

ARKANSAS

ENERGY & ENVIRONMENT

ENVIRONMENTAL QUALITY

November 7, 2019

Mr. Robert Hendrix
Craighead SWDA
P.O. Box 16777
Jonesboro, AR 72403

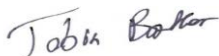
RE: Quarterly Inspection conducted on November 5, 2019
AFIN 16-00923
Permit Number 0254-S1-R4

Dear Mr. Hendrix:

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	Legacy Landfill	County	Craighead	AFIN	16-00199
Facility Address	238 CR 476 Jonesboro, AR 72404	Phone Number	870-972-6353	Permit Number	0254-S1-R4
Permittee Address	P.O. Box 16777, Jonesboro AR 72403	E-Mail Address	rhendrix@ccswda.com	PDS #	109980
Date	11/5/2019	Entry Time	1030	Exit Time	1235

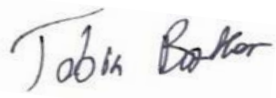
Regulation 22 – Operational Standards

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 on the east slope of 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												
X	411(o)	Erosion or other cover defects resulting in exposed refuse						Erosion with exposed waste observed on the south slope of Cell 4 Unit 2 by 360 elevation bench road. (Refer to Photo #2.)						
	309(c)	Overfill/Off lined area												
Regulation 22 - Records														
421(a)(8), 1203(k)		Date of last groundwater monitoring report			8/6/2019		Site Conditions		Dry					
423(b)		Date of last engineering report			3/29/2019		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			10/31/2019		Total # for month		22					
415, 421(e)		Date of last quarterly methane monitoring			8/20/2019		Detection level		0 LEL	415(a)	Explosive gas records current?		Yes/No	Yes
421(g),412(a)(2),701		Date of last special waste received			11/1/2019		Disposal location		Cell 2/3					
421(d)		Previous quarter waste received					Tons		Class 1- 24,718.64 Class 4-10,034.43					
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		Robert Hendrix 00336					Signature of Inspector							
Exit Interview Conducted with		Angela Sparks/Tim Mayne			Method	On-site			Date	11/5/2019		Time	1225	

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	Legacy Landfill				Permit	0254-S1-R4	AFIN	16-00199
Photographer	Tobin Baker, Solid Waste Inspector			<i>TB</i>	Witness	N/A		
Photo #	1	Of	2		Date	11/5/2019	Time	1118
Description	Leachate leaks observed on the east slope of Cell 3.							
								
Location	Legacy Landfill				Permit	0254-S1-R4	AFIN	16-00199
Photographer	Tobin Baker, Solid Waste Inspector			<i>TB</i>	Witness	N/A		
Photo #	2	Of	2		Date	11/5/2019	Time	1129
Description	Erosion with exposed waste observed on the south slope of Cell 4 Unit 2 by 360 elevation bench road.							
								

Blue, Karen

To: Baker, Tobin
Subject: RE: Response to November Quarterly Landfill Inspection

From: rhendrix@ccswda.com [<mailto:rhendrix@ccswda.com>]

Sent: Thursday, December 19, 2019 3:40 PM

To: Baker, Tobin

Cc: 'Angela Sparks'; David Passmore; Bob Blankenship; Brett Provost; 'Dan Shaw'; Dennis Burks; Derek McCormick; 'Garry Tate'; Jon Milligan; Kapil Bajaj; 'Kevin Orr'; Mitchell Fitts; Rick Miles; Wayne Bond; Willis Tyler

Subject: Response to November Quarterly Landfill Inspection

Attached is our response to your November 5, 2019 inspection report.

As a side note I am not receiving conventional mail nor e-mail correspondence from the Division of Environmental Quality of these inspections. I receive most other documents and e-mails but I have not gotten the inspection reports in over a year. I have to remember when you were here and go out to the data base on the DEQ website and pull the reports down. Could you inquire about this for me please?

Thank you and again we appreciate your cooperation.

Merry Christmas!

Robert D. Hendrix, PE, Ex. Dir.

Craighead County Solid Waste Disposal Authority

PO Box 16777 – 238 CR 476

Jonesboro, AR 72403

Ph (870) 972-6353 ext. 5

FAX (870) 972-0495

E-mail: rhendrix@ccswda.com

Rec'd Digitally	
AFIN: <u>16-00199</u>	
PMT#: <u>0254-S1-R4</u>	
RECEIVED By Karen Blue at 8:37 am, Dec 20, 2019	
DOC ID#: <u>77418</u>	
TO: <u>RH>FILE <KMB</u>	
	S W M D

Craighead County Solid Waste Disposal Authority

P.O. Box 16777 • Jonesboro, AR 72403 • 870-972-6353 • fax: 870-972-0495

December 19, 2019

Mr. Tobin Baker, ADEQ Inspector
Solid Waste Management Division
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

Re: Fourth Quarterly Inspection; AFN16-00199; Permit Number 0254-S1-R4

Dear Mr. Baker:

I have reviewed the latest Quarterly Inspection Report dated November 05, 2019 and would like to address your comments in the following paragraphs.

Reg. 22.411 (o) Erosion or other cover defects resulting in exposed refuse.

Comments: Leachate leaks observed on the east slope of Cell 3. (Refer to Photo #1.)



ADEQ Photo #1

Response: Due to extremely wet conditions our repairs were delayed; however, the erosion was repaired on December 12, 2019. (See CCSWDA Photo #1).



CCSWDA Photo #1

Reg. 22.411 (o) Erosion or other cover defects resulting in exposed refuse.

Comments: Erosion with exposed waste observed on the south slope of Cell 4 Unit 2 by 360 elevation bench road. (Refer to Photo #2.)



ADEQ Photo #2

Response: Due to extremely wet conditions our repairs were delayed; however, the erosion was repaired on December 12, 2019. (See CCSWDA Photo #2).



Mr. Baker, I sincerely appreciate you working with us and the cooperation we receive during these inspections. I can assure you and the Department that we will continue with all diligence to maintain the Legacy Landfill to the very best of our ability and in accordance with Regulation 22.

Thanks again for your understanding and consideration.

Respectfully,

A handwritten signature in blue ink that reads 'Robert D. Hendrix'.

Robert D. Hendrix, PE, CFM
Executive Director

RDH:rdh

CC: CCSWDA Board; CCSWDA Staff