



DIVISION OF  
ENVIRONMENTAL QUALITY

132512

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

11/14/2024

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

**RE: Inspection conducted on October 24, 2024**  
**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 are violations. A copy of the inspection report is attached.

Crittenden County 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 [Tobin.Baker@arkansas.gov](mailto:Tobin.Baker@arkansas.gov).

Sincerely,

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

Tobin Baker  
Solid Waste Inspector

cc: Ryan Hayden, Senior Compliance Manager, Office of Land Resources

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

|                          |                                      |                      |  |                  |            |
|--------------------------|--------------------------------------|----------------------|--|------------------|------------|
| <b>Site Name</b>         | Crittenden County Class 1            | <b>County</b>        | Crittenden   | <b>AFIN</b>      | 18-00094   |
| <b>Facility Address</b>  | 1299 Khun Rd. West Memphis, AR 72301 | <b>Phone #</b>       | LF: 870-732-4290 Off: 870-732-6580   | <b>Permit #</b>  | 0245-S1-R2 |
| <b>Permittee Address</b> | 100 Court Street Marion, AR 72364    | <b>Email Address</b> | <a href="mailto:judgetwheeless@crittco.com">judgetwheeless@crittco.com</a> | <b>PDS #</b>     | 132512     |
| <b>Date</b>              | 10/24/2024                           | <b>Entry Time</b>    | 0920   | <b>Exit Time</b> | 1030       |

**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 |  |
| X | 411(b)            | Operations by Licensed On-site Personnel at All Times              | The licensed on-site operator did not meet the requirements of Rule Number 27. |
|   | 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   |  |
| X | 411(o)            | Leachate Leaks or Evidence of Leachate Seepage                     | Leachate leaks observed on the east side of the landfill. (Refer to Photo #1)  |
|   | 429               | Leachate Collection System   |  |
|   |                   |  |  |

**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              |  |
|   | 411(o)            | Erosion or Other Cover Defects Resulting in Exposed Refuse |  |
| X | 309(c)            | Overfill/Off Lined Area                                    | Overfill conditions existed near the top of Cell 2 and Cell 3 as specified in Document #85464. |
|   |                   |  |  |

**Records**

|   |           |  |           |
|---|-----------|--|-----------|
| <b>Date of Last Annual Report</b>                 | 3/31/2024 | <b>Date of Last Quarterly Methane Monitoring</b> | 9/17/2024 |
| <b>Date of Last Groundwater Monitoring Report</b> | 9/19/2024 | <b>Previous Quarter Waste Received</b>           | 24,602.33 |

|                               |                       |                        |         |      |             |      |      |
|-------------------------------|-----------------------|------------------------|---------|------|-------------|------|------|
|                               |                       |                        |         |      |             |      |      |
| Operator Name & Number        | Terrence Carr- 004867 | Signature of Inspector |         |      | Tobin Baker |      |      |
| Exit Interview Conducted with | Terrence Carr         | Method                 | On-site | Date | 10/24/2024  | Time | 1025 |

|                     |   |           |   |  |             |                |             |             |          |
|---------------------|---|-----------|---|--|-------------|----------------|-------------|-------------|----------|
| <b>Location</b>     | Crittenden County Class 1 Landfill                        |           |   |  |             | <b>Permit</b>  | 0245-S1-R2  | <b>AFIN</b> | 18-00094 |
| <b>Photographer</b> | Tobin Baker, Inspector                                    |           |   |  |             | <b>Witness</b> | N/A         |             |          |
| <b>Photo #</b>      | 1   | <b>Of</b> | 1 |  | <b>Date</b> | 10/24/2024     | <b>Time</b> | 0926        |          |
| <b>Description</b>  | Leachate leaks observed on the east side of the landfill. |           |   |  |             |                |             |             |          |

