



ARKANSAS  
Department of Environmental Quality

July 21, 2014

Ozark Mountain Solid Waste District  
Permitted as Northwest Arkansas Regional Solid Waste Management District  
c/o Melinda Caldwell  
927 West Rush Street  
Harrison, AR 72601

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

Dear Ms. Caldwell:

On July 17, 2014, 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 (479) 424-0326.

Sincerely,

A handwritten signature in black ink that reads "Justin Sparrow".

Justin Sparrow  
District Inspector

Attachment



# Arkansas Department of Environmental Quality

## Solid Waste Management Division

### Waste Tire Processing Facility Inspection



<b>Site Name</b>	NWARSWMD	<b>County</b>	Baxter	<b>AFIN</b>	03-00208
<b>Facility Address</b>	Baxter CR 831	<b>Phone Number</b>	870-741-7026	<b>Permit Number</b>	0022-SWTP
<b>Permittee Address</b>	927 Rush Street, Harrison, AR 72601	<b>E-Mail Address</b>		<b>PDS #</b>	078890
<b>Date</b>	7-17-14	<b>Entry Time</b>	1030	<b>Exit Time</b>	1130


### Regulation 14 – Operational Standards

	Depicts Violation	Category 1		
	Repeat Violation	Regulation	Item Description	Comments
		1402(F)	Sign posted with required information	
		1402(B)	Waste tires stored separately from used tires	
X		1207	Records maintained and available	See comments page
X		1402(N)	Emergency preparedness manual on site and updated	See comments page
X		1210; 1402(L)	Communication equipment maintained on site	See comments page
		1402(O)	Department notified of emergency	

	Depicts Violation	Category 2		
	Repeat Violation	Regulation	Item Description	Comments
R		1201	Operations in accordance with permit documents	See comments page
X		1402(M)	Site kept free of vegetation	See comments page
		901	Residuals disposed or recycled	
R		1209; 1402(E)	Mosquito and rodent control	See comments page
		1402(H)	Passable access roads at all times	
X		1402(J)	Site bermed for runoff control	See comments page
		1402(I)	Access to site controlled	

	Depicts Violation	Category 3		
	(Repeat Violation)	Regulation	Item Description	Comments
		1402(R)	Separation distances maintained	
X		1402(C)	Waste tire pile within maximum dimensions	See comments page
R		1402	Processed tires meet storage criteria	See comments page
		1402(K)	Fire protection services assured	
		1402(G)	Operations involving use of open flames prohibited	
		1402(D)	Fifty foot wide fire lanes and unobstructed	

## Regulation 14 - Records

1402(N)	Date of last revision/update to emergency preparedness manual	March 2005			
1402(Q)	Quantity of waste tires/processed tires received				
1402(Q)	Quantity of waste tires stored on site	4,000 bales X 100 tires per bale- 400,000 tires			
1402(Q)	Quantity of waste tires shipped from site				
1215	Date of last annual report	3-1-10			
Operator Name & Number		None- Facility is not in operation		Signature of Inspector	
					
Exit Interview Conducted with	None	Method		Date	



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### Comments Page



<b>Site Name</b>	NWA RSWMD	<b>AFIN</b>	03-00208	<b>Permit Number</b>	0022-SWTP
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### Category 1 Comments

**Records maintained and available 14.1207**

The owner or operator of a waste tire processing facility shall record and maintain information regarding their activities. The records shall be available for inspection by Department personnel during normal business hours.

**Comments:**

No records on site for review- Facility has not operated since 2010.

**Emergency preparedness manual on site and updated 14.1402(N)**

The operator of the site shall prepare and keep at the site an emergency preparedness manual. The manual shall be updated at least once a year, upon changes in operations at the site.

**Comments:**

No emergency preparedness manual available for review on site.

**Communication equipment maintained on site 14.1210, 14.1402(L)**


The owner or operator shall submit, for review and approval, an emergency preparedness plan that adequately mitigates all fire hazards, and provides for the safety and health of all persons who may be potentially affected by a fire event at the facility.

Communication equipment shall be maintained at all facilities to ensure that the site operator can contact local fire protection authorities in the event of a fire.

Adequate equipment to aid in the control of fires must be provided and maintained at the facility at all times.

**Comments:**

No communication equipment or fire control equipment noted on site at the time of this inspection.

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### Category 2 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:**  
*There has been no Annual Report submitted for 2010, 2011, or 2012.*

**Site kept free of vegetation 14.1402(M)**


The waste tire site shall be kept free of grass, underbrush, and other potentially flammable vegetation at all times.

**Comments:**  
*Excessive vegetation noted growing around and between all tire piles.*

**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:**  
*Permittee has taken no action to control vectors.*

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Category 2 Comments

**Site bermed for runoff control 14.1402(J)**

Effective surface water controls run-on/run-off controls, such as berms and ditches, shall be established for all waste tire storage and processing areas to prevent surface water from entering the storage and/or processing area and to prevent liquid runoff from a potential tire fire from leaving the site or entering surrounding water bodies.

**Comments:**

**No run-on berms noted preventing surface water from entering the processing and storage area. No berming or surface water ditches noted preventing run-off from entering the DAMCO Project lake. Currently, all run-off surface water is being collected and contained in the lake.**

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### Category 3 Comments

**Waste tire pile within maximum dimensions 14.1402(C)**

An outdoor waste tire pile or processed tire pile shall have no greater than the following maximum dimensions.

- (1) Width: fifty (50) feet
- (2) Length: one-hundred (100) feet; and
- (3) Height: fifteen (15) feet

**Comments:**

*Waste tire piles, including baled waste tires are well in excess of the 50 ft x 100 ft maximum dimensions.*

**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:**

Based on the daily capacity of the processing equipment, at the time the facility was in operation, the 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.

**Comments:**

*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. See attached Google Earth Image of the approximate permitted area.*

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Permit Number 0022-SWTP  
Photos 1 & 2





Permit Number 0022-SWTP  
Photos 3 & 4



Permit Number 0022-SWTP  
Photos 5 & 6



Permit Number 0022-SWTP  
Photos 7 & 8

