



April 30, 2019

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

RE: Quarterly Inspection conducted on April 22, 2019
AFIN 18-00094
Permit Number 0245-S1-R2

Dear Judge 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.

Sincerely,

A handwritten signature in blue ink that reads "Tobin Baker".

Tobin Baker
Solid Waste Inspector
Office of Land Resources

Attachment

cc: Kevin White, Associate Director, Office of Land Resources



Arkansas Department of Environmental Quality

Office of Land Resources -Solid Waste Management

Class 1 Landfill Inspection



Site Name	Crittenden County Class 1	County	Crittenden	AFIN	18-00094
Facility Address	1299 Khun Rd. West Memphis, AR 72301	Phone Number	LF: 870-732-4290 Off: 870-732-6580	Permit Number	0245-S1-R2
Permittee Address	Crittenden Co. Judge	E-Mail Address	arredllc@swb.net	PDS #	107595
Date	4/22/2019	Entry Time	1030	Exit Time	1240


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 observed in Cell 1A. (Refer to Photo #4.)						
	426	Survey controls											
X	429	Leachate collection system					Hi level alarm light observed flashing at leachate pump control panel in Cell 2A which read 79.0" and at the leachate control panel in Cell 1A which read 85.0".(Refer to Photo #1, - #3.)						
	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			11/29/2018		Site Conditions		Dry					
423(b)	Date of last engineering report			4/18/ 2019		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			4/22/2019		Total # for month		13					
415, 421(e)	Date of last quarterly methane monitoring			2/26/2019		Detection level		0	415(a)	Explosive gas records current?		Yes/No	Yes
421(g),412(a)(2),701	Date of last special waste received			4/22/2019		Disposal location		Cell 4					
421(d)	Previous quarter waste received			16,182.90		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	4/22/2019		Time	1235		

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Crittenden Co. Class 1 Landfill			Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, ADEQ Solid Waste Inspector		<i>TB</i>	Witness	N/A		
Photo #	1	Of	4	Date	4/22/2019	Time	1048
Description	Hi level alarm light observed flashing at leachate pump control panel in Cell 2A, which read 79".						
							
Location	Crittenden Co. Class 1 Landfill			Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, ADEQ Solid Waste Inspector		<i>TB</i>	Witness	N/A		
Photo #	2	Of	4	Date	4/22/2019	Time	1053
Description	Hi level alarm light observed flashing at leachate pump control panel for Cell 1A.						
							

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Crittenden Co. Class 1 Landfill				Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, ADEQ Solid Waste Inspector			<i>TB</i>	Witness	N/A		
Photo #	3	Of	4		Date	4/22/2019	Time	1053
Description	Leachate pump control panel in Cell 1A, which read 85".							
								
Location	Crittenden Co. Class 1 Landfill				Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, ADEQ Solid Waste Inspector			<i>TB</i>	Witness	N/A		
Photo #	4	Of	4		Date	4/22/2019	Time	1105
Description	Leachate leaks observed in Cell 1A.							
								