ADEQ
ARKANSAS
Department of Environmental Quality

June 21, 2017

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

RE: Quarterly Inspection conducted on June 20, 2017
AFIN 16-00199
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

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 #**	097655
Date	**6/20/2017**	**Entry Time**	**9:00 AM**	**Exit Time**	**11:45 AM**

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	
	411(o)	Leachate leaks or evidence of leachate seepage	
	426	Survey controls	
	429	Leachate collection system	
	420	Liquid Restrictions	

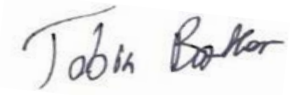
Category 3

	Regulation	Item Description	Comments
	412	Implementation of hazardous/unauthorized waste exclusion plan	
	413(a)(b)	Satisfactory daily/alternative cover	
	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	
X	411(o)	Erosion or other cover defects resulting in exposed refuse	See Comment Page
	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		3/30/2017	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		6/16/2017	Total # for month	20				
415, 421(e)	Date of last quarterly methane monitoring		5/11/2017	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		6/8/2017	Disposal location	Cell 2/3				
421(d)	Previous quarter waste received		1st Quarter 2017	Tons	Class 1- 21,975.33 Class 4-7,354.24				
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	

Exit Interview Conducted with	David Passmore	Method	On-site	Date	6/20/2017	Time	11:30

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.22.411- General Operating Requirements (Erosion or other cover defects resulting in exposed refuse)

(o) 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, erosion with exposed waste was observed on the west slope of Cell 2. See Photos 1-2.

Date	6/20/2017	Signature of Inspector	John Baker	Page	1

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**	2	**Date**	6/20/2017	**Time**	10:24AM
Description	Erosion with exposed waste on west slope of Cell 2 (looking west)						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker TB			**Witness**	N/A		
Photo #	2	**Of**	2	**Date**	6/20/2017	**Time**	10:25AM
Description	Erosion with exposed waste on west slope of Cell 2 (looking west)						



Inspector Signature: Tobin Baker