



**State of Tennessee**  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**KNOXVILLE ENVIRONMENTAL FIELD OFFICE**  
**3711 MIDDLEBROOK PIKE**  
**KNOXVILLE, TENNESSEE 37921-6538**

February 22, 2018

CERTIFIED MAIL  
7017 0190 0000 3447 2768

Mr. Bob Shires, Region Vice President  
Waste Corporation of America  
1550 Lamons Quarry Lane  
Knoxville, TN 37932

RE: Notice of Incompleteness Major Permit Modification Application  
Vertical Expansion F-2 Phase  
Yarnell Road Demolition Landfill, DML 47-0069

Dear Mr. Shires:

The Division of Solid Waste Management (DSWM) has reviewed the requested modification to raise the grades in Phase F-2 as presented by SCS Engineers on January 29, 2018. The permit application for the facility has been reviewed for compliance with the Tennessee Solid Waste Disposal Act, Tennessee Code Annotated § 68-211-101 *et seq.* and with the Tennessee Solid Waste Regulations, Rule Chapter 0400-11-01, and has deemed the application as incomplete. Please provide the items identified to allow the application to be further evaluated with revised or new pages clearly identified.

If you have any questions, please do not hesitate to contact me at (865) 594-5474.

Sincerely,

Handwritten signature of Paula Plont in black ink.

Paula Plont  
Environmental Consultant  
Division of Solid Waste Management

Handwritten signature of Revendra Awasthi in blue ink.

Revendra Awasthi  
Environmental Field Office Manager  
Division of Solid Waste Management

cc: DSWM NCO via electronic mail  
Steve Lamb, P. E. SCS Engineers

### Review Comments

- Pond 3 appears have a slight increase in drainage area as well as altered excavation grades depicted. Please include all Pond 3 design elements for review.
  - Show on Sheet 5 the existing sediment pond's outlet structures (principal and emergency Spillway). Provide a detailed cross sectional view.
  - Provide the pond's dewater time and the data to confirm the new volume will have adequate capacity to meet the required runoff volume resulting from a 25-yr/24-hr storm event for wet and dry storage.
  - Provide a sediment clean-out marker in the pond.
  - Include the plan for the maintenance and cleaning schedule in the operations and cost analysis.
  
- Please include the seasonal adjusted high groundwater level on the cross sectional view sheets.
- Some cross sectional view of the two drop pipes planned for use on the east slope is needed. Will the pipes be buried fully or partially? Will there be a head wall to direct flow into the pipe and prevent the flow around or over? Uplift analysis was not found in the application. What is the downgradient structure capacity/size?
- Detail views of the cap and gas vents do not show the intermediate cover thickness. Some thickness of the bi-monthly or intermediate cover would be present and would need to be depicted in this major modification's application.
- Some portion of the southwest slope exceeds 100 feet in length and ~ 35 feet height differential desired for final cap designs. This flow must be intercepted in some manner.
- The final cover contour sheets show the waste footprint in the western area by both the dashed line and the red line. The dashed line should be shifted inward to the new functional limits to Phase F-2. To this end only one line would be needed this boundary.
- Soil balance at the site is understood to be limited and costs for obtaining the soils during closure have been included. Please include some assessment of how much soils remain onsite and/or include an estimate for the bi-monthly cover soils to be obtained off-site for the remainder of this site's operating life and include those costs. Under the Rules, the plans are to depict a soil storage area. Very limited area remains for such use on the property. If the area up-gradient to Pond 3 will serve this purpose, the current use as exempt fill must end at some planned grade. Provide those details. Sufficient stabilized cover will be needed for both footprint and this exempt fill area. Steep slopes for this area or loss of stored soils will justify additional pond cleaning events.
- Please specify in the Closure Plan, Section 4.0, the professional engineer would be registered in the State of Tennessee and any survey performed to confirm the final cap thickness would be performed by a surveyor licensed in the State of Tennessee.
- Bench mark located at the site must be shown on at least one drawing as that element will be the reference point for the closure elevations.