



October 17, 2013

The Honorable Woody Wheelless  
Crittenden County Judge  
100 Court Street  
Marion, AR 72364

RE: Quarterly Inspection; AFIN 18-00094; Permit Number 0245-S1-R1.

Dear Judge Holt:

On October 14, 2013, I conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Regulation 22, and the above-referenced permit. A copy of the inspection report is enclosed for your records.

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) 247-5155.

Sincerely,

Bobby Gentry, ADEQ Inspector  
Solid Waste Management Division

CC: Scott McWilliams, Enforcement Coordinator, Solid Waste Management Division  
Ali Dorobati, Engineer, Solid Waste Management Division



# Arkansas Department of Environmental Quality

## Solid Waste Management Division


### Class 1 Landfill Inspection



<b>Site Name</b>	Crittenden County Class I	<b>County</b>	Crittenden	<b>AFIN</b>	18-00094
<b>Facility Address</b>	South off Hwy 70	<b>Phone Number</b>	LF: 870-732-4290 Off: 870-732-6580	<b>Permit Number</b>	0245-S1-R1
<b>Permittee Address</b>	Crittenden Co. Judge	<b>E-Mail Address</b>	arredllc@swb.net	<b>PDS #</b>	074197
<b>Date</b>	10-14-13	<b>Entry Time</b>	10:40 AM	<b>Exit Time</b>	12:00 PM

### Regulation 22 – Operational Standards

X	Depicts Violation	Category 1	
R	Repeat Violation		
	Regulation	Item Description	Comments
	411(l)	Adequate employee facilities	
	421(a)(b)	Record keeping meets requirements specified by regulations	
	417	Access requirements	
	411(j)	Adequate provisions for backup equipment	
	421(d)	Waste receipt records, ticket system maintained	
	411(k)	Telephone system & written emergency response plan on site	
	423(b)	Annual compliance inspection by registered professional engineer	
	422	Facility implements operating plan and narrative	
	421(f)	Leachate disposal/recirculation records	
	421(g),701	Special waste disposal and procedures records	
X	Depicts Violation	Category 2	
R	Repeat Violation		
	Regulation	Item Description	Comments
	411(a)	Operations in accordance with permit documents	
	417(c)	Adequate all weather operational roads	
X	411(c)	Smallest practical area, unloading supervised, single working face	Noted The active working face was not a practical working size. Photos 1-4
	411(e)	Salvage operations meet approved conditions	
	411(f)(1)	Scavenging of waste prohibited	
	411(p)	Proper wet weather repairs	
	411(b)	Operations by licensed on-site personnel at all times	
	411(d)	Waste spread and compacted as unloaded	
	411(g)	Litter control provisions maintained	
	414(a)	Disease vectors controlled	

Category 2 (continued)												
	Regulation	Item Description	Comments									
	427	Surface Water Controls										
	411(h)(1)	Contouring prevents surface water flowing into or through waste										
	418(a)(b)	Run-on/off control system present and adequate										
	411(h)(2)	Surface water control prevents off-site sediment accumulation										
	411(i);427(f)	Adequate maintenance of intermediate/final cover vegetation										
	415	Gas monitoring program										
X	411(o)	Leachate leaks or evidence of leachate seepage	Noted leachate leaks on west slopes of cells AB-7 and AB-32. Photos 5-8									
	426	Survey controls										
	429	Leachate collection system										
	420	Liquid Restrictions										
X	Depicts Violation	Category 3										
R	(Repeat Violation)											
	Regulation	Item Description	Comments									
	412	Implementation of hazardous/unauthorized waste exclusion plan										
	413(a)(b)	Satisfactory daily/alternative cover										
X	413(c)	Satisfactory intermediate cover	Noted exposed waste on west slope of cell AB-7 due to inadequate intermediate cover. Photos 9-12									
	416(b),411(f)(4)	Open burning prohibited										
	419	Cause discharge/leachate discharge leaving landfill										
	411(f)(3),419(a)(4)	Depositing waste in standing water prohibited										
	411(o)	Erosion or other cover defects resulting in exposed refuse										
	309(c)	Overfill/Off lined area										
Regulation 22 - Records												
421(a)(8), 1203(k)	Date of last groundwater monitoring report		9-30-13									
423(b)	Date of last engineering report		March 2013									
428	Liner construction in progress	Yes/No	No	Notice of liner construction	Yes/No	No	Third party CQA on-site during construction		Yes/No	No		
412(a)	Date of last random inspection for unauthorized waste		September	Total # for month	21							
415, 421(e)	Date of last quarterly methane monitoring		8-31-13	Detection level	0	415(a)	Explosive gas records current?		Yes/No	Yes		
421(g),412(a)(2),701	Date of last special waste received		10-10-13	Disposal location	Cell 1, K35							
421(d)	Previous quarter waste received		18,440.42	Tons	3rd QTR 2013							
427(c)	Surface water DMR records current?		Yes/No	Yes	Date of last leachate disposal – 10-7-13 Disposal Location: West Memphis Utility							
Fayetteville Shale Related		Yes/No	No	Fayetteville Shale Violation	Yes/No	No	Violation					
Operator Name & Number		Jeff Papasan			Signature of Inspector		 with Tobin Baker					
Exit Interview Conducted with		Jeff Papasan - 001217		Method	On-Site		Date	10-14-13		Time	11:40 PM	



**Arkansas Department of Environmental Quality**  
**Solid Waste Management Division**  
**Comments Page**



Site Name	Crittenden County Class 1	AFIN	18-00094	Permit Number	0245-S1-R1
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**Comments**


**Comments: 5-23-2012 Inspection:** At the time of inspection, it was noted that the landfill has been in the process of correcting an overfill issue at the north slope of Cell 1B and 2B as well as Cell 1A. The waste has been being taken to the west slope of what is labeled on the Contour Map as Class 1 Active Unit. The west slope of the Class 1 Active Unit has been surveyed by Santek engineers and found to have unused airspace at the west slope. According to the engineer drawings, the Class 1 Active Unit is an unlined landfill cell. Santek has submitted a Corrective Action Plan and other correspondence to ADEQ (Database Documents 62898, 62909, 63143 and 63157) regarding overfill, however, the corrective plan does not specify where the waste will be placed nor was there any correspondence found where ADEQ had approved the Corrective Action Plan. In addition, at the time of inspection, incoming waste was also being placed on the unlined west slope of Class 1 Active Unit. Further Notes: Jeff Papasan, Santek Landfill Manager, and I spoke via telephone on September 27, 2012. Mr. Papasan confirmed to me that the area that the overfill waste was being placed did not have a liner. I have spoken with ADEQ's site engineer, Ali Dorobati via email as well as in person on September 26, 2012 regarding the landfills Corrective Action Plan. An August 2, 2012 email from Mr. Dorobati quotes Regulation 22.309 (c) concerning an overfill management plan. This can be found under the database number 62909.

At the time of this report, it has not been determined if placing waste on the unlined landfill cell is a permit compliance issue.

► **12-12-2013 Inspection:** At the time of inspection, there had been much progress removing the excess fill and the facility has been notifying ADEQ on their progress. The waste is still being placed in the same cell in which is unlined. This area is named Class 1 Active Unit. A letter from Ali Dorobati in which can be found in ADEQ's database under Entry # 63289, states that the facility is required to submit a final survey report to ADEQ for review and approval after the overfill issue is resolved.

**Also noted:** The grid markers have been placed but they are not adequate for a permanent display. The landfill operator at the time of inspection informed us that a proper display of grid markers would be placed. See photos 14&15.

- **1-16-2013 Inspection:** The facility is continuing placing Class 1 waste on the unlined area.
- **4-17-13 Inspection:** The facility is continuing placing Class 1 waste on the unlined area.
- **7-17-13 Inspection:** The facility is continuing placing Class 1 waste on the unlined area.
- **10-14-13 Inspection:** The facility is continuing placing Class 1 waste on the unlined area.

Date	10-14-13	Signature of Inspector	 with Tobin Baker	Page	1
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0245-S1-R1 9 & 10





0245-S1-R1 11 & 12





# Arkansas Department of Environmental Quality

## SOLID WASTE DISPOSAL QUARTERLY REPORT FORM

Permit No.      AFIN:      FeeCode:      Class:

0245-S1-R1

18-00094

MSW

1

**FEES AND REPORT DUE**  
**OCTOBER 15, 2013**  
**Report Waste Amounts**  
**JUL/AUG/SEPT**  
**3rd Quarter 2013**

**Facility:**

San-Tek Environmental (Crittendon Co)

Waste Received Totals	Waste Totals	Total Waste @ Rate	Fees Due
Uncompacted Cubic Yards		\$ .40 per Cubic Yard	\$
Compacted Cubic Yards		\$ .75 per Cubic Yard	\$
Tons (Class 1's must use Tons only)	18,440.42	\$2.50 per Ton	\$ 46,101.05
A. Subtotal Fees Due:			\$ 46,101.05
<b>Waste Reduction Credit (WR) or Fee Exempt KAB Campaign</b>	<b>Waste Reduction (WR) or KAB Waste Totals</b>	<b>Waste Reduction (WR) or KAB Waste @ Rate</b>	<b>Note below if (WR) Waste Reduction or</b>
Uncompacted Cubic Yards		\$ .40 per Cubic Yard	\$
Compacted Cubic Yards		\$ .75 per Cubic Yard	\$
Tons		\$2.50 per Ton	\$
B. Subtotal Waste Reduction Credit:			\$ 0
<b>(WR) Reg 11.206(C): Waste Reduction</b>			
<b>(KAB) Act 189 of 2009: Fee Exemption for Waste from Keep America Beautiful (Spring-Great American Cleanup) and Keep Arkansas Beautiful (Fall-Great Arkansas Cleanup) Campaigns</b>			
Total Fees Due (A minus B)			\$ 46,101.05
Adjustment (Pre-approved by ADEQ)			0
Late Fee			\$ 0
Total Payment Due (Include with this Report)			\$ 46,101.05

*If the total reported this quarter is plus or <minus> 20% from the previous quarter's total, please explain why:*

**Signature of Preparer:** Jamie Miller

**Date:** 10/15/13 **Phone:** 423-303-7101

**Send to:**

Arkansas Department of Environmental Quality  
Solid Waste Division - Disposal Fee Program  
5301 Northshore Drive  
North Little Rock, AR 72118  
Phone (501) 682-0584 Fax (501) 682-0611  
e-mail: swdisposalfees@adeq.state.ar.us

**Facility Billing Address:**

Andrew Kandy  
San-Tek Environmental (Crittendon Co)  
650 25th NW Street  
Cleveland  
TN 37311

Quarterly reporting of waste amounts and payments of waste disposal fees are required by Arkansas Statute §8-6-601 and §8-6-1001 et al, pursuant to Regulation 11, available for review at [www.adeq.state.ar.us/regs](http://www.adeq.state.ar.us/regs).