



April 18, 2017

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

RE: Quarterly Inspection conducted on April 13, 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 I can be of any further assistance, please do not hesitate to contact me at (870) 935-7221 or bakert@adeq.state.ar.us.

Sincerely,

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

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	1299 Khun Rd. West Memphis, AR 72301	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 #	096580
Date	4/13/2017	Entry Time	1:10 PM	Exit Time	3:00 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										
X 411(o)	Leachate leaks or evidence of leachate seepage	Leachate leaks were observed on the west slope of the landfill. See Photos 1-2.									
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	4/12/2017	Site Conditions		Dry						
423(b)	Date of last engineering report	3/7/ 2017	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	4/13/2017	Total # for month		20						
415, 421(e)	Date of last quarterly methane monitoring	3/21/2017	Detection level		0	415(a)	Explosive gas records current?		Yes/No	Yes	
421(g),412(a)(2),701	Date of last special waste received	4/13/2017	Disposal location								
421(d)	Previous quarter waste received	17,591.12	Tons		1 st Quarter 2017						
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	4/13/2017		Time	2:50

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			TB	Witness	N/A		
Photo #	1	Of	2		Date	4/13/2017	Time	1:56PM
Description	Leachate leaks on west slope of the landfill (looking west)							
								
Location	Crittenden Co. Class 1 Landfill				Permit	0245-S1-R1	AFIN	18-00094
Photographer	Tobin Baker			TB	Witness	N/A		
Photo #	2	Of	2		Date	4/13/2017	Time	1:56PM
Description	Leachate leaks on west slope of the landfill (looking west)							
								



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

May 3, 2017

Attn: Mr. Tobin Baker

Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

Re: ADEQ Quarterly Inspection April 13, 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 April 13, 2017 ADEQ Quarterly Inspection. If you require additional information, I can be contacted at (423) 716-4332.

Sincerely,

John McDonald
Landfill Manager

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

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AFIN:	18-00094
PMT#:	0245-S1-R1
DOC ID#:	71741
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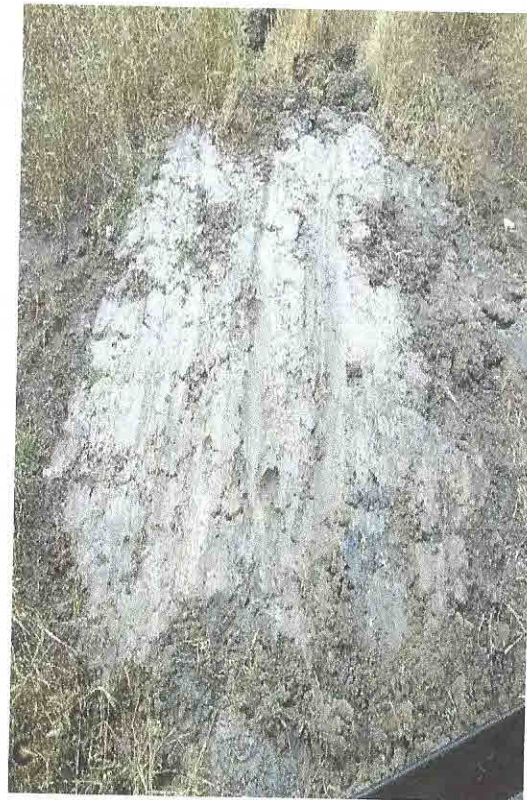
Category 1

No Violations Noted

Category 2

Item Number

1. **Regulation 411 (o)** Leachate leak was observed on the west slope of the Landfill
Corrective Action - Leachate leak was repaired.



Leachate leak corrected on 5/1/2017

Category 2

Item Number

1. **Regulation 411 (o)** Leachate leak was observed on the west slope of the Landfill
Corrective Action - Leachate leak was repaired.



Leachate leak corrected on 5/1/2017