



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Mountain District Office

16 Center Road
Cartersville, Georgia 30121
770-387-4900

Correspondence:
Post Office Box 3250
Cartersville, Georgia 30120

JUL 12 2018

Mr. Trey Allen
Advanced Disposal
Eagle Point Landfill
8880 Old Federal Road
Ball Ground, Georgia 30107

Re: Routine Inspection
Eagle Point Landfill
Permit No. 058-012D(MSWL)
Forsyth County

Dear Mr. Allen:

This is to confirm the routine inspection conducted on July 10, 2018 at the referenced facility to determine compliance with the Solid Waste Handling Permit and the Rules and Regulations for Solid Waste Management. Site operations received a satisfactory rating of 100.

EPD continues to receive many odor complaints about Eagle Point Landfill. This EPD inspection concludes that workface management is satisfactory at the site, but EPD will continue to work with the landfill to find ways to minimize the odors.

Attached is a copy of the inspection report for your review and is to be placed in your facility's operating file. Within thirty (30) days of receipt of this letter, please submit a response on how the deficiency noted above will be corrected.

EPD appreciates your willingness to comply with the Rules and Regulations. If there are any questions concerning this matter, I may be reached at (770) 387-4900.

Sincerely,

Jason Rogers
Environmental Compliance Specialist Mountain
District Office

Enclosure:
Evaluation Report
C: EPD Solid Waste Management Suite 104



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

County: Forsyth
Date: 10-Jul-18
Permit #: 058-012D(MSWL)

ENVIRONMENTAL PROTECTION DIVISION

Land Protection Branch
4244 International Parkway, Ste 104
Atlanta, Georgia 30354

Municipal Solid Waste Evaluation Report

Facility Name: Eagle Point Landfill

Compliance Status and Schedule

Current Status: In Compliance Out of Compliance Schedule Priority _____
Performance Points = 100 (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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 checked="" 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 | | |
| B. Surface Water Protection 1. Sediment Control 2. Leachate Control 3. Disposal in Water | | |
| C. Air Protection 1. Open Burning 2. Methane Elevated Levels Remediation Plan | | |
| D. Land Protection 1. Buffers 2. Sequence of Fill 3. Survey Control | | |

II. Major Act and Rules Requirements Compliance

| | Compliance Status |
|---------------------------------|---------------------------------|
| 1. Certified Operator | Out <input type="checkbox"/> |
| Name: <u>Travis McDaniel</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>5</u> 0,5 |
| 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>5</u> 0,5 |
| 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>5</u> 0,5 |
| C. <u>Land</u> | | |
| 1. Facility buffers delineated and maintained; facility survey control established and maintained | <input type="checkbox"/> | <u>5</u> 0,5 |
| 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> 0,5 |
| B. Information and direction signs | <input type="checkbox"/> | <u>5</u> 0,5 |
| 3. Spreading and Compaction: | | |
| A. Waste spread in uniform layers, generally two feet thick | <input type="checkbox"/> | <u>5</u> 0,5 |
| B. Waste compacted to smallest practical volume | <input type="checkbox"/> | <u>5</u> 0,5 |
| C. Size of working face minimized | <input type="checkbox"/> | <u>5</u> 0,5 |
| 4. Daily Cover: | | |
| A. Compacted, clean earth, 6" 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> 0,5 |
| C. Adequate vector control | <input type="checkbox"/> | <u>5</u> 0,5 |

Compliance Status
Out Points

| | | |
|--|--------------------------|-----------|
| 5. Intermediate Cover: | | |
| A. Compacted, clean earth, 1' thickness (minimum) | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| B. Placed over each portion of any intermediate lift/area following completion of that portion | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| 6. Final Cover: | | |
| A. Final cover applied and certified according to closure plan | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| B. Finished areas vegetated and stabilized per closure plan | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| 7. Grading and Drainage: | | |
| A. Slopes of disposal area sufficient to maximize runoff and minimize erosion (3% to 33% - final grade) | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| B. Surface water run-on and runoff controls provided and maintained | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| 8. Continuity of Operation: | | |
| A. All weather access road to disposal area | <input type="checkbox"/> | 5 |
| 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. Rubbish and Litter Control: | | |
| A. Exposed rubbish and debris (except in designated recovered materials area) | <input type="checkbox"/> | 5 |
| | | <hr/> 0,5 |
| B. Litter control (fencing or other barriers, daily policing) | <input type="checkbox"/> | |
| 10. Fire Protection: | | |
| A. Earth stockpile one day supply within 200' of working face | <input type="checkbox"/> | 5 |
| 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. Waste Requiring Special Handling: | | |
| A. Recovered materials area maintained | <input type="checkbox"/> | 5 |
| 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

100

Location of current operation:

Estimated site life remaining:

8.92 yrs MSWL

| Phase | Area/Trench/Cell | MSW Cell 14 | 25.2 yrs C&D |
|-------|------------------|-------------|--------------|
| | | | C&D Cell 3A |

Time of inspection: 9:45 a.m. p.m. Weather Conditions: sunny

Reason for inspection: Routine Other

Discussed with:

| Name | Title | Address | Telephone |
|------------|-------|--|-----------|
| Trey Allen | | 8880 Old Federal Rd. Ball Ground, GA 30107 | |
| | | | |
| | | | |
| | | | |
| | | | |

Copy of this report submitted to:

| Name | Title | Address | Telephone |
|------------|-------|--|-----------|
| Trey Allen | | 8880 Old Federal Rd. Ball Ground, GA 30107 | |
| | | | |
| | | | |
| | | | |
| | | | |

EPD Solid Waste Management

Photographs: Yes No Location _____

Inspector: Jason Rogers

Reviewer: Kevin Dellmiser Review Date: 7-11-18

Attachments: _____

Facility Operating Record

| Compliance Status | | | | |
|----------------------|----|-----|-----|--|
| Director Notified | In | Out | N/A | |

A. Location Restrictions

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

B. Procedures for Excluding Prohibited Waste

- | | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| 1. Written procedures for random inspections | | | | |
| a. Within 7 days, levels detected and steps taken to protect human health | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Within 60 days, implementation of remediation plan and Director notified | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Inspection records | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Personnel records of training | <input checked="" 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 checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

C. Gas Monitoring

- | | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| 1. Quarterly monitoring results | | | | |
| a. Within 7 days, levels detected and steps taken to protect human health | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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"/> |
| 2. If methane exceeds limits provide written record | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

D. Liquid Waste Restrictions

- | | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| 1. Liquid waste prohibited | | | | |
| a. Within 7 days, levels detected and steps taken to protect human health | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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"/> |
| 2. Liner and leachate collection system | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Gas condensate management | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Leachate management records | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

E. Groundwater Monitoring

- | | | | | |
|--|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| 1. Approved plan | | | | |
| a. Within 7 days, levels detected and steps taken to protect human health | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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"/> |
| 2. Certification of installation | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Monitoring reports | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

F. Closure and Post Closure Criteria

1. Closure Criteria

- a. Approved plan
- b. Notice of final closure
- c. Copy of deed to include:
 - 1. Notice of landfill operation
 - 2. Legal description location
 - 3. Type of waste deposited
- d. Confirmation (written) of b & c recorded on deed
- e. Signed compliance certification by GA P.E.

2. Post Closure Criteria

- a. Approved plan
- b. Results of all monitoring activities
- c. Notice to Director within 5 days of exceedance of standards
- d. Remediation plan within 30 days
- e. copy of written approval for removal of any contaminated material

G. Financial Assurance

- 1. Written cost estimates
- 2. Copy of financial instrument
- 3. Written justification for reduction in cost of reimbursements paid out
- 4. Notice to Director for any of the above necessary

H. Measuring and Reporting Requirements

- 1. Quarterly tonnage reports
- 2. Annual remaining capacity reports
- 3. Annual tonnage fees
- 4. Compliance evaluation reports

Comments or Discrepancies Noted:

EPD continues to receive many odor complaints about Eagle Point Landfill.

EPD is also working with Eagle Point Landfill regarding slope stability issues in response to a recent surface anomaly event.
