ARKANSAS
ENERGY & ENVIRONMENT

6/16/2021

The Honorable Toby Davis
Perry County Judge
310 West Main Street
PO Box 358
Perryville, AR 72126

RE: Inspection conducted on May 5, 2021
AFIN 53-00029
Permit Number 0264-S

Dear Judge Davis,

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 Kim Davenport. 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) 682-0586 or davenportk@adeq.state.ar.us.

Sincerely,

Kim Davenport
Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Nicholas Jones P.E., Senior Manager, Office of Land Resources

ARKANSAS
ENERGY & ENVIRONMENT

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

Site Name	Perry County Class 4 Landfill	**County**	Perry	**AFIN**	53-00029
Facility Address	115 Casa Aplin Ave, Casa, AR	**Phone Number**	501-889-5128	**Permit Number**	0264-S
Permittee Address	Perry County Courthouse, PO Box 358, Perryville, AR 72126	**E-Mail Address**	Pcjudge1@windstream.net	**PDS #**	116374
Date	**5/5/2021**	**Entry Time**	**1215**	**Exit Time**	**1320**

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
X	623	Surface water controls	The landfill is not graded to provide a positive means of runoff, resulting in ponded areas across the top of the landfill. (Refer to Photos # 1 - #5.)
	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	Vegetation requires mowing to prevent the growth of woody vegetation and seeding to prevent bare spots and control erosion. (Refer to Photos #1 - #9.)
	607(o)	Leachate leaks or evidence of leachate seepage	
	616	Liquid restrictions	

Category 3

	Regulation	Item Description	Comments
	608	Implementation of hazardous waste exclusion plan	
	609(a)	Satisfactory weekly or more frequent cover	
X	609(b)	Satisfactory immediate cover	Exposed waste observed on southern, southeastern, and eastern slopes. No waste reported disposed since the 2nd Quarter of 2019. (Refer to Photos #5 - #8.)
	612(b),607(f)(4)	Open burning prohibited	
	615	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	

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			6/29/2020				Weather Conditions	Sunny	
617(a)(4)	Liner construction in progress	Yes/No	No	Notice of liner construction	Yes/No	No		Third part CQA on-site during construction	Yes/No	N/A
608	Date of last random inspection for unauthorized waste			N/A	Total # for month	N/A				
611	Date of last quarterly methane monitoring			N/A	Detection level		611	Explosive gas records current?	Yes/No	N/A
701	Date of last special waste received			N/A	Disposal location					
617(c)	Previous quarter waste received			0	Tons	No waste reported since 2nd quarter 2019				
623	Surface water DMR records current	Yes/No								

Operator Name & Number	NA-Facility is not open		**Signature of Inspector**				
Exit Interview Conducted with	Judge Davis	**Method**	Via phone	**Date**	5/13/2021	**Time**	1352

Division of Environmental Quality
Official Photograph Sheet

Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	1	**Of**	9	**Date**	5/5/2021	**Time**	1221
Description	A southern view across the cap shows ponding water in deep ruts.						



Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	2	**Of**	9	**Date**	5/5/2021	**Time**	1221
Description	A southeastern view across the cap shows additional ruts with ponding water.						



Division of Environmental Quality
Official Photograph Sheet

Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	3	**Of**	9	**Date**	5/5/2021	**Time**	1221
Description	A western view across the cap shows ponding water in a depression.						



Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	4	**Of**	9	**Date**	5/5/2021	**Time**	1228
Description	A northern view to observe ponding water in a depression on the cap.						



Division of Environmental Quality
Official Photograph Sheet

Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	5	**Of**	9	**Date**	5/5/2021	**Time**	1226
Description	Ponding water and exposed waste observed in a bare area on the landfill cap, looking north.						



Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	6	**Of**	9	**Date**	5/5/2021	**Time**	1223
Description	One (1) example of exposed waste observed on the eastern slope is observed.						



Division of Environmental Quality
Official Photograph Sheet

Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	7	**Of**	9	**Date**	5/5/2021	**Time**	1224
Description	An erosion rill with exposed waste is observed on the southwestern slope of the landfill.						



Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	8	**Of**	9	**Date**	5/5/2021	**Time**	1225
Description	One (1) example of the exposed waste observed on the southern portion of the landfill is observed.						



Division of Environmental Quality
Official Photograph Sheet

Location	Perry County Class 4 Landfill			**Permit**	0264-S	**AFIN**	53-00029
Photographer	Kim Davenport, Inspector			**Witness**	N/A		
Photo #	9	**Of**	9	**Date**	5/5/2021	**Time**	1220
Description	A southeast view of the landfill cap shows woody vegetation (red arrow) near the access road.						

