ADEQ
ARKANSAS
Department of Environmental Quality

September 8, 2017

Mr. Robert Hendrix
Craighead SWDA
P.O. Box 16777
Jonesboro, AR 72403

RE: Quarterly Inspection conducted on September 6, 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, 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 72403 | **E-Mail Address** | rhendrix@ccswda.com | **PDS #** | 099029 |
| **Date** | **9/6/2017** | **Entry Time** | **8:30 AM** | **Exit Time** | **11:00 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 | |
| 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 | |
| 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 | | | 3/22/2017 | 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 | | | 8/28/2017 | Total # for month | | 21 | | |
| 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 | | | 9/6/2017 | Disposal location | | Cell 2/3 | | |
| 421(d) | Previous quarter waste received | | | 2nd Quarter 2017 | Tons | | Class 1- 21,987.71 Class 4-8,363.61 | | |
| 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 Baker |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Exit Interview Conducted with | Robert Hendrix | Method | On-site | Date | 9/6/2017 | Time | 10:50 |

# 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, waste was protruding from the soil on the west slope of Cell 3 near the top of the slope. See Photo 2.**

*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 3. See Photo 1.**

| Date | 9/6/2017 | Signature of Inspector | Tobin 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** | 9/6/2017 | **Time** | 8:49AM |
| **Description** | Erosion with exposed waste on west 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** | 2 | **Date** | 9/6/2017 | **Time** | 9:18AM |
| **Description** | Waste protruding from the soil on the west slope of Cell 3 (looking northwest) | | | | | | |






**Inspector Signature:** Tobin Baker

## Blue, Karen

**To:** Womble, Michelle
**Subject:** RE: Landfill Inspection Response

**From:** Robert Hendrix [mailto:rhendrix@ccswda.com]
**Sent:** Monday, September 18, 2017 10:53 AM
**To:** Baker, Tobin
**Cc:** McWilliams, Scott
**Subject:** Landfill Inspection Response

See the attached pdf for the CCSWDA Response to our most recent landfill inspection.

**Robert D. Hendrix, PE, CFM**
Executive Director
Craighead County Solid Waste Disposal Authority
PO Box 16777 - Jonesboro, AR 72403
238 CR 476 - Jonesboro, AR 72404
PH (870) 972-6353
FAX (870) 972-0495
E-Mail: rhendrix@ccswda.com

Rec'd Digitally

**AFIN:** 16-00199

**PMT#:** 0254-S1-R4

*RECEIVED*
*By bluek at 12:21 pm, Sep 19, 2017*

**DOC ID#:** 72541

**TO:** HL>FILE <KMB

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

September 18, 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 September 8, 2017 and would like to address your comments in the following paragraphs.

***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, waste was protruding from the soil on the west slope of Cell 3 near the top of the slope. See Photo 2.**




ADEQ Photo 2

**CCSWDA Response:**

The insufficient cover material was corrected the next day as is shown in the photograph below.




**CCSWDA Photo 1**

***Reg.22.411- General Operating Requirements (<u>Erosion or other cover defects resulting in exposed refuse</u>)***

*(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 3. See Photo 1.**




ADEQ Photo 1

**CCSWDA Response:**

Additional dirt was hauled in to repair the eroded area and cover the exposed waste as shown the photograph below.




**CCSWDA Photo 2**

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