



Arkansas Department of Environmental Quality  
Solid Waste Management Division  
Complaint/Illegal Dump Investigation Worksheet



**Complaint Lodged Against:**

Bruner Ivory Handle Company  
500 N. Laurel Street  
Rick Thomas / President / 423-580-8490  
180 Dogwood Lane  
South Pittsburg, TN 37380

Page 1 of 2

County: Hempstead

AFIN: 10-00000

PDS ID: 3631

Access ID:

**Complainant Name & Address:**

Unknown

☒ Valid

☐ Invalid

☐ Unknown

**Location Description:**

500 N. Laurel Street , Hope, Ar.

**Complaint Description of Waste:** Wood waste with other miscellaneous items.

**Complaint Received by:** Sheldon Hadley

**Date Received:** June 6, 2006

**Section 1: Size of Waste Mass**

Pts Points Total

Length		>640 yd <sup>3</sup>	5		0
Width		320 yd <sup>3</sup> to 640 yd <sup>3</sup> = 16 roll offs	5		0
Height		160 yd <sup>3</sup> to 320 yd <sup>3</sup> = 8 roll offs	4	4	20
Total		80 yd <sup>3</sup> to 160 yd <sup>3</sup> = 4 roll offs	3		0
Approx. Cyd		40 yd <sup>3</sup> to 80 yd <sup>3</sup> = 2 roll offs	2		0
		40 yd <sup>3</sup> or < = 1 roll off	1		0
		{Section 1 Multiplier=5}	Size of Waste Mass Score		20

**Section 2: Contents of Waste Mass**

Pts Points Total

Household Waste	5		0	
Hazardous items {i.e. paint thinner, cleaning chemicals, oil cans, herbicides, medical waste, asbestos}	5		0	
White Waste {i.e. Refrigerators and appliances that may contain Freon}	3		0	
Construction/Demolition Waste	3	3	9	
Approximate Number of Tires:	3		0	
Abandoned Vehicles /Auto Parts: {May contain gasoline, oil, antifreeze or other automotive fluids}	2		0	
Other Bulky Waste: {i.e. TV's, Furniture, Mattresses, etc.}	2		0	
Yard Waste	1		0	
Dead Animals	4		0	
Other			0	
{Section 2 Multiplier = 3}		Contents of Waste Mass Score		9

*Sheldon Hadley*

Section 3: Site Assessment		Pts	Points	Total
Air Pollution	Open Burning	5		0
Air Pollution	Evidence of Open Burning	4		0
Air Pollution	Strong; Foul Order Present	3		0
Water Pollution	Waste in or near standing or flowing water	5		0
Water Pollution	High probability of leachate (run-off) into ground/surface water	5	5	20
Public Health Risk Assessment	Vectors sighted	5		0
Public Health Risk Assessment	Evidence of Vectors {i.e. rats, flies, mosquitoes, snakes, scavengers}	4		0
Public Health Risk Assessment	Public Nuisance {i.e. feces and/or eggs and/or tunnels}	3	3	12
Site Usage Assessment	Site attended or maintained for a fee	5		0
Site Usage Assessment	History of previous complaints	5		0
Site Usage Assessment	Active, attractive nuisance; evidence of recent dumping	5	5	20
Site Usage Assessment	Dumping resumed at cleaned up or closed site	4		0
Site Usage Assessment	Old Site; no evidence of recent dumping; overgrown	2		0
{Section 3 Multiplier = 4}		<b>SITE ASSESSMENT SCORE</b>		<b>52</b>
		<b>TOTAL for Section 1 &amp; 2</b>		<b>29</b>
Date Investigated: 6-6-06		Time Investigated: 1520		(F9) <b>TOTAL SCORE</b> <b>81</b>
GIS: Not taken				
Section 4: Violations				
Solid Waste Management Act §8-6-205				
	(a)(2) To construct, install, alter, modify, use or operate any solid waste processing or disposal facility or disposal site without a permit from the department			
	(a)(3) To dispose of solid wastes at any disposal site or facility other than a disposal site or for which a permit has been issued by the department			
	(a)(3) Individual's household disposal that creates a public or private nuisance or a hazard to health and/or violates a city ordinance or other law and/or involves the open dumping of garbage			
	(a)(4) To dump, deposit, throw, or in any manner leave or abandon any solid wastes upon property owned by another person without the written permission of the owner or upon public property			
X	(a)(5) To sort, collect, transport, process, or dispose of solid waste contrary to the rules, regulations or orders of the department, or create or likely to create a public nuisance or public health hazard or to cause or likely to cause water or air pollution (Ark. Water and Air Pollution Control Act §8-4-101 et seq)			
	(a)(5)(b) A rebuttal presumption when one (1) or more items of solid waste bear the name to indicate that the person committed the unlawful act of disposal			
Waste Tire Regulations #14 §9, Prohibitions:				
	Tires disposed unless part of a permitted processing/collection facility			
	Caused or permitted the open burning of tires			
Air Pollution Control Code §8-4-310(a)(1)(2)(3)				
	5)(a) No person shall cause or permit the open burning of refuse, garbage, trade wastes or other waste material, or shall conduct a salvage operation by open burning			
Litter Act §8-6-406				
X	Dispose of litter upon any public or private property or into any body of water			
	Vehicle is not covered to prevent the contents from departing from vehicle			
Final Disposition				
	Investigated – Letter Sent		Investigated – No Evidence Found	
X	No Further Action Required		Complaint Forwarded To:	

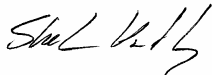
*Shelley*

## Complaint Investigation and Illegal Dump Worksheet Attachment

<b>Location:</b> Bruner Ivory Handle Mill 500 N Laurel, Hope, Ar.		<b>County:</b> Hempstead	
<b>Inspector:</b> Sheldon Hadley		<b>Date:</b> 6-6-06	
<input type="checkbox"/>	<b>Follow-Up Investigation</b>	<b>PDS ID:</b>	<b>Access ID:</b>
<p><b>Comments:</b> 6-6-06 I received an E-mail from Mary Pearson (ADEQ Hazardous Waste) thru Heid Love (ADEQ Solid Waste Supervisor) regarding a possible solid waste issue at the Bruner Ivory Handle Mill in Hope, Ar. This facility is no longer in operation. I spoke with Ronnie Smith (ADEQ Water Inspector) who stated that he had been out with Mary Pearson and the Hope Code enforcement officer to the site. I then went to the site where I noted that the facility well fenced and behind a locked gate. I then went around to the south side of the property where I could see a portion of the area in question. I noted what appeared to be mostly wood waste with some other miscellaneous items. I have attached a copy of the NPDES Compliance Inspection performed by Ronnie Smith. At this point the situation is being handled by the people mentioned above. I will assist in the future if needed.</p>			
<b>FURTHER ACTION TAKEN/TO BE TAKEN</b>			

**Inspector Signature**

Form Revised 12-12-03



**Date** 6-6-06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## NPDES Compliance Inspection Report

### Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type											
1	N	2	5	3	A	R	R	0	0	A	2	7	8	11	12	0	6	0	2	0	6	17	18	V	19	S	20	2					
Remarks																																	
0 9 - 0 0 1 2 2																																	
Inspection Work Days								Facility Evaluation Rating								BI		QA		-----Reserved-----													
67								70								71		72		73		74		75		80							

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Bruner Ivory Handle Company 500 N. Laurel Street	Entry Time /Date 1000 / 2-6-06	Permit Effective Date 11-1-02
	Exit Time/Date 1425 / 2-6-06	Permit Expiration Date 10-31-07
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Satterwhite / Overseer / 870-887-9885		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Rick Thomas / President / 423-580-8490 180 Dogwood Lane South Pittsburg, TN 37380		
Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	U	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Sampling
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This reconnaissance inspection was done at the request of the NPDES Storm Water Section. The Bruner Ivory handle Company had requested to terminate the Industrial Storm Water Permit. The facility had ceased operations in late 2004.

This facility was in the wood handle making business. It had been in business in Hope for at least 70+ years. The property looked as if everyone dropped what they were doing and walked away the last day of operations.

For findings see attached page 2

Name(s) and Signature(s) of Inspector(s) Red Smith	Agency/Office/Telephone/Fax ADEQ / District 10 / 870-777-7585 / 870-777-7560	Date March 10, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

## ATTACHMENT

ARR00A278

Page 2

**Findings:** The facility had left numerous barrels of what appeared to be paint and oil outside of any buildings in the weather. There was a hydraulic pump unit that still had oil in the tank. This tank was uncovered and had exposure to the elements. There was a truck loading dock below ground level that was full of water and old pallets. In front of the shop area there were several barrels of oil that were not contained. One of the buildings was used as a power house until the early 60's. The facility generated electricity by burning the waste wood. This electricity was used by the facility and sold to a local power company. Lightning struck the building and knocked out the system. It was never rebuilt. At the time of the inspection, the roof over the area was gone. Inside there were two turbines. Both of these were over a pit that was full of oily, rusty looking water. These pits at one time held oil to cool the turbines. No one knows what happened to the oil. There was a building where the handles were dipped in the varnish. This was done in two pits. These pits have dried varnish in and around them. There is a 12000-15000 gallon storage tank connected to this building by pipes. This tank is in an unsecured location outside the security fence. This whole property is approximately 25 acres. Most all of the buildings are old and not very structurally sound. In some cases the metal roofs are about to come off.

It is my opinion that the Hazardous Waste Division be contacted because of what is and what may be inside the buildings.







