

TOWN HALL EAST, INC
P.O. BOX 14259
KNOXVILLE, TN 37914

August 6, 2009

Mr. Mike Apple, Director
Division of Solid Waste Management
5th Floor, L&C Tower
401 Church Street
Nashville, TN 37423-1535

Re: Application of C&D Landfill, LLC to expand its landfill on Delrose Drive,
Knoxville, TN – DML # 47-0011— July 14, 2009 Public Notice of Intent to Issue Permit

Dear Mr. Apple:

Town Hall East, Inc. (THE) is a community organization that represents hundreds of families and residents in East Knoxville. Residents are concerned about the plans proposed for C & D Landfill located at 3400 Delrose Drive in Knoxville, TN. Pursuant to your Public Notice, we hereby request that TDEC schedule a public hearing on this matter. We ask that this hearing will held in a school auditorium or other public meeting facility in the area so that information about the project and its impacts can be explored and our questions and concerns be addressed. We also request that no action be taken on the permit application until these issues are resolved.

We have examined the application of C & D Landfill, and we are concerned that the facility would continue to operate for an additional 15 years. This would double the waste stored at this site adding five million cubic yards of waste to the mound. The company's drawings show that it will further deface the scenic ridgeline by raising its trash mound 90 feet to 140 feet above the existing ridgeline. The blighted area will be grassed (assuming grass grows there) but no trees will be added because they might puncture the clay cap. The visual impact to this ridgeline will be devastating to the residents and to the adjacent Holston River Park, a heavily used 44-acre recreation facility that isn't mentioned in C & D's application and papers.

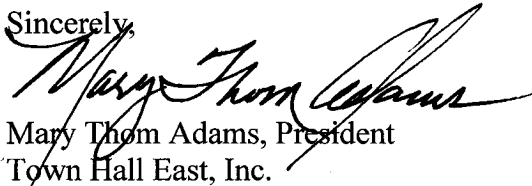
The expansion application notes that the Tennessee River is 1 ¼ miles from the site. However the Holston River, only a stone's throw away from the site, is not mentioned. It would be disastrous if this landfill polluted the Holston River. Not only is a precious river at risk, but C & D Landfill is upstream--approximately a mile--from the city of Knoxville's Riverside Drive water treatment plant that supplies water to a city of nearly 300,000 people. Also potentially at risk are the families whose wells are in close proximity to the landfill. What is the impact on these wells? Has the water been tested? How much weight or pressure can be put on a mountain of compressed waste before discharges and effluents penetrate fissures in the underlying rock? The documents on file at TDEC treat this as an ordinary engineered landfill on which the top cap avoids future water intrusion, yet this practice ignores the existence of the prior quarry operations that have penetrated other hydrologic layers below.

At the public hearing, we want TDEC and the applicant to explain:

- What will be the environmental impact on this community—on wells, on water quality (both contact and drinking), on air pollution, on precious visual resources and the surrounding land?
- What are the constituent wastes--tars, asphalt, metals, chemical treatments from discarded wood, etc? Can those chemicals leach into soil?
- What is at the bottom of the pile and what is its condition? Did blasting from the old marble quarry crack and fissure the bedrock? This area is generally known for limestone/ karst formations that often have solutions channels. Was this figured into the equation?
- How do you evaluate desecration of our tree ridgeline?
- How will oversight be maintained into the future? What happens to the landfill when this limited liability company's two-year post-operation monitoring period ends? Are there personal guarantees if the mess requires cleanup?
- Do the three monitoring wells only test flow from the new mound as opposed to the lower mined-out reaches of this trash monolith? What lower aquifers are being tested? Are wastes moving there through horizontal flows?
- How will the increased truck traffic affect an already overburdened road system? The application states 200 large trucks (35 cu yds) will be using our roads 50 weeks a year for the next 15 years. This massive addition further pollutes and over taxes our roads—contributing to the communal cost of rutted street—and may route traffic through residential roads.

We live in a wonderful part of Knoxville. We want it protected and the land use carefully considered. We need assurance that our environment is safe and healthy for residents now and into the future. We look forward to hearing from you regarding this matter.

Sincerely,



Mary Thom Adams, President
Town Hall East, Inc.

CC: Governor Phil Bredesen
Senator Jamie Woodson
Representative Joe Armstrong
Mayor Bill Haslam
Mayor Mike Ragsdale
Commissioner Tank Strickland and Sam McKenzie
Councilmen Rob Frost and Bob Booker
EPA Region VI, Atlanta