



Bureau of Waste Management Services
389 Burns Crossing Road
Severn, Maryland 21144
Phone (410) 222-6108

July 16, 2019

Ms. Marjorie Newbourn, Project Manager
Industrial and General Permits Division
Maryland Department of the Environment
1800 Washington Blvd., Suite 455
Baltimore, Maryland 21230-1720

RE: Updated Notice of Intent (NOI) and Stormwater Pollution Prevent Plan (SWPPP) to Add Composting Operation under the Standard Industrial Classification (SIC) Code 2499 for the Millersville Landfill and Resource Recovery Facility (Permit Number 12SW-1304)

Dear Ms. Newbourn:

Enclosed, please find the updated NOI and SWPPP for the MLFRRF (Permit #: 12SW-1304). The NOI and SWPPP were updated to add Sector A (Timber Products), SIC Code 2499 (Wood Products, Not Elsewhere Classified) for the composting operation at this facility. The Maryland Department of the Environment Water and Science Administration, Compliance Program requested these changes be made as part of a Stormwater Inspection and Compliance Report conducted on June 25, 2019, by Ms. Wendy Huang and Kari Hanson. Enclosed is a copy of their compliance report and our response.

The updated SWPPP was signed by Chris Phipps, Anne Arundel County's Director of Public Works on July 15, 2019. Per our conversation on Tuesday, July 2, 2019, just the revised pages of the SWPPP along with the signature page for Chris Phipps are enclosed. Should you have any questions or require additional information, please contact me on (443) 623-0605.

Sincerely,

A handwritten signature in blue ink that reads "Mark Morris".

Mark Morris
Environmental Monitoring Manager
Bureau of Waste Management Services

Enclosures

MARYLAND DEPARTMENT OF THE ENVIRONMENT
GENERAL PERMIT Number 12-SW for DISCHARGES from
STORMWATER associated with INDUSTRIAL ACTIVITIES
Notice of Intent (NOI) for Permit No. 12-SW

DISCHARGE PERMIT NO. 12-SW

NPDES PERMIT NO. MDR000000

Submission of this NOI constitutes notice that the party identified in Section I of this form intends to be authorized by a State/ National Pollutant Discharge Elimination System (NPDES) permit issued for discharges from stormwater associated with industrial activities identified in Section II of this form. All information requested must be provided in order to be considered for authorization to discharge under this permit. Instructions are provided at the end of this form.

SECTION I: Facility Operator Information			
(A) Owner/Operator Name			
Anne Arundel County - Department of Public Works - Bureau of Waste Management Services			
(B) Primary Contact Name		Title	
Mark Morris		Environmental Monitoring Manager	
Telephone Number		Email Address	
443-623-0605		pwmorr12@aacounty.org	
(C) Mailing Address			
389 Burns Crossing Road			
City	State	ZIP Code	
Severn	MD	21144	
(D) IRS Employer Identification Number (EIN)		(E) Check Below	
52-6000-878		<input type="checkbox"/> Private	<input type="checkbox"/> Federal
		<input checked="" type="checkbox"/> State/Local	
SECTION II: Facility Information			
(F) Name of Facility			
Millersville Landfill and Resource Recovery Facility			
(G) Facility Address (if different than your mailing address)			
389 Burns Crossing Road			
City	State	ZIP Code	County
Severn	MD	21144	Anne Arundel
(H)		<i>Insurance Company Name</i>	<i>Policy Number</i>
Worker's Compensation Insurance	Self Insured		11339 (See Attached Letter)
Identify number of above ground storage tanks at your facility	10	Total volume (in gallons) of above ground storage tanks	*

* Five (5) 275 Gallon Used Oil, One (1) 275 Gallon Motor Oil, One (1) 275 Gallon Hydraulic Oil, Two (2) 175 Gallon Used Cooking Oil, and One (1) 175 Gallon Used Antifreeze.

MARYLAND DEPARTMENT OF THE ENVIRONMENT
NOI for Permit No. 12-SW

SECTION II (continued): Facility Information

(I) Provide the primary four-digit SIC code that best represents the principal products or activities provided by the facility, and any co-located SIC codes.

Primary SIC: 4953	Co-located SICs: 5093, 2499,	Description of your primary industrial activity: Municipal Solid Waste Landfill & Source-Separated Recycling Facility
(J) Latitude 76.6675 (in degrees decimal)	Longitude 39.0944 (in degrees decimal)	(K) <input type="checkbox"/> Check here if you a new discharger. If not a new discharger, provide the previous registration (e.g., 02SW1234) 12SW-1304
(L) Total property size 565 (in acres)	(M) <input type="checkbox"/> Check if your facility is inactive and unstaffed.	

(N) Identify the 8 digit identifier(s) and name(s) of the receiving water(s).
 02131002 , Severn River Tidal

Identify if any of the receiving water(s) are listed as high quality (Tier 2)

Identify if any of these impairments have been identified for the receiving water(s). (Category 4a, 4b, 4c, or 5 waterbodies)	<input type="checkbox"/> Bacteria	<input type="checkbox"/> Pesticides
	<input checked="" type="checkbox"/> Biological	<input type="checkbox"/> pH
	<input type="checkbox"/> Ions	<input type="checkbox"/> Stream Modifications
	<input type="checkbox"/> Metals	<input checked="" type="checkbox"/> Sediments
	<input checked="" type="checkbox"/> Nutrients	<input type="checkbox"/> Toxics
	<input checked="" type="checkbox"/> PCBs	<input type="checkbox"/> Trash

Identify your local MS4 jurisdiction or N/A if your facility is not within an MS4: Anne Arundel County MS-4

SECTION III: Stormwater Pollution Prevention Plan (SWPPP) and Monitoring

The 12SW permit does require you evaluate and implement specific control measures and effluent limits. It requires you to perform quarterly visual monitoring, may include numeric limits in certain watersheds, and benchmark monitoring and reporting for specific industrial sectors. It requires you to update your SWPPP to encompass the new controls required and provide this in conjunction with your NOI, and then keep an updated SWPPP onsite.

(O) Stormwater Pollution Prevention Plan (SWPPP) Primary Contact

Name	Mark Morris	
Telephone Number	Email Address	SWPPP Provided (URL, email, etc)
443-623-0605	pwmorr12@aacounty.org	Undergoing Revision (See Cover Letter)

(P) Select all the sector's benchmark and electronic reporting that apply to your operations.

- None
- Subsector C1 (Agricultural Chemicals for SIC 2873-2879)
- Subsector C2 (Industrial Inorganic Chemicals for SIC 2812-2819)
- Subsector C3 (Soaps, Detergents, Cosmetics and Perfumes for SIC 2841 – 2844)
- Subsector L1 – Landfill or Land Application Site with refuse disposal or marginal land permit
- Subsector L2 – Landfill or Land Application Site with refuse disposal or marginal land permit, except MSWLF Areas Closed in Accordance with 40 CFR 258.60
- Sector M - Automobile Salvage Yards
- Subsector N1 - Scrap Recycling and Waste Recycling Facility not Source-Separated Recycling
- Subsector U1 - Grain Mill Products (SIC 2041-2048)
- Subsector U2 - Fats and Oils Products (SIC 2074-2079)
- Sector AA - Fabricated Metal Products

MARYLAND DEPARTMENT OF THE ENVIRONMENT
NOI for Permit No. 12-SW

<input type="checkbox"/>	(Q) Check here if your facility is subject to the Chesapeake Bay Restoration Requirements.
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(R) If you are subject to Chesapeake Bay Restoration Requirements, provide these 3 values:	
Total impervious surface area (square feet)	<input type="text"/>
Untreated impervious surface area (in square feet)	<input type="text"/>
Impervious surface area subject to 20% restoration requirement (in acres)	<input type="text"/>

SECTION IV: Permit Fee Selection

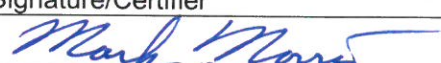
<u>Annual Payment</u> – Select this fee structure if you prefer to pay annually. The first \$120 annual payment shall be submitted with this NOI and then paid annually by July 1 thereafter.	\$120	<input type="checkbox"/>
<u>One-Time Payment</u> – Select this fee structure if you prefer to pay one-time for the term of the permit (until December 31, 2018). Additional annual fees may apply after that time, if the permit is administratively extended. Send check for this amount with this completed NOI.	\$550	<input type="checkbox"/>
Select this if you are State or Local Government.	No Fee	<input checked="" type="checkbox"/>

SECTION V: Certification

To be completed by a responsible corporate officer, proprietor, general partner, principal executive officer, or ranking elected official or their duly authorized representative, as detailed in Part II.C of the permit.

The permit has specific control measure selection and implementation requirements. The permit has quarterly benchmark and visual monitoring requirements. The permit requires you to perform annual Comprehensive Site Compliance Evaluations, and to document the results with your SWPPP. The permit has triggers and requirements for corrective actions. You should be aware of these and other requirements by thoroughly reviewing the permit.

"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 gather and evaluate 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."

Signature/Certifier	Date
	7/16/19

Signatory Name/Title: Typed or Printed	Telephone Number
Mark Morris, Environmental Monitoring Manager	(443) 623-0605

NOI Preparer (Complete if NOI was prepared by someone other than the certifier)

Prepared by:	Mark Morris, Environmental Monitoring Manager
Telephone Number	Email Address
(443) 623-0605	pwmorr12@aacounty.org

Submit completed form along with FEE (payable to Maryland Department of the Environment) to:
Maryland Department of the Environment, P.O. Box 2057, Baltimore, MD 21203-2057

For MDE use only:	Facility #	Receipt #	Date:
PCA 13710	Comp Object 5707	Suffix 406	

MARYLAND DEPARTMENT OF THE ENVIRONMENT
NOI for Permit No. 12-SW, NPDES PERMIT NO. MDR0000
FORM INSTRUCTIONS

WHO MUST FILE

The operator of a facility that is requesting to discharge stormwater from industrial facilities must submit a Notice of Intent (NOI) to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Discharge Permit No. 12-SW. If you have a question about whether you need this permit or any NPDES permit, contact the Maryland Department of the Environment (MDE), Wastewater Permits Program, at 410-537-3323.

Submission of this NOI constitutes notice that the party identified in Section I of this form intends to be authorized by a State/ NPDES permit issued for stormwater discharges from industrial facilities identified in Section II of this form. Authorization to discharge begins upon notification of registration by MDE. The permit is available using this link <http://9nl.at/MD-SWGP> or via MDE's website.

SECTION I: Owner/Operator Information

- (A) Provide the legal name of the person, firm, public organization, or other entity that operates the industrial facility described in Section II of this application. An operator of a facility is a legal entity that controls the operation of the facility.
- (B) Provide the name of the Primary Contact; title of Primary Contact; Primary Contact phone number; Primary Contact e-mail address.
- (C) Provide the primary facility contact mailing address; city; state; zip. All correspondence will be sent to this address.
- (D) Provide the IRS Employer Identification Number (EIN).
- (E) Identify whether the owner/operator is private, federal or state/local government.

SECTION II: Facility Information

- (F) Provide the name of facility – enter "same" if the name does not differ from the information in Section I(A).
- (G) Provide the physical address; city; state; zip – enter "same" if the address does not differ from the information in Section I(C); Provide the County where the facility is located. If this is a contiguous system spanning multiple counties or cities, list all counties and cities. **We now request above ground storage tank information (added 2/21/14).**
- (H) Provide worker's compensation insurance information for the facility identified in this section of the application.
- (I) Provide the primary and any co-located four-digit Standard Industrial Classification (SIC) code describing the facility. Also provide a short written explanation of the industrial process category (e.g., scrap recycling of automobiles). The current Department of Labor's - Occupation, Safety and Health Administration (OSHA) website (<http://www.osha.gov/pls/imis/sicsearch.html>) provides a detailed written description of SIC codes.
- (J) Provide latitude and longitude of the discharge/outfalls requesting to be permitted. To obtain coordinates, you may use a GPS to find location within your site. There are internet options that you can also use, such as Google's Tool. A step by step method can be found at this URL: <http://www.wikihow.com/Find-the-GPS-Coordinates-of-an-Address-Using-Google-Maps>. We require the coordinates be in degrees decimal. An example of this for Maryland Department of the Environment at 1800 Washington Blvd, Baltimore, MD would be latitude of 39.276027, longitude of -76.644779.
- (K) Identify if you are a new discharger, or previously covered under another permit. Identify any previously obtained NPDES permit (general or individual) for your stormwater discharges. If applicable, include the permit number. (e.g., 02SW1234 general permit or 11DP1234)

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NOI for Permit No. 12-SW

individual permit, where 1234 was the unique 4 digit designation for your coverage).

- (L) Provide the total property size at the address, including both the industrial and non-industrial portions of your property (e.g., 2 acres).
- (M) Indicate whether your facility is currently inactive and unstaffed (Part V.A.4 of the permit). Note that if your facility becomes inactive and unstaffed during the permit term, you must notify the Department immediately.
- (N) This section is to verify information about where the stormwater is discharged. Identify the name(s) and 8 digit identifier of the receiving stream or water (e.g., Gwynns Falls 02130905), using the Department's "FindMyWatershed" tool at this link <http://9nl.at/MD-Watershed>. When using the "FindMyWatershed" tool type in your address, and then place your mouse at your discharge points and left-click to bring up the identifier and receiving water.

To verify if the receiving waters are designated as high quality waters, use the Department's "Tier 2" tools at this link <http://9nl.at/MD-Tier2> to locate your facility location and identify if the stream or catchment are categorized as Tier 2. The "Tier 2" tools have shaded areas that indicate where waters are designated as high quality or Tier 2 waters.

To verify if receiving waters are impaired (Category 4a, 4b, 4c, or 5 water bodies), use the Department's "Integrated Report Water Quality Assessment Maps" at this link <http://9nl.at/MD-Impaired> and review each of the impairments provided on that website (bacteria, biological, ions, metals, nutrients, PCBs, pesticides, pH, stream modifications, sediments, toxics or trash) for your facility location. When looking at each of the maps (i.e. Bacteria), you can use the Legend Button on the upper right side of the map to identify what each color or shading means. If the stream or receiving water which receives your stormwater is listed as impaired, indicate this impairment on the NOI. An alternative method is provided through Maryland's Searchable Integrated Report Database available at <http://9nl.at/MD-Impaired>.

If your facility discharges to a municipal storm sewer system (MS4), you are required to contact the jurisdiction. Local storm sewer systems under NPDES permits are listed at: <http://9nl.at/MD-MS4>. If you are uncertain of the MS4 operator, contact your local government department of public works for that information.

SECTION III: Stormwater Pollution Prevention Plan (SWPPP) and Monitoring

- (O) Indicate here the main contact for the SWPPP. Also, indicate how you are providing your SWPPP to the Department, either online with appropriate URL (provide your URL in the space on the form), by email, or other methods provided in the permit. Identify the name, telephone number, and email address of the person who will serve as a contact for the Department on issues related to stormwater management at your facility. This person should be able to answer questions related to stormwater discharges, the SWPPP and other issues related to stormwater permit coverage, or have immediate access to individuals with that knowledge.
- (P) Determine which industrial sectors apply to your operations by first identifying your industrial sectors in Appendix A, and then reviewing Appendix D for applicable benchmark requirements. Verify from this list which ones apply to your facility. If these apply to your facility you will need to apply for access to NetDMR, and begin monitoring (Part V.B of the permit).
- (Q) Confirm if your facility is subject to the Chesapeake Bay Restoration Requirements (see below). You must comply with the Chesapeake Bay Restoration Requirements (Part III.A of the permit) if you meet ALL of these criteria: your facility is within the Chesapeake Bay Watershed; your facility is 5 acres or greater in size; any portion of your facility is located

MARYLAND DEPARTMENT OF THE ENVIRONMENT
NOI for Permit No. 12-SW

within a Phase I or Phase II municipal separate storm sewer system (MS4) jurisdiction; and your facility is not owned by or leased from an entity that is permitted as an MS4.

To determine if your property is in the Chesapeake Bay Watershed, you can use the results from your assessment above or using the Department's "FindMyWatershed" tool at this link <http://9nl.at/MD-Watershed>. Although most of the state is in the Chesapeake Bay Watershed, there are exceptions on the western and eastern sides of the state. The exceptions in western Maryland are those that drain to the Youghiogheny River (eight digit codes 05020201 and 05020202), including Deep Creek Lake (05020203), and areas that drain to the Casselman River (05020204). The exceptions in eastern Maryland are areas that drain to the Christina River (02130607), Isle of Wight Bay (02130103), Assawoman Bay (02130102), Newport Bay (02130105), Chincoteague Bay (02130106), or Sinepuxent Bay (02130104) and areas that drain directly to the Atlantic Ocean (02130101).

Whether you are within the MS4 jurisdiction (e.g. it is located in Frederick County) can be verified by contacting your local government or the Department if you are unsure.

Facilities owned by or leased from an entity that is permitted as an MS4 will perform restoration through the MS4 permit and are therefore not required to do additional work under this permit.

- (R) These three values are part of the calculations required in the permit, for those who are subject to the Chesapeake Bay Restoration Requirements.

Total impervious surface area in square feet is determined in the permit Part III.A.2.a.

Untreated impervious surface area in square feet is determined in the permit Part III.A.2.d.

Impervious surface area subject to 20% restoration requirement in acres is determined in the Part III.A.2.e.

SECTION IV: Permit Fee

Indicate the amount sent with this NOI form. The permit fee for stormwater discharges associated with industrial activity is \$120 per year if submitted with the NOI and then annually on July 1st thereafter. Alternatively, an upfront payment of \$550 (until December 31, 2018) **would be an option with additional annual fees which** may apply after that time, if the permit is administratively extended. The fee shall be submitted with the NOI. Local and State Government are exempt from the fee. The annual rate and application fee may change over time, so you are encouraged to check COMAR 26.08.04.09-1 (C) at the time of your application.

SECTION V: Certification

Signatures and Certifications are detailed in the permit Part II.C. Individuals who discharge to waters of the State without an individual State or general State/NPDES discharge permit, are in violation of the Federal Clean Water Act and of the Environment Article, Annotated Code of Maryland, and may be subject to penalties. An original signature and date is required.

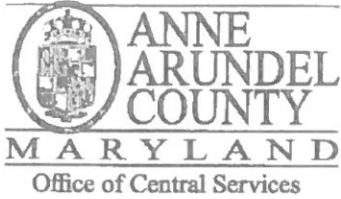
A completed form will not be processed until the fee has been paid-in-full and your SWPPP has been received.

HOW TO SUBMIT:

Send the completed NOI and fee (see permit) to **Maryland Department of the Environment, P.O. Box 2057, Baltimore, MD 21203-2057** and provide the SWPPP in one of the allowed formats (Part II.A.3.b of the permit). You must ensure that the form is completely filled out and payment is enclosed, and the SWPPP follows all permit requirements and is successfully provided to the Department. Your

MARYLAND DEPARTMENT OF THE ENVIRONMENT
NOI for Permit No. 12-SW

permit application will be handled as efficiently as possible. However, if you fail to provide us with the information we request, we will be unable to process your registration for the permit.



Heritage Office Complex
2660 Riva Road, 3rd Floor
Annapolis, MD 21401
Phone (410) 222-7630
Fax (410) 222-7640

Amy Lanham
Safety and Insurance Manager

6/20/2018

Rhody Holthaus, Deputy Director
Waste Management Services
2662 Riva Road
Annapolis, MD 21401

Reference: Workers' Compensation Insurance – Policy ID# I1339

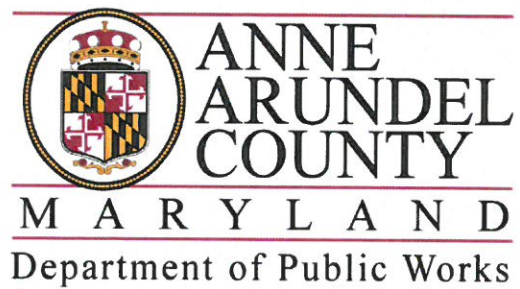
To Whom It May Concern:

Anne Arundel County, Maryland including the Department of Public Works Waste Management Division is self-insured by the Anne Arundel County Self-Insurance Fund for its Workers' Compensation coverage pursuant to Maryland Code Annotated, Labor and Employment § 9-405. There is no expiration date.

If you have any questions, please do not hesitate to contact me.

Very truly yours,


Amy Lanham
Manager, Safety & Insurance



**Stormwater Pollution
Prevention Plan**

**Millersville Landfill and Resource
Recovery Facility**

Central Recycling Center

Anne Arundel County, Maryland

JULY 2019

goods, electronics, other recyclables, used tires, and bulk trash. The Recycling Center also includes multiple closed-top compactors (electric trash/recycling containers).

- The Leachate Pretreatment and Storage Facility, including Leachate Storage Tanks, which are located within a lined containment area southeast of Stormwater Management (SWM) Pond 6. Stormwater collected in the lined containment area for the two 350,000-gallon Leachate Storage Tanks is inspected and sampled prior to discharge to a rip-rap channel leading to Wells Branch.
- The Maintenance/Warehouse/Entrance Area includes the Administration Building, the Cardboard Recycling Facility, the Maintenance and Warehouse buildings, and the Main Entrance Road.
- Closed Landfill Cells and Compost Area: The closed landfills consists of five cells: Cell 1 East, Cell 2, Cell 4, Cells 567, and Cell 8. Cells 1 East, 2 and 4 are located north of the BG&E right-of-way. Cells 567 is located in the center of the site south of the BG&E right-of-way. Cell 8 is located nearest the entrance to the facility, southwest of Cells 567. The Compost Area is located north of Cells 567.
- Active Landfill Cell 9: Cell 9 is located on the southern portion of the facility. The County completed construction of the initial subcell of the Cell 9 disposal area (Subcell 9.1) in December 2016, with initial placement of waste in January 2017. The Cell 9 disposal area will be constructed in phases and is projected to last beyond 2043. A soil stockpile/borrow area and a sedimentation/SWM pond have also been constructed at this location.

These industrial activities are categorized by Standard Industrial Classification (SIC) as outlined below. These SIC codes establish the stormwater monitoring requirements for the facility.

- Sector L (SIC Code LF 4953), Subsector L1 (All Landfills with a refuse disposal permit)
- Sector N (SIC Code 5093), Subsector N2 (Source-Separated Recycling)
- Sector A (SIC Code 2499) (Wood Products, Not Elsewhere Classified)

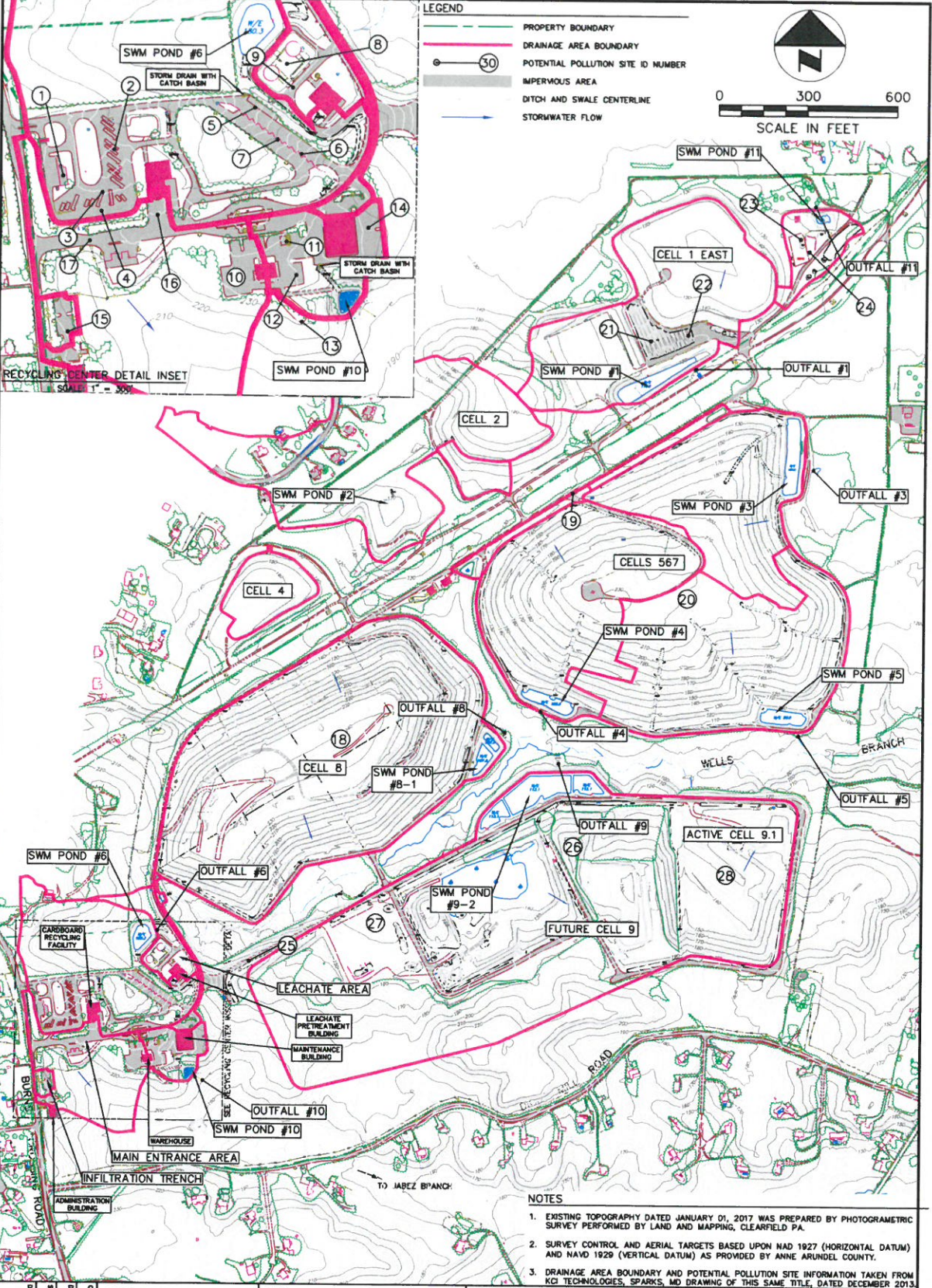
3.2 SITE DRAINAGE

Most of the stormwater runoff at MLFRRF/CRC is conveyed via overland flow to engineered conveyances, including drainage swales, catch basins, and stormwater management facilities. Ultimately, these features discharge into Jabez Branch or Wells Branch, with the divide between the two running along the north side of Cell 9. Drainage boundaries are described on **Table 2** and illustrated on **Figure 2**.

Table 2. Drainage Areas

SWM or Drainage Area ID	SWM Type	Area (acres)	Notes
SWM Pond #1	Retention Pond	31.20	Closed Cell 1 East/Compost Area
SWM Pond #2	Infiltration Pond	42.04	Closed Cell 2 and 4
SWM Pond #3	Retention Pond	24.07	Closed Cells 567
SWM Pond #4	Retention Pond	30.54	Closed Cells 567

Stormwater Pollution Prevention Plan
Millersville Landfill Resource Recovery Facility and Central Recycling Center



2
of 2

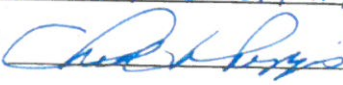
SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT
CONSULTING ENGINEERS, INC.
1180 ROGER BACON DRIVE - RESTON, VA 20190
PH: (703) 474-1818 FAX: (703) 474-6419

CLIENT
**MILLERSVILLE LANDFILL AND
RESOURCE RECOVERY FACILITY
CENTRAL RECYCLING CENTER
SEVERN, MARYLAND**

SHEET TITLE
SITE MAP AND DRAINAGE AREAS
PROJECT TITLE
**STORMWATER POLLUTION
PREVENTION PLAN**

NO.	REVISION	DATE
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		

- NOTES**
- EXISTING TOPOGRAPHY DATED JANUARY 01, 2017 WAS PREPARED BY PHOTOGRAMMETRIC SURVEY PERFORMED BY LAND AND MAPPING, CLEARFIELD PA.
 - SURVEY CONTROL AND AERIAL TARGETS BASED UPON NAD 1927 (HORIZONTAL DATUM) AND NAVD 1929 (VERTICAL DATUM) AS PROVIDED BY ANNE ARUNDEL COUNTY.
 - DRAINAGE AREA BOUNDARY AND POTENTIAL POLLUTION SITE INFORMATION TAKEN FROM KCI TECHNOLOGIES, SPARKS, MD DRAWING OF THIS SAME TITLE, DATED DECEMBER 2013.

Name: Christopher J. Phipps Title: Director, DPW
Signature:  Date: 7/15/19

8.0 MODIFICATIONS TO THE SWPPP

SWPPPs are active documents that are continually updated as facility operations, structures, and inventories change. The SWPPP must be amended whenever:

- There is construction or a change in design, operation, or maintenance at the facility that has a significant effect on the discharge, or the potential for the discharge, of pollutants from the facility;
- Routine inspections or compliance evaluations determine that there are deficiencies in the control measures, including BMPs;
- Inspections by local, state, or federal officials determine that modifications to the SWPPP are necessary; and
- There is a spill, leak or other release from the facility.



Maryland Department of Environment
Water and Science Administration
Compliance Program
1800 Washington Blvd, Baltimore City, MD 21230
410-537-3510

AI ID: 19044 **Inspector:** Wendy Huang

Site Name: Millersville Landfill & Resource Recovery Facility
Facility Address: 389 Burns Crossing Rd, Severn, MD 21144
County: Anne Arundel County

Inspection Date: June 25, 2019 **Start Date/Time:** June 25, 2019, 08:30 AM
End Date /Time: June 25, 2019, 06:15 PM

Media Type(s): NPDES Industrial Stormwater

Contact(s): Mark Morris – Environmental Monitoring Manager
Kari Hanson- MDE Inspector

NPDES Industrial Stormwater

Permit / Approval Numbers: 12SW1304

Site Status: Active

Site Condition: Noncompliance

Recommended Action: Additional Investigation Required

Inspection Reason: Follow-up (Non-Compliance), Initial Quarterly, Initial Yearly

Evidence Collected: Photos/Videos Taken, Visual Observation

Inspection Findings:

An announced inspection was done in Millersville Landfill and Resource Recovery Facility by Wendy Huang (MDE inspector trainee) and Kari Hanson (MDE inspector). MDE inspectors were accompanied by Mark Morris (Environmental Monitoring Manager of Millersville Landfill and Resource Recovery Facility). The facility is currently listed as Sectors L1 and N2 on the 12 SW National Pollution Discharge Elimination System (NPDES) permit. The facility is a landfill for general household trash and a recycling center. The facility is 567 acres. The weather conditions during the time of inspection was sunny at approximately 85°F. Mr. Mark Morris was present during the records review and site walk through.

SWPPP and records review:

The Stormwater Pollution Prevention Plan (SWPPP) was presented during the records review. The most recent SWPPP is dated November 2018. The facility currently has 8 cells (Cells 1 to 8) that are capped and one cell (Cell 9) is active until 2043. Subcell 9.1 is actively receiving general household trash. Soil at subcell 9.2 (west of subcell 9.1) is currently being excavated. At the end of each operating day, the landfill at subcell 9.1 is capped with soil.

The facility has a total of 9 outfalls, with 4 outfalls (Outfalls 3, 4, 5, and 8) that have identical industrial activities. The 4 outfalls from identical industrial activities have stormwater coming from capped landfill cells. Since the previous inspection on 2/22/2018 by April Rhodes, stormwater pollution prevention and control training and annual comprehensive site inspections were conducted yearly and benchmark monitoring, routine site inspection, and stormwater visual monitoring were documented quarterly. The benchmark results (total suspended solids) were uploaded onto netDMR 29 days after the end of the first quarter of 2019. I calculated the average of 4 consecutive quarters (second quarter of 2018 to first quarter of 2019) for total suspended solids (TSS) concentration for outfall 9 and found average TSS concentration to be 103 mg/L. Only stormwater collected in outfall 9 was monitored for benchmark because the rest of the outfalls do not fall under the L1 benchmark requirement.

Inspection Date: June 25, 2019
Site Name: Millersville Landfill & Resource Recovery Facility
Facility Address: 389 Burns Crossing Rd, Severn, MD 21144

TSS concentration benchmark was higher because cell 8 was in the process of being capped in October 2018. Sediment from Cell 8 flows to stormwater pond 8, where sediment laden water was transferred to Cell 9 (subcells 9.3 and 9.4). The sediment laden water was pretreated and pumped to a western side pond of stormwater pond 9 and ultimately discharges to outfall 9. The capping project for Cell 8 was completed in early 2019 so, MDE inspector will calculate 4 consecutive quarters of benchmark average for the first to fourth quarter of 2019.

Compost production facility:

The facility currently has a portion of the land leased for compost production to an outside contractor. The compost production facility collects, grinds, and compost wood waste. The composting production facility and its potential pollutants were mentioned on the SWPPP. Outfalls 1 and 11 were sampled at the stormwater ponds located at the southwestern part of composting facility and northeastern part of the landfill facility, respectively. Stormwater from inactive cell 1 and composting activity flows to outfall 1. The water from outfall 1 is clear but have algae growing at a pooling area. However, water did not leave the property. Outfall 11's stormwater is clear during the time of inspection and is usually sampled west side of a weir during visual monitoring.

Recycling center:

The recycling center has an oil shed, dumpsters, pretreatment leachate facility, and paint tote area. The oil shed have chemical tanks under secondary containment and a three side metal building. The oil shed ground surface is cleaned six times a year with a power wash. Waste water from the power wash is vacuumed into a truck and disposed offsite. The oil shed collects antifreeze, waste oil, batteries and latex paint. The Anne Arundel County residents drop off household waste, propane tanks, cardboards, paper, plastic, metal, glass, and electronics at the recycling area.

Maintenance/ warehouse area:

These areas include the administrative building, fueling station, truck maintenance, and cardboard recycling facility. The truck maintenance facility maintain heavy equipment and vehicles. Vehicles and heavy equipment are not washed on site. The fuel island has spill kits and have minor amount of old oil stains on the surface. Stormwater from the vehicle maintenance area flows stormwater pond 10, and ultimately to outfall 10, where water discharge is clear.

Leachate facility:

Two leachate tanks are in secondary containment. Once leachate fill up the tanks, they are automatically pumped to the sewer systems that ultimately flows to Patuxent Wastewater Treatment Plant. A pretreatment leachate facility is currently non- active. Stormwater pond 6 is located north of the leachate tanks and south east of the non-active pretreatment plant. Stormwater from the maintenance area flows to a sediment trap, stormwater pond 6, and ultimately to outfall 6, where water discharge is clear. Sediments will be vacuumed from the sediment trap through a manhole as necessary.

Non active landfill cells:

Cells 1 to 8 are currently non- active. The cells are currently capped and no longer disposing solid waste there. Stormwater from these inactive cells (Cells 3, 4, 5, and 8) drains to a stormwater pond and outfalls that correspond to the landfill numbering cell systems. Stormwater from the aforementioned outfalls flows to Wells Branch. Roll offs were observed along the east side of the cells 5, 6, and 7. There were minimal discharge from outfalls 5, 6, and 7 and no discharge from outfall 8. Totes of deionized (DI) water were observed at the east entrance of the gas- to- electric facility plant and northwest of cells 3, 4, and 5. The liquid in the DI water totes looked blue but Mr. Mark Morris was informed by one of the landfill operators at the end of the inspection that it is normal for the DI water in totes to look blue from faraway and clear close up. MDE inspectors did not look at the DI water totes close up.

Stormwater from cell 2 drains to a sand filter/ stormwater pond 2 and outfall sampling did not occur because the riser that water flows into is too far (25 feet away) from the high water line and does not exit the facility.

Inspection Date: June 25, 2019
 Site Name: Millersville Landfill & Resource Recovery Facility
 Facility Address: 389 Bums Crossing Rd, Severn, MD 21144

Active land fill:

Cell 9 is currently active. Subcell 9.1 is currently accepting household trash and subcell 9.2 (west of subcell 9.1) is being excavated. A borrowing pit was observed west of outfall 9. The borrowing pit contains sediment laden water from stormwater pond 8 during a capping project. The water from the borrowing pit is pumped to the western side pond of stormwater pond 9. The stormwater pond 9 has 3 ponds where water from the eastern and western side ponds flows through a stone weir with filters and into the central pond. Outfall 9 stormwater discharge was clear.

With respect to the above MDE authorization the following violations of Environmental Articles 9, Millersville Landfill and Resource Recovery Facility were observed this date with corrections needed immediately:

- 1) First quarter 2019 benchmark result were submitted on 4/29/2019. **Benchmark parameters should be submitted within 28 days after the end of each quarter.**
- 2) A leased composting facility is on site but is not listed on the SWPPP as Sector A, SIC code 2499. **A Notice of Intent (NOI) should be submitted to MDE and the SWPPP should be updated to state that the facility is also a Sector A industry.**
- 3) Oil stains and absorbance pallets were observed at the west entrance to the oil shed. The contaminants are in the position to enter into a storm drain located at the south side of the oil shed. **Implement good housekeeping by removing the oil stains and absorbance pallets from the oil shed entrance.**
- 4) Residual paint on multiple paint totes were observed south east of the oil shed. **Paint totes should be under covered or removed from the site.**
- 5) Sediment trap were observed at the south side of stormwater pond 6 but was not included on the site map. **Edit the site map to reflect the aforementioned information.**

State law provides for penalties for violations of Maryland Environment Article Title 9 for each day the violation continues. The Maryland Department of the Environment may seek penalties for the aforementioned violations of Title 9 on this site for each day the violation continues.

A follow up inspection will be conducted to verify compliance in approximately 60 days. Any questions regarding this report can be referred to Wendy Huang at 410-387-1181 or at wendy.huang@maryland.gov. A copy of this report has been referred to Mark Morris.

NPDES Industrial Stormwater- Inspection Checklist

Inspection Item	Status	Comments
1. Does the facility have a discharge permit? [Environment Article §9-323(a)(1-3)]	No Violations Observed	
2. Has a Stormwater Pollution Prevention Plan (SWPPP) been implemented as required? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]	No Violations Observed	
3. Is the number and location of discharge outfalls as described within the Stormwater Pollution Prevention Plan (SWPPP)? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]	No Violations Observed	
4. Are identified outfalls representative of stormwater discharges from the site? [40 CFR Part 122 Subpart B Section 122.26.(c)(1)(i)(A-B)]	No Violations Observed	

Inspection Date: June 25, 2019
 Site Name: Millersville Landfill & Resource Recovery Facility
 Facility Address: 389 Burns Crossing Rd, Severn, MD 21144

NPDES Industrial Stormwater- Inspection Checklist

<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
a5. Does the Stormwater Pollution Prevention Plan (SWPPP) require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart C Section 122.42.(b)(1-3)]	No Violations Observed	
6. Are adequate records being maintained for the quarterly routine facility inspections? [Environment Article §9-261(a)(2)]	No Violations Observed	
7. Are adequate records being maintained for the quarterly visual monitoring? [Environment Article §9-261(a)(2)]	No Violations Observed	
8. Are adequate records being maintained for the annual comprehensive evaluation? [Environment Article §9-261(a)(2)]	No Violations Observed	
9. Are adequate records being maintained for the employee training who are implementing activities necessary to meet the conditions of the permit? [Environment Article §9-261(a)(2)]	No Violations Observed	
10. If monitoring of benchmark parameters is required, has the permittee performed the required quarterly monitoring? [COMAR 26.08.04.03A(2)]	No Violations Observed	
11. If monitoring of benchmark parameters is required, has the permittee submitted quarterly benchmark monitoring results electronically within the allotted time? [COMAR 26.08.04.03C(2), 40 CFR Part 127.16]	Out of Compliance	Benchmarks were submitted 1 day late for first quarter of 2019
12. Were visible pollutants observed in the receiving waters or in a position likely to pollute water of the State? [Environment Article §9-322]	Out of Compliance	See FIR
13. If discharges were observed, were samples of the discharge taken? [Environment Article §9-261(c)(1)]	No Violations Observed	

Inspector: Wendy Huang
 Wendy Huang/Date
 wendy.huang@maryland.gov
 410-537-3526

Received by: Mark Morris 6/26/19
 Signature/Date
MARK MORRIS
 Print Name

Report Provided to:
 Fax
 Email
 Regular Mail
 Certified Mail

Inspection Date: June 25, 2019
Site Name: Millersville Landfill & Resource Recovery Facility
Facility Address: 389 Burns Crossing Rd, Severn, MD 21144



**DPW
& YOU**
Making a difference, together

Bureau of Waste Management Services
389 Burns Crossing Road
Severn, Maryland 21144
Phone (410) 222-6108

July 16, 2019

Ms. Wendy Huang, Inspector
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. Huang:

It was a pleasure to accompany you and Kari Hanson during your stormwater inspection of the Millersville Landfill and Resource Recovery Facility (MLFRRF) on June 25, 2019. As you might expect, the Bureau of Waste Management Services (the Bureau) takes great pride in our state-of-the-art facility and we are committed to offering very necessary services to customers while at the same time protecting our neighbors, employees, and the environment. To that end, I want to personally assure you, Kari and the Maryland Department of the Environment (MDE) that we will make every effort to ensure full compliance with our stormwater permit and will continue to operate the MLFRRF to the highest environmental standards. We have provided a response to each of the issues identified in your inspection report (AI ID: 19044), and offer the steps that we are taking to remedy them in the remainder of this letter. For convenience, a copy of your inspection report is enclosed.

Reporting First Quarter 2019 Benchmark Results

As the Bureau's Environmental Monitoring Manager, it is my responsibility to ensure that benchmark results are entered into the netDMR system on or before the 28th day of the month following the end of each reporting quarter. Unfortunately, April 28, 2019, fell on a Sunday and I was unable to enter the laboratory data before that date so the results were entered on Monday, April 29th. I realize that this was one day after the due date. In the future, I will make every effort to enter the benchmark results on or before the deadline to ensure that this does not happen again.

Ms. Wendy Huang
MLFRRF Stormwater Inspection
July 16, 2019
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Industrial Classification for On-site Composting Operation

Anne Arundel County expanded its yard waste composting pad in 2017, and outsourced the operation of the area to the Northeast Maryland Waste Disposal Authority, an independent state agency. The Authority hired Harvest Mid-Atlantic to conduct operations. Harvest holds the permits for operation of the Tier 1 facility as required by MDE. All the yard waste material deliveries are controlled by Anne Arundel County.

MDE has determined that the composting operation at MLFRRF should be classified as a Sector A (Timber Products), Standard Industrial Classification (SIC) Code 2499 (Wood Products, Not Elsewhere Classified), and that the Bureau should submit an updated Notice of Intent (NOI) adding this industry sector and revising the MLFRRF Stormwater Pollution Prevention Plan (SWPPP) to reflect this change. Enclosed is the page to the updated NOI (see update to Section II, page 2 adding SIC Code 2499) and to the revised SWPPP (see revision to last bullet of Section 3.1, page 3 adding Sector A, SIC Code 2499). A copy of this letter, the updated NOI and the revised pages to the SWPPP have been sent to Ms. Marjorie Newbourn, MDE Project Manager, Industrial and General Permits Division for processing.

Housekeeping to Remove Oil Stains and Absorbent Pellets

Oil spills and visible oil stains may occur in areas heavily trafficked by residential customers. The Bureau's housekeeping policy when addressing oil spills is to immediately contain the spilled material to prevent it from entering the environment through storm drains. Once the spill is contained, Oil-Dri or similar oil absorbent products in solid form and pad, sock or pillow forms are applied to the spill area to absorb and remove the spilled material. These absorbent products are generously applied, worked into the spilled material and allowed to remain on top of the spill area to maximize absorption. Once the spilled material is absorbed, the used products are removed from the spill area, bagged and properly disposed. If the first application of oil absorbent products do not remove all visibly mobile spilled material, the process is repeated until all visibly mobile material is removed. Any absorbent product that remains in the spill area to maximize absorption is removed by the end of the work day. Street sweeping vehicles are periodically driven over these areas to reduce the appearance of stains and to further remove any remaining contaminated sediment. The Bureau will continue to remain vigilant in administering its housekeeping policy.

Ms. Wendy Huang
MLFRRF Stormwater Inspection
July 16, 2019
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Empty Paint Totes

The Bureau repurposes empty road marking paint totes at our facilities. These high-density polyethylene totes originally contained water-based paint used to stripe public roads. Any paint remaining in or on these totes when they are delivered to us is completely dry and aggressively adhered. As such, these containers do not represent a potential pollutant source. The Bureau respectfully requests that MDE reconsider its request to have the totes stored under roof or removed from the site, and that the Bureau be allowed to store the totes in their current location until such time that they are recycled or used in our operations.

Storm Drain Sediment Basin to Pond 6 and Pond 10

In the fall of 2018, the Bureau upgraded the storm drains to Ponds 6 and 10. As part of the upgrade, the storm drains were retrofitted with oversized catch basins to remove excess grit, sand and other sediment from stormwater runoff before the stormwater enters the ponds. The Bureau has shown these storm drains on the site map in the revised MLFRRF SWPPP (see enclosed map). A copy of the revised site map was included with the package sent to Marjorie Newbourn.

Again, I would like to thank you for your help in this process and the collaborative manner in which you and your program have been working with us to address issues. Should you have any questions or require additional information, please contact me on (443) 623-0605.

Sincerely,



Mark Morris
Environmental Monitoring Manager
Bureau of Waste Management Services

Enclosures

cc: Tammy Roberson
Kari Hanson