

STATE OF MISSISSIPPI SOLID WASTE MANAGEMENT PERMIT

TO OPERATE A SOLID WASTE MANAGEMENT FACILITY IN
ACCORDANCE WITH THE REGULATIONS GOVERNING
SOLID WASTE MANAGEMENT

**THIS CERTIFIES THAT
Unified Waste Systems, LLC**

has been granted permission to operate a solid waste management facility
located at

**9353 Starlanding Road
Lake Cormorant, Mississippi
DeSoto County**

Section 21, Township 2 South, Range 9 West

under the name of

Starlanding Rubbish Disposal Facility

This permit is issued in accordance with the provisions of the Mississippi
Code Annotated, and the regulations and guidelines adopted and promulgated
thereunder

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



AUTHORIZED SIGNATURE

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: JAN 12 2016
Expires: DEC 31 2025

Permit No. SW0170020518

CONDITIONS

A. EFFECT OF PERMIT

The permittee shall operate the solid waste management facility in accordance with the Mississippi Nonhazardous Waste Management Regulations (state regulations), applicable federal regulations, the approved application and the conditions of this permit.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for noncompliance with the terms and conditions of the permit. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of the permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the solid waste law and regulations promulgated thereunder and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.
2. Duty to Reapply. If the permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the permittee must submit a complete application for a new permit at least 180 days before this permit expires.
3. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
4. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all equipment and systems which are installed or used by the permittee to achieve compliance with the conditions of this permit and application as submitted and approved by the Department of Environmental Quality (Department).

5. Duty to Provide Information. The permittee shall furnish to the Office of Pollution Control, within a reasonable time, any relevant information which it may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
6. Inspection and Entry. The permittee shall allow an authorized representative upon the presentation of credentials and other documents as may be required by law to:
 - a. Enter on the permittee's premises where a regulated activity is located or conducted, or where records must be kept under the conditions of this permit;
 - b. Have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under this permit;
 - d. Sample or monitor at reasonable times for the purposes of assuring permit compliance.
7. Transfer of Permits. This permit is not transferable to any person except after notice to and approval of the Permit Board. The Permit Board may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary.
8. Financial Responsibility Requirements. Should the Department determine operational conditions at the site warrant the establishment of financial responsibility, the permittee would be required to estimate the costs of hiring a third party to close the largest area ever requiring a final cover. At that time, the permittee shall be required to provide the Department with proof of financial responsibility issued in the amount of the closure cost estimate each year on a schedule approved by the Department.
9. Disclosure. The permittee shall submit an updated disclosure statement to the Department by February 28 of each year. If all information from the previously submitted disclosure statement is unchanged, a letter stating such may be submitted in lieu of an updated disclosure statement.
10. Property Access Rights. It is responsibility of the permittee to possess or acquire a sufficient interest in or right to the use of the property including access route. The issuance of this permit does not convey any property rights or interest in either real or personal property; nor does it authorize any injury to private property, invasion of personal rights, or impairment of previous contract rights; nor any infringement of Federal, State or locals laws or regulations.

11. Signature Requirements. An application for the re-issuance, modification or transfer of this permit and all reports required by this permit or other information requested by the Permit Board shall be signed in accordance with Rule 1.2.G of the Mississippi Nonhazardous Solid Waste Management Regulations.

E. CONSTRUCTION REQUIREMENTS

1. The permittee shall insure that construction of rubbish site components shall be conducted by qualified and experienced personnel.
2. The permittee shall ensure a minimum thickness of five (5) feet of naturally occurring soils between the uppermost aquifer and the base of the liner.
3. Construction of any sidewall or bottom liner shall be conducted in accordance with the following, unless an alternate method is approved by the Department:
 - a. An adequate number of field density, moisture content, permeability, and thickness tests shall be conducted depending on the extent of liner construction. Test holes in the reconstructed soil liner shall be sealed with bentonite, or another method approved by the Department. Testing frequency shall be consistent with QA/QC plan on file with the Department.
 - b. A professional land surveyor, registered with the State of Mississippi, shall prepare a survey of each cell upon cell construction completion.
 - c. At least two weeks prior to disposal in the area, a Quality Assurance/Quality Control construction assurance report and a copy of the certified survey shall be submitted to the Environmental Compliance and Enforcement Division, Solid Waste and Mining Branch. The report shall include field logs, results of testing and construction testing methods. The report shall also contain a certification from an independent professional engineer registered in Mississippi that verifies that the reconstructed liner meets the following criteria:
 1. For sidewall liner, the minimum thickness for in-situ liner shall be three (3) feet and shall meet the permeability requirements defined in the state regulations. Reconstructed liner shall be two (2) feet. The soil material used for construction shall be clays or silts with permeability no greater than 1×10^{-7} cm/sec.
 2. For bottom liner, the minimum overall thickness of the in-

situ liner shall be five (5) feet. Any constructed liner must have a minimum thickness of three (3) feet with a permeability of no greater than 1×10^{-7} cm/sec.

4. Prior to the placement of any solid waste in the disposal area:
 - a. All borings drilled on the site in preparation of the permit application, which are converted to monitoring or supply wells, shall be properly sealed in accordance with the requirements of the Mississippi Department of Environmental Quality, Office of Land and Water Resources.
 - b. Flood control measures as indicated in the application shall be implemented.
 - c. An installation report shall be submitted to the Department for the groundwater monitoring system, to include methodology, well specifications, depths, and surveyed locations.
 - d. Construction quality assurance for the first cell or subcell and any additional cell or subcells shall be submitted to the Department in accordance with the approved plan. The report shall also include field logs, results of testing, surveyed locations, and construction testing methods.
5. The disposal of class I rubbish waste shall be restricted to the approved permitted area consisting of approximately 28 acres.
6. The disposal area is restricted to a maximum side slope of 25% and final cover slope of 4%.
7. Final heights, including final waste height and final cover height, shall be surveyed by a professional land surveyor, registered by the State of Mississippi. The certified survey shall be submitted to the Department.
8. A property line setback of at least 200 feet shall be maintained between the property line and the disposal area.
9. Construction and operation activities of the facility shall be conducted in accordance with state regulations and the approved plans, as submitted to the Department.

F. SITE SPECIFIC OPERATING CONDITIONS

1. The facility shall be operated in accordance with the approved plan of operation, unless an altered or modified plan of operation is approved by the Department.
2. Modification to this permit shall be required prior to a horizontal or

vertical expansion of the facility or a significant change in the method of waste management.

3. This permit is subject to local approvals and in the event the permittee does not maintain local zoning and conditional use required approvals as determined by the DeSoto County Board of Supervisors, this permit may be revoked. On or before May 7, 2019, the permittee shall advise the Department in writing of the status of the efforts of the permittee to extend the DeSoto County conditional use approval beyond the expiration date of July 7, 2019. If the local decision process on conditional use extends beyond the expiration date of July 7, 2019, the permittee shall provide written notice to the Department on or before July 7, 2019, of the permittee's attempts to renew conditional use approval and shall advise the Department of the anticipated schedule for a final decision on conditional use. The permittee shall provide the Department with written notice of the re-issuance or denial of the conditional use within 7 days of the decision.
4. If the permittee executes a contract with a private contractor to operate the facility, the permittee shall comply with the following requirements prior to the private contractor beginning operation of the facility:
 - a. A complete disclosure form for the private contractor shall be submitted and approved as established by state law and regulations, and
 - b. A copy of executed contract between the private contractor and the permittee shall be submitted to and approved by the Department. Any new contract or change in the existing contract concerning operational control of the facility shall be submitted to the Department for approval before execution of the new or modified contract.
5. Security must be maintained at the facility site to prohibit unauthorized access and disposal. Access to the site shall be secured or locked when the site is closed and when no attendant is on site.
6. Vehicles entering the facility shall be operated and maintained to prevent the loss of liquids or solid waste material.
7. The service area of the facility shall be consistent with the service area listed in the approved DeSoto County Solid Waste Management Plan. Solid waste generated by areas not within the approved service area shall be prohibited from disposal, unless specifically approved by the Commission.
8. The permittee shall insure that disposal of waste shall be limited to the following acceptable Class I type rubbish wastes:

- a. natural vegetation, such as tree limbs, stumps, and leaves,
- b. brick, mortar, concrete, stone, and asphalt,
- c. construction and demolition debris, such as wood, metal, etc.,
- d. cardboard boxes,
- e. furniture,
- f. plastic, glass, crockery, and metal, except containers,
- g. sawdust, wood shavings, and wood chips,
- h. appliances (other than refrigerators and air conditioners) which have had the motor removed, and
- i. other similar wastes specifically approved by the Department.

Unless specifically stated in the list above, any industrial solid waste or other waste possessing special characteristics shall be specifically approved by the Department prior to acceptance at the site.

- 9. The permittee shall insure that the following wastes shall be prohibited from disposal:
 - a. any acceptable waste which has been contaminated by a pollutant, such as a food or chemical, unless it can be demonstrated to the satisfaction of the Department that such waste has no adverse effect on the environment,
 - b. household garbage and other food and drink waste,
 - c. liquids, sludges, and contaminated soils,
 - d. paint, paint buckets, oil containers, and chemical containers,
 - e. engines, motors, whole tires, and all types of batteries,
 - f. toxic or hazardous waste,
 - g. regulated asbestos and asbestos containing material originating from a facility, as defined by the National Emission Standards for Hazardous Air Pollutants (40 CFR 61, Subpart M),
 - h. medical waste,
 - i. bulk fabric and paper loads, refrigerators, air conditioners, cut or shredded tires, and any metal, glass, plastic, or paper container, unless specifically approved by the Department.
 - j. The Department shall consider the characteristics of the waste, the operating plan of the site, and other site specific conditions in determining the acceptability of any such waste, and other wastes, which are specifically determined by the Department to, potentially have an adverse effect on the environment.

- k. other wastes that are specifically determined by the Department to have an adverse impact on the environment and human health.
10. Disposal area boundaries shall be clearly marked and maintained throughout the life of the facility. Placement of the permanent boundary markers shall comply with the following:
- a. The markers shall be at least three (3) feet in height;
 - b. The markers shall be constructed of concrete posts, metal pipes, weather treated wood posts, metal fence posts or other marker materials as approved by the Department;
 - c. The markers shall be at least two (2) inches in diameter, with the exception of the metal fence posts and shall be placed in the ground at sufficient depth to facilitate permanence.
 - d. Marker locations shall be verified by a Professional Surveyor, registered with the State of Mississippi, and the certified survey indicating the locations and GPS coordinates of the permanent markers with a cover letter shall be submitted to the Department.
 - e. The permittee shall inspect the boundary markers monthly and repair or replace markers that have been damaged or inadvertently removed from the disposal boundary. Boundary marker replacement shall comply with Condition F.11.d of this permit.
11. The permittee shall insure that incoming and unauthorized waste shall be managed accordingly:
- a. Prior to the unloading and disposal of each waste load, the facility operator or a designated trained spotter shall visually inspect each waste load and remove any unauthorized wastes from the load;
 - b. Incoming waste loads that contain significant amounts of unauthorized wastes shall be refused disposal at the facility;
 - c. Incidental amounts of unauthorized wastes identified after waste unloading shall be immediately removed from the disposal area; and
 - d. All unauthorized wastes removed from incoming loads and/or the disposal area shall be collected and properly disposed at an authorized disposal facility.
12. Wastes enclosed within bags or cardboard boxes shall be subject to random inspections to prevent the disposal of unauthorized wastes within the approved disposal area.
13. An earthen cover of at least six inches or an alternate cover shall be applied to the wastes at least once every 14 days as specified in the approved plan of operation for this facility. Any alternate cover utilized at this facility shall be approved by the Department prior to implementation of the alternate cover. The Department may alter or modify the frequency

of cover depending upon the amount and/or type of wastes received at the facility and any other conditions at the facility that may warrant such action.

14. Unloading and disposal of the rubbish waste shall be controlled by the operator and confined to as small an area as practical, but shall not exceed 0.75 acres unless otherwise approved by the Department.
15. The facility shall be operated by a person who holds a current certificate of competency issued by the Commission on Environmental Quality in accordance with Rule 8.1.B of the Regulations for the Certification of Operators of Solid Waste Disposal facilities. Such person shall have direct supervision over and be personally responsible for the daily operation and maintenance of the facility.
16. The operation of the facility shall be conducted in a manner that minimizes windblown litter and prevents vector attraction. Windblown and scattered litter and/or debris within the buffer zones, facility operations areas, and access roads shall be collected at the end of every operating day and returned to the active disposal area for proper disposal.
17. The permittee shall implement all necessary fire prevention measures as outlined in the approved plan of operation.
18. The permittee shall insure that open burning of solid waste is prohibited. In the event of an accidental fire, the permittee shall implement necessary steps to extinguish the fire and notify the Department within 24 hours.
19. Open burning of land clearing debris generated on site of the facility shall be allowed pending compliance with the following:
 - a. Land clearing debris to be burned shall be staged at least 100 yards from active or filled portions of the disposal area;
 - b. Burning operations shall be conducted in compliance with 11 Miss. Admin. Code Pt. 2, Ch. 1, Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants;
 - c. Burning operations shall be conducted in compliance with all applicable local laws, ordinances, and/or regulations.
20. Rubbish shall not be disposed in standing water, in any waters of the state, nor in any manner that may result in the wash-out of wastes. Furthermore, the site shall be developed and contoured to direct storm water run-off away from the active disposal area and to prevent water from collecting within any filled portion of the disposal area.
21. The permittee shall operate this facility in compliance with all applicable requirements of the U. S. Army Corps of Engineers, the U. S. Fish and

Wildlife Service, and the Mississippi Department of Archives and History.

22. The permittee shall at all times provide, properly operate and maintain equipment and systems utilized to achieve compliance with the conditions of this permit and all applicable laws, ordinances and regulations. The Permittee shall ensure proper training of all facility employees and ensure the employment of an adequate amount of employees required to properly operate the facility.
23. Filled areas of the site which have remaining capacity and which will not receive waste within 30 days shall receive an intermediate cover of twelve inches of earthen cover. An alternate cover system may be approved by the Department.
24. Within 30 days of completing a disposal area, at least two feet of low permeability earthen cover shall be applied as final cover as specified in the approved plan of operation. Following soil placement, suitable vegetation shall be promptly established and maintained. Any erosion occurring on completed disposal areas shall be promptly repaired. Any area where waste has been disposed, which has not received waste in the past 12 months shall be covered in accordance with this paragraph.
25. The permittee shall routinely inspect the condition of weekly, intermediate and final earthen cover during the operation of the facility. Erosion, cracks, ponding, leachate outbreaks and other similar problems shall be promptly repaired.
26. The permittee shall notify the Department in writing upon final closure of the site. Closure of the site shall be certified by a Professional Engineer registered in the State of Mississippi.

G. RECORDKEEPING AND REPORTING REQUIREMENTS

1. The permittee shall submit an annual report to the Department each year no later than February 28, to include information regarding the facility for the preceding calendar year. At a minimum, the report shall contain the following:
 - a. total amount of waste received at the disposal site during the calendar year, in units of tons or cubic yards,
 - b. the sources of waste listed by county or origin with a clear indication of waste originating from out-of-state counties;
 - c. estimated remaining capacity at the facility, in terms of acreage, cubic yards, and years remaining; and
 - d. an updated disclosure statement. If all information from the previously submitted disclosure statement is unchanged, a letter

stating such may be included in lieu of an updated disclosure statement.

2. The permittee shall keep an accurate written daily record of deliveries of solid wastes to the facility including the following:
 - a. The name of the waste hauler;
 - b. The source of the waste;
 - c. The types of waste received;
 - d. The weight of solid waste, measured in tons, received at the facility. Facilities that do not have access to weight scales shall convert to tons from cubic yards using conversion factors as developed or approved by the Department;
 - e. Other information associated with the management of solid waste at the facility as directed by the Department.
3. A copy of these records shall be maintained by the permittee at the rubbish site or at another site approved by the Department. The records shall be made available to the Department for inspection upon request.
4. The permittee shall retain all records associated with the construction and/or operation of the facility for a period not to exceed five years after the approved closure of the facility.

H. OTHER PERMIT REQUIREMENTS

1. The permittee shall conduct groundwater monitoring at the facility in accordance with the approved ground water monitoring plan unless otherwise approved by the Department. Monitoring shall be conducted semiannually, unless otherwise directed by the Department, according to the following schedule.

<u>Monitoring period</u>	<u>Report Due</u>
January - June	August 31
July - December	March 1 (of the following year)

Samples may be taken at any time during the monitoring period; however, all required sampling events (except background) shall be at least four months apart. The following reports and records shall be retained in the operating record, and a copy shall be submitted to the Department according to the schedule above:

- a. The dates, exact location, and time of sampling;

- b. The individual(s) who performed the sampling;
 - c. Results of groundwater level measurements and a map indicating direction of flow;
 - d. The date(s) laboratory analyses were performed;
 - e. The individual(s) who performed the analyses;
 - f. The analytical techniques or methods used;
 - g. The results of such analyses, provided by the laboratory;
 - h. The statistical comparison of historic analyses;
 - i. Determination of statistically significant increases; and
 - j. Chain of custody forms.
- 2. Groundwater assessment monitoring and corrective action, if necessary, shall be conducted at the facility, in accordance with state regulations, this permit, and the approved plan of operation.
 - 3. Groundwater monitoring sampling events shall be conducted in accordance with EPA and state sampling procedures.
 - 4. The Department may modify or otherwise alter the number and type of sampling parameters and/or the sampling frequency based on Departmental review of previously submitted sampling results.