

New York State Department of Environmental Conservation

Division of Materials Management, Region 8

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Joe Martens
Commissioner

June 23, 2014

Mr Larry Shilling,
Regional Vice President
Casella Waste Systems Inc.
6653 Herdman Road
Angelica, NY 14709

Dear Mr. Shilling:

RE: Chemung County Landfill, Radiation Monitors and Leachate Testing
Chemung (T) Chemung (C)

6 NYCRR Part 360-2.9 requires that the operation and maintenance manual for a landfill contain comprehensive descriptions of the day-to-day facility operations throughout the active life of the landfill. To meet this requirement Section 4.4.1 of the Chemung County Landfill's O&M describes the operation and maintenance of the site's waste screening radiation detectors.

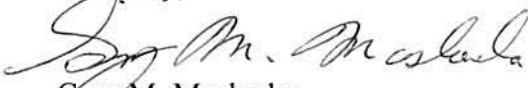
Paragraph two of Section 4.4.1 describes a work plan for a study to correlate radiation detector reading, measured in kilocounts per second (kcps), to radiation levels in incoming loads of waste which is measured in pCi/g. The work plan is intended to gather data to confirm and refine the correlation used when the radiation detector was first installed at the landfill. This work plan calls for the sampling and analysis of six (6) loads of natural gas well drill cuttings; three (3) drill cutting loads that trigger the detector's investigation alarm, and three drill cutting (3) loads that do not trigger the investigation alarm. To date no load of drill cuttings, or other technically suitable type of waste, has triggered the radiation detector's alarms; therefore the work plan has not been conducted. The Department believes a correlation refinement study should be done. Therefore, by August 15, 2014 the Department is requiring you to submit a proposal for an alternative work plan for a study that will confirm and refine the correlation between the radiation detector reading at the landfill and radiation levels in loads of incoming waste. The work plan should follow the format and meet the technical requirements we discussed in our meeting earlier this month (June 5, 2014). After completion of the work plan and subsequent completion of the correlation/refinement study the O&M manual must be modified to reflect the results.

Also, the landfill's environmental monitoring plan (EMP) calls for radiological testing of the landfill leachate to be reduced after three (3) years of sampling and analysis. This three (3) year period will end after the June 2014 sampling round is completed. The reduction includes going from collecting and analyzing samples twice per year, in January and June, to once per year (June). It would also eliminate sampling of leachate from various points in the leachate collection system and instead only sample and analyze leachate from the leachate collection system's storage lagoon

The radiological test results for the leachate to date show that levels are very low. The radiological test results also show that levels have fluctuated over time and that the relatively small data set shows no clear trend. The Department believes that reducing the testing frequency and locations at this time could lead to misinterpretation of the radiological results. As such, radiological testing of the leachate at all currently established locations two times per year, in January and June, according to the site EMP shall continue to be required until such time the Department determines otherwise. As such, please modify the landfill's EMP to reflect this requirement and submit the revision to the Department for approval by August 15, 2014.

If you have any questions or concerns regarding this approval, please contact me at (585) 226-5414 or gmmaslan@gw.dec.state.ny.us.

Sincerely,


Gary M. Maslanka
Environmental Engineer
Division of Material Management

cc: Jerry Leone, Casella Waste Services
Thomas Kump, PE Chemung County DOH
Scott Foti, NYSDEC
Jason Boliver NYSDEC
Mark Domagala NYSDEC
Lisa Schwartz NYSDEC