



February 4, 2016

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 Wheelless:

On February 1, 2016, 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 870-935-7221 or bakert@adeq.state.ar.us.

Sincerely,

A handwritten signature in dark ink that reads "Tobin Baker".

Tobin Baker
ADEQ Inspector
Office of Land Resources Division

Attachment



Arkansas Department of Environmental Quality

Office of Land Resources Division

Class 1 Landfill Inspection



Site Name	Crittenden Co nty Class	County	Crittenden	AFIN	18-00094
Facility Address	South off Hwy 70	Phone Number	- 32-42 ff - 32-	Permit Number	0245-S1-R1
Permittee Address	Crittenden Co. dge	E-Mail Address	arredllc s b.net	PDS #	088920
Date	2/1/2016	Entry Time	12:55 PM	Exit Time	2:50 PM

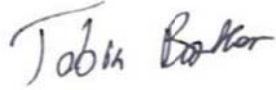
Regulation 22 – Operational Standards

Category 1

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	

Category 2

Regulation	Item Description	Comments
411(a)	Operations in accordance with permit documents	
417(c)	Adequate all weather operational roads	
411(c)	Smallest practical area, unloading supervised, single working face	
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												
	411(o)	Leachate leaks or evidence of leachate seepage												
	426	Survey controls												
	429	Leachate collection system												
	420	Liquid Restrictions												
Category 3														
	Regulation	Item Description					Comments							
	412	Implementation of hazardous/unauthorized waste exclusion plan												
X	413(a)(b)	Satisfactory daily/alternative cover					Still noted this inspection: According to Landfill Supervisor, Lum Pickle, a tarp was utilized for daily cover. Alternative cover materials, such as the tarp that was utilized, must be approved by the Department. See Photos 1-2.							
	413(c)	Satisfactory intermediate cover												
	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			10/31/2015		Site Conditions		Wet					
423(b)		Date of last engineering report			3/13/ 2015		Weather Conditions		Cloudy					
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			2/1/2016		Total # for month		22					
415, 421(e)		Date of last quarterly methane monitoring			12/8/2015		Detection level		0	415(a)	Explosive gas records current?		Yes/No	Yes
421(g),412(a)(2),701		Date of last special waste received			12/1/2016		Disposal location		Cell 3					
421(d)		Previous quarter waste received			18,972.80		Tons		4 th Quarter 2015					
427(c)		Surface water DMR records current?			Yes/No	Yes								
Fayetteville Shale Related			Yes/No	No	Out of Compliance with Fayetteville Shale			Yes/No	No					
Operator Name & Number			Ed Jackson- 001217				Signature of Inspector							
Exit Interview Conducted with			Lum Pickle		Method	On-Site		Date	2/1/2016		Time	2:45		

0245-S1-R1 Photo 1 & 2



From: Phillip [<mailto:pfields@fieldsassociatesllc.com>]
Sent: Friday, March 04, 2016 2:39 PM
To: jmcdonald@santekenviro.com; Ron E. Vail; Baker, Tobin
Subject: Crittenden County 2/1/16 Inspection Response

Afternoon Tobin,

Please find attached the response to the inspection conducted by the ADEQ Solid Waste Division on 2/1/2016 at the Crittenden County Landfill.

Thank you

Phillip Fields, P.E., P.G.
Fields & Associates, LLC
75 Norfolk Drive
Maumelle, AR 72113
(501) 912-6381

Rec'd Digitally

AFIN: 18-00094

PMT#: 0245-S1-R1

RECEIVED
By spakes at 1:39 pm, Mar 07, 2016

DOC ID#: 69031

TO: TB > FILE

S
W
M
D

Fields & Associates, LLC

75 Norfolk Drive
Maumelle, AR 72113

Office: (501) 912-6381
Fax: (866) 228-5146

"Providing Innovative Solutions to the Solid Waste Industry"

March 2, 2016

Mr. Tobin Baker
ADEQ Inspector
Arkansas Department of Environmental Quality
Office of Land Resources Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: Crittenden County Class 1 Landfill Inspection Response AFIN 18-00094, Permit No. 0245-S1-R1

Dear Mr. Baker:

Fields & Associates, on behalf of Santek Environmental of Arkansas, LLC and Crittenden County, is submitting the following response to the inspection conducted by the ADEQ Office of Land Resources Division on February 1, 2016 at the above referenced facility.

➤ **Category 3- Reg.22.413 (a)(b) Satisfactory daily/alternative cover**

Comment: Still noted this inspection: According to Landfill Supervisor, Lum Pickle, a tarp was utilized for daily cover. Alternative cover materials, such as the tarp that was utilized, must be approved by the Department. See Photos 1-2.

Response: Crittenden County requested to use tarps as an alternative daily cover (ADC) on October 28, 2008 (ADEQ Document Identifier 54005). The trial period for evaluation of the tarps was subsequently approved on November 4, 2008 (ADEQ Document Identifier 54058). During the November 5, 2015 ADEQ inspection, it was identified that the final approval for the use of tarps as ADC had not been completed. An evaluation was submitted to the ADEQ on November 23, 2015 (ADEQ Document Identifier 68613). In discussions with the ADEQ Solid Waste Division, it was determined that additional information would be required to approve the use of tarps as an ADC. The ADEQ requested that a new trial period for evaluation of the ADC be submitted. The request for this evaluation period was submitted on January 19, 2016 (ADEQ Document Identifier 68831). The approval for the trial period was subsequently approved on March 2, 2016 (ADEQ Document Identifier 68838). The ADC evaluation approval letter is attached for reference.

Please feel free to call me at (501) 912-6381 if I can be of additional assistance or if you have any questions.

Sincerely,
Fields & Associates, LLC

A handwritten signature in blue ink, appearing to read 'P. Fields', is written over a faint, light blue circular stamp.

Phillip Fields, P.E., P.G
F&A President

Cc: Mr. Ron Vail, P.E., Vice President of Engineering, Santek Waste Services



ARKANSAS
Department of Environmental Quality

March 2, 2016

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

**RE: Alternative Daily Cover Demonstration Request for
Crittenden County Class 1 Landfill
Permit Number: 0245-S1-R1; AFIN: 18-00094
Document Number: 68838; Cross Reference Number: 68831**

Dear Judge Wheelless:

The Arkansas Department of Environmental Quality-Office of Land Resources (OLR) has received your request for an alternative daily cover demonstration for the Crittenden County Class 1 Landfill. APC&EC Reg.22.413 states that alternative daily cover materials of an alternative thickness (other than at least six inches of earthen material) may be approved by the Director, either through individual requests or through generalized Department approval upon demonstration that the alternative material and thickness controls disease vectors, fires, odors, blowing litter, and scavenging without presenting a threat to human health and the environment.

Crittenden County Class 1 Landfill is granted the alternative daily cover (ADC) demonstration in accordance with the proposed demonstration plan submitted on February 2, 2016. During the demonstration period of at least ninety (90) days, the ADC shall be frequently inspected to ensure the requirements of Regulation 22.413 are met. A report on the effectiveness, including the daily logs required by the plan, shall be submitted to the Department at the end of the trial period. Once the demonstration period has ended, and upon submittal of the final report and permanent usage request, the Department will make a determination of the effectiveness of the ADC and either grant or deny the use of the alternative daily cover.

If you have any questions or need additional information regarding this correspondence, please contact me at (501) 682-0603.

Sincerely,

A handwritten signature in black ink, appearing to read "Ali Dorobati".

Ali Dorobati
Project Engineer

cc: OLR – Leamons, Baker, Love, McWilliams, and Hynum
Phillip Fields, Fields & Associates