



**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**

May 06, 2019

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

**CERTIFIED MAIL # 91 7108 2133 3932 2042 9724  
RETURN RECEIPT REQUESTED**

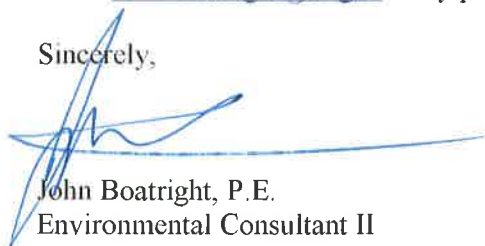
**RE: COMPLIANCE EVALUATION INSPECTION  
NOTICE OF VIOLATION  
HARDEMAN COUNTY LANDFILL  
SNL350000223**

Dear Kenny Brown:

On April 23, 2019, the Division of Solid Waste Management (Division) 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 that Act. 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 Division personnel during the inspection of your facility. Corrective measures for each violation must be implemented immediately and completed by May 27, 2019. A follow-up inspection will be conducted to confirm that the violations have been corrected.

The Division appreciates the courtesy and cooperation shown by Hardeman County Landfill during the inspection. If you have any questions or comments concerning this correspondence, please contact me by email [John.boatright@tn.gov](mailto:John.boatright@tn.gov) or by phone 901-371-3011.

Sincerely,



John Boatright, P.E.  
Environmental Consultant II

ENCL: Inspection Report

CC: JB/nb/07905062019  
Ashley Holt, Deputy Director, DSWM  
Chris Lagan, DSWM – Enforcement

## **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

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

April 23, 2019, at 11:54 a.m.

### **INSPECTION PARTICIPANTS**

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*.

### **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 property consist 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 five 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, North, and West slopes of the landfill. Other than one silt fence along the northern edge of the landfill, no temporary erosion control measures were observed at the time of the inspection. The silt fence on the north side has collapsed in one location and was overtopped by accumulated sediment along almost it's entire length (photos 15 and 16).

The majority of the cover on Phases II and III has not had grass or other material applied to control erosion. Where grass has been established, little or no erosion has occurred. The erosion on Phases II and III has exposed waste. Photos 4, 6, 17, and 19 show erosion of the initial and intermediate covers on the East, North, and West slopes of the landfill. Other photographs in the photograph attachment show details of the erosion.

It should also be noted that the facility does not appear to have discharge permit with the Division of Water Resources. An approved Storm Water Pollution Prevention Plan could not be located. The Tennessee Erosion Prevention and Sediment Control Training Program (available at <https://tnepsc.org/index.asp>) provides valuable training on preventing erosion.

#### **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:**

Leachate Observed at the Site – Leachate was observed on the West, North, and East faces of the landfill (Phases II and III). Leachate on the West face is captured by the liner of Phase IV and is addressed in a compliance agreement covering Phase IV. Photographs 9, 10, 11, 12, 13, 14, 15, and 16 document the leachate observed. This violation has been observed at the site thirty seven times in the last five years.

**Violation Observation:**

Leachate Observed Entering Run-Off – Leachate was observed entering the landfill run-off system at the time of the inspection. Photographs 10, 12, and 15 show the leachate flowing into the run-off system.

No leachate was observed entering the facility's sediment basin. In the event of a large rain event the leachate observed will be washed into the sediment basin and ultimately into surface waters.

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

- (6) Waste Handling and Cover Standards -
  - (a) Class I Disposal Facilities -
    - 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.
    - 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 Initial Cover - Several areas of phase III appear to have never had an approved initial cover applied. The facility has approval for a tarp and for "Finn Waste Cover". Thin plastic tarps/drop cloths are being used to cover some areas. This material has not been approved as an alternative initial cover. Photographs 4, 5, 6, 7, and 18 show the use of the unapproved alternate initial cover material. Large areas of Phase III have eroded down to waste.

**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 – Areas of Phase II and III where intermediate cover has been applied in the past are heavily eroded. Waste has been exposed and numerous leachate seeps are present. Photos 17 and 19 show the North and East faces. The photographs clearly show that where vegetation has been established, little or no erosion has occurred.

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

(6) Waste Handling and Cover Standards -

(a) Class I Disposal Facilities -

5. All initial and intermediate cover depths must be maintained until either additional wastes are placed over the area or final cover is applied.

And

6. Upon achieving final grade or as otherwise required by the Commissioner, final cover shall be placed as set forth in the closure standards of paragraph (8) of this rule.

**Division Rule 0400-11-01-.04(8)(c)6.**

(8) Closure and Post Closure Standards –

(c) Closure Requirements –

6. In addition to the drainage and grading requirements and vegetative cover requirements, the operator shall take other measures as may be necessary to minimize and control erosion and sedimentation (e.g., soil stabilization, sediment ponds) at the site.

Facility Specific Permit Conditions – The following conditions of this permit are established pursuant to Rule 0400-11-01-.02(5)(b):

4. During the entirety of the post-closure period for Phase I of the facility, adequate erosion control on the crown and side slopes of the filled area must be maintained. In the event that side-slope erosion becomes a chronic problem, the facility may be required to install additional interceptor berms on the side slopes, as well as run-off let-down structures, armored ditches, and energy-dissipation devices.

**Violation Observation:**

Unsatisfactory Stabilization of Cover – Areas of Phase I have erosion. On the West face a road up the side of the landfill has eroded down to the synthetic cap. Sediment from the Phase II has partially filled the erosion gullies (photo 7). On the East face several erosion gullies have formed on the steeper bottom slope (photo 8). There are currently no erosion control devices or structures installed on the final cover of Phase I. Areas with steep slopes or long sheet flow lengths in excess of 90 feet should be equipped with appropriate erosion controls.



John Boatright, P.E.



Herb Nicholson, P.G., CHMM  
Environmental Field Office Manager

**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	TIME	WEATHER
Bolivar-Hardeman County Landfill		20190423	11:54	60'S PC
SNL350000223 75 Landfill Way		INSPECTOR	EFO	
		JWB	MEMPHIS	
*SEE DISCLAIMER ON LAST PAGE				
VIOLATION		REGULATION		OBSERVATION
				NVO AOC V1 V2
<b>BUFFER ZONE STANDARDS FOR SITING LANDFILLS</b>				
<b>8310</b>	BUFFER ZONE STANDARD VIOLATED	0400-11-01-.04(3)(a)		<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
<b>COLLECTED LEACHATE</b>				
<b>8330</b>	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				
<b>8340</b>	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.			
<b>COMMUNICATIONS</b>				
<b>8130</b>	NO COMMUNICATION DEVICES	0400-11-01-.04(2)(f)		? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
<b>COVER MATERIAL</b>				
<b>8160</b>	UNAVAILABILITY OF COVER MATERIAL.	0400-11-01-.04(2)(h)		? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
<b>DEAD ANIMALS</b>				
<b>8250</b>	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				
<b>DUST CONTROL</b>				
<b>8190</b>	INADEQUATE DUST CONTROL	0400-11-01-.04(2)(j)		? <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS				
<b>DUTY TO PROVIDE INFORMATION</b>				

*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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <input type="checkbox"/>
COMMENTS				
<b>OVERALL PERFORMANCE STANDARD</b>				
<b>8270</b>	WASHOUT OF SOLID WASTE	0400-11-01-.04(2)(a)(3)	?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
COMMENTS Phases II and III have extensive erosion exposing waste and waste has been transported down the sides 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 type="checkbox"/> <input checked="" type="checkbox"/>
COMMENTS Leachate flow meter showed 10,335,771 gallons pumped at the time of the inspection. The window on the meter is crazed and it is difficult to read the meter. The lower leachate pipe was disconnected from the standpipe at the time of the inspection. The temporary leachate pit on Phase III had no free board and was extensively silted up.				

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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 type="checkbox"/> <input checked="" type="checkbox"/>
<b>COMMENTS</b>	Numerous leachate breakouts observed on phases II and III. The amount of leachate observed has lessened since the last time this inspector visited the site in February.			
<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 type="checkbox"/> <input checked="" type="checkbox"/>
<b>COMMENTS</b>	Leachate staining and flow paths show leachate entering the perimeter run-off system in numerous areas. Leachate was observed entering the run-off system at the time of the inspection.			
<b>8370</b>	LEACHATE ENTERING A WATER COURSE	0400-11-01-.04(2)(a)(3) 0400-11-01-.04(4)(a)6	?	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<b>COMMENTS</b>	While no discoloration or other overt indicator in the unnamed tributary to Short Creek shows leachate entering this water course, the run-off system discharges into that stream and leachate has been observed in the run-off system.			
<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"/> <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"/> <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"/> <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"/> <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"/> <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"/> <input type="checkbox"/>
<b>COMMENTS</b>				

*SEE DISCLAIMER ON LAST PAGE				
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 checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS	The previous issues noted remain. The perimeter run-off system that routes storm water to the sediment basin appears to work. There appears to be no run-off system other than the perimeter system.			
<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 type="checkbox"/> <input checked="" type="checkbox"/>
COMMENTS	No temporary erosion control measures were observed at the time of this inspection. Extensive sediment deposits were observed at the bottoms of the side slopes of phases II and III.			
<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 checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS	This facility has been given temporary permission by DSWM to utilize a leachate pit near the interface between Phase III and IV to collect leachate from Phase I to III. A minimum of 2 feet of free board will be maintained. A minor modification is proposed to reconstruct phase IV to fix this problem.			
<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 type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
COMMENTS	The current working face appears to exceed the area covered by the ADC tarp.			

*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"/> <input type="checkbox"/>
<b>COMMENTS</b>				
<b>8450</b>	IMPROPER COMPACTING OF WASTE	0400-11-01-.04(6)(a)2	?	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<b>COMMENTS</b>				
<b>8460</b>	UNSATISFACTORY INITIAL COVER	0400-11-01-.04(6)(a)3 0400-11-01-.04(6)(a)5	?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
<b>COMMENTS</b> Several areas of phase III appear to have never had an approved daily cover applied. The facility has approval for a tarp and for "Finn Waste Cover". Thin plastic tarps/drop cloths are being used to cover some areas. This material has not been approved as an alternative daily cover.				
<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 type="checkbox"/> <input checked="" type="checkbox"/>
<b>COMMENTS</b> While intermediate cover may have been applied at some time in the past, the current cover has extensive erosion. Waste is exposed in many areas.				
<b>8480</b>	UNSATISFACTORY FINAL COVER	0400-11-01-.04(6)(a)6 0400-11-01-.04(8)(c)4	?	<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
<b>COMMENTS</b> The soil cover in the north west corner of Phase I has eroded away where a road ran up the side of the landfill. Weather conditions have prevented repairs. On the East side of Phase I erosion gullies have begun to develop on the bottom slope.				
<b>8510</b>	UNSATISFACTORY STABILIZATION OF COVER	0400-11-01-.04(6)(a)5,6	?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
<b>COMMENTS</b> Areas where grass has been established appear to be stable. The rest of the cover on Phase II and III has extensive erosion scars. The use of straw, mulch, or other material to stabilize the cover until grass can be established would mitigate the erosion.				
<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"/> <input type="checkbox"/>
<b>COMMENTS</b>				
<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"/> <input type="checkbox"/>
<b>COMMENTS</b> The facility has two approved active special waste and one one time only special waste approvals. No special waste were observed entering the facility during the inspection.				

*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

*\*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.*

5/27/19

Compliance Date

**LOCK Form**

**SAVE FORM**


#### ADDITIONAL COMMENTS


Given the nature and severity of the violations listed, a written Notice of Violation will follow this inspection report. If you anticipate not being able to correct the violations listed by follow-up inspection date, please request an extension prior to the follow-up inspection date. If you anticipate that the time required to correct the violations will extend beyond 10 June 2019, a written compliance plan should be submitted before that date.


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.


### Photographic Log


<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
 <p>2019/04/23 11:54 +35.289953,-89.064060</p>		
<b>Photo 1.</b> View East of the landfill from Highway 64. Picture cropped to remove excess sky.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
 <p>2019/04/23 12:10 +35.286584,-89.054448</p>		
<b>Photo 2.</b> View over the working face.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<b>Photo 3.</b> The leachate line riser below Phase IV. Note that the line from Phases I to III is disconnected.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<b>Photo 4.</b> View from Phase IV of the West face of Phase II/III. Note the uncovered waste and the unapproved tarp. This picture has been cropped to remove excess sky.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
 <p data-bbox="998 829 1328 898">2019/04/23 12:45 +35.286834,-89.055612</p>		
<b>Photo 5.</b> Sediment fan in the temporary leachate pit.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
 <p data-bbox="998 1732 1328 1795">2019/04/23 12:50 +35.285706,-89.055873</p>		
<b>Photo 6.</b> View from the Southwest of the active area of the landfill. Note the uncovered waste and the unapproved tarps.		

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20190423



**Photo 7.** Erosion on Final cover of Phase I in Northwest corner of phase. Note that erosion from Phase II appears to have partially filled the erosion on Phase I.

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20190423



**Photo 8.** View of the East side of Phase I. Note the starter erosion rills on the final cover.

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20190423



**Photo 9.** Leachate on the East face.


**Site Name:**  
Hardeman County Landfill


**Tracking No.:**  
SNL350000223

**Date:**  
20190423



**Photo 10.** Leachate from Photo 09 entering the run-off system.

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<b>Photo 11.</b> A group of leachate breakouts on the East face of Phase III.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<b>Photo 12.</b> Leachate from Photo 11 entering the run-off.		

**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223

**Date:**  
20190423



**Photo 13.** View south along the East face. Photo 11 leachate is in the foreground and photo 09 leachate is in the middle ground.


**Site Name:**  
Hardeman County Landfill

**Tracking No.:**  
SNL350000223


**Date:**  
20190423




**Photo 14.** Leachate on the North face of Phase III. Note the exposed waste.

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<b>Photo 15.</b> Leachate from Photo 14 enter the run-off.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<b>Photo 16.</b> View West along the Northern toe of Phase III.		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<p><b>Photo 17.</b> View of the North face of Phase III. Note the erosion down to waste and the waste washed out. This view is a panorama of three different pictures.</p>		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
		
<p><b>Photo 18.</b> Center of the North face. The current working area is at the top of the picture. Note the washed out waste.</p>		

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
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**Photo 19.** Panorama of the East face. Phase I is the covered area to the left. Note that areas where grass has been established are stable and areas where it is not have alluvial fans below them.

<b>Site Name:</b> Hardeman County Landfill	<b>Tracking No.:</b> SNL350000223	<b>Date:</b> 20190423
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**Photo 20.** The damaged screen on the leachate flow meter.