SCS ENGINEERS

January 31, 2023 File No. 02218208.17

Mr. Daniel P. Scott, P.E., Permit Writer Virginia Department of Environmental Quality – SWRO Division of Land Protection & Revitalization 355-A Deadmore Street Abingdon, VA 24210

Subject: City of Bristol Landfill SWP498 Notice of Intent – Major Permit Modification Closure/Post Closure Care Plans

Dear Mr. Scott:

SCS Engineers (SCS) is hereby filing this Notice of Intent (NOI) on behalf of the City of Bristol (City) regarding the City's intent to submit a major permit modification to address changes in the Closure Plan for the facility listed above. The major permit modification is being submitted in accordance with 9VAC20-81-600. Table 5.2 of this section identifies changes to the design of the final closure cover (Item 4) and landfill mining (Item 5) as major permit modifications. In general, the Closure and Post Closure Care Plans are being updated in accordance with VDEQ Submission Instruction No. 6 – Closure and Post Closure Care Plans. Mining activities have permanently ceased, and the mining operating plan is being eliminated.

1.0 DESCRIPTION OF PROJECT

The existing Permit 498 municipal sanitary landfill is located within the incorporated limits of the City of Bristol, approximately two miles east of downtown Bristol, Virginia at 2655 Valley Drive. The City of Bristol Integrated Solid Waste Management Facility (ISWMF), which includes Permits 221, 498, and 588, is owned and operated by the City of Bristol, Virginia. Figure 1 is an area map showing the location of Permit 498. The latitude and longitude of the facility are as follows:

Latitude: 36° 30' 12"

Longitude: 82° 09' 36"

Figure 2 is a site location map showing the City of Bristol Integrated Solid Waste Management Facility, its boundary, and surrounding geographic features. The ISWMF encompasses approximately 183 acres. The limits of waste occupied by Permit 498 encompasses approximately 18.9 acres. On August 29, 2004, VDEQ approved the mining of materials from Permit 498. Prior to September 12, 2022 the Permit 588 landfill stopped accepting waste and mining of the Permit 498 facility was no longer necessary. Final closure of the Permit 498 facility is now required per the Consent Decree between VDEQ and the City.

The facility will be closed in accordance with the amended Closure Plan. To meet grades, the City will regrade the existing waste.



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The limits of Permit 498 based on the plat provided by the City are 18.9 acres. Under current conditions this would be considered the "facility boundary." Actual waste limits and hence the closure cap are estimated at 12.4 acres. Design of the facility required that a significant clay berm be placed around the toe of the disposal area and periodically with subsequent phases. In discussions with VDEQ, it was determined that the outer slope of this berm would not require formal capping as it is stabilized at this time.

2.0 DISCUSSION PER 9VAC20-81-600.F.3 – MAJOR MODIFICATION

The following information for the major modification is being provided in accordance with 9VAC20-81-600.F.3

2.1 DESCRIPTION OF EXACT CHANGE TO BE MADE

The existing closure plan for Permit 498, is dated December 1990 and has not been updated since its original submittal and approval by VDEQ. As discussed with VDEQ, the City will update the Closure Plan to address the following:

- The cessation of mining and the elimination of the mining plan;
- Final grades revisions;
- Cap section design and configuration;
- Modification to the stormwater management system to address new grades;
- Update to post closure care plan; and
- Other general modifications to meet the requirements of Submission Instruction 6.

2.2 IDENTIFICATION THAT ALTERATION IS A MAJOR MODIFICATION

As indicated above, Table 5.2 – Permit Modifications included under 9VAC20-81-600 identifies changes to the design of final closure cover and landfill mining as major modifications.

2.3 EXPLANATION OF NEED FOR MODIFICATION

With the cessation of mining, the final closure design must be revised to conform to topography that can be achieved utilizing the existing waste volumes.

2.4 PROVISION OF APPLICABLE INFORMATION

As required by the regulations regarding a notice of intent, Figures 1 (Area Map) and Figure 2 (Site Location Map) are provided as attachments to this letter. As this is an existing landfill and as the modification does not represent a vertical or lateral expansion to the facility, or the transfer of the permit to another entity, no other documentation is required for the notice of intent.

The following documentation will be submitted for the permit modification:

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- Form SW PTB Solid Waste Disposal Facility Part B Application (to be submitted under separate cover)
- Attachment III Final Closure Drawings
- Attachment IV Closure Plan
- Attachment V Post-Closure Care Plan (to be submitted under separate cover)
- Attachment VII Construction Quality Assurance Plan and Technical Specifications (to be submitted under separate cover)
- Attachment XII Financial Assurance Documentation (to be submitted under separate cover)

Please contact us if you have questions or need additional information.

Sincerely,

Varen

Charles J. Warren, PE Project Manager SCS Engineers

Selan William

Thomas R. Williams Project Engineer SCS Engineers

CJW/TRW

cc: Randall Eads, City of Bristol Mike Martin, City of Bristol Joey Lamie, City of Bristol Jake Chandler, City of Bristol Jeff Hurst, VDEQ Susan Blalock, VDEQ Stacy Bowers, VDEQ Jonathan Chapman, VDEQ

Encl.

Figure 1 – Area Map Figure 2 – Site Location Map



