



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 26, 2024

VIA EMAIL mcrowley@republicservices.com

County Line Landfill Partnership
Attn: Megan Crowley
Environmental Manager
7922 North Old U.S. Highway 31
Argos, Indiana 46501

Re: Request for Additional Information
County Line Landfill
Fulton County
SW Program ID 25-03

Dear Ms. Crowley:

We reviewed your minor modification application dated May 6, 2024 (VFC #[83640538](#)). Additional information and/or changes are needed before we can continue our review. The needed information or changes are identified in the enclosures.

Please email one digital copy of your response in Acrobat PDF format to Adam Weinzapfel, the Permit Manager assigned this facility, at AWeinzap@idem.in.gov. The date we receive the email will be the receipt date for your response. Please note any e-mail and its attachment(s) must total less than 20 MB in size. In place of e-mail, you may also submit your response by uploading it to a secure SharePoint folder on IDEM's website, which will then remain available to upload future applications, responses, and submittals. There is no size limitation if you use this option. Please contact Mr. Weinzapfel if you would like to set up an upload folder for your facility.

Enclosed is a signature and certification statement which must be submitted with your PDF response.

Since our goal is to provide you with as timely a permit decision as possible, we request you provide the required information by **July 3, 2024**. If you believe you cannot submit the requested information within that time frame, please contact your permit manager to arrange a schedule for submitting the information.

Indiana Code (IC) and Indiana Administrative Code (IAC) references in this document can be reviewed at iga.IN.gov. IC references are under the "Laws" link; IAC references are under the "Publications" link.



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



Public records for your facility are available in IDEM's Virtual File Cabinet (VFC) on the IDEM website. You may directly view the VFC files referenced in this request by clicking on their [hyperlinked](#) VFC numbers. You may also view the referenced VFC documents, along with other documents related to this facility, by going to <http://vfc.idem.in.gov/>, and searching on the VFC number or the facility's SW Program ID. Documents related to this request include the application dated May 6, 2024 (VFC #83640538). **Note:** all document page numbers cited are the page numbers of the PDF file referenced in VFC, not the original numbering of the document.

If you have any questions, please contact Adam Weinzapfel, the permit manager assigned this facility, by dialing (317) 232-7612 or by e-mail at AWeinzap@idem.in.gov.

Sincerely,



Thomas Kreke, Chief
Solid Waste Permits Section
Office of Land Quality

Enclosures: Engineering
Certification Statement

cc with enclosures: Fulton County Health Department
Fulton County Commissioners
Fulton County Solid Waste Management District
President, Argos Town Council

ENGINEERING ENCLOSURE
Request for Additional Information
County Line Landfill
Permit Minor Modification Application
25-03
Fulton County

Contact: Elizabeth Markert

Telephone: (317) 233-5197

Email: emarkert@idem.in.gov

Please address the following comments developed from an engineering review of your solid waste land disposal facility minor modification application, dated May 6, 2024 (VFC #[83640538](#)):

1. Address the comments below regarding the HELP Model and resubmit the calculations:
 - a) Discuss how the use of synthetic turf would change evapotranspiration and revise the model input as necessary.
 - b) Verify the assumptions made within the HELP model calculations for the ClosureTurf layer match the manufacturer's specifications. Include manufacturer's specifications.
 - c) The HELP model data provided was obtained using an older, outdated version of the HELP model. Resubmit the data using the current version of the HELP model.
 - d) Clarify why different material texture numbers are used in the model when compacted clay is a standard layer with assumptions provided by the existing material texture numbers within the HELP model assumptions.
 - e) Provide the entire HELP model analysis. Only summary information was provided within this application.
 - f) Confirm the HELP model calculations do not incorrectly assume the landfill will have a soil vegetative layer.
2. Discuss how the placement of the gas collection and control system will not be adversely affected by the use of the ClosureTurf instead of the permitted protective soil and vegetative layers.
3. Address the comments below regarding the closure/post-closure cost estimates:
 - a) The updated post-closure cost estimate removes the costs associated

with vegetation control because of the use of ClosureTurf. However, the sand infill layer placed on top of this synthetic turf must be maintained. Integrate the cost of sand replacement into the post-closure cost.

- b) The post-closure cost must include replacement cost for ClosureTurf in 20 years or based on the manufacturer's warranty period. Please note, the post-closure period may be extended in perpetuity due to the use of ClosureTurf which would require long-term maintenance and replacement.
 - c) Line g on Page 136 of the closure cost estimate has the incorrect total for the category: "Total Cost Per Acre For Acquisition, Placement & Compaction Of Final Cover Layers." Recalculate and revise this section of the closure cost estimate.
 - d) Line e on Page 157 of the post-closure cost estimate has the same cost evaluation as the currently approved post-closure cost estimate dated June 11, 2019 (VFC #[82794542](#), p. 12-23 of 23). This cost estimate must be increased for inflation. Resubmit the post-closure cost.
 - e) Neither the closure nor post-closure cost have been signed by the applicant. Resubmit the signed plans. These plans should be certified by a Professional Engineer (329 IAC 10-11-2.5(a)(3)).
4. Address the following comments regarding the proposed ClosureTurf replacement for the final cover system:
- a) Currently, about 24.3 acres of the landfill are certified closed. Will the final cover be replaced with ClosureTurf for this area? If not, how will the proposed geomembrane and ClosureTurf cover be tied to the existing geomembrane, protective soil, and vegetative cover?
 - b) How will the soil layer beneath the geomembrane be protected from the freeze-thaw cycle?
 - c) Describe how the facility will maintain the cover condition due to waste settlement. Describe how erosion will be prevented. Describe how drainage/ponding will be prevented.
 - d) How will natural vegetation growth within the sand infill be prevented and removed/controlled? Is the cost of weed control integrated within the post-closure cost estimate?
 - e) Describe whether the proposed final cover system will be able to withstand vehicle loading, particularly on the side slopes, and not damage the cover.

- f) Specify how often the facility plans to replace the ClosureTurf's infill sand (at repeated intervals or only after high winds and high intensity rainfall)?
 - g) Provide manufacturer's evaluation on UV degradation of the ClosuresTurf, and the long-term effect of weather and UV on the turf blades.
 - h) Describe how the facility will prevent final cover damage from burrowing animals.
 - i) Provide the manufacturer's recommended inspection and maintenance procedures and frequency, and the facility's inspection and maintenance plan. If these plans do not align explain why.
 - j) Describe how the facility will avoid PFAS and microplastic contamination of the stormwater structures onsite given UV degradation will deteriorate the ClosureTurf material overtime.
5. Page 149 of the application states that a total of 106.3 acres have been constructed and certified to receive waste. According to the current permit issued in 2020, 130.6 acres have been constructed and certified to receive waste. The closed acreage has not changed. Clarify this discrepancy.

Solid Waste Land Disposal Facilities Signatures and Certification Statements for Requested Additional Information

329 IAC 10-11-3(d) requires that the signatory of a solid waste land disposal facility permit application and of other information requested by or on behalf of the Commissioner (including the supplemental information requested by our office for your solid waste land disposal facility permit application) sign the following certification statement:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I further certify that I am authorized to submit this information.”

APPLICANT'S SIGNATURE

DATE

APPLICANT'S NAME TYPED

Note: It is not necessary to submit this form if an equivalent signed certification statement is incorporated into your submittal.

From: [Poe, Diane L](#)
To: mcrowley@republicservices.com
Cc: wdyson@co.fulton.in.us; blewis@co.fulton.in.us; rranstead@co.fulton.in.us; dsommers@co.fulton.in.us; fcswd@rtcol.com; csnead@townofargos.com
Bcc: [Feller, Robin](#); [Kurylo, Leo](#); [Kreke, Thomas](#); [Hummel, Lindsey](#); [Weinzapfel, Adam](#); [RAMAN, SHYAMALA](#); [Markert, Elizabeth](#); [Beard, Scott](#); [Hall, Kelly](#)
Subject: County Line Landfill Permit Mino Modification Application Request for Additional Information
Date: Wednesday, June 26, 2024 1:29:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[062624 25-03 Minor Mod RAI.pdf](#)

Attached is correspondence regarding the above property in Fulton County. A hardcopy will **not** be sent to the addressee.

If you have any questions, please contact Adam Weinzapfel, permit manager. His information is in the last paragraph on page 2 above Mr. Kreke's signature block.



Indiana Department of
Environmental Management

Diane Poe
OLQ Permits Branch Administrative Assistant
• (317) 232-4473 • dpoe@idem.IN.gov

Protecting Hoosiers and Our Environment



| www.idem.IN.gov

From: [Poe, Diane L](#)
To: "mcrowley@republicservices.com"
Cc: wdyson@co.fulton.in.us; "blewis@co.fulton.in.us"; "rranstead@co.fulton.in.us"; "dsommers@co.fulton.in.us"; "fcswd@rtcol.com"; "csnead@townofargos.com"
Bcc: [Feller, Robin](#); [Kreke, Thomas](#); [Kurylo, Leo](#); [Hummel, Lindsey](#); [Weinzapfel, Adam](#); [Hall, Kelly](#); [RAMAN, SHYAMALA](#); [Markert, Elizabeth](#); [Beard, Scott](#)
Subject: OOPS! FW: County Line Landfill Permit Minor Modification Application Request for Additional Information
Date: Wednesday, June 26, 2024 1:32:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[062624 25-03 Minor Mod RAI.pdf](#)

My apologies for the typo in the subject line on the original mailing. That should have been “minor” and not “mino”. Again, I apologize for any confusion that may have caused.

Diane Poe, Administrative Assistant
OLQ Permits Branch
(317) 232-4473
dpoe@idem.in.gov

From: Poe, Diane L
Sent: Wednesday, June 26, 2024 1:30 PM
To: 'mcrowley@republicservices.com' <mcrowley@republicservices.com>
Cc: wdyson@co.fulton.in.us; 'blewis@co.fulton.in.us' <blewis@co.fulton.in.us>; 'rranstead@co.fulton.in.us' <rranstead@co.fulton.in.us>; 'dsommers@co.fulton.in.us' <dsommers@co.fulton.in.us>; 'fcswd@rtcol.com' <fcswd@rtcol.com>; 'csnead@townofargos.com' <csnead@townofargos.com>
Subject: County Line Landfill Permit Mino Modification Application Request for Additional Information

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Indiana Department of
Environmental Management
Diane Poe
OLQ Permits Branch Administrative Assistant
• (317) 232-4473 • dpoe@idem.IN.gov

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From: [Microsoft Outlook](#)
To: mcrowley@republicservices.com
Subject: Relayed: OOPS! FW: County Line Landfill Permit Minor Modification Application Request for Additional Information
Date: Wednesday, June 26, 2024 1:32:46 PM
Attachments: [OOPS! FW County Line Landfill Permit Minor Modification Application Request for Additional Information.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
mcrowley@republicservices.com (mcrowley@republicservices.com) <mailto:mcrowley@republicservices.com>
Subject: OOPS! FW: County Line Landfill Permit Minor Modification Application Request for Additional Information