



OCTOBER 19 2020

ADAIR COUNTY SANITARY LANDFILL
ATTN KURT REASON
1645 STATE HIGHWAY 25
MENLO, IA 50164

Subject: Adair County Sanitary Landfill Visit, Permit No. 01-SDP-01-74, Adair County

Dear Mr. Reason:

On May 29, 2020, I made a visit to the Adair County Landfill to perform a routine inspection of the closed landfill. Upon arrival it was noted that the leachate levels were very low and the facility was actively pumping water from a nearby creek into the lagoon. Please see the attached report of investigation for the details of the investigation. The purpose of this letter is to inform the facility of the rules and regulations related to landfill leachate releases and landfill operation.

In accordance with 567 Iowa Administrative Code (IAC) Chapter 131, *“any person manufacturing, storing, handling, transporting, or disposing of a hazardous substance shall notify the department at (515)281-8694 and the local police department or the office of the sheriff of the affected county of the occurrence of a hazardous condition as soon as possible but not later than six hours after the onset of the hazardous condition or discovery of the hazardous condition”*. In addition to the verbal report, a written report of the hazardous condition must be submitted within 30 days of the verbal report. The release of leachate into a surface would constitute a hazardous condition.

A documented release of landfill leachate would be a violation of 567 IAC Chapter 61.3. The general water quality criteria state in part the following criteria are applicable to all surface waters including general use and designated use waters, at all places and at all times for the uses described in 61.3(1)“a.”

- a. Such waters shall be free from substances attributable to point source wastewater discharges that will settle to form sludge deposits.
- b. Such waters shall be free from floating debris, oil, grease, scum and other floating materials attributable to wastewater discharges or agricultural practices in amounts sufficient to create a nuisance.
- c. Such waters shall be free from materials attributable to wastewater discharges or agricultural practices producing objectionable color, odor or other aesthetically objectionable conditions.
- d. Such waters shall be free from substances attributable to wastewater discharges or agricultural practices in concentrations or combinations which are acutely toxic to human, animal, or plant life.

e. Such waters shall be free from substances, attributable to wastewater discharges or agricultural practices, in quantities which would produce undesirable or nuisance aquatic life

During the scope of this investigation, the department was not able to document a release of landfill leachate from the lagoon valve. Please note that if the release were to have been documented, notification to the department would have been required. Additionally, further legal enforcement action (including monetary penalties) against both the landfill and the operator in charge may have occurred.

Based off of observations noted during this investigation, the Adair Sanitary Landfill is required to submit a copy of its Emergency Response and Remedial Action Plan (ERRAP) **by November 1, 2020**. It is strongly recommended that the landfill educate all current and future employees about the importance of the ERRAP document.

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: Report of Investigation
567 IAC Chapter 61.3
567 IAC Chapter 131

CC Becky Jolly, SW Section (VIA EMAIL)
Mike Smith, SW Section (VIA EMAIL)
Adair County Board of Supervisors, 400 Public Square Ste. 5, Greenfield, IA 50849
Facility File

SUSPENSE: November 1, 2020; Submit copy of ERRAP (567 IAC Chapter 106)

DEPARTMENT OF NATURAL RESOURCES
Environmental Services Division

MEMORANDUM

DATE: October 16, 2020

TO: Adair County Sanitary Landfill File

FROM: Ryan Young, IDNR Environmental Specialist *RY*

RE: Adair County Sanitary Landfill Visit
Permit No. 01-SDP-01-74, Adair County

On May 29, 2020, I made a visit to the Adair County Landfill to perform a routine inspection of the closed landfill. Upon arrival I met with Duane Eilts and Quinton Schultz and notified them of the purpose of my visit. During the visit, it was noted that the leachate lagoon was at a very low level and upon further investigation, it was observed that the facility was actively pumping water from the nearby creek into the lagoon. Mr. Eilts and Mr. Schultz both stated that they didn't know anything about the pump and stated that Delmar Frisbie (Landfill Operator) was off for the day. Prior to leaving I instructed Mr. Eilts and Mr. Schultz that the pump should be shut off immediately and they should have Mr. Frisbie to contact me. After leaving the landfill I went downstream of the landfill to check for any signs of dead fish and/or leachate pools. I did not find any evidence of a release.



Photo 1: Pumping into Lagoon



Photo 2: Pumping from Stream

On June 4, 2020, I spoke with Mr. Frisbie about my observations noted above. Mr. Frisbie stated that the facility had transported 3 loads of leachate to the City of Greenfield for disposal on May 21, 2020. He went on to say that on May 28, 2020, the facility noticed that the lagoon was

nearly empty. Mr. Frisbie stated that they began to pump water back into the lagoon in an effort "to check for leaks". When asked if a valve could have been left open, Mr. Frisbie stated he didn't know. Mr. Frisbie stated that he did not contact this office or the facilities' consulting engineer (SCS Engineers).

On July 1, 2020, I conducted a follow up visit at the facility. Mr. Frisbie stated that they were now working with SCS Engineers to determine if the leachate lagoon was leaking. He also stated that the pump was removed following my initial visit.

Based on the observations noted above, it is believed that the valve may have been accidentally been left open on May 21, 2020; however, facility staff would not admit to leaving it open, and, I did not document any evidence of the leachate being released. It should be noted that there were 8 days between when Mr. Frisbie stated that last loads were hauled to Greenfield and my initial visit. It should also be noted, that during the span of this investigation, Mr. Frisbie and Mr. Eilts have retired and Mr. Schultz was reportedly fired from the facility.