ADEQ
ARKANSAS
Department of Environmental Quality

September 8, 2015

Charles Gillian,
Waste Management of Arkansas
100 Two Pine Drive
North Little Rock, AR 72117

RE: Eco-Vista Landfill Inspection
AFIN: 72-00144 Permit No.: ARG160045

Dear Mr. Gillian:

On August 26, 2015, Alison West, District 1 Field Inspector, and I performed a Compliance Evaluation Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **September 18, 2015.**

If I can be of any assistance, please contact me at holden@adeq.state.ar.us or 479-267-0811, ext. 16.

Sincerely,

Matt Holden
District 1 Field Inspector
Water Division

ADEQ
ARKANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: **72-00144** | PERMIT #: **ARG160045** | DATE: **8/26/2015**

COUNTY: **72 Washington** | PDS #: | MEDIA: **WN**

GPS LAT: **36.131724** LONG: **-94.252428** LOCATION: **General Area**

FACILITY INFORMATION

NAME:
Eco-Vista Landfill
LOCATION:
2210 Waste Management Drive
CITY:
Springdale, AR 72762

RESPONSIBLE OFFICIAL

NAME: / TITLE
Charles Gillian /
COMPANY:
Waste Management of Arkansas
MAILING ADDRESS:
100 Two Pine Drive
CITY, STATE, ZIP:
North Little Rock AR 72117
PHONE & EXT: / FAX:
479-361-2069 /
EMAIL:
cgillian@wm.com

CONTACTED DURING INSPECTION: **Yes**

INSPECTION INFORMATION

FACILITY TYPE: **2 - Industrial**
INSPECTOR ID#: **102078 S - State**
FACILITY EVALUATION RATING: **1 - Unsatisfactory**
INSPECTION TYPE: **Compliance Evaluation**
DATE(S): **8/26/2015**
ENTRY TIME: **10:40**
EXIT TIME: **12:00**
PERMIT EFFECTIVE DATE: **3/1/2015**
PERMIT EXPIRATION DATE: **2/29/2020**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Matt Holden/District 1 Field Inspector/479-267-0811, ext. 16/holden@adeq.state.ar.us
Alison West/District 1 Field Inspector/479-267-0811, ext. 12/west@adeq.state.ar.us
Steve Peck, Gas Plant Manager
David Phillips, Facility Manager

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

The following violations were observed at the time of inspection:

1. Trees and shrubs were observed growing along the levees and inside the sedimentation ponds, which could impair the integrity of the ponds. This is in violation of Part 4.1 of your permit.

2. Lab Analyses from samples taken from Outfall 001A on June 22, 2015 indicate that the facility was unable to meet the holding time for pH as required by 40 CFR Part 136 (Attachment 1). This is in violation of Part 5.3 of your permit.

3. The Chain of Custody (COC) for samples taken from Outfall 001A on June 22, 2015 did not include preservatives used, type of sample (grab or composite), container type, sample matrix, or analyses requested (Attachment 2). This is in violation of Part 5.8 of your permit.

On August 27, 2015, I requested details on how the facility monitors instantaneous flow in the event of a discharge. To this date, I have not received a response from the facility. In addition to the above items, please provide detailed information on how the facility monitors instantaneous flow from both Outfall 001A and Outfall 003A. Please include flow measurement device calibration records in your response.

PDS #086374

GENERAL COMMENTS	
On August 26, 2015, Alison West, District 1 Field Inspector, and I conducted a compliance evaluation inspection of the above referenced facility. Upon arrival at the facility, we met with Steve Peck, Gas Plant Manager, for a tour of the facility. We observed both sedimentation ponds. Trees and shrubs were observed growing along the levees and inside the sedimentation ponds. Mr. Peck stated the levees are mowed once a year. No flow monitoring device was observed at either Outfall 001A or Outfall 003A during the inspection. Please see Attachment 3 for aerial view of Outfall 001A and Outfall 003A.	
INSPECTOR'S SIGNATURE: **Matt Holden**	DATE: **09/04/2015**
SUPERVISOR'S SIGNATURE: **Jason Bolenbaugh**	DATE: **9/4/2015**

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐Y ☐N ☑NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **Chain of Custody did not include preservative used, type of sample (grab or composite), container type, sample matrix, or analyses requested.**	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☑S ☐M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y ☐N ☐NA ☐NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y ☐N ☐NA ☐NE
e. RESULTS OF CALIBRATIONS:	☑Y ☐N ☐NA ☐NE
f. RESULTS OF ANALYSES:	☑Y ☐N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y ☐N ☐NA ☐NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y ☐N ☐NA ☐NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☐S ☐M ☐U ☐NA ☑NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☐S ☐M ☐U ☐NA ☑NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☐Y ☐N ☐NA ☑NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☐S ☑M ☐U ☐NA ☐NE
DETAILS: **Trees and shrubs observed growing along levees and in sedimentation ponds.**	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☐S ☐M ☑U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☐S ☐M ☐U ☐NA ☑NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☐S ☐M ☐U ☐NA ☑NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☐Y ☐N ☐NA ☑NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☐Y ☐N ☐NA ☑NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☐Y ☐N ☐NA ☑NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	☐Y ☑N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☐Y ☐N ☑NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☐Y ☐N ☑NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☐Y ☑N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	☐Y ☐N ☑NA ☐NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☐S ☐M ☑U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☐Y ☐N ☑NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☐Y ☑N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☐Y ☐N ☑NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☐Y ☐N ☐NA ☑NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☐Y ☑N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☐S ☐M ☑U ☐NA ☐NE
DETAILS: **Facility does not appear to have a primary or secondary flow measurement device. Additional information has been requested in the response.**	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:__ TYPE OF DEVICE:	☐Y ☐N ☐NA ☑NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☐Y ☐N ☐NA ☑NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☐Y ☐N ☐NA ☑NE
4. CALIBRATION FREQUENCY ADEQUATE:	☐Y ☐N ☐NA ☑NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☐Y ☐N ☐NA ☑NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☐Y ☐N ☐NA ☑NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☐Y ☐N ☐NA ☑NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☐Y ☐N ☐NA ☑NE
9. HEAD MEASURED AT PROPER LOCATION:	☐Y ☐N ☐NA ☑NE

SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☐Y ☐N ☐NA ☑NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐Y ☐N ☑NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	☑Y ☐N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: **American Interplex**	
b. LAB ADDRESS: **8600 Kanis Road, Little Rock, AR 72204**	
c. PARAMETERS PERFORMED: **COD, TSS, pH, Oil & Grease**	
8. BIOMONITORING PROCEDURES ADEQUATE:	☐Y ☐N ☑NA ☐NE
a. PROPER ORGANISMS USED:	☐Y ☐N ☑NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:	☐Y ☐N ☑NA ☐NE
c. PROPER TEST METHODS AND DURATION:	☐Y ☐N ☑NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☑NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☐S ☐M ☐U ☐NA ☑NE

DETAILS: **No Discharge at time of inspection**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001							--

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☐S ☐M ☐U ☐NA ☑NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☐S ☐M ☐U ☐NA ☑NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☐N ☑NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☐NA ☑NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☐NA ☑NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☐NA ☑NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☐NA ☑NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☐NA ☑NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☐NA ☑NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☐NA ☑NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☐NA ☑NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☐NA ☑NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☐NA ☑NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☐NA ☑NE

FLOW CALCULATION SHEET

No Discharge at time of inspection.

Date: _____ Time: _____

Head in Inches: _____ Feet: _____

Type & Size of Primary Flow Measurement Device:

Name & Model of Secondary Flow Measurement Device:

Date of last Calibration of Secondary Flow Device:

Recorded Flow at Date & Time Listed Above: _____ (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: _____

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{\quad - \quad}{\quad} \times 100$$

$$\% \text{ Error} = \frac{\quad}{\quad} \times 100$$

% Error = _____ X 100

% Error = _____ %

Comments:

DMR Calculation Check

Reporting Period:	**From**	**2015** (Year)	**06** (Month)	**01** (Day)	**To**	**2015** (Year)	**06** (Month)	**30** (Day)

Parameter Checked: TSS

	Loading Mass	Concentration Monthly	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	NA	32	32
Calculated Value:	NA	32	32
Permit Value:	NA	100	100

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	**From**	**2015** (Year)	**06** (Month)	**01** (Day)	**To**	**2015** (Year)	**06** (Month)	**30** (Day)

Parameter Checked: COD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	NA	56	56
Calculated Value:	NA	56	56
Permit Value:	NA	75	75

If calculated value does not equal reported value, explain:

Water Division Photographic Evidence Sheet					
Location:	**Eco-Vista Landfill**				
Photographer:	**Matt Holden**	Date:	**08/26/2015**	Time:	**11:09**
Witness:	**Alison West**			Photo #:	**1**
Description:	**DSCN0320. Sedimentation pond 001A (west pond). Note trees and shrubs growing on levee and in pond.**				

Photographer:	**Matt Holden**	Date:	**08/26/2015**	Time:	**11:10**
Witness:	**Alison West**			Photo #:	**2**
Description:	**DSCN0322. Outfall 001A.**				

Water Division Photographic Evidence Sheet					
Location:	**Eco-Vista Landfill**				
Photographer:	**Matt Holden**	Date:	**08/26/2015**	Time:	**11:16**
Witness:	**Alison West**			Photo #:	**3**
Description:	**DSCN0325. Sedimentation pond 003A (east pond). Note trees and shrubs growing on levee and in pond.**				

Photographer:	**Matt Holden**	Date:	**08/26/2015**	Time:	**11:16**
Witness:	**Alison West**			Photo #:	**4**
Description:	**DSCN0326. Sedimentation pond 003A (east pond). Note trees and shrubs growing on levee and in pond.**				

Water Division Photographic Evidence Sheet					
Location:	**Eco-Vista Landfill**				
Photographer:	**Matt Holden**	Date:	**08/26/2015**	Time:	**11:17**
Witness:	**Alison West**			Photo #:	**5**
Description:	**DSCN0328. Outfall 003A.**				

AMERICAN INTERPLEX CORPORATION LABORATORIES

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Waste Management Eco-Vista, LLC
2210 Waste Management Drive
Springdale, AR 72762

SAMPLE INFORMATION

Project Description:
One (1) water sample(s) received on June 23, 2015
ECO-VISTA
P.O. No. 500870284832

Receipt Details:
A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

Laboratory ID	Client Sample ID	Sampled Date/Time	Notes
191722-1	SB-1	22-Jun-2015 0800	

Qualifiers:
H Analytical holding time exceeded regulatory requirements

Case Narrative:
Table II of 40 CFR Part 136.3 indicates analysis of pH, Total Residual Chlorine, and Dissolved Oxygen are to be performed on site or immediately after collection. American Interplex Corporation analyzes these parameters as soon as possible after laboratory receipt.

References:
"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", (SM).
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).

8600 Kanis Road • Little Rock, AR 72204 www.AmericanInterplex.com Phone 501-224-5060 • FAX 501-224-5072

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Waste Management Eco-Vista, LLC
2210 Waste Management Drive
Springdale, AR 72762

ANALYTICAL RESULTS

AIC No. 191722-1
Sample Identification: SB-1 22-Jun-2015 0800

Analyte		Result	RL	Units	Qualifier
COD		56	10	mg/l	
HACH 8000	Prep: 26-Jun-2015 0922 by 271	Analyzed: 26-Jun-2015 1150 by 271		Batch: W52389	
pH		7.4		Units	H
SM 4500-H+ B 2000		Analyzed: 23-Jun-2015 1729 by 93		Batch: W52357	
Total Suspended Solids		32	4	mg/l	
USGS 3765	Prep: 24-Jun-2015 0958 by 100	Analyzed: 24-Jun-2015 1328 by 100		Batch: W52361	
Oil and Grease		< 5	5	mg/l	
EPA 1664A	Prep: 25-Jun-2015 1456 by 301	Analyzed: 25-Jun-2015 1621 by 301		Batch: B9572	

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Waste Management Eco-Vista, LLC
2210 Waste Management Drive
Springdale, AR 72762

DUPLICATE RESULTS

Analyte		AIC No.	Result	RPD	RPD Limit	Preparation Date	Analysis Date	Dil	Qual
pH		191722-1	7.4 Units				23Jun15 1729 by 93		H
	Batch: W52357	Duplicate	7.4 Units	0.135	5.00		23Jun15 1730 by 93		H
Total Suspended Solids		191731-1	63 mg/l			24Jun15 0958 by 100	24Jun15 1328 by 100		
	Batch: W52361	Duplicate	62 mg/l	1.07	20.0	24Jun15 0959 by 100	24Jun15 1328 by 100		
Total Suspended Solids		191733-1	27 mg/l			24Jun15 0958 by 100	24Jun15 1328 by 100		
	Batch: W52361	Duplicate	27 mg/l	1.48	20.0	24Jun15 0959 by 100	24Jun15 1328 by 100		

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	100 mg/l	101	85.0-115			W52389	26Jun15 0922 by 271	26Jun15 1150 by 271		
pH	-	99.7	98.0-102			W52357		23Jun15 1730 by 93		
Oil and Grease	40 mg/l	96.5	78.0-114			B9572	25Jun15 1456 by 301	25Jun15 1621 by 301		
	40 mg/l	98.5	78.0-114	2.05	20.0	B9572	25Jun15 1456 by 301	25Jun15 1621 by 301		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	191700-1	100 mg/l	103	80.0-120	W52389	26Jun15 0922 by 271	26Jun15 1150 by 271		
	191700-1	100 mg/l	106	80.0-120	W52389	26Jun15 0922 by 271	26Jun15 1150 by 271		
	Relative Percent Difference:		2.87	10.0	W52389				

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
COD	< 10 mg/l	10	10	W52389-1	26Jun15 0922 by 271	26Jun15 1150 by 271	
Total Suspended Solids	< 4 mg/l	4	4	W52361-1	24Jun15 0959 by 100	24Jun15 1328 by 100	
Oil and Grease	< 2 mg/l	2	5	B9572-1	25Jun15 1456 by 301	25Jun15 1621 by 301	

8600 Kanis Road • Little Rock, AR 72204 www.AmericanInterplex.com Phone 501-224-5060 • FAX 501-224-5072

AMERICAN INTERPLEX CORPORATION LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE OF

Client: WASTE MANAGEMENT ECO-VISTA LANDFILL
Project Reference: ECO-VISTA
Project Manager: DAVID PHILLIPS
Sampled By: DAVID PHILLIPS

PO No.

SAMPLE MATRIX: WATER, SOIL

ANALYSES REQUESTED[1]

AIC CONTROL NO: 191722
AIC PROPOSAL NO:
Carrier/Tracking No. UPS
Received Temperature C 78° (F) 0.1

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL	NO OF BOTTLES
1	SB-1 SOUTH BASIN	6.22.15 8:00 AM					3
		Container Type					
		Preservative					

Remarks: Analyses per sample label TD285 23000 15

Field pH calibration on 6.85 @ ____ Buffer:

G = Glass, P = Plastic, V = VOA vials, H = HCl to pH2, T = Sodium Thiosulfate
NO = none, S = Sulfuric acid pH2, N = Nitric acid pH2, B = NaOH to pH12, Z = Zinc acetate

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: _____ Fax: _____
Report Attention to:
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
DAVID PHILLIPS	6.22.15 8:00 AM	DAVID PHILLIPS 8:00AM	→
Relinquished By:	Date/Time	Received in Lab By:	Date/Time

Comments: COPY TO JODI TAYLOR (jtaylo28@wm.com) & DAVID PHILLIPS (dphill92@wm.com)

19-Oct-09 FORM 0060

UPS # 1Z A8W428019467 6020

Attachment 3: Aerial View of Outfall 001 and Outfall 003 (red line indicates drainage).

From:	Taylor, Jodi
To:	Water-Inspection-Report; Holden, Matthew
Cc:	Phillips, David; Murray Sr, Tim
Subject:	Stormwater Inspection Response
Date:	Friday, September 18, 2015 3:27:14 PM
Attachments:	EVLF - Stormwater inspection response.pdf

Good afternoon! Attached please find our response to the stormwater inspection conducted on August 26, 2015. Please do not hesitate to contact me should you have questions or require further information.

Thank you,

Jodi Taylor
Environmental Protection Manager – Arkansas
jtaylo28@wm.com

Waste Management of Arkansas, Inc.
Arkansas Tennessee Alabama Kentucky Market Area
100 Two Pine Drive
North Little Rock, AR 72117
Office 501.982.7336
Direct 501.487.6160
Cell 501.993.8966
Fax 501.982.2606

Eco-Vista, LLC
2210 Waste Management Drive
Springdale, Arkansas 72762
(479) 361-2069 Phone
(479) 362-5935 Fax

September 18, 2015

Arkansas Department of Environmental Quality
Attention: Mr. Matthew Holden, Stormwater Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Re: Eco-Vista Landfill – Stormwater Inspection, August 26, 2015
AFIN 72-00144; Permit Number ARG160045
Response to ADEQ Stormwater Inspection

Dear Mr. Holden:

As requested in your letter dated September 8, 2015, following are responses to the ADEQ Stormwater Inspection conducted on August 26, 2015 at the Eco-Vista Landfill. This submittal will address the items identified in the inspection letter and incorporate our comments to the inspection items. Your comments are listed first **in bold** print followed by the appropriate response from Eco-Vista, LLC, a Waste Management company.

Comment 1: Trees and shrubs were observed growing along the levees and inside the sedimentation ponds, which could impair the integrity of the ponds. This is in violation of Part 4.1 of your permit.

Response: WM is currently assessing the area for vegetation removal; however, this activity will involve dewatering of the ponds and rental of special equipment to access the area. Cleaning of vegetation from the pond cannot be safely accomplished until the ground is dry enough and stable enough to safely support the heavy equipment. WMA would like to plan a cleanout event for late Spring-early Summer when the ground should be drier and able to support the heavy equipment that will be used.

Comment 2: Lab Analyses from samples taken from Outfall 001A on June 22, 2015 indicate that the facility was unable to meet the holding time for pH as required by 40 CFR Part 136 (Attachment 1). This is in violation of Part 5.3 of your permit.

Response: WM personnel pulled field pH readings on site during sample collection and noted this on the chain of custody; however, the note was made in the calibration section so it was rather unclear. American Interplex stated they will automatically add a disclaimer to their laboratory report that the "analytical holding time exceeds regulatory requirements" because the regulation states the pH must be taken as soon as possible.

Comment 3: The Chain of Custody (COC) for samples taken from Outfall 001A on June 22, 2015 did not include preservatives used, type of sample (grab or composite), container type, sample matrix, or analyses requested (Attachment 2). This is in violation of Part 5.8 of your permit.

Response: Failure to properly complete the COC has been reviewed with site personnel.

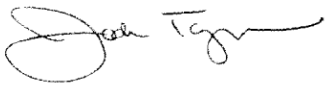
Because the Eco-Vista Landfill rarely discharges stormwater, a flow meter has not been installed. WM-Eco-Vista Landfill calculates instantaneous flow by using a five-gallon bucket during discharge. This method utilizes a 5-gallon bucket and a watch or clock with a second hand to complete the following procedure.

1. Count how many seconds it takes to fill the bucket with the water leaving the geothermal heat pump's water coil.

2. Divide 5 (gallons) by the number of seconds it took to fill the bucket, and then multiply by 60 (seconds).

We greatly appreciate your time and attention in this matter. Should you have questions or require further information, please do not hesitate to contact me at 501-982-7336 or 501-993-8966.

Sincerely,
Waste Management of Arkansas, Inc.



Jodi Taylor
Environmental Protection Manager – Arkansas

ADEQ
ARKANSAS
Department of Environmental Quality

October 1, 2015

Charles Gillian
Waste Management of Arkansas
100 Two Pine Drive
North Little Rock, AR 72117

Re: Eco-Vista Landfill Inspection Response
AFIN: 72-00144 Permit No.: ARG160045

Dear Mr. Gillian:

I have reviewed your response pertaining to my August 26, 2015, inspection of the above referenced facility. However, the information provided does not sufficiently addresses the violations referenced in my inspection report. Please provide the following:

1. Calibration records for on-site pH monitoring. Specifically, please provide pH meter calibration records for the last discharge at the facility.

2. Photographs of the geothermal heat pump's water coil where flow monitoring is measured.

The above item requires your immediate attention. Please submit a written response to these items to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response is due by October 14, 2015.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-267-0811, ext. 16 or you may e-mail me at holden@adeq.state.ar.us.

Sincerely,

Matt Holden
District 1 Field Inspector
Water Division

From:	Taylor, Jodi
To:	Water-Inspection-Report
Cc:	Holden, Matthew
Subject:	Response to October 1, 2015 Eco-Vista Inspection Letter
Date:	Friday, October 09, 2015 1:31:52 PM
Attachments:	EVLF - Stormwater inspection response 2-10.15.pdf

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Attached please find our response to the October 1, 2015 letter regarding the Eco-Vista Landfill stormwater discharge.

Thank you!

Jodi

Jodi Taylor
Environmental Protection Manager – Arkansas
jtaylo28@wm.com

Waste Management of Arkansas, Inc.
Arkansas Tennessee Alabama Kentucky Market Area
100 Two Pine Drive
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Office 501.982.7336
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Eco-Vista, LLC
2210 Waste Management Drive
Springdale, Arkansas 72762
(479) 361-2069 Phone
(479) 362-5935 Fax

October 9, 2015

Arkansas Department of Environmental Quality
Attention: Mr. Matthew Holden, Stormwater Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Re: Eco-Vista Landfill – Stormwater Inspection, August 26, 2015
AFIN 72-00144; Permit Number ARG160045
ADEQ Stormwater Inspection Letter dated October 1, 2015

Dear Mr. Holden:

Below please find responses to the October 1, 2015 ADEQ Stormwater Inspection correspondence regarding the Eco-Vista Landfill. Your comments are listed first **in bold** print followed by the appropriate response from Eco-Vista, LLC, a Waste Management company.

Request 1: Please provide calibration records for on-site pH monitoring. Specifically, please provide pH meter calibration records for the last discharge at the facility.

Response: Please see attached records.

Request 2: Please provide photographs of the geothermal heat pump's water coil where flow monitoring is measured.

Response: The Eco-Vista Landfill does not have a geothermal heat pump. This was a typographic error in the standard operating procedure. This response should have read:

Because the Eco-Vista Landfill rarely discharges stormwater, a flow meter has not been installed. WM-Eco-Vista Landfill calculates instantaneous flow by using a five-gallon bucket during discharge. This method utilizes a 5-gallon bucket and a watch or clock with a second hand to complete the following procedure.

1. *Count how many seconds it takes to fill the bucket with the water leaving the stormwater pond.*
2. *Divide 5 (gallons) by the number of seconds it took to fill the bucket, and then multiply by 60 (seconds).*

We greatly appreciate your time and attention in this matter. Should you have questions or require further information, please do not hesitate to contact me at 501-982-7336 or 501-993-8966.

Sincerely,
Waste Management of Arkansas, Inc.

Jodi Taylor
Environmental Protection Manager – Arkansas

ECO-VISTA
PH METER CALIBRATION LOG

12/22/14 CALIBRATED BY STEVE PECK & DAVID PHILLIPS STORMWATER SAMPLES

6/22/15 CALIBRATED BY DAVID PHILLIPS STORMWATER SAMPLES

ADEQ

A R K A N S A S
Department of Environmental Quality

October 13, 2015

Charles Gillian,
Waste Management of Arkansas
100 Two Pine Drive
North Little Rock, AR 72117

Re: Eco-Vista Landfill Inspection Response
AFIN: 72-00144 Permit No.: ARG160045

Dear Mr. Gillian:

I have reviewed the response pertaining to my August 26, 2015, inspection of the above referenced facility. The Department requests that all future monitoring procedures and records comply with section 5.3 Monitoring Procedures and section 5.8 Record Contents of your permit. Please be aware that monitoring and record contents must be in accordance with 40 CFR Part 136, and record contents must include: time and methods of sampling, analytical techniques used, sampling equipment used (Automated electrode meter), as well as slope and temperature at device calibration. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-267-0811, ext. 16 or you may e-mail me at holden@adeq.state.ar.us.

Sincerely,

Matt Holden
District 1 Inspector
Water Division