ARKANSAS
ENERGY & ENVIRONMENT

2/4/2021

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

RE: Inspection conducted on February 1, 2021
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
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

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

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 #**	114870
Date	**2/1/2021**	**Entry Time**	**1155**	**Exit Time**	**1258**

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**	
X	**607(d)**	**Waste spread and compacted as unloaded**	Two (2) accumulations of solid waste observed away from the active trench were not spread or compacted after being unloaded. (Refer to Photos #1 & #2.)
	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
X	608(b)	Separation of Unauthorized Wastes	According to the operator, David Fay, no periodic inspections of incoming waste are being performed to identify and prevent unauthorized waste from entering the approved Class 4 waste stream.
	609(a)	Satisfactory weekly or more frequent cover	
	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	
	607(o)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/off lined area	Identified in DEQ Document ID 78203.

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	8/10/2020				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	None	Total # for month	None					
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	1.218	Tons	4th 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	David Fay	Method	On-site	Date	2/1/2021	Time	1255

Division of Environmental Quality
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**	2	**Date**	2/1/2021	**Time**	1224
Description	Solid waste observed away from the active trench not spread or compacted after being unloaded.						



Location	Drew County Class 4 Landfill			**Permit**	0282-S4-R1	**AFIN**	22-00040
Photographer	Gerry Eddy, Inspector			**Witness**	N/A		
Photo #	2	**Of**	2	**Date**	2/1/2021	**Time**	1226
Description	Solid waste observed away from the active trench not spread or compacted after being unloaded.						

