



ARKANSAS

ENERGY & ENVIRONMENT

2/25/2021

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

RE: Inspection conducted on February 24, 2021
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 (501) 837-2097 or bakert@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink that reads 'Tobin Baker'.

Tobin Baker
Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

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



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

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	judgewheelless@crittco.com	PDS #	115035
Date	2/24/2021	Entry Time	0920	Exit Time	1100

Regulation 22 – Operational Standards

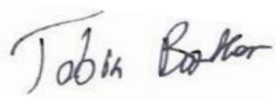
Category 1

	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	
X	429	Leachate collection system	Leachate collection system in Cell 1A observed at 96.6 inches and high level alarm light was on. (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	
X	419	Cause discharge/leachate discharge leaving landfill	Leachate observed discharging out of the south slope of Cell 4 into the storm water ditch. (Refer to Photos #1 & #2.)
	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	12/8/2020	Site Conditions Wet
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	2/10/2021	Total # for month 9
415, 421(e)	Date of last quarterly methane monitoring	12/15/2020	Detection level 0 415(a) Explosive gas records current? Yes/No Yes
421(g),412(a)(2),701	Date of last special waste received	12/17/2020	Disposal location Cell 4
421(d)	Previous quarter waste received	20,134.99	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 2/24/2021 Time 1050

Division of Environmental Quality Official Photograph Sheet

Location	Crittenden County Class 1 Landfill			Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, Inspector			Witness	N/A		
Photo #	1	Of	3	Date	2/24/2021	Time	1010
Description	Leachate observed discharging from the south slope of Cell 4.						



Location	Crittenden County Class 1 Landfill			Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, Inspector			Witness	N/A		
Photo #	2	Of	3	Date	2/24/2021	Time	1016
Description	Leachate observed discharging from south slope of Cell 4 into storm water ditch.						



Division of Environmental Quality **Official Photograph Sheet**

Location	Crittenden County Class 1 Landfill			Permit	0245-S1-R2	AFIN	18-00094
Photographer	Tobin Baker, Inspector			Witness	N/A		
Photo #	3	Of	3	Date	2/24/2021	Time	1023
Description	Leachate collection system in Cell 1A observed at 96.6 inches and high level alarm light was on.						

