



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

February 28, 2017

Clinton County Area Solid Waste Agency
Attn: Brad Seward
P.O. Box 996
Clinton, IA 52732

Notice of Violation: Litter Control - 567 IAC 113.8(3)f

Subject: Clinton County Sanitary Landfill Inspection
Facility No: 23-SDP-01-74P

Dear Mr. Seward:

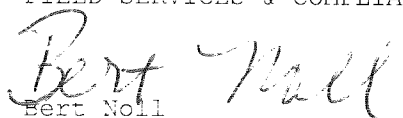
On February 16, 2017 I met with you to investigate complaint #23937 alleging excessive litter and lack of daily cover as well as to conduct a routine compliance visit of the Clinton County Sanitary Landfill. Please review the enclosed report which outlines various items discussed and observed during the course of this inspection.

A notice of violation is being issued for failure to comply with the litter control requirements outlined in 567 IAC 113.8(3)f, which states: *All windblown litter off site of the facility shall be collected daily unless prevented by unsafe working conditions. On-site litter shall be collected daily unless prevented by working conditions.*

Windblown on-site litter was excessive at the time of this visit and actions should be taken immediately to improve litter conditions

If you have any questions, need assistance, or would like further explanation of any part of this report, please contact me at this office at 319-653-2135.

Sincerely,
FIELD SERVICES & COMPLIANCE BUREAU


Bert Noll
Environmental Specialist

Encl. SDP Visit Report

N:\FO6\bnoll\SW\Clinton SDP complaint\visit 2/16/17
Pictures:N:\FO6\PICTURES\Clinton SDP 2-17

xc: Emailed to Becky Jolly, IDNR Solid Waste
Clinton County Sanitary Landfill File

IOWA DEPARTMENT OF NATURAL RESOURCES

Field Office 6
1023 West Madison, Washington, IA 52353
319-653-2135
Sanitary Landfill Visit

Permit #: 23-SDP-01-74

Date this Visit: 2/16/17

Previous Visit Date: 11/2/16

Facility: Clinton East SDP

Weather Conditions at Time of Visit: 45°, Cloudy, Windy

Person(s) Contacted: Brad Seward

Were deficiencies noted or significant observations made during this inspection?

Yes – See Comments Sec., No – No deficiencies noted, Blank – Not applicable or observed, PND – Previously Noted Deficiency

Observations

Yes	No	PND	Item	Yes	No	PND	Item
☒	☐	☐	1. Fill Cover: daily; intermediate; final	☐	☒	☐	10. Special Waste Handling
☐	☒	☐	2. Control of Face: slope; width; location	☐	☒	☐	11. Recycling Activities
☐	☒	☐	3. Compaction	☐	☒	☐	12. Operator Certification
☐	☒	☐	4. Cover erosion; Ponding	☐	☒	☐	13. Staffing
☐	☒	☐	5. Drainage into fill	☐	☒	☐	14. Equipment Backup/Maintenance
☐	☒	☐	6. Leachate Mgmt. & Control	☐	☒	☐	15. Interior Roads
☒	☐	☐	7. Litter	☐	☒	☐	16. Perimeter fence, gate, signs, mon. wells
☐	☒	☐	8. Wet Weather Area	☒	☐		17. Photos taken
☐	☒	☐	9. Construction & Demolition Area	☒	☐		18. Follow-up needed

Comments:

On February 16, 2017 I met with Brad Seward to address a recent complaint about excessive litter at the landfill in addition to conducting a general compliance visit.

Concerning complaint #23937, which was received by our office on 2/13/17 alleging wind blown litter accumulating on and off site, much of the same litter in the pictures provided was observed at the time of this visit 2/16/17. The complaint indicated that the previous day was very windy, as it was the day of my visit, but the complaint believed the accumulated litter had not been just from the day before as it also appeared to be the day of my visit. Mr. Seward explained that the litter was excessive but that it had been very windy as of late and that it had been difficult to find help to pick litter. In any case, despite windy conditions and lack of help, at the time of this visit on site wind blown litter was quite excessive. As previously noted, 567 IAC 117 requires that both on and off site litter be picked daily and record should be made if conditions do not allow.

The complaint also alleged that the landfill has not been covering waste at the end of each working day. Because my visit was in the middle of the day I could not determine if this was the case. However, the previous fill area directly to the west of the current working face had been covered but had large amounts of exposed litter. According to landfill staff this area was to be re-covered in the near future. In any case be reminded that 567 IAC 113 requires that six inches of daily cover or approved material shall be placed and maintained over waste in the active portion at the end of each operating day.

In summary wind blown litter was excessive at the time of this visit as well as when the complaint was taken. This has also been a re-curing issue over many previous visits. Improvement in picking daily litter is expected at the time of the next visit.

The remainder of landfill operations at the time of this visit appeared to be normal and in compliance.

AUTHENTICATION

INSPECTOR: Bert Noll

REVIEWER: Kurt Levetzow

Bert Noll 2/28/17
Kurt Levetzow 3/2/17