ADEQ
ARKANSAS
Department of Environmental Quality

April 2, 2018

Mr. Robert Hendrix, Executive Director
Craighead County SWDA
P.O. Box 16777
Jonesboro, AR 72404

RE: Compliance Evaluation Inspection of 02/22/2018
Permit No. 0014-SG-WTX; AFIN 16-00199

Dear Executive Director Hendrix:

The Arkansas Department of Environmental Quality Tire Accountability Program in the Office of Land Resources (ADEQ) conducted a routine Compliance Evaluation Inspection (CEI) of Craighead County SWDA pursuant to the Used Tire Recycling and Accountability Act (Arkansas Code, Annotated, § 8-9-401, *et.seq.*) of 2017, as amended, and Arkansas Pollution Control & Ecology Commission (APC&EC) Regulation No. 36 (Tire Accountability Program) on 02/22/2018. At the time of the inspection, no allegations of noncompliance were noted at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at (501) 682-0582 or mcwilliamss@adeq.state.ar.us.

Sincerely,

Scott McWilliams
Program Manager
Tire Accountability Program
Office of Land Resources

Attachment

cc: Tammie J. Hynum, Tire Accountability Program Sr. Manager
Charles Johnson Regulated Waste Operations Sr. Manager
Chris Krou, Regulated Waste Operations Compliance Branch Manager

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Craighead Co. 238 CR 476, Jonesboro, AR 72403			**Permit**	0014-SG-WTX	**AFIN**	16-00199
Photographer	Clay Dickinson			**Witness**	N/A		
Photo #	1	**Of**	4	**Date**	02-22-2018	**Time**	12:43 pm
Description	Administration building in photo.						



Location	Craighead Cnty. Jonesboro, AR			**Permit**	0014-SG-WTX	**AFIN**	16-00199
Photographer	Clay Dickinson			**Witness**	N/A		
Photo #	2	**Of**	4	**Date**	02-22-2018	**Time**	1:59 pm
Description	Entrance into the tire collection area. Area has a berm all the way around it. No all-weather road around the site. No run-off noted, but water present inside the bermed area.						



Revised 3/1/2017

Inspector Signature:

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Craighead Co.,			**Permit**	0014-SG-WTX	**AFIN**	16-00199
Photographer	Clay Dickinson (CD)			**Witness**	N/A		
Photo #	3	**Of**	4	**Date**	02-22-2018	**Time**	2:00 pm
Description	No all-weather road around the site. Area has a berm all the way around it, however water present inside the bermed area. No run-off noted						



Location	Craighead Cnty. Jonesboro, AR			**Permit**	0014-SG-WTX	**AFIN**	16-00199
Photographer	Clay Dickinson (CD)			**Witness**	N/A		
Photo #	4	**Of**	4	**Date**	02-22-2018	**Time**	2:03 pm
Description	Photo of tire collection/storage trailer. Trailers are filled from the side and emptied usually between 48-and 72 hour.						



Revised 3/1/2017

Inspector Signature:

Arkansas Department of Environmental Quality
Office of Land Resources
Tire Collection Center (TCC) Inspection Form

Site Name	Craighead County, Jonesboro, AR	County	Craighead	AFIN	16-00199
Facility Address	328 CR 476, Jonesboro, AR	Phone Number	(870) 972-6353	Permit Number(s)	0014-SG-WTX
Permittee Address	PO Box 16777, Jonesboro, AR 72404	E-Mail Address	angela@ccswda.com		
Date	2012-02-22	Entry Time	12:41 pm	Exit Time	2:08 pm

Regulation 36 Operational Standards

Regulation			Description	Comments
36.1501			Tire Collection Centers	
			Is the TCC access-controlled? ☒ Yes ☐ No	
			If not, is the TCC operating under a one-time exception granted by ADEQ? ☐ Yes ☐ No	N/A
			Approval Date:	
			Expiration Date:	
36.1502			Permit Required	
		a.	Is the TCC a tire retreading business where tires from tire generators, tire transporters, or the public are kept on property owned, leased or otherwise controlled by the tire retreading business PRIOR to being recycled or disposed by the UTP? ☐ Yes ☒ No	
		b.	Is the TCC one who in the course of business removes tires from rims and the tires removed from the rims are stored for >90 calendar days on property owned, leased, or otherwise controlled by this TCC? ☐ Yes ☒ No	
		c.	Is the TCC a tire retailer that keeps tires from tire generators, tire transporters, or the public PRIOR to being recycled or disposed of by the tire retailer on property owned, leased, or otherwise controlled by the tire retailer? ☐ Yes ☒ No	

Regulation	Description		Comments
	d. Is the TCC a UTP? ☒ Yes ☐ No		
36.1503	Application		
	a. Has the TCC submitted a general permit application on form TAP-6? ☒ Yes ☐ No		
	b. Effective Date of general permit:	2014-06-16	
	c. Expiration Date of general permit:	2019-06-16	
36.1504	Disposal Fees		
	a. Have District residents discarded 4 or fewer tires/month? ☒ Yes ☐ No		The quantity of tires discarded from Jan. 1, 2018 to current day is being tracked but the numbers were not available at the time of the inspection.
	How many residents?	123	
	Quantity of tires discarded since January 1, 2018 by	TBD	
	b. Has the TCC charged any tire generators a fee for discarding tires (small or large) equal to the quantity of tires collected by a tire generator for which rim removal fees have been paid? ☐ Yes ☒ No		
	c. Has the TCC charged any commercial generators a fee for discarding tires (small or large) equal to the quantity of tires that the commercial generator has collected and paid commercial generator fees? ☐ Yes ☒ No		
	d. Has the TCC charged any state or other government entity of Arkansas who purchases tires on a state contract a fee for discarding tires (small or large) equal to the quantity of tires that such entities have paid either a tire generator or commercial generator a rim removal fee? ☐ Yes ☒ No		
	If yes, is the tire generator or commercial generator registered with DFA? ☐ Yes ☐ No		N/A
36.1505	Recordkeeping and Annual Reporting		
	a. Is the TCC retaining records of their activities for 3 years? ☒ Yes ☐ No		

Regulation	Description	Comments
	b. Has the TCC completed and submitted an Annual Report to ADEQ using form TAP-5? ☒ Yes ☐ No If yes, was the Annual Report submitted by June 30? ☐ Yes ☐ No Date of Annual Report Submission: 2017-01-04	
	c. Does the TCC retain records on-site available for inspector? ☒ Yes ☐ No Certifications, sample results, monitoring data, testing or analytical data? ☐ Yes ☐ No ☒ N/A Closure cost estimates and any monitoring, testing, financial assurance records or analytical data? ☐ Yes ☐ No ☒ N/A Any other records required by APC&EC Reg. 36? ☐ Yes ☐ No	N/A
36.1506	Inspections	
	a. Is the TCC conducting inspections of its facility for malfunctions and determination, operator errors, and discharges? ☒ Yes ☐ No	
	b. Any documented release of hazardous constituents to the environment? ☐ Yes ☒ No	
	c. Any documented potential threat to human health or the environment? ☐ Yes ☒ No	
	d. Frequency of inspection (note: minimum of weekly): Daily	
	e. Does the TCC have a written inspection schedule on file? ☐ Yes ☒ No	See 36.1506 (f)

Regulation	Description			Comments
	f. Does the written inspection schedule contain plans for			The facility needs to develop a written inspection schedule covering all the elements noted to the left – 36.1506(f). This should be completed and on file at the facility prior to the 2ND quarter inspection.
	All equipment	☐ Yes	☒ No	
	Safety and emergency equipment	☐ Yes	☒ No	
	Security devices	☐ Yes	☒ No	
	Operating equipment	☐ Yes	☒ No	
	Site conditions	☐ Yes	☒ No	
	Tire storage areas	☐ Yes	☒ No	
	Vegetative growth	☐ Yes	☒ No	
	Berms	☐ Yes	☒ No	
	Buildings	☐ Yes	☒ No	
	g. Is the date and time included for each inspection? ☐ Yes ☒ No			See 36.1506 (f) comment.
	h. Is the name of the TCC personnel conducting the inspection noted? ☐ Yes ☒ No			See 36.1506 (f) comment.
	i. If observations are noted on any inspection, is the date, time and nature of any repairs or remedies noted? ☐ Yes ☒ No			
36.1507	Permit Fee			
	a. Did the TCC submit a $200 permit fee? ☐ Yes ☐ No			N/A Note: The facility has not applied for a new general permit.
	b. If applicable, did the TCC submit the $50 annual fee by June 30? ☐ Yes ☐ No			N/A
36.1508	Storage			
	a. Are there more than 5,000 loose tires or 10,000 compacted and baled tires on-site? ☐ Yes ☒ No			
	b. Is the TCC maintained or operated within 200' of any wetland, transitional wetland, or isolated wetland? ☐ Yes ☒ No			
	c. If yes to "b", are there adequate permanent control methods for residuals in place and is the TCC in compliance with ADEQ water quality standards? ☐ Yes ☐ No			N/A

Regulation	Description	Comments
	d. Is the TCC tire storage area designed and maintained to divert storm water or flood waters around and away from the tire storage areas? ☒ Yes ☐ No	
	e. 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	N/A See 36.1508 (F)
	f. all sides, does the TCC have an ADEQ-issued stormwater permit? ☒ Yes ☐ No If no, does the TCC have an ADEQ approved letter exempting them from needing an ADEQ stormwater permit? ☐ Yes ☐ No	N/A
	g. Does the TCC tire storage area have clear signage indicating the type of used tires? ☐ Yes ☒ No ☐ Waste tires ☐ Used tires culled for resale ☐ Recyclable tires	Facility needs to erect a sign that indicates where tires are to be placed.
	h. Does the TCC tire storage area exceed 50'W X 100'L X 15'H? ☐ Yes ☒ No	
	i. Does the TCC 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	
	j. Does the TCC have a mosquito and rodent control plan? ☐ Yes ☒ No Is it effective at time of inspection? ☐ Yes ☐ No N/A	The facility is required to have mosquito and rodent control for tires stored in the outdoors. A Plan should be developed + implemented before the 2ND quarter inspection.
	k. Does the TCC receive tires from persons other than the operator of the tire storage site? ☒ Yes ☐ No	

Regulation	Description	Comments
	k. If yes, is there a sign posed that is legible from 20' that states the operating hours, cost of disposal, and storage site rates? ☐ Yes ☒ No	The facility should post the regulatory required information on a sign befor the 2nd quarter inspection.
	l. Are operations conducted at the TCC tire storage area equal to or less than 25' of the tire storage area? ☐ Yes ☒ No	
	m. Are the roads to the TCC tire storage area all weather access and passable? ☒ Yes ☐ No	
	n. Is access to the TCC tire storage area controlled by fences, gates, natural barriers or other means approved by ADEQ? ☒ Yes ☐ No	
	o. Does the TCC tire storage area have surface water run-on/run-off controls such as berms and ditches? ☒ Yes ☐ No	
	p. Does the TCC have an annual fire safety survey conducted by a local fire protection authority on file? ☒ Yes ☐ No Date of last survey: 2014-06-09 Fire Authority conducting the survey: South Ridge Fire Dept	
	q. Is the communication equipment maintained? ☒ Yes ☐ No	
	r. Does the TCC have a written emergency preparedness manual? ☒ Yes ☐ No Date of last update: 3-16-2018	
	s. Does the TCC have fire control equipment on-site? (list type and location in the comments section) ☒ Yes ☐ No	Fire extinguishers + fire hydrants
36.1509	Entry	
	Is there adequate access control at the site? ☒ Yes ☐ No	
36.1510	Vector Control	
	Is there an approved vector control program operational for outside tire storage areas? ☒ Yes ☐ No	The facility does not store tires outside on the ground overnight

Regulation	Description	Comments
36.1512	Financial Assurance	
	Does the TCC have financial assurance? ☒ Yes ☐ No	
	Amount: $2,688,000.00	
	Type: LOC and CD	

Regulation 36 Records			
Date of last annual report	2017-11-15		
Date of Emergency Preparedness Manual	2013-12-10 Updated 3-16-2018		
Date of last fire safety inspection	6-9-2014 Needs to be conducted annually		
Number of tires shipped	8908		
Date of last shipment of tires from the facility	02-22-2018		
Quantity of tires stored on-site	2505	Site Conditions	Wet
Amount of tires received	11,413	Weather Conditions	Cloudy 48 degrees F.

Summary of Findings:

At the time of the inspection, no allegations of noncompliance were noted at your facility. There are a few areas that need additional work prior to the 2nd quarter inspection. These are summarized below:

Operator Name & Number	Robert D. Hendrix #003336 Expires 6/30/2018	Signature of Inspector	
Exit Interview Conducted with	Robert Hendrix	Date: 2018-02-22	Time: 2:08am

Summary of findings (continued)

Reg. 36.1504 Please make sure a record is maintained and kept on file showing the information & quantity of tires accepted by individuals & agri businesses.

Reg. 36.1506 Please develop a written inspection schedule covering all the areas noted on this inspection form - 36.1506 (f)(g) and (h).

Reg. 36.1508 Please post a sign at the tire storage area indicating the types of tires (waste, used, or recycled).

Reg. 36.1508 If all tires are always stored inside & under cover the vector control plan can be written to say such. However, if at any point tires are stored outside the facility should have a vector plan on file describing how mosquitos & rodents will be controlled.

Reg. 36.1508 A sign should be posted stating operating hours, cost of disposal & storage site rates.