



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

NOTICE OF NON-COMPLIANCE

CERTIFIED MAIL
Return Receipt Requested
7011 3500 0003 5161 0997

February 7, 2013

Mr. John Anderson, Operator Yarnell Road Landfill
Waste Corporation of America
P. O. Box 31165
Knoxville, Tennessee 37920

Dear Mr. Anderson:

We are writing to confirm the observations and recommendations, which were made on February 5, 2013. The violations of the regulations established under the Tennessee Solid Waste Disposal Act and the steps to be taken in order to bring those violations into compliance are detailed in the attached copy of the Solid Waste Facility Inspection Report for your facility.

We are requesting that the violations noted in the inspection report be brought into compliance. Please be advised that the Tennessee Solid Waste Disposal Act (Tennessee Code Annotated, Section 68-211-101) provide that violators may be subject to civil and/or criminal penalties.

If you have any question concerning this correspondence you may reach me at (865) 594-5474.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paula Plont", is written over a horizontal line.

Paula Plont
Environmental Protection Specialist
Division of Solid Waste Management
Knoxville Field Office

A handwritten signature in cursive script, appearing to read "R. Awasthi", is written over a horizontal line.

Revendra Awasthi
Environmental Field Office Manager
Division of Solid Waste Management
Knoxville Field Office

cc: Nashville Central Office

SOLID WASTE FACILITY INSPECTION

NAME OF FACILITY

Yarnell Road Landfill

I.D.NUMBER

DML 47-0069

ADDRESS AND LOCATION

1550 Lamons Quarry Road, Knoxville, Tennessee

OWNER / OPERATOR / PRINCIPAL CONTACT

Owner: Waste Corporation of America.

Manager & Primary Contact: John Anderson

MAILING ADDRESS

P.O. Box 31165 Knoxville, TN 37920

TELEPHONE

865-470-2673

DATE / TIME OF INSPECTION

February 5, 2013, 1:30 a.m. – 3:30 p.m.

REPORT PREPARED BY

Paula Plont

Division of Solid Waste Management

Department of Environment and Conservation

3711 Middlebrook Pike

Knoxville, Tennessee 37921

Phone: (865) 594-5474

NAME(S) OF PARTICIPANTS / TITLES / AFFILIATIONS

Paula Plont, Environmental Protection Specialist, Division of Solid Waste Management and John Anderson, Yarnell Road Landfill operator

PURPOSE OF VIOLATION

The purpose of this visit to the Class III Landfill was in response to a complaint from resident on Snyder Rd in addition to conduct a regular inspection for the first quarter of calendar year 2013. This inspection was to determine if the facility was operating in compliance with the Rules Governing Solid Waste Processing and Disposal Facilities in Tennessee (Rule Chapter 0400-11-1).

FACILITY DESCRIPTION

The Class III Landfill is located on the east side of Yarnell Road in west Knox County. The landfill is currently placing waste in a section of Phase F-2 on the highest back portion of the site. The demolition landfill permit allows for 25 acres of waste fill within 58 site acres owned by Waste Corporation of America. The last permit for this landfill was issued in January 2006, when 4 additional acres, identified as Phase F-4, was added to the plans.

Violation

The following violations of the Tennessee Solid Waste Disposal Act and Rule Chapter 0400-11-1, Solid Waste Processing and Disposal, were verified:

1. TCA 68-211-104(3) states that it is unlawful to operate a solid waste disposal facility in violation of rules established under the authority of the Solid Waste Disposal Act.

2. Rule 0400-1-7-.04(2)(a)3. 8350(V2) – Leachate observed at the site 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 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.

One small leachate outbreak or pop was identified on Phase F-3 in close proximity to the south ditch into the large bottom storm water pond. Small rills were observed upslope from the wet area. Some pooled liquids were in the ditch to the pond.

The second area observed was a large sump purposefully dug for containment that held a large quantity of liquids at the toe of waste in Phase F-2.

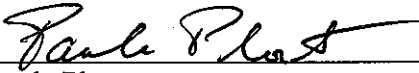
3. Rule 0400-1-7-.04(4)(a)7.(i) 8340(V2) – Inadequate leachate collection system The leachate collection and removal system must be designed, constructed, operated, and maintained such that the leachate depth over the liner does exceed one foot.

The leachate system did not flow liquids collected from wastes in Phase F-2 to the tanks. The head on the lines caused saturation above the system and an open exterior sump was necessary to prevent loss of liquid to the storm water run-off ditch system including pond. One surficial PVC pipe although connected was observed to be dripping. Surface PVC piping and pipe connections must be replaced by permanent piping with superior strength.

RECOMMENDATIONS / REMARKS

The liquids contained in the sump must be expeditiously pumped and hauled off-site to a permitted treatment facility and clean dry dirt packed in to the area to seal re-occurrence. Hauling manifest and pumping records must be maintained and provided to show disposal details. Cover on top of the waste should be increased to decrease rain water infiltration and hence leachate generation. Phase F-3 area needs increased cover and smoothing of rills above wet area including the concrete disposal area in close proximity. Sample the pond and creek for potential impacts until the site returns

to compliance and two rounds of laboratory data proves no residual impacts. An aerator was requested to be placed in this lower pond as soon as possible to mitigate water quality if leachate had impacted those waters. Submit sample results once available from the analytical laboratory. The backpressure of competing pressures of liquids in Phase F-1 and Phase F-2 are a design and operational inadequacy. Surface PVC piping and pipe connections must be replaced by permanent piping with superior strength. Tanks and pumps and collection lines must be capable of collecting, holding and transporting off-site in expeditious manner such leachate liquids for permitted waste water treatment and disposal. The Division directs the submittal of a permit modification and for construction for such to commence by March 1, 2013. The Division will not support any additional footprint construction (and can exercise enforcement actions) if the leachate lines and storage tank capabilities are not improved to prevent the repeat of such violations as top current priority.



Paula Plont

February 7, 2013

ATTACHMENTS/EXHIBITS

February 5, 2013, Solid Waste Disposal Facility Evaluation

Cc: Nashville-DSWM