

Loudon County Solid Waste Disposal Commission  
Workshop  
January 9<sup>th</sup>, 2025  
5:00PM  
Loudon County Office Building

Public Comment

LCSWDC:

- Part II Update
- Republic Report
- Persistent road and litter debris violations by Santek/Republic of the contract, discuss background with proposed actions.
- 2025 Meeting Dates

Action Items

Adjourn



January 6, 2025

Adam Waller  
Chairman  
Loudon Landfill Commission  
100 River Road  
Loudon, TN 37774

Chairman Waller:

Please find the following information and request for you and the Landfill Commission:

- We are aware that a Loudon individual has been emailing photos to TDEC for the past period. Regarding the photos sent yesterday, Sunday 1-5-2025, please see our response and photos, attached. The gate was locked at noon on Saturday the 4<sup>th</sup> and reopened this morning.
- As has been said previously, the situation we are currently in, both Republic Services and the Loudon Landfill Commission, is a result of inaction of the previous Loudon Landfill Commission. Once the Expansion Permit is executed construction will begin. The new cell will be open as soon as possible.
- As requested, please find the Corrective Action Plan dated December 2024.

Thank you in advance and please do not hesitate to email or call with questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Hollinshead".

David L. Hollinshead  
Manager Municipal Sales  
Republic Services

Cc: Holly Van Kirk; Environmental Manager  
Teresa Fox; Landfill Manager

Attachment (s)

## Hollinshead, David

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**From:** Fox, Teresa  
**Sent:** Monday, January 6, 2025 8:47 AM  
**To:** Hollinshead, David  
**Cc:** Van Kirk, Holly  
**Subject:** Road  
**Attachments:** TC\_00227.jpeg; TC\_00226.jpeg; TC\_00225.jpeg

Good morning David,

Attached are pictures of the road from earlier this morning. It did rain overnight but we were in early to prep the road and pads with rock. I'm not sure where the track out on the road came from Sunday afternoon but it was dry and hadn't rained yet when we locked the gates Saturday.

### **Teresa Fox**

Operations Manager  
Matlock Bend Landfill  
21712 Hwy 72 North  
Loudon, TN 37774  
e TFox@republicservices.com  
c 260-267-4977  
w RepublicServices.com



Sustainability in Action

Jan 6, 2025 at 8:14:12 AM  
21128-21300 SR-72  
Loudon TN 37774  
United States



Jan 6, 2025 at 8:14:03 AM  
21128-21300 SR-72  
Loudon TN 37774  
United States



Jan 6, 2025 at 8:13:44 AM  
21128-21300 SR-72  
Loudon TN 37774  
United States



# CORRECTIVE ACTION PLAN

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## LOUDON COUNTY (MATLOCK BEND) LANDFILL

NPDES PERMIT TRACKING NO. TNR051889

DECEMBER 2024



**REPUBLIC**  
**SERVICES**

© Republic Services, Inc. (2024)

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## 1. BACKGROUND

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Matlock Bend Landfill is located at 21712 Highway 72 North, Loudon, TN 37774 in Loudon County, Tennessee. The facility currently operates under Solid Waste Permit No. SNL 53-103-0203 and is permitted to discharge stormwater associated with industrial activities under the Tennessee Stormwater Multi-Sector General Permit for Industrial Activities No. TNR051889. There are currently three (3) outfalls that discharge stormwater associated with industrial activities.

On November 22, 2024, a Notice of Violation (NOV) was issued by the Tennessee Department of Environment and Conservation (TDEC) to Republic Services, Inc. dba Loudon County (Matlock Bend Landfill). The NOV stipulates certain actions to be taken at Matlock Bend Landfill in regard to alleged violations.

The NOV stipulates that a Corrective Action Plan was to be received by the Department by December 2, 2024; however, the Department verbally granted the site a 30-day extension (January 1, 2025), with the condition that a summary letter of the best management practices implemented at the facility was submitted to the Department. The summary letter was submitted on December 5, 2024 and is provided in Appendix B. The corrective action plan must contain a description of the steps that have been taken and/or are being taken to correct the stated violations and a schedule for corrective action implementation.

Specifically, the NOV states that the corrective action plan should address the reoccurring and insufficient treatment of stormwater, which has resulted in discharge of sediment off-site during rain events. The Department requests an alternative, preventative method be implemented, and stated that the current method of riprap and street sweeping is inadequate. Corrective actions are summarized in the list below:

1. Currently Implemented Corrective Actions and Best Management Practices
2. Incorporating Flocculants into Wheel Wash Operations
3. Increasing Routine Inspections and Maintenance Frequency of Wheel Wash
4. Rerouting Trucks Hauling Cover Soil to Back Haul Roads
5. Installation of Mud Mats (or an equivalent control)
6. Blading the Top Deck Haul Road

Each of these items are individually addressed in Section 3 alone with the description of the steps that have been taken and/or are being taken to correct the alleged violations is included. A schedule for corrective action implementation has been included in Section 4.

## 2. CORRECTIVE ACTIONS

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### 1. Currently Implemented Corrective Actions and Best Management Practices

The mitigation of sediment runoff from the facility is managed through its Best Management Practices (BMP) Plan. BMPs currently implemented and maintained by Matlock Bend Landfill to mitigate sediment track-out were provided in the December 5, 2024 summary letter and are also listed below:

- The facility has modified operations so that haul trucks are limited to driving on tipping pads temporarily stabilized with rock.
- Rock is refreshed along the haul road as needed, and a minimum of 2 loads of rock are maintained on-site. When a rain event is anticipated, the facility maintains a stockpile of 3-4 loads of rock for immediate deployment when necessary.
- The facility scarifies the rock along the haul road at least daily to maintain rock effectiveness.
- The facility sweeps the road at a minimum of once every two hours, and more frequently during rain events as needed.
- The manufacturer of the Wheel Wash conducted an inspection and routine maintenance in April 2023. The Wheel Wash is cleaned every other month, and more frequently during wet months as needed (to be increased to monthly as part of Corrective Action 3 listed below).
- When necessary, during rain events, trucks are pressure washed after the wheel wash, if sediment is still observed on the tires/undercarriage.
- A concrete barrier has been installed to minimize the occurrence of trucks driving in the grassed area of the outbound lane near the entrance/exit of the Landfill/Hwy 72.
- Disturbed areas are kept vegetated along the haul road to minimize the amount of sediment getting onto the outbound portion of the interior haul road.

### 2. Incorporating Flocculants into Wheel Wash Operations

In order to further mitigate offsite tracking, Matlock Bend Landfill proposes to incorporate flocculants into the operation of the wheel wash in order to enhance removal of suspended solids from the wash water.

If tires require cleaning, vehicles are required to pass through the wheel wash after disposing of their load and prior to exiting the facility. The wheel wash system is self-contained, and no water is allowed to discharge from this system. Flocculants are expected to improve the effectiveness of the wheel wash system and mitigate suspended solids. Flocculants will be added in accordance with the manufacturer's specifications. Any solids that accumulate within this system are removed and disposed of properly. Any liquid that is required to be removed will be disposed of at a proper disposal facility. At no point is liquid from the wheel wash system allowed to discharge through the stormwater drainage system.

**3. Increasing Routine Inspection and Maintenance Frequency of existing Wheel Wash**

In order to monitor the effectiveness of the wheel wash system, the facility will conduct routine inspections of the wheel wash system monthly (Appendix D). The facility will inspect the system to ensure the system is functioning effectively, that accumulated solids are removed, and that the wash water is refreshed, as needed. Routine maintenance includes removing and properly disposing of any solids that accumulate in this system. Any liquid that is required to be removed will be disposed of at a proper disposal facility.

**4. Rerouting Trucks Hauling Cover Soil to Back Haul Roads**

In order to further mitigate offsite tracking, Matlock Bend Landfill proposes to reroute internal trucks hauling cover soil onto back haul roads. Routing trucks away from the main haul road will reduce the amount of sediment tracked towards the facility exit and prolong the lifespan of the stone on the main haul road.

**5. Installation of Mud Mats (or an equivalent control)**

In order to further mitigate offsite tracking, Matlock Bend Landfill proposes to install Mud Mats, or an equivalent control. This control measure is designed to aid in the removal of mud and sediment from vehicle tires and serve as a bridge in soft soil areas. The Mats will be routinely inspected and maintained per the manufacturer's recommendation, or more frequently if deemed necessary.

**6. Blading the Top Deck Haul Road**

Matlock Bend Landfill proposes to routinely blade the top deck haul road in order to maintain a hard surface for trucks to drive on in locations that are deemed necessary. Maintaining a hard surface for trucks to drive on should minimize the displacement of soil particles and reduce the amount of sediment clinging to tires.

### **3. SCHEDULE FOR CORRECTIVE ACTION IMPLEMENTATION**

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As discussed in the previous section, the majority of corrective actions have already been completed. Therefore, only the remaining to be completed corrective action items are included in this schedule for Corrective Action Implementation.

**1. Currently Implemented Corrective Actions and Best Management Practices**

Implemented corrective actions and BMPs will continue on a routine schedule as mentioned in Section 3.

**2. Incorporating Flocculants into Wheel Wash Operations**

The incorporation of flocculants into the wheel wash system will begin within 30 days of the date of this Corrective Action Plan.

**3. Increasing Routine Inspection and Maintenance Frequency**

The increased wheel wash inspection and maintenance frequency will be initiated within 30 days of the date of this Corrective Action Plan.

**4. Rerouting Trucks Hauling Cover Soil to Back Haul Roads**

The proposed route changes will be implemented within 30 days of the date of this Corrective Action Plan.

**5. Installation of Mud Mats (or an equivalent control)**

The installation, maintenance, and inspection of Mud Mats, or an equivalent control, will be completed within 30 days of the date of this Corrective Action Plan.

**6. Blading the Top Deck Haul Road**

The proposed blading of the top deck haul road will be implemented immediately and conducted routinely as needed.

## APPENDIX

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- A. November 22, 2024 – Notice of Violation
- B. December 5, 2024 – BMP Summary Letter to Mr. Michael Atchley
- C. Drainage Area Map
- D. Corrective Action Monthly Inspection

**A. NOVEMBER 22, 2024 – NOTICE OF VIOLATION**

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STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

Knoxville Environmental Field Office  
3711 Middlebrook Pike  
Knoxville, TN 37921  
Phone 865-594-6035 Statewide 1-888-891-8332 Fax 865-594-6105

November 22, 2024

**CERTIFIED MAIL RETURN**  
**RECEIPT # 9489 0090 0027 6662 7970 87**

Ms. Teresa Fox, Facility Contact  
Republic Services, Inc., dba Loudon County (Matlock Bend Landfill)  
Matlock Bend Landfill  
100 River Road #106  
Loudon, TN 37774

RE: **Notice of Violation**  
NPDES Permit Tracking #TNR051889  
Republic Services, Inc. dba Loudon County (Matlock Bend) Landfill  
21712 Highway 72  
Loudon County, Tennessee

Dear Ms. Fox:

On November 20th, 2024, Madeline Vicars and Valerie McFall with the Tennessee Department of Environment and Conservation, Division of Water Resources (the Division) conducted a complaint investigation of the above referenced property. The complaint was received by the Division of Solid Waste on November 14<sup>th</sup> and referred to Division of Water Resources. The complaint concerned sediment being tracked onto Highway 72, causing a threat to public safety as well as the unnamed tributary across the road.

You have been authorized to discharge stormwater associated with sanitary landfills/disposal activities for the Matlock Bend Landfill under the Tennessee Multi-Sector Permit (TMSP), tracking number TNR#051889. During the investigation it was noted that the reoccurring and insufficient treatment of stormwater has resulted in discharge of sediment off-site during rain events, an issue of noncompliance with the terms and conditions of the TMSP and potential threat to water quality (See Photo Log). The discharge of untreated stormwater into streams can impair the stream and its designated uses, including the support of fish and aquatic life, livestock and wildlife, recreation, and irrigation. Discharging sediment into waters of the state is a violation of the *Tennessee Water Quality Control Act of 1977*.

The landfill's Highway 72 entrance/exit experiences high levels of traffic coming in and out of the landfill itself and passing through. The Division requests an alternative, preventative method be implemented, as the method currently in place (riprap and sweeping) has proven inadequate. A permanent solution is needed, rather than a response. Sediment should be addressed and treated prior to ever leaving the site rather than cleaned once it's already been tracked out. In addition,

washing any tracked mud into the nearby tributary is not acceptable and as stated above, a violation of the *Tennessee Water Quality Control Act of 1977*.

Plan to submit a list of permanent treatment options to the Division by Monday, December 2<sup>nd</sup>. The Division will then review the options and accept a plan moving forward. Once a treatment option or combination of treatments has been accepted, a timeframe to have these measures implemented by will be requested. Until the permanent solution is in place, any sediment tracked into the roadway should immediately be cleaned off and gravel should be refreshed to prevent water quality issues as much as possible.

Your quick attention to these matters is greatly appreciated. You may contact Madeline Vicars at (865) 203-5062 or [Madeline.Vicars@tn.gov](mailto:Madeline.Vicars@tn.gov) with your list of options or any questions.

Sincerely,



Michael Atchley, Environmental Program Manager  
Division of Water Resources  
Knoxville Field Office

cc : File : County : TNR051889  
Enforcement and Compliance Unit, Nashville (e-copy)



Matlock Bend Landfill TNR051889  
Madeline Vicars and Valerie McFall  
11/20/2024



Division of Water Resources (DWR) was forwarded a complaint from the Division of Solid Waste on 11/15/2024 regarding sediment in the roadways and concern about impacts to the tributary located across Highway 72. On 11/20/2024, Madeline Vicars and Valerie McFall with DWR conducted an investigation.



During the investigation, sweepers were seen actively clearing mud off the roadways. Sediment was also observed accumulating around the entrance/exit and staining was observed across Highway 72. This issue is noted to be ongoing. A preventative solution is needed to remove any material on tires prior to leaving the site. Consistent tracking of mud can potentially cause a condition of pollution in Waters of the State, a violation of the *Water Quality Control Act of 1977*.

**B. DECEMBER 5, 2024 – BMP SUMMARY LETTER TO MR. MICHAEL  
ATCHLEY**

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## Sustainability in Action

December 5, 2024

Michael Atchley  
Environmental Program Manager  
Knoxville Environmental Field Office  
Division of Water Resources  
3711 Middlebrook Pike  
Knoxville, TN 37921

RE: Matlock Bend Landfill  
TNR051889  
Notice of Violation Response

To whom it may concern:

This letter provides a summary of the sediment track-out mitigation measures currently implemented at Matlock Bend Landfill. Additionally, the Facility will submit a formal Corrective Action Plan in response to the Notice of Violation (NOV) received on November 22, 2024, for Matlock Bend Landfill (TNR051889). An extension of 30 days for the submission of the formal Corrective Action Plan has been granted by TDEC, and the facility is committed to ensuring its submission within the specified timeframe.

BMPs currently implemented and maintained by Matlock Bend Landfill to mitigate sediment track-out- are listed below.

- The facility has modified operations so that haul trucks are limited to driving on tipping pads temporarily stabilized with rock.
- Rock is refreshed along the haul road as needed, and a minimum of 2 loads of rock are maintained on-site. When a rain event is anticipated, the facility maintains a stockpile of 3-4 loads of rock for immediate deployment when necessary.
- The facility scarifies the rock along the haul road at least daily to maintain rock effectiveness.
- The facility sweeps the road at a minimum of once every two hours, and more frequently during rain events as needed.



## Sustainability in Action

- The manufacturer of the Wheel Wash conducted an inspection and routine maintenance in April 2023. The Wheel Wash is cleaned every other month, and more frequently during wet months as needed.
- When necessary, during rain events, trucks are pressure washed after the wheel wash, if sediment is still observed on the tires/undercarriage.
- A concrete barrier has been installed to minimize the occurrence of trucks driving in the grassed area of the outbound lane near the entrance/exit of the Landfill/Hwy 72.
- Disturbed areas are kept vegetated along the haul road to minimize the amount of sediment getting onto the outbound portion of the interior haul road.

Should you require additional information or have any questions or comments, please contact me via email at [hvankirk@republicservices.com](mailto:hvankirk@republicservices.com) or by phone at (615) 956-9277.

Sincerely,

A handwritten signature in cursive script that reads "Holly Van Kirk".

Holly Van Kirk  
Environmental Manager  
Republic Services

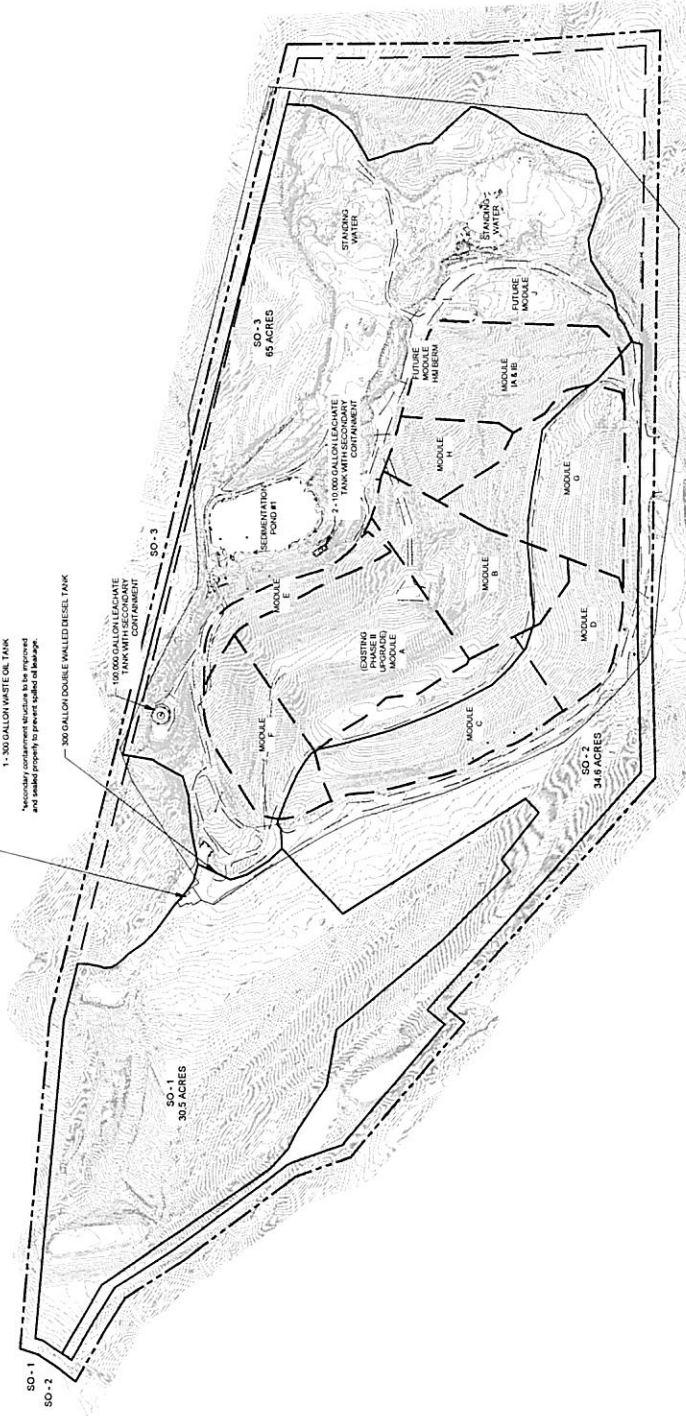
cc: Operating Record (Hard Copy and Electronic)  
Mike Classen (Electronic)  
Adam Waller (Electronic)  
David Hollinshead (Electronic)  
Robert Heller, HHNT (Electronic)

**C. DRAINAGE AREA MAP**

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- MAINTENANCE POND  
 4 - 55 GALLON DRUMS  
 1 - 2000 GALLON DOUBLE WALLED DIESEL TANK  
 1 - 500 GALLON HYDRAULIC FLUID TANK  
 1 - 500 GALLON HYDRAULIC FLUID TANK  
 1 - 300 GALLON WASTE OIL TANK
- \*Secondary containment structure to be improved and sealed properly to prevent spilled oil leakage.



**GENERAL NOTES**

1. THE MAIN SERVICE COURSES OF THE 2024 AERIAL TOPOGRAPHIC SURVEY BY SOUTHERN RESOURCE MAPPING CO. DATED APRIL 2, 2024.
2. ALL TOPOGRAPHIC DATA SHOWN TO THE SOUTH OF THE MAINTENANCE POND AND TO THE LEFT OF THE MAIN ACCESS ROAD IS FROM THE 1996 PERMIT DRAWINGS BY SANTEK ENVIRONMENTAL, INC.



<b>SITE MAP</b>	
<b>STORM WATER POLLUTION PREVENTION PLAN</b>	
<b>MATLOCK BEND CLASS I LANDFILL</b>	
FOR <b>SANTEK WASTE SERVICES, LLC</b> COLUMBIAN COUNTY, INDIANAPOLIS	
<b>HHNT</b>	
HARRIS, HERRIN, NEUBERRY & TIBBELL, INC. Consulting Engineers 1000 JAMES HARRIS RD MAYESVILLE, INDIANAPOLIS, IN 46163 TEL: (317) 251-1234 FAX: (317) 251-1235	
PROJECT NO.	6703-1095-01
SCALE	1" = 200'
DATE	NOVEMBER 2021
	SHEET 1 OF 1

**D. CORRECTIVE ACTION MONTHLY INSPECTION**

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## CAP BMP MONTHLY INSPECTION

Inspection Date:		
	Functioning Properly? (Y/N)	Notes
<b>Incorporating Flocculants into Wheel Wash Operations</b>		
<i>Is the wheel wash operational?</i>		
<i>Is the water used by the wheel wash in an acceptable condition?</i>		
<i>Are flocculants being utilized in the wheel wash?</i>		
<b>Increasing Routine Inspections and Maintenance Frequency of Wheel Wash</b>		
<i>Are monthly inspections and maintenance of wheel wash being conducted?</i>		
<b>Installation of Mud Mats (or an equivalent control)</b>		
<i>Are Mud Mats installed per detail?</i>		
<i>Are Mud Mats maintained and functioning properly?</i>		

Inspector's Name: \_\_\_\_\_

Signature: \_\_\_\_\_



**LOUDON COUNTY SOLID WASTE DISPOSAL COMMISSION  
2025 Loudon County Meeting Dates**

**DRAFT**

<b>LCSWD Commission Meetings</b>	<b>LCSWD Workshop Meetings</b>
January 16 <sup>th</sup> (Thursday)	January 9 <sup>th</sup> (Thursday)
February 20 <sup>th</sup>	
March 20 <sup>th</sup>	
April 17 <sup>th</sup>	April 10 <sup>th</sup> (if necessary)
May 15 <sup>th</sup>	
June 19 <sup>th</sup>	
July 17 <sup>th</sup>	
August 21 <sup>st</sup>	August 14 <sup>th</sup> (if necessary)
September 18 <sup>th</sup>	
October 16 <sup>th</sup>	
November 20 <sup>th</sup>	November 13 <sup>th</sup> (if necessary)
December 18 <sup>th</sup>	
**Regular Meetings are at 6PM at Courthouse Annex 101 Mulberry St., Loudon**	**Workshops are at 4PM at County Office Bldg 100 River Rd., Loudon** <b>NOTE: Workshop Meetings are not mandatory and will be called by LCSWDC on a month-to-month basis when deemed necessary.</b>

**\*\*LCSWD Commission Meeting Agendas are posted at [Welcome to the official website of Loudon County, Tennessee Government! \(loudoncounty-tn.gov\)](https://www.loudoncounty-tn.gov) prior to meeting\*\***