

Santek Environmental Reference Analysis and Report to the Haywood County Solid Waste Committee

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(423 pages counting tabs / some duplicates may exist to substantiate conditions)

Executive Summary

Santek Environmental Reference Analysis

Directive: On 01/26/2011, per the County Manager, Marty Stamey, Marc Pruett began a multi-day telephone and internet inquiry as to the following message from Mr. Stamey: "Research all attachments as part of our due diligences on Santek Environmental with a written report of your findings addressed to the Solid Waste Committee. We are specifically interested in regulatory and environmental compliance, along with contacting all references."

Progress to wit: The attachment included nine (9) state regulatory references and fourteen (14) governmental contacts. Of the 9 state regulatory offices, 7 were contacted, and of the 14 governmental contacts, 12 were contacted plus extended references; as well as one contact (Hardin County, Kentucky) provided a letter of recommendation prior to this analysis. As to the contacts who were not reached, multiple tries were made over several days to no avail.

Analysis: Concurrent with Mr. Pruett's work, Mr. Stephen King has been undergoing study of technical reports submitted by regulatory agencies, local governments, as well as those from Santek. In meetings with Mr. Pruett, Mr. King's expressed opinions as to his analysis of technical reports appear to be intuitive, thorough, and correct. Mr. Pruett began analysis on 01/26/2011 (1/2 day), with full days devoted to this task on 01/27/11, 01/28/11, 02/01/11, and 02/02/11.

Opinion: With regards to the directive in the research of the subject attachments to the referenced e-mail from Mr. Stamey to Mr. Pruett on 01/26/2011, it is the opinion of the author (and it should be obvious from the findings of the report), that Santek Environmental has an excellent record of regulatory and environmental compliance on the many landfills in all the states of reference. In entirety and without exception, all references contacted recommended Santek Environmental in the positive. Attitudes and opinions ranged from dry analytical (yet positive) to several stunning accolades of praise filled with emotional relief at finding and using Santek Environmental. All conditional responses are included in the report for detailed scrutiny. There were no negative recommendations from any contact regarding the use of Santek Environmental. Santek's business model was praised as efficient, comprehensive, well directed, and fitting to the needs of the served communities. There were some "glitch" comments from some of the contacts, but they were referenced in the frame that "all landfills are going to have some trouble", but "Santek gets ahead of the problems early."

Supplements: Several contacts to this study generously provided documents including: Inspection reports from regulators, inspection reports from the regulated community, pictures, NOV's "before" Santek and reports "after", letter of recommendation, engineering compaction analysis, letters in general, e-mails, complete Santek contracts including supplements, and the like.

Recommendation: Carefully scrutinize the entire report, because the many specific details and suggestions by all contacts may bring needed and creative options that can enhance the county's contractual position as well as serving to prevent unnecessary problems.

STATE REGULATORY REFERENCES

Tennessee

Mr. Glen Pugh
Manager, Solid Waste Program
Tennessee Department of Environment and
Conservation
Division of Solid Waste Management
8th Floor, L&C Tower
401 Church Street
Nashville, TN 37243
(615) 532-0445

Mr. Guy Moose
Division of Solid Waste Management
Chattanooga State Office Bldg.
Suite 550
540 McCallie Avenue
Chattanooga, TN 37402
(423) 634-5745

Texas

Mr. Jeff Davis
Team Leader, Waste Permits
Texas Commission on Environmental
Quality
P.O. Box 13087
Austin, TX 78711-3087
(512) 239-6228

Georgia

Mr. Jeff Cown
Program Manager
Department of Natural Resources
Environmental Protection Division
Atlanta Tradeport, Suite 104
4244 International Parkway
Atlanta, GA 30354
(404) 362-2566

Arkansas

Mr. Bryan Leamons
Engineer Supervisor, Solid Waste Division
Arkansas Department of Environmental
Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
(501) 682-0601

Virginia

Mr. Zakaria M. Rabei
Environmental Specialist II
Virginia Department of Environmental
Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193
(703) 583-3800

Alabama

Mr. Jonathan Crosby
Solid Waste Branch - Land Division
Alabama Department of Environmental
Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059
(334) 270-5644

Kentucky

Mr. Scott Gerstner
Environmental Inspector
Kentucky Department for Environmental
Protection
Division of Waste Management
Louisville Regional Office
9116 Leesgate Road
Louisville, KY 40222
(502) 429-7120

Ohio

Mr. John Pasquarette
Environmental Manager
Division of Solid and Infectious Waste
Management
Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 373-3057

Santek Governmental Contact Information

Bradley County, Tennessee

Mr. Gary Davis, County Mayor
(423) 728-7141

Catoosa County, Georgia

Mike Helton, County Administrator
(706) 965-2500

Crawford County, Ohio

Mr. Mo Ressallat, Commissioner
(419) 562-5876

Crittenden County, Arkansas

Mr. Milton Holt, County Judge
(870) 739-3200

Gordon County, Georgia

Mr. Randall Dowling, County Administrator
(706) 629-3795

Hardin County, Kentucky

Mr. Harry Berry, Judge Executive
(270) 765-2350

Jefferson County, Alabama

David Carrington, Commission President
(205) 325-5503

Loudon County, Tennessee

Mr. Steve Field, Chairman
(865) 576-1057

Louisa County, Virginia

Mr. Richard Havasy, Commission Vice Chair
(540) 894-1023

Murray County, Georgia

Mr. David Ridley, Sole Commissioner
(706) 517-1400 ext. 277

Polk County, Texas

Mr. John Thompson, County Judge
(936) 327-6813

Rhea County, Tennessee

Mr. Ronnie Raper, Chairman
(423) 775-2724

Wake County, North Carolina*

Mr. Johnny Beale, Solid Waste Specialist
(919) 291-7322

Alamance County, North Carolina*

Mr. Greg Thomas, Solid Waste Director
(336) 264-6700

* No Longer Managing Facilities

Report to Haywood County Solid Waste Committee

(Prepared by Marc Pruett, CPESC/Director of Haywood County Erosion Control Program)

(01/26/2011 Directive to Mr. Pruett from Marty Stamey, Haywood County Manager)

“... research all attachments as part of our due diligences on Santek Environmental with a written report of your findings addressed to the Solid Waste Committee. We are specifically interested in regulatory and environmental compliance, along with contacting all references. This is a critical component...”

Approach to calls: I basically asked each contact for any information they could provide Haywood County with regards to their respective dealings with the Santek Company. They received a synopsis of our desire to explore options with the White Oak Landfill, and I specifically asked each person about Santek's record of operations, environmental concerns including record-keeping such as NPDES logs, and requested any information they would offer regarding Santek's operations dealing with regulatory compliance. The information provided herein is stated solely based upon each individual's personal statements.

(First contact)

Tennessee

Mr. Glen Pugh

Manager, Solid Waste Program

Tennessee Department of Environment and Conservation

Division of Solid Waste Management

8th Floor, L&C Tower

401 Church Street

Nashville, TN 37243

(615) 532-0445

Mr. Pugh was contacted on 01/26/11. He has been with the regulatory program since 1981. He said he has known of and observed the Santek Company's work for this entire time (20 years). He has a long track-record with the company, and he said Santek has done a "good enough job" to expand over the years. Mr. Pugh generalized by saying (paraphrased), "...is familiar with them...they have a unique plan of not owning landfill operations...they have developed expertise in running landfill's...and they have been very responsive with regards to requests by the regulatory program in Tennessee."

Santek runs four (4) Tennessee facilities...and on "the compliance side"...they are "pretty good". Mr. Pugh said Santek had one "bad incident" in Loudon, TN. This was a "garbage slide" that was a failure connected with industrial waste that was a "sludge problem of unusual content". This is a Class 1 landfill and the incident is still under investigation, and he indicated there may have been unknown or unexpected characteristics of the sludge that led to this failure. Specifically, eighty (80) cubic yards of material moved/slid off the approved footprint and terminated in a ditch in an adjacent cell. There was no liner damage, but the incident will likely change some procedures there. I got the impression from him that the characteristics of this particular industrial sludge may have been somewhat an unknown factor to his office as well as to Santek. Again, the incident is still under investigation.

Mr. Pugh gave me a web page to view compliance documents, and he indicated there may be some specific reports to Santek work in Tennessee. It is: www.state.tn.us/environment/
This appears to be a very comprehensive site and may take some time to find relevant documents.

Mr. Pugh said he thought all Santek contracts are given an "upper limit on the volume of waste" a site can receive, and he would recommend that as a condition of a contract. Specific to this, he said there was a landfill in Ray County, TN near Dayton run by Santek that had been bringing in sewage material from Chattanooga. There was so much volume brought in that the site was "overwhelmed." He said there had been leachate problems and quantities had to be restricted at that location. He reiterated... "a waste cap is needed."

(Second contact)

Georgia

Mr. Jeff Cown
Program Manager
Department of Natural Resources
Environmental Protection Division
Atlanta Tradeport, Suite 104
4244 International Parkway
Atlanta, GA 30354
(404) 362-2566

Mr. Cown was contacted on 01/26/11. He is the permitting manager and has observed some construction by Santek over a 5-6 year period. With regards to operating permits for landfills in Georgia, he said Santek does "good" work. He indicated that the main permit for operation is obtained by the county...and Santek is under contract for daily operations.

He was not familiar with NPDES requirements and referred me to the District Offices of Jamie Lancaster, Larry Castleberry, and Tony Campbell at; 770-387-4900. This day, Lancaster and Castleberry were out-of-office attending a workshop...and Mr. Campbell was in the field when I called for him.

(Third contact)

Virginia

Mr. Zakaria M. Rabei
Environmental Specialist II
Virginia Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193
(703) 583-3800

Mr. Rabei was contacted on 01/26/11, and indicated he has had experience with the Santek Company on one landfill in Virginia for approximately six (6) months as of this date. He said it is in Louisa County, and he did not know the age of the landfill. Mr. Rabei told me "the landfill was a mess before" Santek came in...and that the site is "better" now. He said he has had a "good experience" in his dealings with the Santek people. He said he tries to inspect quarterly to bi-monthly...and his two inspections so far indicated the landfill "looked good."

Mr. Rabei was not aware of what the NPDES permit requires, and he referred me to the county people at the landfill...Mr. Kevin Linharis at 540-967-3478 and Robert Carter at 540-967-3462. Mr. Rabei said the operating permit is issued to the county. He said he will send us inspection reports and a Notice of Violations (from some time back).

Note: Mr. Rabei was very helpful in sending the following documents to me on the same day of our conversation.

Hello Marc,

Attached are copies of the last three inspection reports for the compliance inspections conducted at Louisa County landfill. SanteK Environmental Inc. started managing the site late August 2010, so they were not responsible for the August 10, 2010 NOV.

Please don't hesitate to contact me if you have any question regarding this matter.

Zakaria M. Rabei
Environmental Specialist II
Virginia Dept. of Environmental Quality
Ph: (703) 583-3868
Fx: (703) 583-3821
zakaria.rabei@deq.virginia.gov



Photo 1. Exposed waste at the northeastern side of the landfill.



Photo 2. Exposed waste at the northeastern side of the Landfill.

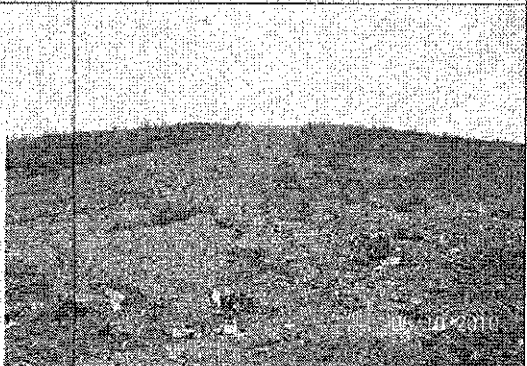


Photo 3. Bare areas and exposed waste at the eastern side slope of the landfill.

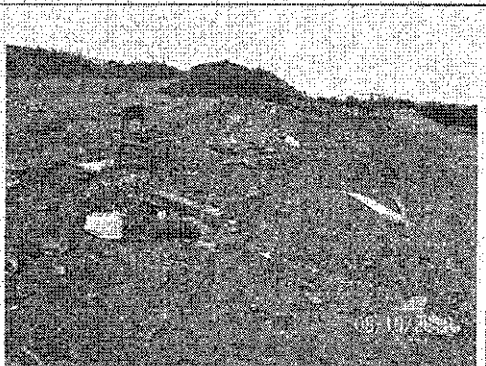


Photo 4. Exposed waste at the eastern side of the landfill.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193

(703) 583-3800 Fax (703) 583-3821

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

Darwin K. Paylor
Director

Thomas A. Faha
Regional Director

September 9, 2010

Mr. Kevin S. Linhares, Director
Louisa County Department of Facilities Management
P.O. Box 1980
105 Woolfolk Avenue
Louisa, VA 23093

Notice of Violation

**Re: Louisa County Sanitary Landfill – SWP No. 194
Compliance Inspection on August 10, 2010**

Dear Mr. Linhares:

The Department of Environmental Quality (“DEQ” or “the Department”), Northern Regional Office (NRO) has reason to believe that the Louisa County Landfill may be in violation of the Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-80-10 *et seq.*) and/or the Virginia Financial Assurance Regulations (9 VAC 20-70-10 *et seq.*).

This letter addresses conditions at the facility named above, and also cites compliance requirements of the Waste Management Law and Regulations. Pursuant to VA Code 10.1-1455 (G), this letter is not a case decision under the Virginia Administrative Process Act, VA Code 2.2-4000 *et seq.*

Observations and Legal Requirements

On August 10, 2010, Zakaria Rabet and Joseph Trocchio of the DEQ conducted an inspection at the Louisa County Landfill. A copy of the inspection report is attached. The following describes the staff's factual observations and identifies the applicable law and regulations:

1. **Observations:** During the inspection the DEQ observed exposed waste on the northern and eastern sides of the landfill along with erosion rills and areas lacking proper vegetative cover along the eastern, western and northern slopes (Photos 1-8). The exposed waste appears to be from the lack of sufficient cover and the erosion from improperly compacted cover material. The lack of vegetative cover appears to be the result of an insufficient support layer.

Legal Requirements 2: The Virginia Solid Waste Management Regulations, 9 VAC 20-80-250.C.2 Compaction and cover requirements states;

- a. Unless provided otherwise in the permit, solid waste shall be spread into two-foot layers or less and compacted at the working face, which shall be confined to the smallest area practicable.
- b. Lift heights shall be sized in accordance with daily waste volumes. Lift height is not recommended to exceed 10 feet.
- c. Daily cover consisting of six inches of compacted soil or other approved material shall be placed upon and maintained on all exposed solid waste prior to the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. Alternate materials of an alternate thickness may be approved by the director if the owner or operator demonstrates that the alternate material and thickness control disease vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment. At least three days of acceptable cover soil or approved material at the average usage rate should be maintained at the landfill or readily available at all times.
- d. Intermediate cover of at least six inches of additional compacted soil shall be applied and maintained whenever an additional lift of refuse is not to be applied within 30 days. Further, all areas with intermediate cover exposed shall be inspected as needed, but not less than weekly. Additional cover material shall be placed on all cracked, eroded, and uneven areas as required to maintain the integrity of the intermediate cover system.
- e. Final cover construction will be initiated and maintained in accordance with the requirements of subdivision E 1 b of this section when the following pertain:
 - (1) An additional lift of solid waste is not to be applied within one year.
 - (2) Any area of a landfill attains final elevation and within 90 days after such elevation is reached. The director may approve alternate timeframes if they are specified in the facility's closure plan.
- f. Vegetative cover with proper support layers shall be established and maintained on all exposed final cover material within four months after placement, or as specified by the department when seasonal conditions do not permit. Mowing will be conducted a minimum of twice a year or at a frequency suitable for the species of vegetative cover as specified in the facility permit.

2. **Observations:** The facility has failed to meet the requirements of its Landfill Operations Manual, Section V. D. 3. Daily Cover which states; when a daily soil cover is used, it will be placed in a compacted six inch layer over the waste at the end of the day. Areas of insufficient cover were observed around the landfill during the inspection.

Legal Requirements 1: The Virginia Solid Waste Management Regulations, 9 VA20-80-240.B. General state;

Solid waste disposal facilities shall be maintained and operated in accordance with the permit issued pursuant to this chapter, and in accordance with the approved design and intended use of the facility.

The facility also received three Areas of Concern (AOC) for not meeting the requirements of VSWMR 20-80-250.C.1, 20-80-250.C.11 and 20-80-250.C.13. The attached inspection report details the AOCs.

Enforcement Authority

Virginia Code 10.1-1455 of the Waste Management Act provides for an injunction for any violation of the Waste Management Act, Waste Management Board regulations, an order, or permit condition, and provides for a civil penalty up to \$32,500 per day of each violation of the Waste Management Act, regulation, order, or permit condition. In addition, VA Code 10.1-1455 (G) authorizes the Waste Management Board to issue orders to any person to comply with the Waste Management Act and regulations, including the imposition of a civil penalty for violations of up to \$100,000. Also, VA Code 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Waste Management Act and regulations, and to impose a civil penalty of not more than \$10,000. VA Code 10.1-1455 (D) and 10.1-1455 (I) provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorney's fees and costs.

Future Actions

After reviewing this letter, please respond in writing to DEQ by **September 29, 2010** detailing actions you have taken or will be taking to ensure compliance with state law and regulations. If corrective action cannot be initiated immediately, you may be asked to sign a Letter of Agreement or enter into a Consent Order with the Department to formalize the plan and schedule. *It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Notice of Violation may avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.*

Please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. If you complete the Process for Early Dispute Resolution and are not satisfied with the resolution, you may request in writing that DEQ take all necessary steps to issue a case decision where appropriate. For further information on the Process for Early Dispute Resolution, please visit the Department's website under "Laws & Regulations" and "DEQ regulations" at:

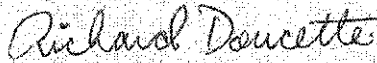
http://www.deq.virginia.gov/regulations/pdf/Process_for_Early_Dispute_Resolution_8260532.pdf
or ask the DEQ contact listed below.

Louisa County LF
SWP 194
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Notice of Violation
September 9, 2010

Your contact in this matter is Zakaria Rabei. Please direct written materials to his attention. If you have any questions regarding the content of this letter, please contact me at 703-583-3868 or by e-mail at zakaria.rabei@deq.virginia.gov.

Respectfully,



Richard Doucette
NRO Waste Program Manager

Enclosure: Inspection Report
cc: Richard Doucette - DEQ/NRO
Shawn Davis - DEQ/CO
Sarah Baker - DEQ/NRO
Zakaria Rabei - DEQ/NRO
Enforcement File
Compliance File

Note: Mr. Rabei provided the follow-up inspection to the referenced NOV. Due to the file size, I will reduce text. Highlights are mine as I think those sections relate to regulatory compliance, operational conditions, and environmental concerns. It follows:

Representatives from the Virginia Department of Environmental Quality (DEQ) arrived at Louisa County Landfill, SWP No. 194, at approximately 10:55 AM on October 19, 2010. Zakaria Rabei, Joseph Trocchio and Ladun Olaseni of the DEQ were greeted by Mr. Robert Carter, Solid Waste Manager, and Katherine Dunston, Landfill Operator. Mr. Carter escorted the DEQ representatives throughout the duration of the inspection. An exit interview was conducted with Mr. Carter to discuss the findings of the inspection.

This inspection report addresses conditions at this facility and also cites compliance requirements of the Virginia Waste Management Law and Regulations. Pursuant to Virginia Code 10.1-1455(G), this report is not a case decision under the Administrative Process Act, Code of Virginia, Section 2.2-4000 et seq.

10.1-1408.1

C.3. Every applicant shall update its disclosure statement quarterly to indicate any change of condition that renders any portion of the disclosure statement materially incomplete or inaccurate.

9 VAC 20-80-10 states that the Disclosure Statement should include "The full name, business address, and description of the business experience of all key personnel." According to the DEQ "Frequently Asked Questions, Disclosure Statements," key personnel are the applicant and any person employed in a managerial capacity, or empowered to make discretionary decisions. Licensed waste management facility operators are considered key personnel and they should be included on the disclosure form. The disclosure statement forms, DISC-01 and DISC-02, can be found on the DEQ website at:

<http://www.deq.virginia.gov/waste/wasteforms.html>.

The latest Disclosure Statement (DS) on file at the DEQ is dated December 10, 2009 and lists Kevin Linhares, Paul Snyder, and Robert Carter as key personnel.

The facility's new contractor SANTEK Environmental Inc. needs to submit a DS to DEQ and make sure to include all key personnel and licensed waste management facility operators in the DS.

10.1-1408.2

Certification and on-site presence of facility operator, states. "B. On and after January 1, 1993, all solid waste management facilities shall operate under the direct supervision of a waste management facility operator licensed by the Board for Waste Management Facility Operators."

The facility presently has three (3) licensed certified operators: Kevin Linhares, Facilities Management Director, County of Louisa with certification number 4605003024 (valid until September 30, 2011), Catherine Dunston, Landfill Operator, County of Louisa with certification number 4605002390 (valid until December 31, 2010); and Robert Carter, Solid Waste Manager, County of Louisa with certification number 4605003068 (valid until July 31, 2012). Ms. Dunston was on-site at the time of the inspection and Mr. Carter arrived at the landfill at a later time.

20-70-10 et seq. Financial Assurance

The Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer, and Treatment Facilities, 9VAC20-70-111 and 9VAC20-70-112, require that owners or operators of each solid waste management unit establish financial assurance in current dollars and provide continuous coverage until released from financial assurance requirements by the Department. These regulations also require that the owner or operator adjust the cost estimate annually for inflation and submit a revised financial assurance mechanism in the new amount.

The facility has met the requirements of financial assurance and appears to be in compliance with this regulation until December 30, 2010.

20-80-113. Control Program for unauthorized waste.

The facility owner or operator shall institute a control program (including measures such as signs at all maintained access points indicating hours of operation and the types of solid waste accepted and not accepted, monitoring, alternate collection programs, passage of local laws, etc.) to assure that only solid waste authorized by the department to be treated, disposed of or transferred at the facility is being treated,

disposed of or transferred at that facility. The facility owner or operator must develop and implement a program to teach the facility's staff to recognize, remove and report receipt of solid waste not authorized by the department to be treated, disposed of or transferred at the facility.

The unauthorized waste training is conducted annually. The facility conducted the last annual unauthorized waste training refresher on September 1, 2010.

20-80-115

The owners or operators of all permitted solid waste management facilities that treat, store, or dispose of solid waste shall report by March 31 of each year the amount of solid waste, by weight or volume, received and managed by the facility during the preceding calendar year. The reporting form to be used to fulfill the reporting requirement of this part is Form DEQ 50-25 (Solid Waste Information and Assessment Program. This form can be completed on line and submitted electronically by visiting www.deq.virginia.gov.

The facility submitted the Solid Waste Information and Assessment Form for the 2009 year and appears to be in compliance until March 31, 2011.

20-80-240.B

Solid waste disposal facilities shall be maintained and operated in accordance with the permit issued pursuant to this chapter, and in accordance with the approved design and intended use of the facility.

The facility appears to be maintained in accordance with its Solid Waste Permit No. 194.

20-80-250.B

All facilities shall be surrounded by a means of controlling vehicular access and preventing illegal disposal. All access will be limited by gates, and such gates shall be securable and equipped with locks. Access roads extending from the public road to the entrance of a facility or site and any public access area shall be all-weather, and shall be provided with a base capable of withstanding anticipated heavy vehicle loads.

The facility appears to be in compliance with this regulation.

20-80-250.C.1

Records of all inspections, to include at a minimum time and date of the inspection, the personnel involved, the hauler, the type of waste observed, the identity of the generator of the waste if it can be determined, the location of the facility where the waste was handled prior to being sent to the landfill and the results of the inspection. All records associated with unauthorized waste monitoring and incidents shall be retained on-site for a minimum of three years and shall be available for inspection by the department.

Random load inspections are conducted on a weekly basis at this facility. The random load inspections log was reviewed from August 10 through October 15, 2010 and appears to be in order.

20-80-250.C.2

- a. Unless provided otherwise in the permit, solid waste shall be spread into two-foot layers or less and compacted at the working face, which shall be confined to the smallest area practicable.
- b. Lift heights shall be sized in accordance with daily waste volumes. Lift height is not recommended to exceed 10 feet.
- c. Daily cover consisting of six inches of compacted soil or other approved material shall be placed upon all exposed solid waste prior to the end of each operating day...
- d. Intermediate cover of at least six inches of additional compacted soil shall be applied whenever an additional lift of refuse is not to be applied within 30 days. Additional cover material shall be placed on all cracked, eroded, and uneven areas as required to maintain the integrity of the intermediate cover system.
- e. Final cover construction will be initiated in accordance with the requirements of subdivision E 1 b of this section.
- f. Vegetative cover with proper support layers shall be established and maintained on all exposed final cover material within four months after placement, or as specified by the department when seasonal condition do not permit.

The facility hired a new contractor, Santek Environmental Inc., to run landfill operations. All erosion rills, exposed waste and areas of insufficient cover observed during the last inspection conducted on August 10, 2010 were addressed and repaired. The facility improved greatly and appears to be in compliance with this regulation.

20-80-250.C.3

Access to a solid waste disposal facility shall be permitted only when an attendant is on duty and only during daylight hours, unless otherwise specified in the facility permit.

Access to the site is regulated by scale house personnel.

20-80-250.C.4

Disease vectors shall be controlled using techniques appropriate for the protection of human health and the environment.

The facility appears to be in compliance with this regulation.

20-80-250.C.5

Safety hazards to operating personnel shall be controlled through an active safety program consistent with the requirements of 29 CFR Part 1910.

Safety training is conducted on a monthly basis at this facility. Safety trainings records were reviewed for August and September 2010 and appear to be in compliance with this regulation.

20-80-250.C.6

Adequate numbers and types of properly maintained equipment shall be available to a facility for operation. Provision shall be made for substitute equipment to be available within 24 hours should the former become inoperable or unavailable. Operators with training appropriate to the tasks they are expected to perform and in sufficient numbers for the complexity of the site shall be on site whenever it is in operation. Equipment and operators provided will not be satisfactory unless they ensure that the site is managed with a high degree of safety and effectiveness.

The facility appears to be in compliance with this regulation.

20-80-250.C.8.b.

Open burning of solid waste, except for the infrequent burning of agricultural wastes, silvicultural wastes, land clearing debris, diseased trees, or debris from emergency cleanup operations is prohibited. There shall be no open burning permitted on areas where solid waste has been disposed or is being used for active disposal.

Open burning is prohibited in areas where solid wastes have been disposed.

20-80-250.C.9

The owner or operator shall be responsible for extinguishing any fires that may occur at the facility. A fire control plan will be developed which outlines the response of facility personnel to fires. The fire control plan will be provided as an attachment to the emergency contingency plan required under the provisions of 9VAC20-80-520.C. 2 k. The fire control plan will be available for review upon request by the public.

A Fire Protection Plan is included in Appendix II of the Operations Manual with the facility's Safety Plan.

20-80-250.C.10

Solid waste shall not be deposited in, nor shall it be permitted to enter any surface waters or ground waters.

The facility appears to be in compliance with this regulation.

20-80-250.C.11

Owners or operators shall maintain the run-on/runoff control systems designed and constructed in accordance with subdivision B 6 of this section.

The facility appears to be in compliance with this regulation.

20-80-250.C.12

Sanitary Landfills shall not:

- a. Cause a discharge of pollutants into waters of the United States, including wetlands, that violates any requirements of the Clean Water Act (33 USC 1251 et seq.), including, but not limited to, the Virginia Pollutant Discharge Elimination System (VPDES) requirements and Virginia Water Quality Standards (9VAC25-260).
- b. Cause the discharge of a nonpoint source of pollution to waters of the United States, including wetlands, that violates any requirement of an area-wide or state-wide water quality management plan that has been approved under 208 or 319 of the Clean Water Act (33 USC 1251 et seq.), as amended or violates any requirement of the Virginia Water Quality Standards (9VAC25-260).

The facility appears to be in compliance with regulation.

20-80-250.C.13 Housekeeping.

- a. Litter and blowing paper shall be confined to refuse holding and operating areas by fences or other suitable control means.
- f. The open working face of a landfill shall be kept as small as practicable, determined by the tipping demand for unloading.
- d. Fugitive dust and mud deposits on main off-site roads and access roads shall be minimized at all times to limit nuisances.
- e. Internal roads in the landfill shall be maintained to be passable in all weather by ordinary vehicles. All operation areas and units shall be accessible; gravel or other finish materials are usually required to accomplish this. Provisions shall be made to prevent tracking of mud onto public roads by vehicles leaving the site.
- f. The open working face of a landfill shall be kept as small as practicable, determined by the tipping demand for unloading.

Neither dust nor litter was observed during the inspection. The facility appears to maintain the interior roads and keep the open working face area small as required by this regulation. The facility appears to be in compliance with this regulation.

20-80-250.C.17

Sanitary landfill may not receive the following:

- a. Free liquid.
- b. Regulated hazardous waste.
- c. Solid wastes, residues, or soils containing more than 1.0 ppb (parts per billion) TEF (dioxins).
- d. Solid wastes, residues, or soils containing more 50.0 ppm (parts per million) or more PCB's except as allowed under the provisions of 9VAC20-80-650.
- e. Unstabilized sewage sludge as defined by the Department of Health or sludges that have not been dewatered.
- f. Pesticide containers that have not been triple rinsed and crushed.
- g. Drums that are not empty, properly cleaned and opened.
- h. Contaminated soil unless approved by the director in accordance with the requirements of 9VAC20-80-630 or 9VAC20-80-700.

No unauthorized wastes were observed during the inspection.

20-80-250.C.18

Reasonable records to include date, quantity by weight or volume, and origin shall be maintained on solid waste received and processed to fulfill the requirements of the Solid Waste Information and Assessment

Program, the Control Program for Unauthorized Waste. Such information shall be made available to the department for examination or use when requested.

The daily operations log book appears to be in order.

20-80-250.E.3

a. The owner or operator of a solid waste disposal facility shall have a written closure plan. This plan shall identify the steps necessary to completely close the facility at the point of the permit period when the operation will be the most extensive and at the end of its intended life.

The Closure/Post-Closure Plan on file at the DEQ is dated October 2001, was revised on September 2002, and was approved on October 28, 2004.

20-80-280.A.1

To provide for the protection of public health and safety, and the environment, the operator shall ensure that decomposition gases generated at a facility are controlled during the periods of operation, closure and post-closure care, in accordance with the following requirements:

- a. The concentration of methane gas generated by the facility shall not exceed 25% of the lower explosive limit (LEL) for methane in facility structures (excluding gas control or recovery system components); and
- b. The concentration of methane gas migrating from the landfill shall not exceed the lower explosive limit for methane at the facility boundary.

The facility's latest gas monitoring event was conducted on July 13, 2010 and no exceedances were recorded.

20-80-280.A.2-4

- 2. The program implemented pursuant to subsections B through E of this section shall continue throughout the active life of the facility and the closure and post-closure care periods or until the operator receives written authorization to discontinue by the department. Authorization to cease gas monitoring and control shall be based on a demonstration by the operator that there is no potential for gas migration beyond the facility boundary or into facility structures.
- 3. Gas monitoring and control systems shall be modified, during the closure and post-closure maintenance period, to reflect changing on-site and adjacent land uses. Post closure land use at the site shall not interfere with the function of gas monitoring and control systems.
- 4. The operator may request a reduction of monitoring or control activities based upon the results of monitoring data collected. The request for reduction of monitoring or control activities shall be submitted in writing to the department.

The Landfill Gas Management Plan (LFGMP) is designed to continue throughout the active life of the facility and the closure and post-closure care periods.

20-80-280.B Gas Monitoring

Subject to the preconditions in 9VAC20-80-250 B, 9VAC20-80-260 B 9, and 9VAC20-80-270 B 18, the operator shall implement a gas monitoring program at the facility in accordance with the following requirements:

- 1. The gas monitoring network shall be designed to ensure detection of the presence of decomposition gas migrating beyond the landfill facility boundary and into facility structures.
- 2. The monitoring network shall be designed to account for the following specific site characteristics, and potential migration pathways or barriers, including, but not limited to: Local soil and rock conditions; Hydrogeological and hydraulic conditions surrounding the facility; Locations of buildings and structures relative to the waste deposit area; Adjacent land use, and inhabitable structures within 1000 feet of the landfill facility boundary; Man-made pathways, such as underground construction; and The nature and age of waste and its potential to generate decomposition gas.
- 4. At a minimum, the gas monitoring frequency shall be quarterly. The department may require more frequent monitoring at locations where monitoring results indicate gas migration or gas accumulation in devices or structures designed to detect migrating gas.

The facility's permit and the regulations require a minimum of quarterly monitoring of perimeter gas probes and interior spaces. The latest landfill gas monitoring readings were conducted on July 13, 2010. A review of the monitoring results for methane showed that there were no exceedances.

20-80-280.C Gas Remediation

1. When the gas monitoring results indicate concentrations of methane in excess of the action levels, 25% of the lower explosive limit (LEL) for methane in facility structures (excluding gas control or recovery system components) or 80% of the LEL for methane at the facility boundary, the operator shall:

a. Take all immediate steps necessary to protect public health and safety including those required by the contingency plan.

b. Notify the department in a written statement within five working days of learning that action levels have been exceeded, and indicate what has been done or is planned to be done to resolve the problem.

2. When the gas monitoring results indicate concentrations of methane in excess of the compliance levels, 25% of the LEL for methane in facility structures (excluding gas control or recovery system components) or the LEL for methane at the facility boundary, the operator shall, within 60 days of detection, implement a remediation plan for the methane gas releases and submit it to the department for amendment of the facility permit. The plan shall describe the nature and extent of the problem and the proposed remedy.

3. A gas remediation system shall:

a. Prevent methane accumulation in onsite structures.

b. Reduce methane concentrations at monitored property boundaries to below compliance levels in the timeframes specified in the gas remediation plan...

5. The facility shall notify the department of an initial exceedance of the compliance level or unusual condition that may endanger human health and the environment, in accordance with 9VAC20-80-570 C.

The facility addresses any gas monitoring exceedances as per its LFGMP and notifies the DEQ within the required five (5) working day timeframe. The facility also will have 60 days to implement a remediation plan upon a methane gas release which will include the nature and extent of the problem and the proposed remedy.

20-80-280.D. Odor management.

1. When an odor nuisance or hazard is created under normal operating conditions and upon notification from the department, the permittee shall within 90 days develop and implement an odor management plan to address odors that may impact citizens beyond the facility boundaries. The permittee shall place the plan in the operating record and a copy shall be submitted to the department for its records. Odor management plans developed in accordance with Virginia Air Regulations (9VAC5-40-140), 9VAC5-50-140 or other state air pollution control regulations will suffice for the provisions of this subsection

No gas odor was detected during the inspection.

20-80-280.E. Recordkeeping.

The owner or operator shall keep records of the results of gas monitoring throughout the active life of the facility and the post-closure care period. The monitoring records shall include:

1. The concentrations of the methane as measured at each probe and within each on site structure;

2. The documentation of date, time, barometric pressure, atmospheric temperatures, general weather conditions, and probe pressures;

3. The names of sampling personnel, apparatus utilized, and a brief description of the methods used;

4. A numbering system to correlate monitoring results to a corresponding probe location.

The facility appears to be in compliance with this regulation.

20-80-290.D

The collected leachate (in the order of preference) shall be:

1. Discharged directly or after pre-treatment into a line leading to the publicly owned treatment works or other permitted wastewater treatment facility;

2. Transported by a vehicle to an off-site permitted wastewater treatment facility;

3. Recirculated within the landfill, provided that the irrigated area is underlain by a composite liner and that the operation causes no odors, runoff or ponding; or

4. Treated on-site and discharged into surface water when authorized under VPDES permit issued by the State Water Control Board or otherwise approved by that agency.
- E. The collected leachate shall not be discharged to an underground drain field.

While a leachate collection system does not exist for the landfill, leachate collection occurs in twelve (12) concrete riser pipes which were originally installed to vent methane gas. On August 30, 2010 the facility hauled 1,000 gallons of leachate by Groom Septic Services.

Per the facility's action plan for the landfill repairs; **Part 7. Existing Leachate Wells** of the plan; the facility will remove the existing leachate pumping lines which will include excavation of capping material, cut-back GCL Liner, cut pipe below GCL Liner, backfilling, ...etc. The facility needs to submit a new closure certification once the closed area is disturbed.

20-80-300.A.2

a. Owners or operators of all landfills shall implement a ground water monitoring program capable of determining the facility's impact on the quality of ground water in the uppermost aquifer underlying the facility.

The facility has implemented a ground water monitoring program in accordance with requirements in the regulations and its solid waste permit.

20-80-300.A.3.a. Ground water monitoring system

A ground water monitoring system shall be installed consisting of a sufficient number of wells, at appropriate locations and depths, capable of yielding ground water samples from the uppermost aquifer that:

- (1) Represent the quality of background ground water that has not been affected by a release from the waste management unit; and
- (2) Represent the quality of ground water at the waste management unit boundary.

The facility has an existing ground water monitoring system consisting of what appears to be a sufficient number of wells. The well locations were cleared of vegetation, locked, and properly labeled.

20-80-300. A.3.b-f

f. (2) At least one upgradient and three downgradient monitoring wells shall be required within a compliance network.

The facility has an existing ground water monitoring system consisting of one up gradient well, MW-5A, and four down gradient wells, MW-1, MW-3, MW-4A, and NES-7. The County maintains two observation wells, MW-5 and MW-6. In addition, the County maintains four performance monitoring wells, NES-2, NES-2D, NES-7, and NES-8, and six sentinel monitoring wells, NES-1, NES-3, NES-4, NES-5, NES-6, and MW-2D as part of the corrective action program. NES-7 replaced MW-2 which was abandoned on February 12, 2009.

20-80-300.A.4. Sampling and Analysis

a. The ground water monitoring program shall include consistent field sampling analysis procedures that are designed to ensure monitoring results that provide an accurate representation of the ground water quality at the background and down gradient wells. At a minimum the program shall include procedures and techniques for: sample collection; sample preservation and shipment; analytical procedures; chain of custody control; and quality assurance and quality control.

The facility has contracted all ground water activities including monitoring and sampling to Joyce Engineering, Inc. (JEI) to ensure that all aspects of this regulation are met. The consultant is working with the facility and DEQ to maintain compliance.

20-80-300.B.2

The ground water monitoring system at the facility should be sampled and the samples analyzed according to the requirements in the regulations and their solid waste permit in order to detect constituents that would indicate a release from the waste management unit which is potentially harmful to human health or safety.

JEI ensures that ground water at the facility is sampled and analyzed according to the requirements in the regulations and the facility's solid waste permit. The facility conducts two semiannual monitoring events.

20-80-300.B.3

a. Unless exempt under subdivision 1 c of this subsection, the owner or operator shall implement the assessment monitoring program whenever a statistically significant increase over background has been detected for one or more of the constituents listed in Table 5.5.

Louisa County implemented the Assessment Monitoring Program (AMP) on September 30, 1999. The facility is required to sample the background and compliance GW monitoring wells in accordance with Permit Module XI.

20-80-300.B.3.g

If one or more Table 5.1 constituents are detected at statistically significant levels above the ground water protection standard established under subdivision 3 h or i of this subsection in any sampling event, the owner or operator shall, within 14 days of this finding, notify the department identifying the Table 5.1 constituents that have exceeded the ground water protection standard.

On May 3, 2010, the facility submitted a Groundwater Protection Standard (GPS) exceedance notification. During the 2010 first semiannual sampling event conducted on April 7, 2010 the following constituents were detected at concentrations above their respective GPS: barium, benzene, chlorobenzene, cobalt, chloroethane, 1,1-dichloroethane, cis-1,2-dichloroethene, mercury, methylene chloride, selenium, tetrachloroethene, trans-1,2-dichloroethene, trichloroethene, and vinyl chloride.

20-82-300.B.3.h

The owner or operator shall determine a ground water protection standard for all detected Table 5.1 constituents. The ground water protection standard shall be:

- (1) For constituents for which a maximum contaminant level (MCL) has been promulgated under §1412 of the Safe Drinking Water Act (40 CFR Part 141), the MCL for that constituent;
- (2) For constituents for which MCLs have not been promulgated, the background concentration, as approved by the director, for the constituent established from wells in accordance with subdivision A 3 a (1) of this subsection; or
- (3) For constituents for which the background level is higher than the MCL identified under subdivision 3 h (1) of this subsection or health-based levels identified under subdivision 3 i of this subsection, the background concentration as approved by the director.

Groundwater Protection Standards (GPS) were submitted to the Department on June 26, 2001 and approved February 21, 2002.

20-80-300.E.2.b

2.b. (2) The Annual Report shall be submitted to the director no later than March 1 of each calendar year and shall be accompanied by a signature page and a completed form ARSC-01.

The 2009 Annual Groundwater Monitoring report was received on February 25, 2010 and approved on May 10, 2010.

20-80-310.C. Corrective Action Program

1. Based on the schedule established under subdivision A 4 a (3) or B 4 of this section for initiation and completion of remedial activities, the owner or operator shall:

a. Establish and implement a corrective action ground water monitoring program that:

- (1) At a minimum, meets the requirements of a ground water monitoring program under 9VAC20-80-300;
- (2) Indicates the effectiveness of the corrective action remedy; and

(3) Demonstrates compliance with the ground water protection standard pursuant to subdivision 5 of this subsection.

b. Implement the remedy selected under subdivision A 4 or subsection B of this section; and

c. Take any interim measures necessary to ensure the protection of human health and the environment.

Interim measures should, to the greatest extent practicable, be consistent with the objectives of and contribute to the performance of any remedy that may be required pursuant to subsection B of this section.

On June 17, 2008, JEI submitted a Minor Permit Amendment to replace monitoring well MW-2 due to its location (approx. 2 ft) from the edge of the waste. The DEQ approved the replacement of MW-2 with NES-7 on October 14, 2008 and MW-2 was abandoned on February 12, 2009.

20-80-570.C

3. The permittee shall report to the department any noncompliance or unusual condition which may endanger health or environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and, if the noncompliance has not been corrected, the anticipated time it is expected to continue. It shall also contain steps taken or planned to reduce, eliminate and prevent reoccurrence of the noncompliance.

The facility should provide to DEQ reports of any noncompliance or unusual conditions which may endanger human health or the environment. Any information should be provided within 24 hours from the time that personnel become aware of the circumstances.

20-80-630. General

A. The requirements and standards contained in this part apply to solid waste that requires special handling and precautions and are in addition to the general requirements contained in Parts V (9VAC20-80-240 et seq.) and VI (9VAC20-80-320 et seq.) of this chapter, as applicable.

1. Facilities may receive solid waste that requires special handling for processing or disposal only with specific approval of the director or by specific provisions within the facility permit. The operator should contact the department for advice about new or unusual wastes and proper handling techniques. If it is not clear that a particular waste is within the authorized wastes that a permitted facility may receive, it is required that the operator receive a letter of clarification from the department before receiving the waste.

Fluids should be drained from all power equipment prior to placing them in the metal pile.

20-80-640. Asbestos-containing wastes materials

C. Waste preparation for disposal. In order for asbestos-containing waste materials to be accepted at the disposal site, asbestos-containing waste materials received at the disposal site shall meet the following requirements:

1. Conform to all packaging requirements contained in 40 CFR 61.149 and 61.150, National Emission Standards for Asbestos.

a. All asbestos-containing waste materials generated in a manufacturing, fabrication, or spraying operation and all RACM generated in a demolition or renovation operation shall be placed in leak-tight containers while wet. Materials that will not fit into containers without additional breaking shall be put into leak-tight wrapping.

b. The containers or wrapped materials specified in subsection 1 a of this section shall be labeled using warning labels specified by Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(2) or 1926.58(k)(2)(iii). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible and shall contain the following information:

DANGER CONTAINS ASBESTOS FIBERS AVOID CREATING DUST CANCER AND LUNG DISEASE HAZARD

c. For materials transported off-site, label containers or wrapped materials with a name of the waste generator and the location at which the waste was generated. For small items, the label may serve as wrapping.

According to the facility's Operations Manual, the facility may receive nonfriable Asbestos Containing Material (ACM); however, friable ACM shall not be accepted at this facility.

20-80-660

Free liquids cannot be disposed of in a landfill. Free liquids and poorly contained liquids shall be absorbed on solid material before being placed in a sanitary landfill.

The facility does not allow liquids into the landfill. Any free liquids are mixed with solid material to be absorbed prior to being placed in the landfill.

20-80-670

D. More than 1,000 discarded tires shall not be stored at a solid waste disposal facility unless the permit for the facility expressly allows such storage. Tires disposed of in a sanitary or construction/demolition/debris landfill shall be split, cut, or shredded before disposal and should be dispersed in the workface with other solid wastes. Alternate burial not incorporating cutting or splitting at a specific facility may be approved if the method will assure that tires will not emerge from the burial facility.

The DEQ allows the facility to landfill tires that are not split but instead have the side walls cut out. Whole tires accepted at the facility are stored in an enclosed trailer on site. Once the trailer is full it is taken off-site for the tires to be shredded and recycled.

20-80-680

Drums and other bulk containers shall not be disposed until emptied, properly cleaned and opened at both ends and crushed.

No drums or any other bulk containers were observed at the time of the inspection.

20-80-690

Appliances and other white goods may be accumulated at a facility for not more than 60 days prior to salvage or disposal. An alternate schedule may be approved.

The facility includes white goods in its scrap metal pile and has the pile shipped out on a 60 day or less cycle. The facility keeps a record book for the scrap metal received and shipped out of the facility. The last scrap metal piles were shipped out on October 11 and 13, 2010.

20-80-700

1. The specific requirements contained in this section apply to requests by the owner or operator of a solid waste disposal facility for approval of disposal of soil contaminated solely with petroleum and petroleum products, including but not limited to diesel fuels, kerosene, gasoline, hydraulic fluids, jet engine fuel, and motor oil.
2. Any contaminated soil from a state other than Virginia that is classified as a hazardous waste in the state of origin shall be managed as a hazardous waste. Such wastes are not acceptable for disposal in a solid waste management facility in the Commonwealth.

The facility does not accept soil contaminated with petroleum products.

20-80-710

A. Discarding, placing with municipal mixed solid waste, or otherwise disposing of used lead acid (wet-cell) batteries is prohibited (see 9VAC20-80-70). All such batteries shall be delivered to a battery retailer, an agent of the battery wholesaler, a battery manufacturer, a secondary lead smelter, or a collection or reclamation facility permitted or otherwise authorized by the department, or other state or federal regulations.

The facility appears to be in compliance with this regulation.

Note: Mr. Rabei provided the following letter:
January 3, 2011

Mr. Kevin S. Linhares, Director
Louisa County Department of Facilities Management
P.O. Box 1980
105 Woolfolk Avenue
Louisa, VA 23093

**Re: Louisa County Sanitary Landfill - SWP No. 194
Compliance Inspection on December 21, 2010**

Dear Mr. Linhares:

Thank you for the cooperation of your staff during the compliance inspection conducted at your facility by the Virginia Department of Environmental Quality (DEQ), Northern Regional Office (NRO) on December 21, 2010. During the inspection, the facility appeared to be in compliance with the provisions of its permit, the Virginia Solid Waste Management Regulations (9 VAC 20-80-10 *et seq.*) and/or the Virginia Financial Assurance Regulations (9 VAC 20-70-10 *et seq.*).

If you should have any question regarding this matter, please contact me at (703) 583-3868 or by e-mail zakaria.rabei@deq.virginia.gov.

Respectfully,

Zakaria M. Rabei
Environmental Specialist II

Enclosure: Inspection Report

cc: Richard Doucette - DEQ/NRO
File

Mr. Rabei provided another letter as follows:
October 26, 2010

Mr. Kevin S. Linhares, Director
Louisa County Department of Facilities Management
P.O. Box 1980
105 Woolfolk Avenue
Louisa, VA 23093

**Re: Louisa County Sanitary Landfill - SWP No. 194
Compliance Inspection on October 19, 2010**

Dear Mr. Linhares:

Thank you for the cooperation of your staff during the compliance inspection conducted at your facility by the Virginia Department of Environmental Quality (DEQ), Northern Regional Office (NRO) on October 19, 2010. During the inspection, the facility appeared to be in compliance with the provisions of its permit, the Virginia Solid Waste Management Regulations (9 VAC 20-80-10 *et seq.*) and/or the Virginia Financial Assurance Regulations (9 VAC 20-70-10 *et seq.*).

If you should have any question regarding this matter, please contact me at (703) 583-3868 or by e-mail zakaria.rabei@deq.virginia.gov.

Respectfully,

Zakaria M. Rabei
Environmental Specialist II

Enclosure: Inspection Report

cc: Richard Doucette - DEQ/NRO
File

(Fourth contact)
Kentucky
Mr. Scott Gerstner
Environmental Inspector
Kentucky Department for Environmental Protection

Division of Waste Management
Louisville Regional Office
9116 Leesgate Road
Louisville, KY 40222
(502) 429-7120

Mr. Gerstner was contacted on 01/26/11...and has been dealing with the Hardin County landfill for 2 years. He told me that Santek "does a fine job." Mr. Gerstner told me that the Hardin County landfill was situated in a "good location", and he did not know if engaging Santek increased fees to the public at the Hardin County landfill. He indicated that Santek has a contract with the county...it is not a difficult landfill...it is a "valley fill" and Santek does conduct blasting at that location...they have not had any water quality problems...they conduct daily leachate haul off...and they have not had any sediment problems at the Hardin County landfill.

At a time later in the day, Mr. Gerstner sent me an e-mail that reads as follows:

"Hi Marc,

Santek has been managing daily operations at the Hardin County Landfill since September 29, 2008. I have inspected the landfill 9 times since that date. No violations were identified during any of the inspections. The Annual Survey which summarized operations in 2009 indicated the landfill received 386.7 tons per day during that time period. The most recent quarterly report from the 3rd quarter of 2010 indicated that 34,035 tons of waste was received during the quarter.

Harry Berry is the Hardin County Judge Executive and is the local contact.
He can be reached at (270) 765-2350.

Please give me a call if you have any other questions.
I can be reached at (502) 429-7120.

Sincerely,
Scott Gerstner
Kentucky Division of Waste Management"

Following is a letter from the Hardin County Judge Executive, Mr. Harry Berry:



Hardin County Government

Judge/Executive Harry L. Berry
P.O. Box 568, Elizabethtown, Kentucky 42702

*The Commonwealth's
Premier County
To Live, Work, and
Raise a Family*

December 10, 2010

Mr. Matt Dillard
Executive Vice President of Operations
Santek Environmental
650 25th Street, N.W., Suite 100
Cleveland, Tennessee 37311

Dear Mr. Dillard:

Please accept my congratulations for the successful Energy and Environment Cabinet's Compliance Inspection conducted on December 3, 2010!

I am always grateful for your genuine concern for our county landfill.

I appreciate your commitment to provide excellent services at the best possible value to our citizens.

Thank you!

Sincerely,

Harry L. Berry
Hardin County Judge/Executive

HLB:sp
Copy: S Smith

Office: (270) 765-2350 • Fax: (270) 737-5590 • E-mail: hgo@hcky.org

Ohio

Mr. John Pasquarette
Environmental Manager
Division of Solid and Infectious Waste Management
Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 373- 3057

Mr. Pasquarette was contacted on 01/27/11. I had the impression that his initial answers were guarded until I went deeper in establishing my credibility and legitimate connection to Haywood County...gave him complete contact information including web site. Once he was comfortable that he was talking "regulator to regulator", he gave a stunning endorsement of the Santek Company.

Mr. Pasquarette's first statement then was, "We really love Santek." They have been in charge of the Crawford County landfill for 8-10 years he thought. During this time, there has been no enforcement at that site. For the six (6) years prior to Santek gaining the operation, the Crawford County landfill had been issued approximately one (1) Notice of Violation per year. He said that the county's decision to hire Santek was, "one of the best decisions the county ever made."

He told me that one of the key players in Crawford County at the time was a Mr. Carl Watt. Mr. Watt was one of the Commissioners...was a former banker...and did not really have a sense of specifics and the depth of the problems at the Crawford County landfill. But...Mr. Watt did realize that, "the numbers didn't match up", and that something really needed to be done. Mr. Pasquarette told me that Santek, "came in as a bit of a White Knight" and handled the permitting...and started Crawford County in the right direction. Mr. Pasquarette said that, "Santek has a good corporate mentality...they work with the regulators and not against them." He used the expression, "It was a win, win, win."

In the 8-10 years that Santek has been operating the Crawford County landfill, they have had three (3) different operators (sub-contracting companies I assume) that they hired to conduct the day-to-day operations...and that he and the county were pleased with all three. He indicated that Santek has a good track record for hiring good operators...and again...they cooperate with the regulators. Mr. Pasquarette said that he does not have direct knowledge of how Santek works with NPDES requirement for storm water...and that since he is "solid waste"...the surface water regulators are in control of the NPDES requirements affecting surface waters of the state. Mr. Pasquarette said that "Rob Burnette" has been there with Santek the entire time, and he indicated to me that Mr. Burnette was a quality player. Then Mr. Pasquarette said, "These guys are the real deal."

Mr. Pasquarette said that Santek, "took one bad case where the operator was pumping leachate straight into a stream." He said Santek corrected the problems...and he said the operator served jail time for the violation. Also...Mr. Pasquarette said Santek corrected problems on a landfill in Ohio where the operator had taken the protective sand layer off the liner...the liner was somewhat "damaged" but the operator continued to place trash on the damaged area...the county eventually had to remove thousands of tons of trash to get down to the problem...somehow, the county found Santek...they corrected the problem...and the county was "real pleased."

(e-mail received ~12:08PM on 01/27/2011)

Mr. Pruet

As requested here are copies of the 2 most recent inspection letters for the Crawford County Landfill in Bucyrus, Ohio. I neglected to mention during our discussion that we regulate the facility in conjunction with the Crawford County Health Department. You

will notice that these required quarterly operational inspections have been performed by the health department. I tried to find some photographs of the landfill, but I don't think any of our pictures (close ups of waste, close ups of soil construction work, images of a recent leachate tank construction, etc.) will serve your needs of providing broad landscape views of the site for incorporation into your presentation. I am sure the facility and/or Santek could provide such images to you.

If you have any additional questions please feel free to contact us.

John Pasquarette
Environmental Manager
Ohio EPA, Divisions of Solid and
Hazardous Waste Management
347 N. Dunbridge Rd.
Bowling Green, OH 43402
phone (419) 373-3057
fax (419) 352-8468

R

Crawford County General Health District

130 N. Walnut St.
Suite B
Bucyrus, Ohio 44820

W. Scott Kibler, MA, FACHE
Health Commissioner

Phone 419-562-5871
FAX 419-562-2048

Email: Environmental@crawford-co.org

December 22, 2010

Mr. Gary Adkins
Crawford County Sanitary Landfill
5128 Lincoln Highway E.
Bucyrus, Ohio 44820

RECEIVED
DEC 23 2010

OHIO E.P.A.
N.W.D.O.

Dear Mr. Adkins:

On December 21, 2010, a comprehensive inspection of the Crawford County MSW Landfill & the C&DD Landfill was conducted by Ryan Sendelbach of the Crawford County General Health District. The inspection started in Pete Kemp's office reviewing records and daily logs, which were all present and in order.

The weather on this day was approximately 20°F, cloudy, with some snow cover. Mr. Ryan Richards representing Santek accompanied myself on the visual inspection, which started at the new cell (5A). The cell is completed and waiting on approval from the OEPA.

From the new cell the inspection moved to the working face which was sized appropriately and maintained in good condition. While inspecting the working face, a large pile of soil was observed south of the working face being used for daily cover. A pile of autofluff was observed north of the working face, which controlled the area to a manageable size.

From the working face, the inspection moved to the leachate storage tanks. Everything appeared normal, with all sump crock levels showing less than 12" in liquid level. The two storage tanks averaged 4.5 feet of leachate within each tank.

The inspection then moved from the storage tanks to the C&DD site where no activity was observed. No new waste was in the unloading zone at the time of the inspection. No violations were observed at that time.

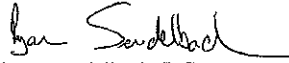
The inspection ended at the current borrow pit located at the Northeast part of the property.

During the inspection multiple trash bags were observed along the access roads. Temp. pickers are controlling the blowing trash very well. Overall, the facility is well maintained and was operating properly during the inspection. Thanks to you and your staff for your cooperation and hospitality during this inspection.

Crawford Co.
Crawford Co. LF
Inspections

Rt: No

Sincerely,

A handwritten signature in black ink that reads "Ryan Sendelbach". The signature is written in a cursive style with a long horizontal stroke at the end.

Ryan Sendelbach, R.S.
Division of Environmental Health

Cc: Tyler Madeker, OEPA NW District Office, DSIWM

Municipal Solid Waste Landfill Facility Inspection Checklist

Facility Name: Crawford County Sanitary Landfill ID #: MSW-7270 Date: 12-21-10 County: Crawford
 Facility Address: 5128 Lincoln Hwy. E., Bucyrus, Ohio 44820 Facility Phone #: 419-562-4039
 Operator Name: Gary Adams Operator Phone #: 419-562-4039
 Corporate Address: 540 25th St. NW suite 100 Cleveland TN Corp. Phone # (If Diff.): 423-476-9160
 Health District: Crawford County Inspector(s): 37211 Ryan Sandelbach

Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable to this facility. This checklist is not all inclusive of regulations applicable to MSW landfill facility operations.

This is a: * Comprehensive Inspection * Partial Inspection * Comments on Back

YES		NO	
3745-27-05 Prohibited Disposal Methods	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(e) Acceptance of infectious waste
<input checked="" type="checkbox"/> (B) No Open Burning	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(f) Acceptance of yard waste
3745-27-09 Operating Record	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(g) Acceptance of scrap tires
<input checked="" type="checkbox"/> (B) Establish and maintain	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(h) Acceptance of low level rad. waste
<input checked="" type="checkbox"/> (C) Location and inspection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(i) Acceptance of semi-solid material w/free liquid
<input checked="" type="checkbox"/> (D) Contents	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(9) Control of scattered litter
<input checked="" type="checkbox"/> (F) Annual update	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(10) Keeping of daily logs
3745-27-19 Operation of a Facility	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(11) Daily/weekly inspection of facility
<input checked="" type="checkbox"/> (E)(1)(a) Clear naturally occurring vegetation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(12) Copy of auth. docs available
<input checked="" type="checkbox"/> (b) Plug/abandon wells	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(F) Daily cover
<input checked="" type="checkbox"/> (c) Maintain integrity of eng. components	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(G) Intermediate cover
<input checked="" type="checkbox"/> (d) Chemical comp. testing (if necessary)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(H) Final cover
<input checked="" type="checkbox"/> (2)(a) Maintain access roads	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(I) Scales
<input checked="" type="checkbox"/> (b) Limited access to facility	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(J)(1) Surface water diversion
<input checked="" type="checkbox"/> (c) Signs posted	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(2) Design in operating record
<input checked="" type="checkbox"/> (d) Exclusion of animals	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(3) Ponding and erosion
<input checked="" type="checkbox"/> (3)(a) Adequate fire equipment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(4) Surface water monitoring
<input checked="" type="checkbox"/> (b) Operable and adequate equipment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(K)(1) Leachate outbreak control
<input checked="" type="checkbox"/> (4) Improper salvaging	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(2) Lift station back-up pumps
<input checked="" type="checkbox"/> (5) Trained employees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(3) Collection pipe network (inspection)
<input checked="" type="checkbox"/> (6) Preparation for inclement weather	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(4) Temporary leachate storage
<input checked="" type="checkbox"/> (7)(a) Leachate treatment/disposal	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(5) Leachate treatment and disposal
<input checked="" type="checkbox"/> (b) Phased operation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(6) Leachate storage/disposal contingency plan
<input checked="" type="checkbox"/> (c) Confined unloading	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(7) Surface water monitoring
<input checked="" type="checkbox"/> (d) Separation/control of burning waste	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(L) PCB and hazardous waste prevention and detection program
<input checked="" type="checkbox"/> (e) Waste disposed at working face	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(O)(1) Source separated yard waste
<input checked="" type="checkbox"/> (f)(i) Compacting bulky items	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	(2) Yard waste restriction program
<input checked="" type="checkbox"/> (ii) Minimizing dust generation			
<input checked="" type="checkbox"/> (8)(a) NESHAP reg. asbestos disposal			
<input checked="" type="checkbox"/> (b) Acceptance of liquids			
<input checked="" type="checkbox"/> (c) Acceptance of hazardous waste			
<input checked="" type="checkbox"/> (d) Acceptance of PCBs			
		3745-37-01 License	
		<input checked="" type="checkbox"/> (A) Valid license	

Additional Facility Aspects to Review: Operating Record, Groundwater and Explosive Gas Monitoring, Financial Assurance, and Compliance with Operating License and Authorizing Documents.

Cloudy and 20° @ time of inspection. Ground was covered w/ snow.

Ryan Sandelbach | Ryan Sandelbach | 12-22-10
 Print Name of Inspector Completing Form | Inspector's Signature | Date

Construction & Demolition Debris Facility Inspection Checklist

Facility Name: Crawford County Sanitary Landfill ID #: CDDL-278707 Date: 12-21-10 County: Crawford
 Facility Address: 5122 Lincoln Hwy. Bucyrus Ohio 44820 Facility Phone #: 419-562-4039
 Operator Name: Erny Adkins Operator Phone #: 419-562-4039
 Corporate Address: 540 25th St. Nw Suite 100 Cleveland TN 37311 Corp. Phone # (If Diff.): 423-426-9160
 Health District: Crawford Inspector(s): Ryan Sandelback

Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable to this facility. This checklist is not all inclusive of regulations applicable to C&DD facility operations.

This is a: Comprehensive Inspection Partial Inspection Comments on Back

YES	NO	YES	NO
3745-400-04 Prohibited Disposal Methods		(I) Access to Facility	
<input checked="" type="checkbox"/>	<input type="checkbox"/> (A)(3) No Open Burning	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1) Access limited to authorized personnel
3745-400-11 Operation of a Facility		<input checked="" type="checkbox"/>	<input type="checkbox"/> (2) Exclusion of animals (except for security)
(B) Compliance		<input checked="" type="checkbox"/>	<input type="checkbox"/> (3) Licensing authority's right of entry
<input checked="" type="checkbox"/>	<input type="checkbox"/> (2) Placement of debris only in active licensed disposal area	<input checked="" type="checkbox"/>	<input type="checkbox"/> (4) Maintenance of access roads
<input checked="" type="checkbox"/>	<input type="checkbox"/> (9) Keeping of daily logs	<input checked="" type="checkbox"/>	<input type="checkbox"/> (5) Minimize dirt tracked onto public roads
<input checked="" type="checkbox"/>	<input type="checkbox"/> (11) Properly trained employees	<input checked="" type="checkbox"/>	<input type="checkbox"/> (6) Post instructions at facility entrance
<input checked="" type="checkbox"/>	<input type="checkbox"/> (15) Facility shall not cause or allow nuisance or health hazard	<input checked="" type="checkbox"/>	<input type="checkbox"/> (J) Inclement Weather Preparation
(E) Construction		<input checked="" type="checkbox"/>	<input type="checkbox"/> (K) No Scavenging
<input checked="" type="checkbox"/>	<input type="checkbox"/> (1) Maintain & repair engineered components	<input checked="" type="checkbox"/>	<input type="checkbox"/> (L) Control of Scattered Litter
<input checked="" type="checkbox"/>	<input type="checkbox"/> (3) Visual barrier (if applicable)	<input checked="" type="checkbox"/>	<input type="checkbox"/> (M) Adequate Fire Control Equipment
(F) Waste Acceptance		<input checked="" type="checkbox"/>	<input type="checkbox"/> (O) Leachate Outbreaks
<input checked="" type="checkbox"/>	<input type="checkbox"/> (1) Don't accept hazardous or infectious waste or containerized bulk liquids	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1) Contain leachate outbreaks
<input checked="" type="checkbox"/>	<input type="checkbox"/> (2) Accept solid wastes only as authorized [construction materials packaging, tree parts, NESHAP asbestos (if properly permitted), etc.]	<input checked="" type="checkbox"/>	<input type="checkbox"/> (2) Manage leachate according to rules
<input checked="" type="checkbox"/>	<input type="checkbox"/> (3) Designated unloading zones (if no approved pre-screening process)	<input checked="" type="checkbox"/>	<input type="checkbox"/> (3) Repair area of leachate outbreak
<input checked="" type="checkbox"/>	<input type="checkbox"/> (a) Zone separate from working face	<input checked="" type="checkbox"/>	<input type="checkbox"/> (P) Leachate System Management
<input checked="" type="checkbox"/>	<input type="checkbox"/> (b) Mark limits of unloading zone with at least two temporary markers	<input checked="" type="checkbox"/>	<input type="checkbox"/> (3) Proper disposal of leachate
<input checked="" type="checkbox"/>	<input type="checkbox"/> (4) Proper separation of burning materials	<input checked="" type="checkbox"/>	<input type="checkbox"/> (Q) Surface & Ground Water Management
<input checked="" type="checkbox"/>	<input type="checkbox"/> (G) Adequate Operating Equipment Available	<input checked="" type="checkbox"/>	<input type="checkbox"/> (1) Diversion of surface & ground waters
(H) Operate Facility so as to Prevent Fires		<input checked="" type="checkbox"/>	<input type="checkbox"/> (2) Proper facility grading
<input checked="" type="checkbox"/>	<input type="checkbox"/> (1) Cover all combustible debris weekly, or;	<input checked="" type="checkbox"/>	<input type="checkbox"/> (3) Correction of ponding and erosion
<input checked="" type="checkbox"/>	<input type="checkbox"/> (2) Prepare and utilize an alternate fire prevention plan. Cover all combustible debris monthly plus another method(s) to prevent fires	<input checked="" type="checkbox"/>	<input type="checkbox"/> (4) Correction of silting problems
		<input checked="" type="checkbox"/>	<input type="checkbox"/> (5) Surface water monitoring (if req'd)
		3745-37-01 License	
		<input checked="" type="checkbox"/>	<input type="checkbox"/> (C) Valid license

Cloudy and 20° @ time of inspection. Snow covered!

No activity @ time of inspection.

leachate disposed at Bucyrus & Galien waste water treatment plant

Ryan Sandelback Ryan Sandelback 12-22-10
 Print Name of Inspector Completing Form Inspector's Signature Date

Effective: August 31, 2002

Crawford County General Health District

130 N. Walnut St.
Suite B
Bucyrus, Ohio 44820

W. Scott Kibler, MA, FACHE
Health Commissioner

Phone 419-562-5871
FAX 419-562-2048

Email: Environmental@crawford-co.org

August 30, 2010

Mr. Gary Adkins
Crawford County Sanitary Landfill
5128 Lincoln Highway E.
Bucyrus, Ohio 44820

RE: Crawford County Sanitary Landfill Inspection

Dear Mr. Adkins:

Please be advised that on August 27, 2010, an inspection was done of the Crawford County Landfill by this office. I was accompanied by Mr. Ryan Richards representing the Landfill. The weather on this morning was approximately 75°F and sunny.

The inspection started at the working face, which was adequately sized and maintained. During the inspection little to no scattered litter was observed. Daily cover was observed in a pile next to the working face along with two piles of auto fluff, which is being mixed in with the solid waste throughout the course of the day. From the working face, the inspection moved to the site of the next cell which is located west of the existing facility. Ryan Richards stated that the cell will be completed in two sections working north to south.

The inspection moved from the new cell to the leachate storage tank area, where things appeared to be in proper order. The levels of leachate in the sump crock were all under 12". The second storage tank has been pressure tested by Mr. Richards, but is not up and operational quite yet.

We then went to the Construction and Demolition Debris landfill, where everything appeared to be in proper order. No waste was unloaded or being compacted at the time of inspection. Two barrels were observed marking the unloading zone with a ten yard dumpster available for any MSW. The access road has been restructured since the last inspection due to the growth of the cell.

During the inspection a water truck was observed watering the access roads to minimize the dust. Ryan mentioned that the landfill had a temp. mowing and that the closed facility had been mowed. Overall, the facility is well maintained and operated properly during the inspection.

The inspection ended by reviewing the office records, which all appeared to be in proper order during the inspection.

Thanks to you and your staff for your cooperation during the inspection. If you have any questions in regards to this report, please contact me at 419-562-5871 ext. 1203.

*Crawford Co.
Crawford Co. LF
Inspections*

Sincerely,

A handwritten signature in cursive script that reads "Ryan Sendelbach". The signature is written in black ink and is positioned above the typed name.

Ryan Sendelbach R.S.
Environmental Division

Cc: Tyler Madeker NW District EPA Office, Bowling Green, OH 43402

RECEIVED
AUG 31 2010
OHIO E.P.A.
N.W.D.O.

Municipal Solid Waste Landfill Facility Inspection Checklist

Facility Name: Crawford County Sanitary Landfill ID #: MSW-2270 Date: 8-27-10 County: Crawford
 Facility Address: 5128 Lincoln Hwy E. Bucyrus, Ohio 44820 Facility Phone #: 419-562-4039
 Operator Name: Garry Adkins Operator Phone #: 419-562-4039
 Corporate Address: 540 25th St. NW Suite 100 Cleveland TN Corp. Phone # (If Diff.): 423-476-9160
 Health District: Crawford County Inspector(s): 37311 Ryan Sendelbach

Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable to this facility. This checklist is not all inclusive of regulations applicable to MSW landfill facility operations.

This is a: * Comprehensive Inspection * Partial Inspection * Comments on Back

YES NO		YES NO	
3745-27-05 Prohibited Disposal Methods			
<input checked="" type="checkbox"/>	(B) No Open Burning	<input checked="" type="checkbox"/>	(e) Acceptance of infectious waste
<input checked="" type="checkbox"/>	(B) Establish and maintain	<input checked="" type="checkbox"/>	(f) Acceptance of yard waste
<input checked="" type="checkbox"/>	(C) Location and inspection	<input checked="" type="checkbox"/>	(g) Acceptance of scrap tires
<input checked="" type="checkbox"/>	(D) Contents	<input checked="" type="checkbox"/>	(h) Acceptance of low level rad. waste
<input checked="" type="checkbox"/>	(F) Annual update	<input checked="" type="checkbox"/>	(i) Acceptance of semi-solid material w/free liquid
3745-27-09 Operating Record			
<input checked="" type="checkbox"/>	(E)(1)(a) Clear naturally occurring vegetation	<input checked="" type="checkbox"/>	(9) Control of scattered litter
<input checked="" type="checkbox"/>	(b) Plug/abandon wells	<input checked="" type="checkbox"/>	(10) Keeping of daily logs
<input checked="" type="checkbox"/>	(c) Maintain integrity of eng. components	<input checked="" type="checkbox"/>	(11) Daily/weekly inspection of facility
<input checked="" type="checkbox"/>	(d) Chemical comp. testing (if necessary)	<input checked="" type="checkbox"/>	(12) Copy of auth. docs available
<input checked="" type="checkbox"/>	(2)(a) Maintain access roads	<input checked="" type="checkbox"/>	(P) Daily cover
<input checked="" type="checkbox"/>	(b) Limited access to facility	<input checked="" type="checkbox"/>	(G) Intermediate cover
<input checked="" type="checkbox"/>	(c) Signs posted	<input checked="" type="checkbox"/>	(H) Final cover
<input checked="" type="checkbox"/>	(d) Exclusion of animals	<input checked="" type="checkbox"/>	(I) Scales
<input checked="" type="checkbox"/>	(3)(a) Adequate fire equipment	<input checked="" type="checkbox"/>	(J)(1) Surface water diversion
<input checked="" type="checkbox"/>	(b) Operable and adequate equipment	<input checked="" type="checkbox"/>	(2) Design in operating record
<input checked="" type="checkbox"/>	(4) Improper salvaging	<input checked="" type="checkbox"/>	(3) Ponding and erosion
<input checked="" type="checkbox"/>	(5) Trained employees	<input checked="" type="checkbox"/>	(4) Surface water monitoring
<input checked="" type="checkbox"/>	(6) Preparation for inclement weather	<input checked="" type="checkbox"/>	(K)(1) Leachate outbreak control
<input checked="" type="checkbox"/>	(7)(a) Leachate treatment/disposal	<input checked="" type="checkbox"/>	(2) Lift station back-up pumps
<input checked="" type="checkbox"/>	(b) Phased operation	<input checked="" type="checkbox"/>	(3) Collection pipe network (inspection)
<input checked="" type="checkbox"/>	(c) Confined unloading	<input checked="" type="checkbox"/>	(4) Temporary leachate storage
<input checked="" type="checkbox"/>	(d) Separation/control of burning waste	<input checked="" type="checkbox"/>	(5) Leachate treatment and disposal
<input checked="" type="checkbox"/>	(e) Waste disposed at working face	<input checked="" type="checkbox"/>	(6) Leachate storage/disposal contingency plan
<input checked="" type="checkbox"/>	(f)(i) Compacting bulky items	<input checked="" type="checkbox"/>	(7) Surface water monitoring
<input checked="" type="checkbox"/>	(ii) Minimizing dust generation	<input checked="" type="checkbox"/>	(L) PCB and hazardous waste prevention and detection program
<input checked="" type="checkbox"/>	(8)(a) NESHAP reg. asbestos disposal	<input checked="" type="checkbox"/>	(O)(1) Source separated yard waste
<input checked="" type="checkbox"/>	(b) Acceptance of liquids	<input checked="" type="checkbox"/>	(2) Yard waste restriction program
<input checked="" type="checkbox"/>	(c) Acceptance of hazardous waste	3745-37-01 License	
<input checked="" type="checkbox"/>	(d) Acceptance of PCBs	<input checked="" type="checkbox"/>	(A) Valid license

Additional Facility Aspects to Review: Operating Record, Groundwater and Explosive Gas Monitoring, Financial Assurance, and Compliance with Operating License and Authorizing Documents.

Ryan Sendelbach | Ryan Sendelbach | 8-30-10
 Print Name of Inspector Completing Form | Inspector's Signature | Date

Construction & Demolition Debris Facility Inspection Checklist

Facility Name: Crawford County Sanding C&DD Facility ID #: CNDL-27820 Date: 8-27-10 County: Crawford
 Facility Address: 5128 Lincoln Hwy, Pucyras Ohio 44830 Facility Phone #: 419-562-4039
 Operator Name: Gary Adkins Operator Phone #: 419-562-4039
 Corporate Address: 540 25th St, NW Suite 100, Cleveland TN, 37318 Corp. Phone # (if Diff.): 423-476-9160
 Health District: Crawford County Inspector(s): Ryan Sandelbach

Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable to this facility. This checklist is not all inclusive of regulations applicable to C&DD facility operations.

This is a: * **Comprehensive Inspection** Partial Inspection Comments on Back

YES	NO	YES	NO
3745-400-04 Prohibited Disposal Methods		(I) Access to Facility	
<input checked="" type="checkbox"/>	(A)(3) No Open Burning	<input checked="" type="checkbox"/>	(1) Access limited to authorized personnel
3745-400-11 Operation of a Facility		<input checked="" type="checkbox"/>	(2) Exclusion of animals (except for security)
(B) Compliance		<input checked="" type="checkbox"/>	(3) Licensing authority's right of entry
<input checked="" type="checkbox"/>	(2) Placement of debris only in active licensed disposal area	<input checked="" type="checkbox"/>	(4) Maintenance of access roads
<input checked="" type="checkbox"/>	(9) Keeping of daily logs	<input checked="" type="checkbox"/>	(5) Minimize dirt tracked onto public roads
<input checked="" type="checkbox"/>	(11) Properly trained employees	<input checked="" type="checkbox"/>	(6) Post instructions at facility entrance
<input checked="" type="checkbox"/>	(15) Facility shall not cause or allow nuisance or health hazard	<input checked="" type="checkbox"/>	(J) Inclement Weather Preparation
(E) Construction		<input checked="" type="checkbox"/>	(K) No Scavenging
<input checked="" type="checkbox"/>	(1) Maintain & repair engineered components	<input checked="" type="checkbox"/>	(L) Control of Scattered Litter
<input checked="" type="checkbox"/>	(3) Visual barrier (if applicable)	<input checked="" type="checkbox"/>	(M) Adequate Fire Control Equipment
(F) Waste Acceptance		<input checked="" type="checkbox"/>	(O) Leachate Outbreaks
<input checked="" type="checkbox"/>	(1) Don't accept hazardous or infectious waste or containerized bulk liquids	<input checked="" type="checkbox"/>	(1) Contain leachate outbreaks
<input checked="" type="checkbox"/>	(2) Accept solid wastes only as authorized [construction materials packaging, tree parts, NESHAP asbestos (if properly permitted), etc.]	<input checked="" type="checkbox"/>	(2) Manage leachate according to rules
<input checked="" type="checkbox"/>	(3) Designated unloading zones (if no approved pre-screening process)	<input checked="" type="checkbox"/>	(3) Repair area of leachate outbreak
<input checked="" type="checkbox"/>	(a) Zone separate from working face	<input checked="" type="checkbox"/>	(P) Leachate System Management
<input checked="" type="checkbox"/>	(b) Mark limits of unloading zone with at least two temporary markers	<input checked="" type="checkbox"/>	(3) Proper disposal of leachate
<input checked="" type="checkbox"/>	(4) Proper separation of burning materials	<input checked="" type="checkbox"/>	(Q) Surface & Ground Water Management
<input checked="" type="checkbox"/>	(G) Adequate Operating Equipment Available	<input checked="" type="checkbox"/>	(1) Diversion of surface & ground waters
<input checked="" type="checkbox"/>	(H) Operate Facility so as to Prevent Fires	<input checked="" type="checkbox"/>	(2) Proper facility grading
<input checked="" type="checkbox"/>	(1) Cover all combustible debris weekly, or;	<input checked="" type="checkbox"/>	(3) Correction of ponding and erosion
<input checked="" type="checkbox"/>	(2) Prepare and utilize an alternate fire prevention plan. Cover all combustible debris monthly plus another method(s) to prevent fires	<input checked="" type="checkbox"/>	(4) Correction of silting problems
		<input checked="" type="checkbox"/>	(5) Surface water monitoring (if req'd)
		3745-37-01 License	
		<input checked="" type="checkbox"/>	(C) Valid license

Temp. was upper 70's w/ clear sunny sky. A slight breeze was observed coming from the south west.

No C&DD was being unloaded or compacted @ time of inspection.

Ryan Sandelbach Ryan Sandelbach 8-30-10
 Print Name of Inspector Completing Form Inspector's Signature Date
Effective: August 31, 2002

Texas

Mr. Jeff Davis
Team Leader, Waste Permits
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087
(512) 239-6228

When I called Mr. Davis' number at ~11:53am on 01/27/11, I received a message saying the number has been disconnected.

Mr. Guy Moose
Division of Solid Waste Management
Chattanooga State Office Bldg.
Suite 550
540 McCallie Avenue
Chattanooga, TN 37402
(423) 634-5745

I spoke to Mr. Moose about noon on 01/27/2011. He told me that he is aware of about ten (10) counties with landfills run by Santek. He said 2 or 3 of those landfills are in his region of control. He said all are in compliance at this time...that his office inspects each landfill once a month...that "they don't hold back" with regards to enforcement...and if you tell Santek to do something, they do it."

Mr. Moose said he thought Santek opened up in his town...that generally, the counties own the landfills and Santek operates the landfills...and that he has been dealing with Santek for 20-25 years. In reference to a "Bradley County landfill"...I asked Mr. Moose if Santek is good at keeping construction logs and NPDES logs...and he responded by saying, "They're good at everything."

I asked him about any NOV's...and he said, "All the landfills get NOV's", but that his office's aggressive inspection schedule allows Tennessee to "get on top of problems early." He spoke very fast...and was a bit difficult to understand due to the telephone connection...but I think he said Santek has not received an NOV in over a year.

Santek Governmental Contact Information

Bradley County, Tennessee

Mr. Gary Davis, County Mayor
(423) 728-7141

Catoosa County, Georgia

Mike Helton, County Administrator
(706) 965-2500

Crawford County, Ohio

Mr. Mo Ressallat, Commissioner
(419) 562-5876

Crittenden County, Arkansas

Mr. Milton Holt, County Judge
(870) 739-3200

Gordon County, Georgia

Mr. Randall Dowling, County Administrator
(706) 629-3795

Hardin County, Kentucky

Mr. Harry Berry, Judge Executive
(270) 765-2350

Jefferson County, Alabama

David Carrington, Commission President
(205) 325-5503

Loudon County, Tennessee

Mr. Steve Field, Chairman
(865) 576-1057

Louisa County, Virginia

Mr. Richard Havasy, Commission Vice Chair
(540) 894-1023

Murray County, Georgia

Mr. David Ridley, Sole Commissioner
(706) 517-1400 ext. 277

Polk County, Texas

Mr. John Thompson, County Judge
(936) 327-6813

Rhea County, Tennessee

Mr. Ronnie Raper, Chairman
(423) 775-2724

Wake County, North Carolina*

Mr. Johnny Beale, Solid Waste Specialist
(919) 291-7322

Alamance County, North Carolina*

Mr. Greg Thomas, Solid Waste Director
(336) 264-6700

* No Longer Managing Facilities

Santek Governmental Contact Information

Bradley County, Tennessee

Mr. Gary Davis, County Mayor
(423) 728-7141

When I spoke to Mr. Davis, he said that Santek has managed the Bradley County landfill for many years. He feels he has a good contract, but maybe, it could be better. The way his contract is written, it is for the "life of the landfill". He is locked in to that condition as far as not being able to negotiate any amendments. Prior to the current contract, the county had contracts where Santek was "less available."

Mr. Davis said Santek is a "very good company." The county gets a percentage of the fees...customers leave "X" number of bags for "so much"...there is a truck tonnage fee...Santek does everything now and the county "does nothing." Prior to Santek, Bradley County did not accept outside garbage...now they do. He said Santek "gets good inspection reports from the state." He said that the county gets quarterly checks from Santek. "They know what they're doing."

Santek does not operate Bradley County's convenience centers. The convenience centers are for recycling only. In Bradley County, private haulers provide "pick up service to the citizens..." "It's totally an open market."

The county "used to do the landfill" but Santek takes landfill problems "out of the picture." "They market it, and they're good at it." Mr. Davis said he "wouldn't even consider changing" the landfill system in Bradley County. At this time, Mr. Davis said Bradley County has another fifty (50) years life in their landfill. But when he came to the county twelve (12) years ago, the county only had four (4) years of landfill life left. "We are putting money in the bank with Santek."

Again, he said he cannot re-negotiate his contract for "the life of the landfill". He indicated it is likely advisable to have a "contract amendment clause" as part of our agreement. He said that Bradley County probably could be putting more money in the bank from Santek's management if he had a better contract. However, he said that Bradley County's landfill is now a "non-issue."

Mr. Davis said that when he came to the county 12 years ago, he realized quickly the problems his predecessor left him in the landfill. He said that for a year, he spent 90% of his time on landfill problems. He has no problem with the company. Evidently, Bradley County's landfill situation is such a non-issue, he could not tell me even what the user fees were. "Sometimes, I take my truck to the landfill...and maybe it costs me \$4 or \$5."

His advise: "Work out the best agreement for your county. Dicker with them. It depends on how bad they want your landfill."

Catoosa County, Georgia

Mike Helton, County Administrator
(706) 965-2500

Unable to make contact after numerous tries.

Crawford County, Ohio

Mr. Mo Ressallat, Commissioner

(419) 562-5876

(Contact was 01/27/2001) Mr. Ressallat said his county has done business with Santek for a long time. He said the "county was in trouble before". They are a top notch company...they mean what they say...they do a great job. He said Santek has resources that a county cannot have. Operations have taken place about 8 years in the current landfill...and Santek "gets a thumbs up" from him.

Crittenden County, Arkansas

Mr. Milton Holt, County Judge

(870) 739-3200

(Contact was 01/27/2011) I spoke to Mr. Holt at length, and he said that as of October 1, Santek has been in charge of their landfill for three (3) years. Prior to Santek, the county had serious issues with state regulators at their landfill.

Years ago, the landfill began with a father and two sons on a 100 acre tract. Mr. Holt said they were just "good old farm boys" and did a "fairly adequate job." He said with the advent of leachate collection systems, monitor wells, methane regulations and other situations...the family found themselves in a situation "out of their league." To support the "farm operators"...the county began to have to invest heavily in the landfill in order to stay current.

Finally, the county realized they had to get rid of the "good old boys"...and they talked to 4 or 5 companies. Santek rose to the top as they had specialty expertise in working with cities and counties in a "partnership." He said the county did not lost control, but they gained a positive relationship with Santek.

Mr. Holt said that Santek has engineers, lawyers, contractors and other professionals that take good care of his county. He said Santek has extended the life of their landfill by probably 15 years. In general, he said they are good to work with.

Mr. Holt said before Santek, the landfill was a drain on the county's budget...but that Santek has "put money back into the budget." There is a "sanitation fund" funded by a \$1.20 per ton charge that has helped. He said the county has an agreement with Santek to the effect that "when the current landfill is completed, Santek will buy the next tract of land for the next landfill."

He said Santek has "taken the headache out of" his office...has been a big positive change...the landfill looks better than it has in 15 years...problems have been resolved...they are good folks to deal with...they have changed managers 2 or 3 times, but Santek keeps good people. He said that Santek "kept the old employees"...it has been a positive experience...that he had nothing negative to say about Santek.

Gordon County, Georgia

Mr. Randall Dowling, County Administrator

(706) 629-3795

I spoke to Mr. Dowling on 01/28/2011. He was very engaged and began by saying that his county was suffering under the same scenario as Haywood County prior to involvement with Santek. Their landfill is 650 acres in size...and the county had twenty one (21) employees there. However, the county built the landfill and "waited for them to come"...but they averaged only around 75-100 tons per day.

When they decided to seek help, two (2) companies responded. The county owns the landfill and they wanted a good managing company. They issued RFP's, conducted interviews, and visited representative landfills. They chose Santek, and as a contractual condition, Santek was required to keep all 21 of the county's employees...and Santek took all 21. Now, the county does not have that expense, and Mr. Dowling told me that the employees have equivalent pay and slightly better benefits.

In the void of the "landfill liabilities", he said that the county's health insurance quotes "got better".

Santek rents the county's existing equipment for \$25,000 per year...the landfill is open "the same hours"...there are six (6) convenient sites the county had that Santek now manages and "mans"...again, the county owns and Santek manages the sites.

Mr. Dowling told me that citizens pay seven cents (\$.07) per pound to get rid of garbage under Santek...and that they paid five cents (\$.05) per pound under the old county system. Santek has been operating the Gordon County landfill since 2006.

Gordon County receives \$1.42/ton in revenue from Santek...and Santek pays the county \$1.18/cubic yard for closure fees. Mr. Dowling told me that Gordon County receives one million dollars per year (\$1,000,000/yr.) in pure profit from Santek. "We just sit back and receive a million dollars a year." As a sidebar, he said his county's yearly budget is forty five million dollars (\$45,000,000). Mr. Dowling told me that Santek sends Gordon County a check quarterly...and that Gordon County has ~\$8,500,000 in the bank at this time. There are three (3) revenue streams from Santek: 1- The rent of the county's equipment, 2- Usage fees, and 3- Closure fees.

I asked Mr. Dowling if he was able to keep the Commissioners from "raiding" the landfill money, and he said, "Son, that's a sore subject." He said that the \$4,000,000 the county is holding for closure is not touched...but the \$4,500,000 in general revenue from the landfill has been used for non-landfill purposes. He did say though that Gordon County was losing money in the landfill operation prior to Santek's hiring.

Mr. Dowling said that in December of 2010, there were 14,500 tons brought into the Gordon County landfill. Also, in 2010, the average daily tonnage was 686 tons brought in.

Mr. Dowling said that Santek "works well with regulators" ...they are a "great company"... "responsive", and he cannot say anything bad about Santek... "They know what they're doing."

Interesting statistic is: the state has a "rating system" for grading landfill compliance. Prior to Santek's involvement, the state had the county landfill rated at ~75 (out of 100 possible points). Mr. Dowling said that Santek brought the state's rating for the Gordon County landfill up to the range of 95 to 100 points. He said Santek keeps good construction and compliance logs...and Santek is paying for the engineering and construction of a new cell.

With the approximate \$18-\$20 per ton that customers pay, "The public was a little pissed." But, 95% didn't care, and all the noise came from the 5% of the "rebel rousers." The county owns and Santek manages the Gordon County landfill. The life of the landfill has been shortened to 30 years, because Santek is bringing in "outside" trash. He made the point that public complaints of, "The county is giving away the landfill" were there more in the beginning, but most people now know the county owns the landfill.

Mr. Dowling said that in 2005, the county was losing money on the landfill, and getting professional help with the Santek company was "the best thing they've done."

They are "a great company" and "they have never let me down".

Mr. Dowling sent me a copy of their ~50 page contract that does have three (3) amendments attached. He said that Gordon County engaged the services of a landfill specialist attorney from Atlanta at \$300 per hour to help in review of the contract...and that Gordon County also hired a landfill consultant to have input as well. He said prior to Santek, the county spent millions on equipment, repairs, design, construction, etc. and he stated that the Santek people are "professional managers." He said Santek has never missed a deadline, and he cannot say enough good about their company.

In closing, Mr. Dowling said that their original contract with Santek was for twenty (20) years...and his county is satisfied enough with the company that they extended their Santek contract to forty (40) years.

Hardin County, Kentucky

Mr. Harry Berry, Judge Executive

(270) 765-2350

Mr. Berry's endorsement letter is enclosed as an attachment.

Jefferson County, Alabama

David Carrington, Commission President

(205) 325-5503

From Mr. Carrington's office, I was referred to a Commissioner Knight at 205-325-5070. Through a lengthy shuffling from Betsy the secretary...I went to Land Planning and Development at Commissioner Knight's office at 205-325-5070. Then, I was put through to a Mark Bryant at Solid Waste Administration at 205-325-5496, and the secretary did not even know that he no longer works there...then, I went to a "Mr. Kelley". Well...Mr. Kelley turned out to be a Mrs. Tonya Kelley, and she has been at this office since last March. Mrs. Kelley told me that she had been put in charge because her boss went to prison for a bribery conviction...and the assistant director as well was convicted. The conviction stemmed from conditions associated with a sewer line project that is totally unconnected to Santek's landfill operation there.

Mrs. Kelley gave a yes-in-the-positive to all my questions regarding Santek's compliance records, regulator interface, construction logs, and operations in general. Specifically, she said recently Santek got proper signatures and submitted air quality permit requirements on time.

She said she has had 2 or 3 complaints about Santek, because this year they went up on their tipping fees. But...the tipping fees have been the same for the last three (3) years. A Mr. Tim Watts is who she deals with, and they do what she needs. Santek makes payments on time to the county.

They have two landfills in Jefferson County. Landfill #1 is 165 acres in size, and Landfill #2 is 46 acres in size. Mrs. Kelley said the Santek operation runs smooth enough that she doesn't know a lot about it.

In Jefferson County, they have what they call "franchise districts" that are serviced by 4 licensed operators who were juried by the county. They don't pay the county for exclusive rights to service their respective districts...but she said, "They could." These franchise districts are in unincorporated areas. In municipalities, taxes cover the costs of residential pickup. Evidently, the licensed operators have a way to adjust their pickup charges through "fuel surcharges" which she said "fluctuates."

Loudon County, Tennessee

Mr. Steve Field, Chairman
(865) 576-1057

I was unable to reach Mr. Field through numerous tries.

Louisa County, Virginia

Mr. Richard Havasy, Commission Vice Chair
(540) 894-1023

(01/31/2011) Mr. Havasy said Santek came into Louisa County 7 or 8 years ago. Prior to that, the county had a local operator called CTO. He said it was "the worst mistake they made." He said the landfill constantly looked bad...lacked ground cover...trash blowing everywhere...and the roads were bad. Mr. Havasy said it was a political decision to hire the local people and that there were constant environmental problems including NOV's to the landfill.

He said the thinking finally became "getting out front" of the situation, and now, the regulators are more understanding. The county fired the old operator (CTO)...and after Santek began work...in 6 months, things were "totally turned around" at the Louisa County landfill. There is "good grass...no trash blowing around...good roads." Mr. Havasy said the county found that the old contractor wasted a lot of dirt...in some places at the landfill, there would be 4 to 5 feet of dirt between trash layers. Before Santek, the landfill was going to have to close early, but better management of dirt and other resources extended the life of the landfill. He is happy that the "roads are clean." Santek operates the landfill with fewer employees...and they have a supervisor on site all the time. Mr. Havasy said that this is the first time in 10 years that the county does not have a current NOV from the state to deal with.

Mr. Havasy said Louisa County has already "signed for the future" with Santek to handle their landfill operations. They are an "outstanding company to deal with, and Santek is operating the landfill for seven thousand dollars (\$7,000) per month less than the old company (CTO). Mr. Havasy said he visits the landfill about every 2 weeks...it used to be a big eyesore...the state wrote them up for violations concerning appliances containing un-disposed Freon as well as old lawnmowers and old motors containing gas and oil. Now, Santek has installed concrete pads for this type of waste, and they keep them clean and free of the Freon/gas/oil that used to keep the county in trouble with the state.

Mr. Havasy said he always has "easy access" to the company...they are "one of the nicest companies"...they "come once a month to the Commissioner meetings"...the "County Manager gets updates regularly"...and it has been an "amazing turnaround".

The Louisa County landfill is about 100 acres in size and "most of it is not used yet." The old company used to have lots of "construction problems"...and the county "never hears about it now." He said he believes you "live and die by your reputation", and he's been there 6 years. They have 8 re-cycling centers in his county, and Santek takes care of them. The old company used to constantly mismark recycle boxes...IE: A box labeled "glass" was actually "paper." There is no charge to small users, and they are up to 30% recycling in his county now. He did not know what the per-ton charge was.

Mr. Havasy really wanted me to speak to Louisa County's County Attorney...Mr. Dale Mullen at 540-223-3349 and 540-967-0401. Mr. Havasy said that Mr. Mullen was instrumental in negotiating the contract with Santek...and he indicated they were pleased with the results. Mr. Havasy said that for some reason, "most of the county doesn't want the landfill." But the county makes

\$3,000,000 to \$4,000,000 per year on the landfill now. He told me the landfill has 60 to 75 years of life left...and the county is "recycling most of the waste now."

Mr. Havasy said that there is discussion now as to whether to regionalize the landfill (bring in trash from outside Louisa County), and "there is local pushback." The county is "still thinking about it"...and for political reasons he didn't like...he would probably have to vote to not regionalize their landfill. He said the partnership with Santek "creates jobs, promotes recycling, and makes the county money. Waste is a big delima."

Dale Mullins (Louisa County Attorney...01/31/2001) - When I called Mr. Mullins, he was welcoming in his conversation with me. When I inquired about Santek...he said he could answer that "really quick." He "highly recommended" Santek. He said it is the "first time in three years the landfill is compliant." Santek gets "good compaction...1250 - 1300 - 1350 consistently. Mr. Mullins said the county is saving \$12,000 per month over the old operator...and those numbers are: Old operator = \$77,000 per month, and Santek = \$65,000 per month currently. The landfill is "cleaner and more efficient now."

Mr. Mullins sent some e-mails and had his secretary (April Lowe/Purchasing Officer, alowe@louisa.org) contact me to share some reports and other information...(included in the report).

Murray County, Georgia

Mr. David Ridley, Sole Commissioner

(706) 517-1400 ext. 277

Mr. Ridley was contacted on 01/31/2011, and he said he has been there for 2 years. Santek leases their landfill, and he said, "That was the best move at the time." They were spending money before Santek, and now they are making money and saving the taxpayers money. They have "never had a minutes problem with Santek." They have 5 collection sites that are owned, operated and funded by the county, and they spend \$120,000 per at county expense operating the collection sites.

The Murray County landfill is 200 acres in size and has been in operation since ~1996. The citizens are not charged a fee for smaller load such as "household garbage, but larger loads are charged per ton." Santek keeps the recycling fees, and they've been there 2 years. Mr. Ridley said this was the least controversial direction at the time. He said Santek provides his office with copies of all the state reports...and they are good...but they did have one report that was not 100%.

When they hired Santek, the county had some equipment...and they sold some of it to Santek...Santek helped them sell some of it...and they kept some equipment for their public works department. He deals with a Cheryl Dunston...and it's been a "wonderful" setup. He said he would have Dick Barnes (the Erosion Control. person there) to send us some reports.

Polk County, Texas

Mr. John Thompson, County Judge

(936) 327-6813

(01/31/2011) Mr. Thompson is an advisor to the Texas state legislature which is in session, and he did not have a lot of time to talk. When I questioned him regarding his interface with Santek, he said, "That's an easy one." When they were getting ready to enter into a business agreement with Santek, Polk County, "spent a ton of money on a contract." He said, "We've never opened it." The reason why is that he has found that Santek's word is their bond...and he feels, "I don't need a contract with them." Mr. Thompson said he cannot say one thing bad about Santek. He said, "I don't know how I could have been so lucky as to find them." Polk County was struggling with solid waste issues, but since Santek came in 5 or so years ago, there have been "no problems." They have two landfills...one that is 50 acres...and one that is 250 acres. He said he "has a large comfort level with Santek." Santek's handling of the landfill issues have been so smooth, he has not kept up with a lot of the details. Polk County gets a check periodically...they get good inspections...there's been no "noise" since the change...he's "not had a call about the landfill in so long" he can't remember when the last complaint was.

Rhea County, Tennessee

Mr. Ronnie Raper, Chairman

(423) 775-2724

Through a series of "phone shuffling" on 01/31/2011, I wound up talking to a Bill Hollin about Rhea County. He has been on their Commission for sixteen (16) years. Santek has been with Rhea County for 10 or 12 years, and they are into their 2nd or 3rd contract. Mr. Hollin said they are "very happy" with Santek. He said that any landfill will have some complaints...and the biggest one he's had is "dirt on the street". He said that Santek has saved them lots of money..."millions." He said Santek basically gets "good inspections" from the state...they have 2 sections of adjoining landfills...one is ~50 acres and one is ~150 acres. They have monitor wells that Santek looks after...and in Tennessee, they have to have 25 years of monitoring after a landfill is closed. He is "pleased" with Santek. Rhea County does not charge citizens a tipping fee for smaller loads such as "bag trash"...but larger loads "get a charge." Rhea County has six (6) service centers that the county operates with minimum wage employees who get to keep the recycling fees for all that is brought in...the local people handle it...they make money too... "They fight to get the opportunity to operate" a service center.

Wake County, North Carolina*

Mr. Johnny Beale, Solid Waste Specialist

(919) 291-7322

(01/31/2011) Mr. Beale has been with Wake County since 1986. He gets good reports from the state regarding their landfill operations. Santek no longer operates the two landfills they once had in Wake County, but they were there from 1995 until 2008. He said that when the contract ended,

staff recommendations (all the way to the County Manager) were to keep working with Santek...and they were the low bidder. However, another company was awarded the contract, and the owner of that company had just donated forty million dollars (\$40,000,000) to NCSU...the largest private gift that university has received to date. Mr. Beale indicated that the change in companies is not a reflection on Santek.

At one time, their landfills were receiving 600,000 tons of waste per year. Now, it is around 460,000 tons per year. He said that erosion control is a key part of controlling the landfill...and storm water management is "key" as well. Mr. Beale said that Santek "dealt with problems effectively." They are good at maintaining the landfills with erosion control and storm water issues. They had good site managers who were highly skilled...and they had the correct resources to match the operations.

Santek is very safety conscientious, and they put a lot of thought into traffic control. In Wake County, the traffic at the landfill is substantial. Mr. Beale said it is not uncommon for 15 vehicles at a time to be at the work face...mixed from small cars up to tractor trailers. He indicated Santek is good at "routing" traffic very well...and he said they have not experienced any major problems there yet. His experience has been that Santek may separate access areas for safety purposes...and they are good at safety training of their workers.

Mr. Beale told me that before Santek, compaction rates at the landfills came in averaging 1000 pounds. Santek gets compaction up to 1350-1400 pounds routinely now. He is the only person who has said essentially... "Be careful of how compaction is measured...because there are several different ways." He said Santek is easy to work with...they have skilled engineering...saved the county lots of money...they are good with closures. Mr. Beale has administered the solid waste issues there for 13 years, and said the Santek is very competent, good with logs and reports, he has had no NOV's during that time...they are good people. He said he thought Wake County was the first Santek site in North Carolina. As a side bar...Mr. Beale said it has taken Wake County eighteen (18) years to open the South Wake landfill...from 1990 until 2008...took time because of "many lawsuits."

Mr. Beale said that with Santek, compaction increased giving better volume to the landfill...and this has extended time of use. He said Santek "is good at managing resources." He said that now... "gas production is off the charts," and they "are going to add more generators." Even though another company is managing their landfill now, Wake County is still benefitting from Santek's management. He said, "Cheryl Dunson is good with education." The company is good with communication. They do not allow sludge in Wake County's landfill. They "ship it out." They do not allow "out of county waste." They accept 460,000 tons of waste per year now. Nine hundred (900) homes are close by the landfill...\$300,000 to \$400,000 homes...but the landfill has vegetative buffers in place, there are "greenways" and it is very well fenced. The North Wake landfill is 175 acres and the South Wake landfill is 400 acres. He mentioned that they are reclaiming a large borrow area that may be used for a public purpose such as a park. Mr. Beale said, "Employees were treated fairly" and Santek was "easy to deal with."

Alamance County, North Carolina*

Mr. Greg Thomas, Solid Waste Director

(336) 264-6700

(01/31/2011) Note: When I spoke at length to Mr. Thomas, I discerned quickly that he is an extremely motivated and talented landfill operator. He is an excellent communicator...and has had very good support from the local government, and it seemed like Alamance County is progressive

in educating the public, supporting, and in operating their landfill effectively. Essentially, Alamance County felt their guy could compete with Santek...and it seems to be working.

Mr. Thomas has been with Alamance County for "two decades." He told me that the county took their landfill operations back over 5 years ago. He said it was a financial decision, and he is a proponent of government landfills. He said he has achieved Santek's compaction rate...the county had 15 years of "contracting out" the landfill operations...and Santek had the last 5 of those 15 years. Mr. Thomas told me, "Santek performed adequately to contract specifications."

Mr. Thomas said generally, that Santek's compaction rate was around 1250 pounds per cubic yard. He said since the county took the landfill back over that he is now getting around 1500 pounds per cubic yard of compaction. Mr. Thomas said, "That difference will pay for equipment"...and he has just ordered a \$750,000 compactor. Their landfill has a footprint of 90 acres and they are "38 acres into it."

Alamance County has an "enterprise fund" that pays for their landfill operation. All landfill income goes into the enterprise fund...and none of the landfill money goes into the general fund of the county's budget. It is separate. Closing fees are in the enterprise fund, and they have twelve million and two hundred thousand dollars (\$12,200,000) in the account at this time for closing their landfill which is the target number for that purpose. Mr. Thomas told me he "has proactive leaders." Alamance County also has on hand a sum of three million and twelve thousand dollars (\$3,012,000) for remediation fees required by the state. He said all these fees are in interest bearing accounts.

Mr. Thomas said that Alamance County's fees are actually low for that part of the state. Residents pay fifty cents (\$.50) per bag to dispose of household garbage...and larger loads are charged thirty eight dollars (\$38) per ton for disposal fees. He said that Orange County charges fifty dollars (\$50) per ton...and his county residents know it and realize they have a "good deal" with their landfill. Mr. Thomas said that even if Haywood County contracts landfill operations out, there are still going to be issues. "Farming out is not the cure-all." (IE: Closing fees) Alamance County has twenty (20) employees for their landfill and three (3) of those are part-time. He said they always keep six (6) employees at the workface at all times PLUS one superintendant. He said, "Tipping fees have not been raised in years." I got the distinct impression that the mindset is to offer a quality service that makes money...enough to offset costs as well as provide a reasonable financial buffer for the county. I ascertained that the landfill budget is about \$3.5 million dollars per year and the income is about \$3.8 million dollars per year. Alamance County has forty (40) years of life left in their landfill...they have 2 re-cycling convenience centers in the county plus one convenience center at the landfill. Citizens have private haulers pick up re-cycle materials for a cost of \$3.95 per month. Mr. Thomas said that a lot of this information is on Alamance County's web site.

Alamance County contracts with the Buxton Company out of Charlotte to oversee monitor wells, and they provide reports to the state as well as the county. Alamance County staff keeps the NPDES log at the landfill. Their staff is adequate to handle this task. At this point...he said, "I have good Commissioners." They do not have a PE on staff. He said that Santek did a good job, but he feels it is better for the landfill to be "local." When Santek's contract ran out 5 years ago, the county did not have any equipment. Their Board of Commissioners allocated two million and two hundred thousand dollars (\$2,200,00) for equipment purchases. He said one reason Alamance County chose not to renew Santek's contract was because, "Their fees were going to go up a million dollars."

Mr. Thomas said he has not had any NOV's from the state...he works an average of fifty (50) hours per week...and the county offers seven (7) days a week access to the Alamance County landfill. They average 300 tons per day, and it is a combination of residential and commercial trash.

- **No Longer Managing Facilities**

"LAST MINUTE ADDITION"
MP

Catoosa County, Georgia

Mike Helton, County Administrator

(706) 965-2500

Note: This was the only person I spoke with where Santek only operates a transfer station in the county. When Catoosa County's landfill closed, the county hired Santek to move the county's trash to an out-of-county landfill... "somewhere in Alabama" he thought. In Catoosa County, private haulers take trash to the pickup center.

I was finally able to speak with Mr. Helton on 02/02/2011. He said that Santek has been with his county now for 4 or 4 ½ years. He told me that Santek "seems to have done a good job." "They are reliable, trustworthy, and community oriented." The only complaint he has had about the company is the time the transfer station is open. The times open to the public are: Weekdays = 7:30 AM to 3:30 PM...Saturdays are 7:30 AM to 12:30 PM...and the station is closed on Sunday.

"They provide anything we've ever needed. "

"They've always been in compliance."

Santek keeps the recycling funds, and Mr. Helton said the county gets "a small portion of the fees." He was upbeat about Santek working with the county for "special garbage days" such as "clean up your properties" and "community clean up day." For these events, Mr. Helton said Santek was very cooperative by bringing in extra trucks and people to help for the day. He said in essence that Santek's attitude is, "What do we need to do to help out?"

"The head people have been the same," during the time Santek has been in Catoosa County. Mr. Helton was pleased with this aspect of the company's stability.

"They take care of what ever we need to work on."

"You won't be disappointed," with Santek... "Some others do as well"...but he likes Santek.