Georgia Department of Natural Resources

Environmental Protection Division • West Central District

2640 Shurling Drive • Macon • Georgia 31211 Phone: 478/751-6612 • Fax: 478/751-6660 Mark Williams, Commissioner F. Allen Barnes, Director

October 12, 2011

Mr. Tim Bassett, Environmental Protection Manager Waste Management - Turkey Run Landfill 3001 South Pioneer Drive SE Smyrna, Georgia 30082

> RE: Response Letter

Turkey Run MSWL

Permit No. 099-019(D) MSWL

Meriwether County

Dear Mr. Bassett:

This letter will serve to confirm receipt of your letter dated October 6, 2011 submitted in response to the Division's inspection report and letter dated September 15, 2011. Your correspondence requested that the Division review and reissue the inspection report. The Division has reviewed your correspondence and has the following comments:

- · Your letter stated that daily operations include hauling cover soil to the working face throughout the day. The Division is aware that soil is hauled to the working face throughout the day. However, the Rules for Solid Waste Management require a daily cover stockpile and a fire protection stockpile at ALL times. Therefore, the Division considers the deduction noted on the inspection report to be accurate.
- Your letter also addressed stabilizing the outside face of Cell 1. Upon review of the documentation provided, the Division has modified the inspection report. See attached.

The attached, revised inspection report reflects that the facility received an acceptable rating of 90 performance points. Should you have questions pertaining to this or any other matter, please feel free to contact me at (478) 751-6612.

Sincerely,

Henry Jordan

Environmental Specialist

Henry & Josen

West Central District

cc: LPB/Cown - letter, inspection report

J:\Jordan\Solid Waste\2011\Meriwether\Turkey Run\response letter 10-12-11.doc

Georgia Department of Natural Resources Environmental Protection Division 4244 International Parkway, Suite 114

ISWL)



Municipal Solid Waste Evaluation Report

Facility Name:	Turkey Run MSWI	-	···	·	
Compliance Statu	is and Schedule				
Current Status:	In Compliance ☑ rformance Points =	Out of Comp	liance (See Be	☐ Schedu	ule Priority
Compliance Sch Approved Closure/ Approved Groundw Groundwater Asses Approved Methane Financial Respon Other	Post-closure vater System ssment Monitoring System	<u>n</u> V V V V	<u>Out</u>	<u>N/A</u>	Date Due
Violations in Cate	gories I & II will res	ult in autom	atic "ou	t of comp	liance" status.
l. Permit and D &	O Plan Compliance				
	O Plan Compliance vironmental Impact	Construction (Explain)	n Violati	ons	Operational and Maintenance Violations (Explain)
A. Groundwater B. Surface Water 1. Sedim 2. Leach 3. Dispose C. Air Protection 1. Open 2. Metha	Protection nent Control ate Control sal in Water Burning ne ned Levels diation Plan	Construction	on Violati	ons	

II.	Majo	or Act and Rules Requirements Compliance		
			Compliance Status	
			Out	
1.	Cert	fied Operator		
	ame:	Gabe Gribble 1530	$\overline{\Box}$	
		taining Operating Record	ī	
		ghing Procedures	\Box	
		ibited Acts		
		ibited Acts ibited Waste Disposal		
		•	LJ	
О.	CON	struction Certification		
\/:	alatio	and in Cotogon, Ill requiting in loss than "90" reting is "aut o	f compliance !!	
		ons in Category III resulting in less than "80" rating is "out o	or compliance.	
HI.	. Perr	ormance Requirements Compliance		
			Compliano	
1.		ronmental Protection:	Out	Points
	A.	<u>Water</u>	_	
		Water monitoring data current, accompanied		5
		by certification statement;		0,5
		water monitoring points identified, accessible		
		and in good condition		
		2. Leachate control maintained;		5
		runoff directed to permanent sediment control		0,5
		impoundment;	П	•,•
		sediment control structures maintained (ponds		
		cleaned, silt fences maintained, etc.)		
	В.	Air		
	<i>D</i> ,	1. Dust control on access roads;	П	P.*
		1. Dust control on access loads,	Ļ	5
		2. Mothana gas manitaring data summert.	[]	0,5
		Methane gas monitoring data current;		5
	^	methane gas structures maintained		0,5
	C.	Land		
		Facility buffers delineated and maintained;		5
		facility survey control established and maintained		0,5
		2. Disturbed areas, including stockpiles, protected,		
		stabilized, and maintained (exposed for more than		5
		three months).		0,5
2.	<u>Unio</u>	ading:		
	A.	Restricted to working face or immediate vicinity		5
	B.	Information and direction signs		0,5
3.	Spre	ading and Compaction:		-,-
	A.	Waste spread in uniform layers, generally two feet thick	П	5
	В.	Waste compacted to smallest practical volume		0,5
	C.			0,5
A		Size of working face minimized		
4.		Cover:		_
	A.	Compacted, clean earth, 6" thickness (minimum); or		5
	_	alternate cover applied in approved manner		0,5
	В.	Placed over waste within 24 hours		5
	C.	Adequate vector control		0,5

			Out	Points
5.	<u>Inter</u>	mediate Cover:	Out	1 Onto
	A.	Compacted, clean earth, 1' thickness (minimum)		5
	B.	Placed over each portion of any intermediate lift/area		0,5 5
6.		following completion of that portion Cover:		0,5
	A.	Final cover applied and certified according to closure plan		5
	B.	Finished areas vegetated and stabilized per closure plan		0,5 5
7.	Grad	ing and Drainage:		0,5
	A.	Slopes of disposal area sufficient to maximize runoff and minimize erosion (3% to 33% - final grade)		5
	B.	Surface water run-on and runoff controls provided and maintained		0,5 5
8.	Conti	nuity of Operation:		0,5
	A.	All weather access road to disposal area		_
	B.	Provisions for prompt equipment repair or replacement		5
	C.	Access authorized to authorized entrance		0,5
	D.	Authorized entrance closed when site is not in operation		
9.	Rubb	ish and Litter Control:		
	A.	Exposed rubbish and debris (except in designated		^
		recovered materials area)	☑ .	0
	B.	Litter control (fencing or other barriers, daily policing)	\Box	0,5
10.	<u>Fire</u>	Protection:		
	A.	Earth stockpile one day supply within 200' of working face	V	^
	B.	Approved alternative method		<u> </u>
	C.	Soil stockpiles (overburden, fire control, cover) places so		0,5
		as not to be a "cave in" threat to open trenches		
11.	Wast	e Requiring Special Handling:		
	A.	Recovered materials area maintained		5
i	B.	Yard trimmings composting area maintained		0,5
+	C.	Proper operation of air curtain destructor	Ä	0,0
i	D.	Special provisions for immediate disposal of dead	П	
		animals or highly putrescrible waste (eggs, entrails, offal, etc.)		
	Ξ.	Provisions for handling asbestos or other waste		
		requiring special handling	_	
		Performance Points	_	90

Location of current operation:			Estimated site life remaining:			70.4 years	
Phase		Area/Tre	nch/Cell	Cell 1/2A	Lift	3	
Time of inspection	:7:4	<u>5</u> a.m. ☑	p.m. 🗌	Weather Condit	ions:	clear	
Reason for inspec	tion:	Routine	V	Other 🗹	follow-u	p	
Discussed with: Name Gabe Gribble, Dist	Title rict Manag	er, 7144 Lo	Address oan Oak Roa	ad, Hogansville, Ge	eorgia 302	Telephone 30, 706-637-8520	
		· · · · · · · · · · · · · · · · · · ·	·				
Copy of this repo Name	rt submitt Title	ed to:	Address			Telephone	
Gabe Gribble, Dist	rict Manag	er, 7144 Lo	oan Oak Roa	ad, Hogansville, Ge	eorgia 302	30, 706-637-8520	
	•						
Photographs:	Yes ☑	No 🗆		Location	Office fi	les	
Inspector:	Henry Jo	ordan					
Reviewer: -		OSY A	leason	Review Da	ate:	10/13/11	
Attachments:							

Facility Operating Record

		Compliand Director Notified	e Status In	Out	N/A
	Location Restrictions				
1.	Airport Safety		F3		
	a. Location Restriction		✓		
_	b. Bird Hazard		<u> </u>		LJ
2.	Flood Plains				
	a. 100 year flood not restricted		✓		
	b. Reduction in floodplain will not cause flooding		<u>√</u>		
	c. Landfill adequately protected from washout of solid waste		لشنا	اسط	<u></u> f
3	Wetlands				
٠.	a. USCOE jurisdictional determination made		V		
	b. Permits obtained where necessary		<u></u>		
4.	Seismic Impact Zones (new and lateral expansions)		V		
	Unstable Areas				
	a. Signature and seal of registered GA P.E.		V		
	b. Certification of structural integrity		✓		
В.	Procedures for Excluding Prohibited Waste				
1.	Written procedures for random inspections		V		
2.	Inspection records		✓		
	Personnel records of training		$\overline{\mathbf{Q}}$		
4.	Copies of notification sent to director when		✓		
	hazardous waste is discovered				
	Gas Monitoring	,,,,,,	_	_	
	Quarterly monitoring results		<u> </u>		
2.	If methane exceeds limits provide written record				V
	a. Within 7 days, levels detected and			F	
	steps taken to protect human health		<u></u>		\Box
	Within 60 days, implementation of remediation plan and Director notified	П		["]	V
	remediation plan and Director notified	L J	لسما	LJ	[* _
D.	Liquid Waste Restrictions	_			
	Liquid waste prohibited		<u> </u>		
	Liner and leachate collection system	닏	$\overline{\square}$	Щ	
	Gas condensate management				
4.	Leachate management records		V		Ш
	Groundwater Monitoring	ļī	, -		
	Approved plan				
	Certification of installation		$\overline{\mathbf{A}}$		
	Monitoring reports	\sqcup	✓		
_	Closure and Poet Closure Criteria				

1.	Closure Criteria				
	a. Approved plan		V		
	b. Notice of final closure				7
	c. Copy of deed to include:				
	1. Notice of landfill operation				V
	2. Legal description location				<u> </u>
	3. Type of waste deposited				<u> </u>
	d. Confirmation (written) of b & c		_	_	
	recorded on deed				$\overline{\checkmark}$
	e. Signed compliance certification by				_
	GA P.E.				\checkmark
2.	Post Closure Criteria				
	a. Approved plan		V		
	b. Results of all monitoring activities				<u>~</u>
	c. Notice to Director within 5 days of				
	exceedance of standards				V
	d. Remediation plan within 30 days				$\overline{\square}$
	e. copy of written approval for removal of			_	<u></u>
	any contaminated material				\checkmark
1. 2.	Financial Assurance Written cost estimates Copy of financial instrument		7		
	Written justification for reduction in cost of	provide the second	_	_	
	reimbursements paid out		V		
	Notice to Director for any of the above		_		_
	necessary		v		
Н.	Measuring and Reporting Requirements				
	Quarterly tonnage reports		✓		
2.	Annual remaining capacity reports		✓		
	Annual tonnage fees		$\overline{\mathbf{Q}}$		
4.	Compliance evaluation reports		✓		
	mments or Discrepancies Noted: attached letter	******			

Revis	sed August 2001	****			





October 6, 2011

Mr. Henry Jordan
Environmental Specialists
Georgia Department of Natural Resources
West Central District
2640 Shurling Drive
Macon, Georgia 31211

RE: Turkey Run Landfill - September 13, 2011 EPD Inspection Report

Dear Mr. Jordan,

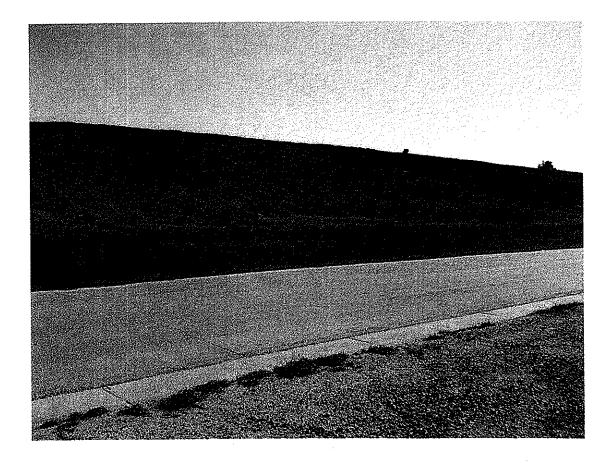
Turkey Run Landfill is in receipt of your letter dated September 15th to Mr. Gabe Gribble concerning your recent inspection conducted on September 13th. In the letter you stated that several operational discrepancies /violations were noted and needed attention and as a result points were deducted from the site's overall score. This letter is being written address two of the alleged discrepancies and to provide documentation that these two items were in fact not violations and therefore points should have not been deducted. A summary of the discrepancy and WM supporting evidence is provided below:

 EPD Discrepancy – There was only one truckload of cover soil adjacent to the working face. A daily cover stockpile and a fire protection stockpile must be maintained at all times.

WM Response – The site actively conducts operations to haul cover dirt to the working face to assure that cover dirt is available for the end of the day. Part of this daily operation, is to also provide a stockpile for fire protection. The fire protection stockpile is normally in place before daily MSW operations begin every morning. On the evening of September 12th site personnel moved the location of the tipper and the active working face and used the fire protection stockpile for cover. The attached picture from September 13th, which is date stamped and saved on Gabe's Blackberry, shows the site actively hauling cover dirt to the fire suppression and cover dirt stockpile. WM requests that you reconsider this point deduction.



• EPD Discrepancy - Disturbed areas that will not be re-disturbed in 90 days must be stabilized/vegetated as required by the D&O plan.
WM Response - During the inspection there were no disturbed areas that had exceeded the 90 day period for stabilization. The site had been working on the outside face of Cell 1 to correct grades and had just recently finished the work on September 1, 2011. On completion of the grading, the site contracted with McCoy Grading to stabilize and grass the slope. This grassing and stabilization work was conducted on September 19, 2011 less than three weeks from date of grading completion. WM disagrees with your point deduction for this discrepancy and request that you reconsider this deduction. The attached picture which is also date stamped and saved on Gabe's blackberry shows the completed grading of the side slope on September 1st.



While we appreciate your overall interpretation that the site is operating in compliance, we strive for excellence in our daily operations and a site score of 85 is very disappointing, especially when we believe it is not deserved. Therefore, we respectfully ask that you review this supporting evidence and reissue the inspection report adding 10 points back to overall score. Thank you for your consideration in this matter.

If you have any questions please feel free to Gabe Gribble at the site or myself at (404) 808-8098.

Sincerely,

Tim Bassett

Environmental Protection Manager

South Atlantic - Atlanta Area

Cc: Mr. Gene Barnes - Director of Landfill Operations

Site Operating Record

Georgia Department of Natural Resources

Environmental Protection Division • West Central District 2640 Shurling Drive • Macon • Georgia 31211

Phone: 478/751-6612 • Fax: 478/751-6660

Mark Williams, Commissioner

F. Allen Barnes, Director

September 15, 2011

Mr. Gabe Gribble, District Manager Waste Management - Turkey Run Landfill 7144 Lone Oak Road Hogansville, Georgia 30230

RE:

Routine and Follow-up Inspection

Turkey Run MSWL

Permit No. 099-019(D) MSWL

Meriwether County

Dear Mr. Gribble:

This letter will serve to confirm the inspection conducted of the above referenced facility on Tuesday, September 13, 2011. The inspection was conducted to determine compliance with the Act, Rules, and Regulations for Solid Waste Management, the Permit, the D&O plan, and the Division's previous correspondence. The facility received an acceptable rating of 85 performance points and was found to be operating in compliance the day of the inspection. The following operational discrepancies/violations were noted and require attention:

- Disturbed areas that will not be re-disturbed in 90 days must be stabilized/vegetated as required by the D&O plan.
- A minor modification must be submitted and approved to show the location of the scrap tire storage container.
- Flagging/windblown waste was noted on top of Cells 1/2A and along the slope of Cell 1.
- There was only one truckload of cover soil adjacent to the working face. A daily cover stockpile and a fire protection stockpile must be maintained at all times.

The Division requests that the above referenced discrepancies be corrected in a timely manner. Please ensure that this office is copied on the cover letters for groundwater and methane monitoring reports. Should you have questions pertaining to this or any other matter, please feel free to contact me at (478) 751-6612.

Sincerely,

Henry Jordan

Environmental Specialist

Henry & Joseph

West Central District

cc: LPB/Cown - letter, inspection report, and data tracking sheet

J:\Jordan\Solid Waste\2011\Meriwether\Turkey Run\letter 9-15-11.doc

Georgia Department of Natural Resources Environmental Protection Division 4244 International Parkway, Suite 114

County:	Meriwether
Date:	9/13/2011
Permit #:	099-019D(MSWL)



Municipal Solid Waste Evaluation Report

Facility Name:	Turkey Run MSWL				
Compliance Sta	tus and Schedule				
Current Status: F	In Compliance	Out of Comp 85	liance (See Bel	Schedu	le Priority
Approved Closur Approved Groun	dwater System sessment Monitoring ne System	<u>n</u>	Out	<u>N/A</u>	Date Due
	itegories I & II will res & O Plan Compliance		natic "ou	it of comp	liance" status.
Items of Major	Environmental Impact	Construction (Explain)	on Violat	ions	Operational and Maintenance Violations (Explain)
2. Lea					
C. Air Protection 1. Op 2. Me	on en Burning				
D. Land Prote 1. Bu	ction				

II. Major Act and Rules Requirements Compliance Compliance Status Out 1. Certified Operator Name: Gabe Gribble 1530 2. Maintaining Operating Record 3. Weighing Procedures 4. Prohibited Acts 5. Prohibited Waste Disposal 6. Construction Certification Violations in Category III resulting in less than "80" rating is "out of compliance." III. Performance Requirements Compliance Compliance Status 1. Environmental Protection: Out **Points** Α. Water 1. Water monitoring data current, accompanied 5 0,5 by certification statement; water monitoring points identified, accessible П and in good condition 2. Leachate control maintained: 5 0.5 runoff directed to permanent sediment control impoundment; sediment control structures maintained (ponds cleaned, silt fences maintained, etc.) B. Air 1. Dust control on access roads: 2. Methane gas monitoring data current; 5 methane gas structures maintained C. Land Facility buffers delineated and maintained; facility survey control established and maintained 2. Disturbed areas, including stockpiles, protected, 1 stabilized, and maintained (exposed for more than three months). 2. Unloading: Α. Restricted to working face or immediate vicinity 5 B. Information and direction signs 0.5 3. Spreading and Compaction: Waste spread in uniform layers, generally two feet thick П Α. B. Waste compacted to smallest practical volume 0.5 C. Size of working face minimized 4. Daily Cover:

Compacted, clean earth, 6" thickness (minimum); or

alternate cover applied in approved manner

Placed over waste within 24 hours

Adequate vector control

Α.

B.

C.

0,5

5

0.5

			Compliand	Points
	Inter	mediate Cover:	•	, 4
' .	A.	Compacted, clean earth, 1' thickness (minimum)		5
	<i>7</i> \.	Compacion, order cardi, 7 discretes (0,5
	B.	Placed over each portion of any intermediate lift/area		5
	υ.	following completion of that portion		0,5
3	Final	Cover:		·
•	A.	Final cover applied and certified according to closure plan		5
	7	Time outer applied and common describing to see any		0,5
	B.	Finished areas vegetated and stabilized per closure plan		5
	Δ.	, menous dispersion in the contract of the con		0,5
7.	Grad	ling and Drainage:		
	<u> </u>	Slopes of disposal area sufficient to maximize runoff and		5
		minimize erosion (3% to 33% - final grade)		0,5
	B.	Surface water run-on and runoff controls provided		5
	_,	and maintained		0,5
8.	Conf	tinuity of Operation:		
	<u>A</u> .	All weather access road to disposal area		5
	B.	Provisions for prompt equipment repair or replacement		0,5
	C.	Access authorized to authorized entrance		
	D.	Authorized entrance closed when site is not in operation		
9.	Rub	bish and Litter Control:		
	A.	Exposed rubbish and debris (except in designated	V	0
		recovered materials area)		0,5
	B.	Litter control (fencing or other barriers, daily policing)		
10). <u>Fir</u>	Protection:		
	A.	Earth stockpile one day supply within 200' of working face	V	0
	B.	Approved alternative method		0,5
	C.	Soil stockpiles (overburden, fire control, cover) places so		
		as not to be a "cave in" threat to open trenches		
11	I. <u>Wa</u>	ste Requiring Special Handling:		
	A.	Recovered materials area maintained		5
	В.	Yard trimmings composting area maintained		0,5
	C.	Proper operation of air curtain destructor		
	D.	Special provisions for immediate disposal of dead		
		animals or highly putrescrible waste (eggs, entrails,		
		offal, etc.)	,	
	Ē.	Provisions for handling asbestos or other waste		
		requiring special handling	<u>-</u>	
		B. A. B. Maria		85
		Performance Points		QΟ

Estimated site life remaining: Location of current operation: 70.4 years Area/Trench/Cell Phase Cell 1/2A Lift Time of inspection: 7:45 a.m. ☑ p.m. □ Weather Conditions: clear Reason for inspection: Routine 🗹 Other 🗹 follow-up Discussed with: Name Title Telephone Address Gabe Gribble, District Manager, 7144 Loan Oak Road, Hogansville, Georgia 30230, 706-637-8520 Copy of this report submitted to: Name Title Address Telephone Gabe Gribble, District Manager, 7144 Loan Oak Road, Hogansville, Georgia 30230, 706-637-8520 Photographs: Yes ☑ No 🗌 Location Office files

Inspector:

Reviewer:

Attachments:

Henry Jordan

Review Date:

Facility Operating Record

		Compliand Director Notified	e Status In	Out	N/A
A.	Location Restrictions				
1.	Airport Safety				
	a. Location Restriction		✓		
	b. Bird Hazard		7		
2.	Flood Plains			٠	
	a. 100 year flood not restricted		7		
	b. Reduction in floodplain will not cause flooding		<u> </u>		
	 c. Landfill adequately protected from washout of solid waste 		V		
3.	Wetlands				
	 a. USCOE jurisdictional determination made 		V		
	b. Permits obtained where necessary		<u> </u>		
	Seismic Impact Zones (new and lateral expansions) Unstable Areas			\bigsqcup_{\cdot}	
	 a. Signature and seal of registered GA P.E. 		7		
	b. Certification of structural integrity		V		
В.	Procedures for Excluding Prohibited Waste				
1.	Written procedures for random inspections		~		
	Inspection records		7		
	Personnel records of training		7		
4.	Copies of notification sent to director when		7		
	hazardous waste is discovered				
C.	Gas Monitoring				
1.	Quarterly monitoring results		7		
2.	If methane exceeds limits provide written record				V
	 a. Within 7 days, levels detected and 				
	steps taken to protect human health				✓
	b. Within 60 days, implementation of				
	remediation plan and Director notified				V
D.	Liquid Waste Restrictions				
1.	Liquid waste prohibited		7		
	Liner and leachate collection system		<u> </u>		
	Gas condensate management		V		
4.	Leachate management records		V		
	Groundwater Monitoring				
1.			<u> </u>		
2.			<u> </u>		
	Monitoring reports		7	Ц	
-	LINGUED SOO MORT CLOCKING CRITATIA				

Closure Criteria				
 a. Approved plan 		7	<u> </u>	
b. Notice of final closure				<u></u>
c. Copy of deed to include:	±-			
 Notice of landfill operation 				V
Legal description location				7
Type of waste deposited				V
d. Confirmation (written) of b & c				
recorded on deed				V
e. Signed compliance certification by		r-m-q	,	
GA P.E.			لسا	\Box
2. Post Closure Criteria				
a. Approved plan	П	[7]	[]	
b. Results of all monitoring activities				<u></u>
c. Notice to Director within 5 days of		لسا	ليا	₾
exceedance of standards		\Box	Π,	$\overline{\checkmark}$
d. Remediation plan within 30 days	Ä	Ä		
e. copy of written approval for removal of			_	لسسا
any contaminated material				V
 G. Financial Assurance Written cost estimates Copy of financial instrument Written justification for reduction in cost of reimbursements paid out Notice to Director for any of the above necessary Measuring and Reporting Requirements Quarterly tonnage reports Annual remaining capacity reports Annual tonnage fees Compliance evaluation reports 				
Comments or Discrepancies Noted: See attached letter		[4]		L
	·	·		

	<u></u>			
Revised August 2001				