

August 24, 2020

Mr. Fred Megginson **Elemental Environmental Solutions** Gum Springs Hwy 67 South 500 E. Reynolds Road Arkadelphia, AR 71923-8817

RE: Quarterly Inspection conducted on August 4, 2020

**AFIN 10-00004** 

Permit Number 0262-S

Dear Mr. Megginson:

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 abovereferenced 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 (870) 777-7585 or greenwood@adeq.state.ar.us.

Sincerely,

Matt Greenwood Solid Waste Inspector Office of Land Resources

Mother of

Enclosure

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



# Division of Environmental Quality Office of Land Resources Solid Waste Management Class 3 Landfill Inspection



| Site Name                | Elemental Environmental Solutions         | County            | Clark                             | AFIN      | 10-00004            |  |
|--------------------------|---|-------------------|-----------------------------------|-----------|---------------------|--|
| <b>Facility Address</b>  | 2 miles east of I-30 on Hwy. 26 East.     | Phone Number      | 870-245-2700 <b>Permit Number</b> |           | 0262-S              |  |
| <b>Permittee Address</b> | 500 E. Reynolds Rd. Arkadelphia, AR 71923 | E-Mail Address    | Kent.thomas@alcoa.com             |           | <b>PDS</b> # 113095 |  |
| Date                     | 08/04/20                                  | <b>Entry Time</b> | 0920                              | Exit Time | 1020                |  |

## **Regulation 22 – Operational Standards**

## **Category 1**

| Regulation     | Item Description   | Comments |  |  |  |
|----------------|--|----------|--|--|--|
| 510(l)         | Adequate employee facilities                                   |          |  |  |  |
| 520(a)(b)      | Record keeping meets requirements specified by regulations     |          |  |  |  |
| 516            | Access requirements  |          |  |  |  |
| 510(j)         | Adequate provisions for backup equipment                       |          |  |  |  |
| 520(c)         | Waste receipt records, ticket system maintained                |          |  |  |  |
| 510(k)         | Telephone system & written emergency response plan on site     |          |  |  |  |
| 522(a)         | Annual compliance inspection by register professional engineer |          |  |  |  |
| 521            | Facility implements operating plan and narrative               |          |  |  |  |
| 520(a)(4)      | Leachate disposal/recirculation records                        |          |  |  |  |
| 701, 520(a)(2) | Special waste disposal and procedures records                  |          |  |  |  |

#### **Category 2**

| Regulation | Item Description   | Comments |
|------------|--|----------|
| 510(a)     | Operations in accordance with permit documents                     |          |
| 516(c)     | Adequate all weather operational roads                             |          |
| 510(c)     | Smallest practical area, unloading supervised, single working face |          |
| 510(e)     | Salvage operations meet approved conditions                        |          |
| 510(f)(l)  | Scavenging of waste prohibited                                     |          |
| 510(o)     | Proper wet weather repairs   |          |
| 510(b)     | Operations by licensed on-site personnel at all times              |          |
| 510(d)     | Waste spread and compacted as unloaded                             |          |
| 510(g)     | Litter control provisions maintained                               |          |
| 513(a)     | Disease vectors controlled   |          |
|            |  |          |

|                      |  | Categ          | cory 2 (continued)                        |                |            |                    |            |             |       |
|----------------------|--|----------------|---|----------------|------------|--------------------|------------|-------------|-------|
| Regulation           | Item Description   |                |   |                | Cor        | nments             |            |             |       |
| 518                  | Surface water controls   |                |   |                |            |                    |            |             |       |
| 510(h)(l)            | Contouring prevents surface water flowing into or  | through waste  |   |                |            |                    |            |             |       |
| 517(a)(b)            | Run-on/off control system present and adequate   |                |   |                |            |                    |            |             |       |
| 510(h)(2)            | Surface water control prevents off-site sediment ad  | ccumulation    |   |                |            |                    |            |             |       |
| 510(h)(i)            | Adequate maintenance of intermediate/final cover   | vegetation     |   |                |            |                    |            |             |       |
| 514                  | Gas monitoring program   |                |   |                |            |                    |            |             |       |
| 510(n)               | Leachate leaks or evidence of leachate seepage   |                |   |                |            |                    |            |             |       |
| 526                  | Survey controls  |                |   |                |            |                    |            |             |       |
| 529                  | Leachate collection system   |                |   |                |            |                    |            |             |       |
| 519                  | Liquid restrictions  |                |   |                |            |                    |            |             |       |
|                      |  | Cat            | egory 3                                   |                |            |                    |            |             |       |
| Regulation           | Item Description   |                | -83-                                      |                | Cor        | nments             |            |             |       |
| 511                  | Implementation of hazardous/unauthorized waste exclusion plan                                    |                |   |                |            |                    |            |             |       |
| 512(a)(c)            | Satisfactory daily/alternative cover   | exclusion plan |   |                |            |                    |            |             |       |
| 512(b)               | Satisfactory intermediate cover  |                |   |                |            |                    |            |             |       |
| 515(b), 510(f)(4)    | Open burning prohibited  |                |   |                |            |                    |            |             |       |
| 518                  | Cause discharge/leachate discharge leaving landfil   | 1              |   |                |            |                    |            |             |       |
| 510(f)(3), 518(a)(4) | Depositing waste in standing water prohibited  | •              |   |                |            |                    |            |             |       |
| 510(n)               | Erosion or other cover defects resulting in exposed  | refuse         |   |                |            |                    |            |             |       |
| 309(c)               | Overfill/off lined area  | Teruse         |   |                |            |                    |            |             |       |
| 309(0)               |  |                | 22 D I                                    |                |            |                    |            |             |       |
|                      |  |                | 22 - Records                              |                |            |                    |            |             |       |
|                      | ate of last groundwater monitoring report  | June 2020      |   | Site Condition |            | Dry                |            |             |       |
|                      | ate of last engineering report   | June 2020      | ner construction Yes/No                   | Weather Con    |            | Sunny              |            | on Yes/No   | NT/A  |
|                      | iner construction in progress Yes/No No<br>ate of last random inspection for unauthorized waste  |                | ner construction Yes/No Total # for month | N/A Thi        | ira part ( | CQA on-site during | constructi | 011 165/140 | N/A   |
|                      | ate of last random inspection for unauthorized waste<br>ate of last quarterly methane monitoring | N/A            | Detection level                           | N/A            | 514        | Explosive gas reco | ords curre | nt? Yes/No  | N/A   |
|                      | ate of last special waste received   | N/A            | Disposal location                         | N/A            | 314        | Dapiosive gas rece | orus curic | 110.        | 11/21 |
|                      | revious quarter waste received   | N/A            | Yrds <sup>3</sup>                         |                |            |                    |            |             |       |
|                      | urface water DMR records current? Yes/No Yes   |                | <u> </u>                                  |                |            |                    |            |             |       |
| Operator Name & Nu   |  |                | Signature of Inspector                    | r              | Metil      | Theemos            |            |             |       |
| Exit Interview Condu | icted with Kent Thomas   | Method         | On-site                                   | <b>Date</b> 0  | 08/04/20   |                    | Time       | 1020        |       |