ADEQ
ARKANSAS
Department of Environmental Quality

June 13, 2018

Angela L. Sparks
Craighead County SWDA
P.O. Box 16777
Jonesboro, AR 72404

RE: Craighead County Jonesboro Tire Collection Center
Quarterly Inspection conducted on May 29, 2018
AFIN: 16-00199
Permit Number: 0014-SG-WTX

Dear Ms. Sparks:

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 Solid Waste Disposal Authority (SWDA) Tire Collection Center (TCC) 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 May 29, 2018.

If I can be of any further assistance, please do not hesitate to contact me at (501) 682-0006 or johnsonk@adeq.state.ar.us.

Sincerely,

Kelli Johnson
Administrative Analyst
Tire Accountability Program
Office of Land Resources

cc: Tammie J. Hynum, Sr. Manager, Tire Accountability Program, Office of Land Resources
Scott McWilliams, Processor and Waste Tire Sites Manager, Tire Accountability Program, Office of Land Resources

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	E-Mail Address	angela@ccswda.com		
Date	2018-05-29	Entry Time	10:40 AM	Exit Time	12:00 PM

Regulation 36 Operational Standards

Regulation	Description	Comments
36.1501	Tire Collection Centers	
	Is the TCC access-controlled? ☑ Yes ☐ No	All perimeters fenced & gated
	If not, is the TCC operating under a one-time exception granted by ADEQ? ☐ Yes ☐ No	
	Approval Date:	
	Expiration Date:	N/A
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	Collects tires only; liberty picks up tires
	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		N/A - permitted with old program; expires 6-16-19.
	b. Effective Date of general permit:	2014-06	
	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		
	How many residents?	463	
	Quantity of tires discarded since January 1, 2018 by	38,970	
	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		Facility only charges for extra-large tires.
	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	1/17/2017	N/A; Annual Report under Reg. 36 is due no later than June 30th
	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		tire manifests, fire safety survey, emergency preparedness manual
36.1506		Inspections		
	a.	Is the TCC conducting inspections of its facility for malfunctions and determination, operator errors, and discharges? ☐ Yes ☑ No		see 36.1506(f)
	b.	Any documented release of hazardous constituents to the environment? ☐ Yes ☑ No		see 36.1506(f)
	c.	Any documented potential threat to human health or the environment? ☐ Yes ☑ No		see 36.1506(f)
	d.	Frequency of inspection (note: minimum of weekly		see 36.1506(f)
	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		
		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	The facility needs to develop and follow a written schedule for the items listed on the left. Should be no less than monthly and must include date/time of inspection, name of employee conducting inspection, notations of observations made and date/nature of any repairs or remedial activities.
		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)
	h.	Is the name of the TCC personnel conducting the inspection noted? ☐ Yes ☑ No		see 36.1506(f)
	i.	If observations are noted on any inspection, is the date, time and nature of any repairs or remedies noted? ☐ Yes ☐ No		N/A
36.1507	Permit Fee			
	a.	Did the TCC submit a $200 permit fee? ☐ Yes ☑ No		Permitted under old law and has not applied for new permit; permit expires 06-16-19
	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

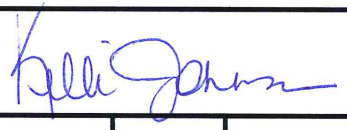
Regulation		Description	Comments
	d.	Is the TCC tire storage area designed and maintained to divert storm water or flood waters around and away from the tire storage areas? ☑ Yes ☐ No	
	e.	If an open-top container or trailer is used as a tire storage area, is the container or trailer covered with a tarp or placed under cover? ☐ Yes ☑ No	N/A - see 36.1508(f) below
	f.	If the tire storage area is open, uncovered, or not enclosed on 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	Sign was posted at entrance of facility.
	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	Facility needs to develop and implement plan to control mosquitoes/rodents.
	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	Sign was posted at entrance of facility.
		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: Southridge Fire Dept.	The fire safety survey needs to be updated and conducted annually.
		q.	Is the communication equipment maintained? ☑ Yes ☐ No	
		r.	Does the TCC have a written emergency preparedness manual? ☑ Yes ☐ No Date of last update: 2018-06-06	Spoke with Angela on 6/6/18 with some follow up questions and during that conversation she advised me that she had updated the emergency preparedness manual.
		s.	Does the TCC have fire control equipment on-site? (list type and location in the comments section) ☑ Yes ☐ No	Fire extinguishers (15), Fire hydrant & Water truck
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		Facility needs to develop and implement an approved vector control plan to control mosquitoes/rodents.

Regulation	Description	Comments
36.1512	Financial Assurance	
	Does the TCC have financial assurance? ☐ Yes ☑ No	
	Amount	
	Type	N/A

Regulation 36 Records			
Date of last annual report	2017-01-04		
Date of Emergency Preparedness Manual	2018-06-06		
Date of last fire safety inspection	2014-06-09		
Number of tires shipped	753		
Date of last shipment of tires from the facility	2018-05-25		
Quantity of tires stored on-site	4452	Site Conditions	Dry
Amount of tires received	42638	Weather Conditions	Cloudy, 79 degrees

Summary of Findings: 36.1506 (A) - Facility needs to inspect for malfunctions/deterioration, operator errors, and discharges monthly. 36.1506 (B) - Facility needs a written schedule to inspect equipment, devices and site conditions. 36.1508 (F) & 36.1510 - Facility needs to develop and implement plan to control mosquitoes/rodents. 36.1508 (L) - Facility needs to have an annual fire safety survey. These need to be addressed before the 3rd Quarterly Inspection.

Operator Name & Number	Angela Sparks (870) 972-6353 License 002390 expires 6/30/2018	Signature of Inspector	

Exit Interview Conducted with	Angela Sparks	Date	2018-05-29	Time	12:00 PM

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Craighead County Jonesboro Tire Collection Center						
Photographer:	Kelli Johnson			**Witness:**	Michelle Womble		
Photo #	1	**Of**	3	**Date:**	5/29/2018	**Time:**	1144
Description:	Looking East – Full Liberty trailer ready for pick-up						



Photographer:	Kelli Johnson			**Witness:**	Michelle Womble		
Photo #	2	**Of**	3	**Date:**	5/29/2018	**Time:**	1144
Description:	Looking North – Tire Collection Center						



Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Craighead County Jonesboro Tire Collection Center						
Photographer:	Kelli Johnson			**Witness:**	Michelle Womble		
Photo #	3	**Of**	3	**Date:**	5/29/2018	**Time:**	1145
Description:	Looking North – Tire Collection Center						

