



June 6, 2019

Mr. Heath Lockley
BFI Waste Systems of Arkansas, LLC.
18511 W. Sardis Road
Bauxite, AR 72011

RE: Quarterly Inspection conducted on May 16, 2019
AFIN 63-00155
Permit Number 0261-S1-R3

Dear Mr. Lockley:

The Arkansas Department of Environmental Quality Office of Land Resources (ADEQ) 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 ADEQ alleges constitute violations. A copy of the inspection report is attached.

You should immediately initiate all actions necessary to resolve and correct the alleged violations cited in the attached report. Written notification of the corrective actions taken, or to be taken, for the alleged violations must be submitted within thirty (30) calendar days from the date of this letter to the attention of Kim Davenport. This written notification could include, but not be limited to, photographs, receipts, or analytical results, documenting correction of violations. If you have any questions, please do not hesitate to contact me at (501) 682-0586 or davenport@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kim Davenport", is shown within a rectangular box.

Kim Davenport
Solid Waste Inspector
Office of Land Resources

Attachment

cc: Jarrod Zweifel P.G., Associate Director, Office of Land Resources



Arkansas Department of Environmental Quality
Office of Land Resources – Solid Waste Management
Class 1 Landfill Inspection



Site Name	BFI Waste Systems of Arkansas, LLC.- Class 1	County	Saline	AFIN	63-00155
Facility Address	18511 W. Sardis Road, Bauxite, AR 72011	Phone Number	870-946-5583 Heath 501-602-8440 Robert	Permit Number	0261-S1-R3
Permittee Address	18511 W. Sardis Road, Bauxite, AR 72011	E-Mail Address	Hlockley@republicservices.com	PDS #	108077
Date	5/16/2019	Entry Time	0840	Exit Time	1126

Regulation 22 – Operational Standards

Category 1

	Regulation	Item Description	Comments
	411(l)	Adequate employee facilities	
	421(a)(b)	Record keeping meets requirements specified by regulations	
	417	Access requirements	
	411(j)	Adequate provisions for backup equipment	
	421(d)	Waste receipt records, ticket system maintained	
	411(k)	Telephone system & written emergency response plan on site	
	423(b)	Annual compliance inspection by registered professional engineer	
	422	Facility implements operating plan and narrative	
	421(f)	Leachate disposal/recirculation records	
	421(g),701	Special waste disposal and procedures records	

Category 2

	Regulation	Item Description	Comments
	411(a)	Operations in accordance with permit documents	
	417(c)	Adequate all weather operational roads	
	411(c)	Smallest practical area, unloading supervised, single working face	
	411(e)	Salvage operations meet approved conditions	
	411(f)(1)	Scavenging of waste prohibited	
	411(p)	Proper wet weather repairs	
	411(b)	Operations by licensed on-site personnel at all times	
	411(d)	Waste spread and compacted as unloaded	
	411(g)	Litter control provisions maintained	Three (3) litter fences observed near the landfill working face, not previously observed. (Refer to Photos #2 & #3.) The operator, Robert Sanchez, stated the facility was in the process of litter cleanup measures to include relocating litter fences and adding culvert screens due to litter violations observed at the landfill on previous quarterly inspections.
	414(a)	Disease vectors controlled	

Category 2 (continued)


	Regulation	Item Description	Comments
	427	Surface Water Controls	
	411(h)(1)	Contouring prevents surface water flowing into or through waste	
	418(a)(b)	Run-on/off control system present and adequate	
	411(h)(2)	Surface water control prevents off-site sediment accumulation	
	411(i);427(f)	Adequate maintenance of intermediate/final cover vegetation	
	415	Gas monitoring program	An area of gas release (bubbling) observed at Cell 2, Zones 2 & 3. (Refer to Photo #8.) Refer to the Office of Air Quality.
X	411(o)	Leachate leaks or evidence of leachate seepage	Leachate observed in Cell 2, Zones 1 & 2, and entering storm water drain before emerging and pooling at Cell 2, Zones 3 & 4. (Refer to Photos #5 - #8.)
	426	Survey controls	
	429	Leachate collection system	
	420	Liquid Restrictions	

Category 3

	Regulation	Item Description	Comments
	412	Implementation of hazardous/unauthorized waste exclusion plan	
	413(a)(b)	Satisfactory daily/alternative cover	
	413(c)	Satisfactory intermediate cover	
	416(b),411(f)(4)	Open burning prohibited	
	419	Cause discharge/leachate discharge leaving landfill	
	411(f)(3),419(a)(4)	Depositing waste in standing water prohibited	
	411(o)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/Off lined area	

Regulation 22 - Records

421(a)(8), 1203(k)	Date of last groundwater monitoring report		3/26/2019		Site Conditions		Dry					
423(b)	Date of last engineering report		3/28/2019		Weather Conditions		Sunny					
428	Liner construction in progress	Yes/No	No	Notice of liner construction		Yes/No	No	Third party CQA on-site during construction		Yes/No	N/A	
412(a)	Date of last random inspection for unauthorized waste			5/1/2019		Total # for month		2-May				
415, 421(e)	Date of last quarterly methane monitoring			3/19/2019		Detection level		>100	415(a)	Explosive gas records current?	Yes/No	Yes
421(g),412(a)(2),701	Date of last special waste received			5/16/2019		Disposal location		Cell 2 active area				
421(d)	Previous quarter waste received			42,155.88		Tons						
427(c)	Surface water DMR records current?			Yes/No		Nov 2016						

Fayetteville Shale Related	Yes/No	Yes	Out of Compliance with Fayetteville Shale			Yes/No	No				
Operator Name & Number	Spencer Robbins-003765					Signature of Inspector					
Exit Interview Conducted with	Robert Sanchez			Method	In-person		Date	5/16/2019		Time	1100

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	BFI Waste Systems of Arkansas, LLC			Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>	Witness	Robert Sanchez, Operator		
Photo #	1	Of	8	Date	5/16/2019	Time	0855
Description	Northeast view of the convenience area with new signage and litter fencing observed.						



Location	BFI Waste Systems of Arkansas, LLC			Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>	Witness	Robert Sanchez, Operator		
Photo #	2	Of	8	Date	5/16/2019	Time	0913
Description	Northeast slope of the landfill with litter fence and berm observed.						



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Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>	Witness	Robert Sanchez, Operator		
Photo #	3	Of	8	Date	5/16/2019	Time	0929
Description	Northeast view of the primary and secondary litter fencing observed near the working face.						



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Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>	Witness	Robert Sanchez, Operator		
Photo #	4	Of	8	Date	5/16/2019	Time	0938
Description	Southern view of the working face in Cell 2.						



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Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>		Witness	Robert Sanchez, Operator		
Photo #	5	Of	8		Date	5/16/2019	Time	0955
Description	Leachate leak observed at Cell 2, Zones 1 & 2.							



Location	BFI Waste Systems of Arkansas, LLC				Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>		Witness	Robert Sanchez, Operator		
Photo #	6	Of	8		Date	5/16/2019	Time	0954
Description	Leachate shown in Photo #5 observed entering the storm drain culvert.							



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Official Photograph Sheet

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Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>	Witness	Robert Sanchez, Operator		
Photo #	7	Of	8	Date	5/16/2019	Time	0955
Description	Leachate shown in Photos #5 & #6 emerges from the storm drain culvert in Cell 2, Zones 3 & 4, and pools in this area.						



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Photographer	Kim Davenport, ADEQ Solid Waste Inspector		<i>KD</i>	Witness	Robert Sanchez, Operator		
Photo #	8	Of	8	Date	5/16/2019	Time	0955
Description	This screen shot is taken from a short video to show bubbling and pooling leachate observed in Cell 2, Zones 2 & 3.						



Hayden, Ryan

From: Davenport, Kimberly
Sent: Tuesday, July 02, 2019 7:08 AM
To: Hayden, Ryan
Subject: FW: ADEQ QTR 5/16 inspection actions.
Attachments: file-19.jpeg

Response to 2nd quarter inspection

From: Sanchez, Robert [<mailto:RSanchez2@republicservices.com>]
Sent: Monday, July 01, 2019 7:16 PM
To: Davenport, Kimberly
Cc: Robbins, Spencer D
Subject: ADEQ QTR 5/16 inspection actions.

Good eveninin Kim,
We have made repairs to seep, gas collection system and continue to monitor for seeps and bubbling. We continue to pick litter continiously and continue to take measures to prevent uncontrolled windblown liter. If any questions or concerns please let me know.



Thanks....
Robert E. Sanchez
Operations Supervisor

18511 W Sardis RD
72011

[e rsanchez2@republicservices.com](mailto:rsanchez2@republicservices.com)

[o 501-569-3790](tel:501-569-3790) [c 501-602-8440](tel:501-602-8440)

[w RepublicServices.com](http://RepublicServices.com)



We'll handle it from here.*



