



**August 29, 2011**

**Northwest Arkansas Regional Solid Waste Management District  
C/o Melinda Caldwell  
VIA Recyclables  
927 West Rush Street  
Harrison, AR 72601**

**RE: Quarter Inspection; AFIN 03-00208; Permit Number 0022-SWTP**

**Dear Ms. Caldwell:**

**On August 23, 2011 I performed a routine inspection of your facility pursuant to the Arkansas Waste Tire Program, Reg. 14, and the above referenced permit. A copy of the inspection report is enclosed for your review.**

**Please refer to the attached inspection report to note the specific allegations. A written response for the noted allegations, describing the corrective action taken or to be taken, must be submitted to my attention at the address listed below within thirty (30) days from the date hereof. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected and/or persistent may warrant formal enforcement action.**

**If I can be of any further assistance, feel free to contact me at (870-424-3322).**

**Sincerely,**

A handwritten signature in black ink, appearing to read "Gary Meador".

**Gary Meador, Inspector  
Solid Waste Management Division**

**Cc: The Honorable Tim McKinney  
Mayor of Berryville  
P.O.Box227  
Berryville, AR 72616**

**Attachment**



**Arkansas Department of Environmental Quality  
Solid Waste Management Division  
Waste Tire Processing Facility Inspection**



|                          |   |                         |                                      |                      |                  |
|--------------------------|---|-------------------------|--------------------------------------|----------------------|------------------|
| <b>Site Name</b>         | <b>NWARSWMD</b>   | <b>County</b>           | <b>Baxter</b>                        | <b>AFIN</b>          | <b>03-00208</b>  |
| <b>Facility Address</b>  | <b>Mtn. Home, Hwy. 201 N. to CR831 to CR 782 to the Damco Site Project.</b> | <b>Telephone Number</b> | <b>870-741-7026<br/>870-688-9362</b> | <b>Permit Number</b> | <b>0022-SWTP</b> |
| <b>Permittee Address</b> | <b>Melinda Caldwell<br/>927 West Rush Street<br/>Harrison, AR 72601</b>     | <b>E-Mail Address</b>   |                                      |                      |                  |
| <b>Date</b>              | <b>8-23-11</b>  | <b>Entry Time</b>       | <b>1345</b>                          | <b>Exit Time</b>     | <b>1530</b>      |
|                          |   |                         |                                      |                      | <b>Follow-Up</b> |
|                          |   |                         |                                      |                      | <b>Yes</b>       |
|                          |   |                         |                                      |                      | <b>No</b>        |
|                          |   |                         |                                      |                      | <b>x</b>         |

**Regulation 14 - Operational Standards**

|   |   |  |
|---|---|--|
| <b>Category 1</b><br>First Violation: Score of 1<br>Second Violation: Score of 2<br>Third Violation : Score of 4    |   | <b>Comments</b><br><br><i>The Solid Waste District has ceased all operations at the waste tire processing facility and plans to void the permit. They have contracted with Champlain Tire Recycling out of Kansas, to pickup, transport, and recycle waste tires.</i><br><br><i>Some of the processed tire bales are stored on the Damco Site Project.</i><br><br><i>Exit interview conducted by phone with Melinda Caldwell on 8/29/2011 at 9:20.</i><br><br><i>See comment pages</i> |
| Sign posted with required information 14.1402(F)  |   |  |
| Waste tires stored separately from used tires 14.1402(B)  |   |  |
| Records maintained and available 14.1207  |   |  |
| <b>Category 2</b><br>First Violation: Score of 2<br>Second Violation: Score of 4<br>Third Violation : Score of 8    |   |  |
| Emergency preparedness manual on site and updated 14.1402(N)  |   |  |
| Communication equipment maintained on site 14.1210; 14.1402(L)  |   |  |
| Site kept free of vegetation 14.1402(M)   |   |  |
| Residuals disposed or recycled 14.1901(C)(3)  |   |  |
| Separation distances maintained 14.1402(R)  |   |  |
| <b>2</b>  | Mosquito and rodent control 14.1209; 14.1402(E)<br>Passable access roads at all times 14.1402(H)<br>Site bermed for runoff control 14.1402(J)<br>Waste tire pile within maximum dimensions 14.1402(C) |  |
|   | Access to the site controlled 14.1402(I)  |  |
| <b>8</b>  | Processed tires meet storage criteria 14.1204<br>Department notified of emergency 14.1402(O)  |  |
| <b>Category 3</b><br>First Violation : Score of 3<br>Second Violation : Score of 6<br>Third Violation : Score of 12 |   |  |
| Fire protection services assured 14.1402(K)   |   |  |
| Operations involving use of open flames prohibited 14.1402(G)   |   |  |
| <b>12</b>   | Facility operates in accordance with permit documents 14.1201<br>Fifty foot wide fire lanes and unobstructed 14.1402(D)   |  |

**Regulation 14 - Records**

|                   |   |  |
|-------------------|---|--|
| <b>14.1402(N)</b> | Date of last revision/update to emergency preparedness manual | <b>March 2005</b>                                      |
| <b>14.1207</b>    | Quantity of waste tires/processed tires received              |  |
| <b>14.1207</b>    | Quantity of waste tires stored on site                        | <b>4000 Bales x 100 tires per bale = 400,000 tires</b> |
| <b>14.1207</b>    | Quantity of waste tires shipped from site                     |  |
| <b>14.1215</b>    | Date of last annual report                                    | <b>3-1-10</b>  |

|                                   |  |                               |  |
|-----------------------------------|--|-------------------------------|--|
| <b>Operator Name &amp; Number</b> | <b>Site Closed<br/>No Operator Available</b> | <b>Signature of Inspector</b> |  |
|-----------------------------------|--|-------------------------------|--|



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Comments Page**



|                  |          |             |          |                      |           |
|------------------|----------|-------------|----------|----------------------|-----------|
| <b>Site Name</b> | NWARSWMD | <b>AFIN</b> | 03-00208 | <b>Permit Number</b> | 0022-SWTP |
|------------------|----------|-------------|----------|----------------------|-----------|

**Category 2 Comments**

**Mosquito and rodent control 14.1209 Vector Control; 14.1402(E) Outdoor Above -Ground Tire Storage Vector Control: An approved vector control program must be operational at all times for tires stored outdoors. The owner or operator shall develop and implement a program to control mosquitoes and rodents or request such control measures from the local mosquito and vector control office, so as to protect the public health and welfare. Mosquito control measures may include covering containers and trailers used for the collection and storage of waste tires with a tarp or placing them under some type of constructed cover during inclement weather and/or when the business is closed.**

**Comments:**  
**Swarms of mosquitos were noted at the time of this inspection.**

**Processed tires meet storage criteria 14.1204**  
The storage limit for processing facilities is thirty (30) times the daily capacity of the processing equipment used.

**Comments:**  
According to the Baling Contractor the daily capacity of the processing equipment was approximately 2000 tires a day. Based on the daily capacity of the processing equipment maximum storage capacity for the facility would be 60,000 tires or 600 bales at 100 tires per bale. However, Site Specific Permit Conditions number 3(b) states that the number of tires at the site shall not exceed 28,000 passenger and truck tires at any time.


The Facility has an estimated 4000 bales X 100 tires per bale = 400,000 tires on site. Exceeding their storage limit for the permitted area.

**Category 3 Comments**

**Facility operates in accordance with permit documents 14.1201**  
Waste tire processing facilities shall obtain a permit and shall meet the requirements contained in this regulation for waste tire processing facilities (Waste Tire Processing Facility Requirements) or shall meet the general permit requirements contained in this regulation.

**Reg.14.1215 Annual Reporting**  
Owners and operators of waste tire processing facilities shall submit to the Department an annual report by March 1 that summarizes information on facility activities. The report shall be submitted to the Department on Form TP5 (Waste Tire Processing Facility Annual Report).

**Comments:**  
The Annual Report for 2010 has not been submitted at this time.

|                               |   |                        |         |             |   |
|-------------------------------|---|------------------------|---------|-------------|---|
| <b>Signature of Inspector</b> |  | <b>Inspection Date</b> | 8-23-11 | <b>Page</b> | 2 |
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|           |          |      |          |               |           |
|-----------|----------|------|----------|---------------|-----------|
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|-----------|----------|------|----------|---------------|-----------|

**Category 3 Comments**

**Facility operates in accordance with permit documents 14.1201**

**Site Specific Permit Conditions, Number 1: Financial Assurance**

*Financial assurance shall be provided and maintained based on Appendix B of Regulation Number 14. The amount of financial assurance is \$57,000 and shall be established and approved by the Department prior to the processing of the waste tires. This amount is subject to annual adjustment and may be increased at the discretion of the Department based on the cost for a third party to close the facility in accordance with an approved closure plan and with the guidelines set forth in Section 18 of Regulation Number 14. The amount of financial assurance is to be maintained and comply with the requirements of Regulation Number 14. Financial assurance amounts must be maintained at all times in order to cover the provisions of the Act and Regulation Number 14.*

**Comments:**

No documentation is on file with ADEQ indicating financial assurance has been provided for the Facility.

|                        |   |                 |         |      |   |
|------------------------|---|-----------------|---------|------|---|
| Signature of Inspector |  | Inspection Date | 8-23-11 | Page | 3 |
|------------------------|---|-----------------|---------|------|---|



0022-SWTP

photos 1 & 2





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photos 3 & 4





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photos 5 & 6





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photos 7 & 8

