



AUGUST 7, 2019

LOESS HILLS REGIONAL SANITARY LANDFILL
ATTN: JUSTIN FRANKS
59722 290th STREET
MALVERN, IA 51551

Letter of Noncompliance: 567 IAC 113.8(2) Daily Cover Requirements

Subject: Loess Hills Regional Sanitary Landfill Inspection & Complaint Investigation
(Complaint No. 27041)
Permit No. 65-SDP-01-72, Mills County
Staff Action No. 137017 & 133899

Dear Mr. Franks:

On July 8, 2019, the Iowa Department of Natural Resources (DNR) received a complaint against the Loess Hills Regional Sanitary Landfill. The complainant was concerned with odor and windblown trash at the facility. On July 18, 2019, I conducted a routine inspection at the facility. The purpose of this letter is to inform you of the outcome of the inspection. A copy of the report of investigation is attached to this letter for your reference. Please pay special attention to the items of non-compliance and requirements noted in the report. In particular, the facility must make sure daily cover requirements are met to ensure compliance with 567 IAC 113.8(2).

You should find the report to be self explanatory; however, if you have any questions, please contact me via telephone at (712) 243-1934 or by email at ryan.young@dnr.iowa.gov.

Sincerely,

Ryan Young
Environmental Specialist
Field Services and Compliance Bureau

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Enclosure: Inspection Report
567 IAC 113.8

CC Becky Jolly & Nina Booker, SW Section (VIA EMAIL)
Herb Handel, Loess Hills Regional Sanitary Landfill (VIA EMAIL)
Complainant (with enclosures)
Loess Hills Landfill File

IOWA DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL SERVICES DIVISION

Field Office #4

1401 Sunnyside Lane, Atlantic, IA 50020

Phone: (712) 243-1934

FAX: (712) 243-6251

REPORT OF INVESTIGATION

INVESTIGATION DATE

CURRENT: 7/18/2019

LAST: 7/19/2017

TO: Loess Hills Regional Sanitary Landfill
59772 290th Street
Malvern, IA 51551

SUBJECT: Loess Hills Regional Sanitary Landfill Routine Inspection and Complaint Investigation
Permit #65-SDP-01-72P

PERSONS CONTACTED: Herb Handel, Landfill Operations Manager (712-624-8039)
Justin Franks, Assistant District Manager (712-624-8039)

OBSERVATIONS:

Permit Review:

- The permit reporting requirements have been submitted by Barker Lemar Engineering, including the spring 2019 semi-annual water quality report, 2018 annual water quality report and the 2019 financial assurance.

On-site observations:

- Upon arrival I met with Mr. Handle and Mr. Franks. We discussed the work that has been done since the previous inspection and proceeded to conduct a visual inspection of the landfill. Mr. Handel and Mr. Franks stated that the facility has been working on cleaning out the storm-water sediment pond and continuing to work on erosion and intermediate landfill cover.



Picture 1: Storm-water Sediment Basin



Picture 2: Storm-water Sediment Basin

During the inspection, we noted erosion along the north side of the haul road. The area had been repaired following my previous inspection; however, erosion continues to occur. Mr. Franks stated that they will be burying an 18 inch tube and adding multiple intakes along the haul road to help stop erosion along the road. It was noted that the facility needed to repair several areas of channelization above the haul road (on the south facing slope) as well. After final dirt work is completed, the area should be seeded.

During the inspection, we observed the working face. According to Mr. Handel, the facility received more than twice their normal amount of waste due to the flood cleanup this spring. Mr. Handel stated that the facility was working on adding daily cover to the working face. It was apparent that not all of the working face was being covered each day. It should be noted that previous inspections have noted daily cover requirements. Proper daily cover on the working face helps with both windblown litter and odor control. Mr. Franks stated that the

contractors working on the new cell have been able to haul cover dirt up to the working face, which has allowed facility staff to work more on daily and intermediate cover (see pictures 3 and 4).



Picture 3: New cell and cover work in background



Picture 4: Contractors for new cell

I did not document any litter offsite during my inspection. The facility has been using trash screens to control windblown litter at the working face. Mr. Franks went on to say that the facility has ordered 7 additional wind screens and has budgeted for 10 more. We also discussed the possibility of adding a perimeter fence to help catch any windblown litter.

While the purpose of the visit was to determine compliance with the municipal solid waste landfill rules and regulations, we also discussed storm-water compliance at the facility. As a reminder, the facility is currently covered under storm-water General Permit #1. The facility must comply with all requirements of the storm-water permit, including, but not limited to, storm-water controls, storm-water pollution prevention plan requirements (SWPPP), sampling requirements, inspection requirements and record keeping requirements. It is recommended that the sediment retention pond be cleaned to prevent a discharge of sediment into a water of the state.

Complaint Investigation:

During the inspection, we discussed a recent complaint (No. 27041) that our office had received. The complainant stated that the odor from the landfill was "horrible" and that there was trash blowing around. Mr. Handel stated that the facility has three employees on the payroll that are in charge of litter pickup. He went on to say that while the landfill requires all loads to be covered, they were noticing that some of the trucks bringing in waste from the flood cleanup were not being covered. I explained to Mr. Handel and Mr. Franks that the facility should be enforcing their in house rule for having loads covered. It was noted that while there are no odor regulations, proper use of daily cover helps to reduce any odor at the landfill.

Conclusion:


During the inspection, one item of non-compliance was noted. In accordance with 567 Iowa Administrative Code (IAC) Chapter 113.8(2)"f", six inches of cover material or an approved depth or application of alternative cover material shall be placed and maintained over waste in the active portion at the end of each operating day, or at more frequent intervals if necessary. The facility has done significant work to repair the previously noted erosion and items of non-compliance.

Requirements:

- Daily cover or an approved alternative daily cover requirements must be met per 567 IAC Chapter 113.8(2)"f"
- Continue to add intermediate cover where required.
- The facility must control dust on the landfill property.
- The facility must abide by all requirements in the Operation Permit.
- The facility must abide by all requirements in the General Permit #1 (storm-water) including developing and maintaining a SWPPP.

Recommendations:

- It is recommended that the facility re-grade and re-seed rill erosion throughout landfill where needed.

AUTHENTICATION	
INSPECTOR: 	DATE: 8/7/19
REVIEWER: Holly Vandemark Copy of Record	DATE: 8-8-19