



ARKANSAS

ENERGY & ENVIRONMENT

12/16/2022

Mr. Steve Kershaw
OMSWD
P.O. Box 1669
Harrison, AR 72602

RE: Inspection conducted on November 28, 2022
AFIN 03-00051
Permit Number 0249-S1-R2

Dear Mr. Kershaw:

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 are 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 darrell.norton@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



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

| | | | | | |
|--------------------------|---|----------------------|--|------------------|------------|
| Site Name | NABORS Landfill | County | Baxter | AFIN | 03-00051 |
| Facility Address | Hwy 5 N to CR 16 to site entrance- Three Brothers | Phone # | 870-688-3822 | Permit # | 0249-S1-R2 |
| Permittee Address | P.O. Box 1669 Harrison, AR 72602 | Email Address | Steve.kershaw.engr@gmail.com judge@baxtercounty.org | PDS # | 123868 |
| Date | 11/28/2022 | Entry Time | 1145 | Exit Time | 1250 |

Operational Standards

Category 1

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

Category 2

| Regulation | Item Description | Comments |
|------------|--|--|
| 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 | |
| X | 411(i) Adequate Maintenance of Intermediate/Final Cover Vegetation | Turf roll and damage observed in multiple areas. Woody vegetation observed in final cover system near LCS 6 (Refer to Photos #4-#6.) |
| X | 415 Gas Monitoring Program | Last gas report was received in April of 2021. |
| | 411(o) Leachate Leaks or Evidence of Leachate Seepage | |
| X | 429 Leachate Collection System | LCS 1 observed with auto-test readout. LCS 8 observed with an active amber strobe and pump fault read-out. |
| X | 417(c) Access and Operational Roads | Road erosion present between LCS-4 and LCS-5. Vegetative control needed along roads and around LCS 3. (Refer to Photo #5.) |

Category 3

| Regulation | Item Description | Comments |
|--------------|--|----------|
| 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 | |
| 411(o) | Erosion or Other Cover Defects Resulting in Exposed Refuse | |
| 309(c) | Overfill/Off Lined Area | |

| Records | | | | | | | |
|---|-----------|--|-------------------------------|-----|-------------|----------------------|-----------------|
| Date of Last Annual Report | 9/16/2013 | Date of Last Quarterly Methane Monitoring | 4/2021 | | | | |
| Date of Last Groundwater Monitoring Report | 4/2022 | Previous Quarter Waste Received | N/A | | | | |
| Operator Name & Number | N/A | | Signature of Inspector | | | <i>Daniel Norton</i> | |
| Exit Interview Conducted with | N/A | | Method | N/A | Date | N/A | Time N/A |

Division of Environmental Quality Official Photograph Sheet

| | | | | | | | |
|---------------------|--|-----------|-----------|----------------|------------|-------------|----------|
| Location | NABORS Class 1 | | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| Photographer | Darrell Norton, Inspector | | <i>DN</i> | Witness | N/A | | |
| Photo # | 1 | Of | 6 | Date | 11/28/2022 | Time | 1148 |
| Description | Secondary containment at tank farm observed. | | | | | | |



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|---------------------|---------------------------------------|-----------|-----------|----------------|------------|-------------|----------|
| Location | NABORS Class 1 | | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| Photographer | Darrell Norton, Inspector | | <i>DN</i> | Witness | N/A | | |
| Photo # | 2 | Of | 6 | Date | 11/28/2022 | Time | 1148 |
| Description | Leachate level observed at tank farm. | | | | | | |



Division of Environmental Quality Official Photograph Sheet

| | | | | | | | |
|--|--------------------------------------|-----------|-----------|----------------|------------|-------------|----------|
| Location | NABORS Class 1 | | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| Photographer | Darrell Norton, Inspector | | <i>DN</i> | Witness | N/A | | |
| Photo # | 3 | Of | 6 | Date | 11/28/2022 | Time | 1153 |
| Description | Broken gas vent observed near LCS 1. | | | | | | |
|  | | | | | | | |
| Location | NABORS Class 1 | | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| Photographer | Darrell Norton, Inspector | | <i>DN</i> | Witness | N/A | | |
| Photo # | 4 | Of | 6 | Date | 11/28/2022 | Time | 1153 |
| Description | Turf roll observed near LCS 1. | | | | | | |
|  | | | | | | | |

Division of Environmental Quality Official Photograph Sheet

| | | | | | | | |
|---------------------|---------------------------------------|-----------|-----------|----------------|------------|-------------|----------|
| Location | NABORS Class 1 | | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| Photographer | Darrell Norton, Inspector | | <i>DN</i> | Witness | N/A | | |
| Photo # | 5 | Of | 6 | Date | 11/28/2022 | Time | 1204 |
| Description | Woody vegetation observed near LCS 3. | | | | | | |



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|---------------------|---|-----------|-----------|----------------|------------|-------------|----------|
| Location | NABORS Class 1 | | | Permit | 0249-S1-R2 | AFIN | 03-00051 |
| Photographer | Darrell Norton, Inspector | | <i>DN</i> | Witness | N/A | | |
| Photo # | 6 | Of | 6 | Date | 11/28/2022 | Time | 1232 |
| Description | Woody vegetation and turf roll observed near LCS 6. | | | | | | |

