

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.

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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.

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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

Marke Morres

Environmental Monitoring Manager Bureau of Waste Management Services

Enclosures

cc: Tammy Roberson

Kari Hanson



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: Facility Address: Millersville Landfill & Resource Recovery Facility

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: Facility Address: Millersville Landfill & Resource Recovery Facility 389 Burns 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.**
- 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.
- 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?	No Violations	
[Environment Article §9-323(a)(1-3)]	Observed	
2. Has a Stormwater Pollution Prevention	No Violations	
Plan (SWPPP) been implemented as required?	Observed	
[40 CFR Part 122 Subpart B Section		
122.26.(c)(1)(i)(A-B)]		
3. Is the number and location of discharge	No Violations	
outfalls as described within the Stormwater	Observed	
Pollution Prevention Plan (SWPPP)? [40 CFR		
Part 122 Subpart B Section 122.26.(c)(1)(i)(A-		
B)]		
4. Are identified outfalls representative of	No Violations	
stormwater discharges from the site? [40 CFR	Observed	
Part 122 Subpart B Section 122.26.(c)(1)(i)(A-		
B)]		

Inspection Date: Site Name: June 25, 2019

Facility Address:

Millersville Landfill & Resource Recovery Facility 389 Burns Crossing Rd, Severn, MD 21144

Inspection Item Status Comments a5. Does the Stormwater Pollution Prevention No Violations Plan (SWPPP) require modifications to Observed prevent runoff of pollutants? [40 CFR Part 122 Subpart C Section 122.42.(b)(1-3)] 6. Are adequate records being maintained for No Violations the quarterly routine facility inspections? Observed [Environment Article §9-261(a)(2)] 7. Are adequate records being maintained for No Violations the quarterly visual monitoring? [Environment Observed Article §9-261(a)(2)] No Violations 8. Are adequate records being maintained for the annual comprehensive evaluation? Observed [Environment Article §9-261(a)(2)] 9. Are adequate records being maintained for No Violations the employee training who are implementing Observed activities necessary to meet the conditions of the permit? [Environment Article §9-261(a)(2)] 10. If monitoring of benchmark parameters is No Violations required, has the permittee performed the Observed required quarterly monitoring? [COMAR 26.08.04.03A(2)] 11. If monitoring of benchmark parameters is Out of Benchmarks were submitted 1 day late for first quarter of required, has the permittee submitted quarterly Compliance 2019 benchmark monitoring results electronically within the allotted time? [COMAR 26.08.04.03C(2), 40 CFR Part 127.16] 12. Were visible pollutants observed in the Out of See FIR receiving waters or in a position likely to Compliance pollute water of the State? [Environment Article §9-3221

NPDES Industrial Stormwater-Inspection Checklist

	narges were observed, were the discharge taken? [Environment	No Violations Observed		
Inspector:	Wendy Huang/Date wendy.huang@maryland.gov 410-537-3526	1	Received by: Mark Mores	126/19
Report Provid Fax Email Regular M	Iail			

Inspection Date: Site Name: Facility Address:

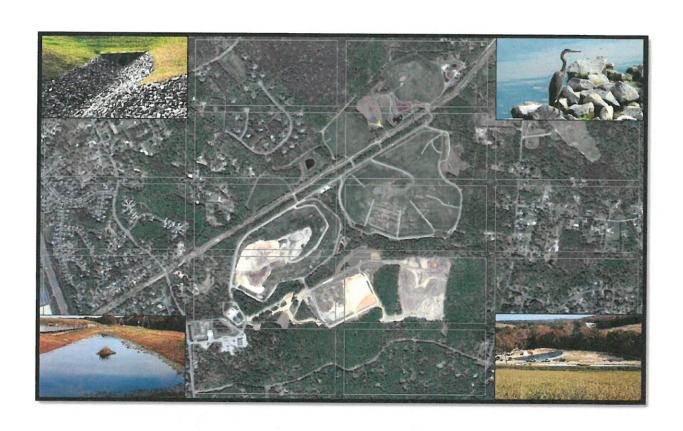
June 25, 2019 Millersville Landfill & Resource Recovery Facility 389 Burns Crossing Rd, Severn, MD 21144

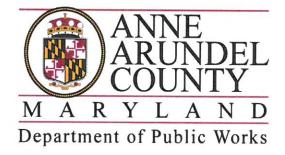
MARYLAND DEPARTMENT OF THE ENVIRONMENT

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: Co-located SICs: Description of your primary industrial activity:						
Municipal Solid Waste Landfill & Source-Separated Recycling Facility						
(J) Latitude Longitude (K) Check here if you a new discharger.						
76.6675 39.0944 If not a new discharger, provide the previous registration (e.g., 02SW1234) 12SW-1304						
(L) Total property size 565 (in acres) (M) 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) Bacteria Biological Ions Metals Visualizations Visualizati						
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						

Form Number: MDE/WMA/PER.004 Revision Date: March 14, 2014





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-ofway. 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.

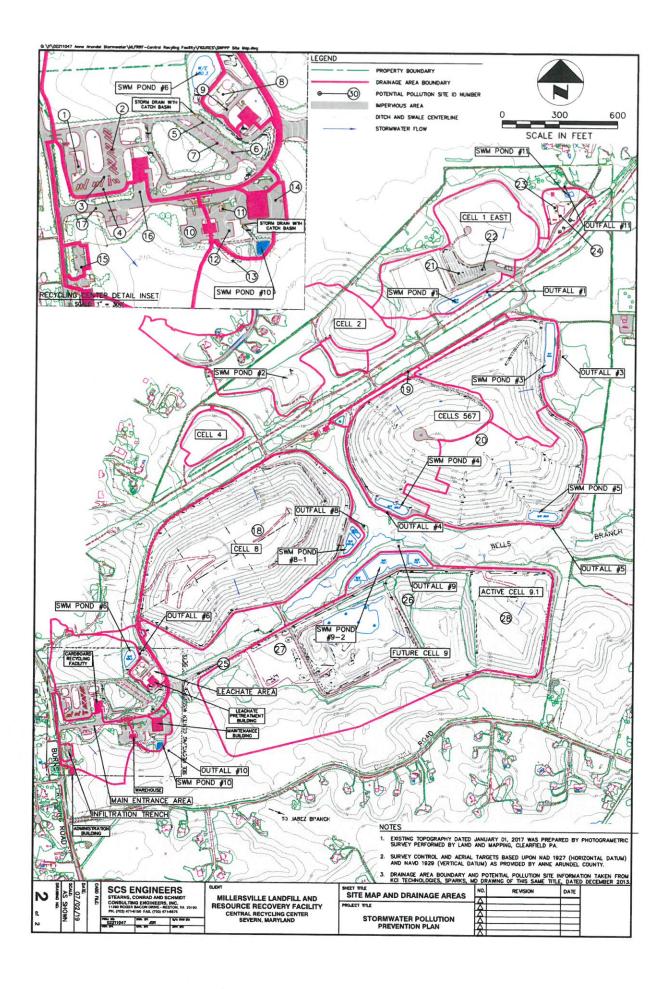
- Sector L (SIC Code LF 4953), Subsector L1 (All Landfills with a refuse disposal permit)
- Sector N (SIC Code 5093), Subsector N2 (Source-Separated Recycling)
- Sector A (SIC Code 2499) (Wood Products, Not Elsewhere Classified)

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.	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



Name: Christophe-J. Phipps	Title: Director DPW
Signature: And Phys	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.