



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

Mr. Danny L. Reid
Greenleaf Landfill, LLC.
5665 Hwy 9, Suite 103-205
Alpharetta, Georgia 30004

JAN 13 2021

Re: Routine Inspection
Greenleaf Landfill
Permit No. 058-013D(C&D)
Forsyth County

Dear Mr. Reid:

On December 7, 2020, a routine inspection of the above referenced facility was conducted to determine compliance with the Rules for Solid Waste Management and the permit. The deficiencies and/or violations noted during the inspection are listed below.

- Size of working face needs to be minimized. (Working face of landfill currently utilized as an unpermitted transfer station where waste is being received and then picked up for transport to another regulated facility.)
- Working face of landfill is not being utilized as required in the D&O with regard to proper cover requirements for exposed waste.
- Exposed litter on covered slopes needs to be cleaned up.

Within thirty (30) days of receipt of this letter, please submit a response on how the deficiency noted above will be corrected. The inspection report is attached for your review and is to be placed in your facility's operating file. If you have any questions, then please contact me at (770) 387-4900.

Sincerely,

Jason Rogers
Environmental Compliance Specialist
Mountain District Office

Enclosure:

Evaluation Report

CC: EPD Solid Waste Management Suite 104

Mr. Sam Buckles
Environmental Manager
Forsyth Co. Solid Waste
1950 Sharon Road
Cumming, Georgia 30041



County: Forsyth
 Date: 7-Dec-20
 Permit #: 058-13D(C&D)

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

Municipal Solid Waste Evaluation Report

Facility Name: Greenleaf Recycling Landfill

Compliance Status and Schedule

Current Status: In Compliance Out of Compliance Schedule Priority _____
 Performance Points = 85 (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 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
	Out
1. Certified Operator	<input type="checkbox"/>
Name: <u>Brian Grizzle</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"/>	5
water monitoring points identified, accessible and in good condition	<input type="checkbox"/>	<u>0,5</u>
2. Leachate control maintained;	<input type="checkbox"/>	5
runoff directed to permanent sediment control impoundment;	<input type="checkbox"/>	<u>0,5</u>
sediment control structures maintained (ponds cleaned, silt fences maintained, etc.)	<input type="checkbox"/>	
B. <u>Air</u>		
1. Dust control on access roads;	<input type="checkbox"/>	5
		<u>0,5</u>
2. Methane gas monitoring data current;	<input type="checkbox"/>	5
methane gas structures maintained	<input type="checkbox"/>	<u>0,5</u>
C. <u>Land</u>		
1. Facility buffers delineated and maintained;	<input type="checkbox"/>	5
facility survey control established and maintained	<input type="checkbox"/>	<u>0,5</u>
2. Disturbed areas, including stockpiles, protected, stabilized, and maintained (exposed for more than three months).	<input type="checkbox"/>	5
		<u>0,5</u>
2. <u>Unloading:</u>		
A. Restricted to working face or immediate vicinity	<input type="checkbox"/>	5
B. Information and direction signs	<input type="checkbox"/>	<u>0,5</u>
3. <u>Spreading and Compaction:</u>		
A. Waste spread in uniform layers, generally two feet thick	<input type="checkbox"/>	0
B. Waste compacted to smallest practical volume	<input checked="" type="checkbox"/>	<u>0,5</u>
C. Size of working face minimized	<input checked="" type="checkbox"/>	
4. <u>Daily Cover:</u>		
A. Compacted, clean earth, 6" thickness (minimum); or alternate cover applied in approved manner	<input checked="" type="checkbox"/>	0
		<u>0,5</u>
B. Placed over waste within 24 hours	<input type="checkbox"/>	5
C. Adequate vector control	<input type="checkbox"/>	<u>0,5</u>

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 checked="" type="checkbox"/>	0
			<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

85

Location of current operation:

Estimated site life remaining:

0 years, 140 days

Phase	Area/Trench/Cell	Lift
		3E

Time of inspection: 8:00 a.m. p.m. Weather Conditions: overcast

Reason for inspection: Routine Other

Discussed with:

Name	Title	Address	Telephone
Brian Grizzle		4512 Keith Bridge Road, Cumming, GA 30041	770-888-3355

Copy of this report submitted to:

Name	Title	Address	Telephone
Danny Reid	Owner	5565 Hwy 9, Suite 103-205, Alpharetta, GA 30004	

EPD Solid Waste Management

Photographs: Yes No Location erosion rills, exposed litter

Inspector: Jason Rogers

Reviewer: Kevin Dallmies Review Date: 1-11-21

Attachments: _____

Facility Operating Record

	Compliance Status			
	Director Notified	In	Out	N/A
A. Location Restrictions				
1. Airport Safety				
a. Location Restriction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Bird Hazard	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Flood Plains				
a. 100 year flood not restricted	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Reduction in floodplain will not cause flooding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Landfill adequately protected from washout of solid waste	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Wetlands				
a. USCOE jurisdictional determination made	<input 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 checked="" type="checkbox"/>
4. Seismic Impact Zones (new and lateral expansions)	<input 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Certification of structural integrity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Gas condensate management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Leachate management records	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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
- 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:

Size of working face needs to be minimized. (Working face of landfill currently utilized as an unpermitted transfer station where waste is being received and then picked up for transport to another regulated facility.)

Working face of landfill is not being utilized as required in the D&O with regard to proper cover requirements for exposed waste.

Exposed litter on slopes needs to be covered.

Inspection Date: December 7, 2020

Type of Inspection: Routine Inspection of Greenleaf Recycling Landfill #058-13D (C&D)
Inspector Name: Jason Rogers
Facility Name: Greenleaf Recycling Landfill #058-13D (C&D)
Location (Adjacent): 4512 Keith Bridge Road, Cumming, GA 30041(Forsyth County)
Facility Contact: Brian Grizzle
Contact Phone No.: 770-888-3355

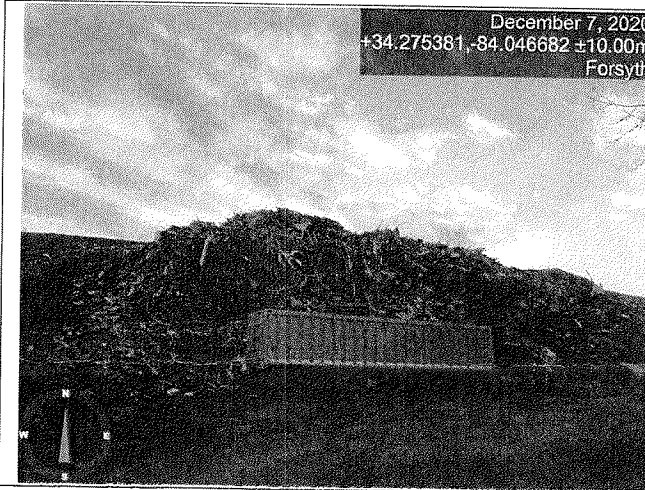


Photo Number: 1 of 4
Date: 12/7/2020 **Time:** 8:00 a.m. **Weather:** overcast
Location: Greenleaf Recycling Landfill
County: Forsyth **Photographer:** Jason Rogers
Observations: Size of workface needs to be minimized

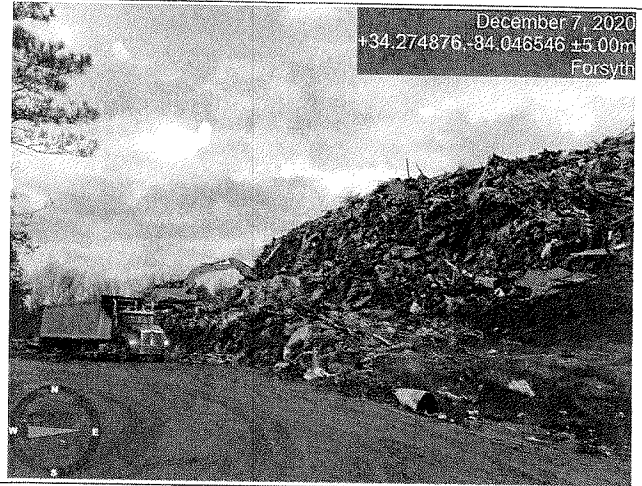


Photo Number: 2 of 4
Date: 12/7/2020 **Time:** 8:00 a.m. **Weather:** overcast
Location: Greenleaf Recycling Landfill
County: Forsyth **Photographer:** Jason Rogers
Observations: Landfill not functioning in accordance with permit. C&D material being brought into landfill, transferred into trucks, and taken to another facility.

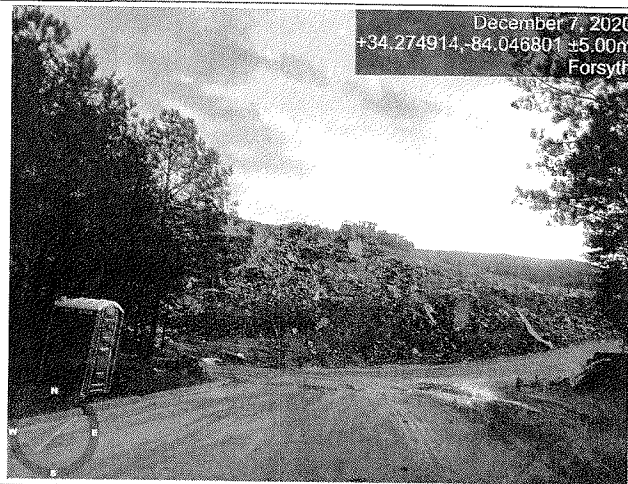


Photo Number: 3 of 4
Date: 12/7/2020 **Time:** 8:00 a.m. **Weather:** overcast
Location: Greenleaf Recycling Landfill
County: Forsyth **Photographer:** Jason Rogers
Observations: Landfill not functioning in accordance with permit. C&D material being brought into landfill, transferred into trucks, and taken to another facility.



Photo Number: 4 of 4
Date: 12/7/2020 **Time:** 8:00 a.m. **Weather:** overcast
Location: Greenleaf Recycling Landfill
County: Forsyth **Photographer:** Jason Rogers
Observations: Exposed litter on landfill area outside of working face.