
APPLICATION DATE	Present Zoning of Property	Legal Description of Property:	TAX PARCEL NUMBER	FLOOD ZONE	MAP/PLAT OF PROPERTY
Oct 16, 2002	I-1 Industrial	See (Exh A)	71I-31-3/01	X	See (Exh B)

Other Comments: As per Section 504.1 of the Madison County Zoning Ordinance.

PI is requesting a vertical expansion for the landfill operation at this site. The application to MDEQ is for an approximately 50 foot expansion above its presently permitted height to an elevation of 500 feet above sea level. See attached letter for additional information pertaining to the request for variance.  
 Respectfully Submitted

*John E. Niche*

ATTORNEY FOR BFI WASTE SERVICES LLC



Petition was accepted by the Madison County Board of Supervisors  
 their meeting on \_\_\_\_\_

Petition submitted to Madison County Planning and Development  
 Commission on \_\_\_\_\_

Recommendation of Madison County Planning and Development  
 Commission on Petition \_\_\_\_\_

Public Hearing date as established by the Madison County Board of  
 Supervisors \_\_\_\_\_

Final disposition of Petition \_\_\_\_\_

**In the Matter of Approval of a Variance to the Madison  
County Zoning Ordinance**

**RESOLUTION**

WHEREAS, BFI Waste Services LLC, filed a petition with the Board of Supervisors seeking a determination of non-applicability of the ordinance or in the alternative, a variance from Madison County's height restriction of 35 feet for a structure on the company's property known as the Little Dixie Landfill, which is located in section 31, Township 7 North, Range 1 East, Madison County, Mississippi; and

WHEREAS, representatives of BFI Waste Services LLC appeared before the Board of Supervisors and presented evidence that a variance in height was necessary to accommodate future solid waste disposal needs for Madison County and the surrounding area; and

WHEREAS, Mr. Brad Sellers, Zoning Administrator, informed the Board that the Madison County Planning Commission had recommended the approval of the variance, as requested by BFI Waste Services LLC.

Following additional discussion of this matter, Supervisor Karl M. Banks moved and Supervisor Paul Griffin seconded a motion specifically finding that

a) that special conditions and circumstances exist which are peculiar to the land, structure or building involved in which are not applicable to other lands, structures, or buildings in the same district;

b) that the literal interpretation of the provision of this ordinance would deprive the applicant of rights commonly enjoyed by other properties in the same district under the terms of this ordinance;

c) that these special conditions and circumstances do not result from the actions of the applicant; and

d) that the granting of the variance requested will not confer on the applicant any special privilege that is denied by this ordinance to other lands, structures or buildings in the same district; and

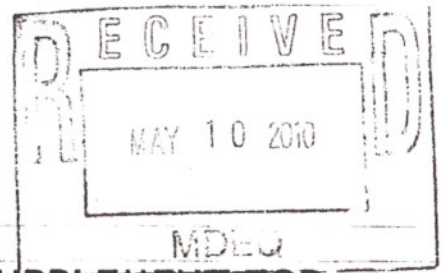
e) No non-conforming use of neighboring lands, structures, or buildings in the same district, and no permitted or non-conforming use of lands, structures, or buildings in other districts were considered as grounds for this variance.

And the Board did specifically find that the reasons set forth above as stated in the petition justify the granting of the variance in height of approximately fifty (50) feet above its presently permitted height (by the Mississippi Department of Environmental Quality) to an elevation of five hundred (500) feet above sea level and that the variance is the minimal variance that will make possible the reasonable use of the land, structure or building and that the granting of the variance will be in harmony with the general purpose intent of the ordinance and will not be injurious to the neighborhood or otherwise detrimental to the public welfare. The vote on said matter was as follows:

Supervisor W. T. "Bill" Banks - District I	Voted: Aye
Supervisor Marc Sharpe - District II	Voted: Aye
Supervisor David H. Richardson - District III	Voted: Aye
Supervisor Karl M. Banks - District IV	Voted: Aye
Supervisor Paul Griffin - District V	Voted: Aye

The motion having received the affirmative vote of the Board members present, was declared by Mr. David H. Richardson, President of said Board as being duly carried on this the 15th day of November, 2002. A copy of said executed resolution is found in the miscellaneous file to these minutes.

President's Initials: DHR



**TECHNICAL SUPPLEMENT FOR  
DESIGN MODIFICATION TO THE  
FINAL COVER GRADES AT**

**Little Dixie Landfill  
Madison County, Mississippi**

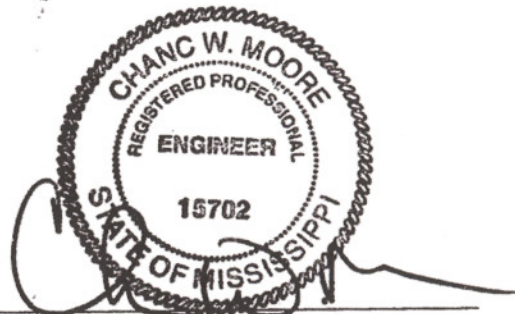
October 22, 2008  
Revised April 30, 2010

Prepared For:



BFI Waste Systems of North America, Inc.

Prepared by:



Chanc W. Moore, P.E.  
Senior Engineer

Aquaterra File No. 0110800045

Aquaterra Engineering, LLC  
240 Heritage Walk · Suite 103 · Woodstock, GA 30188  
Tel. 770.924.9799 · Fax 770.924.7866

# TECHNICAL SUPPLEMENT FOR DESIGN MODIFICATION TO THE FINAL COVER GRADES AT

Little Dixie Landfill  
Madison County, Mississippi

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## 1.0 INTRODUCTION AND PURPOSE

Little Dixie Landfill (the "Facility" or the "Site") is a solid waste disposal facility owned and operated by BFI Waste Systems of Mississippi, LLC, (BFI), a subsidiary of Allied Waste Industries, Inc. The Facility is a municipal solid waste landfill that was permitted, designed, constructed and is operated under the Mississippi Solid Waste Planning Act of 1991. The Facility operates under Solid Waste Management Permit No. SW04501A0238.

Little Dixie Landfill was originally permitted in April 4, 1989, by BFI Waste Systems of North America, Inc. An expansion of the Facility and major modification to the design and operational plans were prepared by Eco-Systems, Inc., and approved in August, 2002. Minor modifications to the base and final grades associated with Phase 4 were prepared by Aquaterra Engineering, LLC and approved by Mississippi Department of Environmental Quality (MDEQ) in April, 2007.

The proposed modifications related to this application include revising the final cover grades to a ridge and valley design and removing the FML component of the final cap to match the bottom liner system. The ridge and valley design provides additional waste capacity with no increase in final cover maximum elevation and maintains minimum sheet flow and trench drainage slopes of 4 percent.

Removal of the FML component of the final cap is possible due to the low infiltration rates inherent with the clays of the Yazoo formation. The site is currently permitted with an alternate base liner system that does not contain a synthetic flexible membrane liner (FML). It is our opinion that a final cover without FML meets the demands of the regulations that require the cap to have a liner system with similar infiltration characteristics as the base. Additionally, a cap with no FML is more easily repaired and protected from erosion, and is more sustainable against slides potentially caused by moisture or gas at the FML/clay interface in the long term.

This document serves as a supplement to the current permit, and presents a summary of the proposed modifications to the design of the facility. A brief narrative describing each requested modification is provided in this report. Technical supplements relating to the engineering design of the modifications are included as appendices to this document.

## 2.0 ASSOCIATED DOCUMENTS

Appendix A includes engineering drawings that are revisions of the original permit drawings. Specifically, the enclosed sheets 20A, 21A, and 22A, replace the original permit sheets 20, 21, and 22, respectively. Sheet 20A, "Final Contours and Stormwater Runoff Plan," and sheets 21A and 22A, "Final Cover Landfill Cross-Sections" present the redesigned final cover. The enclosed sheet 28 is a new detail sheet being added to the set to provide additional erosion control down drain details not included in the original permit.


Appendix B presents the slope stability calculations for the final grading design. Appendix C contains the H.E.L.P. model analysis associated with leachate head on the clay liner. As expected, minor changes to the cap geometry have minimal effects to the expected head on the liner. Appendix D includes calculations associated with the modified storm water conveyance system.



### 3.0 PROPOSED MODIFICATIONS

#### 3.1 Final Grading - Ridge and Valley Design

##### 3.1.1 Grading

The final cover configuration has been modified to maximize landfill efficiency. The proposed ridge and valley configuration utilizes alternating ridges and valleys atop the landfill deck, which maximizes the height of the 4H:1V side slopes and maintains a minimum four (4) percent sheet flow across the top deck and in the valleys. The design does not exceed the currently permitted maximum height elevation of 510.0. The facility will increase its final fill volume by 1,819,300 cubic yards compared to the permitted final airspace (7,362,100 cubic yards) without a lateral or vertical expansion. 

Drawing 20A depicts the proposed final grades represented as the top of the erosion and vegetation layer. The modified design also considers the current configuration of features such as sedimentation ponds, which were not well-defined in the original permit drawings. Cross-sections through the alternating high and low points of the ridge and valley cap are depicted in the engineering drawings 21A and 22A.

##### 3.1.2 Stability

Slope stability analyses were conducted to analyze the effect of the proposed modification of the final cover at the existing facility. The proposed maximum elevation of the waste is at Elevation 509 feet and the lowest elevation of the toe of the disposal area has an elevation of approximately 375 feet, which results in a maximum waste height of approximately 134 feet. The maximum inclination of the side slopes is 4H:1V. The following sections detail the analyses performed to confirm slope stability.

###### 3.1.2.1 Engineering Properties of Soil and Waste

Subsurface conditions for the analyses were interpreted based on the soil conditions presented in Aquaterra Engineering, Inc. report, *Evaluation of Siting Criteria - Proposed Landfill Expansion - Little Dixie Landfill - Madison County, Mississippi* dated November 22, 1996. The information presented in the 1996 report was previously submitted to MDEQ as part of previous permit documentation for the existing facility. Based on a review of this information, the natural soils forming the subgrade below the waste at this facility consist predominantly of clays (CH) of the Yazoo Formation.

Clays of the Yazoo Formation are commonly referred to as Yazoo clays and are typically high plasticity clays with very low permeability. Yazoo clays typically have very strong undrained strengths and are highly over-consolidated. Shear strength and physical properties of the Yazoo clays underlying the waste material were conservatively estimated using the laboratory data and soil borings presented in the referenced report. The engineering properties of the waste materials were conservatively estimated using published data for landfill waste materials and using parameters that have typically been accepted by MDEQ as representative of municipal solid waste landfills. The soil and waste properties utilized in the analyses are shown in the upper left corner of the attached slope stability results. The undrained (short-term) and drained (long-term) strength of the waste mass are considered to be equivalent, and the undrained strength of the underlying Yazoo clays are significantly higher than the drained parameters. Consequently, global stability analyses were performed for the controlling drained condition.

### 3.1.2.2 Global Stability

Based on a review of the site geometry, the most critical section for global stability is the west slope of the facility as characterized by Landfill Section A, illustrated on Sheet 21A, at the point where the maximum waste height is present.

Global stability analyses were completed using limit-equilibrium methods. The computer program GSTABL7 was utilized to allow for rapid analyses of a large number of potential failure surfaces in order to find the "minimum" factor of safety. The factor of safety represents the ratio of the forces tending to resist rotational failure to the forces tending to cause rotational failure. A factor of safety of 1.0 represents conditions of incipient (pending) failure. A commonly accepted adequate factor of safety for static landfill stability is 1.3. Analyses were performed considering both circular and non-circular failure surfaces for the controlling drained condition.

The results of the slope stability analyses performed for the critical cross section are presented on the figures contained in Appendix B. Two figures are presented for the circular and non-circular scenarios analyzed, the first figure shows the surface analyzed for each case and a second figure shows the ten most critical shear surfaces located along with the soil and waste properties utilized in the analyses. The results of the analyses are summarized in the table below.

Type of Failure Surface	Minimum Factor of Safety
Circular	2.62
Non-Circular	2.56

The results of the analyses indicate a minimum factor of safety in excess of 1.3. Based on the results of these analyses, the ridge and valley design proposed in this report will have an adequate factor of safety against a global stability failure.

### 3.1.2.3 Veneer Failure

The revised grading design includes tack-on diversion berms to control stormwater over the 4H:1V side slopes. These berms will constitute a critical location for veneer failure of the slope. The diversion berms shall be constructed as a compacted soil berm with 2H:1V slope, consisting of lean clay (CL), silty clay (CL), sandy clay (CL), or clayey sand (SC), with at least 30 percent passing the #200 sieve and a Plasticity Index of at least 8. The soil for the berm shall be compacted to a density of at least 95% of the maximum dry density and at a moisture content greater than or equal to the optimum moisture content as determined by the Standard Effort Compaction Test, or "Standard Proctor" (ASTM D-698). In addition, the berm fill should be keyed into compacted clay infiltration layer to minimize slippage planes. Any vegetative materials should be completely grubbed from the slope prior to placement of the berm fill. These soil and construction parameters will result in a berm with adequate factor of safety against global and veneer stability. The results of slope stability evaluations for the berms are provided in Appendix B.

### **3.1.3—Subgrade Settlement Analysis**

The final cover modifications will result in a slightly greater thickness of waste along the edge of the top deck, as compared to the originally permitted waste thickness. The thickened waste areas proposed by this modification will add approximately 15 to 20 feet of waste at the edge of the top deck.

The additional waste is small compared to the overall thickness of waste (approximately 150 to 170 feet) at the same location. The Yazoo clay soils underlying the landfill are highly over-consolidated, and therefore, are not highly compressible. The settlement induced by the additional 15 to 20 feet of waste will be negligible. Additionally, the additional waste at the outer edges of the facility will tend to minimize differential settlements and produce a more uniform settlement profile.

### **3.1.4 Infiltration Modeling**

The revised final cap grading includes a non-synthetic final cap cover design. The proposed final cap cover design consists of a vegetated, 6" erosion layer, over a 24" compacted clay infiltration layer with a permeability of  $K \leq 1.0 \times 10^{-7}$ .

Analyses of the maximum leachate head on the clay liner were studied using the Hydrologic Evaluation of Landfill Performance (H.E.L.P.) model computer program, Version 3.07. Because the critical leachate travel path (longest, flattest slope) along the base liner system is in an area where waste has existed for some time, the effects of the cap modification are studied for intermediate and final conditions rather than for the initial condition of a newly opened cell. These analyses were calculated for the height of waste with final cover conditions after 30 years, and the intermediate height with daily cover after 10 years. The analyses were conducted along the critical slope of base grade, which is defined as the longest distance liquid must travel to reach the piped leachate collection system.

The results from the final (closed) and intermediate conditions indicate the maximum leachate head on the clay liner of 0.42 and 4.77 inches, respectively, are less than the regulatory maximum, 11.8 inches (30.0 cm).

### **3.1.5 Stormwater Management**

The final cover grading modification will change stormwater conveyance at the site. The runoff from the proposed ridge and valley final cover slopes will be conveyed with stormwater benches, diversion berms, and corrugated plastic down drain pipes. The nominal vertical spacing of stormwater diversions remains thirty (30) feet (measured vertically), as currently permitted. Diversion berms and ditches will be utilized to direct the stormwater at the base of the landfill toward the existing sediment ponds as previously designed and approved.

The down drain pipe size was determined using the Rational Method formula, and by using Manning's equation. The 25-year rainfall intensity "i" of 8.5 in/hr was determined from Figure 7-4C, Rainfall Intensity-Duration-Frequency Curves of the Mississippi Department of Transportation Roadway Manual, 2001 Edition. A Manning's coefficient of 0.022 was used for the corrugated HDPE plastic pipe. Runoff Coefficients of 0.50 and 0.70 were used to calculate runoff for the top and side slope tributary areas, respectively. The largest tributary to an individual inlet was used to determine the recommended pipe diameter of 24 inches to convey the stormwater runoff.

The proposed modifications will affect the stormwater conveyance system, but will not change

the sediment storage and treatment capabilities of the ponds. The originally approved design for the site's sediment pond network will not be altered under this request. Aquaterra did not analyze the sedimentation pond design or perform storm routings through the permitted discharge structures. Sheet 20A, "Final Contours and Stormwater Runoff Plan," included in the Appendix, depicts the proposed stormwater conveyance system and direction of runoff flow on the landfill.

### **3.1.6 Landfill Phasing**

The phasing of the landfill will continue to follow the permitted phasing of cells. This sequencing has been determined to benefit the facility economically and logistically because of the unique characteristics of the facility's property boundary, drainage, and infrastructure. The revised grading of the final cover will not alter the permitted phasing of the cells.

1 The Permit Board's decisions can be appealed back first to  
2 the Permit Board, and they can be appealed later to  
3 Chancery Court. So regardless of what the decision is, if  
4 it's approved it can be appealed, or if it's denied, it  
5 can be appealed. That in a short kind of a summary way is  
6 the process.

7 Now I know that's it's kind of hard to see this  
8 and I apologize for that. There are some better drawings.  
9 I want to talk a little bit about where the facilities on  
10 North County Line Road are in that process. This is North  
11 County Line Road here. The yellow facility at the bottom  
12 is the current Little Dixie Landfill operated by Republic  
13 Waste Services. They have been operating since 1979.  
14 They have a permitted acreage of 165 acres and they range  
15 about 100 in height, about 100 to 150 feet above grade in  
16 height. Currently they have a permit revision request  
17 before us. They want to re-design the top of their  
18 landfill to a different kind of top that allows them to  
19 have more disposal capacity. They will not go any higher.  
20 They will not affect any greater footprint than already  
21 permitted. But they are re-designing to gain capacity.  
22 When we get through with our review of that, we will be  
23 having a public participation process on any  
24 recommendation that we've made there. So we'll have a  
25 public hearing on Republic Waste Proposal.

Not  
go  
higher



Transcript  
from Church



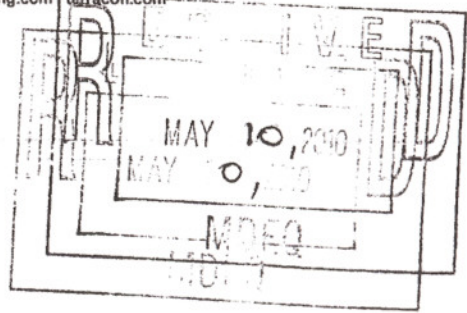
**AQUATERRA**  
ENGINEERING LLC

A Terracon COMPANY

240 Heritage Walk, Suite 103 • Woodstock, Georgia 30188  
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April 30, 2010

Mr. Charles Bock  
Mississippi Dept. of Environmental Quality  
Office of Pollution Control  
Environmental Permits Division  
Mining and Solid Waste Management Branch  
515 E. Amite Street  
Jackson, MS 39201



**RE: Little Dixie Landfill - Major Modification Request**  
1716 N. County Line Road, Ridgeland, MS  
MDEQ Facility ID No. 172000023  
MDEQ Ref. No. SW04501A0238  
Aquaterra Project Number EJ107433

Dear Mr. Bock:

As requested in your letter dated March 24, 2010, we have revised the proposed modification plans for the Little Dixie final cap design. Enclosed, please find the revised plan sheets, the revised Technical Report, an updated SWPPP, and an Air Emissions Estimate for the expansion. Additional copies will be provided upon your satisfactory review and request.

The following paragraphs reiterate your comments (in italics) followed by our responses:

1. *Our regulations state that 4% is the minimum slope allowable on the cap of a landfill. The drawings depict that the trenches on the cap will be sloped at 2%. Please provide a demonstration or calculations to justify this variance to our regulations.*

The final cap grading plan has been revised to indicate 4 percent minimum slopes in the trenches and across areas of sheet flow.

2. *In Section 3.1.3 of the application, as a result of this vertical expansion, settlement beyond estimated quantities (pre-modification) is explained to be expected along the perimeter. The next paragraph says that analysis shows no settlement near the edges of the landfill, which means the perimeter sumps would not be adversely affected. These two statements seem to contradict one another. Please clarify, and discuss whether or not perimeter sumps will be affected by extra settlement.*

The application report has been revised. The perimeter sumps will not be affected by extra settlement.

3. *Drawing 20 depicts Downdrains K and L leading into an "existing borrow area." Is this supposed to be a sedimentation pond, or will stormwater be directed into a borrow pit? Is there any overflow mechanism on this borrow area? Will it become a sediment pond upon closure? Please clarify this information.*

The downdrain layout has been revised, so that the downdrains discharge into an existing ditch that flows into the sediment pond west of the borrow area. The borrow area is not planned to be converted to a sediment pond. The plan has been revised to indicate a new ditch that will serve to drain the borrow area into the sediment pond.

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Mobile, AL  
251.443.5374

4. *Please submit an updated storm water pollution prevention plan (SWPPP). The SWPPP needs to address all the outfalls at the site. Will this modification call for any new outfalls or the moving of any current outfalls? Also, please discuss the need for sedimentation basins. Are any basins proposed to be expanded, or are any new basins proposed? Please also be sure to detail (drawings) the storm water routing across the entire site. Our review of the SWPPP will determine whether or not the NPDES storm water permit will need to be modified as well.*

A revised SWPPP is enclosed with this application. No new outfalls are proposed; no existing outfalls are proposed to be moved or otherwise modified. No sediment basins are proposed to be expanded that have not already been permitted. We note that the "future sediment pond" located in the southwest property corner was previously noted on the Ecosystems permit drawings, dated April 13, 2001, although the proposed grading was not previously shown. The SWPPP figures have been updated to reflect the currently proposed changes and to provide additional detail per your request. We have also updated the petroleum tank locations shown on the SWPPP figures, and updated the narrative section in the report.

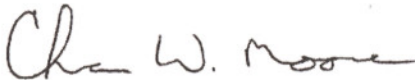
5. *Please perform a new air analysis based on the expanded air space and submit the corresponding updated air emissions inventory.*

A new air analysis has been performed by SCS Engineers. Please refer to the provided Air Emissions Estimate for Landfill Capacity Expansion, dated April 27, 2010.

Please call if you have any questions or require additional information.

Sincerely,

**AQUATERRA ENGINEERING, LLC**



Chanc W. Moore, P.E.  
Senior Engineer

encl

cc: Amber Hoffman - Republic Services



# Coaching

Public Notice of Hearing  
Mississippi Environmental Quality Permit Board  
P. O. Box 2261  
Jackson, MS 39225  
Telephone No. (601) 961-5171

Public Notice Start Date: November 14, 2011  
Deadline For Comment: December 15, 2011

MDEQ Contact: Lynn Chambers

NCL Waste, LLC has applied to the Mississippi Department of Environmental Quality (MDEQ) for a Solid Waste Management Permit for the Construction and Operation of a Municipal Solid Waste Landfill known as the North County Line Landfill proposed to be located at 2858 North County Line Road in Ridgeland, MS. The applicant's proposed solid waste management operations fall within SIC Code 4953. The MDEQ will hold a public hearing on this application at 7:00 p.m. on December 15, 2011, at the Tougaloo College Holmes Hall Auditorium located at 500 West County Line Road, Tougaloo, MS, 39174, (601) 977-7744 to solicit public comments on the proposed project.

NCL Waste LLC has proposed the North County Line Landfill as a 94.27 acre Municipal Solid Waste Landfill located on 166 acre property owned by NCL Waste LLC in Madison County east of the Hinds/Madison County Line. The proposed capacity of the landfill is 14.2 million cubic yards and if approved, the anticipated waste volume is 600 tons per day of nonhazardous solid waste from operation of residential, commercial, governmental, industrial or institutional establishments.

The staff of the Permit Board has been unable to reconcile a setback distance from the property boundary to the waste disposal area with the applicant, and therefore has been unable to draft a solid waste management permit based on the information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the staff recommendation complies with all State and Federal regulations. Public review and comment is an important element in the staff evaluation and resulting recommendation to the Permit Board.

Persons wishing to comment upon or object to the proposed project are invited to submit comments in writing to Lynn Chambers at the Permit Board's address shown above, no later than December 15, 2011. All comments received by this date will be considered in the formulation of final recommendations regarding the application. The Permit Board is limited in the scope of its analysis to environmental impact. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will present its recommendation of the Solid Waste Management Permit application to the Permit Board.

The Permit Board is created by Mississippi Law for the purpose of issuing or denying, under such conditions and limitations as it may prescribe, environmental protection permits to control or prevent the release of contaminants into the air and waters of the State. By law, the Board is composed of the Chief of the Bureau of Environmental Health within the State Department of Health; the Director of the Department of Wildlife, Fisheries, and Parks, the Director of the Office of Land and Water Resources within the Department of Environmental Quality, the Supervisor of the State Oil and Gas Board; the Director of the Department of Marine Resources; the Director of Geology within the Department of Environmental Quality; and the Commissioner of Agriculture and Commerce.

The Purpose of this hearing is to explain the proposed project and to receive comments from the public regarding the project and particularly the draft permits and the disclosure statement. Upon arrival at the public hearing, everyone will be asked to register and note if they expect to make a statement. Statements will be received in the order of registration (i.e., first to register will be the first to give public comment). However, everyone will be given an opportunity to comment including those who indicated during registration that they did not expect to comment. Persons commenting will not be limited to any specific time so long as the comments are reasonably concise and relate, at least generally, to the responsibilities of the Permit Board. However, because a large number of people often wish to speak, comments should be as brief as reasonably possible. Comments can be presented in writing if preferred. In order to help facilitate understanding between citizens and the Permit Board staff, the staff will attempt to answer questions at the hearing. However, such interchanges should be as brief as possible so that everyone who wants to speak has the opportunity as promptly as possible.



All comments made during this public hearing will be transcribed and made a part of the Permit Board file in this matter. Before making any decision, the Board will consider all issues and concerns raised regarding environmental protection. Any interested party aggrieved by the decision of the Permit Board may file a written request for a formal hearing, after which the Permit Board will make its final decision in the matter. Any person aggrieved by that decision may appeal to the chancery court in the county of the proposed project.

Additional details about the application are available by writing or calling Lorenzo Boddie at the above Permit Board address and telephone number. This information is also available for review at the following location during normal business hours:

Mississippi Department of Environmental Quality  
Office of Pollution Control  
515 E. Amite St  
Jackson, MS 39201

Please bring the foregoing to the attention of persons whom you know will be interested.

1 halted anywhere along the process. They can be stopped  
2 before they get to us, before we ever get an application.  
3 They can be stopped and we don't ever make an action to  
4 deny or issue something because an applicant can't respond  
5 to a deficiency. So usually you never hear about  
6 landfills that never get to that point of a recommendation  
7 --

8           KEVIN BINGHAM: -- let me rephrase the question  
9 then. Of the percentage of landfill applications or  
10 permits of people that are requesting permits, are there a  
11 greater number that are approved or denied?

12           MARK WILLIAMS: When we get to the point of going  
13 all the way through the process, and we are not there yet,  
14 but when we get through that, most permits are approved.  
15 That's correct. When we get through the process to where  
16 we have a final decision, the majority of permits are  
17 approved by the time we get to that point.

18           KEVIN BINGHAM: Great. And of those permits that  
19 are approved, is there the same further objection to those  
20 permits that has been voiced tonight? In other words, is  
21 there any community that says that we want a landfill and  
22 gets it, and a community that says we don't want a  
23 landfill, that does not get it?

24           MARK WILLIAMS: There is the human opposition of  
25 the landfills in various areas of the State. It occurs

1 from Alcorn County to Wilkinson County to Desoto County to  
 2 Jackson County. We do the best that we can to try to  
 3 evaluate the impacts, implement the law, and regulate in a  
 4 manner that we are required to do and make the best  
 5 possible decision. So we have opponents to the  
 6 landfills. And we have people that understand they are  
 7 necessary and sometimes important. But yes, it's a very  
 8 -- it's a pretty difficult thing.

9 KEVIN BINGHAM: My last question, the last  
 10 question. And thank you for that answer. And that would  
 11 basically be, of the ones that are rejected, what is the  
 12 primary reason that they are rejected. I just want to  
 13 guard against us just having a venting session here where  
 14 you are just hearing our views. Everybody is objecting to  
 15 this. I am sure you heard the same objections before.  
 16 But I want to know, what specific, if you could be as  
 17 specific as possible, what are the primary reasons that a  
 18 permit is denied. Now, I will sit down and listen to your  
 19 answer.

20 AMY WHITTEN: Thank you, sir.

21 MARK WILLIAMS: Well, I think there are really  
 22 three areas where citizens are involved in the process  
 23 when permits get denied. The first one is you're involved  
 24 politically. On the front end of the decision when  
 25 elected officials are making the decisions about things.

what  
 do we  
 need  
 to say!

1 That's where some landfills are stopped. There is an  
2 involvement at the local level.

3 The second one is the technical process. That's  
4 the process that we're in right now. Sometimes citizens  
5 can bring about flaws in a project or concerns in a  
6 project that we can't get beyond or we can't get over.

7 Then, there are technical reasons. And that's  
8 the issues with the detection, designs, setbacks. We have  
9 citizens that get very involved in looking at those  
10 issues.

11 Then the final thing is our legal challenges. We  
12 get beyond that technical situation and there are legal  
13 challenges. The legal system and courts and citizens may  
14 be able to convince a court that something was not lawful  
15 about putting up a landfill or a solid waste. There are  
16 really three general areas where citizens participate and  
17 they influence decisions about landfills.

18 AMY WHITTEN: Thank you, sir. Before we get to  
19 this last comment, I want to also tell you that if any of  
20 you all were aware that every citizen has the right, and  
21 there is a mechanism in State Government, for you to ask  
22 for public information. We can't always come armed with  
23 every single piece of data. And those were very good  
24 questions by the way. We can't always come with the  
25 precise data, but if you want to know what a percentage of



COACHING

Notice of Public Hearing  
Mississippi Environmental Quality Permit Board  
P. O. Box 2261  
Jackson, MS 39225  
Telephone No. (601) 961-5171

Public Notice Start Date: June 28, 2010  
Deadline For Comment: July 27, 2010

The City of Canton submitted three applications for the modification and continued operation of the City of Canton Sanitary Landfill located at 303 Soldier Colony Road, Canton, Mississippi. The applications submitted were a solid waste management application for the modification and re-issuance of solid waste management permit SW04501B0378, re-issuance of storm water discharge permit MSS058548 and issuance of Title V Air Permit to Operate 1720-00080. The applicant's operations fall within SIC Code 4953. The permit board will hold a public hearing on this matter at 6:30 P.M., at the City of Canton Multipurpose Complex, 501 Soldier Colony Road, Canton, Mississippi on Tuesday, July 27, 2010.

The City of Canton Sanitary Landfill currently consists of approximately 139 acres of permitted disposal acreage. The proposed modification to the solid waste management permit includes a minor lateral expansion to connect the currently permitted disposal areas for a total disposal acreage of approximately 144 acres and a vertical expansion over the entire permitted acreage to a final height of approximately 90 feet above natural grade. The application for the re-issuance of the storm water discharge permit proposes the continued discharge of non-contact storm water to Bear Creek in the Big Black River Basin. The proposed expansion of the disposal area results in a design capacity greater than 2.5 million cubic yards of disposal volume. Therefore, the facility is subject to the permitting requirements established by Title V of the Clean Air Act. The City of Canton submitted an application for the required Title V Permit to Operate Air Emissions Equipment.

The staff of the Permit Board has developed this draft permit based on information submitted to the Permit Board by the applicant, appropriate State and Federal agencies and other interested parties. The staff of the Permit Board is soliciting all relative information pertaining to the proposed activity, including public comment, to ensure that the final staff recommendation on the draft permit complies with all State and Federal regulations. Public review and comment on the draft permit and supporting documentation is an important element in the staff evaluation and resulting recommendation to the Permit Board. The draft permit conditions have been developed to ensure compliance with all State and Federal regulations but are subject to change based on information received as a result of public participation.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Michelle Vinson at the Permit Board's address shown above, no later than July 27, 2010. All comments received by this date will be considered in the formulation of final determinations regarding the applications. Any comments relative to zoning or economic and social impacts are within the jurisdiction of local zoning and planning authorities and should be addressed to them.

After receipt of public comments and thorough consideration of all comments, the staff will formulate its recommendations for permit issuance and a proposed permit if that is the recommendation. The Title V Permit to Operate is a permit that is required by Title V of the Federal Clean Air Act and the Mississippi Air and Water Pollution Control Law. The Title V permit is a Federally-enforceable permit as well as a State permit. Therefore, the U.S. Environmental Protection Agency (EPA) will also be allowed an opportunity to review the application, proposed permit, and all comments received during the public comment period prior to Permit Board action on the application.

EPA has agreed to treat this draft permit as a proposed permit and to perform its 45-day review provided by the law and regulations concurrently with the public notice period, as long as no public comments are received within the 30-day public notice period. If comments are received, EPA's 45-day review period will cease to be performed concurrently with the public notice period. EPA's 45-day review period will start once the public notice period has been completed and EPA receives notification from the Mississippi Department of Environmental Quality that comments have been received and resolved. Whether EPA's 45-day review period is performed concurrently with the public comment period or after the public comment period has ended, the deadline for citizen's petitions to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended.

The status regarding EPA's 45-day review of this project and the deadline for citizen's petitions can be found at the following website address: <http://www.epa.gov/Region4/air/permits/Mississippi.htm>.

The Permit Board is created by Mississippi Law for the purpose of issuing or denying, under such conditions and limitations as it may prescribe, environmental protection permits to control or prevent the release of contaminants into the air and waters of the State. By law, the Board is composed of the Chief of the Bureau of Environmental Health within the State Department of Health; the Director of the Department of Wildlife, Fisheries, and Parks; the Director of the Office of Land and Water Resources within the Department of Environmental Quality; the Supervisor of the State Oil and Gas Board; the Director of the Department of Marine Resources; the Director of Geology within the Department of Environmental Quality; and the Commissioner of Agriculture and Commerce.

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Additional details about the applications, including a copy of the draft permits, are available by writing or calling Edna Banks at the above Permit Board address and telephone number. Additionally, as a courtesy, for those with Internet access, a copy of the proposed draft permits may be found on the Mississippi Department of Environmental Quality's website at: [http://opc.deq.state.ms.us/report\\_public\\_notice.aspx](http://opc.deq.state.ms.us/report_public_notice.aspx). This information is also available for review at the following location during normal business hours:

Mississippi Department of Environmental Quality  
Office of Pollution Control  
MDEQ 515 E. Amite St  
Jackson, MS 39201

Please bring the foregoing to the attention of persons whom you know will be interested.



**STATE OF MISSISSIPPI**  
HALEY BARBOUR  
GOVERNOR  
**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**  
TRUDY D. FISHER, EXECUTIVE DIRECTOR

February 25, 2010

Mr. Greg Harris  
1080 Thomas Lane  
Jackson, MS 39213

Dear Mr. Harris:

RE: BFI Waste Systems of MS, Little Dixie  
Landfill  
Madison County  
SW04501A0238

The Mississippi Department of Environmental Quality (Department) received your letter inquiring of further lateral development of the BFI Little Dixie Landfill and notification of pond overflows impacting your property. A copy of this letter has been forwarded to the Environmental Compliance and Enforcement Division for investigation into the pond overflow issue.

On October 14, 2003, the Mississippi Environmental Quality Permit Board re-issued the solid waste management permit approving the Little Dixie Municipal Solid Waste Landfill. The permit approval increased the vertical height of the above referenced facility, but the lateral dimensions of the landfill have remained unchanged from the October 1993 permit application.

According to our records, a permit application has been submitted for a modification of the crown of the landfill, but there has not been a permit application submitted nor a Solid Waste Management Plan Amendment submitted for a lateral expansion of the Little Dixie Landfill. Any lateral expansion of the landfill would require a modification to the Madison County Solid Waste Management Plan along with a permit modification. A lateral expansion of this landfill would require public notice and a public hearing before the matter could be reviewed and considered by the Mississippi Environmental Quality Permit Board.

Based on current maps of the existing site conditions and the proposed final site conditions, the sedimentation pond will remain unchanged (portions of these maps have been enclosed for your convenience). Soil excavation may continue on the northern

Mr. Harris  
Page 2  
Feb. 25, 2010

portion of the BFI Waste Systems of MS property, but disposal of waste in the excavation has not been requested by the applicant or approved by the Department.

If you have any questions or comments regarding this correspondence, please do not hesitate to contact me at (601) 961-5117.

Sincerely,

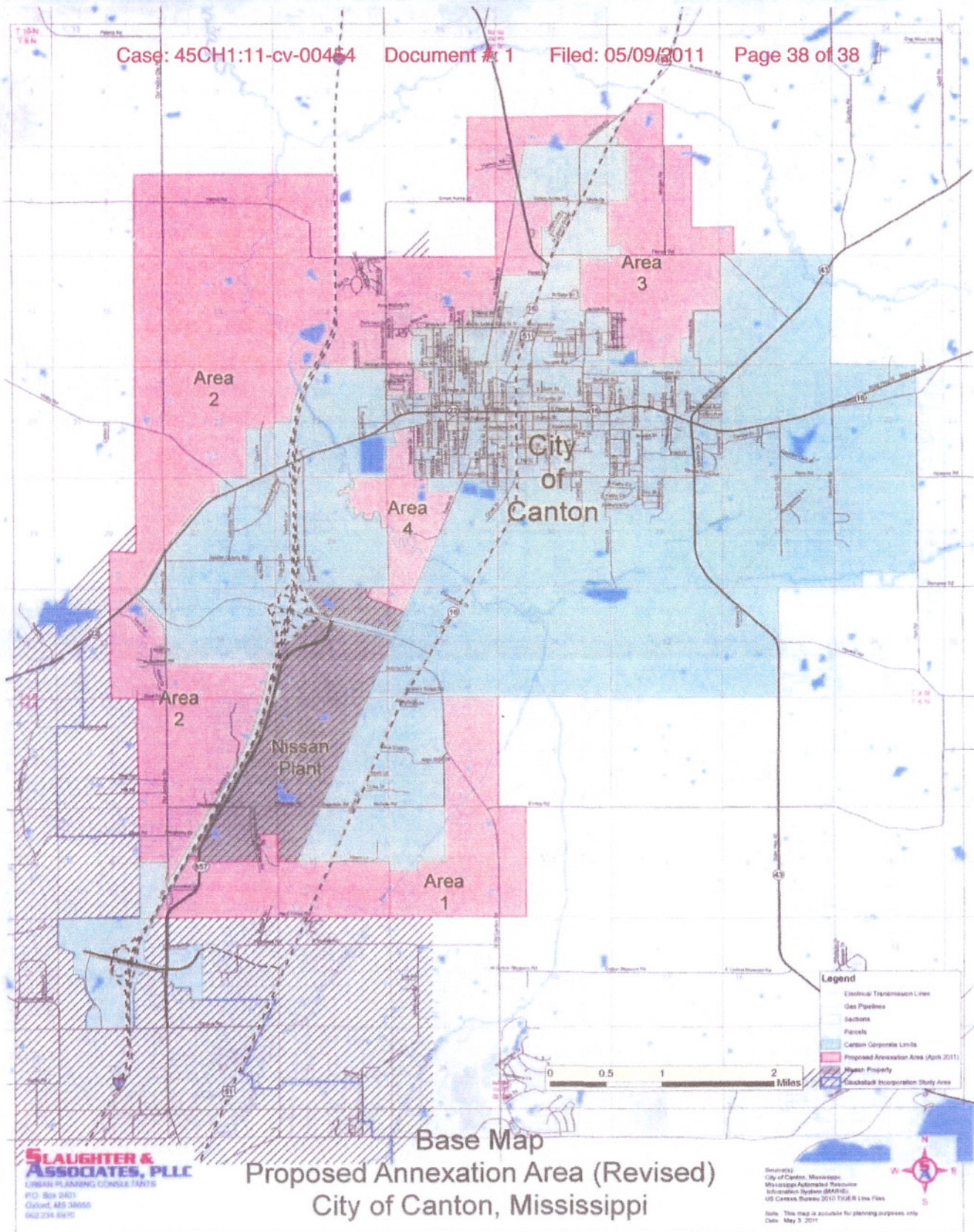
A handwritten signature in cursive script that reads "Lynn Chambers".

Lynn Chambers  
Environmental Permits Division

Enclosures

Cc: Ethan Mayeu, ECED





# CANTON VIBRAH



Imagery Date: May 3, 2010

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32°35'54.71" N 90°03'11.57" W elev 66 m

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Eye alt 1.59 km