



## ARKANSAS

ENERGY & ENVIRONMENT

12/28/2021

Mr. Robert Sanchez  
BFI Waste Systems of Arkansas  
18511 W. Sardis Road  
Bauxite, AR 72011

**RE: Inspection conducted on December 13, 2021**  
**AFIN 63-00155**  
**Permit Number 0261-S1-R3**

Dear Mr. Sanchez,

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 [davenportk@adeq.state.ar.us](mailto:davenportk@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  
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Scott McWilliams, Senior Compliance Manager, Regulated Waste Operations



## ARKANSAS

ENERGY & ENVIRONMENT

12/28/2021

Mr. Brad Zimmerman  
BFI Waste Systems of Arkansas  
5605 Moreau River Access Road  
Jefferson City, MO 65101

**RE: Inspection conducted on December 13, 2021**  
**AFIN 63-00155**  
**Permit Number 0261-S1-R3**

Dear Mr. Zimmerman,

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.

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

Kim Davenport  
Solid Waste Inspector  
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Scott McWilliams, Senior Compliance Manager, Regulated Waste Operations



**ARKANSAS**  
ENERGY & ENVIRONMENT

**Office of Land Resources**  
**Regulated Waste Operations**  
**Class 1 Landfill Inspection Form**

<b>Site Name</b>	BFI Waste Systems of Arkansas	<b>County</b>	Saline	<b>AFIN</b>	63-00155
<b>Facility Address</b>	18511 W Sardis Road, Bauxite, AR	<b>Phone #</b>	901-873-8334 (Brad Zimmerman) 501-602-8440 (Robert Sanchez)	<b>Permit #</b>	0261-S1-R3
<b>Permittee Address</b>	18511 W Sardis Road, Bauxite, AR	<b>Email Address</b>	<a href="mailto:Bzimmerman2@republicservices.com">Bzimmerman2@republicservices.com</a> <a href="mailto:RSanchez2@republicservices.com">RSanchez2@republicservices.com</a>	<b>PDS #</b>	118596
<b>Date</b>	12/13/2021	<b>Entry Time</b>	1300	<b>Exit Time</b>	1515

**Operational Standards**

**Category 1**


	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	417	Access Requirements	
	411(j)	Adequate Provision for Backup Equipment	
	423(b)	Annual Compliance Inspection by Registered Engineer	

**Category 2**





	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	411(a)	Operations in Accordance with Permit Documents	
	411(c)	Smallest Practical Area, Unloading Supervised, Single Working Face	
	411(b)	Operations by Licensed On-site Personnel at All Times	
	411(g)	Litter Control Provisions Maintained	
	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)	Adequate Maintenance of Intermediate/Final Cover Vegetation	Cells 1-5, now under interim cover, as referenced in Doc #79863, have historically been unable to grow vegetation due to acidic soils. (Refer to Doc #76882.) New test areas have succeeded in growing vegetation (Refer to Photos #1 - #3); however, excluding the small test areas, all of Cells 1-5 remain un-vegetated and unable to hold a soil cover. (Refer to Photos #2 & #4 - #6.)
	415	Gas Monitoring Program	
	411(o)	Leachate Leaks or Evidence of Leachate Seepage	
	429	Leachate Collection System	

**Category 3**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
X	413(c)	Satisfactory Intermediate Cover	Exposed waste observed at Cells 1-5. (Refer to Photos #2 & 4 - #6.)
	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
	411(f)(3)	Depositing Waste in Standing Water Prohibited	
	411(o)	Erosion or Other Cover Defects Resulting in Exposed Refuse	

	309(c)	Overfill/Off Lined Area				
Records						
Date of Last Annual Report		3/31/2021	Date of Last Quarterly Methane Monitoring		8/30/2021	
Date of Last Groundwater Monitoring Report		12/15/2021	Previous Quarter Waste Received		76,814.43 Tons	
Operator Name & Number		Darrel Wessell- 002923	Signature of Inspector			
Exit Interview Conducted with		Robert Sanchez	Method	On-site	Date	12/13/2021
					Time	1445

# Division of Environmental Quality Official Photograph Sheet


<b>Location</b>	BFI Waste Systems of Arkansas				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	6		<b>Date</b>	12/13/2021	<b>Time</b>	1354
<b>Description</b>	Test area at Cell 2 south is observed, looking south.							
								
<b>Location</b>	BFI Waste Systems of Arkansas				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	6		<b>Date</b>	12/13/2021	<b>Time</b>	1355
<b>Description</b>	Test area at Cell 2 north is observed, looking north. Exposed waste is observed across the top of Cell 4.							
								




# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas				<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>	6		<b>Date</b>	12/13/2021		<b>Time</b>	1403	
<b>Description</b>	An overview of the test area at cell 2 north is observed, looking northwest.									
										
<b>Location</b>	BFI Waste Systems of Arkansas				<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>	6		<b>Date</b>	12/13/2021		<b>Time</b>	1406	
<b>Description</b>	Exposed waste is observed at the lower portion of the test area at Cell 2 north.									
										

# Division of Environmental Quality Official Photograph Sheet

<b>Location</b>	BFI Waste Systems of Arkansas				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	5	<b>Of</b>	6		<b>Date</b>	12/13/2021	<b>Time</b>	1415
<b>Description</b>	An example is shown of exposed waste in the interim cover across the top of Cells 3-5, looking west.							



<b>Location</b>	BFI Waste Systems of Arkansas				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	6	<b>Of</b>	6		<b>Date</b>	12/13/2021	<b>Time</b>	1417
<b>Description</b>	An example is shown of exposed waste across the top of Cell 4, looking south.							

