ADEQ
ARKANSAS
Department of Environmental Quality

December 27, 2017

Pulaski County Recycling and Disposal
David Steinmetz
9611 Ironton Road
Little Rock, Arkansas 72206

RE: Quarterly Inspection conducted on December 12, 2017
AFIN 60-04211
Permit Number 0314-S4-R1

Dear Mr. Steinmetz:

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.

A written response for the observed 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 Lori Burke. As discussed on-site, please also submit to ADEQ the proper change of owner documentation within thirty (30) calendar days from the date of receiving this letter. If you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 682-0877 or krou@adeq.state.ar.us.

Sincerely,

Christopher J. Krou
Compliance Branch Manager
Office of Land Resources

Attachment

cc: Charles M. Johnson, Senior Manager, Regulated Waste Operations, Office of Land Resources

ADEQ
ARKANSAS
Department of Environmental Quality

Arkansas Department of Environmental Quality
Office of Land Resources/Solid Waste
Class 4 Landfill Inspection

Site Name	Pulaski Co Recycling and Disposal	**County**	Pulaski	**AFIN**	60-04211
Facility Address	9611 Ironton Road, Little Rock, AR 72206	**Phone Number**	501-888-1544	**Permit Number**	0314-S4-R1
Permittee Address	9611 Ironton Road, Little Rock AR 72206	**E-Mail Address**		**PDS #**	100702
Date	**12/12/2017**	**Entry Time**	**1000**	**Exit Time**	**Approximately 1300**

Regulation 22 – Operational Standards

Category 1

	Regulation	Item Description	Comments
	607(l)	**Adequate employee facilities**	
	617(a)(b)	**Record keeping meets requirements specified by regulations**	
	613	**Access requirements**	
	607(j)	**Adequate provisions for backup equipment**	
	617(c)	**Waste receipt records, ticket system maintained**	
	607(k)	**Telephone system & written emergency response plan on site**	
	619(a)	**Annual compliance inspection by registered professional engineer**	
	618	**Facility implements operating plan and narrative**	
	701	**Special waste disposal and procedures records**	

Category 2

	Regulation	Item Description	Comments
	607(a)	**Operations in accordance with permit documents**	
	613(c)	**Adequate all weather operational roads**	
X	**607(c)(d)**	**Smallest practical area, single working face**	See Comment Page
	607(e)	**Salvage operations meet approved conditions**	
	607(f)(1)	**Scavenging of waste prohibited**	
	613 (c)	**Proper wet weather repairs**	
	607(b)	**Operations by licensed on-site personnel at all times**	
	607(d)	**Waste spread and compacted as unloaded**	
	607(g)	**Litter control provisions maintained**	
	610(a)	**Disease vectors controlled**	
	611	**Gas monitoring program**	
X	**622**	**Survey controls**	See Comment Page

Category 2 (continued)

	Regulation	Item Description	Comments
	623	Surface water controls	
X	607(h)(1)	Contouring prevents surface water flowing into or through waste	See Comment Page
	614(a)	Run-on/off control system present and adequate	
	607(h)(2)	Surface water control prevents off-site sediment accumulation	
	607(h)(i)(o)	Adequate maintenance of intermediate/final cover vegetation	
X	607(o)	Leachate leaks or evidence of leachate seepage	See Comment Page
	616	Liquid restrictions	

Category 3

	Regulation	Item Description	Comments
	608	Implementation of hazardous waste exclusion plan	
X	609(a)	Satisfactory weekly or more frequent cover	See Comment Page
	609(b)	Satisfactory immediate cover	
	612(b),607(f)(4)	Open burning prohibited	
	615	Cause discharge/leachate discharge leaving landfill	
	607(f)(3),615(a)(4)	Depositing waste in standing water prohibited	
X	607(o)	Erosion or other cover defects resulting in exposed refuse	See Comment Page
X	309(c)	Overfill/off lined area	See Comment Page

Regulation 22 - Records

617(a)(4), 621(e)	Date of last groundwater monitoring report		N/A			Site Conditions	Dry		
619	Date of last engineering report		7/05/2016			Weather Conditions	Sunny		
617(a)(4)	Liner construction in progress	Yes/No Y	Notice of liner construction	Yes/No Y		Third part CQA on-site during construction	Yes/No NA		
608	Date of last random inspection for unauthorized waste		Everyday	Total # for month					
611	Date of last quarterly methane monitoring		N/A	Detection level			Explosive gas records current?	Yes/No	
701	Date of last special waste received		N/A	Disposal location					
617(c)	Previous quarter waste received		See attachment	Tons					
623	Surface water DMR records current	Yes/No	unknown						

Operator Name & Number		Signature of Inspector					
Exit Interview Conducted with	David Steinmetz	Method	In person	Date	12/12/2017	Time	1300

For ADEQ Use Only

Arkansas Department of Environmental Quality
Solid Waste Management Division
Comments Page

Site Name	Pulaski Co Recycling & Disposal Class IV Landfill	AFIN	60-04211	Permit Number	0314-S4-R1

Category 2 Comments

Reg.22.607 General Operating Requirements: (c) (d) Working Face Size- Dumping shall be confined to the smallest practical area. Multiple working faces shall not be allowed unless specifically approved in the facility operating plan. (d) Waste Spreading and Compacting- As rapidly as solid waste is unloaded for disposal it shall be spread and compacted in the smallest practical area and covered in accordance with the requirements of Reg 22.609. (Smallest practical area, single working face)

Comments: Multiple areas of exposed solid waste The current working faces were too large to control vectors, litter, odors and fires. This allegation has not been corrected in regard to CAO-LIS 15-091, facility continues to have too large of working face. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Reg.22.622-Survey Controls (a) Survey Controls Required- Each permitted landfill shall develop and maintain a method of survey control in accordance with Reg.22.426. (Survey Control)

Comment: Grid markers and survey control markers still have not been installed. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Reg.22.607 (h) Additional Surface Water Controls and Best Management Practices –In conjunction with and in addition to the requirements of Reg.22.614 and Reg.22.615 , the owner or operator shall
(1) Contour the surface of the working portion of the landfill to minimize surface water run-on or flow into or through the working face; and
(2) Install construct, repair, and maintain controls to prevent off-site sediment accumulation at all landfill. Temporary and permanent seeding , grading, diking, terracing, diversion ditches, silt fencing , silt traps, vegetation filter strips, mulching, erosion control blankets and matting, gravel filter berms, check dams, riprap, sediment ponds and other best management practices for erosion and sediment control shall be provided as necessary (Contouring prevents surface water flowing into or through waste)

Comments: This area of concern continues to be observed. The slopes still do not have established grass or other BMP's (no silt fencing, check dams, rip rap, diking or seeding) in place to control surface water. Nor are there ditches at cell 1, cell 6, cell 7, cell 8 and cell 9 on the eastern side to convey water to the sedimentation pond. There are no surface water controls in place to prevent water flowing into the active working face and the unconstructed cells. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Reg.22.607 General Operating Requirements: (o) Cover Maintenance- Areas of leachate seepage, or areas exhibiting evidence of leachate seepage such as staining and discoloration of the cover system shall also be promptly repaired.

Comments: Leachate seeps were observed on the northern side of the landfill running into the unconstructed cell. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Date	12/12//2017	Signature of Inspector		Page	3

Arkansas Department of Environmental Quality
Solid Waste Management Division
Comments Page

Site Name	Pulaski Co Recycling & Disposal Class IV Landfill	AFIN	60-04211	Permit Number	0314-S4-R1

Category 3 Comments

Reg.22.609(a)Cover Material Requirements – (a) Applicability and Frequency of Cover- The owners or operators of Class IV Landfills must cover disposed waste with six inches of earthen material at least weekly or at more frequent intervals if necessary, to control disease vector, fires, odors, blowing litter, scavenging and to limit the generation of leachate. (Satisfactory weekly or more frequent cover)

Comments: Multiple areas with exposed solid waste were observed. The current areas were too large to control vectors, litter, odors, and fires. Multiple working faces were observed. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Reg.22.607 General Operating Requirements (o) Cover Maintenance- The owner or operator shall be responsible for maintaining the cover system integrity and shall promptly repair erosion , washout tracking or other defects that result in exposed or flagging refuse in either daily, intermediate or final cover.(Erosion or other cover defects that resulting in exposed refuse)

Comment: There were areas on the slopes and on top that exhibited exposed waste in washouts and erosion cuts. No temporary measure was being taken to minimize these conditions, until permanent repairs could be made. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Reg.22.309 – Duration of Permits (c) Any landfill permittee who places or disposes waste above permitted elevations, or beyond the permitted landfill perimeter or in excess of the permitted capacity of the unit shall immediately cease fill operations in the area containing excess fill. The permittee shall provide to the Department an overfill management plan in writing within seven (7) days of learning of the excess fill. The permittee shall remove the excess fill, including waste, daily cover or intermediate cover, to bring the area into compliance within thirty (30) days of learning of the overfill. (Overfill/off lined area)

Comments: According to the 2016 AEIR, the south side of Cell 1 & 2 and the North toe of Cell 8A were identified as be above the permitted final grade or outside the lined area. Overfill Management Plan (ADEQ # 71023) was submitted with a deadline of March 26, 2017 (ADEQ # 71024). At the completion of March 23, 2017 inspection report, the overfill progress report dated April 5, 2017 (ADEQ # 71481) still showed Cell 1 E as off the lined area. The last progress report dated May 2, 2017 (ADEQ# 71712) had a completion report date of May 15, 2017.

According to the 2017 AEIR dated June 30, 2017 (ADEQ #72120), the over fill is identified as Cell 8A. To date, none of the over fills previously noted have been certified complete with the Overfill Management Plan. The facility is working toward correcting the alleged violations and has agreed to present a corrective action schedule to the ADEQ.

Date	12/12/2017	Signature of Inspector		Page	4

Fields & Associates, LLC

75 Norfork Drive **Maumelle, AR 72113**
Office: (501) 912-6381 **Fax: (866) 228-5146**

"Providing Innovative Solutions to the Solid Waste Industry"

January 10, 2018

Ms. Lori Burke
Solid Waste Management Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: CARDS Class 4 Landfill Inspection Response AFIN 60-04211, Permit No. 0314-S4

Dear Ms. Burke:

Central Arkansas Recycling & Disposal Services, LLC, (CARDS) is pleased to submit the following response to the inspection conducted by the ADEQ Solid Waste Division on December 12, 2017 at the above referenced facility.

The majority of the violations noted in the inspection are directly related to lack of weekly and interim soil cover placement. CARDS has completed the purchase of the property directly to the west of the landfill facility. This property will provide ample soil material for weekly and interim cover needs for the life of the facility. CARDS is currently having a boundary survey performed of the property to determine limits of excavation. Upon completion of this survey, CARDS will begin clearing, grubbing and developing a road into property. A permit from the Pulaski County Road Department for crossing Ironton Road has been applied for and is in the process of being completed.

While these activities are being performed for the new property, CARDS will prepare the landfill for the placement of cover soil. These activities will consist of removing all waste that exceeds permitted waste grades, repairing all leachate breakouts and compaction of the prepared area to provide a tight and stable surface for soil placement.

When all these actions stated above have been completed, CARDS will begin hauling and placing cover soil over all areas of exposed waste and any areas that require additional interim cover.

Due to the time of year and the many actions that are required to be completed, CARDS proposes to provide the ADEQ with weekly progress reports. These reports will document items completed, amount of soil hauled, photo documentation of activities, and any delays that have occurred and measures taken to overcome the delays.

CARDS will continue to work in earnest with the ADEQ to resolve any issues associated with this facility. In addition, CARDS will submit all required permit transfer documents within 30 days of the date of this letter. Please feel free to call me at (501) 912-6381 if I can be of additional assistance or if you have any questions.

Fields & Associates, LLC

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

Fields & Associates, LLC

75 Norfork Drive
Maumelle, AR 72113

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

"Providing Innovative Solutions to the Solid Waste Industry"

January 31, 2018

Ms. Lori Burke
Solid Waste Management Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: L&W Environmental, LLC Class 4 Landfill and Material Recovery Facility
Progress Report

Dear Ms. Burke:

Fields & Associates, on behalf of Central Arkansas Recycling & Disposal Services, LLC, is pleased to submit the progress for compliance related activities for the week of January 22-25, 2018. During this week the following tasks were completed:

Material Recovery Facility:

- Tires that were stockpiled on the east side of the property have removed and properly disposed
- Trash Carts and other waste located on the east side of the property have been removed and properly disposed.
- Timbers and other wood has been removed or organized to create a more professional appearance.
- Area on the north end of Facility has been graded to promote better drainage and direct stormwater away from shingle stockpiles
- Material Facility Drain is being maintained and waste removed as needed.
- Beneficial Fill area has been cleaned and loads of beneficial fill are being processed on a daily basis.

Class 4 Landfill:

- Overfill waste piles have been removed from the south slope.
- Soil has been stockpiled on top of facility for placement as soon as weather and field conditions permit.
- Working face has been covered and is being reduced in size.

CARDS and Fields & Associates will continue to provide the ADEQ progress report reports of compliance related activities. Attached to this letter are photos documenting the compliance related activities. 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



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

Cc: Mr. David Steinmetz, Managing Partner
Attachment: Photos



View to the North of Material Recovery Area



View to the South of Material Recovery Area



Placement of Weekly Cover View to Southwest Cell 10



Active Face Adjacent to Weekly Cover View to the Southwest



Material Recovery Facility View to the North East



View to East of North Shingle Road Berm



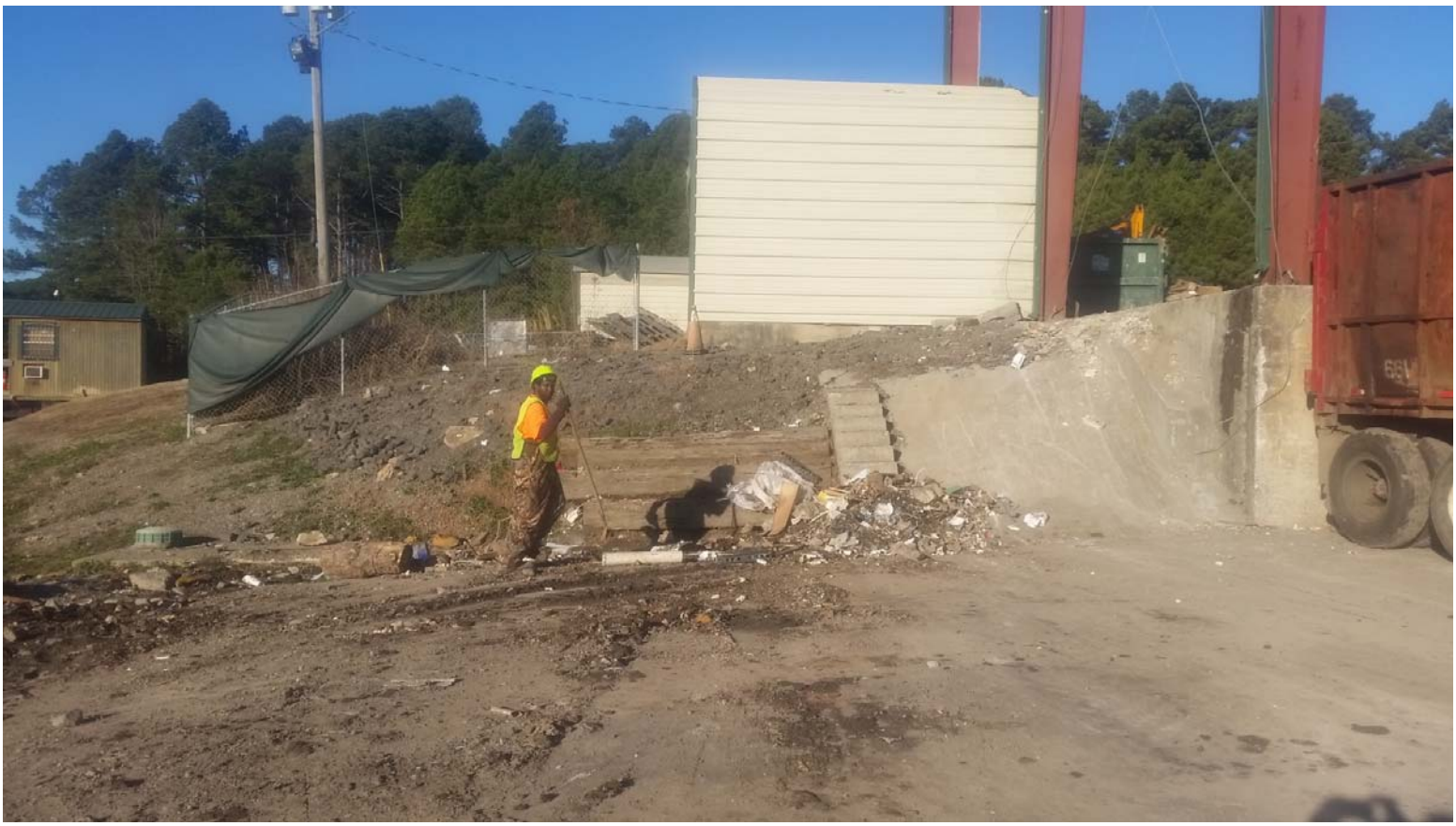
View to the North of Material Recovery Facility



View to the Northeast of Material Recovery Facility



View to the Southwest of Material Recovery Pad



Cleaning of Material Recovery Pad Drain



View to the North of Beneficial Fill Area



View to West of South Slope Overfill Removal



View to the North of Beneficial Fill Area



View to Northwest of North Shingle Road

Hayden, Ryan

From: Krou, Christopher
Sent: Monday, February 26, 2018 1:02 PM
To: Hayden, Ryan
Cc: Davenport, Kimberly
Subject: FW: L&W/CARDS Class 4 Landfill Status Update
Attachments: Feb 2018P.pdf

Please process this inspection response.

Thanks.

-----Original Message-----
From: Phillip [mailto:pfields@fieldsassociatesllc.com]
Sent: Monday, February 26, 2018 8:13 AM
To: Krou, Christopher; Johnson, Charles
Subject: L&W/CARDS Class 4 Landfill Status Update

Good Morning Chris,

Fields & Associates, LLC on behalf of CARDS is providing the ADEQ a status update on compliance activities at the L&W Class 4 Landfill and Material Recovery Facility (Facilities). Since the last report, CARDS has made significant progress in bringing the Facilities back into compliance. CARDS has improve the drainage on the Material Recovery Facility and has added crush rock to large portion of the property. CARDS has also began the process of placing intermediate cover on the Class 4 Landfill. This is being accomplish with three haul trucks (25 ton, 30 ton and a 45 ton truck), 2 D-6 Cat dozers and a trac hoe. This amount of equipment is capable of moving over 4,000 cubic yards of soil a day. A long term haul road was developed into the adjacent property for excavation and removal of soil.

The weather conditions this months have slowed the placement of cover soil. However there is minimal delay between storm events and CARDS can start moving soil less than one day after a storm. Currently the majority of the north and west slopes have received intermediate cover. In addition during last weeks storms ,CARDS utilized the downtime to regrade slopes and improve site conditions. This regrading will minimize erosion on the slopes and allow for easier maintenance. Upon completion of intermediate soil placement, CARDS will seed the slopes and install erosion control matting. These material have been ordered and will be available upon completion of cover placement.

Attached to this email are pictures of the compliance activities. Please feel free to call me if you have any questions or concerns.

Thank you

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



View to the Southeast of Material Recovery Sorting Pad



View to the Southwest of Maintenance Area



View to North of Material Recovery Facility



View to the Northeast of Material Recovery Facility



View to The east of Material Recovery Facility



View to the East of Material Recovery Facility



View to the East of Material Recovery Facility



Placement of Gravel Near Sorting Pad



Initial Construction of Borrow Area Haul Road Looking East



Initial Construction of Borrow Area Haul Road Looking West



Initial Construction of Borrow Area Haul Road



Placement of Rock for Borrow Area Haul Road Looking West



Borrow Area Prep for Cover Material Looking North



Additional View to the West of Borrow Area



Beginning of Cover Soil Placement



Cover Soil Stockpiles on Top Deck of Landfill View to the South



Cat 45 Ton Truck Placing Place



Placement of Cover Soil View to the South East



North Slope Cover Placement View to Northwest



Cover Slope Placement View to East



Additional Cover Soil and Grading of West Slope



View to the Southeast of West Slope



View to the South of West Slope