

December 3, 2018

Judge Mickey Pendegrass Ozark Mountain Regional Solid Waste Management District 1 East 7th Street, Suite 303 Mountain Home, AR 72653

RE: Quarterly Inspection conducted on November 20, 2018 AFIN 03-00051 Permit Number 0249-S1-R2

Dear Judge Pendegrass:

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 <u>et seq.</u>), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. At the time of the inspection, no allegations of noncompliance were noted at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at 501-837-6909 or norton@adeq.state.ar.us.

Sincerely, Dance Monton

Darrell Norton 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



| Site Name | NABORS Class 1 Landfill | County | Baxter | AFIN | 03-00051 | | | | | | |
|--|--|----------------|------------------------------|---------------|---------------------|--|--|--|--|--|--|
| Facility Address | Mountain Home, Hwy 5N to CR16 to site entrance | Phone Number | 870-425-3213 870-656-9463 | Permit Number | 0249-S1-R2 | | | | | | |
| Permittee Address | P.O. Box 1715, Mountain Home, AR, 72602 | E-Mail Address | | | PDS # 105606 | | | | | | |
| Date | 11/20/2018 | Entry Time | 1050 | Exit Time | 1200 | | | | | | |
| | Regulation 22 | – Operationa | l Standards | _ | - | | | | | | |
| | Ca | tegory 1 | | | | | | | | | |
| Regulation Item Description Comments | | | | | | | | | | | |
| 411(l) | Adequate employee facilities Site currently under closure project 9301601R. | | | | | | | | | | |
| 421(a)(b) | Record keeping meets requirements specified by regulations 2018 1 st half GWMR and Gas Monitoring reports received by ADEQ Remediation Group. | | | | | | | | | | |
| 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 AEIR has not been submitted since 2013. Site currently under closure project 930160R. | | | | | | | | | | |
| 422 | Facility implements operating plan and narrative | | | | | | | | | | |
| 421(f) | Leachate disposal/recirculation records 636,000 gallons of leachate hauled 1 st half of 2018. Document #73895 addresses current leachate contract held by Harbor Environmental. Leachate sampling conducted April 18, 2018. | | | | | | | | | | |
| 421(g),701 | Special waste disposal and procedures records | | | | | | | | | | |
| | Cate | egory 2 | | | | | | | | | |
| Regulation | Item Description | | Comments | | | | | | | | |
| 411(a) | Operations in accordance with permit documents | | | | | | | | | | |
| 417(c) | 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 D | | | Comments | | | | | | | |
| | 427 | Surface Wat | er Controls | | | | | | | | | | |
| | 411(h)(1) | Contouring | prevents surface wa | ough waste | <u>,</u> | | | | | | | | |
| | 418(a)(b) | Run-on/off c | ontrol system prese | nt and adequate | | | | | | | | | |
| | 411(h)(2) | Surface wat | er control prevents | off-site sediment accum | ulation | | | | | | | | |
| | 411(i);427(f) | Adequate m | Adequate maintenance of intermediate/final cover vegetation | | | | | | | | | | |
| | 415 | Gas monitor | s monitoring program | | | | | | | | | | |
| | 411(o) | Leachate lea | nate leaks or evidence of leachate seepage | | | | | | | | | | |
| | 426 | Survey cont | irvey controls | | | | | | | | | | |
| | 429 | Leachate col | Leachate collection system | | | | | | | | | | |
| | 420 | Liquid Restrictions | | | | | | | | | | | |
| Category 3 | | | | | | | | | | | | | |
| | Regulation | Item Description | | | | | | | | Comments | - | | |
| | 412 | Implementa | tion of hazardous/u | usion plan | | | | | | | | | |
| | 413(a)(b) | Satisfactory | daily/alternative co | ver | | | | | | | | | |
| | 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(0) | Erosion or o | ther cover defects r | esulting in exposed refu | ise | | | | | | | | |
| | 309(c) | Overfill/Off lined area | | | | | | | | | | | |
| | | I | |] | Regula | tion 22 | - Reco | ords | | | | | |
| 42 | 421(a)(8), 1203(k) Date of la | | te of last groundwater monitoring report | | | 9/27/2017 Site Conditions | | | | Dry | - | | |
| | 423(b) | 423(b) Date of last engineering report | | | 9/16/201 | 3 | Weather | Condition | IS | Sunny | | | |
| | 428 | | | Notice of | f liner cons | truction | Yes/No | No | Third party CQA on-site during construction Yes/No N/A | | | | |
| | 412(a) | | | N/A | | | or month | 0 | | | | | |
| | 415, 421(e) | | | | 12/27/20 | | Detection | | 0 PO | C 415(a) Explosive gas records current? Yes/No no | | | |
| 421(g | 1(g),412(a)(2),701 Date of last special waste received | | | | 10/26/20 | | Disposal | location | | | | | |
| | | | | | None sinc Yes/No | e 12/2012 | Tons | | | | | | |
| T | 427(c) | | r DMR records cur | | | · · · · · · · · · · · · · · · · · · · | , V | es/No No | | | | | |
| Faye | tteville Shale Rela | ted | Yes/No No | Out of Compliance v | with Faye | tteville Sh | ale ¹ | Xes/No No |) | | | | |
| Oper | Operator Name & Number N/A | | | | | | Signatu | re of Insp | ector | Dance Monton | | | |
| Exit 1 | Interview Conduc | ted with | N/A | | Method | N/A | | | Date | N/A Time N/A | | | |

| Location | NA | ABO | ORS C | Class 1 | Landfill | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
|---|----|-----|---------|----------|----------------------|----------|------------|----------------|------|----------|
| PhotographerDarrell Norton, ADEQ Solid Waste InspectorM | | | | Witness | N/A | | | | | |
| Photo # | 1 | | Of | 4 | | | Date | 11/20/2018 | Time | 1058 |
| Description | | P | A view | v of the | signage and entra | nce road | to the Nab | oors landfill. | | |
| | | | Y I I I | | | | | 2018.11.20 1 | 0:58 | |
| Location | N | AB | ORS (| Class 1 | Landfill | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| LocationNABORS Class 1 LandfillPhotographerDarrell Norton, ADEQ Solid Waste InspectorM | | | | | | ۶w | Witness | N/A | | |
| Photo # | 2 | | Of | 4 | | | Date | 11/20/2018 | Time | 1106 |
| Description | | N | New g | ated ent | trance at the entrai | nce to A | rea 1-3. | 1 | | • |
| | | | | | | | | | | |

Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

NABORS Class 1 Landfill 0249-S1-R2 Location Permit AFIN 03-00051 Darrell Norton, ADEQ Solid 3N N/A Photographer Witness Waste Inspector Photo # 3 Of 4 Date 11/20/2018 Time 1116 A view of the leachate panel and riser on the south slope of Cell 2 in Area 1-3. Description NABORS Class 1 Landfill 03-00051 Location Permit 0249-S1-R2 AFIN Darrell Norton, ADEQ Solid 3N N/A Photographer Witness Waste Inspector 4 Of 11/20/2018 1118 Photo # Date Time 4 Description A view of the leachate tank farm and secondary containment unit.

Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet