ADEQ
ARKANSAS
Department of Environmental Quality

December 18, 2018

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

RE: Quarterly Inspection conducted on November 27, 2018
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.

You should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the attached report. Written notification of the corrective actions taken, or to be taken, for the alleged violations must be submitted within thirty (30) calendar days from the date of this letter to the attention of Tobin Baker. This written notification could include, but not be limited to, photographs, receipts, or analytical results, documenting correction of violations. If you have any questions, please do not hesitate to contact me at (870) 935-7221 or bakert@adeq.state.ar.us.

Sincerely,

Tobin Baker

Tobin Baker
Solid Waste Inspector
Office of Land Resources

Attachment

cc: Charles M. Johnson, Senior Manager, Regulated Waste Operations, Office of Land Resources

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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 #**	105820
Date	**11/27/2018**	**Entry Time**	**1045**	**Exit Time**	**1212**

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	Leachate leaks were observed on the east slope of Cell 4 Unit 2 along the 360 Elevation Bench Road. (Refer to Photo #2.)
	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	Erosion cuts with exposed waste were observed on the south slope of Cell 4 Unit 3. (Refer to Photo #1.)
	309(c)	Overfill/Off lined area	

Regulation 22 - Records

421(a)(8), 1203(k)	Date of last groundwater monitoring report			3/12/2018	Site Conditions			Wet	
423(b)	Date of last engineering report			3/30/2018	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			11/24/2018	Total # for month	22			
415, 421(e)	Date of last quarterly methane monitoring			8/7/2018	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			11/27/2018	Disposal location	Cell 2/3			
421(d)	Previous quarter waste received				Tons	Class 1- 22,854.28 Class 4-9,178.45			
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	John Baker

Exit Interview Conducted with	Tim Mayne	Method	On-site	Date	11/27/2018	Time	1200

For ADEQ Use Only

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker, ADEQ Solid Waste Inspector TB			**Witness**	N/A		
Photo #	1	**Of**	2	**Date**	11/27/2018	**Time**	1115
Description	Erosion with exposed waste on the south slope of Cell 4 Unit 3.						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker, ADEQ Solid Waste Inspector TB			**Witness**	N/A		
Photo #	2	**Of**	2	**Date**	11/27/2018	**Time**	1128
Description	Leachate leaks on the east slope of Cell 4 Unit 2.						

