



DIVISION OF
ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

10/3/2023

Mr. Chuck Seaton
OMSWD
P.O. Box 1669
Harrison, AR 72602

RE: Inspection conducted on September 25, 2023
AFIN 03-00051
Permit Number 0249-S1-R2

Dear Mr. Seaton:

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 the 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

cc: Nicholas Jones P.E., Senior Operations Manager, Office of Land Resources
Diana Kilburn, Groundwater Branch Manager, Office of Land Resources

**Division of Environmental Quality
Office of Land Resources
Class 1 Landfill Inspection Form**

127666

Site Name	NABORS Class 1 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	cwsautomotiveandconsulting@gmail.com	PDS #	127666
Date	9/25/2023	Entry Time	1032	Exit Time	1210

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 was observed in multiple areas. Woody vegetation also observed in the final cover system.
	415 Gas Monitoring Program	
	411(o) Leachate Leaks or Evidence of Leachate Seepage	
X	429 Leachate Collection System	Multiple LCS panels were observed with the pump control in the off position. Multiple LCS panels were observed lacking a head level read-out. The leachate system does not currently provide information as to the head level present on the bottom liner.
X	417(c) Access and Operational Roads	Road erosion was present between LCS-4 and LCS-5. Vegetative control needed along roads and around the LCS panels. (Refer to Photos #1, #3 and #4.)

Category 3

Regulation	Item Description	Comments
413(a)(b)(c)	Satisfactory Daily/Alternate/Intermediate Cover	
X	419(a)(5) Cause Discharge/Leachate Leaving Landfill	VLCS-1 sump was observed overflowing. (Refer to Photos #1 and #2.)
	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	5/2023
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Date of Last Groundwater Monitoring Report	10/2022	Previous Quarter Waste Received			n/a	127666
Operator Name & Number	n/a	Signature of Inspector			<i>Darrell 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	4	Date	9/25/2023	Time	1037
Description	Vegetative growth was observed around VLCS-1. VLCS-1 appears to be failing with leachate overflow visible.						



Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, Inspector		<i>DN</i>	Witness	n/a		
Photo #	2	Of	4	Date	9/25/2023	Time	1038
Description	Evidence of leachate overflow from VLCS-1 observed.						



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	4	Date	9/25/2023	Time	1104
Description	Vegetative growth observed around LCS- 3 panel.						



Location	NABORS Class 1			Permit	0249-S1-R2	AFIN	03-00051
Photographer	Darrell Norton, Inspector		<i>DN</i>	Witness	n/a		
Photo #	4	Of	4	Date	9/25/2023	Time	1111
Description	A view of the overgrown access road and turf roll near LCS-4 panel.						

