

September 4, 2019

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

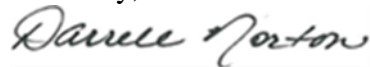
RE: Quarterly Inspection conducted on August 29, 2019
AFIN 03-00051
Permit Number 0249-S1-R2

Dear Judge Pendergrass:

The Arkansas Division of Environmental Quality (DEQ) Office of Land Resources 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. At the time of the inspection, no allegations of noncompliance were observed 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,



Darrell Norton
Solid Waste Inspector
Office of Land Resources

Enclosure

cc: David Witherow P.E., Senior Manager, Office of Land Resources

**Arkansas Division 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	Hwy 5 N to CR 16 to site entrance- Three Brothers	Phone Number	870-425-3213	Permit Number	0249-S1-R2
Permittee Address	P.O. Box 1715, Mountain Home, AR 72602	E-Mail Address		PDS #	109199
Date	8/29/2019	Entry Time	1029	Exit Time	1135

Regulation 22 – Operational Standards

Category 1

Regulation	Item Description	Comments
411(l)	Adequate employee facilities	Site closed under project 9301601R.
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	Site closed under project 9301601R.
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	
411(o)	Leachate leaks or evidence of leachate seepage	
426	Survey controls	
429	Leachate collection system	Multiple leachate panel alarms activated at the time of the inspection. Alarms activated on the west side of Area 1-3 (LCS-5) and on the southeast corner of Area 1-2 (LCS-2). Alarm light also activated on VLCS-1.
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	April 2019	Site Conditions	Dry				
423(b)	Date of last engineering report	9/16/2013	Weather Conditions	Sunny				
428	Liner construction in progress	Yes/No No	Notice of liner construction	Yes/No N/A	Third party CQA on-site during construction	Yes/No N/A		
412(a)	Date of last random inspection for unauthorized waste	N/A	Total # for month	N/A				
415, 421(e)	Date of last quarterly methane monitoring	April 2019	Detection level	100% GP-16	415(a)	Explosive gas records current?	Yes/No	yes
421(g),412(a)(2),701	Date of last special waste received	10/26/2012	Disposal location	N/A				
421(d)	Previous quarter waste received	None since 12/2012	Tons					
427(c)	Surface water DMR records current?	Yes/No						
Fayetteville Shale Related	Yes/No No	Out of Compliance with Fayetteville Shale	Yes/No	no				
Operator Name & Number	N/A		Signature of Inspector	<i>Darrell Norton</i>				
Exit Interview Conducted with	N/A	Method	N/A	Date	N/A	Time	N/A	

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, ADEQ Solid Waste Inspector		<i>DN</i>	Witness	N/A		
Photo #	1	Of	6	Date	8/29/2019	Time	1045
Description	The tank farm and secondary containment unit, with the east slope of Area 1-2 in the background.						
							
Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, DEQ Solid Waste Inspector		<i>DN</i>	Witness	N/A		
Photo #	2	Of	6	Date	8/29/2019	Time	1049
Description	LCS-5 with active alarm on the west slope of Area 1-3.						
							

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, ADEQ Solid Waste Inspector		<i>DN</i>	Witness	N/A		
Photo #	3	Of	6	Date	8/29/2019	Time	1054
Description	A view of Areas 1-3 and 1-2 from atop the Class 4 site.						
							
Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, DEQ Solid Waste Inspector		<i>DN</i>	Witness	N/A		
Photo #	4	Of	6	Date	8/29/2019	Time	1104
Description	LCS-2 with active alarm.						
							

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, ADEQ Solid Waste Inspector		<i>DN</i>	Witness	N/A		
Photo #	5	Of	6	Date	8/29/2019	Time	1124
Description	Closed office site.						
							
Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, DEQ Solid Waste Inspector		<i>DN</i>	Witness	N/A		
Photo #	6	Of	6	Date	8/29/2019	Time	1127
Description	VLCS-1 with alarm light activated.						
							