

September 5, 2019

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

RE: Quarterly Inspection conducted on August 1, 2019
AFIN 63-00155
Permit Number 0261-S1-R3

Dear Mr. Lockley:

The Arkansas Division of Environmental Quality (DEQ) Office of Land Resources 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 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 davenport@adeq.state.ar.us.

Sincerely,



Kim Davenport
Solid Waste Inspector
Office of Land Resources

Enclosure

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

Arkansas Division of Environmental Quality

Office of Land Resources – Solid Waste Management

Class 1 Landfill Inspection



Site Name	BFI Waste Systems of Arkansas, LLC.	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 #	109219
Date	8/1/2019	Entry Time	1001	Exit Time	1143

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	
X	411(g)	Litter control provisions maintained	Litter observed on top of Cells 2, 3, & 5 and in the drainage ditch leading to the sedimentation pond. (Refer to Photos #1, #2 & #5.)
	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	
X	418(a)(b)	Run-on/off control system present and adequate	No run-off controls observed in place at the working face on the slope of Cell 2, Zone 2, to prevent surface water from running through waste and entering storm water ditches. (Refer to Photo #3.)
	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	
	411(o)	Leachate leaks or evidence of leachate seepage	
	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	
X	411(o)	Erosion or other cover defects resulting in exposed refuse	Exposed waste observed in the interim cover of Cell 4. (Refer to Photo #4.)
	309(c)	Overfill/Off lined area	

Regulation 22 - Records

421(a)(8), 1203(k)	Date of last groundwater monitoring report	6/18/2019	Site Conditions	Dry		
423(b)	Date of last engineering report	3/28/2019	Weather Conditions	Overcast		
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	7/31/2019	Total # for month	5		
415, 421(e)	Date of last quarterly methane monitoring	7/31/2019	Detection level		415(a)	Explosive gas records current? Yes/No Yes
421(g),412(a)(2),701	Date of last special waste received	8/1/2019	Disposal location	Cell 2, Zone 2		
421(d)	Previous quarter waste received	49,910	Tons			
427(c)	Surface water DMR records current?	Yes/No				
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	8/1/2019
					Time	1120

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	BFI Waste Systems of Arkansas, LLC				Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector				Witness	Annette Cusher, ADEQ Engineer Supervisor		
Photo #	1	Of	5		Date	8/1/2019	Time	1046
Description	Northeast view of litter on the slope of Cell 5.							
								
Location	BFI Waste Systems of Arkansas, LLC				Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector				Witness	Annette Cusher, ADEQ Engineer Supervisor		
Photo #	2	Of	5		Date	8/1/2019	Time	1118
Description	Litter observed in the drainage ditch leading to sedimentation pond.							
								

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	BFI Waste Systems of Arkansas, LLC				Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector				Witness	Annette Cusher, ADEQ Engineer Supervisor		
Photo #	3	Of	5		Date	8/1/2019	Time	1057
Description	Working face on the slope of Cell 2 with no run-off controls observed.							
								
Location	BFI Waste Systems of Arkansas, LLC				Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector				Witness	Annette Cusher, ADEQ Engineer Supervisor		
Photo #	4	Of	5		Date	8/1/2019	Time	1047
Description	Exposed waste observed in the interim cover of Cell 4.							
								

Arkansas Division of Environmental Quality Official Photograph Sheet

Location	BFI Waste Systems of Arkansas, LLC				Permit	0261-S1-R3	AFIN	63-00155
Photographer	Kim Davenport, ADEQ Solid Waste Inspector				Witness	Annette Cusher, ADEQ Engineer Supervisor		
Photo #	5	Of	5		Date		Time	
Description	Litter observed on top of Cells 2 & 3.							
<div style="display: flex; align-items: center; justify-content: center;">  </div>								

Blue, Karen

To: Davenport, Kimberly
Subject: RE: Reply for quarterly inspection performed 8/1/2019

From: Sanchez, Robert [<mailto:RSanchez2@republicservices.com>]
Sent: Saturday, September 14, 2019 1:54 PM
To: Davenport, Kimberly
Subject: Reply for quarterly inspection performed 8/1/2019

Good afternoon Kim,

A horseshoe berm is now being used when fill is on slopes. Flagging has been and continue to be picked up at the top deck and more interim cover has been placed on area of cell 4. More cover is being added to all north slopes and storm water berms rebuild. Ditches are being weed and picked. Class 4 has been mowed.

Please let me know if you have any questions.
Thank you.

Roberto E. Sanchez
Operations Supervisor

18511 W Sardis RD
72011
e rsanchez2@republicservices.com
o 501-569-3790 c 501-602-8440
w RepublicServices.com

Rec'd Digitally	
AFIN: <u>63-00155</u>	S W M D
PMT#: <u>0261-S1-R3</u>	
<div style="border: 1px solid black; padding: 2px; text-align: center;">RECEIVED <small>By Karen Blue at 7:50 am, Sep 16, 2019</small></div>	
DOC ID#: <u>77020</u>	
TO: <u>RH>FILE <KMB</u>	



We'll handle it from here.®
