



43207
City of Fort Smith

May 9, 1991

CSN - 66-0226 PERMIT 6188-S
MEDI/ WASTE
SORT: F. COMPLIANCE

Robin Cameron, Inspector
Solid Waste Division
Arkansas Department of Pollution Control & Ecology
P.O. Box 1544
Fort Smith, AR 72903

Dear Mr. Cameron:

The City of Fort Smith (CFS) is in receipt of your letter, dated April 15, 1991, which provided the results of the March 21, 1991 inspection of our landfill, by the Arkansas Department of Pollution Control and Ecology (ADPC&E). The Landfill Inspection and Evaluation indicated that the CFS was not in compliance with several items. The City of Fort Smith realizes that there are some problems at the landfill and intend to correct all of the violations in a timely manner. The CFS has reviewed the violations noted by the ADPC&E and propose the following plan and time schedule for achieving compliance as shown in the attachment to this letter.

The April 15, 1991 letter indicated that the City of Fort Smith will have to submit an application for a permit for the compost area. Mr. Ken Bown of James L. Grant and Associates, Inc. has discussed the permitting of the compost area with Joe Doughty of the Solid Waste Division of ADPC&E. Mr. Doughty acknowledged that the CFS was previously advised a compost permit was not required. However, recently the ADPC&E has begun establishing compost permitting requirements. Mr. Doughty indicated that the CFS should continue to pursue the operation of the compost area with the understanding that submittal of engineering plans and operational data for the compost area would be submitted to ADPC&E in the future.

If you have any questions or would care to meet with the City of Fort Smith landfill representatives, please call me at (501) 784-2353.

Sincerely,

Danny Dye

Danny Dye
Director of Community Services

cc: Suzanne Stair, ADPCE

CORRECTION OF LANDFILL INSPECTION VIOLATIONS PLAN AND SCHEDULE

Section A - Records and Reports

1) Sedimentation pond effluent meets permit limits. - The exceeded permit limits in the Discharge Monitoring Reports may be due to improper sampling procedures. Standard procedures for sampling are being written for landfill employees. The procedures will include the proper procedure for obtaining samples, i.e., sample time, sample location, and also obtaining flow measurement. The CFS proposes to have these procedures in place by July 1, 1991.

Section B - Construction

1) Migration of fill as designed and 2) Trench or area fill is properly oriented as designed. - The CFS hired James L. Grant and Associates, Inc./Mickle, Wagner & Coleman, Inc. (JLGA/MWC) to among other things, address the compliance problems at the landfill. The existing contours (as-built) for the landfill have already been determined by aerial mapping. Fill sequencing is being determined and cross sections are being drawn of the existing and the final permitted contours. In addition, JLGA/MWC are providing the CFS with a series of final grade stakes so that landfill operations will be able to fill the landfill to the permitted elevations. The CFS proposes to have a draft of the proposed plans to the ADPC&E by June 1, 1991.

3) Fill material properly stockpiled - The CFS is planning to use the northeast portion of the landfill as a wet-weather area. A diversion ditch has been excavated in the proposed wet-weather area to control the surface water. The existing contours in the wet-weather

area have been determined and the proposed layout has been drawn. An all weather road and all weather working deck, in which trucks traverse and unload, will be prepared. In addition, fill material will be placed at the proper locations in the wet-weather area. The CFS plans to have the wet weather area in service by June 1, 1991.

4) Satisfactory site access control - The landfill hours are 5:30 AM to 4:30 PM. The CFS will be notifying all haulers to be sure they are aware of the hours of landfill operation. Beginning June 1, 1991 the gate will be locked after 4:30 PM and a gate attendant will be on duty at the landfill. In addition, signs will be installed at the landfill entrance and other locations, to assure that the hours of operation and site access control is strictly enforced.

5) Satisfactory cover on closed areas. - The areas in which final fill elevations have been obtained at the landfill are presently being determined. Proper cover material and topsoil to support vegetation will be provided in the areas determined to be at final permit elevation. Final cover sequences and a vegetative cover plan are to be included in the June 1, 1991 submittal to the ADPC&E.

6) Measures adequate for litter control - The CFS has already taken steps to control the litter at the landfill. Following the March 21, 1991 inspection, a smaller work area has been utilized. In addition a residential area has been designated, near the entrance to the landfill, to keep the large number of low-volume vehicles off the landfill working area. This allows the operators to maintain a smaller work area and better control the litter. The residential area is designed to allow pick-up trucks, containing small loads of waste and/or appliances, to drive up and on to the residential pad and unload their waste. Roll-off containers are provided for appliances, general solid waste, and

heavy metal. Some of this waste is recycled and the remainder is taken to the landfill as necessary. The CFS also plans to install additional litter fencing and utilize work release prisoners to police the landfill and surrounding area.

Section C - Waste Handling Operations

1) Required personnel present - The CFS has been using at least one spotter at the landfill working area, since the March 21, 1991 inspection. The spotter is instructed to maintain an area approximately 125' wide by 125' long for filling. The spotter stops the vehicle, inspects the load, and instructs the driver on the location to dump. The CFS will continue to utilize a spotter at the working area of the landfill.

2) Waste confined to a manageable area - Following the March 21, 1991 inspection the CFS has reduced the size of the working area. The use of a spotter on the working area instructing drivers when and the location to drop loads has helped. In addition, the CFS has reduced the size of the working area by creating a residential area, in which pick-up trucks can dump waste. This allows the landfill working area to receive only the larger trucks and therefore reduce the open waste area.

3) Proper compaction of waste. - The CFS is providing the best compaction possible with the equipment at the facility. There are three compactors at the site. However, maintenance problems have allowed only one or two of the compactors to be operated continuously. In the future, the CFS will strive to provide the best compaction that is possible. The two compactors are coordinating to work waste against the waste slope and at right angles to each other.

4) Daily cover applied. - The CFS will try to maintain at least one compactor on the working area at all times (normally there are two). In addition, the working area will be maintained at the minimum size possible. This is now part of CFS standard operating procedure and will continue in the future.

5) Leachate collection & disposal method adequate. - The areas that are stained and appear to be generating leachate will be noted and an adequate clay cover material will be provided to control obvious leachate drainage. The areas will be inspected weekly for leachate generation. If leachate generation continues, in the areas previously noted, the CFS will provide additional maintenance to control the leachate and/or design a leachate collection system. The CFS will identify, repair, and begin weekly inspection of obvious leachate generation areas by June 1, 1991. Final cover operations should cut off the recharge for these areas on a long term basis.

Section D - Problem Indicators

1) Leachate or evidence of leachate - As indicated in Section C, item 5, the CFS will identify, repair, and begin weekly inspection of the obvious leachate generation areas by June 1, 1991.

2) Vegetative cover inadequate or not maintained, and 3) Stressed or dead vegetation. The CFS is proposing to identify all areas of inadequate cover, dead vegetation, and areas requiring vegetation. The CFS Street Department and/or contract labor and equipment will be utilized to haul and spread cover material and topsoil to the previously identified areas. Fertilizer and native grass seeds will be selected and the identified areas will be seeded. The areas will be identified, materials ordered, and necessary labor and equipment chosen by June 1, 1991. During the first two weeks of

June, 1991, the identified areas will be repaired, covered with topsoil, and seeded. Depending upon soil moisture conditions, water may have to be applied to the seeded areas.

4) Erosion on closed areas - Erosion on all closed area slopes will be identified by June 1, 1991 and will be repaired in conjunction with revegetation tasks described in Section D, items 2 & 3. Erosion areas will be repaired by June 15, 1991.

5) Vectors or evidence of vectors - The CFS believes the combination of reduction in the size of the working face, repair of eroded areas, and maintenance of the existing soil cover, will reduce the bird population at the site. These tasks will be completed by June 15, 1991.

6) Visible (heavy) litter on site - A smaller working face is now being maintained and will continue. Additional litter fences will be erected and work release personnel will be utilized to police the litter in the vicinity of the landfill. Visible litter will be removed from the site by June 15, 1991.