



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, flowing style.

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.

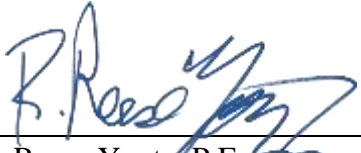
- (2) General Facility Standards – Unless specifically noted otherwise, the standards of this paragraph apply to Class I, Class II, Class III, and Class IV disposal facilities.
 - (a) Overall Performance Standard – The facility must be located, designed, constructed, operated, maintained, closed, and 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.

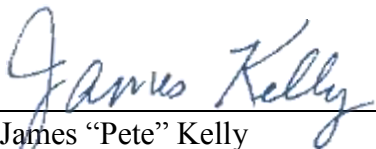
Division Rule 0400-11-01-.04(4)(a)7(ii).

- (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

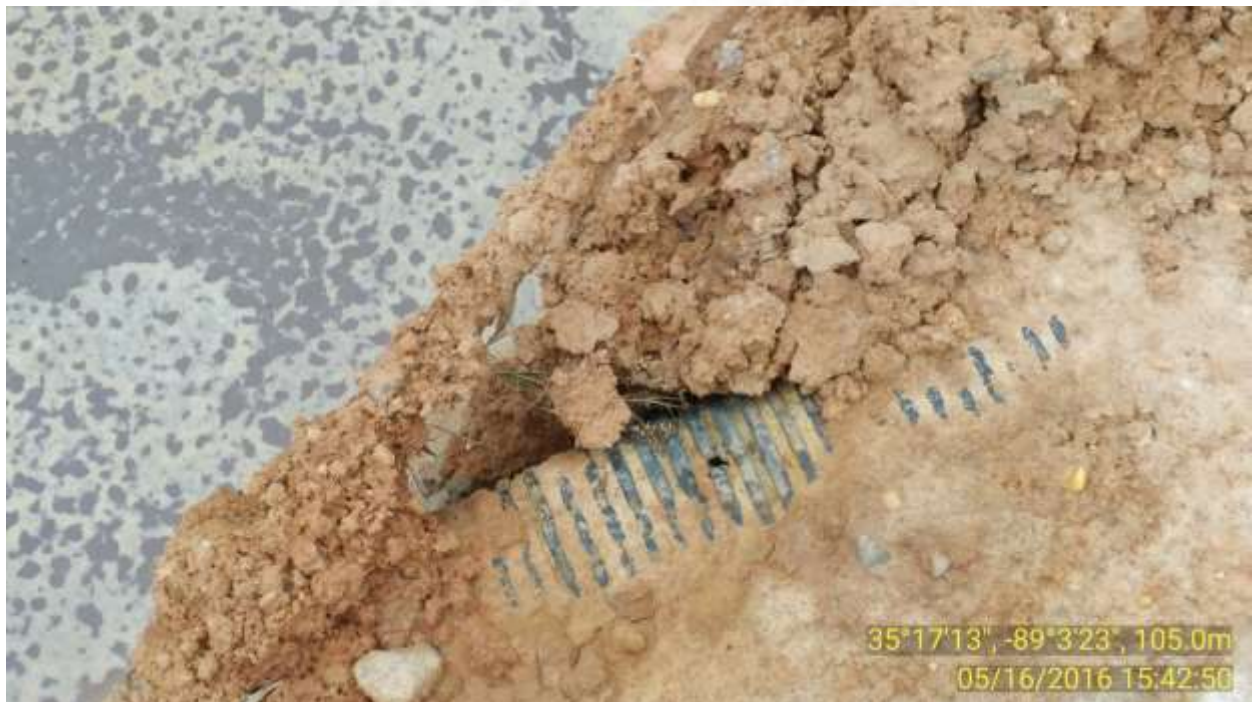
Attachments:

- (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.



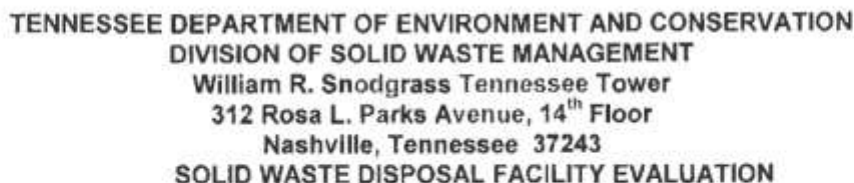
Picture 3. Primary dewatering area on the Phase III liner. This is in the area near where the original Phase IV leachate collection pipe attempted to tie-in to the Phase III leachate system. The indentation in the ground on the middle left of the picture is where this area flows into a second pit dug 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.



COMMENTS: Phase IV leachate lines have been exposed at the stack before the leachate tank run. Phase IV leachate lines on my original

of the Phase IV liner have been exposed in addition to the temporary line previously exposed. Bore at Phase III/IV intersection has allowed leachate to flow to the Phase IV liner system but the leachate is being contained there. Handeman Co. & City of Bolivar are evaluating running a sewer connection directly to the leachate tank. All

Distribution: Field Office – White Facility – Canary

CN-0761 (Rev. 12/13)

RDAs 2202 and 2499

CN-0761 (Rev. 12/13)
repair work is halted pending this evaluation