



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 HOLLYWOOD DRIVE
JACKSON, TENNESSEE 38305-4316
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283

August 26, 2013

The Honorable Willie E. Spencer
Hardeman County Mayor
P. O. Box 250
Bolivar, TN 38008

CERTIFIED MAIL #7010 1870 0001 1508 9741
RETURN RECEIPT REQUESTED

RE: NOTICE OF VIOLATION
SNL 35-0223

Dear Mayor Spencer:

On June 20, 2013, Ron Potts, Environmental Protection Specialist, Division of Solid Waste Management (DSWM) conducted an inspection at the above referenced facility and discovered that the leachate storage tank was not receiving leachate from the leachate main, which indicated that a blockage was prohibiting the leachate from passing through the leachate main into the leachate storage tank. Failure to maintain the leachate collection/transportation system is a violation of Division Rule 0400-11-01-.04(4)(a)7. which states:

7. The leachate collection and removal system must, at a minimum, meet the following requirements:
 - (i) The leachate collection and removal system must be designed, constructed, operated and maintained such that the leachate depth over the liner does not exceed one foot as calculated referencing the infiltration volume of the 25-year 24-hour storm through the intermediate cover.
 - (ii) Leachate interception surfaces and associated piping must be designed, constructed, operated, and maintained to function without clogging throughout the scheduled post-closure care period.
 - (iii) Leachate collection reservoirs must:

- (I) Be constructed (e.g., lined) such that collected leachate is contained.
- (II) Have sufficient capacity to store the volume of leachate expected to be generated in 30 days, or other adequate provisions approved by the Commissioner; and
- (III) Have a reliable and convenient means of detecting the level of collected leachate in the reservoir and of sampling such leachate.

During this same inspection, Mr. Potts also observed that the disposal area (working face) of the landfill was too large to be covered by the removable tarp cover system (alternate daily cover). This is a violation of Division Rules 0400-11-.01(6)(a)3. which states:

- 3. The compacted solid waste must be covered at the end of each operating day with an initial cover consisting of at least a six inch layer of compacted soil or an adequate standard of other material as approved by the commissioner.

On July 31, 2013, Michael David, Geologist-DSWM conducted an inspection at the facility and discovered that these violations had not been corrected. Ron Potts and I conducted a follow-up inspection on August 7, 2013. During the course of this inspection, we observed an excavation trench in which the leachate main was exposed. We also met with Mr. Gene Mills, Hardeman County Solid Waste Director. The violations had not been corrected.

On August 19, 2013, Mr. Potts spoke with the Dewayne Lax, Hardeman County Landfill Operations Manager. Mr. Lax indicated that the initial repair/replacement of the leachate main had been completed on August 14, 2013 and that leachate flow had been reestablished. A follow-up inspection will be scheduled to observe the repair.

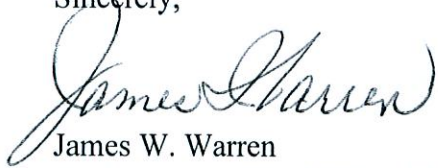
Due to the nature and extent of the non-compliance associated with the leachate collection system, DSWM hereby requests the semi-annual groundwater sampling event of 2013 be conducted within 45 days of the receipt of this letter. A representative leachate sample should also be collected and analyzed during this sampling event. In addition, DSWM requests that bromide be added to the list of sampling parameters in both the groundwater samples and the leachate sample.

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All violations relating to leachate must be corrected within seven days of the receipt of this letter and the initial cover violation must be corrected within fifteen days of the receipt of this letter.

If you have any questions concerning this correspondence, please call me at (731) 512-1337.

Sincerely,

A handwritten signature in cursive script, reading "James W. Warren".

James W. Warren
Environmental Field Office Manager
Division of Solid Waste Manager

c: Nashville Central Office
Gene Mills, Hardeman County Courthouse
Rudy Collins, External Affairs