

December 6, 2019

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

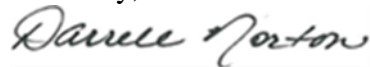
**RE: Quarterly Inspection conducted on November 25, 2019**  
**AFIN 03-00051**  
**Permit Number 0249-S1-R2**

Dear Judge Pendegrass:

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. 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](mailto: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

**Division of Environmental Quality  
Office of Land Resources - Solid Waste Management  
Class 1 Landfill Inspection**



|                          |   |                       |              |                      |            |
|--------------------------|---|-----------------------|--------------|----------------------|------------|
| <b>Site Name</b>         | NABORS Class 1 Landfill                           | <b>County</b>         | Baxter       | <b>AFIN</b>          | 03-00051   |
| <b>Facility Address</b>  | Hwy 5 N to CR 16 to site entrance- Three Brothers | <b>Phone Number</b>   | 870-425-3213 | <b>Permit Number</b> | 0249-S1-R2 |
| <b>Permittee Address</b> | P.O. Box 1715, Mountain Home, AR 72602            | <b>E-Mail Address</b> |              | <b>PDS #</b>         | 110281     |
| <b>Date</b>              | 11/25/2019  | <b>Entry Time</b>     | 1142         | <b>Exit Time</b>     | 1310       |

**Regulation 22 – Operational Standards**

**Category 1**

| <b>Regulation</b> | <b>Item Description</b>  | <b>Comments</b>                                   |
|-------------------|--|---|
| 411(l)            | Adequate employee facilities                                     | Site closed under project 9301601R.               |
| 421(a)(b)         | Record keeping meets requirements specified by regulations       |   |
| 417               | Access requirements  | Gate locked/closed at the time of the inspection. |
| 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**

| <b>Regulation</b> | <b>Item Description</b>  | <b>Comments</b> |
|-------------------|--|-----------------|
| 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                                      | Alarm light activated on VLCS-1. (Refer to Photo #1.) Secondary containment unit valve leak observed. (Refer to Photo #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            | April 2019         | Site Conditions              | Damp                                      |        |   |        |     |      |     |
| 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 |   | None               |                              | Method                                    | n/a    |   | Date   | n/a | Time | n/a |

## Division of Environmental Quality Official Photograph Sheet

|                     |                                     |           |           |                |            |             |          |
|---------------------|-------------------------------------|-----------|-----------|----------------|------------|-------------|----------|
| <b>Location</b>     | NABORS Class 1 Landfill             |           |           | <b>Permit</b>  | 0249-S1-R2 | <b>AFIN</b> | 03-00051 |
| <b>Photographer</b> | Darrell Norton, Inspector           |           | <i>DN</i> | <b>Witness</b> | n/a        |             |          |
| <b>Photo #</b>      | 1                                   | <b>Of</b> | 6         | <b>Date</b>    | 11/25/2019 | <b>Time</b> | 1144     |
| <b>Description</b>  | Observed VLCS -1 with active alarm. |           |           |                |            |             |          |



|                     |   |           |           |                |            |             |          |
|---------------------|---|-----------|-----------|----------------|------------|-------------|----------|
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| <b>Photographer</b> | Darrell Norton, Inspector                 |           | <i>DN</i> | <b>Witness</b> | n/a        |             |          |
| <b>Photo #</b>      | 2   | <b>Of</b> | 6         | <b>Date</b>    | 11/25/2019 | <b>Time</b> | 1202     |
| <b>Description</b>  | Tank farm and secondary containment unit. |           |           |                |            |             |          |



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|                     |   |           |    |                |            |             |          |
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| <b>Location</b>     | NABORS Class 1 Landfill                       |           |    | <b>Permit</b>  | 0249-S1-R2 | <b>AFIN</b> | 03-00051 |
| <b>Photographer</b> | Darrell Norton, Inspector                     |           | DN | <b>Witness</b> | n/a        |             |          |
| <b>Photo #</b>      | 3   | <b>Of</b> | 6  | <b>Date</b>    | 11/25/2019 | <b>Time</b> | 1204     |
| <b>Description</b>  | Observed leak at secondary containment valve. |           |    |                |            |             |          |



|                     |   |           |    |                |            |             |          |
|---------------------|---|-----------|----|----------------|------------|-------------|----------|
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| <b>Photographer</b> | Darrell Norton, Inspector   |           | DN | <b>Witness</b> | n/a        |             |          |
| <b>Photo #</b>      | 4   | <b>Of</b> | 6  | <b>Date</b>    | 11/25/2019 | <b>Time</b> | 1210     |
| <b>Description</b>  | Area of the cover system, just west of LCS-4, on the south slope of Area 1-2. |           |    |                |            |             |          |



## Division of Environmental Quality Official Photograph Sheet

|                     |                           |           |           |                |            |             |          |
|---------------------|---------------------------|-----------|-----------|----------------|------------|-------------|----------|
| <b>Location</b>     | NABORS Class 1 Landfill   |           |           | <b>Permit</b>  | 0249-S1-R2 | <b>AFIN</b> | 03-00051 |
| <b>Photographer</b> | Darrell Norton, Inspector |           | <i>DN</i> | <b>Witness</b> | n/a        |             |          |
| <b>Photo #</b>      | 5                         | <b>Of</b> | 6         | <b>Date</b>    | 11/25/2019 | <b>Time</b> | 1211     |
| <b>Description</b>  | LCS-3 control panel.      |           |           |                |            |             |          |



|                     |  |           |           |                |            |             |          |
|---------------------|--|-----------|-----------|----------------|------------|-------------|----------|
| <b>Location</b>     | NABORS Class 1 Landfill                |           |           | <b>Permit</b>  | 0249-S1-R2 | <b>AFIN</b> | 03-00051 |
| <b>Photographer</b> | Darrell Norton, Inspector              |           | <i>DN</i> | <b>Witness</b> | n/a        |             |          |
| <b>Photo #</b>      | 6                                      | <b>Of</b> | 6         | <b>Date</b>    | 11/25/2019 | <b>Time</b> | 1247     |
| <b>Description</b>  | Road and cover system, south of LCS-6. |           |           |                |            |             |          |

