

MODULE E - 1 MUNICIPAL SOLID WASTE DISPOSAL FACILITY INSPECTION REPORT

TYPE I AND TYPE IV LANDFILL

approximately 20 minutes. During that time period, I observed the gatehouse attendant inspect several incoming loads. One load was rejected for containing household trash.

When Mr. Weiss arrived, I informed him of the complaints and my intent to conduct a site inspection. Mr. Weiss stated that the east side of the landfill was difficult to get to because the roads were too wet to drive through. We first drove to the active working face located on the central east side of the landfill (see attached landfill map, photos 24-25, 41-44). During my previous inspection in December 2017, the active face was located on the north eastern side of the landfill (see attached photos 34-35). Mr. Weiss stated that the active face was moved to the current location due to wet and unstable roads at the other working face. There was 1 spotter and 2 equipment operators working at the active face at the time. I did not observe prohibited waste onsite.

We then walked to the east and north side of the landfill. I inquired about the odor control system (OCS) on the southeast side of the landfill (see attached photo 26). He stated that they are taking a new approach to using the OCS. The methane gas vents will be closed on days that the wind is blowing towards the residents (N/NW wind). In addition, when the wind is blowing away from the surrounding residential properties (S/SE wind), the methane gas vents will be open and the OCS will be turned on. I did not detect odors on site.

Besides a plastic bag, I did not observe windblown litter along the east side of the landfill (see attached photos 27-29). The landfill has an orange plastic fence near the active working face to catch windblown litter (see attached photos 36-37). I observed a bare area on the east side of the landfill (see attached photos 29-30). There was no exposed waste. Mr. Weiss stated that rip rap was put down in that area so that vehicles could drive through when the ditches were regraded. I observed tire marks on the ground. The area has been seeded.

The complainant emailed me a picture of an eroded area along the east side of the landfill. I showed Mr. Weiss the photo so he could help me find the area pictured. We found the area pictured (see attached landfill map). We knew it was the same spot because a large rock in the photo was also present in the eroded area. I confirmed that the erosion of intermediate cover was at least 4 inches deep (see attached photos 31-33). I observed an exposed piece of plastic in the eroded area. TCEQ regulations for landfills require erosion of cover to be repaired within 5 days of detection. Mr. Weiss stated that the erosion happened the weekend prior and was caused by the 2 inches of rain received. I could not confirm a violation at the time of my inspection until I determined when the complainant took the picture once back in the office. I informed Mr. Weiss that the area needed to be repaired within 5 days.

We walked to the northern part of the property to determine if waste was blowing offsite. The northern part of the landfill is used for sand mining. There was no waste filling activities occurring on that side of the property (see attached photos 38-40). I did not observe waste on the northern part of the landfill.

The area that appeared to have brown leaching was no longer present (see attached photos 45-47). I addressed this area of concern during my inspection on May 4, 2017. During that inspection, I observed that red-brown water was pooled in an inactive cell on the south central side of the landfill. The water had no odor. I could not determine where the water was originating from due to tall vegetation in the area. Mr. Weiss stated that the pooled water had been there for about 1.5 years. He stated that the water was sampled and the lab results did not indicate contamination. I also obtained a water sample that day. The results indicated that the water was not contaminated from waste disposal activities (see report in PCS files).

We then drove back to the office where I reviewed the site inspection log, weekly cover log, windblown litter log, and methane reports (see attached inspection log, methane reports, photos 48-58). The inspection log indicates that intermediate cover has been inspected weekly as required in the landfill permit. The weekly cover log did not indicate that erosion of cover was detected and repaired recently. There were no methane gas exceedances reported during the June, September, and December 2017 monitoring events. I reiterated that the erosion of cover needed to be repaired and left the site.

Back at the office, I confirmed that the complainant emailed me the pictures showing the erosion of cover on February 10, 2018 (see attached photos from complainant). The email indicated that the pictures were taken in January 2018 and on February 8, 2018. There was sufficient evidence to indicate that the erosion of cover occurred weeks prior to my inspection and should have been detected sooner. I called Mr. Weiss to inform him that I would issue a violation notice

MODULE E - 1 MUNICIPAL SOLID WASTE DISPOSAL FACILITY INSPECTION REPORT
TYPE I AND TYPE IV LANDFILL

on February 28, 2018.

On March 2, 2018, Mr. Weiss emailed me a picture showing that the erosion of cover was repaired.

Texas Administrative Code Title 30 Chapter 330 Section 330.165(g) states that erosion gullies or washed-out areas deep enough to jeopardize the final or intermediate cover must be repaired within five days of detection by restoring the cover material, grading, compacting, and seeding unless the commission's regional office approves otherwise, based on the extent of the damage requiring more time to repair or the repairs are delayed because of weather conditions. An eroded area is considered to be deep enough to jeopardize the final or intermediate cover if it exceeds four inches in depth as measured from the vertical plane from the erosion feature and the 90-degree intersection of this plane with the horizontal slope face or surface. The date of detection of erosion and date of completion of repairs, including reasons for any delays, must be documented in the cover inspection record required under subsection (h) of this section. The site operating plan must establish a frequency, and identify other occasions, for conducting inspections of the final and intermediate covers to detect the need for repairs. The periodic inspections and restorations are required during the entire operational life and for the post-closure maintenance period.

Greenhouse Road Landfill failed to detect and repair erosion of intermediate cover for at least 2 weeks along the east side of the landfill. The erosion of cover was more than 4 inches deep with exposed waste.