



October 28, 2014

Ozark Mountain Solid Waste District  
Permitted as Northwest Arkansas Regional Solid Waste Management District  
C/o Melinda Caldwell  
PO Box 1715  
Harrison, AR 72602

RE; Quarterly Inspection    AFIN; 03-00208    Permit; #0022-SWTP

Dear Ms. Caldwell:

On October 23, 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 870-424-3322 or Meador@adeq.state.ar.us.

Sincerely,

Gary Meador  
ADEQ Inspector  
Solid Waste Management Division

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>	Mtn. Home, Hwy. 201 N. to CR831 to CR 782 to Damco Site	<b>Phone Number</b>	(870) 688-9362	<b>Permit Number</b>	0022-SWTP
<b>Permittee Address</b>	Melinda Caldwell, P.O. Box 1715, Harrison, AR 72602	<b>E-Mail Address</b>		<b>PDS #</b>	080554
<b>Date</b>	10-23-14	<b>Entry Time</b>	1400	<b>Exit Time</b>	1500

### Regulation 14 – Operational Standards

#### Category 1

	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	


#### Category 2

	Regulation	Item Description	Comments
X	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	
X	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	

#### Category 3

	Regulation	Item Description	Comments
	1402(R)	Separation distances maintained	
X	1402(C)	Waste tire pile within maximum dimensions	See Comments Page
X	1204	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

<b>1402(N)</b>	<b>Date of last revision/update to emergency preparedness manual</b>	March 2005			
<b>1402(Q)</b>	<b>Quantity of waste tires/processed tires received</b>				
<b>1402(Q)</b>	<b>Quantity of waste tires stored on site</b>	4,000 x 100 tires per bale = 400,000			
<b>1402(Q)</b>	<b>Quantity of waste tires shipped from site</b>		<b>Site Conditions</b>	Dry	
<b>1215</b>	<b>Date of last annual report</b>	3-1-10	<b>Weather Conditions</b>	Sunny	
<b>Operator Name &amp; Number</b>		None, Facility not in Operation		<b>Signature of Inspector</b>	
<b>Exit Interview Conducted with</b>	<b>None</b>	<b>Method</b>		<b>Date</b>	
				<b>Time</b>	



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**Comments Page**



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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 available for review at the Site. The Facility stopped all operations in 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 apparent communication equipment or fire control equipment was observed onsite 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 FormTP5 (Waste Tire Processing Facility Annual Report).

**Comments:**

**There has been no Annual Report submitted for 2010, 2011, 2012, or 2013.**

**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:**

**Vegetation was noted growing between and around 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:**

**The Permittee has taken no action towards implementing any type mosquito or rodent control measures.**

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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:**

**There are no apparent run-on/run-off controls measures in place for the processing and storage areas. All storm water run-off is being collected and contained in the DAMCO Project 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 and baled waste tires are 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.**

**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 0022-SWTP Photos 1 & 2





Permit 0022-SWTP Photos 3 & 4





Permit 0022-SWTP Photos 5 & 6





Permit 0022-SWTP Photos 7 & 8





Permit 0022-SWTP Photos 9 & 10





Permit 0022-SWTP Photos 11 & 12





Permit 0022-SWTP Photos 13 & 14

