



February 21, 2019

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

**RE: Quarterly Inspection conducted on February 4, 2019**  
**AFIN 18-00094**  
**Permit Number 0245-S1-R2**

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. A copy of the inspection report is attached.

You should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the attached report. Written notification of the corrective actions taken, or to be taken, for the alleged violations must be submitted within thirty (30) calendar days from the date of this letter to the attention of Tobin Baker. This written notification could include, but not be limited to, photographs, receipts, or analytical results, documenting correction of violations. If you have any questions, 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 1	<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-R2
<b>Permittee Address</b>	Crittenden Co. Judge	<b>E-Mail Address</b>	arredllc@swb.net	<b>PDS #</b>	106640
<b>Date</b>	2/4/2019	<b>Entry Time</b>	1300	<b>Exit Time</b>	1515


### 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	The working face was approximately 150' X 300'. (Refer to Photos #1 & #2.)
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					
X	427	Surface Water Controls				Standing water observed on interim cover on top of the landfill in Cell 1A. (Refer to Photo #6.)					
	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 observed in Cell 1A and on the east slope of Cell 3. (Refer to Photos #3 & #5.)					
	426	Survey controls									
X	429	Leachate collection system				Hi-level alarm light observed flashing at leachate control panel in Cell 2A, which read 102.1". (Refer to Photo #4.)					
	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		7/2/2018		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	
412(a)		Date of last random inspection for unauthorized waste		2/4/2019		Total # for month		22			
415, 421(e)		Date of last quarterly methane monitoring		12/14/2018		Detection level		0	415(a)	Explosive gas records current?	
421(g),412(a)(2),701		Date of last special waste received		1/25/2019		Disposal location		Cell 4			
421(d)		Previous quarter waste received		17,098.76		Tons					
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		Dallis Bugg		Method	On-site		Date	2/4/2019		Time	1505



# Official Photograph Sheet

<b>Location</b>	Crittenden Co. Class 1 Landfill				<b>Permit</b>	0245-S1-R2	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	6		<b>Date</b>	2/4/2019	<b>Time</b>	1330
<b>Description</b>	Working face observed with measurements approximately 150' X 300'.							



<b>Location</b>	Crittenden Co. Class 1 Landfill				<b>Permit</b>	0245-S1-R2	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	6		<b>Date</b>	2/4/2019	<b>Time</b>	1330
<b>Description</b>	Working face observed with measurements approximately 150' X 300'.							





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**Official Photograph Sheet**

<b>Location</b>	Crittenden Co. Class 1 Landfill			<b>Permit</b>	0245-S1-R2	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector		TB	<b>Witness</b>	N/A		
<b>Photo #</b>	3	<b>Of</b>	6	<b>Date</b>	2/4/2019	<b>Time</b>	1343
<b>Description</b>	Leachate leaks observed on the east slope of Cell 3.						



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<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector		TB	<b>Witness</b>	N/A		
<b>Photo #</b>	4	<b>Of</b>	6	<b>Date</b>	2/4/2019	<b>Time</b>	1347
<b>Description</b>	Hi level alarm light observed flashing at leachate pump control panel for Cell 2A.						



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<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector		TB	<b>Witness</b>	N/A		
<b>Photo #</b>	5	<b>Of</b>	6	<b>Date</b>	2/4/2019	<b>Time</b>	1357
<b>Description</b>	Leachate leaks observed in Cell 1A.						



<b>Location</b>	Crittenden Co. Class 1 Landfill			<b>Permit</b>	0245-S1-R2	<b>AFIN</b>	18-00094
<b>Photographer</b>	Tobin Baker, ADEQ Solid Waste Inspector		TB	<b>Witness</b>	N/A		
<b>Photo #</b>	6	<b>Of</b>	6	<b>Date</b>	2/4/2019	<b>Time</b>	1403
<b>Description</b>	Standing water observed on interim cover on top of the landfill in Cell 1A.						

