

WASTE MANAGEMENT OF MISSISSIPPI INC.

Prairie Bluff Sanitary Landfill and Recycling Center 1649 Hwy 15 North Houston, MS 38851

January 19, 2017

FedEx Tracking # 778217857980

Chris Sanders, Director MDEQ-OPC 515 E. Amite Street Jackson, MS 39201-8960

RE: Notice of Potential Asbestos Disturbance

Asbestos Management - 40 CFR 61.154 (j)
Installation of Landfill Gas Management System Expansion

Prairie Bluff Landfill, Houston, Chickasaw County, Mississippi

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Dept. of Environmental Quality

Dear Mr. Sanders:

Waste Management of Mississippi Inc. (WMMI) is submitting this notification as required per 40 CFR 61.154(j) and Title V Permit 0380-00039 for expansion of the landfill gas extraction system at the Prairie Bluff Landfill Sanitary Landfill and Recycling Center (PBSLRC) in Houston, Mississippi. This correspondence serves to notify the Department at least 45 working days before the start of construction activities into areas where asbestos materials may be disturbed, and identifies an estimated start date and completion date. Due to an expedited project schedule, the required 45-day prior notice is not being provided; however, as much advance notice as possible has been provided.

PBSLRC is preparing to construct an expansion of its landfill gas collection system beginning in mid-February 2017 that will extend to December 2017. As part of this project, vertical gas wells will be installed into the waste mass and may affect areas of deposited asbestos material. Well locations have been adjusted from the initial design plan in order to avoid known asbestos locations; however, some areas of asbestos may be impacted.

PBSLRC will be subcontracting the construction of the landfill gas collection system to a qualified landfill gas contractor. This contractor will be responsible for making certain the contractor's internal Health and Safety Plan (HASP) is followed as well as the procedures detailed in the facility's Asbestos Management Plan and its Solid Waste Permit.

As required by the above referenced federal standard, the following procedures will be taken to protect both construction personnel and the environment from asbestos exposure.

- 1. The contractor personnel will be trained and qualified to work in an asbestos environment. The contractor's project specific Health and Safety Plan will identify procedures that will be followed in the event that asbestos is encountered. If asbestos is encountered, contractor and site operations personnel within 50 feet of the drilling/digging activities must wear an NIOSH approved respirator; in addition, contractor personnel shall also wear disposable coveralls with a hood, gloves, and foot covering.
- The contractor will immediately inform the operations supervisor or manager if asbestos waste is uncovered. Once this notification has been received, Operations will prepare a trench

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adjacent to the active face. The asbestos waste will be hauled from the project location to the prepared trench. Upon disposal of the asbestos within the active disposal area of the landfill, operations personnel will immediately backfill the trench with municipal refuse or soil materials. Emissions will be controlled through the means of careful observation, covering asbestos containing materials during transport to the active disposal area and, if necessary, using a water misting unit at the excavation area.

Consistent with other accepted asbestos loads, operations will record the position of the relocated waste.

Once again, we do not expect asbestos to be disturbed during this construction event; however, in the event asbestos is impacted, the above procedures will be followed. If you have any questions or require additional information related to this submittal, please feel free to call the undersigned at (813) 786-6807, or contact me via email at <a href="mailto:mlersch@wm.com">mlersch@wm.com</a>.

Sincerely,

Michele Lersch

Market Area Environmental Manager

cc: Regional Asbestos NESHAP Coordinator, U.S. EPA-Region 4
(via FedEx, tracking #78217966304)
Mark Noel, WM Senior Environmental Manager
Rob Iversen, WM Area Gas Operations Manager
Lance Sanders, WM District Manager

Site File

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