



February 1, 2017

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

RE: Quarterly Inspection conducted on January 31, 2017
AFIN 18-00094
Permit Number 0245-S1-R1

Dear Judge Wheelless:

The Arkansas Department of Environmental Quality – Office of Land Resources (ADEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. The inspection identified conditions at your facility which the ADEQ alleges constitute violations of APC&EC Regulation No. 22. A copy of the inspection report is attached.

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 within thirty (30) calendar days from the date of this letter to the attention of Tobin Baker. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected or persistent may warrant formal enforcement action.

If you have any questions regarding the alleged violations, please do not hesitate to contact me at (870) 935-7221 or bakert@adeq.state.ar.us.

Sincerely,

A handwritten signature in dark ink that reads "Tobin Baker". The signature is written in a cursive, flowing style.

Tobin Baker
Solid Waste Inspector
Office of Land Resources

Attachment

cc: Tammie J. Hynum, Acting Sr. Operations Manager, Office of Land Resources



Arkansas Department of Environmental Quality

Office of Land Resources -Solid Waste Management

Class 1 Landfill Inspection



Site Name	Crittenden County Class I	County	Crittenden	AFIN	18-00094
Facility Address	South off Hwy 70	Phone Number	LF: 870-732-4290 Off: 870-732-6580	Permit Number	0245-S1-R1
Permittee Address	Crittenden Co. Judge	E-Mail Address	arredllc@swb.net	PDS #	095086
Date	1/31/2017	Entry Time	9:40 AM	Exit Time	11:45 AM

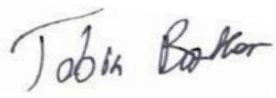
Regulation 22 – Operational Standards

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									
X	411(o)	Leachate leaks or evidence of leachate seepage		Leachate leaks were observed in the middle of the south slope and on the west slope of the landfill. See Photos 1-4.							
	426	Survey controls									
	429	Leachate collection system									
	420	Liquid Restrictions									
Category 3											
Regulation	Item Description	Comments									
	412	Implementation of hazardous/unauthorized waste exclusion plan									
	413(a)(b)	Satisfactory daily/alternative cover									
	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	1/6/2017		Site Conditions		Wet					
423(b)	Date of last engineering report	3/23/ 2016		Weather Conditions		Sunny					
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	1/31/2017		Total # for month		21					
415, 421(e)	Date of last quarterly methane monitoring	10/26/2016		Detection level		0	415(a)	Explosive gas records current?		Yes/No	Yes
421(g),412(a)(2),701	Date of last special waste received	1/31/2017		Disposal location							
421(d)	Previous quarter waste received	17,711.79		Tons		4 th Quarter 2016					
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		John McDonald		Method	On-Site		Date	1/31/2017		Time	11:35

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Crittenden Co. Class 1 Landfill				Permit	0245-S1-R1	AFIN	18-00094
Photographer	Tobin Baker				Witness	N/A		
Photo #	1	Of	4		Date	1/31/2017	Time	10:26 AM
Description	Leachate leaks on south slope							



Location	Crittenden Co. Class 1 Landfill				Permit	0245-S1-R1	AFIN	18-00094
Photographer	Tobin Baker				Witness	N/A		
Photo #	2	Of	4		Date	1/31/2017	Time	10:27 AM
Description	Leachate leaks on south slope							



Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Crittenden Co. Class 1 Landfill	Permit	0245-S1-R1	AFIN	18-00094
Photographer	Tobin Baker	Witness	N/A		
Photo #	3	Of	4	Date	1/31/2017
Time	10:40 AM				
Description	Leachate leaks on west slope				
					
Location	Crittenden Co. Class 1 Landfill	Permit	0245-S1-R1	AFIN	18-00094
Photographer	Tobin Baker	Witness	N/A		
Photo #	4	Of	4	Date	1/31/2017
Time	10:40 AM				
Description	Leachate leaks on west slope				
					



Santek Waste Services of Arkansas
Crittenden County Landfill
1299 Kuhn Road
West Memphis, AR 72301
Phone (423) 716-4332
Fax (870) 735-2932

February 21, 2017

Attn: Mr. Tobin Baker
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

Re: ADEQ Quarterly Inspection: January 31, 2017
Crittenden County Landfill (Permit #0245-S1-R1)

Dear Mr. Baker:

On behalf of Santek Environmental of Arkansas, LLC, the enclosed information package provides updated information relating to corrective actions completed by site personnel in response to deficiencies found during the January 31, 2017 ADEQ Quarterly Inspection. If you require additional information, I can be contacted at (423) 716-4332.

Sincerely,

A handwritten signature in blue ink that reads "John McDonald". The signature is written in a cursive style with a horizontal line underneath the name.

John McDonald
Landfill Manager

Cc: Hon. Woody Wheelless: County Judge, Crittenden County, AR
Matt Dillard, Executive V.P. of Operations, Santek

Category 1

No Violations Noted

Category 2

Item Number

1. **Regulation 411 (o)** – Leachate leaks were observed on the south slope of the landfill

Corrective Action – Leachate leaks were repaired



Leachate leaks corrected on 2/6/2017



Category 2

Item Number

2. **Regulation 411 (o)** – Leachate leaks were observed on the west slope of the landfill

Corrective Action – Leachate leaks were repaired



Leachate leaks corrected on 2/8/2017

Category 3

No Violations Noted