Construction/Demolition Waste in the Cowboy State

ASTSWMO Joint HW & MM Training
August 15, 2017
Oklahoma City, OK
CD Landfill Permitting

- Permit Required – Separate regulation for CD landfills
- 6 Year Permit Term – Proposing permits for the entire operating life
- Closure Permits for entire post-closure period
CD Landfill Liners

- Not required if >20 feet of >80% sand, silt, and/or clay to groundwater
  - None lined now
  - Proposing change where liners may be required
- Must not alter groundwater quality
- Waste must not contact groundwater
- No discharge to surface waters
Waste Types Allowed

- Restricted by rule and guidance
- Rule: stone, clean and treated wood, concrete, asphaltic concrete, cinder blocks, brick, plaster and metal or other material specifically approved by the Administrator
- Guidance: white goods, non-friable asbestos, carpet, RR ties (weathered household quantities), mobile homes, empty containers, etc.
Waste Types Prohibited

- Restricted by rule and guidance
- Rule: garbage, liquids, sludges, friable asbestos, and hazardous or toxic wastes
- Guidance: batteries, e-waste and CRTs, liquids and containers with liquids, mercury containing lamps, medical waste, treated wood, used oil filters, etc.
Groundwater Monitoring

- **Now:**
  - Optional
  - Constituents determined by DEQ
  - DEQ runs statistics

- **Proposing**
  - Required
  - Indicator parameters + EPA Appendix I
  - Operator must run statistics and report to DEQ
Cover

- **Routine:**
  - 6 inches of soil monthly or more frequently if required by the Administrator
  - If < 20 yards of waste/month, cover when waste reaches depth of 3 feet
  - Alternate cover may be approved

- **Intermediate:**
  - 12 inches over areas that won’t receive waste for 180 days
Final Cover

- 6 inches of vegetated topsoil over,
- 2 feet of compacted soil (no compaction standard) over,
- Any routine or intermediate cover already in place
Financial Assurance

- Municipally operated:
  - Not required for closure or post-closure
  - Required for corrective action
- Required for all others
Post-Closure

- 5 year minimum
- Automatically extends until the Administrator determines closure is protective of HH&E
Corrective Action

- Currently no standards in CDLF rule
- Proposed: Compliance complete when concentrations < standards for 3 consecutive years
- Administrator may approve an alternate length of time
Related Issue

- Animal mortality
  - Closing small unlined MSWLFs
  - Some local governments are keeping unlined CDLFs
  - Is disposal in an unlined CDLF ok?
  - Yes, if composted to “bones and hide”
  - Chronic Wasting Disease (CWD) complication for big game animals
    - All big game (whole, parts, compost) must be disposed in a landfill