



# ARKANSAS

## ENERGY & ENVIRONMENT

10/27/2021

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

**RE: Inspection conducted on October 5, 2021**  
**AFIN 03-00051**  
**Permit Number 0249-S1-R2**

Dear Mr. 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. The inspection identified conditions at your facility which the DEQ alleges constitutes violations. A copy of the inspection report is attached.

If you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 837-6909 or [nortond@adeq.state.ar.us](mailto:nortond@adeq.state.ar.us).

Sincerely,

A handwritten signature in cursive script that reads 'Darrell Norton'.

Darrell Norton  
Solid Waste Inspector  
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Scott McWilliams, Senior Compliance Manager, Regulated Waste Operations  
Diana Kilburn, Groundwater Branch Manager, Office of Land Resources



**ARKANSAS**  
ENERGY & ENVIRONMENT

**Office of Land Resources  
Regulated Waste Operations  
Class 1 Landfill Inspection Form**

<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 #</b>	870-425-3213	<b>Permit #</b>	0249-S1-R2
<b>Permittee Address</b>	P.O. Box 1715, Mountain Home, AR 72602	<b>Email Address</b>	<a href="mailto:kilburn@adeq.state.ar.us">kilburn@adeq.state.ar.us</a> <a href="mailto:judge@baxtercounty.org">judge@baxtercounty.org</a>	<b>PDS #</b>	117959
<b>Date</b>	10/5/2021	<b>Entry Time</b>	1045	<b>Exit Time</b>	1250

**Operational Standards**

**Category 1**

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
417	Access Requirements	
411(j)	Adequate Provision for Backup Equipment	
423(b)	Annual Compliance Inspection by Registered Engineer	

**Category 2**

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
411(a)	Operations in Accordance with Permit Documents	
411(c)	Smallest Practical Area, Unloading Supervised, Single Working Face	
411(b)	Operations by Licensed On-site Personnel at All Times	
411(g)	Litter Control Provisions Maintained	
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)	Adequate Maintenance of Intermediate/Final Cover Vegetation	
415	Gas Monitoring Program	
411(o)	Leachate Leaks or Evidence of Leachate Seepage	
X	429 Leachate Collection System	LCS-1 observed reading auto-test in progress. (Refer to Photo #2.) LCS-6 lacked a read-out.
	417(c) Access and Operational Roads	Road erosion present between LCS-4 and LCS-5. Vegetative control needed along roads and around LCS panels.

**Category 3**

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
413(a)(b)(c)	Satisfactory Daily/Alternate/Intermediate Cover	
419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
411(f)(3)	Depositing Waste in Standing Water Prohibited	
X	411(o) Erosion or Other Cover Defects	Turf roll and damage to the final cover system observed in multiple areas. (Refer to Photos #4 - #6.)
	309(c) Overfill/Off Lined Area	

**Records**

<b>Date of Last Annual Report</b>	9/16/2013	<b>Date of Last Quarterly Methane Monitoring</b>	4/2021
<b>Date of Last Groundwater Monitoring Report</b>	October 2021 Sampling event occurring at	<b>Previous Quarter Waste Received</b>	n/a

	time of inspection.				
<b>Operator Name &amp; Number</b>	n/a	<b>Signature of Inspector</b>		<i>Darrell Norton</i>	
<b>Exit Interview Conducted with</b>	n/a	<b>Method</b>	n/a	<b>Date</b>	10/5/2021
				<b>Time</b>	n/a

## Division of Environmental Quality Official Photograph Sheet



<b>Location</b>	NABORS Class 1			<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>	10/5/2021	<b>Time</b>	1049
<b>Description</b>	Secondary containment at tank farm.						



<b>Location</b>	NABORS Class 1			<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>	2	<b>Of</b>	6	<b>Date</b>	10/5/2021	<b>Time</b>	1052
<b>Description</b>	LCS-1 with auto test in progress.						



## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	NABORS Class 1			<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>	3	<b>Of</b>	6	<b>Date</b>	10/5/2021	<b>Time</b>	1053
<b>Description</b>	Vents observed down on the North slope of Area 1-2.						
							
<b>Location</b>	NABORS Class 1			<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>	4	<b>Of</b>	6	<b>Date</b>	10/5/2021	<b>Time</b>	1054
<b>Description</b>	Damage to the turf cover system observed west of LCS-1.						
							

## Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	NABORS Class 1			<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>	10/5/2021	<b>Time</b>	1111
<b>Description</b>	Turf roll observed.						



<b>Location</b>	NABORS Class 1			<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>	10/5/2021	<b>Time</b>	1201
<b>Description</b>	Turf roll observed near LCS-7.						

