



November 6, 2017

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

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

Dear Mr. 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](mailto: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: Charles M. Johnson, Senior Manager, Regulated Waste Operations, Office of Land Resources



# Arkansas Department of Environmental Quality

## Office of Land Resources -Solid Waste Management

### Class 1 Landfill Inspection



<b>Site Name</b>	Crittenden County Class I	<b>County</b>	Crittenden	<b>AFIN</b>	18-00094
<b>Facility Address</b>	1299 Khun Rd. West Memphis, AR 72301	<b>Phone Number</b>	LF: 870-732-4290 Off: 870-732-6580	<b>Permit Number</b>	0245-S1-R1
<b>Permittee Address</b>	Crittenden Co. Judge	<b>E-Mail Address</b>	arredllc@swb.net	<b>PDS #</b>	099999
<b>Date</b>	10/31/2017	<b>Entry Time</b>	12:35 PM	<b>Exit Time</b>	2:00 PM

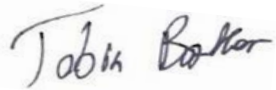
### Regulation 22 – Operational Standards

#### 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. (Refer to 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			8/31/2017		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			10/30/2017		Total # for month		20					
415, 421(e)		Date of last quarterly methane monitoring			8/15/2017		Detection level		0	415(a)	Explosive gas records current?		Yes/No	Yes
421(g),412(a)(2),701		Date of last special waste received			10/31/2017		Disposal location							
421(d)		Previous quarter waste received			18,197.77		Tons		3 <sup>rd</sup> 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		Roger Cochran			Method	On-site		Date	10/31/2017		Time	1:50		



**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**

<b>Location</b>	Crittenden Co. Class 1 Landfill				<b>Permit</b>	0245-S1-R1	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker			TB	<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	2		<b>Date</b>	10/31/2017	<b>Time</b>	1314
<b>Description</b>	Leachate leaks on the west slope of the landfill (looking west).							
								
<b>Location</b>	Crittenden Co. Class 1 Landfill				<b>Permit</b>	0245-S1-R1	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker			TB	<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	2		<b>Date</b>	10/31/2017	<b>Time</b>	1314
<b>Description</b>	Leachate leaks on the west slope of the landfill (looking west).							
								

## Winthrop, Shelby

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**To:** Blue, Karen  
**Subject:** RE: ADEQ INSPECTION RESPONSE FOR OCT. 31, 2017 INSPECTION

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**From:** Takisha Ball [<mailto:tball@santekenviro.com>]  
**Sent:** Thursday, November 30, 2017 1:13 PM  
**To:** Baker, Tobin  
**Cc:** Roger Cochran; Matt Dillard; Paula Adams  
**Subject:** ADEQ INSPECTION RESPONSE FOR OCT. 31, 2017 INSPECTION

Good Afternoon,

Attached you will find the ADEQ Quarterly Inspection Response for the inspection done on October 31, 2017. Should there be any questions, or concerns please feel free to contact (GM) Roger Cochran.

(c) 423.464.3543  
(o) 870.732.4290  
(e) [rcochran@santekenviro.com](mailto:rcochran@santekenviro.com)

Have a blessed day,

**Takisha Ball**

Scale Operations



**Crittenden County Landfill**

Office: 870.732.4290

Fax: 870.735.2932

Email: [tball@santekenviro.com](mailto:tball@santekenviro.com)  
[www.santekenviro.com](http://www.santekenviro.com)

<b>Rec'd Digitally</b>	
<b>AFIN:</b> <u>18-00094</u>	<b>S W M D</b>
<b>PMT#:</b> <u>0245-S1-R1</u>	
<div style="border: 1px solid black; padding: 2px;"><b>RECEIVED</b> <small>By Shelby Winthrop at 8:55 am, Dec 04, 2017</small></div>	
<b>DOC ID#:</b> <u>72865</u>	
<b>TO:</b> <u>TB&gt;File &lt;SDW</u>	



Santek Waste Services of Arkansas  
Crittenden County Landfill  
1299 Kuhn Road  
West Memphis, AR 72301  
Phone (423) 464-3543  
Fax (870) 735-2932

November 30, 2017

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

Re: ADEQ Quarterly Inspection October 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 October 31, 2017 ADEQ Quarterly Inspection. If you require additional information, I can be contacted at (423) 464-3543.

Sincerely,

Roger Cochran  
Landfill Manager

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



**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 seepage was corrected on 11/29/17

