



Alabama Department of Environmental Management  
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May 9, 2025

RE: Stone's Throw Landfill  
Title V Renewal  
Facility No. 205-0015  
Response to Comments

To Whom It May Concern:

On May 15, 2019, an application was submitted to the Air Division of the Alabama Department of Environmental Management (ADEM) for the renewal of a Title V permit for Stone's Throw Landfill. An updated application was submitted on August 28, 2024. The Draft Permit (No. 205-0015) was the subject of a public comment period beginning October 9, 2024 and ending on November 21, 2024. A public hearing was also held on November 14, 2024. Below are the responses to comments received during the comment period. The comments are summarized from written comments received.

#### **Comment 1**

The landfill has a lack of regard for the health of the neighboring community. The community is experiencing elevated levels of cancer, heart attacks, rashes, birth defects, allergies, headaches, respiratory illnesses, and other chronic illness.

#### **Response to Comment 1**

With respect to the Major Source Operating Permit (MSOP) proposed by the Air Division of ADEM, the landfill is currently meeting all regulatory requirements to control the pollutants that are generated by the landfill and have the potential to be emitted into the air. These include, but are not limited to, operating a landfill gas collection and control system (GCCS) that uses gas wells throughout the landfill to collect the gases generated by the waste and destroy them utilizing a flare. The collection system is required to be designed to be capable of collecting the gas generated within the landfill, and the flare is required to be operated so that non-methane organic compounds (NMOCs) are reduced by 98 weight-percent. The MSOP also requires the landfill to perform monitoring along the whole surface of the landfill and at each point at least once a calendar quarter where a penetration exists to locate any areas where methane may be escaping to the air in excessive amounts.

#### **Comment 2**

Commentor requests the renewal permit request be denied and the Tallapoosa County Commission reverse its 1990's decision to commit 500 acres of land to original landfill.



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## **Response to Comment 2**

A provision in Alabama law provides local governments with broad authority over the disposal of solid waste, including the location of landfills and the types of waste that will be accepted. The Tallapoosa County Commission approved the location of the landfill, the types of waste that will be accepted, and the geographical areas from which waste may be accepted.

The decisions on whether a landfill will be located at a specific site is made by the landfill owner, subject to approval by the local governing body. ADEM has no input or authority on siting a landfill other than it must act favorably on a permit application which has been properly approved by the local governing body and whose application shows that ADEM's regulations can be met.

## **Comment 3**

What does the Permittee do to make sure that the soil stays within its boundaries, its water stays within its boundaries, and the air stays within its boundaries?

## **Response to Comment 3**

The Solid Waste permit requires, as specified by ADEM Admin. Code r. 335-13-4-.13(f) and the proposed permit application, a 100-foot buffer from the edge of the waste at the active disposal area to the facility boundary. As stated above, the landfill also utilizes a GCCS to limit emissions to the air and performs monitoring of the surface of the landfill.

## **Comment 4**

Commenter claims leachate has escaped the landfill property and contaminated the soil of neighboring property. Sulfur and methane from the landfill are also dangerous. The landfill has caused members of the community to lose various business opportunities including the sale of gravel and bottled water.

## **Response to Comment 4**

As stated in earlier responses, the landfill is required to monitor the surface of the landfill for methane emissions and the control device must meet requirements for destruction efficiency for NMOCs.

## **Comment 5**

The stench and air quality are preventing the holding of services and other activities at the local Church located near the landfill.



## Response to Comment 5

Odor issues that may result from landfill operations are controlled, in part, by meeting the daily cover requirements as set forth in ADEM Admin. Code r. 335-13-4-.22 and Section III.H. of the proposed Land permit. ADEM Admin. Code r. 335-13-4-.22(1)(a)1 requires a minimum of six inches of compacted earth or other approved alternative cover material to be placed at the conclusion of each day's operation or as otherwise approved by the Department to control disease vectors, flies, odors, blowing litter and scavenging. Pursuant to this regulation, approved alternative cover material may include, but is not limited to foams, geosynthetics or waste products.

An additional measure to minimize odor and vector issues from the landfill is in the proposed Solid Waste permit. The permit requires, as specified by ADEM Admin. Code r. 335-13-4-.13(f) and the proposed permit application, a 100-foot buffer from the edge of the waste at the active disposal area to the facility boundary. This State requirement, which is not required under the federal RCRA Subtitle D regulations, is an additional odor control measure currently in place at the facility.

The Land Division of the Department also conducts at least quarterly inspections of the landfill, and the Air Division of the Department conducts at least annual inspections of the landfill to ensure compliance with the terms and conditions of the permit. During these compliance inspections, the inspector checks for the proper application of daily cover, proper operation of the landfill gas collection and control system, surface erosion on inactive cells, and for the presence of unusual odor at the landfill.

The proposed Major Source Operating Permit from Air Division also includes operational and monitoring requirements that apply to the landfill's gas collection and control system, which limits odors by destroying landfill gas.

ADEM appreciates your input into this permitting process. If you have any questions or comments, please contact John Robert Gill at (334) 271-7866 or [jrgill@adem.alabama.gov](mailto:jrgill@adem.alabama.gov).

Sincerely,



Aubrey H. White III, Chief  
Air Division

AHW/jrg