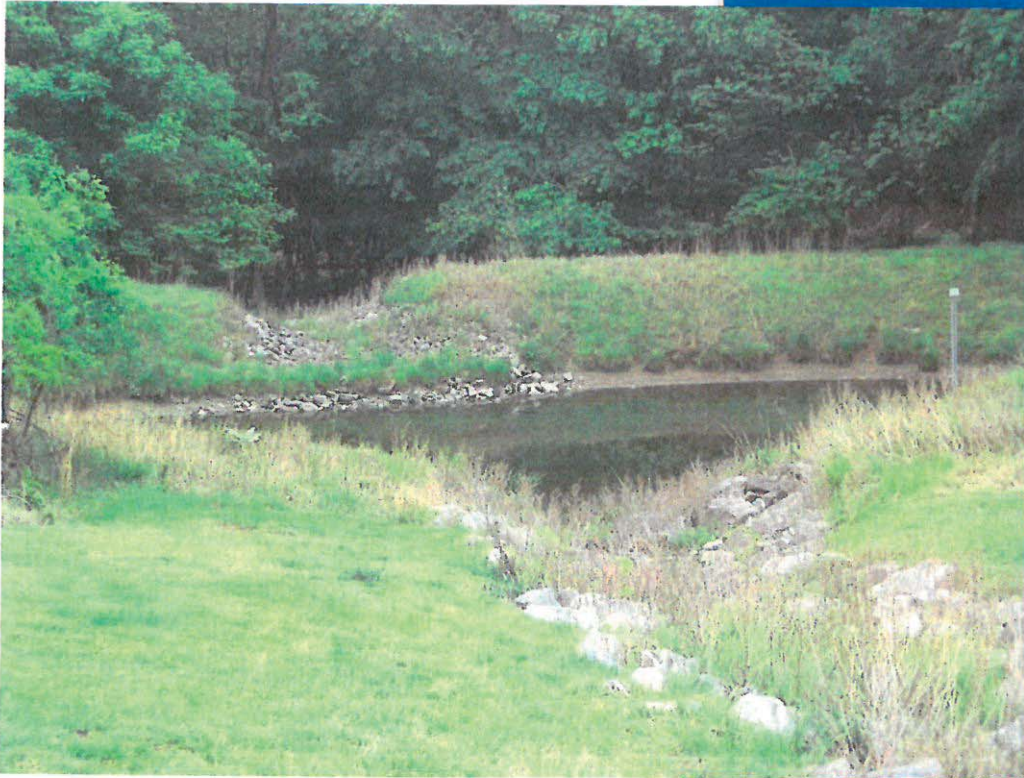


**Stormwater
Pollution Prevention Plan
Millersville Landfill and
Resource Recovery Facility
Anne Arundel County, MD**



KCI Project 17110671.04



KCI Technologies, Inc.
January 2014





MARYLAND DEPARTMENT OF THE ENVIRONMENT

1800 Washington Boulevard • Baltimore MD 21230

410-537-3000 • 1-800-633-6101 • www.mde.maryland.gov

Martin O'Malley
Governor

Anthony G. Brown
Lieutenant Governor

Robert M. Summers, Ph.D.
Secretary

August 15, 2014

CHANDRA CHITHALURU
ENVIRONMENTAL MANAGER
ANNE ARUNDEL COUNTY DEPT. OF PUBLIC WORKS
389 BURNS CROSSING ROAD
SEVERN, MD 21144

Re: Registration of Application Number: 12SW0298; NPDES Number: MDR000298

Dear CHANDRA CHITHALURU:

This letter will serve as notification that your NOI has been accepted for registration under the General Discharge Permit for Storm Water Associated with Industrial Activities, Permit No. 12SW for stormwater discharges into the **Baltimore Harbor-02130903**. Keep this for your records and provide it to your local jurisdiction as required by the permit. A copy of the permit and this letter should also be kept with your SWPPP onsite. The permit may be printed from MDE's website or from this link http://bit.ly/MDE_industrial_stormwater.

In signing the NOI and providing your updated SWPPP you have certified your agreement to comply with the terms of this permit for the **151** acre facility **Northern Recycling Center**, located at **100 Dover Rd, Glen Burnie, MD 21061**. Your facility's permit coverage is identified by Registration Number **12SW0298**. This coverage will continue until December 31, 2018, or as extended, under the terms of the 12-SW permit.

You should thoroughly review the permit to make sure you are always in compliance with its requirements. Those requirements include, but are not limited to, selecting and implementing the specific control measure for your industry, performing quarterly visual monitoring requirements, performing the annual Comprehensive Site Compliance Evaluations. The permit also has triggers and requirements for corrective actions.

Your facility discharges into a watershed which is impaired for the following categories: Bacteria, Biological, Metals, Nutrients, PCBs, Pesticides and Sediments. Based on this status you must evaluate your control measures to ensure you are minimizing your facility discharges relating to these impairments during each annual comprehensive site compliance evaluation. See Part V.A.2 of the permit.

Your facility is subject to the required Benchmark Monitoring in the permit. You will need to report the Benchmarks for the Subsector L1 Landfill or Land Application Site industry sector(s) quarterly until the requirements of the permit are met. See Part V.B of the permit. Reporting is done on-line with NetDMR. You will need to apply for access to NetDMR within one month, and begin reporting your monitoring results as required by the permit. A brochure about NetDMR and how to register is enclosed. If you have any questions about NetDMR please contact the Department at 410-537-3514. Enclosed is also a copy of the Federal Register, Part 136-- 'Guidelines Establishing Test Procedures for Analysis of Pollutants'. The most recent version of Title 40CFR, Part 136 can be found online at www.ecfr.gpoaccess.gov. Unless otherwise



Recycled Paper

www.mde.maryland.gov

TTY Users 1-800-735-2258
Via Maryland Relay Service

Re: Registration of Application Number: 12SW0298; NPDES Number: MDR000298
Page 2 of 2

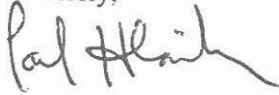
specified, these guidelines are to be used for the analyses required by this permit.

Please direct all future correspondence regarding permit compliance to the following address:

Maryland Department of the Environment
1800 Washington Boulevard
Compliance Program, Suite 420
Baltimore, Maryland 21230-1708
(410) 537-3557 (410) 537-3573 FAX

If you have any questions, please do not hesitate to contact the Industrial and General Permits Division at 410-537-3323.

Sincerely,



Paul Hlavinka
Regulatory Compliance Engineer
Industrial and General Permits Division
Water Management Administration

PH/ba

cc: Dave Lyons, WMA, Compliance Program (Anne Arundel)
Sharon Talley, WMA, Compliance Program (Anne Arundel)
Bill Lee WMA, WMA, Compliance Program (Anne Arundel)

INSPECTION
COMPLETED 11/8/17

**Appendix H:
Completed Annual Compliance Worksheets**

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: MILLERSVILLE LANDFILL & RESOURCE RECOVERY FACILITY AND CENTRAL RECYCLING CENTER

2. NPDES Permit Tracking No.: REGISTRATION # 12SW1304
NPDES # MDR001304

3. Facility Physical Address: 389 Burns Crossing Road, Severn, MD 21144

a. Street: Burns Crossing Road

b. City: Severn

c. State: MD d. Zip Code: 21144

4. Lead Inspectors Name: Mark Morris

Title: Environmental Monitoring Manager

Additional Inspectors Name(s): Steve Krajcsik, Michael Gravatt, Michael Lunghi, Mike Zimhelt,
Tim Richards, Jonathan Rossetti, Orlando Powell

5. Contact Person: Mark Morris

Title: Environmental Monitoring Manager

Phone: 410-222-6108

Ext. 3715

E-mail: pwmorr12@aacounty.org

6. Inspection Date: November 8, 2017 11 a.m. to 3:00 p.m.

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
 YES NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? YES NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place.

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? YES NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? YES NO NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

None observed and condition of and around outfalls was in good condition.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

YES NO See attached Fourth Quarter Inspection for details.

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

2

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA: Recycling Center and Leachate Pretreatment Areas

1. Brief Description:

Recycling Center allows citizens to drop off recyclables in specific containers.
 Leachate Pretreatment area consists of leachate storage tanks and pretreatment building.

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised control measures necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form): See attached Fourth Quarter Inspection for details.

INDUSTRIAL ACTIVITY AREA: Maintenance Shop and Warehouse

1. Brief Description:

Maintenance Shop is a typical mechanic shop. No discharges are allowed to leave the shop. Shop is equipped with oil water separator.
 Warehouse is a storage area. Enclosed building and no discharges.

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised c necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA: Fueling Facility

Brief Description:

Fueling facility consists of diesel and gasoline USTs and dispensers for use by county personnel.

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA: Landfill Closed Cells and Composting Areas

1. Brief Description:
 MLFRRF has four (4) closed cells, closed per 40 CFR 258 requirements in mid-1990s.
 Composting area closed Cell #1 is a paved area to compost leaves and grass.

- 2. Are any control measures in need of maintenance or repair? YES NO
- 3. Have any control measures failed and require replacement? YES NO
- 4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form): See attached Fourth Quarter Inspection for details.

INDUSTRIAL ACTIVITY AREA: Landfill Active Cell #8 and New Active Cell #9

1. Brief Description:
 Cell #8 is under active construction to cap and close.
 Cell #9 (Subcell 9-1) is an active solid waste disposal cell and other parts of Cell 9 are a soil borrow area for the capping and closure of Cell #8.

- 2. Are any control measures in need of maintenance or repair? YES NO
- 3. Have any control measures failed and require replacement? YES NO
- 4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form): See attached Fourth Quarter Inspection for details.

INDUSTRIAL ACTIVITY AREA _____ :

1. Brief Description:

- 2. Are any control measures in need of maintenance or repair? YES NO
- 3. Have any control measures failed and require replacement? YES NO
- 4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action #

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 for this reporting period.

2. Is this corrective action:

- An update on a corrective action from a previous annual report, or
- A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- Unauthorized release or discharge
- Numeric effluent limitation exceedance
- Control measures inadequate to meet applicable water quality standards
- Control measures inadequate to meet non-numeric effluent limitations
- Control measures not properly operated or maintained
- Change in facility operations necessitated change in control measures
- Average benchmark value exceedance
- Other (describe): Routine woody vegetation removal from rip rap ditches in early winter or spring.

4. Briefly describe the nature of the problem identified:

5. Date problem identified:

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6. How problem was identified:

- Comprehensive site inspection
- Quarterly visual assessment
- Routine facility inspection
- Benchmark monitoring
- Notification by EPA or State or local authorities
- Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:
See attached Fourth Quarter Inspection for details.

8. Did/will this corrective action require modification of your SWPPP? YES NO

9. Date corrective action initiated:

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10. Date correction action completed:

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 or expected to be completed:

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11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action: See attached Fourth Quarter Inspection for details.

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? YES NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

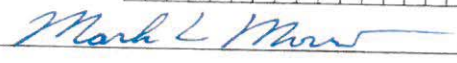
Authorized Representative
Printed Name:

MARK MORRIS

Title:

ENV. MONITORING MANG.

Signature:



Date Signed:

11/9/17

INSPECTION
COMPLETED 11/21/14

**Appendix H:
Completed Annual Compliance Worksheets**

NPDES Permit Tracking No.:
| | | | | | | | | | | |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: MILLERSVILLE LANDFILL & RESOURCE RECOVERY FACILITY AND CENTRAL RECYCLING CENTER

2. NPDES Permit Tracking No.: REGISTRATION # 12SW1304
NPDES # MDR001304

3. Facility Physical Address: 389 Burns Crossing Road, Severn, MD 21144

a. Street: Burns Crossing Road

b. City: Severn

c. State: MD d. Zip Code: 21144

4. Lead Inspectors Name: Chandra Chithaluru

Title: Environmental Monitoring Manager

Additional Inspectors Name(s): Eric Pindell, Michael Lunghi

5. Contact Person: Mark Morris

Title: Environmental Monitoring Manager

Phone: 410-222-6108

Ext. 3715

E-mail: Pwmorr12@aacounty.org

6. Inspection Date: November 21, 2016 1 p.m. to 2:30 p.m.

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
 YES NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? YES NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? YES NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? YES NO NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

None observed and condition of and around outfalls was in good condition.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

YES NO Routine woody vegetation removal to be completed in fiscal year 2017.

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions?

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NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

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C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA: Recycling Center and Leachate Pretreatment Areas
1. Brief Description:

Recycling Center allows citizens to drop off recyclables in specific containers.
Leachate Pretreatment area consists of leachate storage tanks and pretreatment building.

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised control measures necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA: Maintenance Shop and Warehouse
1. Brief Description:

Maintenance Shop is a typical mechanic shop. No discharges are allowed to leave the shop. Shop is equipped with oil water separator.
Warehouse is a storage area. Enclosed building and no discharges.

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised c necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA: Fueling Facility
Brief Description:

Fueling facility consists of diesel and gasoline USTs and dispensers for use by county personnel.

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

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NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA: Landfill Closed Cells and Composting Areas

1. Brief Description:

MLFRRF has four (4) closed cells, closed per 40 CFR 258 requirements in mid-1990s.
Composting area closed Cell #1 is a paved area to compost leaves and grass.

- 2. Are any control measures in need of maintenance or repair? YES NO
- 3. Have any control measures failed and require replacement? YES NO
- 4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA: Landfill Active Cell #8 and New Active Cell #9

1. Brief Description:

Cell #8 is an active solid waste disposal cell and is under active construction to cap and close.
Cell #9 (Subcell 9-1) is an active solid waste disposal cell and soil borrow area for the capping and closure of Cell #8.

- 2. Are any control measures in need of maintenance or repair? YES NO
- 3. Have any control measures failed and require replacement? YES NO
- 4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

- 2. Are any control measures in need of maintenance or repair? YES NO
- 3. Have any control measures failed and require replacement? YES NO
- 4. Are any additional/revised BMPs necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action #

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 for this reporting period.

2. Is this corrective action:

- An update on a corrective action from a previous annual report; or
- A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- Unauthorized release or discharge
- Numeric effluent limitation exceedance
- Control measures inadequate to meet applicable water quality standards
- Control measures inadequate to meet non-numeric effluent limitations
- Control measures not properly operated or maintained
- Change in facility operations necessitated change in control measures
- Average benchmark value exceedance
- Other (describe): Routine woody vegetation removal from rip rap ditches in early winter or spring.

4. Briefly describe the nature of the problem identified:

5. Date problem identified:

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6. How problem was identified:

- Comprehensive site inspection
- Quarterly visual assessment
- Routine facility inspection
- Benchmark monitoring
- Notification by EPA or State or local authorities
- Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Routine woody vegetation removal from rip rap ditches in early winter or spring.

8. Did/will this corrective action require modification of your SWPPP? YES NO

9. Date corrective action initiated:

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10. Date correction action completed:

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 or expected to be completed:

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11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? YES NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative
Printed Name:

CHANDRA CHITHALURU

Title:

ENV. MONITORING MANG.

Signature:

Mark Moran for

Date Signed:

8/24/17



M A R Y L A N D

Department of Public Works

Bureau of Waste Management Services
389 Burns Crossing Road
Severn, MD 21144

August 25, 2017

Ms. Tammy Roberson, Acting District Manager
Water Management Administration Compliance Program
Maryland Department of the Environment
1800 Washington Blvd., Suite 420
Baltimore, MD 21230-1718

**RE: Maryland Department of the Environment Stormwater Inspection for
Millersville Landfill and Resource Recovery Facility (NPDES Permit No.
12SW1304)**

Dear Ms. Roberson:

We would like to thank you for the professional manner in which you conducted the stormwater inspection at our Millersville Landfill and Resource Recovery Facility (MLFRRF) on August 16, 2017. I want to personally assure you and the senior management at the Maryland Department of the Environment (MDE) that we will make every effort to ensure full compliance with our stormwater permit and continue to operate the MLFRRF as the model facility that it has come to represent in the Mid-Atlantic Region. We have provided a response to each of the issues identified in your inspection report (AI ID: 19044) as areas of noncompliance, and offer the steps that we are taking to remedy them in the remainder of this letter.

Stormwater Pollution Prevention Plan (SWPPP)

We acknowledge that the SWPPP for the MLFRRF has not been updated in over two years. Mark Morris, our new Environmental Monitoring Manager, has reviewed the document several times since coming aboard in mid-June but had not officially revised it. Because the revised SWPPP is currently moving through our signature chain we have enclosed a draft of the revised copy for your records (See Exhibit 1).

Comprehensive Site Compliance Evaluation

Unfortunately electronic and other records from our previous Environmental Monitoring Manager (Mr. Chandra Chithaluru) are not as well organized as we would hope. Mr.

Page 2
Ms. Tammy Roberson
Stormwater Inspection
August 25, 2017

Chithaluru left County service during 2017. As such, we were unable to provide documentation for the annual comprehensive site compliance evaluation that was conducted in November 2016. Upon further review, we were able to find records showing that Mr. Chithaluru had conducted monthly compliance inspections at each of our facilities including the MLFRRF for the entire 2016 calendar year and that he had prepared written reports documenting his inspections. In addition, a review of the calendars for the SWPPP Team members showed that an annual comprehensive site compliance evaluation for the MLFRRF was held on Monday, November 21, 2016, but regrettably, we have been unable to find the report at this time. As a result, Mr. Morris has reviewed each of the monthly site inspection reports, has spoken with Mr. Chithaluru to confirm the annual comprehensive site compliance inspection was completed on November 21, 2016, and has interviewed the SWPPP Team members that were present at the annual inspection. Based on his review, Mark has prepared and signed the annual comprehensive site compliance evaluation for the November 21, 2016, inspection. A copy of this report and the records supporting it are enclosed for your review (See Exhibit 2). In addition, the SWPPP Team members will be conducting the 2017 annual comprehensive site compliance evaluation for each of our facilities before the end of the calendar year.

Quarterly Visual Inspections

The form that we have used for our Quarterly Visual Inspections has been in place since January of 2003 (last revision 2008) (See Exhibit 3). As such, we have logged over 14 years of visual inspections that were contained in the notebook that we provided to you the day of your inspection. You informed us that the form was not acceptable for this purpose and the correct form must be taken from Appendix B of the permit. Even as recently as October 28, 2014, when MDE conducted a stormwater investigation that consisted of a records review and a site inspection, it was determined "that no violations were present and the site is considered satisfactory and compliant", and no mention was made concerning this form. Nevertheless, from this point forward we will be using the Quarterly Visual Inspection form from our approved SWPPP. A copy of this new form is already being used by our environmental technicians and is attached for your review (See Exhibit 4).

Industry Specific Benchmarks Monitoring Requirements

Since his arrival, Mr. Morris has been actively working towards the goal of conducting benchmark monitoring for our facilities. He has been given signatory authority under the County Executive's amended Executive Order 4 to enter the data into NetDMR for the Bureau of Waste Management Services, and has registered with NetDMR as the signatory for our facilities. In addition, he has tasked our contractor (Environmental Monitoring and Assessment, LLC) to instruct our environmental technicians on proper sampling procedures and laboratory protocols for benchmark sampling and analysis. As of this

Page 3
Ms. Tammy Roberson
Stormwater Inspection
August 25, 2017

letter, our environmental technicians have collected stormwater samples for benchmark parameter analysis from our ponds. Once we receive the laboratory results, Mr. Morris will enter the data into NetDMR.

Enhanced BMPs Addressing Stormwater Discharges from Ponds 8 and 9

During most of the year, many of our ponds have not been discharging stormwater and the best management practices (BMPs) currently implemented remain adequate as evidenced by the October 28, 2014, site investigation performed by MDE. However, due to the active construction around Ponds 8 and 9 related to the closure of Cell 8 following the approved closure plan, along with the heavy rain events in late July and early August (greater than 9.5 inches of rain over the past 30 days) we agree that additional housekeeping and BMPs are needed as part of the ongoing construction project. Housekeeping items being implemented since the last rain event include:

1. Scrape and remove loose sediment deposits from perimeter haul roads around Cell 8 and the Cell 9 borrow area, and mechanically sweep roads.
2. Scrape accumulated sediment from perimeter access road around the Cell 9 borrow area down to asphalt millings or rubble base. Add additional asphalt millings where needed.
3. Extend silt fence at northeast corner of Cell 9 borrow area.
4. Reduce the amount of heavy equipment entrances to Cell 9 borrow area.
5. Remove accumulated sediment from the Cell 8 perimeter stormwater channel and Cell 9 borrow area stormwater channels. This sandy soil material with a clayey fraction, the result of recent severe storms impacting the 18 inch soil cover layer in the composite capping system, is a significant contributor of sediment to Pond 8.
6. Stabilize all completed Cell 9 borrow area side slopes (grade areas, place topsoil, apply seed and mulch).
7. Continue to stabilize completed areas of the Cell 8 capping system in accordance with the approved closure plan.
8. Continue to stabilize completed areas of Cell 8 landfilling operation as the closure cap construction proceeds from east to west in the 54-acre Cell 8 footprint.

In addition to housekeeping, we are pursuing the following enhanced BMPs to address stormwater discharges:

1. Add additional sediment floc logs to the perimeter stormwater channels around Cell 8 and Cell 9.
2. Review Cell 8 closure sequence of construction and complete perimeter berm areas, as allowed.
3. Evaluate undisturbed sections of the southern perimeter stormwater channel around Cell 8 for use in "recirculating" stormwater across a series of floc logs to promote sedimentation.
4. Investigate sediment buildup in Pond 8 to determine if it needs to be dredged to garner

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- storage capacity.
5. Repair small breach in Pond 8 cross dike.
 6. Remove accumulated sediment from Pond 8 cross dike geotextile.
 7. Replace geotextile around Pond 8 draw-down devices.
 8. Employ a mobile commercial on-site treatment system (e.g., Rain For Rent) to treat stormwater in Pond 8 (and Pond 9, if necessary) to benchmark limits before discharging to Wells Branch. We will be sending you additional engineering and design specifications concerning this item in a follow-up letter.

Again, I want to thank you for your help in this process and the collaborative manner in which you have been operating as we work to address these issues. Should you have any questions regarding the information covered in this letter or require additional information, please contact me or Mark Morris on (410) 222-6108.

Sincerely,



Stephen J. Krajcsik, P.E.
Solid Waste Operations Administrator

Enclosures

cc: Paul Hlvinka
Jennifer Nitsch
Mark Morris
Thomas Reilly

Recycled Paper

Phone 410-222-6108 MS 4190 Fax 410-222-6105

<http://www.aacounty.org/departments/public-works/waste-management/>

**Appendix E:
Schedule of Employee Training**

Appendix E Central Recycling Center Employee Training

Type	Topic	Proposed Date	Actual Date
Hazardous Waste Operations (Response)	Review handling, storage, and transportation of hazardous materials, manifesting and reporting, and spill response procedures.		
Good Housekeeping and Spill Prevention	Review the use of absorbent materials. Review good housekeeping practices.		
Preventive Maintenance for Sediment and Erosion Control (stabilized areas)	Discuss and review preventive maintenance measures, case reviews, and practices and procedures.		
Loading and Unloading Procedures	Discuss fuel transfer and material handling procedures		
Stormwater Runoff Control	Discuss maintenance of existing controls and review pollution prevention measures. Discuss composting operations.		
Other SWP3 Topics	Review and discuss components and goals of SWPP plan. Review and discuss record keeping and reporting, tracking, and follow-up program.		

ATTENDEES:

Attendees include PPT Members, Facility Operations and Maintenance Staff, as appropriate

Completed attendance sheets covering each training session listed above are to be inserted behind this summary sheet.



Completed Training (Grouped by Course)

Filter: Begin: 6/1/2017, End: 8/27/2017, Course: 12-Solid Waste Permit-SWPPP Training (CRS0001191)

Course Title: 12-Solid Waste Permit-SWPPP Training

Course Number: CRS0001191

Trained Date	Personnel Name	Group	Score	Credits	Hours
6/26/2017	Boehm, Robert	4310 - Equipment Maintenance			1
6/26/2017	Cluney, Timothy	4337 - Special Collections			1
6/26/2017	Gravatt, Michael	4312 - Disposal & Maintenance			1
6/26/2017	Grayson-Evans, Anita	4337 - Special Collections			1
6/26/2017	Krajcsik, Stephen	4303 - Administration Division			1
6/26/2017	Lunghi, Michael	4312 - Disposal & Maintenance			1
6/26/2017	Morris, Mark	4312 - Disposal & Maintenance			1
6/26/2017	Richards, Timothy	4312 - Disposal & Maintenance			1

Group Record Count: 8

Group Summary: 8

Report Record Count: 8

Report Summary: 8

Training Transcript



Filter: Begin: 1/1/2017, End: 10/19/2017, Group: 4312 - Disposal & Maintenance + Subgroups

Name: Lunghi, Michael (16950)
 Supervisor: Zirnheft, Michael
 Group: 4312 - Disposal & Maintenance
 Job Role(s): Environmental Technician

		Completed							
Course Title	Course Number	Version	Status	Begin Date	Trained Date	Score	Credits	Hours	
Spotter Safety	CRS0001069	2	Completed	10/18/2017	10/18/2017			0	
Hazwoper Refresher 8.0 Hr.	CRS0001167	1	Completed	9/15/2017	9/15/2017			8	
Preventing Landfill Fires	CRS0001383	1	Completed	7/19/2017	7/19/2017			1	
Hot Weather Conditions	CRS0001262	1	Completed	6/14/2017	6/14/2017			0.5	
MCET - Basic Concept of Wastewater	CRS0001323	1	Completed	6/13/2017	6/13/2017			8	
P&P DPW D-06 - Dozer Safety Training	CRS0001179	1	Completed	5/24/2017	5/24/2017			0.5	
Dust Control	CRS0001361	1	Completed	4/26/2017	4/26/2017			0	
Spotter Safety	CRS0001069	2	Completed	3/21/2017	3/21/2017			1	
High Winds	CRS0001222	1	Completed	2/15/2017	2/15/2017			0.5	
High Winds	CRS0001222	1	Completed	1/25/2017	1/25/2017			0.5	
Google Drive Training	CRS0001270	1	Completed	1/10/2017	1/10/2017			0	
								Total:	20

		Enrolled							
Course Title	Course Number	Version	Status	Begin Date	Trained Date	Score	Credits	Hours	
4312 - Millersville Landfill	CRS0001286	1	Enrolled	2/16/2017				0	
								Total:	0