

ARKANSAS

ENERGY & ENVIRONMENT

ENVIRONMENTAL QUALITY

September 3, 2020

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

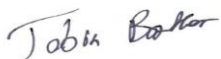
RE: Quarterly Inspection conducted on August 20, 2020
AFIN 18-00094
Permit Number 0245-S1-R2

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. 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) 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

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



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|--------------------------|--------------------------------------|-----------------------|--|----------------------|---------------------|
| Site Name | Crittenden County Class 1 | 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 | judgewheeless@crittco.com | | PDS # 113222 |
| Date | 8/20/2020 | Entry Time | 0920 | Exit Time | 1055 |


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 | | | | | | | | | | | | | |
| 411(o) | Leachate leaks or evidence of leachate seepage | | | | | | | | | | | | | |
| 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 | | | 7/6/2020 | | Site Conditions | | Dry | | | | | | |
| 423(b) | Date of last engineering report | | | 2/7/2020 | | 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 | | | 8/19/2020 | | Total # for month | | 23 | | | | | | |
| 415, 421(e) | Date of last quarterly methane monitoring | | | 6/25/2020 | | Detection level | | 0 | 415(a) | Explosive gas records current? | | Yes/No | Yes | |
| 421(g),412(a)(2),701 | Date of last special waste received | | | 8/14/2020 | | Disposal location | | Cell 4 | | | | | | |
| 421(d) | Previous quarter waste received | | | 21,296.74 | | 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 | 8/20/2020 | | Time | 1045 | | | |

Division of Environmental Quality Official Photograph Sheet

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|---------------------|--|-----------|---|--|----------------|------------|-------------|----------|
| Location | Crittenden County Class 1 Landfill | | | | Permit | 0245-S1-R2 | AFIN | 18-00094 |
| Photographer | Tobin Baker, Inspector | | | | Witness | N/A | | |
| Photo # | 1 | Of | 1 | | Date | 8/20/2020 | Time | 0958 |
| Description | Crittenden County Class 1 Landfill | | | | | | | |
| |  | | | | | | | |