



## ARKANSAS

ENERGY & ENVIRONMENT

3/22/2022

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

**RE: Inspection conducted on March 16, 2022**  
**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

3/22/2022

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

**RE: Inspection conducted on March 16, 2022**  
**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>	119513
<b>Date</b>	3/16/2022	<b>Entry Time</b>	1330	<b>Exit Time</b>	1530

**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 & #2.) Excluding the test areas, the upper portion of Cells 1-5 remain un-vegetated and unable to hold a soil cover. (Refer to Photos #3- #5.)
	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>
	413(a)(b)(c)	Satisfactory Daily/Alternate/Intermediate Cover	
	419(a)(5)	Cause Discharge/Leachate Leaving Landfill	
	411(f)(3)	Depositing Waste in Standing Water Prohibited	
X	411(o)	Erosion or Other Cover Defects Resulting in Exposed Refuse	Erosion with exposed waste observed on the south slope. (Refer to Photos #3 - #5.) Cover defects resulting in exposed waste observed across the upper deck of Cells 1-5. (Refer to Photos #1 -#5.)

	309(c)	Overfill/Off Lined Area				
Records						
Date of Last Annual Report		3/31/2021		Date of Last Quarterly Methane Monitoring		12/2/2021
Date of Last Groundwater Monitoring Report		2/28/2022		Previous Quarter Waste Received		81208.58 Tons
Operator Name & Number		Darrel Wessell- 002923		Signature of Inspector		
Exit Interview Conducted with		Robert Sanchez		Method	On-site	Date
						3/16/2022
					Time	1500

# 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, DEQ Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	5		<b>Date</b>	3/16/2022	<b>Time</b>	1426
<b>Description</b>	An example of exposed waste observed across the top deck of the landfill. Vegetative growth at test area in Cell 2 observed in the foreground.							
								
<b>Location</b>	BFI Waste Systems of Arkansas				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, DEQ Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	5		<b>Date</b>	3/16/2022	<b>Time</b>	1426
<b>Description</b>	An overview of the area (Cells #2 & #4) shown in Photo #1 is observed.							
								

# **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, DEQ Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	3	<b>Of</b>	5		<b>Date</b>	3/16/2022	<b>Time</b>	1409

<b>Description</b>	Erosion with exposed waste observed on the south slope of Cell #2.							
								

<b>Location</b>	BFI Waste Systems of Arkansas				<b>Permit</b>	0261-S1-R3	<b>AFIN</b>	63-00155
<b>Photographer</b>	Kim Davenport, DEQ Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	4	<b>Of</b>	5		<b>Date</b>	3/16/2022	<b>Time</b>	1408

<b>Description</b>	Erosion with exposed waste observed on the south slope of Cell #2.							
								

## 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, DEQ Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	5	<b>Of</b>	5		<b>Date</b>	3/16/2022	<b>Time</b>	1408
<b>Description</b>	An overview of the area shown in Photo #4 to show extent of erosion, cover defects, and lack of vegetative cover.							
