

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

July 29, 2020

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

CERTIFIED MAIL # 91 7108 2133 3932 2042 7300 RETURN RECEIPT REQUESTED

RE:

COMPLIANCE EVALUATION INSPECTION NOTICE OF VIOLATION HARDEMAN COUNTY LANDFILL

SNL350000223

Dear Mayor Sain:

On July 16, 2020, the Division of Solid Waste Management (DSWM) conducted a follow up compliance evaluation inspection at your 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 August 16, 2020. A follow-up inspection will be conducted to confirm that the violations have been corrected.

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

Sinderely,

ohn Boatright, P.E.

Environmental Consultant II

ENCL: Inspection Report

JB/nb/079292020

CC: Rob Ashe, DSWM, Deputy Director of Field Office Operations

Chris Lagan, DSWM – Enforcement Clifton Jeter, EFOM, DSWM, JFO

Herb Nicholson, P.G., CHMM, EFOM, DSWM, MFO

SOLID WASTE INSPECTION REPORT

SITE/PHYSICAL LOCATION

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

PRIMARY CONTACT

Jimmy Sain Mayor Hardeman County 100 N. Main Street Bolivar, TN 38008

DATE/TIME OF INSPECTION

July 16, 2020, at 09:57 a.m.

INSPECTION PARTICIPANTS

Nathan Jordan, Site Operator Kyle Norwood, Certified 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* and to evaluate the status of violations noted in previous inspections.

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.

No waste has been placed in the landfill in several months due to limited air space.

INSPECTION FINDINGS

During the course of the inspection the following violation was identified.

Division Rule 0400-11-01-.04(2)(b)1.

- (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.
 - (b) Control of Access and Use
 - 1. The facility must have an artificial or natural barrier which completely surrounds the active portion of the facility and must have a means to control entry, at all times, through the gate or other entrances to the active portion of the facility.

Violation Observation:

Inadequate Artificial or Natural Barrier – There are large gaps in the three-wire fence just north of the scale house. These gaps are big enough for vehicles to pass through.

SIGNED:

DATE: 2820 8729

John Boatright, P.E.

Environmental Consultant II

Tennessee Department of Environment and Conservation

Division of Solid Waste Management

Memphis Environmental Field Office

Hardeman County Landfill July 29, 2020 Page 3

REVIEWED:

DATE: 7/25/2020

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*

CLAS	SI
FACIL	ITY

					_	
SITE			DATE 7/16/2020	TIME 09:57	WEATH 80's	
Bolivar-Harde	man County Landfill SNL350000223 75 Landfill Way Hardeman					EFO MEMP
	*SEE DISCLAIME	R ON LAST F	AGE			35 5 5 30
	VIOLATION		REGULATION	l		OBSERVATION AOC V1 V2
	BUFFER ZONE STANDARD					
8310	BUFFER ZONE STANDARD VIOLATED	0400-11-01	04(3)(a)		X	
COMMENTS						
	COLLECTED	LEACHAT	E			
8330	LEACHATE IMPROPERLY MANAGED	0400-11-01	04(4)(a)8(i-iii)		? 🔀	
COMMENTS	54					
8340	INADEQUATE LEACHATE COLLECTION SYSTEM	0400-11-01	04(4)(a)7		? _	
COMMENTS	See 8570					
	COMMUN	ICATIONS				
8130	NO COMMUNICATION DEVICES	0400-11-01	04(2)(f)		? 🗵	
COMMENTS					- 10	
	COVER M	ATERIAL				gen er et e
8160	UNAVAILABILITY OF COVER MATERIAL.	0400-11-01	04(2)(h)		? 🗵	
COMMENTS						
0.7	DEAD AI	VIMALS				
8250	DEAD ANIMALS IMPROPERLY HANDLED	0400-11-01	04(2)(k)5.(ii) (I-III)		? 🗵	
COMMENTS					-	
d'Est	DUST CO	NTROL			la lyn	
8190	INADEQUATE DUST CONTROL	0400-11-01	04(2)(j)		? 🗵	
COMMENTS						
	DUTY TO PROVID	E INFORM	ATION			

	*SEE DISCLAIME	R ON LAST PAGE	
	VIOLATION	REGULATION	OBSERVATION NVO AOC V1 V2
	DUTY TO PROVID		
8530	UNSATISFACTORY RECORDS OR REPORTS	0400-11-0102(5)(a)7 ? TCA 68-211-862(a)	
COMMENTS		10.00 211 002(0)	
8590	PERMITS, PLANS, OPERATING MANUAL NOT AVAILABLE	0400-11-0102(5)(a)(7)	
COMMENTS		<u>. </u>	
A	FIRE S	AFETY	
8080	EVIDENCE OF OPEN BURNING	0400-11-0104(2)(c)1	\boxtimes
COMMENTS	*		
8090	INADEQUATE FIRE PROTECTION	0400-11-0104(2)(c)2	
COMMENTS			
	GAS MIGRATION CO	NTROL STANDARDS	A Land Control
8380	INADEQUATE GAS MIGRATION CONTROL SYSTEM	0400-11-0104(5)(a) ?	
COMMENTS			9
8390	INADEQUATE MAINTENANCE OF GAS MIGRATION CONTROL SYSTEM	0400-11-0104(5)(a) ?	
COMMENTS			
	GENERAL FACIL	ITY STANDARDS	
8010	INADEQUATE VECTOR CONTROL	0400-11-0104(2)(a)1	
COMMENTS			
8020	ACCESS NOT LIMITED TO OPERATING HOURS	0400-11-0104(2)(a)4	
COMMENTS	SEE 8030		
8030	INADEQUATE ARTIFICIAL OR NATURAL BARRIER	0400-11-0104(2)(b)1	
COMMENTS	The fence between the scale and the house to the north is down	·vn.	

	*SEE DISCLAIME	R ON LAST PAGE	
	VIOLATION	REGULATION	OBSERVATION NVO AOC V1 V2
		ITY STANDARDS	
8040	INADEQUATE INFORMATION SIGNS	0400-11-0104(2)(b)2	
8040		TCA 68-211-703(h)	
COMMENTS			
8050	UNSATISFACTORY ACCESS ROAD(S)/PARKING AREA(S)	0400-11-0104(2)(b)3	? 🖂 🗆 🗆
COMMENTS			S A
8060	CERTIFIED PERSONNEL NOT PRESENT DURING OPERATING HOURS	0400-11-0104(2)(b)5	? 🗵 🗆 🗆
COMMENTS			r
8070	UNAPPROVED SALVAGING OF WASTE	0400-11-0104(2)(b)6	
COMMENTS			
	LITTER C	ONTROL	
8110	UNSATISFACTORY LITTER CONTROL	0400-11-0104(2)(d)	? 🗵 🗆 🗆
COMMENTS			
	OPERATING	EQUIPMENT	
8140	INADEQUATE OPERATING EQUIPMENT	0400-11-0104(2)(g)	? 🗵 🗆 🗆
COMMENTS			
8150	UNAVAILABILITY OF BACKUP EQUIPMENT	0400-11-0104(2)(g)	? 🗵 🗆 🗆
COMMENTS			
	OVERALL PERFORM	MANCE STANDARD	
8270	EXPOSED SOLID WASTE	0400-11-0104(2)(a)(3)	
COMMENTS	Waste in the interface between phases II and III and IV are exp areas of exposed waste have occurred on the north and east f	posed. This item is addressed in the Phase IV faces of the landfill due to erosion of the cover.	/ renovation plan. Additional This is a recuring violation.
8320	INADEQUATE MAINTENANCE OF LEACHATE MANAGEMENT SYSTEM (INSPECTOR TO CHECK AND RECORD LEACHATE LEVELS AT EVERY LANDFILL SUMP)	0400-11-0104(2)(a)(3) 0400-11-0104(4)(a)7	? 🗆 🗆 🖂
COMMENTS	The temporary leachate pit on phase III no longer exist. Leach liner sump. This item is addressed in the Phase IV renovation.	nate pools in Phases II and III and flows over the cion plan. See Leachate Comments	e the Phase IV liner to an off

	*SEE DISCLAIM	ER ON LAST PAGE		
	VIOLATION	REGULATION		OBSERVATION NVO AOC V1 V2
		MANCE STANDARD		
8350	LEACHATE OBSERVED AT THE SITE	0400-11-0104(2)(a)(3)	?	
9330		0400-11-0104(4)(a)6,		
COMMENTS	No leachate was observed during this inspection. See comm	nents.		
0260	LEACHATE ENTERING RUN-OFF	0400-11-0104(2)(a)(3)	?	
8360		0400-11-0104(4)(a)6		
COMMENTS	See comments.	•	•	
0070	LEACHATE ENTERING A WATER COURSE	0400-11-0104(2)(a)(3)	?	
8370		0400-11-0104(4)(a)6		
COMMENTS				
0420	POTENTIAL FOR EXPLOSIONS OR UNCONTROLLED FIRES	0400-11-0104(2)(a)2	?	
8420		0400-11-0104(5)(a)		
COMMENTS		•		
0.400	EXCESSIVE POOLING OF WATER	0400-11-0104 (2)(a)3	?	
8490		0400-11-0104(8)(c)4(iii)		
COMMENTS				
8520	DUMPING OF WASTE INTO WATER	0400-11-0104 (2)(a)3	?	
COMMENTS				
		TBENCHMARK		
8280	NO PERMANENT BENCHMARK	0400-11-0104(2)(o)	?	
COMMENTS				
	PERSONN	IEL SERVICES		
8120	INADEQUATE EMPLOYEE FACILITIES	0400-11-0104(2)(e)	?	
COMMENTS	7.0			
	PROPER OPERATIO	N AND MAINTENANCE		
8540	GROUNDWATER MONITORING SYSTEM IMPROPERLY MAINTAINED	0400-11-0102(5)(a)4	?	
COMMENTS				

	*SEE DISCLAIME	R ON LAST PAGE	
	VIOLATION	REGULATION	OBSERVATION NVO AOC V1 V2
	RANDOM INSPEC	CTION PROGRAM	
8290	INADEQUATE RANDOM INSPECTION PROGRAM	0400-11-0104(2)(s) ?	
COMMENTS			
U.	RECORDS OF ORIGIN AND	AMOUNT OF SOLID WASTE	
8610	NO OPERATING SCALES AND/OR FAILURE TO MAINTAIN WASTE RECORDS	TCA 68-211-862(a)(b)(1)(2)	
COMMENTS			
	RUN-ON, RUN-OFF, AN	ND EROSION CONTROL	
8170	INADEQUATE MAINTENANCE OF RUN-ON/RUN-OFF SYSTEM(S	•	
		0400-11-0104(8)(c)4(i)	
COMMENTS	The run-off ditch around the east and north sides has started ditch along the east face has begun to silt up. The current app	to erode and no protections were in place a the time proved plans have an inadequate run-off and erosion	e of the inspection. The n control plan
0400	INADEQUATE EROSION CONTROL	0400-11-0104(2)(i)6	
8180		0400-11-0104(8)(c)4(ii)	
COMMENTS	Numerous areas of excessive erosion. While mats and hay ha Almost all of the recurring erosion is on the long flow length sl system. The nature of the soil (sand) has allowed most of the	ve been placed, the long flow lengths on the cover e opes. Excessive amounts of sediment are being dis sediment to settle out before it reaches the sedimer	ncourage erosion. charged into the run-off nt pond.
	SPECIAL WASTE AF	PPROVAL PROCESS	
8300	MISHANDLING OF SPECIAL WASTE	0400-11-0101(4)(d)1	
COMMENTS			
	UNLAWFUL METH	ODS OF DISPOSAL	
	OPERATION DOES NOT CORRESPOND WITH ENGINEERING	TCA 68-211-104(3) ?	
8570	PLANS (EVALUATE AND RECORD THE APPROXIMATE INTERIOR AND EXTERIOR SLOPE OF THE LANDFILL)	TCA 68-211-105(b)	
COMMENTS	See comments.		
	OPERATION DOES NOT CORRESPOND WITH PERMIT	TCA 68-211-104(3)	
8580	CONDITIONS	0400-11-0102(5)(a)(1)	
COMMENTS			
	WASTE HANDLING AN	D COVER STANDARDS	
8430	WASTE NOT CONFINED TO A MANAGEABLE AREA	0400-11-0104(6)(a)1	
COMMENTS			

	"SEE DISCL	AIMER ON LAST PAGE	
	VIOLATION	REGULATION	OBSERVATION NVO AOC V1 V2
W	WASTE HANDLING	G AND COVER STANDARDS	
8440	IMPROPER SPREADING OF WASTE	0400-11-0104(6)(a)2	? 🗵 🗆 🗆
COMMENTS			
8450	IMPROPER COMPACTING OF WASTE	0400-11-0104(6)(a)2	? 🖂 🗆 🗆
COMMENTS			
	UNSATISFACTORY INITIAL COVER	0400-11-0104(6)(a)3	
8460		0400-11-0104(6)(a)5	
COMMENTS		<u> </u>	
	UNSATISFACTORY INTERMEDIATE COVER	0400-11-0104(6)(a)4	?
8470		0400-11-0104(6)(a)5	
COMMENTS	Numerous areas of erosion on the east and north faces. of the landfill. This is a recurring violation.	Waste was exposed on the top of the landfil	l, the east face, and on the north face
0.400	UNSATISFACTORY FINAL COVER	0400-11-0104(6)(a)6	? 🖂 🗆 🗆 🗆
8480		0400-11-0104(8)(c)4	
COMMENTS			
8510	UNSATISFACTORY STABILIZATION OF COVER	0400-11-0104(6)(a)5,6	? 🗆 🗆 🗆
COMMENTS			
	WASTE	RESTRICTIONS	
8210	UNAUTHORIZED WASTE ACCEPTED	0400-11-0104(2)(k)1	? 🖂 🗆 🗆
0210		0400-11-0104(2)(k)6	
COMMENTS			" -
0000	UNAPPROVED SPECIAL WASTE ACCEPTED	0400-11-0101(4)(b)	
8220		0400-11-0101(4)(c)5	
COMMENTS		.	

	VIOLATION	REGULATION	OBSERVATION NVO AOC V1 V2	
WASTE RESTRICTIONS				
8230	TIRES IMPROPERLY HANDLED	0400-11-0104(2)(k)3.(i)	? 🛛 🗆 🗆	
COMMENTS				
8240	MEDICAL WASTE IMPROPERLY HANDLED	0400-11-0104(2)(k)4.(i-iv)	? 🗵 🗆 🗆	
COMMENTS				
EACHATE LE\	VELS e meter was still inoperative at the time of the in	nspection. Personnel stated in April that a ne	ew one was on order.	

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.

-	V	-	
- A	W.		RM

- 11 - 1			_
Follow-U	n Inst	pection	Date

8/16/20

Inspector Name

John Boatright

ADDITIONAL COMMENTS

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

8180 - This has been a recurring violation. The 22TH insistence since September 2016. Since February 2018 this has been a constant violation either as minor or a major violation.

8350/60 - No leachate was observed on site during this inspection. This is typical during the dryer months of July and August..

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 of moving water.

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.

Given the high erodability of the on site soils, the new run-off ditch around the east and north sides needs to be armored to prevent erosion of the ditch.

A corrective action plan has been approved by the Division.

The follow-up inspection date is for 8030 - Inadequate artificial or natural barrier. All other violations are covered by the Phase IV agreement or the July 2020 CAP.

Photographic Log

Site Name: Tracking No.: Date:
Bolivar-Hardeman County Landfill SNL350000233 20200716



Photo 1. View northeast over the rea with new cover. Note the erosion rills in the bare soil.

Site Name:	Tracking No.:	Date:
Bolivar-Hardeman County Landfill	SNL350000233	20200716



Photo 2. View down the east face at the end of the new cover.

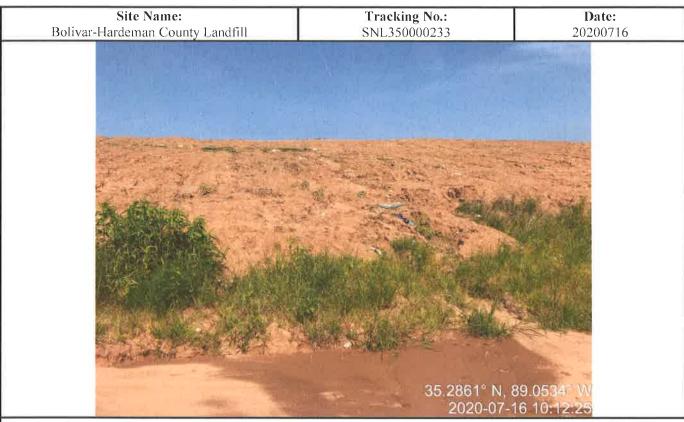


Photo 3. View up the east face. Note the heavy erosion and exposed waste at the toe of the slope. The damp area appears to be run-off water.

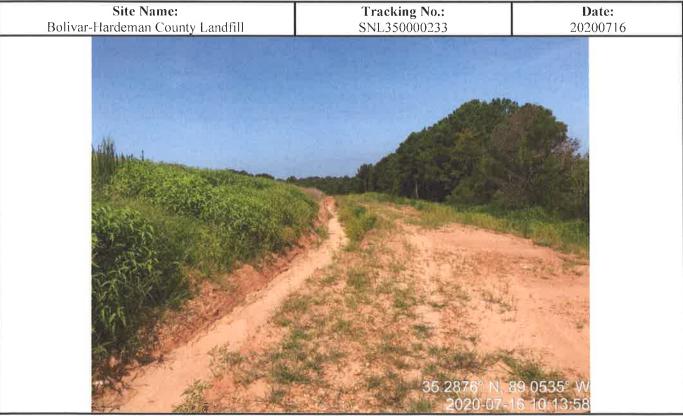


Photo 4. View west along the north toe.

Site Name:Tracking No.:Date:Bolivar-Hardeman County LandfillSNL35000023320200716



Photo 5. Erosion in the run-off ditch at the northwest corner of phase III.

Site Name:Tracking No.:Date:Bolivar-Hardeman County LandfillSNL35000023320200716



Photo 6. View of the west face of phases II and III.

Site Name: Tracking No.: Date:
Bolivar-Hardeman County Landfill SNL350000233 20200716



Photo 7. Liquids flowing from under the phase IV liner into the temporary sump.

Site Name:	Tracking No.:	Date:
Bolivar-Hardeman County Landfill	SNL350000233	20200716



Photo 8. Unprepared erosion on the west side of phase I.

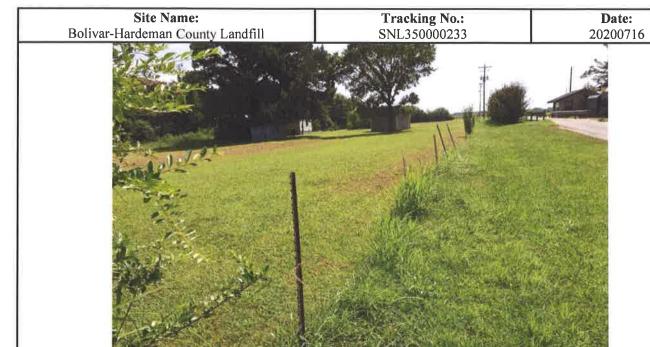
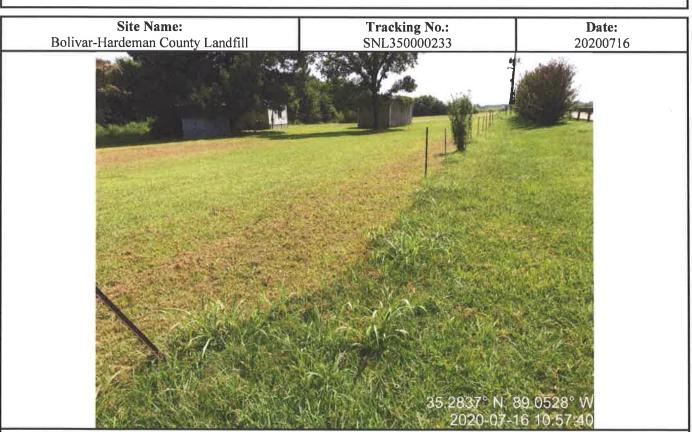


Photo 9. The open fence along the entry road near the scale house.



35.2837° N, 89.0530

Photo 10. Another gap in the fence north of the scale house.