WM Mobile Bay Environmental Center, Inc.
Chastang Landfill
17045 Highway 43
Mount Vernon, AL 36560
(813) 786-6807

September 5, 2025

Commissioner Merceria Ludgood, District 1
Commissioner Connie Hudson, District 2
Commissioner Randall Dueitt, District 3
Mobile County Commission
205 Government Street, 10th Floor
Mobile, AL 36644

RE: Chastang Sanitary Landfill - Application for Permit Modifications

Dear Commissioners:

On behalf of the Solid Waste Disposal Authority of the City of Mobile (the "SWDA"), WM Mobile Bay Environmental Center, Inc. submits the following analysis of the considerations set forth in Alabama Code § 22-27-48(c) with respect to the application for permit modifications for the Chastang Sanitary Landfill. The SWDA is the Owner and Permittee of the Chastang Sanitary Landfill, located on Highway 43 in Mobile County, Alabama.

The Chastang Landfill is professionally operated by WM Mobile Bay Environmental Center, Inc., ("WM Mobile Bay"), a subsidiary of Waste Management, Inc., ("WM"), pursuant to the Solid Waste Management Contract submitted with the permit modification application. WM Mobile Bay has managed the landfill since 1993 and is in full regulatory compliance with all ADEM and EPA regulations. The modifications requested in the permit modification application would benefit both Mobile County and the SWDA by increasing the tax revenue for Mobile County and increasing the royalties paid to the SWDA through additional volumes of waste coming from outside Mobile County, thus reducing the overall costs of waste disposal services for the citizens of Mobile.

Proposed Modifications

The permit modification application seeks the following modifications:

A. Expand the geographic service area from Mobile County to include Baldwin, Clarke, Choctaw, Conecuh, Covington, Escambia, Monroe, and Washington Counties in Alabama; Escambia, Okaloosa, Santa Rosa, and Walton Counties in Florida; and Jackson, Harrison, Hancock, George, and Greene Counties in Mississippi.

B. Increase the maximum daily volume of waste from 1,725 tons/day to 5,000 tons/day.

WM Mobile Bay addresses the specific conditions set forth in Alabama Code § 22-27-48(c) as follows:

1. **The consistency of the proposal with the jurisdiction's solid waste management needs as identified in the Mobile County Solid Waste Management Plan.**

   Response: The proposed modifications are consistent with Mobile County's solid waste management needs as identified in the Mobile County Solid Waste Management Plan ("MCSWMP") in many respects:

   "Assuring the availability of duplication of collection and disposal resources to provide competition in the costs control of collection and disposal are also a goal of this Plan." (MCSWMP at pp. 8-9.) Expanding the Chastang Landfill's service area to the 17 contiguous counties and increasing the maximum daily volume to 5,000 tons is consistent with the other landfills in the area and ensures that the Chastang Landfill can compete on a level playing field. This benefits customers and the community as a whole by providing greater options for cost-effective waste disposal.

   The MCSWMP states: "Considering the disposal cost of municipal sanitary waste, it is in the residents' best interest to keep waste generated outside the county from using space at the 'local' [Chastang] landfill." (MCSWMP at p. 10.) In reality, the opposite is true. Indeed, the cost of constructing and maintaining a Subtitle D sanitary landfill with lined cells, leachate collection systems, and methane gas collection systems is high. However, since the landfill earns revenue on a per ton basis, increasing the volume of waste deposited reduces the cost per ton of constructing and operating the landfill, thus making the landfill more economically viable. In addition, the SWDA has recently partnered with Vitol/BMP to establish a methane gas capture and recovery facility at the Chastang Landfill. Rather than burning off the methane gas produced in the waste mass at the landfill, this facility will capture and reuse the gas as a renewable source of green energy. The additional volume of waste coming from a broader service area would increase the amount of methane gas available to be captured and sold, thus ensuring the economic viability of the project. Therefore, allowing waste generated outside Mobile County to be deposited at the Chastang Landfill is in the residents' long-term best interest.

   "One of the main solid waste management concerns in Mobile County is the capacity assurance of landfills." (MCSWMP at p. 7.) "The Mobile County Commission remains committed to insuring that there is always at least 20 years of available capacity in the local sanitary landfill." (MCSWMP at p. 9.) Expansion of the Chastang Landfill's service area beyond Mobile County would not have a detrimental impact on the capacity of the landfill or the citizens it serves. The landfill is currently permitted to accept 1,725 tons of waste per day, but currently only receives an average of 740 tons per day. Even with the anticipated additional tonnage as a result of the service area expansion, it would still have a useful life of more than 50 years without any expansion of the landfill footprint.

2. **The relationship of the proposal to local planned or existing development, or the absence thereof, to major transportation arteries and to existing state primary and secondary roads.**

   Response: The Chastang Landfill is located on Hwy. 43 in a highly industrialized area of the County. Hwy. 43 is a major transportation artery, and its close proximity to Interstate 65 and Interstate 10 facilitates the safe transportation of the waste from the proposed counties without the need to traverse through more urban or residential areas on secondary roads.

3. **The location of the facility in relationship to existing industries in the state that generate large volumes of solid waste, or the relationship to the areas projected for development of industries that will generate solid waste.**

   Response: The facility's proximity to large-volume industrial waste generators lends itself to servicing those customers efficiently and cost-effectively. The Chastang Landfill currently services 7 large-volume industrial customers in the area. The proposed modifications to the landfill's service area would enable the landfill to approach at least 19 additional large-volume industries in the vicinity to potentially service their waste disposal needs.

4. **Cost and availability of public services, facilities and improvements required to support the proposed modifications and protect public health, safety, and the environment.**

   Response: As no new processes will be implemented, existing public services, facilities and improvements are sufficient to support the proposed modifications, so it is not anticipated that there will be any need to expand public services to the facility. For example, the disposal of municipal solid waste in outside cells does not require a great deal of electrical power, so any increase in the volume of waste should have almost no impact on the consumption of electricity by the landfill.

   It is anticipated that the increased volume of waste will increase the volume of methane gas that must be extracted from the landfill; however, that increased volume will be captured and recovered by the new facility operated by Vitol/BMP, which will fund all costs associated with capturing, processing, and transporting the methane gas produced by the increased waste volumes.

   It is also anticipated that the increased volume of waste will increase the volume of leachate produced at the landfill. The leachate produced at the landfill is currently captured and transported to the Mobile Area Water and Sewer System ("MAWSS") for treatment in accordance with environmental regulations. Additional leachate volume that is anticipated to be produced by the increased volume of waste will continue to be treated and disposed primarily by MAWSS; however, other disposal outlets are available and will be utilized as needed. WM Mobile Bay, in conjunction with Vitol/BMP, commits to fund all additional costs for transportation and treatment of the increased volumes of leachate.

5. **The impact of proposed modifications on public safety and provisions made to minimize the impact on public safety.**

Response: Municipal Solid Waste ("MSW") landfills are essential components of modern waste management systems, providing a controlled environment for the disposal of household, commercial, and non-hazardous industrial wastes. These landfills are highly regulated and permitted by state and local authorities to ensure environmental and public safety. MSW landfills must adhere to strict design, operational, and monitoring protocols. These typically include:

- *Engineered liners and leachate collection systems to prevent groundwater contamination;*
- *Gas collection and control systems to capture methane and other landfill gases;*
- *Daily cover requirements to minimize odors, litter, and vector attraction; and*
- *Routine environmental monitoring (groundwater, surface water, air).*

As a currently permitted MSW landfill, the facility already has the required design and operational controls in place to minimize and prevent any impact on public safety. The proposed modifications will not impact the effectiveness of the current design and operational controls to protect the public and surrounding community.

With respect to increased truck traffic on Hwy. 43 as a result of the proposed modifications, we believe the potential impact would be negligible. According to information obtained from ALDOT, the AADT (annual average daily traffic) for this corridor is 15,600 trips per day. The volume of all truck traffic on Hwy. 43 (including trucks going to and from the landfill as well as other locations) is approximately 10% of total traffic.

As a snapshot example, during the 7-day timeframe from January 11-18, 2024, ALDOT's total traffic count for this section of Hwy. 43 was more than 102,000 trips. During that timeframe, 232 loads of waste were delivered to Chastang Landfill (for a total of 464 trips, coming and going). This is less than 0.5% of total traffic. Even an increase of 1,000 tons of waste per day (which is unlikely) would result in approximately 65 additional trucks (130 total trips) per day. This would raise the ratio to just under 0.6% of total traffic, which is still a negligible amount.

As the operator of the Chastang Landfill, WM Mobile Bay strives to continuously improve safety measures to ensure the well-being of our employees and our communities. WM safety programs begin with comprehensive new-hire onboarding programs and ongoing initiatives to help educate employees on safety best practices. WM embeds safety in all actions through regular safety communications and by monitoring compliance and assessing risk potential with leading metrics, such as risk scores and behavior-based safety observations, which assess employee behavior and offer opportunities for coaching.

WM implements rigorous training programs, conducts frequent safety audits, maintains proactive maintenance schedules, and provides its employees with industry-leading technology and resources. Additionally, WM continues to enhance the safety of its fleet operations through investments in collection vehicles, heavy equipment, and advanced mapping technology to help drivers navigate their routes safely.

CEI Transport is one of WM's key vendors and haulers of MSW into the Chastang Landfill. CEI currently has LYTX video telematics and fleet management software installed in all tractor trailers that operate on a public roadway. Beginning this year, new trucks are equipped with Samsara, which is a 360-degree camera system with AI technology, and brake assist, all focused on improving safety on our roads through utilization of the most advanced technology

6. **The social and economic impacts of the proposed modifications on the affected community, including changes in property values, and social or community perception.**

Response: The proposed modifications involve an existing landfill facility and, therefore, do not introduce a new operation or create additional land use concerns for the affected community. The size of the landfill itself would not change. Since the facility is already in operation, the proposed modifications will not cause adverse impacts to property values or introduce new community concerns.

Importantly, the proposal provides a unique opportunity to generate direct economic benefit for Mobile County. As part of this request, WM Mobile Bay is voluntarily offering a "host fee" on all new volume received from the expanded service area, excluding volumes from within the current host county, Mobile County. This fee will be applied on a per-ton basis, creating a new, consistent revenue stream for the County. This new revenue source could be used at the County's discretion to fund community improvements, infrastructure projects, or other initiatives that directly benefit residents. As such, the proposal has the potential to positively impact both the social and economic environment of the surrounding community.

As described above, the SWDA has recently partnered with Vitol/BMP to establish a methane gas capture and recovery facility at the Chastang Landfill. Rather than burning off the methane gas produced in the waste mass at the landfill, this facility will capture and reuse the gas as a renewable source of green energy. The additional volume of waste coming from a broader service area would increase the amount of methane gas available to be captured and sold, thus ensuring the economic viability of the project.

In summary, the proposed expansion provides the County with a sustainable new revenue source without adding new burdens to the community, while also offering the potential for long-term social and economic benefits.

We trust that this response allows the application to be deemed complete. Please contact me at (813) 786-6807 if you have any questions regarding this correspondence.

Sincerely,

Michele H. Lersch

Michele Lersch
Environmental Protection Manager

cc: file