ARKANSAS ENERGY & ENVIRONMENT | ENVIRONMENTAL QUALITY

August 6, 2020

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

RE: Quarterly Inspection conducted on July 30, 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**	drewcojudge@sbcglobal.net	**PDS #**	112907
Date	**7/30/2020**	**Entry Time**	**1000**	**Exit Time**	**1100**

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	Extension granted until 9/29/2020.
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	
	614(a)	Run-on/off control system present and adequate	
	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
	608(b)	Separation of Unauthorized Wastes	
X	609(a)	Satisfactory weekly or more frequent cover	According to Operator Elvin Ingram, weekly cover was not being applied. (Refer to Photo 1.)
	609(b)	Satisfactory intermediate cover	
	612(b),607(f)(4)	Open burning prohibited	
	615(a)(5)	Cause discharge/leachate discharge leaving landfill	
	607(f)(3),615(a)(4)	Depositing waste in standing water prohibited	
X	607(o)	Erosion or other cover defects resulting in exposed refuse	Unsatisfactory intermediate cover observed on previous trench. Solid waste observed exposed. (Refer to Photos #2 & #3.)
X	309(c)	Overfill/off lined area	Observed in DEQ Document ID 78203.

Regulation 22 - Records

617(a)(4), 621(e)	Date of last groundwater monitoring report		N/A			Site Conditions	Dry		
619	Date of last engineering report	7/24/2019				Weather Conditions	Clear		
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	7/21/2020	Total # for month	7 (June 2020)					
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	166	Tons	2nd Qt. 2020					
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	Method	On-site	Date	7/30/2020	Time	1100

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 #	1	**Of**	3	**Date**	7/30/2020	**Time**	1038
Description	View of current trench. Weekly cover was not being applied according to Operator.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	N/A		
Photo #	2	**Of**	3	**Date**	7/30/2020	**Time**	1040
Description	Unsatisfactory intermediate cover observed on previous trench. Solid waste observed exposed.						



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 #	3	**Of**	3	**Date**	7/30/2020	**Time**	1040
Description	Unsatisfactory intermediate cover observed on previous trench. Solid waste observed exposed.						

