ADEQ
ARKANSAS
Department of Environmental Quality

March 19, 2019

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

RE: Quarterly Inspection conducted on March 8, 2019
AFIN 16-00923
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. 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: Kevin White, Associate Director, 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 #**	107044
Date	**3/8/2019**	**Entry Time**	**0910**	**Exit Time**	**1035**

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	Exposed waste observed protruding through alternate daily cover on the north slope of Cell 2. (Refer to Photo #3 & #4.)
	413(c)	Satisfactory intermediate cover	
	416(b),411(f)(4)	Open burning prohibited	
X	419	Cause discharge/leachate discharge leaving landfill	Leachate observed flowing into the storm water ditch at the base of the west slope of Cell 2. (Refer to Photo #1 & #2.)
	411(f)(3),419(a)(4)	Depositing waste in standing water prohibited	
	411(o)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/Off lined area	

Regulation 22 - Records

421(a)(8), 1203(k)	Date of last groundwater monitoring report		2/12/2019	Site Conditions		Wet			
423(b)	Date of last engineering report		3/30/2018	Weather Conditions		Cloudy			
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		2/28/2019	Total # for month	26				
415, 421(e)	Date of last quarterly methane monitoring		2/5/2019	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		3/5/2018	Disposal location	Cell 2/3				
421(d)	Previous quarter waste received			Tons	Class 1- 23,120.93 Class 4-8,106.08				
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	Angela Sparks	Method	On-site	Date	3/8/2019	Time	1030

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**	4	**Date**	3/8/2019	**Time**	0941
Description	Leachate observed flowing into the storm water ditch at the base of the west slope of Cell 2.						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker, ADEQ Solid Waste Inspector TB			**Witness**	N/A		
Photo #	2	**Of**	4	**Date**	3/8/2019	**Time**	941
Description	Leachate observed flowing into the storm water ditch at the base of the west slope of Cell 2						



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 #	3	**Of**	4	**Date**	3/8/2019	**Time**	948
Description	Exposed waste observed protruding through alternate daily cover on the north slope of Cell 2.						



Location	Legacy Landfill			**Permit**	0254-S1-R4	**AFIN**	16-00199
Photographer	Tobin Baker, ADEQ Solid Waste Inspector	TB		**Witness**	N/A		
Photo #	4	**Of**	4	**Date**	3/8/2019	**Time**	951
Description	Exposed waste observed protruding through alternate daily cover on the north slope of Cell 2.						



Blue, Karen

To: Baker, Tobin
Subject: RE: Response to March Quarterly Inspection

Rec'd Digitally

AFIN: 16-00199

PMT#: 0254-S1-R4

RECEIVED
By Karen Blue at 8:50 am, Apr 24, 2019

DOC ID#: 76126

TO: RH>FILE <KMB

S
W
M
D

From: rhendrix@ccswda.com [mailto:rhendrix@ccswda.com]
Sent: Friday, April 19, 2019 11:05 AM
To: Baker, Tobin
Cc: angela@ccswda.com; David Passmore
Subject: Response to March Quarterly Inspection

Please see attached our response to our most recent landfill inspection.

Robert D. Hendrix, PE, Ex. Dir.
Craighead County Solid Waste Disposal Authority
PO Box 16777 – 238 CR 476
Jonesboro, AR 72403
Ph (870) 972-6353 ext. 5
FAX (870) 972-0495
E-mail: rhendrix@ccswda.com

Virus-free. www.avast.com

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

April 19, 2019

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 March 8, 2019 and would like to address your comments in the following paragraphs.

The following comments are not to present an excuse but rather a factual explanation of our status at the Legacy Landfill. First, we have endured frequent rainfall events that have hindered our landfill maintenance. Since January 1, 2019 to April 19, 2019 we have recorded 26.73 inches of rainfall and 10.91 inches of that has fallen since the last inspection. That being said, we did catch a brief window of time where we were able to repair the leachate leak and attempt to apply additional soil cover to some areas. Work will continue when weather permits.

Reg. 22.413 (a)(b) Satisfactory Intermediate Cover
Comments: Exposed waste observed protruding through alternate daily cover on the north slope of cell 2.

Response: Due to the frequent rain events repairs are not complete at this time. Work will continue as weather improves.

Reg. 22.419 Cause discharge/leachate discharge leaving landfill
Comments: Leachate was observed flowing into the storm water ditch at the base of the west slope of Cell 2.

Response: The leachate leak has been repaired as shown in the following photographs.



CCSWDA Photo #1



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
Enc.: 2019 Rainfall Data

Craighead County Solid Waste Disposal Authority

Rainfall Log

LEGACY LANDFILL

DATE	DIGITAL	ANALOG	REMARKS
1-3-19		0.20"	Slow Rainfall
1-4-19		0.85"	Slow Rain
1-14-19		1.06"	Slow soaking rain
1-17-19		0.24"	Slow [redacted] Rainfall
1-21-19		1.23"	Rain & Sl[redacted]ow mix
1-23-19		0.85"	Slow soaking Rain
2-12-19		6.97"	Flash Floods and all day rains
2-18-19		0.34"	Slow Rain
2-20-19		2.03"	Hard Rain at times
2-25-19		2.05"	Flash Flood
3-11-19		0.87	Hard Rain
3-14-19		2.85"	Flash Floods
4-5-19		1.04"	Steady Rainfall
4-8-19		0.75"	Slow Rain
4-12-19		0.70"	Slow Rain
4-15-19		2.45"	Steady Rainfall hard at Times
4-19-19		2.25"	STEADY ALL DAY THEN HEAVY OVERNIGHT

26.73" TOTAL TO DATE (4/19/2019)
10.91" TOTAL SINCE 3/8/2019