

January 9, 2018

Honorable Billy Pittard, Chairman
Oglethorpe County Board of Commissioners
P.O. Box 261
Lexington, Georgia 30648

RE: Routine Inspection and Notice of Violation Status Letter
Oglethorpe Co-US 78 C&D Landfill Phases I & II, Permit No. 109-003D(C&D)

Dear Chairman Pittard:

On October 26, 2017, I conducted a routine inspection with Adam Nation for the county's C&D Landfill. I met with you and Adam Nation on November 6, 2017 to discuss the findings for this inspection and to follow-up on the Notice of Violation issued on May 1, 2017.

The items for the recent inspection remain the same as the last inspection conducted on January 30, 2017. There were improvements made for the sediment basin retrofit and the cleaning up of the wide spread blown litter. I greatly appreciate the efforts of the county in continuing to make improvements and return to compliance. In addition, this and future inspections will include Phase I along with the active Phase II. Phase I is not in in-closure status as we discussed in our August 2017 meeting.

The inspection findings under Permit and D&O Plan Compliance are as follows:

1. There is a construction violation for the missing silt gauges for the Phase II sediment basin.


Under Performance Requirements Compliance, the landfill received a **score of 75**. Please address the following discrepancies:

2. The Phase I storm water drainage area referred as, "Existing Sediment Basin", in the Phase I D&O Plan is not included in the landfill boundary. Our District office will not be inspecting this drainage area.
3. Phase II temporary slope drains, diversion ditches, and silt fencing were not installed.
4. The slopes closest to the working face had very little vegetation. The slopes had large deep rills with exposed waste. The rills will need to be repaired and vegetation established according to the vegetative plan in the D&O plan.

5. The finished slopes of Phase II had large stands of woody vegetation (shrubs and trees). There was an area midway up the slope where erosion has set-in. This woody vegetation should be removed, and the erosion repaired. The vegetative plan should be followed to re-establish vegetation. Please consider a maintenance schedule including mowing to discourage woody vegetation growth.
6. There was no litter fencing in use. The fencing must meet the design detail contained in the D&O Plan on page C-11.
7. There was no soil stockpile for firefighting within 200 feet of the working face.
8. For the operating record, the 2017 Remaining Capacity Report has not been submitted.

On December 4, 2017, I met with Adam Nation at his request to see the progress the county is making on the above discrepancies. A great deal of progress has been made, and we discussed what was remaining. Mr. Nation will contact me once all the work is completed, and I will make another site visit. If you or your staff have questions or require assistance, please contact me at (706) 369-6376.

Sincerely,



Stephanie L. Cahill
Environmental Specialist III
Northeast District Office

Enclosure

cc: File: SW/Oglethorpe Co-US 78 C&D Landfill 109-003D(C&D)
Solid Waste Management Program

ENVIRONMENTAL PROTECTION DIVISION

Solid Waste Management Program
Atlanta Tradeport, Suite 104
4244 International Parkway
Atlanta, GA 30354

Municipal Solid Waste Evaluation Report

Facility Name: Oglethorpe Co-US 78 C&D Landfill Phases I & II

Compliance Status and Schedule

Current Status: In Compliance Out of Compliance Schedule Priority _____
 Performance Points = **75** (See Below)

Compliance Schedule Status	<u>In</u>	<u>Out</u>	<u>N/A</u>	<u>Date Due</u>
Approved Closure/Post-closure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Approved Groundwater System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Groundwater Assessment Monitoring	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____
Approved Methane System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Financial Responsibility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Violations in Categories I & II will result in automatic "out of compliance" status.

I. Permit and D & O Plan Compliance

Items of Major Environmental Impact	Construction Violations (Explain)	Operational and Maintenance Violations (Explain)
A. Groundwater	None	None
B. Surface Water Protection 1. Sediment Control 2. Leachate Control 3. Disposal in Water	Silt gauges were not installed for Phase II Sediment Basin.	None
C. Air Protection 1. Open Burning 2. Methane Elevated Levels Remediation Plan	None	None
D. Land Protection 1. Buffers 2. Sequence of Fill 3. Survey Control	None	None

II. Major Act and Rules Requirements Compliance

Compliance Status

- | | |
|--|--------------------------|
| 1. Certified Operator | <input type="checkbox"/> |
| Name: <u>Adam Nation, Certification # 2037</u> | <input type="checkbox"/> |
| 2. Maintaining Operating Record | <input type="checkbox"/> |
| 3. Weighing Procedures | <input type="checkbox"/> |
| 4. Prohibited Acts | <input type="checkbox"/> |
| 5. Prohibited Waste Disposal | <input type="checkbox"/> |
| 6. Construction Certification | <input type="checkbox"/> |

Violations in Category III resulting in less than "80" rating is "out of compliance."

III. Performance Requirements Compliance

	Compliance Status	
	Out	Points
1. <u>Environmental Protection:</u>		
A. <u>Water</u>		
1. Water monitoring data current, accompanied by certification statement;	<input type="checkbox"/>	<u>5</u>
water monitoring points identified, accessible and in good condition	<input type="checkbox"/>	0,5
2. Leachate control maintained;	<input type="checkbox"/>	<u>0</u>
runoff directed to permanent sediment control impoundment;	<input type="checkbox"/>	0,5
sediment control structures installed and maintained (ponds cleaned, silt fences, etc.)	<input checked="" type="checkbox"/>	
B. <u>Air</u>		
1. Dust control on access roads;	<input type="checkbox"/>	<u>5</u>
		0,5
2. Methane gas monitoring data current;	<input type="checkbox"/>	<u>5</u>
methane gas structures maintained	<input type="checkbox"/>	0,5
C. <u>Land</u>		
1. Facility buffers delineated and maintained;	<input type="checkbox"/>	<u>5</u>
facility survey control established and maintained	<input type="checkbox"/>	0,5
2. Disturbed areas, including stockpiles, protected, stabilized, and maintained (exposed for more than three (3) months).	<input checked="" type="checkbox"/>	<u>0</u>
		0,5
2. <u>Unloading:</u>		
A. Restricted to working face or immediate vicinity	<input type="checkbox"/>	<u>5</u>
B. Information and direction signs	<input type="checkbox"/>	0,5
3. <u>Spreading and Compaction:</u>		
A. Waste spread in uniform layers, generally two feet thick	<input type="checkbox"/>	<u>5</u>
B. Waste compacted to smallest practical volume	<input type="checkbox"/>	0,5
C. Size of working face minimized	<input type="checkbox"/>	
4. <u>30-Day Cover:</u>		
A. Compacted, clean earth, 1 foot thickness (minimum); or alternate cover applied in approved manner	<input type="checkbox"/>	<u>5</u>
		0,5
B. Placed over waste within 24 hours	<input type="checkbox"/>	<u>5</u>
C. Adequate vector control	<input type="checkbox"/>	0,5

		Compliance Status	
		Out	Points
5. <u>Intermediate Cover:</u>			
A.	Compacted, clean earth, 1 foot thickness (minimum)	<input type="checkbox"/>	<u>5</u> 0,5
B.	Placed over each portion of any intermediate lift/area following completion of that portion	<input type="checkbox"/>	<u>5</u> 0,5
6. <u>Final Cover:</u>			
A.	Final cover applied and certified according to closure plan	<input type="checkbox"/>	<u>5</u> 0,5
B.	Finished areas vegetated and stabilized per closure plan	<input checked="" type="checkbox"/>	<u>0</u> 0,5
7. <u>Grading and Drainage:</u>			
A.	Slopes of disposal area sufficient to maximize runoff and minimize erosion (3% to 33% - final grade)	<input type="checkbox"/>	<u>5</u> 0,5
B.	Surface water run-on and runoff controls provided and maintained	<input type="checkbox"/>	<u>5</u> 0,5
8. <u>Continuity of Operation:</u>			
A.	All weather access road to disposal area	<input type="checkbox"/>	<u>5</u>
B.	Provisions for prompt equipment repair or replacement	<input type="checkbox"/>	<u>0,5</u>
C.	Access authorized to authorized entrance	<input type="checkbox"/>	
D.	Authorized entrance closed when site is not in operation	<input type="checkbox"/>	
9. <u>Rubbish and Litter Control:</u>			
A.	Exposed rubbish and debris (except in designated recovered materials area)	<input type="checkbox"/>	<u>0</u> 0,5
B.	Litter control (fencing or other barriers, daily policing)	<input checked="" type="checkbox"/>	
10. <u>Fire Protection:</u>			
A.	Earth stockpile one day supply within 200' of working face	<input checked="" type="checkbox"/>	<u>0</u>
B.	Approved alternative method	<input type="checkbox"/>	<u>0,5</u>
C.	Soil stockpiles (overburden, fire control, cover) places so as not to be a "cave in" threat to open trenches	<input type="checkbox"/>	
11. <u>Waste Requiring Special Handling:</u>			
A.	Recovered materials area maintained	<input type="checkbox"/>	<u>5</u>
B.	Yard trimmings composting area maintained	<input type="checkbox"/>	<u>0,5</u>
C.	Proper operation of air curtain destructor	<input type="checkbox"/>	
D.	Special provisions for immediate disposal of dead animals or highly putrescible waste (eggs, entrails, offal, etc.)	<input type="checkbox"/>	
E.	Provisions for handling asbestos or other waste requiring special handling	<input type="checkbox"/>	

Performance Points

75

4. Seismic Impact Zones (new and lateral expansions)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Unstable Areas				
a. Signature and seal of registered GA P.E.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Certification of structural integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B. Procedures for Excluding Prohibited Waste				
1. Written procedures for random inspections	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Inspection records	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Personnel records of training	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Copies of notification sent to director when hazardous waste is discovered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C. Gas Monitoring				
1. Quarterly monitoring results	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. If methane exceeds limits provide written record	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a. Within 7 days, levels detected and steps taken to protect human health	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Within 60 days, implementation of remediation plan and Director notified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D. Liquid Waste Restrictions				
1. Liquid waste prohibited	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Liner and leachate collection system	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Gas condensate management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Leachate management records	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E. Groundwater Monitoring				
1. Approved plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Certification of installation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Monitoring reports	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
F. Closure and Post Closure Criteria				
1. Closure Criteria				
a. Approved plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Notice of final closure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Copy of deed to include:				
1. Notice of landfill operation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Legal description location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Type of waste deposited	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Confirmation (written) of b & c recorded on deed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Signed compliance certification by GA P.E.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Post Closure Criteria				
a. Approved plan	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Results of all monitoring activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Notice to Director within 5 days of exceedance of standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Remediation plan within 30 days	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| e. copy of written approval for removal of any contaminated material | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

G. Financial Assurance

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| 1. Written cost estimates | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Copy of financial instrument | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Written justification for reduction in cost of reimbursements paid out | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Notice to Director for any of the above necessary | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

H. Measuring and Reporting Requirements

- | | | | | |
|--------------------------------------|--------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 1. Quarterly tonnage reports | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Annual remaining capacity reports | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Annual tonnage fees | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Compliance evaluation reports | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Inspection Narrative:

The inspection covered Phases I and II of the C&D Landfill.

Category I. Permit and D&O Plan Compliance

Construction Violations: Phase II sediment basin silt gauges were not installed and constructed according to the D&O Plan. The need for clean-out was undetermined. This was not corrected from the last inspection.

The Phase I storm water drainage area referred as, "Existing Sediment Basin", in the Phase I D&O Plan is not included in the landfill boundary. Our District office will not be inspecting this drainage area.

Category III. Performance Requirements Compliance

1.A.2 Water (Sediment Control Structures): Phase II temporary slope drains, diversion ditches and silt fencing were not installed per the D&O Plan. These items were not corrected from the last inspection.

1.C.2. Land (Soil Stabilization): The western slopes closest to the working face had thin vegetation. These slopes had large rills with exposed waste. This was not corrected from the last inspection and has worsened.

6. Final Cover: The finished slopes of Phase II have large stands of woody vegetation (shrubs and trees). There was an area midway up the slope where significant erosion has set-in. This was not corrected from the last inspection.

9. Rubbish and Litter Control: There was no litter fencing in use. The litter fencing must meet the design detail contained in the D&O Plan on page C-11. This was not corrected from the last inspection.

10. Fire Protection: There was no soil stockpile for firefighting within 200 feet of the working face. This was not corrected from the last inspection.

Operating Record

H. Measuring and Reporting Requirements: The 2017 Remaining Capacity Report has not been submitted.