

# ARKANSAS

## ENERGY & ENVIRONMENT

## ENVIRONMENTAL QUALITY

December 12, 2019

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

**RE: Quarterly Inspection conducted on December 4, 2019**  
**AFIN 63-00155**  
**Permit Number 0261-S1-R3**

Dear Mr. Lockley:

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 [davenport@adeq.state.ar.us](mailto: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

**Division of Environmental Quality**  
**Office of Land Resources - Solid Waste Management**  
**Class 1 Landfill Inspection**



<b>Site Name</b>	BFI Waste Systems of Arkansas, LLC.	<b>County</b>	Saline	<b>AFIN</b>	63-00155
<b>Facility Address</b>	18511 W. Sardis Road, Bauxite, AR 72011	<b>Phone Number</b>	870-946-5583 Heath 501-602-8440 Robert	<b>Permit Number</b>	0261-S1-R3
<b>Permittee Address</b>	18511 W. Sardis Road, Bauxite, AR 72011	<b>E-Mail Address</b>	hlockley@republicservices.com	<b>PDS #</b>	110356
<b>Date</b>	12/4/2019	<b>Entry Time</b>	1030	<b>Exit Time</b>	1150

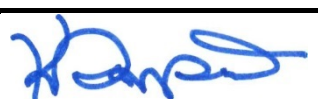
**Regulation 22 – Operational Standards**

**Category 1**

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
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**

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
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	Litter still observed along the north slope and in the sediment pond. However, litter fencing has been installed and relocated to increase the effectiveness. Workers were actively picking up litter from the bank of the pond during the inspection.
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												
X 411(o)	Leachate leaks or evidence of leachate seepage				Leachate observed pooling near the sawdust pile at the bulking pit. Leachate also observed near the Cell 4/Cell 5 junction. (Refer to Photos #1 - #3.)								
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 at Cell 3 and along the southern slope where waste was dug out for a gas repair but has not yet been re-incorporated into the current working face. (Refer to Photos #4 - #9.)								
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			Wet					
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			12/5/2019	Total # for month			3 Nov					
415, 421(e)	Date of last quarterly methane monitoring			8/26/2019	Detection level			>100	415(a)	Explosive gas records current?	Yes/No	Yes	
421(g),412(a)(2),701	Date of last special waste received			12/4/2019	Disposal location								
421(d)	Previous quarter waste received			43,464	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	Via Phone			Date	12/6/2019		Time	1032	

# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155	
<b>Photographer</b>	Kim Davenport, Inspector			<i>KD</i>	<b>Witness</b>	N/A			
<b>Photo #</b>	1	<b>Of</b>	10		<b>Date</b>	12/4/2019		<b>Time</b>	1140
<b>Description</b>	Leachate observed pooling near the sawdust pile at the bulking pit. Solid waste (red arrows) visible in the pool.								



<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155	
<b>Photographer</b>	Kim Davenport, Inspector			<i>KD</i>	<b>Witness</b>	N/A			
<b>Photo #</b>	2	<b>Of</b>	10		<b>Date</b>	12/4/2019		<b>Time</b>	1140
<b>Description</b>	Another view of the leachate shown in Photo #1. The bulking pit is located in the background.								





# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3		<b>AFIN</b>	63-00155		
<b>Photographer</b>	Kim Davenport, Inspector				<i>KD</i>	<b>Witness</b>	N/A				
<b>Photo #</b>	3	<b>Of</b>	10		<b>Date</b>	12/4/2019		<b>Time</b>	1133		
<b>Description</b>	Leachate seep observed at Cell 4, near the Cell4/Cell 5 junction.										
											
<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3		<b>AFIN</b>	63-00155		
<b>Photographer</b>	Kim Davenport, Inspector				<i>KD</i>	<b>Witness</b>	N/A				
<b>Photo #</b>	4	<b>Of</b>	10		<b>Date</b>	12/4/2019		<b>Time</b>	1109		
<b>Description</b>	Exposed waste observed at Cell 3.										
											



# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector			<i>KD</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	5	<b>Of</b>	10		<b>Date</b>	12/4/2019	<b>Time</b>	1110
<b>Description</b>	Exposed waste observed at Cell 3.							



<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector			<i>KD</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	6	<b>Of</b>	10		<b>Date</b>	12/4/2019	<b>Time</b>	1112
<b>Description</b>	Exposed waste observed at Cell 3.							





# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector			<i>KD</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	7	<b>Of</b>	10		<b>Date</b>	12/4/2019	<b>Time</b>	1112
<b>Description</b>	Exposed waste observed at Cell 3.							



<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector			<i>KD</i>	<b>Witness</b>	N/A		
<b>Photo #</b>	8	<b>Of</b>	10		<b>Date</b>	12/4/2019	<b>Time</b>	1144
<b>Description</b>	Exposed waste observed along the southern slope of the landfill at a gas repair site.							





# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector		<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	9	<b>Of</b>	10		<b>Date</b>	12/4/2019	<b>Time</b>	1143
<b>Description</b>	Exposed waste observed along the southern slope of the landfill at a gas repair site.							



<b>Location</b>	BFI Waste Systems of Arkansas, LLC				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector		<i>KD</i>		<b>Witness</b>	N/A		
<b>Photo #</b>	10	<b>Of</b>	10		<b>Date</b>	12/4/2019	<b>Time</b>	1122
<b>Description</b>	View of the working face observed at Cell 4.							

