

July 3, 2024

CLINTON COUNTY AREA SOLID WASTE AGENCY
ATTN BRAD SEWARD
P.O. BOX 996
CLINTON, IA 52732

SUBJECT: Landfill Visit; FOCD Staff Action #176377
SDP Permit #23-SDP-01-74; Clinton East SDP, Clinton County IA

Dear Mr. Seward:

On June 28, 2024 I completed a visit to the Clinton County Landfill. I met with you and we observed and discussed current landfill status. The enclosed report outlines various items assessed during the course of my visit.

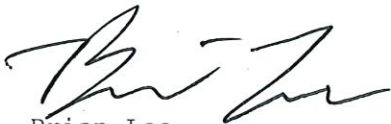
The facility must work with their operator and/or engineer to effectively manage leachate at the current working face. Along a majority of the toe of the slope of the active working face, no leachate control measure was in place. Storm water that contacts the working face must be treated as leachate and not allowed to discharge with storm water. Furthermore, the facility must clearly identify the western limits/boundary of the current cell. Please provide an update to this office by **July 17, 2024** regarding how these issues will be addressed.

Furthermore, the facility is reminded of the special handling of asbestos containing material (ACM). Please reference the attached rules regarding ACM recordkeeping.

If you have any questions or would like further explanation of any part of this report, please contact me at this office at 319-653-2135 or at brian.lee@dnr.iowa.gov.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU



Brian Lee
Environmental Specialist

Encl. SDP Visit Report, ACM rules 567-109.11

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xc: Becky Jolly, IDNR Solid Waste Section, via email
FOCD: Clinton SDP East #23-SDP-01-74

Suspense: July 17, 2024

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:** 6/28/24 **Previous Visit Date:** 6/7/24 (ADP)

Facility Name: Clinton East SDP **Weather Conditions at Time of Visit:** 65 deg F, Overcast, Wind: ESE 5-10 mph

Person(s) Contacted: Brad Seward – Landfill Manager

Were deficiencies noted or significant observations made during this visit?

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
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1. Fill Cover: daily; intermediate; final	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10. Special Waste Handling
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2. Control of Face: slope; width; location	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	11. Recycling Activities
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	3. Compaction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	12. Operator Certification
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4. Cover erosion; Ponding	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	13. Staffing
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5. Drainage into fill	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	14. Equipment Backup/Maintenance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6. Leachate Mgmt. & Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	15. Interior Roads
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7. Litter	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	16. Perimeter fence, gate, signs, mon. wells
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	8. Wet Weather Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>		17. Photos taken
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	9. Construction & Demolition Area	<input type="checkbox"/>	<input checked="" type="checkbox"/>		18. Follow-up needed

Comments: I met with Brad Seward and we initially reviewed the public drop off and recycling areas south of the main office. Numerous appliances were stored ready to be demanufactured. Many were not under roof, but none appeared to be leaking or posed an immediate threat to storm water runoff. Mr. Jason Bahnsen continues to demanufacture appliances as time allows, with the bulk of appliance demanufacturing taking place in the winter. The passenger tire pile appeared to contain about 500 tire equivalents. Larger tires were separated from passenger tires. Liberty Tire reportedly has been contacted to haul out another load for recycling. No issues were determined with the fill area/material, landscape waste area, or the public drop off area. A camera system in in place at the scale and the public drop off area and is used to track drivers and/or prohibited waste. Some guidelines/info is spray painted on the walls of the public drop off containment area. Installing standard signage, that is clearly visible and can't be covered up, is recommended.

The closed area to the north appeared to have a uniform vegetative cover. A few trees were observed on the eastern side, near the terraced area. The facility is reminded to eliminate any trees over waste in this closed area. Any erosion issues on the cover should also be addressed. Mowing the area at least once a year is recommended. A new mowing contractor is planned to be hired. Gas capture piping is planned to be installed in the closed area in the near future. SCS submitted the semi-annual reports on time as required for 2023 and so far in 2024. An interceptor trench for leachate has been approved and is anticipated to be installed on the southeast portion of the closed cell in the near future (this year). No issues were detected with the current leachate collection system or lagoon. No seeps were observed in the closed area or active cell.

The working face was located towards the west/southwest portion of the site in Phase 2 on a west facing slope. Landscape mulch and auto shredder residue (ASR) was utilized as road base. ASR was stockpiled for daily cover. Access and space at the working face appeared adequate under normal conditions and for times of wet weather. Some foundry sand was located near the working face for cover use as well. A tarp was available on a spool for cover. Litter fences were located near the working face. Minor litter was observed immediately southeast and north/northeast of the working face. No other significant litter accumulation was observed on site. No off-site litter was observed.

The working face slope was rather steep. The compactor had slight trouble traversing the slope, but was able to slowly back up the hill. Compaction appeared adequate, but some waste on the southern portion appeared to not have been completely compacted yet (possibly new waste added the day of my visit). No ASR or sand cover was observed, but this area may have been covered by the tarp for daily cover. At the bottom/toe of the slope, industrial tires were in a line to act as a barrier for the end of the cell. The corner of the cell was marked up the slope to the south with a yellow post, but it was unclear where the edge of the cell was in relation to the tires. Furthermore, ineffective controls were beyond the toe to prevent storm water that contacts the working face waste (now leachate) from running off to the storm water conveyance to the west/southwest. A small berm was in place towards the southwest corner, but a majority of the toe was uncontrolled. Storm water was pooled just beyond the toe/tires, presumably off the working face, near the start of the storm water conveyance. The facility must keep leachate out of storm water. Additional action is needed in this area. See picture on page 2.

INSPECTOR:

Brian Lee, Environmental Specialist



7/3/24

REVIEWER:

Ryan Stouder Environmental Program Senior



07/03/2024



Picture 1. Looking west/northwest from the top of the active working face. No controls are in place across a majority of the toe for storm water that contacts the working face. The edge of the cell is unclear. The ponding in the central portion appears to be off the cell. If the ponding is over the current cell, the ponding will need eliminated.

567—109.11(455B,455D) Conditions and requirements for the disposal of general special wastes.

109.11(1) Asbestos-containing material. The sanitary landfill permit holder shall comply with the following conditions and requirements whenever asbestos-containing waste materials are accepted and disposed of in a sanitary landfill.

a. Asbestos-containing material (ACM) wastes with 1 percent or less asbestos are not regulated and can be disposed of at the working face, the same as any other waste.

b. ACM wastes that contain greater than 1 percent asbestos are regulated under federal asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) and shall be managed in accordance with federal regulations defined in 40 CFR Part 61, Subpart M. Testing to determine asbestos content shall utilize the method specified in 40 CFR Part 763, Section 1, Appendix A of Subpart F.

c. Nonfriable ACM waste is defined as waste containing greater than 1 percent asbestos that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure. Nonfriable ACM waste includes asbestos-containing floor covering and asphalt roofing materials that show no evidence that they contain crumbled, pulverized or powdered ACM residues upon delivery to the landfill.

d. Friable ACM waste is defined as waste containing greater than 1 percent asbestos that when dry can be crumbled, pulverized or reduced to powder by hand pressure. Friable ACM waste includes acoustical, thermal and fireproofing insulation, as well as numerous building products with incorporated asbestos material. Waste transite siding shall be considered friable ACM waste.

e. ACM waste transporters should be encouraged by the landfill operator to notify the landfill at least 24 hours in advance when ACM waste will be arriving at the landfill. Upon arrival at the sanitary landfill, the transporter shall present to the landfill operator the ACM waste shipment records, which shall include a determination whether the ACM waste is friable or nonfriable, if known. The landfill operator must through visual inspection or testing verify whether the ACM waste is friable or nonfriable. If not verified as nonfriable, the waste must be handled as friable ACM waste.

f. Any federal NESHAP-regulated ACM waste shipments that show evidence of visible dust emissions or that are not properly containerized, wrapped, wetted, and covered shall be rejected upon arrival at the landfill.

g. ACM wastes with greater than 1 percent asbestos content that are nonfriable when received at the landfill may be disposed of at the working face. Care shall be taken when unloading and covering the waste so that it does not become friable at the working face.

h. ACM wastes with greater than 1 percent asbestos content, as determined by laboratory tests, which are confirmed as friable when received at the landfill shall be disposed of in an area separate from the regular working face. The wastes shall be covered carefully with a minimum of six inches of soil cover and compacted by no later than the end of the operating day. Care shall be taken at all times during disposal and covering to prevent rupture of asbestos-containing containers and wrapped waste systems. Covered ACM waste areas shall be protected from erosion at all times.

i. Upon delivery, friable ACM wastes must be wet and contained in labeled, leak-tight containers or wrapping which prevents asbestos from becoming airborne. Bulk demolition wastes with friable ACM need not be placed in leak-tight containers, but must remain wet at all times and be properly labeled and wrapped to prevent asbestos from becoming airborne during transport and disposal and covering at the landfill.

j. Extreme care shall be taken at all times when transporting, depositing, and covering federal NESHAP-regulated ACM waste to control the evolution of dust and airborne asbestos fibers and to not allow the rupture of asbestos containers and wraps.

k. After landfill acceptance, if any federal NESHAP-regulated ACM waste becomes dry prior to disposal, rewetting, or an approved alternative means of dust emissions control, is mandatory. When disposed of, the wet ACM waste must be properly covered before it can dry again.

l. In the event that any visible dust emissions from federal NESHAP-regulated ACM waste occur, protective safety equipment, consistent with federal NESHAP and OSHA regulations, shall be immediately utilized by landfill operating staff.

m. Daily records of the acceptance and disposal of all ACM wastes shall be maintained. Landfill records for each NESHAP-regulated ACM waste shipment shall include the following:

- (1) The date of ACM waste receipt.
- (2) The names, addresses, and telephone numbers of the originating waste generation site, facility owner, agent responsible for performing removal and the waste transporter.
- (3) The description of ACM wastes, quantity in cubic yards, weight and the number and type of containers or systems received.
- (4) The waste shipment record and any accompanying asbestos content laboratory test and friable status documentation.
- (5) The operational log notation relative to the landfill operator's visual confirmation of waste type compared to waste shipment records and the friable or nonfriable status for each federal NESHAP-regulated ACM waste shipment.
- (6) The operational log notation of any rejected ACM waste and the reasons for rejection by landfill staff.
- (7) The site operational area, coordinates location and vertical elevation keyed to site mapping and the quantity of buried waste in cubic yards for each federal NESHAP-regulated waste shipment disposed of within the disposal site.

n. Records for all federal NESHAP-regulated ACM wastes accepted at the landfill in accordance with 40 CFR Part 61, including required federal and state asbestos NESHAP program operational and site closure reports, shall be maintained. All records, except for waste shipment records, shall be maintained through site closure. Waste shipment records shall be retained for at least two years.

o. A copy of an Affidavit Explanatory of Title which has been file stamped by the county recorder shall be submitted to the department within 60 days of site closure. The affidavit shall appear at part of the property deed record and shall indicate that:

- (1) The landfill has been used for the disposal of ACM waste.
- (2) The survey plot and all records of the location and quantity of regulated ACM wastes have been filed with federal and state NESHAP program officials. Such documentation must be filed with the department, along with the notification.
- (3) The site is subject to the regulations under 40 CFR Part 61, Subpart M, and the site closure permit requirements issued by the department.

p. Strict adherence to federal NESHAP asbestos regulations under 40 CFR Part 61 is mandatory for all federal regulated ACM wastes. Questions on federal and state regulations should be addressed to the U.S. Environmental Protection Agency at (913)551-7391 or the department's air quality bureau at (515)281-8443. Questions regarding state asbestos abatement certification requirements should be addressed to the Iowa division of labor services at (515)281-6768.

109.11(2) *Petroleum-contaminated soil.* The sanitary landfill operator, the generator, and the hauler shall comply with the following conditions and requirements whenever petroleum-contaminated soil is disposed of in a sanitary landfill.

- a.* The waste cannot be a hazardous waste.
- b.* The waste cannot contain free liquids as determined by the paint filter liquids test.
- c.* Upon arrival at the landfill, the hauler shall identify the waste to the landfill attendant.
- d.* The landfill operator shall direct the hauler to the evaporation area. The soil borrow area or an area with intermediate cover may be used.
- e.* The contaminated soil may be spread up to a depth of 4 inches. The contaminated soil shall be allowed to aerate for at least 14 days and until the hydrocarbon level is less than 100 ppm. Fourteen days is a minimum. Longer times may be needed if weather conditions are unfavorable or if contamination levels are unusually high.
- f.* The soil shall be turned or disked at least three times per week.
- g.* Alternative procedures other than those procedures defined in 109.11(2) "e" and 109.11(2) "f" may be used if it can be demonstrated that soil treatment meeting the requirements of 109.11(2) "h" can be consistently achieved and if approved under permit amendment.
- h.* After the contaminant has evaporated and the total hydrocarbon content is less than 100 ppm, the soil may be used as daily cover material or incorporated into the working face. The soil may not be used for capping or lining.