ARKANSAS ENERGY & ENVIRONMENT | ENVIRONMENTAL QUALITY

April 7, 2020

The Honorable Robert Akin
Drew County Judge
210 South Main Street
Monticello, AR 71655

RE: Quarterly Inspection conducted on February 27, 2020
AFIN 22-00040
Permit Number 0282-S4-R1

Dear Judge Akin:

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) 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 DEQ alleges constitutes violations. A copy of the inspection report is attached.

You should immediately initiate actions to correct the alleged violations cited. A written response of the corrective actions taken, or to be taken, must be submitted within thirty (30) calendar days from the date on this letter to the attention of Gerry Eddy. The response may include, but is not limited to, photographs, copies of disposal receipts, records, or analytical results, as applicable. If you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 837-6916 or eddy@adeq.state.ar.us.

Sincerely,

Gerry Eddy
Solid Waste Inspector
Office of Land Resources

Enclosure

cc: David Witherow P.E., Senior Manager, Office of Land Resources

ARKANSAS ENERGY & ENVIRONMENT | ENVIRONMENTAL QUALITY

Division of Environmental Quality
Office of Land Resources - Solid Waste Management
Class 4 Landfill Inspection

Site Name	Drew County Class 4 Landfill	**County**	Drew	**AFIN**	22-00040
Facility Address	163 Landfill Road Monticello, AR	**Phone Number**	870-367-4258	**Permit Number**	0282-S4-R1
Permittee Address	210 Main Street Monticello, AR 71655	**E-Mail Address**		**PDS #**	111521
Date	**2/27/2020**	**Entry Time**	**1040**	**Exit Time**	**1215**

Regulation 22 – Operational Standards

Category 1

	Regulation	Item Description	Comments
	607(l)	**Adequate employee facilities**	
	617(a)(b)	**Record keeping meets requirements specified by regulations**	
	613	**Access requirements**	
	607(j)	**Adequate provisions for backup equipment**	
	617(c)	**Waste receipt records, ticket system maintained**	
	607(k)	**Telephone system & written emergency response plan on site**	
	619(a)	**Annual compliance inspection by registered professional engineer**	
	618	**Facility implements operating plan and narrative**	
	701	**Special waste disposal and procedures records**	

Category 2

	Regulation	Item Description	Comments
	607(a)	**Operations in accordance with permit documents**	
	613(c)	**Adequate all weather operational roads**	
	607(c)(d)	**Smallest practical area, single working face**	
	607(e)	**Salvage operations meet approved conditions**	
	607(f)(1)	**Scavenging of waste prohibited**	
	613 (c)	**Proper wet weather repairs**	
	607(b)	**Operations by licensed on-site personnel at all times**	
	607(d)	**Waste spread and compacted as unloaded**	
	607(g)	**Litter control provisions maintained**	
	610(a)	**Disease vectors controlled**	
	611	**Gas monitoring program**	
	622	**Survey controls**	

Category 2 (continued)

	Regulation	Item Description	Comments
	623	Surface water controls	
	607(h)(1)	Contouring prevents surface water flowing into or through waste	
X	614(a)	Run-on/off control system present and adequate	No run-on control system present to prevent flow into active trench (Refer to Photo 1.)
	607(h)(2)	Surface water control prevents off-site sediment accumulation	
	607(h)(i)(o)	Adequate maintenance of intermediate/final cover vegetation	
	607(o)	Leachate leaks or evidence of leachate seepage	
	616	Liquid restrictions	

Category 3

	Regulation	Item Description	Comments
X	608(b)	Separation of Unauthorized Wastes	Class 1 waste observed in current trench. (Refer to Photos #2 & #3.)
X	609(a)	Satisfactory weekly or more frequent cover	According to Operator Elvin Ingram, weekly cover was not being applied. (Refer to Photo 4.)
	609(b)	Satisfactory intermediate cover	
	612(b),607(f)(4)	Open burning prohibited	
X	615(a)(5)	Cause discharge/leachate discharge leaving landfill	Leachate observed being pumped from the active trench and allowed to flow off landfill property. (Refer to Photos 5 – 10.)
	607(f)(3),615(a)(4)	Depositing waste in standing water prohibited	
	607(o)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/off lined area	

Regulation 22 - Records

617(a)(4), 621(e)	Date of last groundwater monitoring report		N/A				Site Conditions	Wet	
619	Date of last engineering report	7/24/2019					Weather Conditions	Sunny	
617(a)(4)	Liner construction in progress	Yes/No	No	Notice of liner construction	Yes/No	N/A	Third part CQA on-site during construction	Yes/No	N/A
608	Date of last random inspection for unauthorized waste		Not reviewed	Total # for month					
611	Date of last quarterly methane monitoring		N/A	Detection level	N/A	611	Explosive gas records current?	Yes/No	N/A
701	Date of last special waste received		N/A	Disposal location	N/A				
617(c)	Previous quarter waste received		Not reviewed	Tons					
623	Surface water DMR records current	Yes/No							

Operator Name & Number	Elvin Ingram 002499 David Fay 004064		Signature of Inspector	Amy Eddy			
Exit Interview Conducted with	Elvin Ingram and County Judge Robert Akin	Method	On-site	Date	2/27/2020	Time	1200

Division of Environmental Quality (DEQ)
Official Photograph Sheet

Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	Cristina Coker, Engineer		
Photo #	1	**Of**	10	**Date**	2/27/2020	**Time**	1052
Description	No run-on control system observed to prevent flow into the active trench.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	Cristina Coker, Engineer		
Photo #	2	**Of**	10	**Date**	2/27/2020	**Time**	1019
Description	Class 1 waste observed in the current trench.						



Division of Environmental Quality (DEQ)
Official Photograph Sheet

Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	Cristina Coker, Engineer		
Photo #	3	**Of**	10	**Date**	2/27/2020	**Time**	1120
Description	Class 1 waste observed in the current trench.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	Cristina Coker, Engineer		
Photo #	4	**Of**	10	**Date**	2/27/2020	**Time**	1117
Description	Operator Elvin Ingram stated weekly cover is not being applied.						



Division of Environmental Quality (DEQ)
Official Photograph Sheet

Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	Cristina Coker, Engineer ADEQ		
Photo #	5	**Of**	10	**Date**	2/27/2020	**Time**	1053
Description	Leachate observed being pumped from the active trench. The picture shows the suction line in the leachate filled trench.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	Cristina Coker, Engineer ADEQ		
Photo #	6	**Of**	10	**Date**	2/27/2020	**Time**	1050
Description	Leachate observed being pumped from the active trench. The discharge line (Red Arrow) and leachate flow (Blue Arrow) are shown.						



Division of Environmental Quality (DEQ)
Official Photograph Sheet

Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	N/A		
Photo #	7	**Of**	10	**Date**	2/27/2020	**Time**	1138
Description	Leachate flow from the trench observed.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	N/A		
Photo #	8	**Of**	10	**Date**	2/27/2020	**Time**	1138
Description	Leachate flow observed along the landfill access road						



Division of Environmental Quality (DEQ)
Official Photograph Sheet

Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	N/A		
Photo #	9	**Of**	10	**Date**	2/27/2020	**Time**	1211
Description	Leachate flowing into culvert at the landfill boundary observed.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	N/A		
Photo #	10	**Of**	10	**Date**	2/27/2020	**Time**	1212
Description	Leachate flow observed exiting the culvert and off the landfill property.						

