ADEQ
ARKANSAS
Department of Environmental Quality

March 27, 2017

Mr. Robert Hendrix
Craighead SWDA
P.O. Box 16777
Jonesboro, AR 72401

RE: Quarterly Inspection conducted on March 23, 2017
AFIN 16-00923
Permit Number 0254-S1-R4

Dear Mr. Hendrix:

The Arkansas Department of Environmental Quality – Office of Land Resources (ADEQ) 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 ADEQ alleges constitute violations of APC&EC Regulation No. 22. A copy of the inspection report is attached.

Please refer to the attached inspection report to note the specific allegations. A written response for the noted allegations, describing the corrective action taken or to be taken must be submitted within thirty (30) calendar days from the date of this letter to the attention of Tobin Baker. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected or persistent may warrant formal enforcement action.

If I can be of any further assistance, please do not hesitate to contact me at (870) 935-7221 or bakert@adeq.state.ar.us.

Sincerely,

Tobin Baker
Solid Waste Inspector
Office of Land Resources

Attachment

cc: Tammie J. Hynum, Acting Sr. Operations Manager, Office of Land Resources

ADEQ
ARKANSAS
Department of Environmental Quality

Arkansas Department of Environmental Quality
Office of Land Resources -Solid Waste Management
Class 1 Landfill Inspection

Site Name	Legacy Landfill	**County**	Craighead	**AFIN**	16-00199
Facility Address	238 CR 476 Jonesboro, AR 72404	**Phone Number**	870-972-6353	**Permit Number**	0254-S1-R4
Permittee Address	Craighead SWDA, P.O. Box 16777, Jonesboro AR 72401	**E-Mail Address**	angela@ccswda.com	**PDS #**	096079
Date	**3/23/2017**	**Entry Time**	**9:10 AM**	**Exit Time**	**11:10 PM**

Regulation 22 – Operational Standards

Category 1

	Regulation	Item Description	Comments
	411(l)	Adequate employee facilities	
	421(a)(b)	Record keeping meets requirements specified by regulations	
	417	Access requirements	
	411(j)	Adequate provisions for backup equipment	
	421(d)	Waste receipt records, ticket system maintained	
	411(k)	Telephone system & written emergency response plan on site	
	423(b)	Annual compliance inspection by registered professional engineer	
	422	Facility implements operating plan and narrative	
	421(f)	Leachate disposal/recirculation records	
	421(g),701	Special waste disposal and procedures records	

Category 2

	Regulation	Item Description	Comments
	411(a)	Operations in accordance with permit documents	
	417(c)	Adequate all weather operational roads	
	411(c)	Smallest practical area, unloading supervised, single working face	
	411(e)	Salvage operations meet approved conditions	
	411(f)(1)	Scavenging of waste prohibited	
	411(p)	Proper wet weather repairs	
	411(b)	Operations by licensed on-site personnel at all times	
	411(d)	Waste spread and compacted as unloaded	
	411(g)	Litter control provisions maintained	
	414(a)	Disease vectors controlled	

Category 2 (continued)

	Regulation	Item Description	Comments
	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);427(f)	Adequate maintenance of intermediate/final cover vegetation	
	415	Gas monitoring program	
X	411(o)	Leachate leaks or evidence of leachate seepage	See Comment Page
	426	Survey controls	
	429	Leachate collection system	
	420	Liquid Restrictions	

Category 3

	Regulation	Item Description	Comments
	412	Implementation of hazardous/unauthorized waste exclusion plan	
X	413(a)(b)	Satisfactory daily/alternative cover	See Comment Page
	413(c)	Satisfactory intermediate cover	
	416(b),411(f)(4)	Open burning prohibited	
	419	Cause discharge/leachate discharge leaving landfill	
	411(f)(3),419(a)(4)	Depositing waste in standing water prohibited	
	411(o)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/Off lined area	

Regulation 22 - Records

421(a)(8), 1203(k)	Date of last groundwater monitoring report			8/4/2016	Site Conditions		Dry		
423(b)	Date of last engineering report			3/31/2016	Weather Conditions		Sunny		
428	Liner construction in progress	Yes/No	No	Notice of liner construction	Yes/No	No	Third party CQA on-site during construction	Yes/No	No
412(a)	Date of last random inspection for unauthorized waste			3/16/2017	Total # for month		18		
415, 421(e)	Date of last quarterly methane monitoring			2/2/2017	Detection level		0 LEL	415(a) Explosive gas records current?	Yes/No Yes
421(g),412(a)(2),701	Date of last special waste received			3/21/2017	Disposal location		Cell 2/3		
421(d)	Previous quarter waste received			4th Quarter 2016	Tons		Class 1- 21,460.39 Class 4-7,368.87		
427(c)	Surface water DMR records current?	Yes/No	Yes						

Fayetteville Shale Related	Yes/No No	Out of Compliance with Fayetteville Shale	Yes/No No

Operator Name & Number	Robert Hendrix 00336	Signature of Inspector	Tobin Barker

Exit Interview Conducted with	Robert Hendrix	Method	On-site	Date	3/23/2017	Time	11:00

Arkansas Department of Environmental Quality
Office of Land Resources Division
Category 2 Comments Page

Site Name	Legacy Landfill	AFIN	16-00199	Permit Number	0254-S1-R4

Additional Comments

Reg. 22.411(o) General Operating Requirements (Leachate Leaks or evidence of leachate seepage)
(a) Daily Cover- Cover Maintenance - The owner or operator shall be responsible for maintaining the cover system integrity and shall promptly repair erosion, washout, tracking, or other defects that result in exposed refuse in either daily or intermediate cover, or exposure of the barrier system of the final cover. Areas of leachate seepage, or areas exhibiting evidence of leachate seepage such as staining and discoloration of the cover system shall also be promptly repaired.

Comment: During this inspection, there were leachate leaks on the east slope of Cell 3 and on the east slope of Cell 4 Unit 2 along the 320 bench road. See Photos 1-4.

Date	3/23/2017	Signature of Inspector	John Baker	Page	1

Arkansas Department of Environmental Quality
Office of Land Resources Division
Category 3 Comments Page

Site Name	Legacy Landfill	AFIN	16-00199	Permit Number	0254-S1-R4

Additional Comments

Reg.22.413- Cover Material Requirements (Satisfactory daily/alternative cover)
(a) Daily Cover- Except as provided in paragraph (d) of this section, the owners or operators of all Class 1 Landfills must cover disposed solid waste with six (6) inches of earthen material at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging and to limit the generation of leachate.

Comment: During this inspection, the alternative cover material was showing through the daily cover soil at the top of Cell 2. See Photos 5-6.

Date	3/23/2017	Signature of Inspector	John Baker	Page	2

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker TB			**Witness**	N/A		
Photo #	1	**Of**	6	**Date**	3/23/2017	**Time**	9:48AM
Description	Leachate leak on the east slope of Cell 3 (looking east)						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker TB			**Witness**	N/A		
Photo #	2	**Of**	6	**Date**	3/23/2017	**Time**	9:48AM
Description	Leachate leak on the east slope of Cell 3 (looking east)						



Revised 3/1/2017

Inspector Signature: Tobin Baker

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker	TB		**Witness**	N/A		
Photo #	3	**Of**	6	**Date**	3/23/2017	**Time**	10:01AM
Description	Leachate leaks on the east slope of Cell 4 Unit 2 (looking east)						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker	TB		**Witness**	N/A		
Photo #	4	**Of**	6	**Date**	3/23/2017	**Time**	10:02AM
Description	Leachate leaks on the east slope of Cell 4 Unit 2 (looking east)						



Inspector Signature: Tobin Baker

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker TB			**Witness**	N/A		
Photo #	5	**Of**	6	**Date**	3/23/2017	**Time**	10:17AM
Description	Alternative cover material showing through daily cover on top of Cell 2 (looking west)						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker TB			**Witness**	N/A		
Photo #	6	**Of**	6	**Date**	3/23/2017	**Time**	10:18AM
Description	Alternative cover material showing through daily cover on top of Cell 2 (looking west)						



Revised 3/1/2017

Inspector Signature: Tobin Baker

Craighead County Solid Waste Disposal Authority
P.O. Box 16777 • Jonesboro, AR 72403 • 870-972-6353 • fax: 870-972-0495

Rec'd Digitally
AFIN: 16-00199
PMT#: 0254-S1-R4
DOC ID#: 71546
TO: TB>file
SWMD

April 7, 2017

Mr. Tobin Baker, ADEQ Inspector
Solid Waste Management Division
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118-5317

Re: Quarterly Inspection; AFN16-00199; Permit Number 0254-S1-R3

Dear Mr. Baker:

I have reviewed the latest Quarterly Inspection Report dated March 23, 2017 and would like to address your comments in the following paragraphs.

While we did have some issues during this inspection, we have been working diligently to have a great landfill with no violations. The last inspection with a single leachate leak was January 2016 and we have kept up our monitoring throughout the year to repair leaks, erosion, and cover issues. However since the January 1st, 2017 through March 30th, we have had 16.50 inches of rain and 7 inches in March alone. The real issue that we have had is that the frequencies of the rain events have been coming about every 3 to 4 days which makes repairs extremely difficult.

The following are the violations mentioned in your letter dated March 27, 2017:

- **Reg. 22.411(o) General Operating Requirements (<u>Leachate Leaks or evidence of leachate seepage</u>)**– Cover Material Requirements: (a) Daily Cover- Cover Maintenance - The owner or operator shall be responsible for maintaining the cover system integrity and shall promptly repair erosion, washout, tracking, or other defects that result in exposed refuse in either daily or intermediate cover, or exposure of the barrier system of the final cover. Areas of leachate seepage, or areas exhibiting evidence of leachate seepage such as staining and discoloration of the cover system shall also be promptly repaired.

Comment: During this inspection, there were leachate leaks on the east slope of Cell 3 and on the east slope of Cell 4 Unit 2 along the 320 bench road. See Photos 1-4.



ADEQ Photo 1



ADEQ Photo 2



ADEQ Photo 3



ADEQ Photo 4

Response: The two leachate leaks shown in the above photographs were repaired the day of the inspection. If you would note in Photos 3 and 4 the extremely wet conditions at the time of the inspection. The day before this inspection we had a 0.57 inch rain recorded at the landfill. The following photographs show our repairs.



CCSWDA Photo #1 - Leachate Leak Repair #1
Dry dirt was hauled in and spread over the area to seal the leak.



CCSWDA Photo #2 - Leachate Leak Repair #2
Dry dirt was hauled in and spread over the area to seal the leak.

- **Reg.22.413- Cover Material Requirements (<u>Satisfactory daily/alternative cover</u>)**
  (a) Daily Cover - Except as provided in paragraph (d) of this section, the owners or operators of all Class 1 Landfills must cover disposed solid waste with six (6) inches of earthen material at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging and to limit the generation of leachate.

Comment: During this inspection, the alternative cover material was showing through the daily cover soil at the top of Cell 2. See Photos 5-6.



ADEQ Photo 5



ADEQ Photo 6

Response: The insufficient daily cover was repaired the same day as the inspection by hauling dry dirt and adding adequate cover as required by Reg. 22.413. See the following photograph of the area.



CCSWDA Photo #3 – Daily Cover Repair

Mr. Baker, I sincerely appreciate you working with us and the cooperation we receive during these inspections. I can assure you and the Department that we will continue with all diligence to maintain the Legacy Landfill to the very best of our ability and in accordance with Regulation 22.

Thanks again for your understanding and consideration.

Respectfully,

Robert D. Hendrix, PE, CFM
Executive Director

RDH:rdh
CC: CCSWDA Board; CCSWDA Staff