



# ARKANSAS

## ENERGY & ENVIRONMENT

December 9, 2020

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

RE: Eco-Vista, LLC Inspection  
AFIN: 72-00144 Permit No.: ARR000231

Dear Mr. Gillian:

On October 1, 2020, I performed an Industrial Stormwater 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 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**.

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

## WATER DIVISION INSPECTION REPORT

AFIN: <b>72-00144</b>	PERMIT #: <b>ARR000231</b>	DATE: <b>10/01/2020</b>
COUNTY: <b>72 Washington</b>	PDS #: <b>114271</b>	MEDIA: <b>WN</b>
GPS LAT: <b>36.140556</b> LONG: <b>-94.262500</b> LOCATION: <b>General Area</b>		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: <b>Eco-Vista, LLC</b> LOCATION: <b>2210 Waste Management Drive</b> CITY: <b>Springdale</b>	FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>104111 S - State</b> FACILITY EVALUATION RATING: <b>N</b> INSPECTION TYPE: <b>Industrial Stormwater</b> DATE(S): <b>10/01/2020</b> ENTRY TIME: <b>10:20</b> EXIT TIME: <b>11:40</b> PERMIT EFFECTIVE DATE: <b>6/9/2020</b> PERMIT EXPIRATION DATE: <b>6/30/2024</b>
RESPONSIBLE OFFICIAL	FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>
NAME / TITLE: <b>Charles Gillian /</b> COMPANY: <b>Eco-Vista, LLC</b> MAILING ADDRESS: <b>2210 Waste Management Drive</b> CITY, STATE, ZIP: <b>Springdale AR 72762</b> PHONE & EXT. / FAX: <b>501-993-8966 /</b> EMAIL: <b>jreyno10@wm.com</b> CONTACTED DURING INSPECTION: <b>No</b>	INSPECTION PARTICIPANTS
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Blake Small, District Manager, Waste Management;</b> <b>Anthony Sedillos, District Manager, Waste management;</b> <b>James Wadlow, Fleet Manager, Waste Management;</b> <b>Garrett Grimes, District 1 Inspector, ADEQ</b>

### AREA EVALUATIONS

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

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

### SUMMARY OF FINDINGS

The following violations were noted during the inspection:

1. 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 (Attachment 1). The site map shows that only the maintenance area with the leak detection system drains to Outfall 004 (Attachment 1). Stormwater discharges from areas covered under the IGP must be monitored. Stormwater must be routed to Outfall 004 or additional outfalls must be monitored.
2. The site map shows Outfall 004 as Outfall 002A (Attachment 1). 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.
3. Total Iron and Oil & Grease are not included in the Stormwater Annual Reports (SWARs) for 2018 and 2019 (Attachment 2). 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.
4. Chain of Custody (COC) forms associated with the SWARs indicate that pH is being held past the holding time of 15 minutes (Attachment 2). This is a violation of Part 3.8.2.4 of the permit.
5. 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 (Attachment 1). On April 14, 2020, an Outfall Modification form was approved changing the stormwater outfall associated with permit ARR000231 from Outfall 001 to Outfall 004 (Attachment 3). Prior to this the facility had been sampling from Outfall 002 (002A/004) for the 2018 and 2019 SWARs (Attachment 2). 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.**

6. **Hay bales used as a Best Management Practice were in need of repair/replacement (Photos #1 - #2).**
7. **Benchmark exceedances were noted in the 2018 SWAR for TSS and COD (Attachment 1). A corrective action 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.**
8. **Spilled oil was observed on the ground and adjacent to buildings where prior oil spills seeped through the walls and onto the ground (Photos #3 - #6). In addition, a pump for the leak detection system was leaking (Photo #7). 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.**

**GENERAL COMMENTS**

**None**

INSPECTOR'S SIGNATURE:



**Garrett Grimes**

DATE: **10/22/2020**

SUPERVISOR'S SIGNATURE:



**Brent L. Walker**

DATE: **12/8/2020**

### Inspection Form Legend:

**S = Satisfactory, M = Marginal, U = Unsatisfactory, Y = Yes, N = No, NI = Not Implemented, NA = Not Applicable, NE = Not Evaluated –**

*If Y and a NI are check it means it is in the SWPPP but not implemented in the field which is a violation.*

<b>SECTION A: PERMIT VERIFICATION</b>	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	" S <input checked="" type="checkbox"/> M " U " NA " NE
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y " N " NA " NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input checked="" type="checkbox"/> Y " N " NA " NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	" Y <input checked="" type="checkbox"/> N " NA " NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y " N " NA " NE
<b>Comments:</b>	
<b>SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION</b>	
PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	" S <input checked="" type="checkbox"/> M " U " NA " NE
1. Is the SWPPP available for review by ADEQ? (Part 4.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
2. Has SWPPP been updated since 07/01/2014, or later if required? (Part 4.1, Part 4.5)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
3. Does the SWPPP contain facility name, general permit tracking number, facility physical address, and SIC and NAICS codes? (Part 4.2.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
4. Pollution Prevention Team	
A. Does the SWPPP identify specific individuals or positions?(Part 4.2.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B. Does the SWPPP outline the responsibilities of each member of the Pollution Prevention Team? (Part 4.2.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
5. Does the SWPPP contain a facility description (process diagram, general layout, storage of raw materials, the flow of goods and materials through the facility and seasonal variations)? (Part 4.2.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
6. Does the facility site map contain the following items?	
A) The size of the property in acres? (Part 4.2.3.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B) The location and extent of significant structures and impervious surfaces? (Part 4.2.3.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
C) The direction of stormwater flow using arrows? (Part 4.2.3.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
D) The locations of all existing structural control measures? (Part 4.2.3.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
E) The locations of all receiving waters in the immediate vicinity of the facility? (Part 4.2.3.5)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
F) The locations of all stormwater conveyances including ditches, pipes, and swales? (Part 4.2.3.6)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
G) The locations of potential pollutant sources? (Part 4.2.3.7)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
H) The locations of all stormwater monitoring points? (Part 4.2.3.8)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
I) The locations of stormwater inlets and outfalls with unique identification code for each outfall with indications if one or more outfall is being treated as "substantially identical" and an approximate outline of the areas draining to each outfall? (Part 4.2.3.9)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
J) Where the stormwater discharges to municipal separate storm sewer system (MS4), if applicable? (Part 4.2.3.10)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
K) The locations and descriptions of all non-stormwater discharges identified in the SWPPP? (Part 4.2.3.11)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
L) The locations of the following activities if they are exposed to precipitation? (Part 4.2.3.12)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Fueling Stations	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Vehicle and equipment maintenance and/or cleaning areas	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Loading and unloading areas	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Locations used for the treatment, storage, or disposal of waste	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
Liquid storage tanks	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Processing and storage areas	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Transfer areas for substances in bulk	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
Machinery	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
M) The locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? (Part 4.2.3.13)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE

<b>7. A description of potential pollutant sources</b>	
A) A list of industrial activities exposed to stormwater (Part 4.2.4.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) A list of pollutants associated with each identified activity, including all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the 3 years prior to the SWPPP date (Part 4.2.4.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Locations where spills/leaks could occur that may contribute pollutants to stormwater discharges and the corresponding outfall(s) (Part 4.2.4.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) A list of significant spills and significant leaks of toxic or hazardous pollutants that have occurred in areas exposed to precipitation or drained to a stormwater conveyance for three years prior to the SWPPP date (Part 4.2.4.3)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
E) Measures to identify and eliminate Non-stormwater Discharges (Part 4.2.4.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Certification that outfalls have been tested for illicit Non-stormwater Discharges (Part 4.2.4.4)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
G) Location of storage piles containing salt used for deicing or other commercial or industrial purposes (Part 4.2.4.5)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
H) A summary of existing discharge sampling data (Part 4.2.4.6) Template	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>8. Measures and Controls (Part 4.2.5)</b>	
A) Does SWPPP describe stormwater controls appropriate for the facility?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Have the selected controls been implemented?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>9. Documentation of:</b>	
A) Good Housekeeping (Part 4.2.6.1.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Preventative Maintenance (Part 4.2.6.1.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Spills and Response Procedures (Part 4.2.6.1.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Employee Training (Part 4.2.6.1.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Monitoring – Benchmark, ELG, other (Part 4.2.6.2.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Sample Location(s), Parameters, Limits, and Procedures (Part 4.2.6.2.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
G) Inspections (Part 4.2.6.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
a. Routine	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
b. Comprehensive	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
c. Name of Inspector	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
d. Schedule for Inspections	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
e. Specific items inspected, including outfalls	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
10. Does stormwater discharge to a 303(d) listed or TMDL stream? (Part 4.2.7.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
If yes, are additional requirement met?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
11. Does stormwater direct discharge to an ERW, NSW, or ESW? (Part 4.2.7.2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
If yes, are additional requirement met?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
12. Is the SWPPP signed and certified? (Part 4.2.8)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>Comments:</b>	
<b>SECTION C: MONITORING &amp; INSPECTIONS</b>	
PERMITTEE MONITORING MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Is the facility one of the four Effluent Guideline Facilities in the Permit? (Cement MFG, Fertilizer MFG, Steam Electric coal pile, Paving and Roofing Materials, or Airport Deicing)(Part 3.3.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
A) Are all outfalls from the regulated process being sampled? (Part 3.3.2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B) If coal pile run off is monitored, are all other stormwater flows excluded? (Part 3.3.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C) If airport with annual jet departures ≥ 1000, is effluent limit met? (Part 3.3.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B) If airport, is at least 60% of deicing fluid collected? (Part 3.3.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. Which of the monitoring categories is this facility subject to: (Parts 1.5, 3.4)	
A) Are samples being collected for each monitoring period (annually)? (Part 3.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Are samples being collected from the location specified in the NOI and SWPPP (Part 3.7)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Has the permittee determined that some of the outfalls are similar? (Part 3.8.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Are the conditions on the ground still the same as documented for the similar outfalls (Part 3.8.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D) Are all parameters for the monitoring category being sampled and analyzed? (Part 3.4)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Were the samples collected during a measureable storm event? (Part 3.8.2.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Were the samples properly preserved and analyzed? (Part 3.8.2.4)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

G) Are the sample locations suitable for the collection of a representative sample? (Part 3.8.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Has any of the monitoring revealed an exceedance of the benchmark values for this facility?(Part 3.12.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
A) Has a process to develop a corrective action plan been started within 30 days of exceedances? (Part 3.12.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Is the exceedance attributed to natural background pollutant level? (Part 3.12.2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) If the exceedance is naturally occurring, has the Department been notified? (Part 3.12.2.3)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
<b>4. Inspections (Part 5.1)</b>	
A) Visual Site Inspections (minimum 4/year) (Part 5.1.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) At least one visual inspection conducted during a rain event	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Inspections recorded and include: date of inspection, person doing inspection; major observations, and corrective actions required.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Comprehensive Site Compliance Evaluation (Annual) (Part 5.1.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

Comments:

**SECTION D: RECORD KEEPING**

PERMITTEE RECORD KEEPING AND REPORTING MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Has SWAR for the previous year of monitoring been completed? (Part 5.2.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Include sample results, lab reports, chain of custody?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Significant findings of inspections?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Summary of corrective action plans?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. Is the SWAR signed? (Part 5.2.4.5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Is permittee keeping copies of inspections? (Part 5.2.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

Comments:

**SECTION E: FACILITY TOUR**

PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Any evidence of erosion or un-stabilized ground?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Any controls, structures, or storage areas that are not as identified in the SWPPP?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Any non-stormwater discharges <u>not</u> identified in the SWPPP? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
6. Are BMPs being properly operated and maintained? (Part 7.17)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
7. Are housekeeping procedures being implemented and are they sufficient?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
8. Toxicity testing recommended? (Part 6)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N

Comments:



Water Division Photographic Evidence Sheet			
Location:	<b>Eco-Vista, LLC</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>
Time:			<b>11:11</b>
Witness:			Photo #:
			<b>1</b>
Description:	<b>Hay bales in need of maintenance/replacement</b>		
			
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>
Time:			<b>11:11</b>
Witness:			Photo #:
			<b>2</b>
Description:	<b>Continued from Photo #1.</b>		
			



**Water Division Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>		
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>
Time:		Photo #:	<b>3</b>
Witness:			
Description:	<b>Oil on the ground in the maintenance area near Outfall 004.</b>		



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>
Time:		Photo #:	<b>4</b>
Witness:			
Description:	<b>Oil on ground outside of a building in the maintenance area.</b>		





**Water Division Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>				
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>	Time:	<b>11:29</b>
Witness:				Photo #:	<b>5</b>
Description:	<b>Oil spill.</b>				



Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>	Time:	<b>11:31</b>
Witness:				Photo #:	<b>6</b>
Description:	<b>Oil spill in a maintenance building.</b>				



**Water Division Photographic Evidence Sheet**

Location:	<b>Eco-Vista, LLC</b>				
Photographer:	<b>Garrett Grimes, District 1 Inspector</b>	Date:	<b>10/01/2020</b>	Time:	<b>11:39</b>
Witness:				Photo #:	<b>7</b>
Description:	<b>Leaking leak detection system pump.</b>				







ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
 STORMWATER ANNUAL REPORT (SWAR) FORM  
 PERMIT NUMBER: ARR000231 AFIN: 72-00144

INDUSTRIAL SECTOR: L1 REPORTING YEAR: 2018  
**SWAR APPENDIX ATTACHED?\***  
 YES  NO

PERMITTEE NAME: Eco-Vista, Inc  
 PHYSICAL ADDRESS: 2210 Waste Management Drive

FACILITY NAME: Eco-Vista Landfill  
 CITY: Springdale, AR

PARAMETER	BENCHMARK VALUE	QUALITY OR CONCENTRATION	UNITS	OUTFALL NUMBER	BENCHMARK EXCEEDED?
Total Suspended Solids (TSS)	100	1100	mg/L	002	<input checked="" type="checkbox"/> YES** <input type="checkbox"/> NO
pH	6.0-9.0	6.8	S.U.	002	<input type="checkbox"/> YES** <input checked="" type="checkbox"/> NO

\*\*If a benchmark is exceeded, a corrective action plan summary is required

**STORMEVENT DETAILS**

DATE OF SAMPLED STORMEVENT	<u>12.13.18</u>	INCHES
ESTIMATE OF RAINFALL	<u>0.89</u>	DAYS
TIME SINCE LAST MEASURABLE EVENT	<u>4</u>	

**COMMENTS:**

TSS exceeded benchmark value -- area was disturbed from construction of new maintenance building  
 SIGNIFICANT FINDINGS FROM EVALUATION OR INSPECTIONS: N/A

**CORRECTIVE ACTION PLAN SUMMARY, INCLUDING STATUS OF ANY CORRECTIVE ACTIONS NOT YET COMPLETED:**

Erosion noted in channel. Shape channel for slower drainage then stabilize the area by seeding with fall mix and adding BMPs such as hay bales, straw wattles.

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

Jodi Reynolds 1.25.19  
 SIGNATURE & DATE

Jodi Reynolds, EP Manager  
 PRINTED NAME & TITLE OF OFFICIAL





ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
 STORMWATER ANNUAL REPORT (SWAR) FORM  
 PERMIT NUMBER: ARR000231 AFIN: 72-00144

INDUSTRIAL SECTOR: L1 REPORTING YEAR: 2019  
**SWAR APPENDIX ATTACHED?\***  
 YES  NO

PERMITTEE NAME: Eco-Vista, Inc FACILITY NAME: Eco-Vista Landfill  
 PHYSICAL ADDRESS: 2210 Waste Management Drive CITY: Springdale, AR

PARAMETER	BENCHMARK VALUE	QUALITY OR CONCENTRATION	UNITS	OUTFALL NUMBER	BENCHMARK EXCEEDED?
Total Suspended Solids (TSS)	100	10	mg/L	002	<input type="checkbox"/> YES** <input checked="" type="checkbox"/> NO
pH	6.0-9.0	7.8	S.U.	002	<input type="checkbox"/> YES** <input checked="" type="checkbox"/> NO

\*\*If a benchmark is exceeded, a corrective action plan summary is required

STORM EVENT DETAILS			
DATE OF SAMPLED STORM EVENT	ESTIMATE OF RAINFALL		
	1		INCHES
TIME SINCE LAST MEASURABLE EVENT	3		DAYS

COMMENTS:

SIGNIFICANT FINDINGS FROM EVALUATION OR INSPECTIONS: N/A

**CORRECTIVE ACTION PLAN SUMMARY**, INCLUDING STATUS OF ANY CORRECTIVE ACTIONS NOT YET COMPLETED: N/A

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

Jodi Reynolds 1.25.19 Jodi Reynolds, EP Manager  
 SIGNATURE & DATE PRINTED NAME & TITLE OF OFFICIAL





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

**SAMPLE INFORMATION**

**Project Description:**

One (1) water sample(s) received on December 18, 2018  
Waste Management - Eco-Vista Landfill  
06820-0100-005

**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>
229848-1	SW-002	14-Dec-2018 1430	

**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. 229848-1

Sample Identification: SW-002 14-Dec-2018 1430

Analyte		Result	RL	Units	Qualifier
<b>COD</b>		250	10	mg/l	
HACH 8000	Prep: 20-Dec-2018 1255 by 330	Analyzed: 21-Dec-2018 0940 by 330		Batch: W66477	
<b>Total Suspended Solids</b>		1100	70	mg/l	
USGS I 3765 85	Prep: 20-Dec-2018 1038 by 326	Analyzed: 21-Dec-2018 1041 by 326		Batch: W66475	
<b>Iron</b>		60	0.05	mg/l	
EPA 200.7	Prep: 19-Dec-2018 1407 by 100	Analyzed: 21-Dec-2018 1639 by 308		Batch: S46306	
<b>Oil and Grease</b>		< 5	5	mg/l	
EPA 1664A	Prep: 20-Dec-2018 0937 by 328	Analyzed: 20-Dec-2018 1438 by 328		Batch: B11199	



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

**DUPLICATE RESULTS**

Analyte	AIC No.	Result	RPD		Preparation Date	Analysis Date	Dil	Qual
			RPD	Limit				
Total Suspended Solids	229807-1	230 mg/l			20Dec18 1038 by 326	21Dec18 1041 by 326		
	Batch: W66475 Duplicate	250 mg/l	10.5	20.0	20Dec18 1044 by 326	21Dec18 1041 by 326		
Total Suspended Solids	229807-2	8400 mg/l			20Dec18 1038 by 326	21Dec18 1041 by 326		
	Batch: W66475 Duplicate	8300 mg/l	0.959	20.0	20Dec18 1044 by 326	21Dec18 1041 by 326		

**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			W66477	20Dec18 1255 by 330	21Dec18 0920 by 330		
Iron	2 mg/l	97.5	85.0-115			S46306	19Dec18 1407 by 100	21Dec18 1513 by 308		
Oil and Grease	40 mg/l	92.5	78.0-114			B11199	20Dec18 0937 by 328	20Dec18 1438 by 328		
	40 mg/l	93.5	78.0-114	1.08	20.0	B11199	20Dec18 0937 by 328	20Dec18 1438 by 328		

**MATRIX SPIKE SAMPLE RESULTS**

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	229855-1	100 mg/l	99.0	80.0-120	W66477	20Dec18 1255 by 330	21Dec18 0920 by 330		
	229855-1	100 mg/l	99.0	80.0-120	W66477	20Dec18 1255 by 330	21Dec18 0920 by 330		
	Relative Percent Difference:		0.00	10.0	W66477				
Iron	229867-1	2 mg/l	86.0	75.0-125	S46306	19Dec18 1407 by 100	21Dec18 1539 by 308		
	229867-1	2 mg/l	87.5	75.0-125	S46306	19Dec18 1407 by 100	21Dec18 1543 by 308		
	Relative Percent Difference:		1.48	20.0	S46306				

**LABORATORY BLANK RESULTS**

Analyte	Result	RL	PQL	QC		Preparation Date	Analysis Date	Qual
				Sample	QC			
COD	< 10 mg/l	10	10	W66477-1	QC	20Dec18 1255 by 330	21Dec18 0920 by 330	
Total Suspended Solids	< 10 mg/l	10	10	W66475-1	QC	20Dec18 1044 by 326	21Dec18 1041 by 326	
Iron	< 0.05 mg/l	0.05	0.05	S46306-1	QC	19Dec18 1407 by 100	21Dec18 1502 by 308	
Oil and Grease	< 5 mg/l	5	5	B11199-1	QC	20Dec18 0937 by 328	20Dec18 1438 by 328	





220 North Knoxville Russellville, Arkansas 72801  
 Phone (479) 968-6767 Fax (479) 968-1956  
 www.eegonline.com

November 12, 2019  
 Control No. 239548  
 Page 3 of 4

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

**ANALYTICAL RESULTS**

AIC No. 239548-1

Sample Identification: L1118-055718 1119008 Outfall 002 31-Oct-2019 1415

Analyte	Result	RL	Units	Qualifier
COD HACH 8000	16	10	mg/l	
	Prep: 07-Nov-2019 1430 by 347	Analyzed: 08-Nov-2019 1130 by 347	Batch: W69826	
Total Suspended Solids USGS I 3765 85	10	10	mg/l	
	Prep: 06-Nov-2019 1036 by 347	Analyzed: 07-Nov-2019 1555 by 347	Batch: W69800	

AIC No. 239548-2

Sample Identification: L1118-055718 1119009 Outfall 002 31-Oct-2019 1415

Analyte	Result	RL	Units	Qualifier
Oil and Grease EPA 1664A	< 5	5	mg/l	
	Prep: 06-Nov-2019 1014 by 346	Analyzed: 06-Nov-2019 1723 by 346	Batch: B11630	





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November 12, 2019  
 Control No. 239548  
 Page 4 of 4

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
Total Suspended Solids	239575-1	< 10 mg/l			06Nov19 1036 by 347	07Nov19 1555 by 347		
	Batch: W69800 Duplicate	< 10 mg/l	0.00	20.0	06Nov19 1037 by 347	07Nov19 1555 by 347		
Total Suspended Solids	239583-1	22 mg/l			06Nov19 1036 by 347	07Nov19 1555 by 347		
	Batch: W69800 Duplicate	22 mg/l	0.00	20.0	06Nov19 1037 by 347	07Nov19 1555 by 347		

**LABORATORY CONTROL SAMPLE RESULTS**

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	100 mg/l	104	85.0-115			W69826	07Nov19 1431 by 347	08Nov19 1130 by 347		
Oil and Grease	40 mg/l	93.0	78.0-114			B11630	06Nov19 1014 by 346	06Nov19 1723 by 346		
	40 mg/l	98.5	78.0-114	5.74	20.0	B11630	06Nov19 1014 by 346	06Nov19 1723 by 346		

**MATRIX SPIKE SAMPLE RESULTS**

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	239553-1	100 mg/l	111	80.0-120	W69826	07Nov19 1431 by 347	08Nov19 1130 by 347		
	239553-1	100 mg/l	106	80.0-120	W69826	07Nov19 1431 by 347	08Nov19 1130 by 347		
	Relative Percent Difference:			4.52	10.0	W69826			

**LABORATORY BLANK RESULTS**

Analyte	Result	RL	LOQ	QC Sample	Preparation Date	Analysis Date	Qual
COD	< 10 mg/l	10	10	W69826-1	07Nov19 1431 by 347	08Nov19 1130 by 347	
Total Suspended Solids	< 10 mg/l	10	10	W69800-1	06Nov19 1037 by 347	07Nov19 1555 by 347	
Oil and Grease	< 2.0 mg/l	2.0	5	B11630-1	06Nov19 1014 by 346	06Nov19 1723 by 346	



220 North Knoxville Russellville, Arkansas 72801  
 Phone (479) 968-6767 Fax (479) 968-1956  
 www.eegonline.com

Client: Eco Vista Landfill  
 Date of Sample: 10/31/19  
 Time of Sample: 1415  
 Date Received: 11/1/19  
 Sample Collected From: Outfall 002  
 Sample Collected By: Jodi Reynolds  
 Sample Matrix: Water

Job Number: L1118-055718  
 Date of Report: 11/9/19  
 P.O. Number: Not Given  
 Control Number: 1119008  
 Sample I.D.: Outfall 002  
 Delivered By: J. Reynolds

**ANALYSIS REPORT**


Parameter	Init.	Date	Time	Concentration	Units	Method
pH	SC	11/1/19	1521	7.8		4500H+ *


**QUALITY CONTROL**

Parameter	Orig. Value	Dup. Value	Rel. % Difference
pH	7.34	7.35	0.14

All instruments have been calibrated on a daily basis. Each day, Quality Control procedures have been performed on 10% of all analysis.

*\* Approved by Standard Methods Committee, 2011.*

  
 \_\_\_\_\_  
 Reviewed by

  
 \_\_\_\_\_  
 Reviewed by



**OUTFALL MODIFICATION FORM**

The enclosed form may be used to request modifications of outfalls covered under NPDES general permit ARR000000 for discharges of stormwater associated with industrial activity (except from construction activity). The numbering of outfalls should be sequential and begin with Outfall 001 (i.e. if Outfall 001 is deleted, Outfall 002 will become Outfall 001).

**Attach additional pages to modify more than one outfall.**

Outfall Modification Type: Add (Skip Section II)  Remove (Skip Section III)  Move

Permit Tracking No. ARR00 0231 AFIN: 72-00144

**I. FACILITY INFORMATION:**

Permittee: Eco-Vista, LLC Contact Name: Jodi Reynolds  
Facility Name: Eco-Vista, LLC Phone Number: 501-993-8966  
Facility City: Springdale Zip: 72762 Email Address: jreyno10@wm.com  
Mailing Address: 2210 Waste Management Drive  
City: Springdale State: AR Zip: 72762

**II. CURRENT OUTFALL INFORMATION:**

Outfall: 001  
Outfall Latitude: 36 degrees 7 minutes 53.2 seconds  
Outfall Longitude: -94 degrees 15 minutes 7.7 seconds  
Receiving Stream: Unnamed tributary of Little Wildcat Creek thence into Clear Creek then to Illinois River

**III. NEW OUTFALL INFORMATION:**

Outfall: 004 (Note: Outfall 001, 002, 003 are permitted under ARG160045)  
Outfall Latitude: 36 degrees 8 minutes 12.2 seconds  
Outfall Longitude: -94 degrees 14 minutes 53.8 seconds  
Receiving Stream: Unnamed tributary to Little Wildcat Creek thence into Clear Creek then to Illinois River

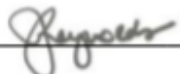
**IV. CONSULTANT INFORMATION (if applicable):**

Consultant Contact Name: Bryan Bailey Company: Promus Engineering  
Consultant Phone Number: 870-391-1543 Email Address: bbailey@promusengineering.com

**V. SIGNATORY REQUIREMENTS:**

"I certify under penalty of law that this document and all attachments were prepared under my direction, or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Responsible/Cognizant Official Printed Name: Jodi Reynolds Title: EP Manager

Responsible/Cognizant Official Signature:  Date: 4/13/2020

**ATTACH A SITE MAP SHOWING THE NAME AND LOCATION OF EVERY OUTFALL THAT WILL BE COVERED UNDER YOUR EXISTING GENERAL PERMIT AFTER THIS MODIFICATION.**

**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](#)

---

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

---

**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.: ARR000231**

Dear Ms. Reynolds:

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

1. **Report Item 1:** Outfall 004 is the only outfall associated with this permit. During the inspection it was noted that the site map indicates that only the maintenance area and leak detection system drain to Outfall 004, whereas the Hauling Company Area and unused storage bins drain to separate locations. Your response states that the Hauling Company Area drains to Outfall 003A. Even though this outfall is associated with a separate stormwater permit (ARG160045), since areas covered under the Industrial General Stormwater Permit (IGP, ARR000231) discharge to Outfall 003 this outfall must be covered under the IGP. This also applies to stormwater runoff from the Landfill Gas to Energy Plant to Outfall 002A.

If the possible pollutants located in the Hauling Company Area and Landfill Gas to Energy Plant are similar to the Maintenance Area, then Waste Management of Arkansas can declare these outfalls similar and only draft an annual report for Outfall 004. However, quarterly and comprehensive inspections must be conducted at each outfall.

2. **Report Item 3:** Your response states that Eco-Vista is considered a subsector L1 industry and is therefore only required to sample for pH, TSS, and COD. However, Eco-Vista is also secondarily classified secondarily as a P1 industry (Trucking without storage) and is therefore required to sample Oil and Grease.
3. **Report Item 6:** Please submit photographs of the rock check dams.
4. **Report Item 8:** Please submit photographs of the remediated area and repaired equipment.

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". The signature is written in a cursive style and is contained within a thin blue rectangular border.

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 DEQ-ARR000231  
**Date:** Tuesday, May 4, 2021 11:37:44 AM  
**Attachments:** [EVLF - ARR 2020 Response to Inspection Response.pdf](#)  
[image001.png](#)  
[image002.png](#)

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Melissa,

Attached is a response from Waste Management of Arkansas regarding the October 1, 2020, Industrial Stormwater inspection at the Eco-Vista Landfill (PDS 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:** Friday, April 23, 2021 11:48 AM  
**To:** Grimes, Garrett  
**Subject:** Response to DEQ-ARR000231

Hello! Attached please find our response to your letter dated March 3, 2021. Thank you for allowing us an extra week to prepare the response. As you will see, we are engaging our consultants to assist us with a permit modification request for the first two items. Once they have the documentation together, I will copy you on the submittal to the Water Divisions, Permits Section.

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

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 ARR000231  
Response to ADEQ NPDES Inspection – Class 1/Class 4

Dear Mr. Grimes:

As requested in your letter dated March 3, 2021, following are responses to our Response to Inspection dated December 16, 2021. Your comments are listed first in **bold** print followed by a response from Eco-Vista, LLC.

**Comment: Outfall 004 is the only outfall associated with this permit. During the inspection it was noted that the site map indicates that only the maintenance area and leak detection system drain to Outfall 004, whereas the Hauling Company Area and unused storage bins drain to separate locations. Your response states that the Hauling Company Area drains to Outfall 003A. Even though this outfall is associated with a separate stormwater permit (ARG160045), since areas covered under the Industrial General Stormwater Permit (IGP, ARR000231) discharge to Outfall 003 this outfall must be covered under the IGP. This also applies to stormwater runoff from the Landfill Gas to Energy Plant to Outfall 002A.**

If the possible pollutants located in the Hauling Company Area and Landfill Gas to Energy Plant are similar to the Maintenance area, then Waste Management of Arkansas can declare these outfalls similar and only draft an annual report for Outfall 004. However, quarterly and comprehensive inspections must be conducted at each outfall.

Response: Eco-Vista is currently assessing the possible pollutants in the hauling company and landfill gas to energy plant to determine if they can be considered similar to the landfill discharges. We are engaging a consultant to help with the determination and submittals to DEQ.

**Comment: Your response states that Eco-Vista is considered a subsector L1 industry and is therefore only required to sample for pH, TSS and COD. However, Eco-Vista is also secondarily classified secondarily as a Pi industry and is therefore required to sample Oil and Grease.**

Response: According to our permit issued by DEQ on June 9, 2020, Eco-Vista is classified as a subsector L1 facility. There is no reference to a subsector P1 facility on the Notice of Coverage, which is why oil and grease were not sampled in 2020. Eco-Vista Landfill has engaged a consultant to help prepare a revised Notice of Coverage for the stormwater permit to include a secondary classification as a P1 industry.

**Comment: Please submit photographs of the rock check dam.**

Response: Please see attached photo log.

**Comment: Please submit photographs of the remediated area and repaired equipment.**

Response: Please see attached photo log.

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". The signature is written in a cursive, flowing style.

Jodi Reynolds

Environmental Protection Manager – Arkansas



Repaired  
Pump



- Rock Check Dams





- Old Shop





- New Shop



# ARKANSAS

## ENERGY & ENVIRONMENT

July 22, 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.: ARR000231**

Dear Ms. Reynolds:

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

1. **Report Item 1:** The response states that Eco-Vista is currently assessing the possible pollutants in the hauling company and landfill gas to energy plant to determine if they can be considered similar to the landfill discharge. Please note that the outfalls permitted under permit # ARG160045 are for the discharge of uncontaminated stormwater from landfills and would therefore not cover stormwater discharges from separate industrial activity. Therefore, stormwater discharges from the hauling company and gas to energy plant will need to be permitted under permit # ARR000231 and associated with their own stormwater outfalls. These outfalls should be where stormwater leaves the industrial area or where it is discharged from an associate BMP structure. If discharges from these additional outfalls are determined to be similar to other outfalls monitored under Permit # ARR000231, such as the maintenance area, then Waste Management can declare these outfalls similar. Please submit notification the Outfall Modification form has been submitted for review.
2. **Report Item 3:** Your response states that there is no reference of the P1 Industrial classification in the permit, and indicate a consultant has been engaged to help prepare a revised NOI to include secondary classification as a P1. Please submit notification that the revised NOI has been submitted.

Please be aware that a 2010 Renewal NOI submitted by Waste Management of Arkansas for this permit notes SIC codes 4953 for waste refuse systems and 4212 for local trucking without storage. Industries associated with the SIC Code 4212 are classified as P1 industries. This code is associated with this permit in the DEQ's Permit Database System. If these codes are no longer accurate, then

**ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT**

Waste management of Arkansas should contact the DEQ Office of Water Quality  
– Permits Branch to address the discrepancy.

This work/documentation should be completed/submitted as soon as possible. Please provide the information no later than **August 12, 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". The signature is written in a cursive style and is contained within a thin blue rectangular border.

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





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

August 11, 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 ARR000231  
Response to ADEQ NPDES Inspection – Class 1/Class 4

Dear Mr. Grimes:

As requested in your letter dated July 22, 2021, following are responses to our Response to Inspection dated December 16, 2021. Your comments are listed first **in bold** print followed by a response from Eco-Vista, LLC.

**Report Item 1: The response states that Eco-Vista is currently assessing the possible pollutants in the hauling company and landfill gas to energy plant to determine if they can be considered similar to the landfill discharge. Please note that the outfalls permitted under permit ARG160045 are for the discharges of uncontaminated stormwater from landfills and would therefore not cover stormwater discharges from separate industrial activity. Therefore, stormwater discharges from the hauling company and gas to energy plant will need to be permitted under permit ARR000231 and associated with their own stormwater outfalls. These outfalls should be where stormwater leaves the industrial area or where it is discharged from an associate BMP structure. If the discharges from these additional outfalls are determined to be similar to other outfalls monitored under permit ARR000231, such as the maintenance area, then Waste Management can declare these outfalls similar. Please submit notification the Outfall Modification form has been submitted for review.**

Response: Our consultant, Promus Engineers, contacted the permitting section of the Water Division for clarification on this matter. According to permitting, separate outfalls are not required since the stormwater runoff is channeled to our stormwater ponds and discharged through ARG permitted outfalls. This seems to be a complex matter and WM requests a conference call or meeting with permitting and compliance to clarify what is required when a site is regulated by two NPDES permits, as this will affect landfills we own in Jefferson, Yell and Pulaski Counties, as well as landfills across Arkansas.

**Comment: Your response states that there is no reference of the P1 Industrial classification in the permit, and indicates a consultant has been engaged to help prepare a revised NOI to include secondary classification as a P1. Please submit notification that the revised NOI has been submitted.**

Response: Per discussion with the permitting section of the Water Division, the P1 classification can be added without submittal of a new NOI. Please see attached e-mail correspondence.

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, appearing to read 'Jodi Reynolds'.

Jodi Reynolds  
Environmental Protection Manager – Arkansas



**From:** [Khan, Faizan](#)  
**To:** [Reynolds, Jodi](#)  
**Subject:** [EXTERNAL] RE: Eco-Vista, LLC - ARG160045 & ARR000231  
**Date:** Wednesday, August 11, 2021 2:05:42 PM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image002.png](#)  
[image003.png](#)

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Hi Jodi,

I let our stormwater engineer supervisor, Jessica Sears, know this. She asked me to inform you that we can take a look at adding the P1 industrial classification to the IGP based on this email correspondence, so a new NOI won't be needed at this time. After everything's reviewed and approved, an updated Notice of Coverage (NOC) for the permit should be issued and sent out.

Hope that helps.

**Faizan Khan** | Engineer

**Division of Environmental Quality | Office of Water Quality**  
**NPDES Permits Section**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0670 | e: [faizan.khan@adeq.state.ar.us](mailto:faizan.khan@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** Reynolds, Jodi [<mailto:jreyno10@wm.com>]  
**Sent:** Wednesday, August 11, 2021 12:13 PM  
**To:** Khan, Faizan  
**Subject:** FW: Eco-Vista, LLC - ARG160045 & ARR000231

Hello, Faizan! I have one more question related to our stormwater inspection. Do I need to submit a new NOI to add the P1 industrial classification to our permit? Or since it is already listed as P1 in the DEQ database, as stated in Garrett's letter, is the NOI necessary? Please see most recent inspection correspondence and our permit. 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