

ARKANSAS

ENERGY & ENVIRONMENT

ENVIRONMENTAL QUALITY

November 4, 2019

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

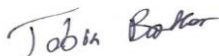
RE: Quarterly Inspection conducted on October 29, 2019
AFIN 18-00094
Permit Number 0245-S1-R2

Dear Judge Wheelless:

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) 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 DEQ 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
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 | Crittenden County Class 1 Landfill | 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 | 100 Court Street Marion, AR 72364 | E-Mail Address | arredllc@swb.net | PDS # | 109936 |
| Date | 10/29/2019 | Entry Time | 1000 | 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 3. (Refer to Photo #1.) | | | | | |
| | 426 | Survey controls | | | | | | | | | | |
| | 429 | Leachate collection system | | | | | | | | | | |
| | 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 | | | 8/26/2019 | | Site Conditions | | Wet | | | |
| 423(b) | | Date of last engineering report | | | 4/18/ 2019 | | Weather Conditions | | Cloudy | | | |
| 428 | | Liner construction in progress | | | Yes/No | | No | | Notice of liner construction | | Yes/No | |
| | | | | | | | | | Third party CQA on-site during construction | | Yes/No | |
| | | | | | | | | | | | No | |
| 412(a) | | Date of last random inspection for unauthorized waste | | | 10/29/2019 | | Total # for month | | 25 | | | |
| 415, 421(e) | | Date of last quarterly methane monitoring | | | 9/30/2019 | | Detection level | | 0 | | 415(a) | |
| 421(g),412(a)(2),701 | | Date of last special waste received | | | 10/29/2019 | | Disposal location | | Cell 4 | | | |
| 421(d) | | Previous quarter waste received | | | 23,100.06 | | 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 | | 10/29/2019 | |
| | | | | | | | | | Time | | 1230 | |

Arkansas Division of Environmental Quality

Official Photograph Sheet

| | | | | | | | | |
|---------------------|--|--|---|-----------|----------------|------------|-------------|----------|
| Location | Crittenden County Class 1 Landfill | | | | Permit | 0245-S1-R2 | AFIN | 18-00094 |
| Photographer | Tobin Baker, DEQ Solid Waste Inspector | | | <i>TB</i> | Witness | N/A | | |
| Photo # | 1 | Of | 2 | | Date | 10/29/2019 | Time | 1008 |
| Description | Leachate leaks observed in Cell 3. | | | | | | | |
| | |  | | | | | | |
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