

August 1, 2019

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

RE: Quarterly Inspection conducted on July 23, 2019

AFIN 18-00094

Permit Number 0245-S1-R2

Dear Judge Wheeless:

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. The inspection identified conditions at your facility which the ADEQ alleges constitutes violations. A copy of the inspection report is attached.

You should immediately initiate actions to correct the alleged violations cited. A written response of the corrective actions taken, or to be taken, must be submitted within thirty (30) calendar days from the date on this letter to the attention of Tobin Baker. The response may include, but is not limited to, photographs, copies of disposal receipts, records, or analytical results, as applicable. If you have any questions regarding the alleged violations, please do not hesitate to contact me at (870) 935-7221 or bakert@adeq.state.ar.us.

Sincerely,

Tobin Baker

Solid Waste Inspector

Jobin Baker

Office of Land Resources

Enclosure

cc: David Witherow P.E., Senior Manager, 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 Landfill	County	Crittenden	AFIN	18-00094					
Facility Address	1299 Khun Rd.	Phone Number	LF: 870-732-4290	Permit Number	0245-S1-R2					
	West Memphis, AR 72301		Off: 870-732-6580							
Permittee Address		E-Mail Address	arredllc@swb.net		PDS # 108752					
Date	7/23/2019	Entry Time	0900	Exit Time	1100					
	Regulation 22	2 – Operation	al Standards							
	Ca	tegory 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 enginee	er								
422	Facility implements operating plan and narrative									
421(f)	Leachate disposal/recirculation records									
421(g),701	Special waste disposal and procedures records									
_	Ca	ategory 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 fac	ce								
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									

							Ca	ntegor	y 2 (con	tinued)						
	Regulation	Item Description						Ĭ	Comments							
	427	Surface Water Controls														
	411(h)(1)	Contouring prevents surface water flowing into or through waste						e								
	418(a)(b)	Run-on/off control system present and adequate														
	411(h)(2)	Surface water	control	prevents	off-site sed	iment accum	nulation									
	411(i);427(f)	Adequate mai														
	415	Gas monitorin														
v	411(0)	Leachate leaks			achate seei	nage		Lea	rhate leak	s observed in	Cell 3 ((Refer to Photo	#1)			
Λ	426	Survey contro		defice of ice	denate see	page		Bea		3 003CI ved III	CON 3. ((Refer to Thoto				
		-		4												
	429	Leachate colle		stem												
	420	Liquid Restric	tions													
							Ca	tegor	y 3							
	Regulation			Item D	escriptio	n						Co	mments			
	412	Implementation	on of ha	zardous/uɪ	nauthorize	d waste excl	usion plan	ı								
	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 lin				- Posta Pere		Ove	rfill obser	ved on top of	the lan	dfill and at the	base of the east s	slope of the land	lfill (Refer to	Photo #2.)
	Overmiton med area							The	The facility disclosed this information to ADEQ. Santek Waste Connections is working on the facility's Overfill Management Plan for submittal to ADEQ. (Refer to Doc #76814 & #76816.)							
							Regul	•		ecords	ior subii	intui to ADEQ.	(Refer to Doe #7	0014 & 1170010	,.,	
42	1(a)(8), 1203(k)	Date of last gro	undwat	ter monito	ring repor	t	2/22/201			onditions		Dry				
	423(b)	Date of last eng	ineerin	g report			4/18/ 20	19	Weath	er Condition	ıs	Sunny				
	428	Liner construc			Yes/No	No		f liner co			No		CQA on-site du	ring constructi	on Yes/No	No
	412(a)	Date of last ran				rized waste	7/22/201			# for month	15		1			
101	415, 421(e)	Date of last qua					5/28/201			ion level	0	415(a)	Explosive gas	s records curre	nt? Yes/No	Yes
421	(g),412(a)(2),701	Date of last spe			d		5/28/201			sal location	Cell	. 4				
	421(d) 427(c)	Previous quart Surface water			rent?		Yes/No	Yes	Tons							
Fav	vetteville Shale R		es/No			ompliance v	vith Fave		hale	Yes/No No)					
	Operator Name & Number Ed Jackson- 001217				•	v			ture of Insp	oector	Tob	14 Boker				
Exi	t Interview Cond	lucted with	Dallis Bı	ugg			Method	On-site	<u> </u>		Date	7/23/2019		Time	1050	

Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

Location	Crit			ss 1 Landfill		Permit	0245-S1-R2	AFIN	18-00094
Photograph	er	Tobin Waste	Baker, A Inspect	ADEQ Solid or	TB	Witness	N/A		
Photo #	1	Of	2			Date	7/23/2019	Time	0958
Description		Leacha	ite leaks	s observed in Ce	ell 3.				
Location Photograph		Tobin	Baker,	ss 1 Landfill ADEQ Solid	TB	Permit Witness	0245-S1-R2 N/A	AFIN	18-00094
			Inspect	or	18			I mi	1024
Photo # Description	2	Overfil	2	ved on top of the	a landfill	Date	7/23/2019	Time	1024
							07 2010		

Blue, Karen

To: Coker, Cristina

Subject: RE: Notification of Overfill at Crittenden County Class 1 Landfill

From: Coker, Cristina

Sent: Tuesday, July 30, 2019 11:27 AM

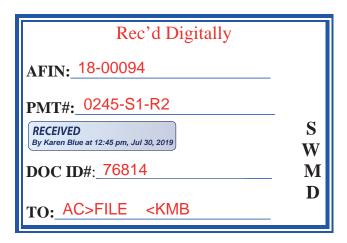
To: Cusher, Annette; Rich, Jay; Witherow, David

Subject: Notification of Overfill at Crittenden County Class 1 Landfill

Good Morning Everybody,

This morning, Judge Wheeless (Crittenden County Judge) and Mr. Vail (Santek Waste Services) called me to notify about an overfill present at the Crittenden County Class 1 Landfill. In addition, Mr. Vail reported that Santek Waste Connections is working on the facility's Overfill Management Plan for submittal to ADEQ.

Thank you,
Cristy Coker
Engineer
Office of Land Resources
Arkansas Department of Environmental Quality
(501)-682-0603
coker@adeq.state.ar.us



Blue, Karen

To: Coker, Cristina

Subject: RE: Crittenden County Landfill Overfill Certification Points

From: Ron E. Vail [mailto:rvail@santekwasteservices.com]

Sent: Tuesday, July 30, 2019 10:55 AM

To: Coker, Cristina

Cc: Jason Woody; judge@crittco.com

Subject: Crittenden County Landfill Overfill Certification Points

Christy,

Per our conversation I wanted to send you the overfill certification points and removal plan for the Crittenden County Landfill. We'll be sending a hard copy in the mail as well. Let me know if you have any questions. We'll notify ADEQ once the overfill has been relocated.

Thanks,

Ron E. Vail, P.E.

Executive Vice President of Engineering Santek Waste Services, LLC.

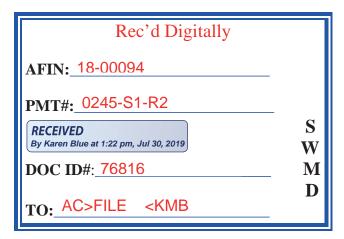
650 25th Street N.W. Suite 100

Cleveland, TN 37311

Office: (423) 303-7101 Fax: (423) 479-1952 Email: rvail@santekwasteservices.com

Website: http://santekwasteservices.com







650 25th Street, N.W., Suite 100 Cleveland, Tennessee 37311 (423) 303-7101

Email: info@santekwasteservices.com Internet: santekwasteservices.com Ms. Cristina Coker Arkansas Department of Environmental Quality Solid Waste Management Division 5301 Northshore Drive North Little Rock, AR 72118-5317

RE: Crittenden County Landfill Overfill Certification Points

AFIN: 18-00094

Permit No.: 0245-S1-R1

Dear Ms. Coker

On July 10, 2019, Santek Waste Services, LLC (Santek) calculated volumetric numbers on the 2019 aerial topographic survey flown at the Crittenden County Landfill. The aerial indicated the landfill may potentially contain two areas of overfill, totaling approximately 19,654 CY. As ADEQ is aware, an aerial topographic survey is not as accurate as a site survey in localized areas. Therefore, a field survey was performed to determine the surface elevations at 15 points within the potential overfill areas. Santek received the data from the surveyor on July 29, 2019 and verified the overfill.

In accordance with ADEQ Regulation 22.309(c), Santek is submitting this Overfill Removal Plan to relocate the overfill within the permitted grades to achieve compliance in the two areas. An Overfill Certification Map has been attached showing the limits of the two overfill areas. Also included on the map is a survey certification points table. Once the overfill is removed, the certification points will be resurveyed in order to show compliance.

If you have any question or require additional information, please give me a call at (423) 303-7101.

Sincerely,

Ron E. Vail, P.E.

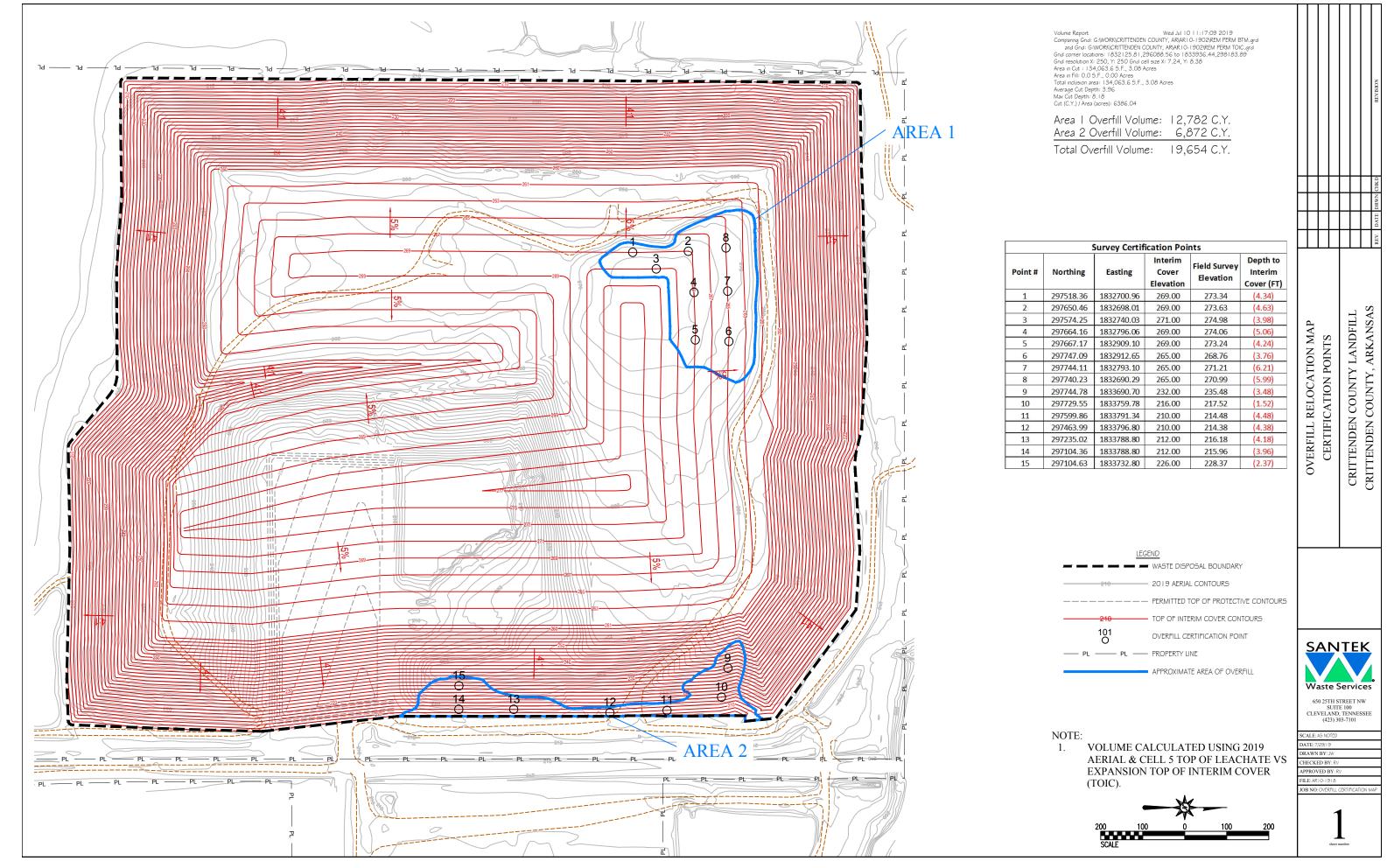
Executive V.P. of Engineering

Enclosure

cc: Honorable Woody Wheeless, County Judge, Crittenden County

Matt Dillard, Executive V.P. of Operations, Santek

John Preston, Interim Manager, Santek Dallas Bugg, Landfill Manager, Santek



WORKICRITTENDEN COUNTY, ARAR10-1918 (Overfill Removal)/OVERFILL CERTIFICATION MAP. dwg. 7/30/2019 11:22:13 AM, DWG TO PDF.pc3