



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
MEMPHIS ENVIRONMENTAL FIELD OFFICE**

**8383 WOLF LAKE DRIVE  
BARTLETT, TN 38133-4119  
PHONE (901) 371-3000 STATEWIDE 1-888-891-8332 FAX (901) 371-3170**

December 17, 2019

Mayor Jimmy Sain  
Hardeman County  
P.O. Box 250  
Bolivar, TN 38008

**CERTIFIED MAIL # 91 7108 2133 3932 2042 8147  
RETURN RECEIPT REQUESTED**

**RE: FOLLOW UP COMPLIANCE EVALUATION INSPECTION  
THIRD NOTICE OF VIOLATION  
HARDEMAN COUNTY LANDFILL  
SNL350000223**

Dear Mayor Sain:

On November 19, 2019, the Division of Solid Waste Management (DSWM) conducted a follow up compliance evaluation inspection at your facility. During the course of the inspection it was discovered that the compliance agreement between Hardeman County Solid Waste and the Division of Solid Waste Management dated September 27, 2019, and extended on October 4, 2019, had not been fulfilled. Specifically, leachate was observed on the site, leachate was observed entering the run-off system, the run-on/run-off system was inadequately maintained, and erosion was inadequately controlled.

This case will be referred to the Division's Enforcement Section due to continued and repeated non-compliance. Please be aware that Tennessee Code Annotated §68-211-117 authorize the Department of Environment and Conservation to take enforcement action, including assessment of a civil penalty of up to FIVE THOUSAND DOLLARS (\$5,000.00) per day, for violation of the *Tennessee Solid Waste Disposal Act*.

If you have any questions or comments concerning this correspondence, please contact me by email at [John.boatright@tn.gov](mailto:John.boatright@tn.gov) or by phone at 901-371-3011.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Boatright", is written over a horizontal line.

John Boatright, P.E.  
Environmental Consultant II

ENCL: Inspection Report

CC: JB/nb/07912162019

Rick Witson, DSWM, Interim Deputy Director of Field Office Operations  
Chris Lagan, DSWM – Enforcement  
Clifton Jeter, EFOM, DSWM, JFO  
Joellyn Brazille, EFOM, DWR, MFO  
Kenny Brown Director, Hardeman County Solid Waste

## **SOLID WASTE INSPECTION REPORT**

### **SITE/PHYSICAL LOCATION**

Bolivar-Hardeman County Landfill  
SNL350000223  
75 Landfill Lane  
Bolivar, TN  
731-658-2884

### **PRIMARY CONTACT**

Kenny Brown  
Director  
Hardeman County Department of Solid Waste  
100 N. Main Street  
Bolivar, TN 38008

### **DATE/TIME OF INSPECTION**

November 19, 2019, at 10:15 a.m.

### **INSPECTION PARTICIPANTS**

Kenny Brown, Director, Hardeman County Solid Waste  
Nathan Jordan, Site Operator  
John Boatright, P.E., DSWM

### **REPORT PREPARED BY**

John Boatright, P.E.  
Division of Solid Waste Management  
Memphis Environmental Field Office  
8383 Wolf Lake Drive  
Bartlett, TN 38113  
901-371-3011

### **PURPOSE OF INSPECTION**

This inspection was conducted to evaluate the solid waste disposal facility's compliance with the applicable requirements of the rules and regulations promulgated pursuant to the *Tennessee Solid Waste Disposal Act*, to evaluate the status of violations noted in previous inspections, and to evaluate Hardeman County Solid Waste's fulfillment of the compliance agreement dated September 27, 2019.

## **FACILITY DESCRIPTION**

Hardeman County Landfill (SNL 350000223), is a permitted Class I Landfill. The landfill can not accept regulated hazardous waste. The landfill currently has 3 active special waste approvals (1 “one time” and 2 continuous disposal). The landfill is not presently receiving waste.

The landfill property consists of 163 acres, with 19 acres of permitted waste disposal in the current built landfill area. An older pre subtitle D landfill area has been closed. The current landfill consists of four constructed phases. Phase I has received final cover. Phases II and III are in operation. Phase IV has been constructed but not approved to receive waste. Phase IV is scheduled to be reconstructed to achieve approval to receive waste.

## **INSPECTION FINDINGS**

During the course of the inspection the following violations were identified.

### **Division Rule 0400-11-01-.04(2)(i)6.**

- (2) General Facility Standards - Unless specifically noted otherwise, the standards of this paragraph apply to Class I, Class II, Class III, and Class IV disposal facilities.
  - (i) Run-on, Run-off, and Erosion Control
    - 6. The operator must take other erosion control measures (e.g., temporary mulching or seeding, silt barriers) as necessary to control erosion of the site.

### **Violation Observation:**

Inadequate Erosion Control – Erosion was observed on the East and North slopes of the landfill. While some temporary erosion control measures were observed at the time of the inspection, the measures taken are inadequate to prevent erosion. Specifically the flow lengths on the east face are at least 200 feet long and on the north face at least 100 feet long. The erosion is occurring at the bottoms of these slopes despite the matting and straw placed at the top of the slopes (photographs 4 thru 10). Additionally, the perimeter road is washed out on the east side and is covered in sediment on the north side.

The facility will continue to spend employee and equipment time excavating, placing and replacing cover material until it establishes a viable storm water pollution prevention plan to minimize erosion on site. The Tennessee Erosion Prevention and Sediment Control Training Program (available at <https://tnepsc.org/index.asp>) provides valuable training on preventing erosion.

This violation is a repeated violation during this inspector’s tenure at this facility and an examination of the record shows it to have been seasonally cited previously.

**Division Rule 0400-11-01-.04(2)(a)(3).**

- (2) General Facility Standards - Unless specifically noted otherwise, the standards of this paragraph apply to Class I, Class II, Class III, and Class IV disposal facilities.
  - (a) Overall Performance Standard - The facility must be located, designed, constructed, operated, maintained, closed, and cared for after closure in such a manner as to minimize to the extent practicable:
    - 3. The potential for releases of solid wastes, solid waste constituents, or other potentially harmful materials to the environment except in a manner authorized by state and local air pollution control, water pollution control, and/or waste management control agencies.

**Violation Observation:**

Solid Waste Exposed – The erosion of phases II and III cover had exposed waste during the inspection (photographs 5 and 7). This exposed waste is on the lower slope of the east and north slopes where the erosion of the intermediate cover is greatest.

**Division Rule 0400-11-01-.04(6)(a)3 and 5.**

- (6) Waste Handling and Cover Standards -
  - (a) Class I Disposal Facilities -
    - 3. Except for those completed portions to be finally closed (e.g., the final lift), all surfaces which will be left exposed for a period of over thirty days (e.g., initial and intermediate lifts) must be covered by an intermediate cover consisting of at least a one-foot layer of compacted soil or other material approved by the Commissioner.
  - And
  - 5. All initial and intermediate cover depths must be maintained until either additional wastes are placed over the area or final cover is applied.

**Violation Observation:**

Unsatisfactory Intermediate Cover – Phase II and most of phase III have had intermediate cover recently applied during this inspection and during previous inspections. The soil

type and long flow lengths have resulted in excessive erosion and the exposure of solid waste.

**General Comments:**

On September 4, 2019, a Compliance Review Meeting was held in the Jackson Field Office. In that meeting Hardeman County agreed to completely cover the east and north faces of the landfill, to plant grass, and take other erosion control measures as appropriate by October 4, 2019, and complete the perimeter road and run-off control ditch by November 4, 2019. An extension for the cover activities was granted until November 4, 2019.

SIGNED: 

DATE: 17 DEC 19

John Boatright, P.E.  
Environmental Consultant II  
Tennessee Department of Environment and Conservation  
Division of Solid Waste Management  
Memphis Environmental Field Office

REVIEWED: 

DATE: 12/17/2019

Herb Nicholson, P.G., CHMM  
Environmental Field Office Manager  
Tennessee Department of Environment and Conservation  
Division of Solid Waste Management  
Memphis Environmental Field Office

**Attachments:**

- (1) Facility Evaluation Form
- (2) Photographs of violations

Initial Inspection

**TENNESSEE DIVISION OF SOLID WASTE MANAGEMENT**  
**CLASS I FACILITY INSPECTION CHECKLIST\***

**CLASS I  
FACILITY**

SITE		DATE 20191119	TIME 10:15	WEATHER 60's PC
Bolivar-Hardeman County Landfill SNL350000223 75 Landfill Way Hardeman				EFO MEMPHIS
*SEE DISCLAIMER ON LAST PAGE				
VIOLATION		REGULATION		OBSERVATION NVO AOC V1 V2
BUFFER ZONE STANDARDS FOR SITING LANDFILLS				
8310	BUFFER ZONE STANDARD VIOLATED	0400-11-01-.04(3)(a)		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
COLLECTED LEACHATE				
8330	LEACHATE IMPROPERLY MANAGED	0400-11-01-.04(4)(a)8(i-iii) ?		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
8340	INADEQUATE LEACHATE COLLECTION SYSTEM	0400-11-01-.04(4)(a)7 ?		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
COMMENTS	See 8570			
COMMUNICATIONS				
8130	NO COMMUNICATION DEVICES	0400-11-01-.04(2)(f) ?		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
COVER MATERIAL				
8160	UNAVAILABILITY OF COVER MATERIAL.	0400-11-01-.04(2)(h) ?		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
DEAD ANIMALS				
8250	DEAD ANIMALS IMPROPERLY HANDLED	0400-11-01-.04(2)(k)5.(ii) (I-III) ?		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
DUST CONTROL				
8190	INADEQUATE DUST CONTROL	0400-11-01-.04(2)(j) ?		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
DUTY TO PROVIDE INFORMATION				

\*SEE DISCLAIMER ON LAST PAGE

VIOLATION		REGULATION	OBSERVATION			
			NVO	AOC	V1	V2
<b>DUTY TO PROVIDE INFORMATION</b>						
<b>8530</b>	UNSATISFACTORY RECORDS OR REPORTS	0400-11-01-.02(5)(a)7 TCA 68-211-862(a)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8590</b>	PERMITS, PLANS, OPERATING MANUAL NOT AVAILABLE	0400-11-01-.02(5)(a)(7)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>FIRE SAFETY</b>						
<b>8080</b>	EVIDENCE OF OPEN BURNING	0400-11-01-.04(2)(c)1	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8090</b>	INADEQUATE FIRE PROTECTION	0400-11-01-.04(2)(c)2	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>GAS MIGRATION CONTROL STANDARDS</b>						
<b>8380</b>	INADEQUATE GAS MIGRATION CONTROL SYSTEM	0400-11-01-.04(5)(a)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8390</b>	INADEQUATE MAINTENANCE OF GAS MIGRATION CONTROL SYSTEM	0400-11-01-.04(5)(a)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>GENERAL FACILITY STANDARDS</b>						
<b>8010</b>	INADEQUATE VECTOR CONTROL	0400-11-01-.04(2)(a)1	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8020</b>	ACCESS NOT LIMITED TO OPERATING HOURS	0400-11-01-.04(2)(a)4	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8030</b>	INADEQUATE ARTIFICIAL OR NATURAL BARRIER	0400-11-01-.04(2)(b)1	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						

\*SEE DISCLAIMER ON LAST PAGE

VIOLATION		REGULATION	OBSERVATION			
			NVO	AOC	V1	V2
<b>GENERAL FACILITY STANDARDS</b>						
<b>8040</b>	INADEQUATE INFORMATION SIGNS	0400-11-01-.04(2)(b)2 TCA 68-211-703(h)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8050</b>	UNSATISFACTORY ACCESS ROAD(S)/PARKING AREA(S)	0400-11-01-.04(2)(b)3	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8060</b>	CERTIFIED PERSONNEL NOT PRESENT DURING OPERATING HOURS	0400-11-01-.04(2)(b)5	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8070</b>	UNAPPROVED SALVAGING OF WASTE	0400-11-01-.04(2)(b)6	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>LITTER CONTROL</b>						
<b>8110</b>	UNSATISFACTORY LITTER CONTROL	0400-11-01-.04(2)(d)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>OPERATING EQUIPMENT</b>						
<b>8140</b>	INADEQUATE OPERATING EQUIPMENT	0400-11-01-.04(2)(g)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8150</b>	UNAVAILABILITY OF BACKUP EQUIPMENT	0400-11-01-.04(2)(g)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>OVERALL PERFORMANCE STANDARD</b>						
<b>8270</b>	EXPOSED SOLID WASTE	0400-11-01-.04(2)(a)(3)	?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS Waste in the interface between phases II and III and IV are exposed. <b>This item is addressed in the Phase IV renovation plan.</b> Additional areas of exposed waste have occurred on the north face of the landfill.						
<b>8320</b>	INADEQUATE MAINTENANCE OF LEACHATE MANAGEMENT SYSTEM (INSPECTOR TO CHECK AND RECORD LEACHATE LEVELS AT EVERY LANDFILL SUMP)	0400-11-01-.04(2)(a)(3) 0400-11-01-.04(4)(a)7	?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS The temporary leachate pit on phase III no longer exist. Leachate from Phases II and III is pumped directly into the system. <b>This item is addressed in the Phase IV renovation plan.</b>						



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VIOLATION		REGULATION	OBSERVATION			
			NVO	AOC	V1	V2
<b>OVERALL PERFORMANCE STANDARD</b>						
<b>8350</b>	LEACHATE OBSERVED AT THE SITE	0400-11-01-.04(2)(a)(3) 0400-11-01-.04(4)(a)6,	?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>COMMENTS</b>	Several leachate streams were observed on the east and north faces. This is a recurring violation. During the dry fall (AUG, SEP, and OCT) no off cell leachate was observed. no that rain has started, the outbreaks re-occur. See Comments.					
<b>8360</b>	LEACHATE ENTERING RUN-OFF	0400-11-01-.04(2)(a)(3) 0400-11-01-.04(4)(a)6	?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>COMMENTS</b>	One leachate release was observed on the east face. A photograph was taken. Releases on the north face were not entering the run-off system. See comments.					
<b>8370</b>	LEACHATE ENTERING A WATER COURSE	0400-11-01-.04(2)(a)(3) 0400-11-01-.04(4)(a)6	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>8420</b>	POTENTIAL FOR EXPLOSIONS OR UNCONTROLLED FIRES	0400-11-01-.04(2)(a)2 0400-11-01-.04(5)(a)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>8490</b>	EXCESSIVE POOLING OF WATER	0400-11-01-.04 (2)(a)3 0400-11-01-.04(8)(c)4(iii)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>8520</b>	DUMPING OF WASTE INTO WATER	0400-11-01-.04 (2)(a)3	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>PERMANENT BENCHMARK</b>						
<b>8280</b>	NO PERMANENT BENCHMARK	0400-11-01-.04(2)(o)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>PERSONNEL SERVICES</b>						
<b>8120</b>	INADEQUATE EMPLOYEE FACILITIES	0400-11-01-.04(2)(e)	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>PROPER OPERATION AND MAINTENANCE</b>						
<b>8540</b>	GROUNDWATER MONITORING SYSTEM IMPROPERLY MAINTAINED	0400-11-01-.02(5)(a)4	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						

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VIOLATION		REGULATION	OBSERVATION			
			NVO	AOC	V1	V2
<b>RANDOM INSPECTION PROGRAM</b>						
<b>8290</b>	INADEQUATE RANDOM INSPECTION PROGRAM	0400-11-01-.04(2)(s) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>RECORDS OF ORIGIN AND AMOUNT OF SOLID WASTE</b>						
<b>8610</b>	NO OPERATING SCALES AND/OR FAILURE TO MAINTAIN WASTE RECORDS	TCA 68-211-862(a)(b)(1)(2) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>RUN-ON, RUN-OFF, AND EROSION CONTROL</b>						
<b>8170</b>	INADEQUATE MAINTENANCE OF RUN-ON/RUN-OFF SYSTEM(S)	0400-11-01-.04(2)(i)1-5 0400-11-01-.04(8)(c)4(i) ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COMMENTS The perimeter road on the east face is still washed out. A perimeter ditch has been cut on the east face. The current approved plans have an inadequate run-off and erosion control plan.						
<b>8180</b>	INADEQUATE EROSION CONTROL	0400-11-01-.04(2)(i)6 0400-11-01-.04(8)(c)4(ii) ?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
COMMENTS Numerous areas of excessive erosion. While mats and hay have been placed, the long flow lengths on the cover encourage erosion. Almost all of the recurring erosion is on the long flow length slopes. Excessive amounts of sediment are being discharged into the run-off system. The nature of the soil (sand) has allowed most of the sediment to settle out before it reaches the sediment pond.						
<b>SPECIAL WASTE APPROVAL PROCESS</b>						
<b>8300</b>	MISHANDLING OF SPECIAL WASTE	0400-11-01-.01(4)(d)1 ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>UNLAWFUL METHODS OF DISPOSAL</b>						
<b>8570</b>	OPERATION DOES NOT CORRESPOND WITH ENGINEERING PLANS (EVALUATE AND RECORD THE APPROXIMATE INTERIOR AND EXTERIOR SLOPE OF THE LANDFILL)	TCA 68-211-104(3) TCA 68-211-105(b) ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS See comments below						
<b>8580</b>	OPERATION DOES NOT CORRESPOND WITH PERMIT CONDITIONS	TCA 68-211-104(3) 0400-11-01-.02(5)(a)(1) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>WASTE HANDLING AND COVER STANDARDS</b>						
<b>8430</b>	WASTE NOT CONFINED TO A MANAGEABLE AREA	0400-11-01-.04(6)(a)1 ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						

\*SEE DISCLAIMER ON LAST PAGE

VIOLATION		REGULATION	OBSERVATION			
			NVO	AOC	V1	V2
<b>WASTE HANDLING AND COVER STANDARDS</b>						
<b>8440</b>	IMPROPER SPREADING OF WASTE	0400-11-01-.04(6)(a)2	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8450</b>	IMPROPER COMPACTING OF WASTE	0400-11-01-.04(6)(a)2	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8460</b>	UNSATISFACTORY INITIAL COVER	0400-11-01-.04(6)(a)3 0400-11-01-.04(6)(a)5	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8470</b>	UNSATISFACTORY INTERMEDIATE COVER	0400-11-01-.04(6)(a)4 0400-11-01-.04(6)(a)5	?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COMMENTS Numerous areas of erosion on the east and north faces. Waste was exposed on the north face of the landfill. This is a recurring violation.						
<b>8480</b>	UNSATISFACTORY FINAL COVER	0400-11-01-.04(6)(a)6 0400-11-01-.04(8)(c)4	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8510</b>	UNSATISFACTORY STABILIZATION OF COVER	0400-11-01-.04(6)(a)5,6	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>WASTE RESTRICTIONS</b>						
<b>8210</b>	UNAUTHORIZED WASTE ACCEPTED	0400-11-01-.04(2)(k)1 0400-11-01-.04(2)(k)6	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						
<b>8220</b>	UNAPPROVED SPECIAL WASTE ACCEPTED	0400-11-01-.01(4)(b) 0400-11-01-.01(4)(c)5	?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COMMENTS						

\*SEE DISCLAIMER ON LAST PAGE

VIOLATION		REGULATION	OBSERVATION			
			NVO	AOC	V1	V2
<b>WASTE RESTRICTIONS</b>						
<b>8230</b>	TIRES IMPROPERLY HANDLED	0400-11-01-.04(2)(k)3.(i) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						
<b>8240</b>	MEDICAL WASTE IMPROPERLY HANDLED	0400-11-01-.04(2)(k)4.(i-iv) ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>COMMENTS</b>						

#### LEACHATE LEVELS

The leachate meter showed 13,376,368 gallons pumped at the time of the inspection. This is 918,517 gallons since the last inspection. The open nature of Phase IV, where all rain fall is managed as leachate, has contributed to the volume of leachate. Additionally, the opening of Phases II and III to find the leachate lines seems to have also increased leachate flow from those phases.

*\*Disclaimer: The information contained in these documents (checklists/notes, etc.) is not intended to be all inclusive and is subject to change. These documents are intended solely for use by DSWM staff. These documents are not a substitute for evaluation of compliance in accordance with applicable laws and regulations. These documents are not intended for, nor can they be relied upon, to create any rights, substantive or procedural, enforceable or useable by any party in litigation with the State of Tennessee or its employees.*

**SAVE FORM**

Follow-Up Inspection Date

12/19/19

Inspector Name

**John Boatright**

Digitally signed by John Boatright  
DN: cn=John Boatright, o=Division of Solid Waste Management, ou=Tennessee  
Department of Environment and Conservation, email=john.boatright@dn.state.tn.us  
Date: 2019.11.26 09:05:43 -0600

## ADDITIONAL COMMENTS

8350 and 8360 - These are recurring violations. An examination of the record show that each summer the leachate breakouts drop off due to the lack of rain and each winter they reoccur. November 2018 to May 2019, July 2017 to May 2018, and May 2016 to May 2017 for 8350. November 2018 to April 2019, May 2019, January 2018 to March 2019, and December 2017.

8570 - The leachate pit has been removed as part of the Phase IV reconstruction.

The specific violations related to the reconstruction of Phase IV (8340, 8320, and 8570) are not included in the follow-up inspection date listed above.

EROSION CONTROL - Most temporary erosion control measures shown in the Tennessee Erosion Prevention and Sediment Control Program Level I course book do not require a permit modification to be implemented. The current approved plans have an inadequate storm water management and erosion control plan. More effort needs to be placed on reducing the erosive effects

The primary problem for this facility in establishing and maintaining intermediate cover is the poor quality of the available soils. The primary soil is a very slightly clayey sand that has no cohesion when exposed to weathering. Hardeman County should either find a different source of soil that has a higher clay content or take aggressive stabilization measures. Until a more cohesive cover soil is found the County will continue to spend employee time and resources replacing the washed away cover.

8180 - This has been a recurring violation. The seventeen insitences since September 2016. Since February 2018 this has been a constant violation either as minor or a major violation.


On September 4, 2019, a Compliance Review Meeting was held in the Jackson Filed Office. In that meeting Hardeman County agreed to completely cover the east and north faces of the landfill, to plant grass, and take other erosion control measures as appropriate by October 4, 2019, and completed the perimeter road and run-off control ditch by November 4, 2019. An extension for the cover activities was granted until November 4, 2019.


At the time of this inspection the north face of the landfill had exposed waste. Erosion control matting and straw had been place on the cover. Grass had been planted, but was not coming in everywhere. No other erosion control measures had been taken.

The perimeter ditch had been cut on the east face, but not on the north. The perimeter road was washed out on the east face and impassable due to sediment accumulation on the north face.

Given that Hardeman County did not complete the compliance agreement and the regular occurrence of the cover, erosion, and leachate violations, a formal Notice of Violation will follow this inspection report and an Enforcement Action Request will be forwarded to the Division's Central Office.

## Photographic Log

Site Name:	Tracking No.:	Date:
Hardeman County Landfill	SNL350000223	20191119
 <p>35.2829° N, 89.0556° W 2019-11-19 10:08:41</p> <p><b>Photo 1.</b> View south over the last filled area. Note that the soil type is different from the previous sandy soil. Picture has been cropped to remove excess sky.</p>		

Site Name:	Tracking No.:	Date:
Hardeman County Landfill	SNL350000223	20191119
 <p>35.2865° N, 89.0544° W 2019-11-19 10:09:03</p> <p><b>Photo 2.</b> View northeast over the east face. Note how the matting and straw are holding the soil in place. Picture has been cropped to remove excess sky.</p>		



<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20191119
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**Photo 3.** View south along the east face. Note the existence of a ditch. Also note that the erosion on the cover is near the toe of the slope. Picture has been cropped to remove excess sky.


<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20191119
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**Photo 4.** View north of the east face. The flow in this portion of the ditch appears to be from recent rains. Picture has been cropped to remove excess sky.



<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20191119
		
<b>Photo 5.</b> Erosion gully at the bottom of the east face. Note the exposed/washed waste. Also note the rill erosion on the side slope.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20191119
		
<b>Photo 6.</b> View north along the east face. Note the leachate breakout entering the run off system.		



**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20191119



**Photo 7.** View south of the northeast corner of the fill. Note that the eroded cover and exposed waste is at the bottom of the slope. This is intermediate cover. Picture has been cropped to remove excess sky.

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20191119



**Photo 8.** View of a leachate breakout on the north slope. Note that the erosion is on the lower slope of the fill.



**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20191119



**Photo 9.** View of erosion on the north face. Note the water coming from the cover. Picture has been cropped to remove excess sky.

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20191119



**Photo 10.** View of erosion on the north face. Note that the erosion is in the bottom of the covered area. Picture has been cropped to remove excess sky.



**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20191119



35.2871° N, 89.0566° W  
2019-11-19 10:47:22

**Photo 11.** View of the west face of phase II and III above phase IV. Picture has been cropped to remove excess sky.

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20191119



35.2859° N, 89.0562° W  
2019-11-19 10:47:27

**Photo 12.** View of the southern portion of the west face. Picture has been cropped to remove excess sky.