

# Sierra Club comments and questions on the Industrial Pipe Landfill Permit at the LADEQ hearing 15 July 2008



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**Industrial Pipe Landfill: AI Number 14689  
Permit Number P-0261R1**

1. The Sierra Club does not believe that this permit should be issued.
2. This proposed permit modification and the process that has us at this hearing tonight is flawed and the Louisiana Department of Environmental Quality has forgotten its main duty is to protect the people and the environment of Louisiana **NOT to issue permits of questionable merit.**
3. We should be here tonight talking about the closure of this landfill a timeline for removal of all waste on the site and protection the citizens of Oakville.
4. The idea that we will be accepting waste by barge from all across America into this landfill is unacceptable and in our opinion not authorized by the current permit or by this flawed modification of the permit
5. We believe that this proposed permit modification is a **MAJOR** modification and **NOT** a minor modification as the application states.
  - a. Since it is a Major modification there needs to be an in-depth analysis of the "IT Questions" included in this permit application.

- b. With the proposed change in language in the permit to change the “service area” of the landfill from primarily Plaquemines, Jefferson, Orleans and St. Bernard Parishes to “ barge, or other vessels. Source of this waste may include other in-state or out-of-state landfills, transfer stations, off-shore drilling platforms, river debris receiving barges and other receiving locations...” This new proposed permit wording is a MAJOR increase in the scope and size of the “service area” and therefore need a new permit not a modification of this old permit.
6. We want to know how the Industrial Pipe Landfill will be able to ensure that only permit wastes are shipped to the site.
- a. How will be waste that are not permit returned to the original location
  - b. Who will be responsible for the return shipping cost?
  - c. What kind of accountability program will the LADEQ put in place to ensure only permitted waste is shipped to this site?
  - d. Will this accountability program be any better enforced than the failed review of waste into site in the Post Katrina clean-up?
  - e. If wastes which do not comply with the permitted landfill operation are found on the site will this be cause for the Industrial Pipe Landfill to be closed down?
  - f. What limits are there on waste coming to the site?
  - g. If there are no limits could all of the “C&D Waste” from Chicago, St. Louis and other cities along the Mississippi and Ohio River systems be disposed at the site.
7. This proposed permit change of allowing the unloading of waste from the Hero Canal will violate the current permit 50 foot Buffer Zone.
8. There are additional environmental impacts that would be related to the transfer of waste from barges or other vessels to the landfill which Industrial Pipe Landfill would need additional changes in permits to operate.
- a. Liquid waste may be discharged into the Hero Canal
  - b. Solid waste maybe dropped into the Hero Canal

- c. Fuel products maybe discharge into the Hero Canal from the unloading operations or from the tugboat or other vessels bringing waste to the site.
  - d. There is no discussion of waste that could become airborne in the unloading process and then be carried off of the Industrial Pipe Landfill site.
9. The unloading of waste at the Hero Canal will not be in compliance with the current permit that requires all waste into the Industrial Waste Landfill come on to the site by the “main Gate” and the “main Gate Operator” is responsible for inspection and approving of the waste load into the site.
  10. We would like to know under what authority the Industrial Pipe Landfill accepted the barge load of waste earlier this year.
  11. In the proposed permit modification the Industrial Pipe Landfill represents that the C&D waste from the barge or other vessels will be sent to the “working face” of the landfill or to a cell adjacent to the area where the barge is being unloaded. Where in the current permit is the “cell adjacent to the area where the barge is being loaded” detailed and permitted?

These comments tonight 15<sup>th</sup> July 2008 maybe expanded by the Sierra Club and we reserve the right to file additional comment with the LA DEQ before the 18<sup>th</sup> Aug deadline.