



March 22, 2018

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

**RE: Quarterly Inspection conducted on March 21, 2018**  
**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 blue 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 1 Landfill	<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>	102050
<b>Date</b>	3/21/2018	<b>Entry Time</b>	0930	<b>Exit Time</b>	1130


### 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											
X	411(h)(1)	Contouring prevents surface water flowing into or through waste					Surface water was standing on top of the landfill in Cell 3, which was not contoured to drain. (Refer to Photo #1.)						
	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											
	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			9/26/2017		Site Conditions		Dry				
423(b)		Date of last engineering report			3/5/ 2018		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			3/20/2018		Total # for month		11				
415, 421(e)		Date of last quarterly methane monitoring			12/28/2017		Detection level		0	415(a)	Explosive gas records current?	Yes/No	Yes
421(g),412(a)(2),701		Date of last special waste received			3/20/2018		Disposal location		Cell 1				
421(d)		Previous quarter waste received			20,689.10		Tons		4 <sup>th</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		Chris Puckett			Method	On-site			Date	3/21/2018		Time	1120

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

<b>Location</b>	Crittenden Co. Class I Landfill				<b>Permit</b>	0245-S1-R1	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector			<i>TB</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	1		<b>Date</b>	3/21/2018	<b>Time</b>	1027
<b>Description</b>	View of surface water standing on top of the landfill in Cell 3, looking east.							
								



A R K A N S A S  
Department of Environmental Quality

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***Regulated Waste Operations Compliance Branch***  
***OFFICE OF LAND RESOURCES***  
***ROUTING SLIP***

Date: 3/22/2018

Subj: Crittenden County Class 1 Landfill – 0245-S1-R1 Q1 2018 – Inspection Report

From: Tobin Baker, ADEQ Solid Waste Inspector

<u><i>Route in turn to:</i></u>	<u><i>Action Needed</i></u>	<u><i>Date Received</i></u>	<u><i>Date Reviewed</i></u>	<u><i>Initials</i></u>
Ryan Hayden	■Concurrence ■Review	<u>3/22/18</u>	<u>3/22/18</u>	<u>RH</u>
Chris Krou	■Concurrence ■Review	<u>3/22/18</u>	<u>3/22/18</u>	<u>gc</u>

***\*Note: Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.***

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**COMMENTS:**

**Blue, Karen**

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**To:** Baker, Tobin  
**Subject:** RE: ADEQ written response.docx

**From:** John Preston [<mailto:jpreston@santekenviro.com>]  
**Sent:** Thursday, March 29, 2018 4:49 PM  
**To:** Baker, Tobin  
**Cc:** David Hollinshead; Ron E. Vail; [judgewheeless@crittco.com](mailto:judgewheeless@crittco.com)  
**Subject:** ADEQ written response.docx

Mr. Baker

Hope everything is going well. I've attached the written response letter and corrective action plan to this email. The noted Allegation 411 (h) (i) have been addressed, and  
With your approval I would like to file this in our records as complete. Any question don't hesitate to contact me at (423)650-3095. Thanks John Preston Regional Manager.

Rec'd Digitally	
AFIN: 18-00094	
PMT#: 0245-S1-R1	
<div>RECEIVED By bluek at 3:41 pm, Apr 02, 2018</div>	S W M D
DOC ID#: 73506	
TO: RH>FILE <KMB	





March 29, 2018

Tobin Baker

Solid Waste Inspector

Office of Land Resources

**RE: Corrective Action Plan for Quarterly Inspection conducted on March 21, 2018**

**Permit Number 0245-S1-R1**

Dear Mr. Baker:

This letter is in Response to noted Allegation at The Crittenden County Class 1 Landfill, Located 1299 Khun Rd. West Memphis, AR 72301 Permit Number 0245-S1-R1.

As noted on your Routine Class 1 Landfill Inspection on 3/21/2018 Regulation 411 (h) (i) Contouring Prevents Surface Water Flowing Into or Through Waste was observed. (See picture below This picture was taken by SANTÉK WASTE SERVICES staff day of Quarterly Inspection March 21, 2018



**Corrective Action:**

Within 24hrs of Noted Allegations 411(h) (i) The Complete Area was surveyed. The Correction was made by cutting and filling in such away to allow for positive drainage. In addition Management has Trained Staff and Operators on the importance of Run on and Run off Procedures. (See Pictures Below of Correction Made.)

Top of Cell 3 looking East





Top of Cell 3 Looking North



As The pictures above illustrates That 411 (h)(i) has been corrected. If you have any further questions, please do not hesitate to contact me at (423)650-3095 or [jpreston@santekenviro.com](mailto:jpreston@santekenviro.com)

Sincerely,

John Preston

Regional Manager

