LANCE R. LEFLEUR
DIRECTOR

ROBERT J. BENTLEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

August 8, 2016

MEMORANDUM

FROM: Brent A. Watson, Chief BAW
Removals and Response Section
Environmental Services Branch

SUBJECT: Storm Debris Cleanup

To facilitate the removal of debris resulting from catastrophic natural events, the following guidance is provided and shall supersede all previous guidance the Alabama Department of Environmental Management (ADEM) has provided on this issue in the past. I am also attaching the Department's guidance on open burning and emergency disposal following natural disasters.

- Regulated solid waste debris resulting from catastrophic natural events should be removed from all impacted areas.

- Vegetative and wood waste, including but not limited to stumps, logs, limbs, brush, and leaves, are not regulated solid waste. NOTE: vegetative and wood waste described herein which are contaminated with oil or oily products is considered regulated solid waste and should be disposed of in a lined landfill approved to accept this waste stream.

- The abandonment of regulated solid waste found in storm debris constitutes the establishment of an unauthorized dump, contrary to the requirements of the Alabama Solid Wastes & Recyclable Materials Management Act. Unauthorized dumps constitute a nuisance and a public health hazard, can result in additional damage to adjacent property and structures by creating impediments in surface water courses which flood, are breeding grounds for mosquitoes and other disease carrying vectors, are targets for fires set by vandals or careless acts, and encourage additional illegal disposal with their existence. Accordingly, when establishing a disposal site for vegetative waste, regulated solid waste shall be excluded. The landowner and/or person(s) responsible for the creation, contribution to, or operation of an unauthorized dump is responsible for its abatement, whether on public or private property.

- Do not place vegetative debris in wetlands or standing water.

- Avoid erosion features or low-lying areas. If not possible, ensure no impedance of water flow.

- Other agencies, such as FEMA or the U.S. Army Corps of Engineers, may have other criteria for the establishment of a vegetative debris disposal area and it is suggested that these agencies be contacted before a site is authorized by local governments.

- If burning of the vegetative debris is to take place at these sites, the burning must comply with the ADEM "Guidelines for Open Burning of Natural Disaster Debris, July 2016," a copy of which is attached.

- Vegetative debris disposal locations should be tracked by county officials, and a map showing the locations of these sites should be sent to the ADEM Environmental Services Branch – Removals and Response Section as soon as emergency cleanup activities have decreased and time permits.

If there are questions regarding disaster debris management, please contact Brent Watson at (334) 271-7894 or by email at baw@adem.alabama.gov.

Attachments

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

Lance R. LeFleur
Director

Robert J. Bentley
Governor

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ▪ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ▪ FAX (334) 271-7950

Guidelines for Open Burning of Natural Disaster Debris

July 2016

1. These guidelines apply to the open burning of debris resulting from **catastrophic natural events**.
2. Only vegetation and untreated wood may be burned. All other materials should be disposed of by burial in a permitted landfill or a site approved by the ADEM-Solid Waste Branch for disposal. NOTE: vegetative and wood wastes described herein which are contaminated with oil or oily products should be disposed of in a lined landfill approved to accept this waste stream, or destroyed by an air curtain incinerator meeting the specific conditions described below and with the expressed written approval of the Department's Air Division.
3. Open burning, including approval of sites, should be coordinated and supervised by county officials (public health officers, county engineers, solid waste coordinators, and emergency management officials). A municipality may conduct and supervise its own open burning, following these guidelines, after approval by a county official. If there is no governmental involvement, the open burning of vegetative debris is to be conducted in accordance with paragraph 10 below.
4. Open burning sites should be as distant as possible from occupied dwellings and businesses. Recommended minimum distance is 1000 feet. Prevailing wind direction should be considered to minimize nuisance smoke.
5. Information on the county, city (if applicable), beginning burning date, estimated ending date, organization, contact, telephone number, GPS location of the site entrance along with the name and contact information of the responsible official should be e-mailed to drb@adem.alabama.gov. A form you can use is available at this e-mail address or by telephoning 334-271-7879.
6. Material to be burned should be as dry as possible. Larger piles consume the debris faster during combustion.
7. Open burning is best conducted during clear weather, preferably on days with sunshine.
8. Burning may commence or fuel added to a fire between 8:00 am & 3:00 pm. Existing fires may burn beyond 3:00 pm.
9. The use of portable air curtain incinerators is encouraged and should be considered if one or more of the following situations exist:
    a. Extended 24-hour burning is necessary.
    b. Accelerated burning is desired.
    c. Smoke is or may become a problem.
10. In those situations where governmental officials or their contractors are unable to provide vegetation removal for area residents, individual property owner requests for permission to open burn vegetative debris will be handled on a case by case basis. Each site must be inspected by an ADEM inspector before permission to open burn the debris may be authorized. Expect some delays and mandatory waiting periods. Paragraphs 3 to 5 and 9 do not apply. Telephone 334-271-7879 to request an inspection.
11. ADEM has the authority to halt or modify any open burning of disaster debris. ADEM contact for open burning is Don Barron, 334-271-7879.

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)

Lance R. LeFleur
Director

Robert J. Bentley
Governor

Alabama Department of Environmental Management
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463
Montgomery, Alabama 36130-1463
(334) 271-7700 ■ FAX (334) 271-7950

Emergency Disposal of Debris Resulting from Natural Disasters

July 2016

There is sufficient available landfill capacity within Alabama to properly manage the disposal of debris that may be generated during a natural disaster. However, in certain limited circumstances that may arise following a natural disaster, the Department acknowledges the unavailability of collection and transportation options may result in the possible need for emergency disposal sites. In these unusual circumstances, plots of land may be used for the emergency disposal of debris created during natural disasters that, due to the amount of waste generated, or the unavailability of waste collection services, would overwhelm the existing solid waste management infrastructure. Under these extraordinary conditions, the following guidelines shall apply:

- Application for use of an unpermitted site for emergency disposal of debris **must** be submitted to the ADEM Solid Waste Branch by a unit of local or state government.
- Sites to be used only for the staging of waste do not need the approval of ADEM prior to use.
- Sites to be used only for open burning do not need the approval of ADEM prior to their use, as long as the ADEM guidelines for open burning of natural disaster debris are followed.
- If regulated solid waste is burned (whether authorized or unauthorized), the operator of the site must conduct a hazardous waste determination on the ash resulting from open burning prior to closing the burn site and submit that to the ADEM Solid Waste Branch. ADEM will make a determination if the ash can remain at the site or must be removed from the site.
- If ash from open burning of regulated solid wastes is disposed of at the site, additional closure requirements, including but not limited to, an environmental covenant with ADEM in accordance with Division 5 regulations is required. Additional long-term monitoring may also be required if the ashes resulting from the burning of regulated waste are disposed on-site.
- Open burning shall not occur at a permitted landfill unless specifically approved by the ADEM Solid Waste Branch. Contact the Solid Waste Branch at 334-274-4201 for details.
- Sites to be used for disposal of regulated solid waste are to be approved by the ADEM-Solid Waste Branch prior to their use. The actual location of the site must be submitted to the ADEM Solid Waste Branch, along with any information that may be known about the site, such as proximity to residences, proximity to drinking water wells and wetlands, surface water bodies and streams. If the site is located within the 10-foot coastal zone, coordination with the ADEM-Field Operations Division must be done prior to approval.
- No hazardous wastes or putrescible wastes may be disposed of in these approved emergency disposal sites.
- Waste shall not be placed in groundwater if the site is excavated. Waste shall not be placed in wetlands.
- The disposal site must be closed in accordance with ADEM regulations for closure of a permitted construction/demolition landfill. For sites where regulated solid waste was disposed, the owner of the property will be required to conduct post-closure care of the site for a period of time, to be determined by ADEM based on the types of waste disposed of and the location of the site, up to 30 years after the site is closed. Additionally, an environmental covenant will be required following closure in accordance with ADEM-Division 5 regulations.
- The entity responsible for the disposal site must report to the ADEM-Solid Waste Branch once per month the activities that have occurred at the site for the previous month. ADEM will specify what is to be reported on a case-by-case basis.

The use of a site in an emergency situation does not imply that ADEM will approve the site as a permitted landfill. Following the cessation of emergency disposal activities, the site must comply with the permit application requirements of ADEM Administrative Code, Division 13 in order to operate as a permanent landfill.

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
(205) 942-6168
(205) 941-1603 (FAX)

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, AL 35603-1333
(256) 353-1713
(256) 340-9359 (FAX)

Mobile Branch
2204 Perimeter Road
Mobile, AL 36615-1131
(251) 450-3400
(251) 479-2593 (FAX)

Mobile-Coastal
3664 Dauphin Street, Suite B
Mobile, AL 36608
(251) 304-1176
(251) 304-1189 (FAX)