## ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY



TO:

File

THROUGH: Scott McWilliams, Tire Accountability Program Manager

FROM:

Tammie J. Hynum, Tire Accountability Program Sr. Manager

DATE:

January 28, 2019

SUBJECT:

DAMCO Tire Processing Facility Inspection for 1<sup>st</sup> Quarter Calendar Year 2019

The Tire Accountability Program (TAP) has a statutory mandate under the Solid Waste Management Act to conduct quarterly inspections at all permitting Solid Waste facilities. The DAMCO site, located in Mountain Home, Baxter County, Arkansas is a waste tire processing facility that once held permit 0022-SWTP. The DAMCO site is currently being closed by the Arkansas Department of Environmental Quality (ADEQ) under the Post-Closure Trust Fund.

The Office of Land Resources Remediation group conducts bi-weekly site visits to inspect the DAMCO site and ensure there is no storm water run-off or noncompliant issues that could result in a potential imminent substantial endangerment. The latest site visit was conducted on January 17, 2019. This site visit represents the 1<sup>st</sup> quarter mandated inspection.

Phase 1 remediation, conducted by an ADEQ Professional Services contractor, was completed on February 27, 2018. Phase II remediation activities will commence once the site surveys are completed. The Building Authority agreed to allow ADEQ to award the contract for the Phase II activities. A pre-construction meeting is scheduled for January 29, 2019.

No noncompliant issues were noted during this last site inspection.



## Arkansas Department of Environmental Quality

## Office of Land Resources Tire Processing Facility (TPF) Inspection Form

| Site Name          |  |   | DAMCO                       |                                     | County         | Baxter   | AFIN >       | 03-00480   |
|--------------------|--|---|-----------------------------|-------------------------------------|----------------|----------|--------------|------------|
| Facility Address   |  |   |                             | Mountain Home, AR 72653             | Phone Number   | Touries. | Nermi Number |            |
| Permittee Address  |  | SS  | Same as above               | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | E-Mail Address |          |              | 0022 01111 |
| Date               |  |   |                             | /17/19                              | Entry Time     | N/A      | Exit Time    | N/A        |
|                    | ( ) i  | 1500  |                             | Regulation 36 Operatio              |                |          |              |            |
| Regulation         |  |   | Description                 |                                     |                | 0,670    | Comments     |            |
|                    |  | rmit Require  |                             |                                     |                |          |              |            |
|                    | -  |   | F submitted a form TAP-4 to |                                     | -              |          |              |            |
|                    |  | <ul><li>☐ Yes ☐ No</li><li>b. Does the TPF process &gt;500 tires during any 30 calendar day period?</li></ul> |                             |                                     |                |          |              |            |
|                    | b.   |   |                             |                                     |                |          |              |            |
|                    | ☐ Yes ☐ No   |   |                             |                                     | 1)"            |          |              |            |
| 36.1602            | Sto  | orage   |                             |                                     |                |          |              |            |
|                    | a.   | What is the   | daily capacity of the proce | essing equipment used?              | >              |          |              |            |
|                    |  |   |                             | 100                                 |                |          |              |            |
|                    | b. What is the daily capacity of the processing equipment multiplied by  |   |                             |                                     |                |          |              |            |
|                    | 30?  |   |                             |                                     |                |          |              |            |
|                    |  | Are there t   | ires stored indoors, outdoo |                                     |                |          |              |            |
|                    | "  | Are there tires stored indoors, outdoors, or in trailers in a quantity greater than the number for "b"?       |                             |                                     |                |          |              |            |
|                    |  | Yes   | □ No                        |                                     |                |          |              |            |
|                    | d. If yes to "c", has ADEQ issued a written approval due to a special circumstance?  Yes No  |   |                             |                                     |                |          |              |            |
|                    |  |   |                             |                                     |                |          |              |            |
| 1                  |  |   |                             |                                     |                |          |              |            |
|                    |  | Date of App   |                             |                                     | ]              |          |              |            |
|                    | $oxed{oxed}$   | Expiration I  | Date of Approval:           |                                     |                |          |              |            |
|                    | e.   | Is the TPF c  | constructed, maintained, or | operated within 200' of any         |                |          |              |            |
|                    |  | wetland, transitional wetland, or isolated wetland?   |                             |                                     |                |          |              |            |
|                    |  | ☐ Yes ☐ No  |                             |                                     |                |          |              |            |
|                    | f. If yes to "e", are there adequate permanent control methods for residuals in place and is the TPF in compliance with ADEQ water |   |                             |                                     |                |          |              |            |
|                    |  |   |                             |                                     |                |          |              |            |
| quality standards? |  |   |                             |                                     |                |          |              |            |

| Regulation      | Description   | Comments   |  |  |
|-----------------|---|------------|--|--|
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | g. Is the TPF tire storage area designed and maintained to divert storm   |            |  |  |
|                 | water or flood waters around and away from the tire storage areas?        |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | h. If an open-top container or trailer is used as a tire storage area, is |            |  |  |
|                 | the container or trailer covered with a tarp or placed under cover?       |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | i. If the tire storage area is open, uncovered, or not encosed on all     |            |  |  |
|                 | sides, does the TPF have an ADEQ issued stormwater permit?                | 00         |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | j. Does the TPF tire storage area have clear signage indicating the type  |            |  |  |
|                 | of used tires?  |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | ☐ Waste tires   |            |  |  |
|                 | Used tires culled for resale  |            |  |  |
|                 | Recyclable tires  |            |  |  |
|                 | k. Does the TPF tire storage area exceed 50' W X 100' L X 15' H?          |            |  |  |
|                 | ☐ Yes ☐ No  | <b>)</b> . |  |  |
|                 | I. Does the TPF tire storage area have a fire lane 50' wide around the    |            |  |  |
|                 | perimeter of each tire storage area and unobstructed access to the        |            |  |  |
|                 | fire lane(s) at all times?  |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | m. Does the TPF have a mosquito and rodent control plan?                  |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | Is it effective at time of inspection?                                    |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | n. Does the TPF receive tires from persons other than the operator of     |            |  |  |
|                 | the tire storage site?  |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | If yes, is there a sign posed that is legible from 20' that states the    |            |  |  |
| No. of the last | operating hours, cost of disposal, and storage site rates?                |            |  |  |
|                 |   |            |  |  |
|                 | o. Are operations conducted at the TPF tire storage area equal to or      |            |  |  |
|                 | less than 25' of the tire storage area?                                   |            |  |  |
|                 | ☐ Yes ☐ No  |            |  |  |
|                 | p. Are the roads to the TPF tire storage area all weather access and      |            |  |  |
|                 | passable?   |            |  |  |

| Regulation | Description   | Comments    |  |  |
|------------|---|-------------|--|--|
|            | ☐ Yes ☐ No  |             |  |  |
|            | q. Is access to the TPF tire storage area controlled by fences, gates,  |             |  |  |
|            | natural barriers or other means approved by ADEQ?                       |             |  |  |
|            | │   |             |  |  |
|            | r. Does the TPF tire storage area have surface water run-on/run-off     | •           |  |  |
|            | controls such as berms and ditches?                                     |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
|            | s. Does the TPF have an annual fire safety survey conducted by a local  |             |  |  |
|            | fire protection authority on file?                                      |             |  |  |
|            | │  │  │ Yes  │ No   |             |  |  |
|            | Date of last survey   |             |  |  |
|            | Fire Authority conducting the survey                                    |             |  |  |
|            | t. Is the communication equipment maintained?                           |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
|            | u. Does the TPF have a written emergency preparedness manual?           |             |  |  |
|            | ☐ Yes ☐ No Date ,   |             |  |  |
|            | v. Does the TPF have fire control equipment on-site? (list type and     |             |  |  |
|            | location in the comments section)                                       | <i>&gt;</i> |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
| 36.1603    | Duration  |             |  |  |
|            | Are there more than 75% combined total of both used tires and           |             |  |  |
|            | processed tires stored or contained on-site that have been present      |             |  |  |
|            | during the current year?  |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
| 36.1604    | Recordkeeping   |             |  |  |
|            | Is the TPF retaining records of their activities for 3 years?           |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
|            | Does the TPF retain records on-site available for inspector?            |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
|            | Certifications, sample results, monitoring data, testing or analytical  |             |  |  |
|            | data?   |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
|            | Closure cost estimates and any monitoring, testing, financial assurance |             |  |  |
|            | records or analytical data?   |             |  |  |
|            | ☐ Yes ☐ No  |             |  |  |
|            | Any other records required by APC&EC Reg. 36?                           |             |  |  |

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| Regulation | Description   | Comments   |  |  |
|------------|---|------------|--|--|
|            | ☐ Yes ☐ No  |            |  |  |
| 36.1605    | Inspections   |            |  |  |
|            | a. Is the TPF conducting inspections of its facility for malfunctions and |            |  |  |
|            | determination, operator errors, and discharges?                           |            |  |  |
|            | ☐ Yes ☐ No  |            |  |  |
|            | b. Any documented release of hazardous constituents to the                | A CA       |  |  |
|            | environment?  |            |  |  |
|            | ☐ Yes ☐ No  |            |  |  |
|            | c. Any documented potential threat to human health or the                 |            |  |  |
|            | environment?  |            |  |  |
|            | ☐ Yes ☐ No  |            |  |  |
|            | d. Frequency of inspections   |            |  |  |
|            | (note: minimum of weekly required)  |            |  |  |
|            | e. Does the TPF have a written inspection schedule on file?               |            |  |  |
|            | ☐ Yes ☐ No  |            |  |  |
|            | f. Does the written inspection schedule contain plans for inspecting:     |            |  |  |
|            | All equipment   |            |  |  |
|            | Safety and emergency equipment  | <i>y</i> ' |  |  |
|            | Security devices  |            |  |  |
|            | Operating equipment   |            |  |  |
|            | Site conditions   |            |  |  |
|            | Tire storage areas  |            |  |  |
|            | Vegetative growth   |            |  |  |
|            | Berms ☐ Yes , ☐ No  |            |  |  |
|            | Buildings   |            |  |  |
|            | g. Is the date and time included for each inspection?                     |            |  |  |
|            | ☐ Yes ☐ No  |            |  |  |
|            | h. Is the name of the TPF personnel conducting the inspection noted?      |            |  |  |
|            | ☐ Yes ☐ No  |            |  |  |

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| Regulation | Description   | Comments |
|------------|---|----------|
|            | i. If observations are noted on any inspection, is the date, time and |          |
|            | nature of any repairs or remedies noted?                              |          |
|            | ☐ Yes ☐ No  |          |
| 36.1606    | Vector Control  |          |
|            | Does the TPF have an approved vector control program and is it        | *        |
|            | operationsal for all outside tire storage areas?                      | , S.     |
|            | ☐ Yes ☐ No  |          |
| 36.1607    | Emergency Preparedness  |          |
|            | a. Does the TPF have a written ADEQ approved emergency                | 00       |
|            | preparedness plan?  |          |
|            | ☐ Yes ☐ No  | • 20     |
|            | b. Does the TPF have communication equipment and is it maintained?    | A THE    |
|            | ☐ Yes ☐ No  |          |
|            | c. Does the TPF have fire control equipment on-site? (list type and   |          |
|            | location in comments section)   |          |
|            | ☐ Yes ☐ No  |          |
| 36.1608    | Operator License Requirement  |          |
|            | Does the TPF have at least one licensed SW Management facility        | <i>y</i> |
|            | operators?  |          |
|            | ☐ Yes ☐ No  |          |
|            | Name of Operator:   |          |
|            | License No.:  |          |
|            | Date license issued:  |          |
| 36.1612    | Annual Reporting  |          |
|            | Has the TPF submitted an Annual Report by June 30 (form TAP-5)?       |          |
|            | ☐ Yes ☐ No  |          |
| 36.1613    | Closure Plan  |          |
|            | a. Does the TPF have an ADEQ approved Closure Plan?                   |          |
|            | ☐ Yes ☐ No  |          |
|            | b. Does the approved closure plan include:                            |          |
|            | Written description of how the close requirements will                |          |
|            | be met?   |          |
|            | ☐ Closure schedule, including time period for completion?             |          |
|            | ☐ Plan for site rehabilitation?                                       |          |
|            | ☐ Financial Assurance?  |          |

| Regulation             |                            |                                     | Comments             |                     |                    |  |  |
|------------------------|----------------------------|-------------------------------------|----------------------|---------------------|--------------------|--|--|
|                        | Measure                    | es for submitting annual cost estin | nate                 |                     |                    |  |  |
| 1.1.                   | adjustme                   | ents? Using current inflation facto | or?                  |                     |                    |  |  |
| 36.1615                | Financial Assurance        |                                     |                      |                     |                    |  |  |
|                        | Does the TPF have a cu     | rrent financial mechanism?          |                      |                     |                    |  |  |
|                        | Yes No                     |                                     |                      | _                   |                    |  |  |
|                        | Туре                       |                                     |                      |                     |                    |  |  |
|                        | Issuance Date              | ete                                 |                      |                     |                    |  |  |
|                        | Expiration Date            |                                     |                      |                     |                    |  |  |
|                        |                            |                                     | Regulation 36 Record | ls                  |                    |  |  |
|                        |                            | ency preparedness manual            |                      |                     | <b>Y</b>           |  |  |
|                        | vaste tires/processed tire |                                     |                      | A.                  | 0                  |  |  |
|                        | vaste tires stored on site |                                     |                      | 4                   | Y                  |  |  |
|                        | aste tires shipped from    | site                                |                      |                     | Site Conditions    |  |  |
| Date of last a         | nnual report               |                                     |                      | 2                   | Weather Conditions |  |  |
|                        |                            |                                     | THE P                | <u> </u>            | I:                 |  |  |
| Operator Name & Number |                            |                                     | Sign                 | nature of Inspector |                    |  |  |
|                        | ew Conducted<br>vith       | 400                                 |                      | e                   | Time               |  |  |
| ^                      |                            | A Being                             |                      |                     |                    |  |  |

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