

August 21, 2014

Jean-Pierre L. Oriol
Director, Coastal Zone Management
Department of Planning and Natural Resources
8100 Lindberg Bay, Ste. 61
St. Thomas, VI 00802

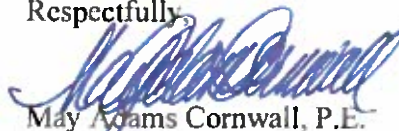
**Re: Major Coastal Zone Management Permit Application Review
CZM Major Permit Application No. CZJ-03-14 (L) and CZJ-04-14CZJ
Construction of a Marina and Associated Facilities
Parcels 13 Remainder, 13A, 13B, 10-17 & 10-18, 10-19 and 10-41 Remainder
Coral Bay, St. John, VI**

Dear Director Oriol:

The Virgin Islands Waste Management Authority (VIWMA or the Authority) has completed its review of the Environmental Assessment Report (EAR) for the abovementioned Major Permit Application, which was submitted to the Department of Planning and Natural Resources - Coastal Zone Management (DPNR-CZM). The data and supporting statements made in the EAR present no major environmental concerns for the Authority. To ensure the proper disposal of any solid waste and waste water from this project, we have attached guidelines for the permittee to use. If there are any special conditions associated with the project, the enclosed document will establish those guidelines.

Should you have any questions or concerns, please contact our Solid Waste Director, Mario Leonard, at (340) 715-9100; or our Compliance Manager, Dr. Nadine Noorhasan, at (340) 712-4962.

Respectfully,



May Adams Cornwall, P.E.
Executive Director

MAC/JAG/nn/ml

Enclosure: 1

xc: Steven Aubin, Chief Operating Officer, VIWMA
James Grum, Chief Engineer, VIWMA
Mario Leonard, Director Solid Waste St. Thomas, VIWMA
Dr. Nadine Noorhasan, Compliance Manager, VIWMA

VIWMA SOLID WASTE & WASTE WATER DISPOSAL POLICIES AND PROCEDURES

Major Permit Application No. STJ-EAR-CZJ-03-14(L) & CZJ-04-14CZJ
Construction of a Marina and Associated Facilities

SECTION I: Solid Waste Guidelines

- (1) A Waste Stream Management Plan must be submitted to VIWMA prior to construction activities described therein. For more information on the proper disposal of solid waste and the waste stream management plan, contact our Solid Waste office at (340) 715-9141.
- (2) Please note that the facility/generator must submit a completed Construction & Debris (C&D)/Nonhazardous Special Waste Application to the Authority prior to construction activity. All construction material is considered Special Waste. *Special waste is defined as any solid waste, which is designated as such and regulated in this Subchapter (Title 19 Chapter 56, Section 1560-1). It includes solid wastes that are difficult to handle, require special precautions because of their properties or the particular nature of the wastes create solid waste management problems.* Additional testing or documentation of the nonhazardous waste may be required. Upon receipt of all necessary application information, the Authority will issue a permit to the facility/generator to allow for disposal at the landfill. The Application fee is \$150.00 in addition to any vehicles that needs to be licensed/permitted by the Authority to enter into the Landfills. All Nonhazardous Special Waste is subject to \$50.00 per ton and must be accompanied by a Waste Manifest once transported to the Landfill.
- (3) The facility/generator must also hire a hauler licensed by the Authority or the facility/generator can have its own vehicles licensed by the Authority to collect and dispose of the Nonhazardous Special Waste at the Landfills.
- (4) Once tipping fees are instituted by the Authority, all users will be required to pay this fee.
- (5) Green waste shall be reduced to 4-foot lengths or mulched prior to disposal. Contact shall be made with the Landfill Operator prior to disposal for green waste in excess of 10-20 or 6-30 cubic yard loads. Green waste in excess of the above referenced shall require an approved Special Waste Disposal Permit.
- (6) Construction and demolition waste shall be reduced to 4"x4"x4" or pulverized with the removal of all metals prior to disposal.
- (7) Pallets/wood scraps shall be reduced to 4"x4"x4" prior to disposal.
- (8) No mixed loads are allowed into the landfill. Waste stream shall be screened and sorted with all categories quantified.

- (9) Unacceptable waste include: Appliances with Freon, Asbestos, Batteries, Construction and demolition (C & D) waste (unless reduced to 4"x4"x4"), Flammable paint, Fluorescent bulbs, Gas cylinders (unless punctured or the top is cut off), Grease (such as used cooking oil), Junked cars (unless the fluids are drained and tires and batteries are removed), Medical waste, Liquid waste, Yard waste (unless reduced to 4-feet or less in length), Used oil, and Scrap tires.
- (10) A completed "Waste Manifest" shall accompany waste to the disposal facility.
- (11) Applicant shall adhere to Landfill and Transfer Station Operating Procedures for Solid Waste Haulers.
- (12) Only solid waste of a nonhazardous form will be accepted at the landfill. All hazardous waste must be separated from the rest of the waste stream and disposed of through a permitted hauler, who can transport the hazardous waste out of the Territory. Please contact DPNR or the Office of Compliance at VIWMA for a list of these vendors.
- (13) All dredging material/fill/dirt material must undergo the *Toxicity Characteristic Leaching Procedure (TCLP)* test in addition to the liquid waste passing the paint filter test. Analytical data shall be transmitted to the Office of Compliance prior to disposal. ***Liquids that do not pass the Paint Filter Test are prohibited.*** Once the material passes the TCLP and Paint Filter Test and the facility plans to dispose of the material at the Landfill, then the facility/generator must complete and submit a Nonhazardous Special Waste Application to the Authority prior to disposal.
- (14) If the construction site requires blasting/detonation, any waste material from this procedure cannot be disposed of at the landfill. This type of material would be considered hazardous material. Please note that the Authority does not accept any hazardous material and licensed hauler/vendor can accept the hazardous waste. Please contact DPNR or the Office of Compliance at the Authority for a list of those vendors.
- (15) All sites that require demolition must undergo asbestos and lead clearance for buildings from DPNR. Copies of the demolition permits and clearance letters from DPNR in addition to the analytical data and a completed Nonhazardous Special Waste Application must be provided to the Authority prior to disposal of the material at the Landfills.
- (16) The Authority encourages recycling/reusing of material. Please contact the Office of Compliance or Office of Communications to get a copy of the recycling facilities in the Territory.

SECTION II: Waste Water Guidelines

- (1) Even if the facility has its own individual treatment facility, there are occasions when the treatment plant would not be operational and would require pumping out. Please note the generator/facility is required to have a completed wastewater application filed with the Authority prior to disposal at the Waste Water Treatment Plant (WWTP). The Application fee is \$150.00 in addition to any vehicles that needs to be licensed/permitted by the Authority to enter into WWTP. All waste is subject to \$75.00 per 1,000 gallons and must be accompanied by a Waste Manifest.
- (2) The facility/generator must also hire a hauler licensed by the Authority or the facility/generator can have its own vehicles licensed by the Authority to collect and dispose of the waste at the WWTP.
- (3) The facility/generator will not be permitted to dispose of: the following: mixed waste, waste from two or more waste streams; hazardous waste or waste with chemical additives; and waste that contains grease, oils, and fats, including pump outs from food preparation and grease traps.
- (4) The facility/generator shall follow the procedures by the WWTP plant operators.
- (5) A completed "Waste Manifest" shall accompany each waste load to the WWTP.
- (6) All loads are subject to fees instituted by the Authority.
- (7) All loads may be subject to sampling and analysis by the receiving facility, by VIWMA, or by the regulatory agencies, DPNR or U.S. Environmental Protection Agency (EPA).
- (8) All waste shall be disposed on in accordance with the Authority's "Guidelines for the Handling and Disposal of Wastewater."