DIVISION OF
ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

5/23/2025

Anna Grace Foreman
Blackstone Construction
444 Hedgepath Rd
Russellville AR, 72802

**RE: Inspection conducted on April 25, 2025**
**AFIN 53-00029**
**Permit Number 0264-S**

Dear Ms. Foreman,

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 Rule, codified as 8 CAR § 60 (Solid Waste Management Rules), and the above-referenced permit. The inspection identified conditions at your facility which the DEQ alleges are 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 Daniel Cullum. 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) 258-3144 or daniel.cullum@arkansas.gov.

Sincerely,

Daniel Cullum

Daniel Cullum
Solid Waste Inspector

cc: Ryan Hayden, Senior Compliance Manager, Office of Land Resources

# Division of Environmental Quality - Office of Land Resources
# Class 4 Landfill Inspection Form

| | | | | | |
|---|---|---|---|---|---|
| **Site Name** | Perry County Class 4 Landfill (Blackstone Construction) | **County** | Perry | **AFIN** | 53-00029 |
| **Facility Address** | 115 Casa Aplin Rd, Casa, AR | **Phone #** | 870-405-5885- Anna | **Permit #** | 0264-S |
| **Permittee Address** | 444 Hedgepath Rd Russellville AR, 72802 | **Email Address** | aforeman@bscasphalt.com | **PDS #** | 133497 |
| **Date** | 04/25/2025 | **Entry Time** | 1034 | **Exit Time** | 1108 |

## Operational Standards

### Category 1

| | Citation | Description | Comments |
|---|---|---|---|
| | **8 CAR § 60-617** | Record Keeping Requirements | |
| | **8 CAR § 60-607(j)** | Adequate Provisions for Backup Equipment | |
| | **8 CAR § 60-619** | Annual Engineering Inspection Report | |
| | | | |

### Category 2

| | Citation | Description | Comments |
|---|---|---|---|
| | **8 CAR § 60-607(a)** | Operations in Accordance with Permit Documents | |
| | **8 CAR § 60-613(c)** | Access and Operational Roads | |
| | **8 CAR § 60-607(c)** | Working Face | |
| | **8 CAR § 60-607(b)** | Operations by Licensed On-site Operator at All Times | |
| | **8 CAR § 60-607(g)** | Litter Control | |
| | **8 CAR § 60-622** | Survey Controls | |
| | **8 CAR § 60-623** | Surface Water Controls | |
| | **8 CAR § 60-607(h)(1)** | Contouring Prevents Surface Water Flowing Into or Through Waste | |
| | **8 CAR § 60-607(h)(2)(A)** | Surface Water Control Prevents Off-site Sediment Accumulation | |
| | **8 CAR § 60-607(i)** | Final Cover Vegetation and Maintenance | |
| | **8 CAR § 60-607(o)(2)** | Leachate Leaks or Evidence of Leachate Seepage | |
| | | | |

### Category 3

| | Citation | Description | Comments |
|---|---|---|---|
| | **6088 CAR § 60-608** | **Implementation of Hazardous Waste Exclusion Plan** | |
| | **8 CAR § 60-609(a)** | **Satisfactory Weekly or More Frequent Cover** | |
| | **8 CAR § 60-609(b)** | **Satisfactory Intermediate Cover** | |
| | **8 CAR § 60-615(a)(5)** | **Allow Leachate Unpermitted by NPDES to Leave the Landfill** | |
| | **8 CAR § 60-607(o)(1)** | **Erosion or Other Cover Defects Resulting in Exposed Refuse** | Exposed waste was observed on the south slope and on top of landfill. (Refer to Photos #1 - #8) |
| | **8 CAR § 60-309(c)** | **Overfill / Off Lined Area** | |
| | | | |

### Records

| | | | |
|---|---|---|---|
| **Date of Last Annual Report** | 06/30/2024 | **Date of Last Quarterly Methane Monitoring** | NA |
| **Date of Last Groundwater Monitoring Report** | NA | **Previous Quarter Waste Received** | No waste taken |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Operator Name & Number** | Not in operation | **Signature of Inspector** | | |  | | | |
| **Exit Interview Conducted with** | Anna Foreman | **Method** | Via Phone | **Date** | 05/05/2025 | **Time** | 1055 | |

# Division of Environmental Quality
# Official Photograph Sheet

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 1 | **of** | 8 | **Date** | 04/25/2025 | **Time** | 1047 |
| **Description** | View of exposed waste on south slope. | | | | | | |



| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 2 | **of** | 8 | **Date** | 04/25/2025 | **Time** | 1048 |
| **Description** | View of exposed waste on south slope. | | | | | | |



# Division of Environmental Quality
# Official Photograph Sheet

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 3 **of** 8 | | | **Date** | 04/25/2025 | **Time** | 1048 |
| **Description** | View of exposed waste on south slope. | | | | | | |



| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 4 **of** 8 | | | **Date** | 04/25/2025 | **Time** | 1048 |
| **Description** | View of exposed waste on south slope. | | | | | | |



# Division of Environmental Quality
# Official Photograph Sheet

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 5 | **of** | 8 | **Date** | 04/25/2025 | **Time** | 1049 |
| **Description** | View of exposed waste on top of landfill. | | | | | | |



| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 6 | **of** | 8 | **Date** | 04/25/2025 | **Time** | 1050 |
| **Description** | View of exposed waste on top of landfill. | | | | | | |



# Division of Environmental Quality
# Official Photograph Sheet

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 7 | **of** | 8 | **Date** | 04/25/2025 | **Time** | 1051 |
| **Description** | View of exposed waste on top of landfill. | | | | | | |



| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Location** | Perry County Class 4 Landfill (Blackstone Construction) | | | **Permit** | 0264-S | **AFIN** | 53-00029 |
| **Photographer** | Daniel Cullum DC | | | **Witness** | Kim Davenport | | |
| **Photo #** | 8 | **of** | 8 | **Date** | 04/25/2025 | **Time** | 1051 |
| **Description** | View of exposed waste on top of landfill. | | | | | | |

