ARKANSAS
ENERGY & ENVIRONMENT

December 15, 2020

Catherine Cook
City Manager
P.O. Box 667
Hope, AR 71802

RE: Compliance Audit of October 7, 2020
Solid Waste Permit: 0226-S1-R2 & 0226-S4-R1
AFIN: 29-00034

Dear Ms. Cook

The Arkansas Department of Energy and Environment Division of Environmental Quality Office of Land Resources (DEQ) conducted a records review of the City of Hope Landfills (Permit No. 0226-S1-R2 & 0226-S4-R1) on October 7, 2020. This review was conducted to evaluate compliance with Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation 11 and 22, which pertains to the Solid Waste Management Landfill and Out-of-State Transporter Disposal Fee System. The Department would like to extend their appreciation to Mr. Mark Curtis for his assistance during the facility's review. At this time, the Department found your Class 1 and Class 4 Landfills in compliance with the requirements set forth in Ark. Code Ann. § 8-6-606.

I have attached a copy of my report for your files. The Department will continue to monitor your facility and looks forward to providing any assistance you may need in the future.

If you have any questions, please contact me at (501) 682-0599 or sykes@adeq.state.ar.us.

Sincerely,

John C. Sykes

John Sykes
Environmental Program Coordinator
Assessment & Remediation, Office of Land Resources (OLR)
5301 Northshore Dr. North Little Rock, AR 72118-5317

cc: Dianna Kilburn, Senior Manager, Assessment & Remediation OLR
Susan Speake, Trust Fund Manager, Assessment & Remediation OLR
David Witherow P.E., Senior Manager, Regulated Waste Operations OLR

Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) Office of Land Resources-Solid Waste

Office of Land Resources Solid Waste Facility Record Review APC&EC Regulation No. 11 and No. 22				
Facility: **City of Hope**	**Permit #: 0226-S4-R1** **0226-S1-R2**	**AFIN:29-00034**		
Site Address: **3759 Hwy 67 West Hope, AR 71801**	**Mailing Address:** **P.O. Box 667 Hope, AR 71802**			
Facility Contact: Ms. Catherine Cook (City Manager) **Mark Curtis**	**Contact #: (870) 777-6701**	**Email:** **landfill@hopearkansas.net**		
Landfill Class 1 and 4	**Record Review Date: October 7, 2020**			
APC&EC Regulation 11.204 - Disposal Fee Plan				
1. Does the facility have a DEQ approved Disposal Fee Plan and Narrative (DFPN)?	**Yes** ☒	**No** ☐	**N/A** ☐	
a. Is the DFPN current (within 5 years of original submission)?	**Yes** ☒	**No** ☐	**N/A** ☐	
b. Is the copy of the DFPN on-site and available for review?	**Yes** ☒	**No** ☐	**N/A** ☐	
c. Does the DFPN establish accurate methods of quantifying waste received?	**Yes** ☒	**No** ☐	**N/A** ☐	
d. Does the DFPN show suitable means of calculating disposal fees?	**Yes** ☒	**No** ☐	**N/A** ☐	
e. Does the DFPN include methodology for receiving and calculating materials collected or set-aside for recycling or beneficial reuse?	**Yes** ☒	**No** ☐	**N/A** ☐	
APC&EC Regulation 11.205(D) - Scales and Weight Reporting Requirements Class 1 and 3C (or if facility operates on a weight basis per APC&EC Regulation 11.206(B)(1)(c))				
1. Is the facility using a scale to weigh all the waste received at the landfill?	**Yes** ☐	**No** ☒	**N/A** ☐	
a. If no, is the facility using an alternative weighing system approved by DEQ?	**Yes** ☒	**No** ☐	**N/A** ☐	
b. Describe this alternative weighing system on an additional page.				
2. Is the facility estimating residential loads weighing less than one (1) ton? **All loads are estimated as full**	**Yes** ☐	**No** ☒		
a. If yes, explain the method of estimation and how it is calculated into quarterly totals on an additional page.				
3. Is the total weight of all waste received at gate reported?	**Yes** ☐	**No** ☐	**N/A** ☒	
4. Are waste reduction credits applied to beneficial reuse materials?	**Yes** ☐	**No** ☐	**N/A** ☒	
5. Is the scale certified?	**Yes** ☐	**No** ☐	**N/A** ☒	
a. If yes, what is the date of the most recent scale certification, and who is the certifying company? **Facility does not use a scale.**				
6. Does waste receive mechanical compaction prior to entering the facility? **Compaction is done using a bailer at the facility.**	**Yes** ☐	**No** ☒	**N/A** ☐	

7. How are the waste volumes estimated? **Estimated in Tons and Cubic Yards once a monthly average is determined following bail compaction.**			
APC&EC Regulation 11.206 - Record Keeping and Reporting			
1. Does the facility have a waste ticket system in place?	**Yes** ☒	**No** ☐	**N/A** ☐
a. Are tickets available for inspection at the facility site?	**Yes** ☒	**No** ☐	**N/A** ☐
b. Is this ticket a hand written duplicate or an electronically printed ticket?	**Hand written.**		
c. Does the general ticket system include the customer name? *11.206*	**Yes** ☒	**No** ☐	**N/A** ☐
d. Does the general ticket system include the type or kind of solid waste?	**Yes** ☒	**No** ☐	**N/A** ☐
e. Does the general ticket system include the geographic source of waste (by county at least)?	**Yes** ☒	**No** ☐	**N/A** ☐
f. Does the general ticket system include the net weight (ton) or amount (ucy or cy)?	**Yes** ☒	**No** ☐	**N/A** ☐
g. Does the general ticket system include a unique ID (if customer has multiple vehicles or containers)?	**Yes** ☒	**No** ☐	**N/A** ☐
h. Does the general ticket system include a date of disposal? *22.4219(d)*	**Yes** ☒	**No** ☐	**N/A** ☐
i. Does the general ticket system include a time of disposal? *22.4219(d)*	**Yes** ☒	**No** ☐	**N/A** ☐
j. Does the general ticket system include a general location of disposal? 22.4219(d)	**Yes** ☒	**No** ☐	**N/A** ☐
2. Where are the Solid Waste Disposal Tickets stored?	**In the landfill office.**		
3. How often are the tickets organized and totaled?	**Monthly**		
4. Are facility Solid Waste Disposal Quarterly Report Forms (SWDQRF) and disposal fees current?	**Yes** ☒	**No** ☐	**N/A** ☐
5. How are the waste totals and disposal fees reported on the SWDQRF calculated?	**Quarterly**		
APC&EC Regulation 11.206(C) - Waste Reduction			
1. Does the facility claim a waste reduction credit (WRC) for recycling/ beneficial reuse?	**Yes** ☐	**No** ☒	**N/A** ☐
2. Are materials reclaimed for recycling completely removed from the premises for marketing prior to applying the credit on the SWDQRF?	**Yes** ☐	**No** ☐	**N/A** ☒
3. Have materials set aside for beneficial reuse been approved for use by DEQ?	**Yes** ☐	**No** ☐	**N/A** ☒
4. Does the facility have records showing types, descriptions, and net weights or amounts of materials removed for marketing or beneficial reuse, and the final destination of these materials?	**Yes** ☐	**No** ☐	**N/A** ☒
5. Have these materials been included in the total waste and fee amounts as reported on the SWDQRF?	**Yes** ☐	**No** ☐	**N/A** ☒
6. Have the recovery methods and materials been approved in the DFPN?	**Yes** ☐	**No** ☐	**N/A** ☒
7. Are WRCs being applied due to Keep America/Arkansas Beautiful (KAB) Campaigns?	**Yes** ☐	**No** ☒	**N/A** ☐
a. If yes, please provide dates of KAB Cleanup and KAB contact information.	**N/A**		
APC&EC Regulation 11.206(B) - SWDQRF Information			
Quarter/Year of most recent SWDQRF: **2019 Q1-Q4 Class 1**			

Waste Received Total: **7076.54 Tons**	Fees Due: **$17,691.35**
Waste Reduction Credit (Volume): **0.00 Tons**	Waste Reduction Credit (fees): **$ 0.00**
Total Waste Deposited in LF:**7076.54 Tons**	Total Payment Due: **$ 17,691.35 (Paid)**

Total Waste Reported per SWDQRFs for year of most recent AIER: **7076.54 Tons**
Difference in waste reported on AEIR vs above total: **.56 more tons were recorded on the 2019 AEIR.**
Comments: **N/A**

APC&EC Regulations 22.423; 22.522; 22.619 - Annual Engineering Inspection Report (AEIR) Information Class 1 Landfill	
1. Year of most recent AEIR: **2019**	2. Air Space Used:**24,285 Cubic Yards**
3. Total Waste Deposited: **7,077 Tons**	4. Overfill Reported: **No**
5. Life remaining in current cell: **36 Years**	6. Life remaining in permitted landfill: **36 Years**
Comments:	

APC&EC Regulation 11.206(B) - SWDQRF Information	
Quarter/Year of most recent SWDQRF: **2019 Q1-Q4 Class 4**	
Waste Received Total: **13,827 Cubic Yards**	Fees Due: **$5,530.80**
Waste Reduction Credit (Volume):	Waste Reduction Credit (fees): **0.00**
Total Waste Deposited in LF:**13,827 Cubic Yards**	Total Payment Due: **$5530.80 (Paid)**
Total Waste Reported per SWDQRFs for year of most recent AEIR: **13,827 Cubic Yards**	
Difference in waste reported on AEIR vs above total: **1,504 more cubic yards were recorded on the QRF**	
Comments:	

APC&EC Regulations 22.423; 22.522; 22.619 - Annual Engineering Inspection Report (AEIR) Information Class 4 Landfill	
1. Year of most recent AEIR: **2019**	2. Air Space Used:**12,323 Cubic Yards**
3. Total Waste Deposited: **12,323 Cubic Yards**	4. Overfill Reported: **No**
5. Life remaining in current cell: **3 Years**	6. Life remaining in permitted landfill: **146 Years**
Comments:	

APC&EC Regulation 11.206(G) - Waste Records Requested	
Periods Requested: **2019 Q1-Q4**	
Periods Provided: **2019 Q1-Q4**	
Format of records: **2019Q1-Q4**	

Additional Comments

Disposal Fee Plan Comments:

Ms. Cook does the disposal fee plan and it is up to date.

Scales and Weight Reporting Requirements Comments:

The City of Hope landfill is the only landfill in the state that does not use a scale. This method is approved by DEQ. Commercial 33 CY and residential 20 CU. loads are estimated as full and the cubic yards of the truck determines the cubic yards recorded. Loads are combined in the bailer room and bailed. Once the loads are bailed an average quarterly tonnage is recorded at the Tyson Mill for the Class 1 waste in order to be calculated in tons. However all Class 4 loads are recorded in cubic yards.

Record Keeping and Reporting Comments :
A scale test is performed at the Tyson Feed Mill each quarter to determine the tonnage average for each bail. A separate record sheet is used for class 1 waste and a separate sheet is used for class 4 waste and they are filled out daily. Additionally an excel sheet is filled out monthly recording all waste, tonnage and cubic yards in order to fill out the quarterly report forms accurately. Mr. Curtis informed me that the data is entered and reviewed multiple times to ensure accurate recording. Additionally for all class 4 individual cash disposals. Waste tickets are collected and maintained on site. The tickets meet all regulatory requirements.

Waste Reduction Comments:
The facility does not claim waste reduction.

Annual Engineering Inspection Report (AEIR) Information Comments:
The annual engineering reports for the facility are up to date.

SWDQRF Information Comments:
The facility is up to date on SWDQRF.