



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
DIVISION OF SOLID WASTE MANAGEMENT
1625 Hollywood Drive
JACKSON, TENNESSEE 38305-4316

May 27, 2016

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

CERTIFIED MAIL
#7014 1820 0002 2142 4789
RETURN RECEIPT REQUESTED

RE: COMPLIANCE EVALUATION INSPECTION
NOTICE OF VIOLATION
HARDEMAN COUNTY LANDFILL
SNL 35-0223

Dear Mayor Sain:

On May 16, 2016 the Division of Solid Waste Management (DSWM) conducted a Compliance Evaluation Inspection at the referenced facility. The inspection was conducted to evaluate the facility's compliance with the *Tennessee Solid Waste Disposal Act*, Tennessee Code Annotated §68-211-101 *et seq.* and with Tennessee's Solid Waste Regulations (Division Rule Chapter 0400-11-01) promulgated pursuant to those Acts and as a follow-up to view the progress of the Phase IV construction repair work. During the inspection, violations of Tennessee's solid waste management regulations were identified. The attached Inspection Report/Notice of Violation (NOV) details the observations made by DSWM personnel during the inspection of your facility. Corrective measures for each violation should be implemented immediately. A follow-up inspection will be conducted to confirm that the violations have been corrected.

A compliance Review Meeting is scheduled for June 10, 2016 at 10:00 a.m. CDT. The meeting will be held at the Jackson Environmental Field Office located at 1625 Hollywood Drive, Jackson, TN 38305. The purpose of this meeting is to provide you with an opportunity to discuss the steps needed to bring your facility into compliance and the time table for completing the construction repairs for Phase IV. Please be advised that this matter has been referred to our Enforcement section for review.

Hardeman County Landfill
May 27, 2016
Page 2 of 2

If you have any questions or comments concerning this correspondence, please contact me by email Reese.Yontz@tn.gov or by phone 731-512-1376.

Sincerely,

A handwritten signature in blue ink that reads "James Kelly". The signature is written in a cursive style with a large initial "J".

James "Pete" Kelly
Environmental Field Office Manager

cc: Ashley Holt, Deputy Director, Field Offices
Chris Lagan, Enforcement Manager, Central Office

SOLID WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION

Hardeman County Landfill
SNL 35-0223
75 Landfill Way
Bolivar, TN 38008
731-658-2884

PRIMARY CONTACT

Kenny Brown
Hardeman County Solid Waste Director

DATE/TIME OF INSPECTION

May 16, 2016, 3:30 p.m.

INSPECTION PARTICIPANTS

Kenny Brown, Hardeman County Solid Waste Director
Steven Graves, Hardeman County Director of Operations
R. Reese Yontz, P.E., DSWM

REPORT PREPARED BY

R. Reese Yontz, P.E.
Division of Solid Waste Management
1625 Hollywood Drive
Jackson, TN
731-512-1376

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*. Furthermore, the solid waste disposal facility is currently in the midst of construction repair work on Phase IV which has not been approved for disposal of solid wastes and has several issues associated with the initial construction work.

FACILITY DESCRIPTION:

Hardeman County Landfill (SNL 35-0223), is a permitted Class I Landfill.

INSPECTION FINDINGS

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

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

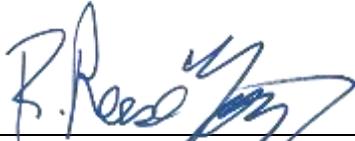
- (2) General Facility Standards – Unless specifically noted otherwise, the standards of this paragraph apply to Class I, Class II, Class III, and Class IV disposal facilities.
 - (a) Overall Performance Standard – The facility must be located, designed, constructed, operated, maintained, closed, and 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 the state and local air pollution control, water pollution control, and/or waste management control agencies

Leachate observed at site – There is an area near the pipe stack where the temporary leachate by-pass and installed leachate collection lines join together before running towards the leachate collection tank beyond the installed liners for the landfill. During the repair work the area near this stack was excavated. The installed leachate collection line appeared to have been nicked during the excavation work performed near the stack. A liquid having the appearance of leachate was observed pooled at the bottom of this excavated area.

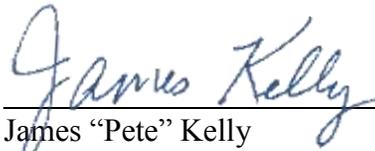
Division Rule 0400-11-01-.04(4)(a)7(ii).

- (4) Leachate Migration Control Standards
 - (a) Class I Disposal Facilities
 - 7. The leachate collection and removal system must, at a minimum, meet the following requirements:
 - (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.

Inadequate maintenance of leachate management system – There is a temporary leachate by-pass pipe near the berm between Phase III and Phase IV which has been approved by the DSWM. This by-pass should be maintained such that leachate does not overflow the berm or flow over Phase IV. At the time of inspection, the temporary by-pass was not keeping the leachate on the Phase III side of the berm and leachate was flowing on top of the Phase IV cell which has not been approved for use. There is what appears to be a secondary berm constructed by Hardeman County Landfill's construction contractor which spans both Phase III and Phase IV areas. This secondary containment area was full of leachate and was draining into one of the excavated channels over the Phase IV liner and running towards the stack area and/or being collected by the Phase IV leachate collection system.



R. Reese Yontz, P.E.
Environmental Protection Specialist



James "Pete" Kelly
Environmental Field Office Manager

Attachments:

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

Inspection Pictures



Picture 1. Stack where temporary leachate by-pass (green-blue colored pipe) joins with leachate line to run towards the leachate collection tank.



Picture 2. Closer view of the leachate collection pipe in the “stack” area. Note the nick in the pipe in the center of the picture. Liquid in the excavated area appears to be similar to other leachate observed at the landfill.



Picture 3. Primary dewatering area on the Phase III liner. This is in the area near where the original Phase IV leachate collection pipe attempted to tie-in to the Phase III leachate system. The indentation in the ground on the middle left of the picture is where this area flows into a second pit dug by Hardeman County Landfill’s construction contractor, Ronald Franks Construction.



Picture 4. View of the “secondary containment” pit which appears to be located on both the Phase III and Phase IV liners. Two 3-inch pumps which were used to dewater the work area are pictured in the foreground.



Picture 5. Leachate flowing out of the “secondary containment” area into an excavated channel on the Phase IV liner.



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF SOLID WASTE MANAGEMENT
 William R. Snodgrass Tennessee Tower
 312 Rosa L. Parks Avenue, 14th Floor
 Nashville, Tennessee 37243
SOLID WASTE DISPOSAL FACILITY EVALUATION

NAME OF SITE <i>Hardeman Co.</i>				REGISTRATION NUMBER <i>SNL 35 000 0223</i>		DATE <i>5/16/16</i>		
LOCATION (physical) <i>Landfill Way Bolivar</i>				PURPOSE <input type="checkbox"/> Complete <input type="checkbox"/> Complaint		<input type="checkbox"/> Follow-up <input type="checkbox"/> Other		
OWNER/OPERATOR <i>Hardeman Co.</i>				TYPE OF FACILITY <input checked="" type="checkbox"/> CLASS I <input type="checkbox"/> CLASS III		<input type="checkbox"/> CLASS II <input type="checkbox"/> CLASS IV		
		NVO*	V1	V2		NVO*	V1	V2
Inadequate vector control	8010	---	---	---	Buffer zone standard violated	8310	---	---
Access not limited to operating hours	8020	---	---	---	Inadequate maintenance of leachate management system	8320	---	✓
Inadequate artificial or natural barrier	8030	---	---	---	Leachate improperly managed	8330	---	---
Inadequate information signs	8040	---	---	---	Inadequate leachate collection system	8340	---	✓
Unsatisfactory access road(s)/ parking area(s)	8050	---	---	---	Leachate observed at the site	8350	---	✓
Certified personnel not present during operating hours	8060	---	---	---	Leachate entering runoff	8360	---	---
Unapproved salvaging of waste	8070	---	---	---	Leachate entering a water course	8370	---	---
Evidence of open burning	8080	---	---	---	Inadequate gas migration control system	8380	---	---
Inadequate fire protection	8090	---	---	---	Inadequate maintenance of gas migration control system	8390	---	---
Unsatisfactory litter control	8110	---	---	---	Potential for explosions or uncontrolled fires	8420	---	---
Inadequate employee facilities	8120	---	---	---	Waste not confined to a manageable area	8430	---	---
No communication devices	8130	---	---	---	Improper spreading of waste	8440	---	---
Inadequate operating equipment	8140	---	---	---	Improper compacting of waste	8450	---	---
Unavailability of backup equipment	8150	---	---	---	Unsatisfactory initial cover	8460	---	---
Unavailability of cover material	8160	---	---	---	Unsatisfactory intermediate cover	8470	---	---
Inadequate maintenance of runoff/runoff system(s)	8170	---	---	---	Unsatisfactory final cover	8480	---	---
Inadequate erosion control	8180	---	---	---	Excessive pooling of water	8490	---	---
Inadequate dust control	8190	---	---	---	Unsatisfactory stabilization of cover	8510	---	---
Unauthorized waste accepted	8210	---	---	---	Dumping of waste into water	8520	---	---
Unapproved special waste accepted	8220	---	---	---	Unsatisfactory records or reports	8530	---	---
Tires improperly handled	8230	---	---	---	Groundwater monitoring system improperly maintained	8540	---	---
Medical waste improperly handled	8240	---	---	---	Operation does not correspond with engineering plans	8570	---	---
Dead animals improperly handled	8250	---	---	---	Operation does not correspond with permit condition(s)	8580	---	---
Washout of solid waste	8270	---	---	---				
No permanent benchmark	8280	---	---	---				
Inadequate random inspection program	8290	---	---	---				
Mishandling of special waste	8300	---	---	---				
*No Violation Observed								
COMMENTS: <i>Phase IV leachate lines have been exposed at the stack before the leachate tank run. Phase IV leachate lines on my original</i>								
<i>at the Phase IV liner have been exposed in addition to the temporary line previously exposed. Breach at Phase III/IV intersection has allowed leachate to flow to the Phase IV liner system but the leachate is being contained there. Hardeman Co. & City of Bolivar are evaluating running a sewer connection directly to the leachate tank. All</i>								
PERSON INTERVIEWED (Signature) <i>[Signature]</i>				INSPECTED BY (Signature) <i>[Signature]</i>				
TITLE <i>Director</i>				TITLE <i>EPS 3</i>				
TIME OF DAY <i>3:30 PM</i>		WEATHER CONDITIONS <i>Mild Overcast & Spinkling</i>			COMPLIANCE DATE <i>ASAP</i>			

Distribution:
CN-0761 (Rev. 12/13)

Field Office - White Facility - Canary

RDA's 2202 and 2499

repair work is halted pending this evaluation.