

Chambers Clearview Environmental Landfill, Inc. 2253 Mudline Road Lake, MS 39092

January 24, 2018

FedEx Tracking # 771311581174

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 Exp

Installation of Landfill Gas Management System Expansion Clearview Landfill, Lake, Scott County, Mississippi RECEIVED

Dept. of Environmental Quality

Dear Mr. Sanders:

Chambers Clearview Environmental Landfill, Inc. is submitting this notification as required per 40 CFR 61.154(j) and Title V Permit 2420-00046 for expansion of the landfill gas extraction system at the Clearview Environmental Control Facility Landfill (Clearview LF) in Lake, Mississippi. This correspondence serves to notify the Department 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.

Clearview LF has begun constructing an expansion of its landfill gas collection system as of the date of this notice that is expected to extend through December 2018. As part of this project, invasive digging into the waste mass with possible installation of vertical gas wells may affect areas of deposited asbestos material. As necessary, well locations may be adjusted from the initial design plan in order to avoid known asbestos locations; however, some areas of asbestos may be impacted.

Clearview LF 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

NESHAP Notification Clearview LF Page 2 January 24, 2018

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 mlersch@wm.com.

Sincerely,

Michele Lersch

Area Environmental Manager

Michele H. Levich

cc: Rob Iversen, WM Area Gas Operations Manager

Lance Sanders, WM District Manager

Site File

Regional Asbestos NESHAP Coordinator, U.S. EPA-Region 4 (via FedEx,

tracking # 771311021495)