



# ARKANSAS

## ENERGY & ENVIRONMENT

December 9, 2020

Jodi A. Reynolds,  
Waste Management of Arkansas  
100 Two Pine Drive  
North Little Rock, AR 72117

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

Dear Ms. Reynolds:

On October 1, 2020, 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 Office of Water Quality Compliance Branch at the address below my signature or e-mailed to [Water-Inspection-Report@adeq.state.ar.us](mailto: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 **December 23, 2020**.

If I can be of any assistance, please contact me at [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us) or 479-267-0811 extension 16.

Sincerely,

A handwritten signature in blue ink that reads "Garrett Grimes".

Garrett Grimes  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118



**ARKANSAS**  
Department of Environmental Quality

## OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: <b>72-00144</b>	PERMIT #: <b>ARG160045</b>	DATE: <b>10/01/2020</b>
COUNTY: <b>72 Washington</b>	PDS #: <b>114270</b>	MEDIA: <b>WN</b>
GPS LAT: <b>36.140556</b> LONG: <b>-94.262500</b> LOCATION: <b>General Area</b>		

### FACILITY INFORMATION

NAME:  
**Eco-Vista, LLC**

LOCATION:  
**2210 Waste Management Drive**

CITY:  
**Springdale**

### INSPECTION INFORMATION

FACILITY TYPE: <b>2 - Industrial</b>	INSPECTOR ID#: <b>104111 S - State</b>		
FACILITY EVALUATION RATING: <b>2 - Marginal</b>	INSPECTION TYPE: <b>Compliance Evaluation</b>		
DATE(S): <b>10/01/2020</b>	ENTRY TIME: <b>10:20</b>	EXIT TIME: <b>14:01</b>	PERMIT EFFECTIVE DATE: <b>3/1/2020</b>
			PERMIT EXPIRATION DATE: <b>2/28/2025</b>

### RESPONSIBLE OFFICIAL

NAME: / TITLE  
**Jodi A. Reynolds /**

COMPANY:  
**Waste Management of Arkansas**

MAILING ADDRESS:  
**100 Two Pine Drive**

CITY, STATE, ZIP:  
**North Little Rock AR 72117**

PHONE & EXT: / FAX:  
**501-993-8966 /**

EMAIL:  
**jreyno@wm.com**

CONTACTED DURING INSPECTION: **No**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

### INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:  
**Blake Small, District Manager, Waste Management;  
Garrett Grimes, District 1 Inspector, ADEQ**

### AREA EVALUATIONS

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

<b>S</b>	PERMIT	<b>U</b>	FLOW MEASUREMENT	<b>M</b>	STORMWATER
<b>M</b>	RECORDS/REPORTS	<b>S</b>	LABORATORY	<b>M</b>	FACILITY SITE REVIEW
<b>M</b>	OPERATION & MAINTENANCE	<b>N</b>	EFFLUENT/RECEIVING WATER	<b>M</b>	SELF-MONITORING PROGRAM
<b>S</b>	SAMPLING	<b>N</b>	SLUDGE HANDLING/DISPOSAL	<b>N</b>	PRETREATMENT
<b>N</b>	OTHER:				

### SUMMARY OF FINDINGS

The following were noted during the inspection:


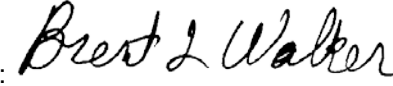
1. Effluent excursions for Outfall 001A for Total Suspended Solids (TSS) and Chemical Oxygen Demand (COD) were noted in April 2019 and May 2019, respectively. These are violations of Part 2 of the permit. Non-Compliance Reports (NCRs) were submitted by Waste Management of Arkansas (hereinafter Waste Management) ADEQ regarding these excursions.
2. Outfall 002A was added in the March 1, 2020 permit renewal. Waste Management reported no discharges occurring at Outfall 002A since the permit renewal (Attachment 1). However, staining from previous discharges was observed on the outlet structure (Photo #1). This is a violation of Part 2 of the permit.
3. Waste Management reported Daily Max of COD as 37 mg/L in June 2019 for Outfall 001. However, samples were collected on June 3 and June 24, 2019, with the Daily Max value of 49 mg/L associated with the June 24 sample event (Attachment 2). This is a violation of Part 2 of the permit.
4. The slopes and levees of the sedimentation ponds for Outfall 001A & 003A as well as the Edwards Basin were overgrown with large vegetation (Photos #2 - #4). These are violations of Part 4.1 of the permit. Vegetation on these structures must be maintained.
5. Berms used as a Best Management Practice (BMP) along active portions of the landfill were in need of maintenance (Photos #5 - #7). Erosion was noted on active slopes in these areas (Photo #7). This is an

**additional violation of Part 4.1 of the permit. These berms must be kept in place and maintained.**

6. **Blake Small, District Manager, Waste Management stated that flow is monitored at the outfalls by measuring the amount of time effluent discharged from each outfall takes to fill a five (5) gallon bucket and using that to calculate instantaneous flow. However, outfalls are constructed in a way where capturing flow in a bucket would be difficult with Outfall 001 and 002 discharging directly onto the ground and Outfall 003 discharging vertically from the ground (Photos #8 - #9 & #1). Mr. Small stated that flow is taken as more of an estimate due to the design of these outfalls. This is a violation of Part 5.2 of the permit. Flow measurement methods must be able to accurately and reliably measure the volume of discharges.**

**GENERAL COMMENTS**

1. **The pH calibration form should be updated to include Slope (%) of the meter.**
2. **Permit ARG160045 renewed on March 1, 2020. Waste Management has not reported a discharge since this time. DMRs submitted during this timeframe do not reference Total Iron. Please note that Total Iron has been added as a parameter and must be analyzed as part of effluent sampling.**

INSPECTOR'S SIGNATURE:  Garrett Grimes	DATE: 10/26/2020
SUPERVISOR'S SIGNATURE:  Brent L. Walker	DATE: 12/8/2020

<b>SECTION A: PERMIT VERIFICATION</b>	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION B: RECORDKEEPING AND REPORTING EVALUATION</b>	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION C: OPERATIONS AND MAINTENANCE</b>	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED: <u>Overgrown ponds</u>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION D: SAMPLING</b>	
<b>PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION E: FLOW MEASUREMENT</b>	
<b>PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS</b>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION F: LABORATORY</b>	
<b>PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>American Interplex</u>	
b. LAB ADDRESS: <u>8600 Kanis Rd., Little Rock, AR</u>	
c. PARAMETERS PERFORMED: <u>COD, O&amp;G, TSS</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS</b>							
BASED ON VISUAL OBSERVATIONS ONLY						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: <u>No flow</u>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001							--
<b>SECTION H: SLUDGE DISPOSAL</b>							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
<b>SECTION I: SAMPLING INSPECTION PROCEDURES</b>							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:__ <input type="checkbox"/> COMPOSITE:__ METHOD:__ FREQUENCY:							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
<b>SECTION J: STORM WATER POLLUTION PREVENTION PLAN</b>							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SWPPP UPDATED AS NEEDED: <u>12/2019</u> DATE OF LAST UPDATE:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE	

**DMR Calculation Check**

Reporting Period: From 2019 June 01 To 2019 June 30  
 Year Month Day Year Month Day

Parameter Checked: COD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Daily Max - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	<u>NA</u>	<u>37</u>	<u>NA</u>
Calculated Value:	<u>NA</u>	<u>49</u>	<u>NA</u>
Permit Value:	<u>NA</u>	<u>75</u>	<u>NA</u>

**If calculated value does not equal reported value, explain:**  
Two samples were obtained from Outfall 001A in June 2019. Waste Management appears to have reported the results from the June 3, 2019, sampling event as the daily max instead of the June 24, 2019, daily max of 49 mg/L.






**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>
Time:		Photo #:	<b>1</b>
Witness:			
Description:	<b>Outfall 002A outlet structure showing staining from previous discharge.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>
Time:		Photo #:	<b>2</b>
Witness:			
Description:	<b>Outfall 001A pond with vegetation overgrowth.</b>		



Office of Water Quality Photographic Evidence Sheet			
Location:	<b>Eco-Vista, LLC</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>
Time:			<b>12:35</b>
Witness:			Photo #: <b>3</b>
Description:	<b>Outfall 003A showing vegetation overgrowth.</b>		
			

Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>
Time:			<b>11:54</b>
Witness:			Photo #: <b>4</b>
Description:	<b>Edwards Basin with vegetation overgrowth.</b>		



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>
Time:			<b>13:02</b>
Witness:			Photo #: <b>5</b>
Description:	<b>Class 4 active portion missing berm.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>
Time:			<b>13:01</b>
Witness:			Photo #: <b>6</b>
Description:	<b>Class 4 active portion with berm in need of repair.</b>		



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>				
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>	Time:	<b>12:56</b>
Witness:				Photo #:	<b>7</b>
Description:	<b>Erosion along the class 4 active portion.</b>				



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>	Time:	<b>12:10</b>
Witness:				Photo #:	<b>8</b>
Description:	<b>Outfall 001A.</b>				



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>				
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/1/2020</b>	Time:	<b>12:25</b>
Witness:				Photo #:	<b>9</b>
Description:	<b>Outfall 002A.</b>				



Attachment 1: Table showing summarized DMR data for Outfall 002A in the year 2020.

**ARG160045 - WASTE MANAGEMENT OF ARKANSAS (72-00144)**

DMR End Date	Disch-Desig	Parameter Desc	Reported DMR Value	Limit Value	NODI Desc
03/31/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
03/31/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
03/31/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
03/31/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
03/31/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
03/31/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge
04/30/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
04/30/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
04/30/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
04/30/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
04/30/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
04/30/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge
05/31/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
05/31/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
05/31/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
05/31/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
05/31/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
05/31/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge
06/30/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
06/30/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
06/30/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
06/30/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
06/30/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
06/30/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge
07/31/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
07/31/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
07/31/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
07/31/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
07/31/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
07/31/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge
08/31/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
08/31/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
08/31/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
08/31/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
08/31/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
08/31/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge
09/30/2020	002-A	Oxygen demand, chem. [low level] [COD] (DAILY MX,	C	75	No Discharge
09/30/2020	002-A	pH (MINIMUM, SU)	C	6	No Discharge
09/30/2020	002-A	pH (MAXIMUM, SU)	C	9	No Discharge
09/30/2020	002-A	Oil & Grease (DAILY MX, mg/L)	C	15	No Discharge
09/30/2020	002-A	Iron, total [as Fe] (DAILY MX, mg/L)	C	Report	No Discharge
09/30/2020	002-A	Flow, in conduit or thru treatment plant (DAILY MX, MK	C	Report	No Discharge



July 8, 2019  
Control No. 235632  
Page 1 of 4

Waste Management Eco-Vista, LLC  
ATTN: Kaney Tyler  
2210 Waste Management Drive  
Springdale, AR 72762

This report contains the analytical results and supporting information for the sample received on June 25, 2019. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.

A handwritten signature in black ink that reads 'Steve Bradford'.

Steve Bradford  
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: Waste Management Eco-Vista, LLC  
ATTN: Mr. Tim Murray  
tmurray7@wm.com

Waste Management Eco-Vista, LLC  
ATTN: Kaney Tyler  
ktyler1@wm.com

Waste Management Eco-Vista, LLC  
ATTN: Ms. Jodi Reynolds-Coffelt  
jreyno10@wm.com

FTN Associates, Ltd.  
ATTN: Ms. Melissa Vaught  
mmv@ftn-assoc.com

FTN Associates, Ltd.  
ATTN: Mr. Nathan Siria  
njs@ftn-assoc.com



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

**SAMPLE INFORMATION**

**Project Description:**

One (1) water sample(s) received on June 25, 2019  
Waste Management - Eco-Vista Landfill  
06820  
P.O. No. 1181090259

**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:**

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
235632-1	Outfall 001 - Eco-Vista	24-Jun-2019 1320	

**Case Narrative:**

There were no qualifiers for this data and all samples met quality control criteria.

**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).





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

**ANALYTICAL RESULTS**

**AIC No.** 235632-1

**Sample Identification:** Outfall 001 - Eco-Vista 24-Jun-2019 1320

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>COD</b>		<b>49</b>	10	<b>mg/l</b>	
HACH 8000	Prep: 25-Jun-2019 0937 by 330	Analyzed: 25-Jun-2019 1315 by 330		Batch: W68590	
<b>Total Suspended Solids</b>		<b>&lt; 10</b>	10	<b>mg/l</b>	
USGS I 3765 85	Prep: 25-Jun-2019 1558 by 330	Analyzed: 26-Jun-2019 1129 by 330		Batch: W68598	
<b>Iron</b>		<b>1.2</b>	0.05	<b>mg/l</b>	
EPA 200.7	Prep: 27-Jun-2019 1012 by 100	Analyzed: 04-Jul-2019 0040 by 328		Batch: S47268	
<b>Oil and Grease</b>		<b>&lt; 5</b>	5	<b>mg/l</b>	
EPA 1664A	Prep: 04-Jul-2019 0804 by 340	Analyzed: 04-Jul-2019 1114 by 340		Batch: B11465	



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

**DUPLICATE RESULTS**

Analyte	AIC No.	Result	RPD	RPD	Preparation Date	Analysis Date	Dil	Qual
				Limit				
Total Suspended Solids	235610-1	120 mg/l			25Jun19 1558 by 330	26Jun19 1129 by 330		
	Batch: W68598 Duplicate	110 mg/l	2.46	20.0	25Jun19 1558 by 330	26Jun19 1129 by 330		
Total Suspended Solids	235627-1	< 10 mg/l			25Jun19 1558 by 330	26Jun19 1129 by 330		
	Batch: W68598 Duplicate	< 10 mg/l	0.00	20.0	25Jun19 1558 by 330	26Jun19 1129 by 330		

**LABORATORY CONTROL SAMPLE RESULTS**

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Iron	2 mg/l	102	85.0-115			S47268	27Jun19 1012 by 100	04Jul19 0013 by 328		
Oil and Grease	40 mg/l	89.0	78.0-114			B11465	04Jul19 0804 by 340	04Jul19 1114 by 340		
	40 mg/l	84.5	78.0-114	5.19	20.0	B11465	04Jul19 0804 by 340	04Jul19 1114 by 340		

**MATRIX SPIKE SAMPLE RESULTS**

Analyte	Sample	Spike	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
		Amount							
COD	235632-1	100 mg/l	104	80.0-120	W68590	25Jun19 0937 by 330	25Jun19 1315 by 330		
	235632-1	100 mg/l	104	80.0-120	W68590	25Jun19 0937 by 330	25Jun19 1315 by 330		
	Relative Percent Difference:		0.00	10.0		W68590			
Iron	235668-1	2 mg/l	101	75.0-125	S47268	27Jun19 1012 by 100	04Jul19 0018 by 328		
	235668-1	2 mg/l	93.0	75.0-125	S47268	27Jun19 1012 by 100	04Jul19 0025 by 328		
	Relative Percent Difference:		8.39	20.0		S47268			

**LABORATORY BLANK RESULTS**

Analyte	Result	RL	LOQ	QC	Preparation Date	Analysis Date	Qual
				Sample			
COD	< 10 mg/l	10	10	W68590-1	25Jun19 0937 by 330	25Jun19 1315 by 330	
Total Suspended Solids	< 10 mg/l	10	10	W68598-1	25Jun19 1558 by 330	26Jun19 1129 by 330	
Iron	< 0.04 mg/l	0.04	0.05	S47268-1	27Jun19 1012 by 100	04Jul19 0007 by 328	
Oil and Grease	< 2 mg/l	2	5	B11465-1	04Jul19 0804 by 340	04Jul19 1114 by 340	



1351632

Date	Project Name <b>Waste Management - Eco-Vista Landfill</b>	Project No. <b>06820</b>	Project Manager (Print) <b>Kaney Tyler</b>	Page <u>1</u> of <u>1</u>							
Report / Bill to: <b>Waste Management Eco-Vista LLC Tontown Landfill 2210 Waste Management Drive Springdale, AR 72762</b>	Submitted by: <b>FTN Associates, Ltd. 124 West Sunbridge Dr., Suite 3 Fayetteville, AR 72703 Office: 479-571-3334</b>		Parameters (Method Number)								
Phone: <i>[Signature]</i>	Recorded By (Print) <b>JAMES MCKEEVER</b>		<input type="checkbox"/> 24 Hours <input type="checkbox"/> 48 Hours <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Other: Due: <u>  </u> / <u>  </u> / <u>  </u>								
SAMPLE DESCRIPTION											
Sample Identification	Date	Time	Matrix*	No. of Containers	Comp	Grab	TSS	COD	O&G	Total Iron	Detection Limits
Outfall 001 - Eco-Vista	4/24/19	13:20	W X	4		X	X	X	X		Parameter Detection Limit
WM PO for AIC											
Container Type: _____ Preservative: _____ Matrix: W = Water, V = VOA vials, S = Soil, O = Other G = Glass, P = Plastic, H = HCl to pH12, T = Sodium Thiosulfate NO = None, S = Sulfuric acid pH2, N = Nitric acid pH12, B = NaOH to pH12, Z = Zinc acetate											
Relinquished By (Signature) <i>[Signature]</i>	Print Name <b>JAMES MCKEEVER</b>	Date <b>4/24/19</b>	Time <b>14:18</b>	Received By (Signature) <i>[Signature]</i>	Print Name <b>ANNA CHUNG</b>	Date <b>6-25-19</b>	Time <b>10:51</b>	Laboratory Remarks: Received By Laboratory (Signature) <i>[Signature]</i>			
Sampler Remarks: Please e-mail results to <a href="mailto:WM.KTyler@WM.com">WM.KTyler@WM.com</a> , <a href="mailto:mis@ftn-assoc.com">mis@ftn-assoc.com</a> , <a href="mailto:MMV@FTN-assoc.com">MMV@FTN-assoc.com</a> , Reynolds, Jodi < <a href="mailto:jreyno10@wm.com">jreyno10@wm.com</a> >											

**From:** [Grimes, Garrett](#)  
**To:** [McConnell, Melissa](#)  
**Subject:** FW: Response to Stormwater Inspections - Eco-Vista Landfill  
**Date:** Wednesday, February 10, 2021 12:27:39 PM  
**Attachments:** [EVLf - ARG 2020 Inspection Response.pdf](#)  
[EVLf - ARR 2020 Inspection Response.pdf](#)  
[image001.png](#)  
[image002.png](#)

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Melissa,

Could you please update the database with Waste Management's responses to the October 1, 2020, inspections at the Eco Vista Landfill (PDS 114270 & 114271).

Thank you,

**Garrett Grimes** | District 1 Inspector  
**Division of Environmental Quality | Office of Water Quality**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 479.267.0811 ext. 16 | c: [501.837.2067](tel:501.837.2067) | e : [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** Reynolds, Jodi [<mailto:jreyno10@wm.com>]  
**Sent:** Wednesday, December 16, 2020 4:19 PM  
**To:** Grimes, Garrett  
**Cc:** Small, Blake  
**Subject:** Response to Stormwater Inspections - Eco-Vista Landfill

Hi, Garrett! Attached please find our response to the stormwater inspections for Eco-Vista Landfill. There were a few items that I disagreed with; however, I could have misunderstood the interpretation. My main concern is the request to re-route stormwater from the hauling company and container yard from the existing controlled stormwater system to free-flow off the site through the industrial outfall, which would require re-engineering the existing stormwater system and some major earthwork. I have contacted the Permits section so I understand why the permits would require this, and spoke with Faison Khan. He is discussing with management and will respond once he gets feedback. Please let me know if you need more information at this time or would like to discuss.

Thanks!

Jodi

**JODI REYNOLDS**

**Environmental Protection Manager, Arkansas**

MID★SOUTH Market Area

[jreyno10@wm.com](mailto:jreyno10@wm.com)

**C:** 501.993.8966

88 Joyce Lane

Russellville, AR 72802



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**Recycling is a good thing. Please recycle any printed emails.**



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

December 15, 2020

Arkansas Department of Environmental Quality  
Attention: Mr. Garrett Grimes, Office of Water Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Re: Eco-Vista Landfill – NPDES Inspection  
AFIN 72-00144; Permit Number ARG160045  
Response to ADEQ NPDES Inspection – Class 1/Class 4

Dear Mr. Grimes:

As requested in your letter dated December 9, 2020, following are responses to the Compliance Evaluation Inspection conducted on October 1, 2020 at the Class 1/Class 4 Eco-Vista Landfill. Your comments are listed first in **bold** print followed by a description of corrective action taken.

**Comment: Effluent excursions for Outfall 001A for Total Suspended Solids (TSS) and Chemical Oxygen Demand (COD) were noted in April 2019 and May 2019, respectively. These are violations of Part 2 of the permit. Non-Compliance Reports (NCRs) were submitted to ADEQ regarding these excursions.**

Response: Corrective actions were taken as outlined in the Non-Compliance Report and no further exceedances of TSS and COD have occurred at Outfall 001A.

**Comment: Outfall 002A was added in the March 1, 2020 permit renewal. Waste Management reported no discharges occurring at Outfall 002A since the permit renewal. However, staining from previous discharges was observed on the outlet structure. This is a violation of Part 2 of the permit.**

Response: There have been no actual discharges from Outfall 002A since installation. Staining noted on the rocks at the outfall is a result of 1) testing of outfall apparatus during installation and 2) the outfall was opened in May 2020 to grab a sample for internal purposes; however, the outfall was closed after the sample was taken and all water was retained onsite. Outfall 002A was not added to the electronic DMR reporting system until July 2020, when WM contacted DEQ to notify of the oversight. Pond 002 has had capacity to retain water and a discharge has not be necessary.

**Comment: Waste Management reported Daily Max of COD as 37 mg/L in June 2019 for Outfall 001. However, samples were collected on June 3 and June 24, 2019, with the Daily Max value of 49 mg/L associated with the June 24 sample event. This is a violation of Part 2 of the permit.**

Response: There have been instances in the past when it was necessary to collect more than one sample at an outfall within one month. Because the electronic DMR program only allows one entry per month, WM contacted DEQ for guidance on how to report for months that have multiple data and was instructed to enter the results of the first sample pulled in the month. Therefore, the result from June 3, 2019 was entered in the June 2019 DMR. After receiving this inspection, WM contacted the DEQ permit engineer for verification and was advised to enter the highest value from each sampling event. Going forward, WM will enter the highest value if more than one sampling event occurs within one month.

**Comment: The slopes and levees of the sedimentation ponds for Outfall 001A & 003A as well as the Edwards Basin were overgrown with large vegetation. These are violations of Part 4.1 of the permit. Vegetation on these structures must be maintained.**

Response: WM recently cleared the front basin of ponds associated with Outfall 003 and will complete clearing woody vegetation from the back basin of the pond associated with Outfall 003 and the levees of the pond associated with Outfall 001 as soon as dry weather allow access within the ponds, which is expected to be Q2 2021. Because Edwards Basin is not a compliance point and was not constructed as a sedimentation or retention pond, WM prefers to allow the vegetation in that area to act as a filtration system, as well as contributing to our Wildlife Habitat Council (WHC) program as it is connected to a small wetland area along our certified WHC Bluebird Trail.

**Comment: Berms used as a Best Management Practice (BMP) along active portions of the landfill were in need of maintenance. Erosion was noted on active slopes in these areas. This is an additional violation of Part 4.1 of the permit. These berms must be kept in place and maintained.**

Response: As discussed during the site visit, the operators were actively pushing the run-on and run-off berms to cover trash as the working face moved. Although cover is required only weekly in Class 4, recent scavenging activities by neighbors has facilitated the need to cover daily to deter trespassers. Therefore, the berms must continually be pushed out and rebuilt throughout the day. Trespassers and scavengers are a danger and liability to the landfill, and have started fires in the Class 4. Local law enforcement is involved and the DEQ, Solid Waste Division is aware of the situation.

Also during the site visit, compost was being added to the slopes of Class 4 in preparation for fall seeding. These areas have been composted and seeded for stabilization.

**Comment: Blake Small, District Manager, Waste Management stated that flow is monitored at the outfalls by measuring the amount of time effluent discharged from each outfall takes to fill a five (5) gallon bucket and using that to calculate instantaneous flow. However, outfalls are constructed in a way where capturing flow in a bucket would be difficult with Outfall 001 and 002 discharging directly onto the ground and Outfall 003 discharging vertically from the ground. Mr. Small stated that flow is taken as more of an estimate due to the design of these outfalls. This is a violation of Part 5.2 of the permit. Flow measurement methods must be able to accurately and reliably measure the volume of discharges.**

Response: WM has asked our engineer to provide a scope to install staff gauges at Outfall 001 and 003 and create a spreadsheet to calculate discharge volumes for each pond based on staff gauge readings, to be completed in Q1 2021. A staff gauge is already installed for Outfall 002.

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 501-993-8966.

Sincerely,  
Waste Management of Arkansas, Inc.



Jodi Reynolds  
Environmental Protection Manager – Arkansas



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

December 16, 2020

Arkansas Department of Environmental Quality  
Attention: Mr. Garrett Grimes, Office of Water Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Re: Eco-Vista Landfill – NPDES Inspection  
AFIN 72-00144; Permit Number ARR000231  
Response to ADEQ NPDES Inspection – Class 1/Class 4

Dear Mr. Grimes:

As requested in your letter dated December 9, 2020, following are responses to the Compliance Evaluation Inspection conducted on October 1, 2020 at the Class 1/Class 4 Eco-Vista Landfill. Your comments are listed first in **bold** print followed by a description of corrective action taken.

**Comment: Areas covered under the Industrial Stormwater General Permit (IGP, ARR000231) include a Hauling Company Area, storage areas for unused waste bins, and a maintenance area with tanks for the leak detection system. The site map shows that only the maintenance area with the leak detection system drains to Outfall 004. Stormwater discharges from areas covered under the IGP must be monitored. Stormwater must be routed to Outfall 004 or additional outfalls must be monitored.**

Response: As stated in Section 4.2 of the SWPPP, the hauling company and container storage area is included in Drainage Area 2. Stormwater from this area drains to the pond associated with ARG160045 Outfall 003A, and therefore is monitored anytime a discharge occurs from the pond. At one time, these areas were included in the Landfill General Permit; however, several years ago DEQ required all areas other than the waste mass itself be re-permitted through the Industrial Stormwater General Permit. Re-routing stormwater from the hauling company and container storage area would require re-engineering and re-designing the entire stormwater drainage system of the landfill. Eco-Vista respectfully disagrees that the stormwater system should be redesigned because the change in permit requirements was made after the stormwater system was designed. Further, the Landfill General Permit requirements are more stringent than the Industrial Stormwater General Permit because it requires monthly reporting and sampling each time a discharge occurs.

**Comment: The site map shows Outfall 004 as Outfall 002A. In addition, the Hauling Company Area now has an impermeable asphalt surface instead of the previous gravel. The site map and Stormwater Pollution Prevention Plan (SWPPP) must be updated to reflect the current design and designations of the facility.**

Response: The SWPPP is currently being revised by our consultant to include the impermeable asphalt surface area and correct the map to depict the industrial outfall as 004.

**Comment: Total Iron and Oil & Grease are not included in the Stormwater Annual Reports (SWARs) for 2018 and 2019. This is a violation of Part 3.4 of the permit. Total Iron and Oil and Grease are included in the benchmark analysis for 2018. All required benchmark parameters must be included in the SWAR.**

Response: According to Part 3.4 of the 2014 and the 2019 ARR permits, required effluent characteristics for all permit holders include pH and TSS. Additionally, COD is required by Industrial Sub-Sector L1, which is Industrial Sector assigned by DEQ to both the 2014 and 2019 Eco-Vista IGP. We do not believe we have requirements for sampling Total Iron and Oil and Grease.



**Comment:** Chain of Custody (COC) forms associated with the SWARs indicate that pH is being held past the holding time of 15 minutes. This is a violation of Part 3.8.2.4 of the permit.

Response: The pH was taken at the time of field sampling during the 2018 annual event and was within hold time. The pH was taken at the laboratory during the 2019 annual sampling event because a pH meter was not available onsite at the time of sampling. The site now has a pH meter stored at the office for use.

**Comment:** The stormwater outfall associated with the permit is Outfall 004. The location on the site map is Outfall 002A which matches the coordinates for Outfall 004. On April 14, 2020, an Outfall Modification form was approved changing the stormwater outfall associated with permit ARR000231 from Outfall 001 to Outfall 004. Prior to this the facility had been sampling from Outfall 002 (002A/004) for the 2018 and 2019 SWARs. Stormwater monitoring associated with this permit must occur at the designated outfall(s). If stormwater from multiple areas associated with this permit discharge through different outfalls, then the permit must be modified to include these outfalls. Lab sheets and SWARs must refer to the correct sampling location.

Response: These discrepancies were self-identified by the site in April 2020, when the Outfall Modification Form was submitted to DEQ. Outfall 004 (formerly identified as Outfall 001 and 002A) is the only outfall that has been sampled in association with the IGP. The SWPPP is currently being revised to reflect the correct Outfall identification.

**Comment:** Hay bales used as a Best Management Practice were in need of repair/replacement.

Response: The hay bales were installed in the Spring after the area was graded. The hay bales have now been replaced with rock check dams.

**Comment:** Benchmark exceedances were noted in the 2018 SWAR for TSS and COD. A plan is noted in the SWAR for TSS, but does not include COD. This is a violation of Part 3.12.1 of the permit.

Response: Eco-Vista respectfully disagrees. A Corrective Action Plan Summary was detailed in the SWAR Appendix, where COD is reported. Sloping the area for slower drainage and stabilizing with vegetation would allow for better filtration of stormwater runoff from the maintenance area, which should lower TSS and COD.

**Comment:** Spilled oil was observed on the ground and adjacent to buildings where prior oil spills seeped through the walls and onto the ground. In addition, a pump for the leak detection system was leaking. Areas where spills and leaks have occurred must be remediated as per the facility's good housekeeping program. Leaking equipment must be repaired as part of proper operation and maintenance at the facility.

Response: Eco-Vista has cleaned the oil staining and repaired the pump. SWPPP/SPCCP training was conducted and BMPs were reviewed.

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 501-993-8966.

Sincerely,  
Waste Management of Arkansas, Inc.



Jodi Reynolds  
Environmental Protection Manager – Arkansas



# ARKANSAS

## ENERGY & ENVIRONMENT

March 3, 2021

Jodi A. Reynolds  
Waste Management of Arkansas  
100 Two Pine Drive  
North Little Rock, AR 72117

**Re: Response to Inspection**  
**AFIN: 72-00144**

**Permit No.: ARG160045**

Dear Ms. Reynolds:

I have reviewed your response pertaining to my October 1, 2020, Compliance Evaluation Inspection of Eco-Vista landfill. Upon review the information provided does not sufficiently address the violations referenced in my inspection report.

1. Your response states that the overgrown vegetation on the slopes and levees for the sedimentation ponds associated with Outfalls 001A and 003A has been partially cleared. You state that the remaining maintenance is likely to occur in Quarter 2 of 2021. Please submit photographs showing maintenance that has been conducted. Please give a date for the final completion of the corrective action.
2. Your response states that berms used along active portions and slopes noted as missing or in need of repair have been replaced or stabilized. Please submit photographs showing this.
3. Your response states that staff gauges have been scheduled for installation in ponds discharging to Outfall 001A and 003A, and that the installation will occur in quarter 1 of 2021. Please submit a timeline for completion or photographs showing the gauges have been installed.

This work/documentation should be completed/submitted as soon as possible. Please provide the information no later than **March 22, 2021**. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2067 or email me at [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads "Garrett Grimes".

Garrett Grimes  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

**From:** [Grimes, Garrett](#)  
**To:** [McConnell, Melissa](#)  
**Subject:** FW: Response to ARG Inspection  
**Date:** Tuesday, May 4, 2021 11:35:44 AM  
**Attachments:** [EVLf - ARG 2020 Response to Inspection Response.pdf](#)  
[image001.png](#)

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Melissa,

Attached is a response from Waste Management of Arkansas regarding the October 1, 2021, CEI at the Eco-Vista Landfill (PDS 114270).

Thank you,

**Garrett Grimes** | District 1 Inspector  
**Division of Environmental Quality | Office of Water Quality**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 479.267.0811 ext. 16 | c: [501.837.2067](tel:501.837.2067) | e : [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** Reynolds, Jodi [<mailto:jreyno10@wm.com>]  
**Sent:** Friday, April 23, 2021 2:19 PM  
**To:** Grimes, Garrett  
**Subject:** Response to ARG Inspection

Good afternoon! Please find attached our response to our March 3, 2021 letter. Please do not hesitate to contact me should you need questions or require additional information. Thank you, and I hope you have a good weekend!

Jodi

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**Recycling is a good thing. Please recycle any printed emails.**



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

April 23, 2021

Arkansas Department of Environmental Quality  
Attention: Mr. Garrett Grimes, Office of Water Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Re: Eco-Vista Landfill – NPDES Inspection  
AFIN 72-00144; Permit Number ARG160045  
Response to ADEQ NPDES Inspection – Class 1/Class 4

Dear Mr. Grimes:

As requested in your letter dated March 3, 2021, following is more information required to address the original alleged violations from October 1, 2020. Your comments are listed first in **bold** print followed by Eco-Vista's response.

**Comment: Your response states that the overgrown vegetation on the slopes and levees for the sedimentation ponds associated with Outfalls 001A and 003A has been partially cleared. You state that the remaining maintenance is likely to occur in Quarter 2 of 2021. Please give a date for the final completion of the corrective action.**

Response: The berms along the west basin (associated with Outfall 001A) were partially cleared in 2020. The remainder of vegetation on the west pond slopes and south pond berms will be cleared by June 30, 2021. Please see photo log, attached.

**Comment: Your response states that berms used along active portions and slopes noted as missing or in need of repair have been replaced or stabilized. Please submit photographs showing this.**

Response: Please see attached photo log.

**Comment: Your response states that staff gauges have been scheduled for installation in ponds discharging to Outfall 001A and 003A, and that the installation will occur in Quarter 1 of 2021. Please submit a timeline for completion or photographs showing the gauges have been installed.**

Response: Eco-Vista Landfill engaged a consultant to assist with the staff gauge placement in January 2021. At this time, they are working on finalizing the stage-storage relationships for the outfalls so a discharge volume can be estimated between opening and closing discharge valve. The project is taking longer than originally anticipated, and we expect to install the staff gauges in May.

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 501-993-8966.

Sincerely,  
Waste Management of Arkansas, Inc.

A handwritten signature in black ink, appearing to read 'Jodi Reynolds', is written over a light blue horizontal line.

Jodi Reynolds  
Environmental Protection Manager – Arkansas



West Pond-  
Outfall 001



- Class 4 Berm





# ARKANSAS

## ENERGY & ENVIRONMENT

June 11, 2021

Jodi A, Reynolds  
Waste Management of Arkansas  
100 Two Pine Drive  
North Little Rock, AR 72117

**Re: Response to Inspection**  
**AFIN: 72-00144**

**Permit No.: ARG160045**

Dear Ms. Reynolds:

I have reviewed your response pertaining to my October 1, 2020, inspection of Eco-Vista Landfill. Upon review the information provided does not sufficiently addresses the violations referenced in my inspection report.

1. The response states that the remainder of vegetation to be cleared on the west and south pond slopes is scheduled to be completed by June 30, 2021. Please submit notification and photographs showing completion.
2. The response states that a consultant has been hired to assist with staff gauge placement in ponds discharging to Outfalls 001A and 003A and installation is expected to occur in May 2021. Please submit notification that this has occurred.

This work should be completed as soon as possible. Please provide the information requested no later than **July 7, 2021**. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2067 or email me at [inspector@adeq.state.ar.us](mailto:inspector@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads "Garrett Grimes".

Garrett Grimes  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

**From:** [Grimes, Garrett](#)  
**To:** [McConnell, Melissa](#)  
**Subject:** FW: Per our phone call earlier  
**Date:** Friday, October 22, 2021 9:39:44 AM  
**Attachments:** [image005.png](#)  
[image006.png](#)  
[EVLf - ARG 2020 Response to Inspection Response-8.21.pdf](#)  
[image003.png](#)  
[image004.png](#)

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Melissa,

Could you please attach this response to the Eco-Vista Landfill inspection. PDS 114270.

Thank you,

**Garrett Grimes** | District 1 Inspector  
**Division of Environmental Quality | Office of Water Quality**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 479.267.0811 ext. 16 | c: [501.837.2067](tel:501.837.2067) | e : [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** Reynolds, Jodi [<mailto:jreyno10@wm.com>]  
**Sent:** Tuesday, August 10, 2021 8:28 AM  
**To:** Grimes, Garrett  
**Subject:** RE: Per our phone call earlier

Good morning, Garrett! Attached please find a response to your letter addressing NPDES Permit ARG160045. Thank you for granting us an extended timeframe to respond, as we did not receive the original letter via mail in June. Should you have questions or need more information, please do not hesitate to give me a call. Thank you!

Jodi

**JODI REYNOLDS**  
**Environmental Protection Manager, Arkansas**  
MID★SOUTH Market Area  
[jreyno10@wm.com](mailto:jreyno10@wm.com)



C: 479.699.1475  
88 Joyce Lane  
Russellville, AR 72802



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**From:** Grimes, Garrett <grimes@adeq.state.ar.us>  
**Sent:** Wednesday, July 28, 2021 3:01 PM  
**To:** Reynolds, Jodi <jreyno10@wm.com>  
**Cc:** Walker, Brent <WALKER@adeq.state.ar.us>  
**Subject:** [EXTERNAL] RE: Per our phone call earlier

Jodi,

I'm attaching PDFs of the two letters. Please let me know if you need any more information or have questions.

Thank you,

**Garrett Grimes** | District 1 Inspector  
**Division of Environmental Quality | Office of Water Quality**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 479.267.0811 ext. 16 | c: [501.837.2067](tel:501.837.2067) | e : [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** Reynolds, Jodi [<mailto:jreyno10@wm.com>]  
**Sent:** Wednesday, July 28, 2021 2:41 PM  
**To:** Grimes, Garrett  
**Subject:** Per our phone call earlier

Garrett,

I have not received any correspondence after I sent the April 2021 responses to your May 2021 letters. I understand I should have received one last month and one recently. Is it possible to receive these by e-mail? WM has changed our status to remote, so I do not always receive mail that is sent directly to the sites.

Thank you!

Jodi

**JODI REYNOLDS**

**Environmental Protection Manager, Arkansas**

MID★SOUTH Market Area

[jreyno10@wm.com](mailto:jreyno10@wm.com)

**C:** 479.699.1475

88 Joyce Lane

Russellville, AR 72802



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

August 10, 2021

Arkansas Department of Environmental Quality  
Attention: Mr. Garrett Grimes, Office of Water Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Re: Eco-Vista Landfill – NPDES Inspection  
AFIN 72-00144; Permit Number ARG160045  
Response to ADEQ NPDES Inspection – Class 1/Class 4

Dear Mr. Grimes:

As requested in your letter dated June 11, 2021, following is more information required to address the original alleged violations from October 1, 2020. Your comments are listed first in **bold** print followed by Eco-Vista's response.

**Comment: Your response states that the remainder of the vegetation on the slopes to be cleared on the west and south pond slopes is scheduled to be completed by June 30, 2021. Please submit notification and photographs showing completion.**

Response: The remainder of vegetation on the west pond slopes and south pond berms was cleared by June 30, 2021. Please see photo log, attached.

**Comment: Your response states that a consultant has been hired to assist with staff gauge placement in ponds discharging to Outfalls 001A and 003A and installation is expected to occur in May 2021. Please submit notification that this has occurred.**

Response: Staff gauges were installed in ponds discharging to Outfalls 001A and 003A in May of 2021 by Promus Engineers.

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 479-699-1475.

Sincerely,  
Waste Management of Arkansas, Inc.

A handwritten signature in black ink that reads 'Jodi Reynolds'.

Jodi Reynolds  
Environmental Protection Manager – Arkansas



003

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001

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# ARKANSAS

## ENERGY & ENVIRONMENT

December 13, 2021

Jodi A. Reynolds  
Waste Management of Arkansas  
100 Two Pine Drive  
North Little Rock, AR 72117

**RE: Response to Inspection**  
**AFIN: 72-00144**

**Permit No.: ARG160045**

Dear Ms. Reynolds:

I have reviewed the response pertaining to my October 1, 2021, Compliance Evaluation Inspection of the Eco-Vista Landfill. The information provided sufficiently addresses the items referenced in my inspection report. 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 I require further information concerning this matter I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2067 or you may email me at [grimes@adeq.state.ar.us](mailto:grimes@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads 'Garrett Grimes'.

Garrett Grimes  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118