



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

Mr. Kevin O' Brien
Waste Corporation of Missouri
2120 West Bennett
Springfield, MO 65807

Ref: Central Missouri Landfill, Inc. -- Permit Number 0115906

Dear Mr. O' Brien:

The Solid Waste Management Program (SWMP) recently received the final audit for the Central Missouri Landfill, Inc. conducted by the Department of Natural Resources, Internal Audit Program on June 20, 2007. A copy of that report is enclosed for your action.

We have reviewed the findings made by the auditor and the landfill's responses to those findings. We have prepared a list of actions (enclosed) that we recommend be taken to correct areas of non-compliance identified in the audit report. Our recommended actions are addressed in the same order as the issues in the auditor's report. I would like to point out that the findings in this report are based upon Section 260.330, RSMo and 10 CSR 80-2.080 which govern landfill tonnage fees and outline the established procedures for recording all waste accepted at a sanitary landfill.

Your response to our recommended actions should be submitted in writing to the SWMP within 60 days of this letter's date. We will be able to review your response more quickly if you follow the same order as the list of recommended actions.

The audit process including recommendations to reach resolution is one tool we use to fulfill our responsibility to fully account for tonnage fees due the state. We are committed to working cooperatively with you to address the audit issues and view the audit process as a constructive method of evaluating your permitted facility's procedures to ensure compliance and identify areas that might require your attention.

After SWMP receives your written comments regarding the recommended actions, if needed a meeting or teleconference with facility staff and SWMP personnel can be scheduled to reach a final resolution of the audit findings. The meeting date would be set based on availability of all participants.

Mr. Kevin O' Brien
Page Two

Please do not hesitate to contact Ms. Brenda Ardrey or Ms. Raechell Henley at (573) 751-5401 or by mail at P.O. Box 176, Jefferson City, Missouri, 65102, if you have any questions or require further clarification. Thank you for your cooperation and assistance in this effort.

Sincerely,

SOLID WASTE MANAGEMENT PROGRAM



Jim Hull
Director

JH:bak

Enclosure

- c: Mr. Daniel R. Schuette, Director, Division of Environmental Quality
- Ms. LaVerne Brondel, Director, Division of Administrative Support
- Mr. Ed Schneider, Director, Internal Audit
- Ms. Leanne Tippett Mosby, Deputy Director, Division of Environmental Quality
- Ms. Linda Jaegers, Assistant to Division Director, Division of Environmental Quality
- Ms. Janelle Rogers, Controller, Central Missouri Landfill, Inc.

**CENTRAL MISSOURI LANDFILL, INC
FINAL AUDIT FINDING RESOLUTION**

1. The Central MO Landfill Daily Solid Waste Record does not include the day of the week, landfill permit number, or landfill address.

Auditor Recommendation – The Central Missouri Landfill is to include the day of the week, permit number, and landfill address on all Daily Solid Waste Records.

Landfill Response – Central MO Landfill management agreed with the finding and recommendation.

SWMP Response – The Solid Waste Management Program (SWMP) concurs with the auditor’s recommendation.

SWMP Recommendation – The Central MO Landfill should provide copies of the landfill’s revised Daily Solid Waste Record showing inclusion of the day of the week, permit number, and landfill address. We request the landfill submit to SWMP copies of Daily Solid Waste Records completed by the landfill for a one week period showing compliance with 10 CSR 80-2.080(2)(B).

2. Landfill staff sometimes print the Daily Solid Waste Record before all scale tickets for the day have been finalized.

Auditor Recommendation – Central Missouri Landfill is to ensure all waste delivered to the landfill each day is reported on the Daily Solid Waste Record.

Landfill Response – Central MO Landfill management agreed with the finding and recommendation.

SWMP Response – The SWMP concurs with the auditor’s recommendation. The SWMP requests the landfill review the procedures used by staff for preparation and finalization of the Daily Solid Waste Record and ensure the procedures are in accordance with 10 CSR 80-2.080(2)(B)1.

SWMP Recommendation – The Central MO Landfill should provide a written response detailing modifications made to the procedures for preparation and finalization of the Daily Solid Waste Record. A copy of the modified written procedure for the preparation and finalization of the Daily Solid Waste Records or written instructions given to staff to correct this issue should be provided to the SWMP.

3. Scale tickets are not finalized until vehicles return from inside the landfill. A scale ticket can be altered or erased prior to being finalized.

Auditor Recommendation – Central MO Landfill should require all scale tickets to either be finalized or voided by management. It should never be possible to erase or alter a scale ticket once the vehicle weight has been recorded.

Landfill Response – Landfill management did not agree with the recommendation.

SWMP Response – The SWMP concurs with the auditor’s recommendation. The process described by the auditor has the potential for allowing alteration or erasure of scale tickets prior to finalization. This process could result in an underreporting of waste disposed at the landfill and failure to collect tonnage fees in accordance with 10 CSR 80-2.080(1)(B).

SWMP Recommendation – Scale tickets should not be altered and reused for any reason. The Central MO Landfill should provide a written response detailing modifications made to the landfill’s procedure to ensure scale tickets are either finalized or voided by management. A copy of the modified procedure or written instructions to staff should be provided to SWMP.

4. On 06/11/07, the Department of Agriculture (DOA), Device Inspection Program, found the Central MO Landfill commercial scales were “Out of Tolerance”.

Auditor Recommendation – Central MO Landfill should use only approved scales for weight determination of waste receipts. If approved scales are not available an alternative method to determine the weight of waste received, such as the use of outside scale tickets or the Volume Conversion Method described in 10 CSR 80-2.080 (3) (B), should be utilized.

Response – The Central MO Landfill has scheduled repair of their commercial vehicle scales on 06/23/07. The DAO planned to reinspect the Central MO Landfill scales the week ending 06/29/07.

SWMP Response – The SWMP concurs with the auditor’s recommendation.

SWMP Recommendation – The Central MO Landfill should provide a written response detailing the alternative method used by the permitted facility to make the weight determination of waste received during the period that the scale has been “Out of Tolerance”. Additionally, at the time the scale is returned to compliance the Central MO Landfill should provide to SWMP a copy of the DAO inspection showing the commercial vehicle scales have been certified.