

Georgia Department of Natural Resources

Environmental Protection Division • Northeast District

745 Gaines School Road, Athens, Georgia 30605

Phone: (706) 369-6376 • Fax: (706) 369-6398

Richard E. Dunn, Director

July 7, 2016

Oglethorpe County Board of Commissioners
P.O. Box 261
Lexington, Georgia 30648

Attn: Honorable Billy Pittard
Chairman

Re: **Compliance Evaluation**

Oglethorpe County C&D Landfill

Permit No. 109-003D(C&D)

Oglethorpe County

Dear Mr. Pittard:

On June 21, 2016, Thomas Moore and I conducted a routine compliance inspection for the above facility. The facility received a **passing score of 80**.

The inspection's findings include the following:

- Check-dams were in need of maintenance.
- Groundwater and methane monitoring well access paths and pads were in need of maintenance.
- There was no soil stockpile within 200 feet of the working face for fire fighting purposes.

As discussed by phone on July 6, 2016 with Mr. Adam Nation, there were other noteworthy findings:

- The grass has died in the future cells' field between the drainage ditch and current working face. Rills have begun and will worsen quickly with each rain event.
- The need for 30-Day Cover which Mr. Nation explained has begun and the mound has been recently surveyed to get new benchmarks and elevations to assist in accurate cover application.

If you have any questions or comments, please do not hesitate to contact me at (706) 369-6376.

Sincerely,



Stephanie L. Cahill
Environmental Specialist III
Northeast District

Enclosure

BP cc: File: SW/Oglethorpe County/Oglethorpe County C&D Landfill
Mr. Adam Nation, Public Works Director
Solid Waste Management Program



Municipal Solid Waste Evaluation Report

Facility Name: Oglethorpe County C&D Landfill

Compliance Status and Schedule

Current Status: In Compliance Out of Compliance Schedule Priority
 Performance Points = 80 (See Below)

Compliance Schedule Status	In	Out	N/A	Date Due
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	None	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>Heidi Tidwell Cert# 1240</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. Environmental Protection:			
A. <u>Water</u>			
1.	Water monitoring data current, accompanied by certification statement; water monitoring points identified, accessible and in good condition	<input type="checkbox"/>	<u>0</u> 0,5
		<input checked="" type="checkbox"/>	
2.	Leachate control maintained; runoff directed to permanent sediment control impoundment; sediment control structures maintained (ponds cleaned, silt fences maintained, etc.)	<input type="checkbox"/>	<u>0</u> 0,5
		<input type="checkbox"/>	
		<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; methane gas structures maintained	<input type="checkbox"/>	<u>0</u> 0,5
		<input checked="" type="checkbox"/>	
C. <u>Land</u>			
1.	Facility buffers delineated and maintained; facility survey control established and maintained	<input type="checkbox"/>	<u>5</u> 0,5
		<input type="checkbox"/>	
2.	Disturbed areas, including stockpiles, protected, stabilized, and maintained (exposed for more than three months).	<input type="checkbox"/>	<u>5</u> 0,5
2. Unloading:			
A.	Restricted to working face or immediate vicinity	<input type="checkbox"/>	<u>5</u>
B.	Information and direction signs	<input type="checkbox"/>	<u>0,5</u>
3. Spreading and Compaction:			
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"/>	<u>0,5</u>
C.	Size of working face minimized	<input type="checkbox"/>	
4. 30-Day Cover:			
A.	Compacted, clean earth, 12" 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"/>	<u>0,5</u>

		Compliance Status	
		Out	Points
5. <u>Intermediate Cover:</u>			
A.	Compacted, clean earth, 1' 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 type="checkbox"/>	<u>5</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"/>	0,5
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>5</u>
			0,5
B.	Litter control (fencing or other barriers, daily policing)	<input 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"/>	0,5
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"/>	0,5
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

80

Location of current operation

Estimated site life remaining: 9.7 yrs

Phase	2	Area/Trench/Cell	32/33	Lift	2
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Time of inspection: 9:10 a.m. p.m. Weather Conditions: clear and cool

Reason for inspection: Routine Other _____

Discussed with:

Name	Title	Address	Telephone
Heidi Tidwell,	Scalehouse Operator	P.O. Box 261, Lexington, Georgia 30648	706-743-3649

Copy of this report submitted to:

Name	Title	Address	Telephone
Honorable Billy Pittard,	Chairman	P.O. Box 261, Lexington, Georgia 30648	706-743-3649

Photographs: Yes No Location Facility File

Inspector: Stephanie L. Cahill ES III, Certification Number 1946

Reviewer: *Bonnie Pope* Review Date: 7/6/16

Attachments: _____

Facility Operating Record

Compliance Status

Director Notified	In	Out	N/A
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A. Location Restrictions

- | | | | |
|--|--------------------------|-------------------------------------|--------------------------|
| 1. Airport Safety | | | |
| a. Location Restriction | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Bird Hazard | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Flood Plains | | | |
| a. 100 year flood not restricted | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Reduction in floodplain will not cause flooding | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Landfill adequately protected from washout of solid waste | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Wetlands | | | |
| a. USCOE jurisdictional determination made | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Permits obtained where necessary | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Seismic Impact Zones (new and lateral expansions) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Unstable Areas | | | |
| a. Signature and seal of registered GA P.E. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Certification of structural integrity | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Personnel records of training | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> |
| 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 checked="" type="checkbox"/> | <input 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"/> |

Comments or Discrepancies Noted:

Groundwater and Methane Monitoring Wells

- Well access paths were in need of maintenance: mowing and trimming of vegetation.
- Well pads were in need of maintenance: grass cut around pads and pads cleaned off.

Other

- Rock check-dams were in need of maintenance: cleaned out and re-establish.
- There was no stock pile of soil within 200 feet of the working face for fire fighting purposes.

Other noteworthy findings:

- The grass in the future cells' field has died. Rills have begun and will worsen quickly.
- The need for 30-Day Cover for exposed waste. 30-Day Cover had been recently applied to the northeast slope.