



NEW MEXICO
ENVIRONMENT DEPARTMENT



Solid Waste Bureau

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GUIDANCE DOCUMENT

Re: Guidance For Approval of Alternate Daily Cover At Landfills

The Solid Waste Bureau (Bureau) has reviewed the information submitted on _____, describing the different types of alternate daily cover (ADC) that _____ is proposing to use at the _____ Landfill. Before addressing the use of these materials, the following general guidelines shall be implemented and written into each of the landfills' operating plans:

1. The long-term stockpiling of ADC materials should be avoided in order to prevent the appearance of materials not being properly disposed or causing a potential health and safety problem. The maximum acceptable storage time depends upon the type of ADC materials to be stored;
2. Areas designated for the short term stockpiling of ADC shall be clearly identified in the landfills' operating plans. This will allow obvious discernment between ADC materials, recyclable storage area(s) and solid wastes;
3. ADC materials that will be mixed prior to application shall be mixed in a manner that minimizes dust generation and windblown litter. The landfills' operating plans shall be revised to specify the proportions of each ADC component when utilizing mixed ADC materials; and
4. ADC materials that are special wastes or otherwise require analytical testing shall be sampled, analyzed and fully documented in each of the landfills' operating records prior to use as ADC. The landfills' operating plans shall identify which ADC materials require analysis and indicate the required parameters and test methods.

The Bureau has placed the requested ADC materials into three categories:

Category I. The Bureau is willing to approve these materials with no specific conditions other than what has been indicated above regarding documentation of the site-specific storage and use practices. Prior to the use of any ADC, the landfill's revised operations plans (or applicable portions thereof) shall be sent to the Bureau for review and approval. This requirement is not applicable for the use of ADC materials that are already being utilized and have already been approved by the Bureau in writing.

Category II. The Bureau is willing to consider approval of these ADC materials after a pilot beneficial use plan has been submitted and the field pilot evaluation has been completed. A plan for each proposed ADC material shall be submitted and the plan shall include a pilot period of one (1) to three (3) months during which the ADC will be evaluated for effectiveness. Weekly

reports shall be submitted to the Bureau. The weekly reports should include assessments of the effectiveness of the ADC's durability, infiltration prevention, vector control, litter control, odor control, fire control, ability for use during inclement weather, cost-effectiveness and any other demonstration information, to include photographs. Any operational difficulties or advantages should also be noted. After the pilot period, the reports will be reviewed and a final decision will be made by the Bureau.

Category III. The Bureau is denying the use of these proposed ADC materials based on potential risk to the public, the facility's employees, or the environment; public perception of the stockpiles or the use of such material as ADC; or other concerns with the type of material(s) proposed, such as, but not limited to, odors or fugitive emissions.

The following materials have been placed into *Category I*:

1. Tarps
2. Treated Petroleum Contaminated Soils [May be used only after testing in accordance with the landfills' permit requirements and the SWMR confirm that the soil has been properly remediated.]
3. Foam [If foam other than what has already been approved is considered, this ADC material becomes a Category II ADC.]
4. Chipped tires [Must be between two (2) and twelve (12) inches in size.]
5. Tire shreds ["Alligators" acceptable, but must not exceed twelve (12) inches in length.]
6. Shredded green waste [Chipped brush and vegetation must be processed to 80% less than or equal to eight (8) inches, with no large items such as tree stumps.]
7. Clean fill [Broken concrete, reclaimed asphalt, brick, glass, etc., but must not contain any solid waste, such as land clearing debris and construction and demolition debris, and shall be processed to 80% less than or equal to eight (8) inches.]
8. Compost or mulch [Fully composted material acceptable, except that offal/mortality compost shall not be utilized.]
9. Woody trimming waste [Clean material that has been processed to less than or equal to eight (8) inches is acceptable. This ADC material must be woody waste other than land clearing debris (yard waste). (Only untreated, unpainted, source-separated wood trimmings with no attached shingles, mastics, laminates or other similarly affixed materials are allowable.)

The following materials have been placed into *Category II*:

1. Foams [Other than foams that have already been approved by the Bureau.]
2. Metal [The source and composition of the metals must be submitted to the Bureau for review and approval. Additionally, the method and location of processing the material, if required, must be demonstrated.]
3. Paper pulp slurries [All such proposed ADCs shall pass the USEPA Paint Filter Liquids Test and a demonstration regarding how the ADC will be utilized, stored and mixed with approved ADC or soil shall be submitted to the Bureau for review and approval. Please note that this type of proposed ADC is typically a special waste.]
4. Auto Fluff/Automotive Shredder Residue (ASR) [This proposed ADC is a special waste. In accordance with the Bureau's current policy regarding the management of ASR, the ASR must be tested for PCBs using USEPA Test Method 8082 and may require TCLP metals analysis. A disposal management plan must be approved by the Bureau. If the proposed ADC contains equal to or greater than 50 PPM of PCBs, it may not be utilized as ADC. In addition, this proposed ADC shall be covered with at least three (3) inches of soil, as it has potential to be wind blown. During the pilot period, the proposed ADC may be applied in 4-

6 inch lifts and shall be covered with three (3) inches of soil. Finally, this proposed ADC shall not be stored at the landfills unless it is containerized, covered and used in a timely manner.]

5. Water Treatment Sludge [As opposed to waste water treatment plant (POTW) sludge, this waste may be considered for use as ADC if the material is addressed under a disposal management plan, passes the USEPA Paint Filter Liquids Test, pH is verified, and it is tested by TCLP for all necessary constituents. The specific test parameters and testing frequency shall depend upon the processes through which the material was generated. If utilized, this material shall be mixed with cover soil (as a soil extender) prior to application as ADC. It shall not be mixed with any other ADC materials.]

6. New Technologies [The Bureau requires any new technology to be presented to the Bureau for consideration. Unless the proposed ADC is determined to fall into Category I or Category III, as per this correspondence, a pilot plan shall be accomplished to demonstrate its effectiveness.]

The following materials have been placed into *Category III*:

1. Construction and demolition debris (C&D) [Because of the difficulty in distinguishing between solid waste requiring disposal and the proposed ADC, the potential for C&D to contain unauthorized wastes (such as asbestos), the potential for public concerns about the handling and storage of the C&D, and due to issues concerning its application as a cover material, this material is not approved for use as ADC.]

2. Waste water treatment plant sludge [Because of pathogens, odors and potential for runoff, this material is not approved for use as ADC.]

3. Street sweepings [As a waste with a lack of consistency in its generation that may be contaminated by fluids or other contaminants washed from the roadways, this material is not approved for use as ADC.]

4. Sand trap residues [As a waste with a lack of consistency in its generation that may be contaminated by fluids or other contaminants, this material is not approved for use as ADC.]

5. Asphalt roofing materials [Because of the potential for such materials to contain asbestos and the resulting necessity to determine the condition and asbestos content (if any) of the material, and because of the certainty that heavy equipment will overrun and impact the material, this material is not approved for use as ADC.]

6. Gypsum board [As a waste that is a type of C&D, and because of the relative certainty that its use as ADC would generate fugitive emissions consisting of dusts, and because of pH and Sulfide concerns, this material is not approved for use as ADC.]

7. Plastics such as Visqueen [As a waste with a lack of consistency in its generation and characteristics, and due to issues related to its application and anchoring, and since the material will typically be thinner than standard cover tarps with questionable or varying durability and brittleness, this material(s) is not approved for use as ADC.]

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