

From: [Sears, Jessica](#)
To: [Jain, Anmol](#)
Cc: [Khan, Faizan](#); [Burrow, Kealey](#)
Subject: Re: Eco-Vista, LLC - ARG160045 & ARR000231
Date: Wednesday, August 11, 2021 1:54:23 PM
Attachments: [image002.png](#)
[image003.png](#)
[image001.png](#)

We will need to route through eportal because we have to send them a new NOC. I think we should be adding P1, not replacing. Faizan can you please let Jodi know that we can take a look at this based on the email, and a new NOI is not needed at this time?

Kealey can you please get an eportal record going for this when you have a chance? If it's soon-ish, it can be assigned to Anmol because this won't take very much time at all.

From: Jain, Anmol
Sent: Wednesday, August 11, 2021 1:49 PM
To: Sears, Jessica
Cc: Khan, Faizan
Subject: Re: Eco-Vista, LLC - ARG160045 & ARR000231

Access has L1. I'll update it to P1 now.

Anmol Jain | Engineer
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0626 | e: anmol.jain@adeq.state.ar.us

From: Sears, Jessica
Sent: Wednesday, August 11, 2021 1:45 PM
To: Jain, Anmol
Cc: Khan, Faizan
Subject: Re: Eco-Vista, LLC - ARG160045 & ARR000231

Anmol can you please confirm that our database has P1? I don't see that on the recertification or on their NOC. I'm still unable to get on vpn, so i can't open the database.

From: Khan, Faizan
Sent: Wednesday, August 11, 2021 1:22 PM
To: Sears, Jessica
Cc: Jain, Anmol
Subject: FW: Eco-Vista, LLC - ARG160045 & ARR000231

Hey Jessica, Jodi has another question below on the stormwater inspection.

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

C: 479.699.1475
88 Joyce Lane
Russellville, AR 72802



From: Bryan Bailey <bbailey@promusengineering.com>
Sent: Thursday, August 5, 2021 3:33 PM
To: Reynolds, Jodi <jreyno10@wm.com>
Cc: Conrad, David <DConrad@wm.com>
Subject: [EXTERNAL] FW: Eco-Vista, LLC - ARG160045 & ARR000231

Jodi,

See correspondence below. Based on Faizen's responses, I think Garrett Grimes requests in the response to inspection letters (114271-Inspection) are incorrect, so a revised NOI and additional permitted (interior) outfalls should not be necessary. I will be reaching out to Jessica Sears (ARR00 Permit Engineer) to confirm. Please let me know if you have any comments or questions.

Bryan W. Bailey, PE
Senior Engineer | Promus Engineering, LLC
M: (870) 391-1543
bbailey@promusengineering.com
www.promusengineering.com

From: Khan, Faizan <Faizan.Khan@adeq.state.ar.us>
Sent: Thursday, August 5, 2021 1:53 PM
To: Bryan Bailey <bbailey@promusengineering.com>
Subject: RE: Eco-Vista, LLC - ARG160045 & ARR000231

Bryan,

If the stormwater runoff will be routed to the facility's sedimentation pond and then discharged through the ARG16-permitted outfalls, that would be fine. As you said, the ARG16 has more stringent requirements than the IGP anyway.

Is the intention to see if the facility can cover everything through the existing ARG16 permit, and then look into terminating the IGP coverage?

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



ARKANSAS
ENERGY & ENVIRONMENT

From: Bryan Bailey [<mailto:bbailey@promusengineering.com>]
Sent: Thursday, August 5, 2021 8:55 AM
To: Khan, Faizan
Subject: RE: Eco-Vista, LLC - ARG160045 & ARR000231

Thank you Faizan! One last clarification/question.

Please see Report Item 1 from the Response to Inspection - letter dated July 22, 2021 (page 41) of inspection report 114271. The facility's primary industrial activity is landfill (and related landfill activities) and has been operating since the 70/80's or so. That being said, the existing stormwater management system for almost the entire facility has always routed runoff through the facility's existing sedimentation ponds (via sheet flow to drainage swales or channels to letdowns to perimeter ditches) and that includes the three (3) currently ARG16 permitted outfalls/sedimentation ponds. The existing stormwater management system was designed for the entire facility, if "interior"/internal outfalls are required then we could potentially be removing effective stormwater controls/sediment controls/BMPs (e.g. existing sed/stormwater ponds) from the smaller interior drainage areas.

- So can areas associated with the landfill (borrow area, equipment maintenance area, roll off container storage area, scales/scale house, employee parking, etc.), basically areas that are not within the permitted landfill footprint but are a part of the landfill

facility, can the stormwater runoff from these areas be discharged through ARG16 outfalls? The ARG16 is more stringent than requirements of the ARRO0 permit in regard to Landfill Sector (L2).

Thank you in advance.

Bryan W. Bailey, PE

Senior Engineer | Promus Engineering, LLC

M: (870) 391-1543

bbailey@promusengineering.com

www.promusengineering.com

From: Khan, Faizan <Faizan.Khan@adeq.state.ar.us>
Sent: Thursday, August 5, 2021 8:19 AM
To: Bryan Bailey <bbailey@promusengineering.com>
Subject: RE: Eco-Vista, LLC - ARG160045 & ARR000231

Bryan,

It's all good. To answer your question in bold: no, the permitted ARG16 outfall doesn't also have to be permitted under the IGP.

As to any stormwater questions, they can be directed to Ms. Jessica Sears, P.E. (Jessica.Sears@adeq.state.ar.us). More information and contacts can also be found on the General Stormwater Permits webpage located here: <https://www.adeq.state.ar.us/water/permits/npdes/stormwater/>

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



ARKANSAS
ENERGY & ENVIRONMENT

From: Bryan Bailey [<mailto:bbailey@promusengineering.com>]
Sent: Monday, August 2, 2021 1:50 PM
To: Khan, Faizan
Subject: RE: Eco-Vista, LLC - ARG160045 & ARR000231

Faizan - Thank you for looking into this and responding so quickly. Apologies in advance, I probably

should have reached out to DEQ contacts for Stormwater Industrial General Permit (IGP) since most of my questions/comments involve the IGP (ARR00) based on the inspection reports. And I'll probably follow up with them as well, but I wanted to begin with the ARG16 requirements.

- Please see Report Item 1 from the Response to Inspection - letter dated March 3, 2021 (page 31) of inspection report 114271. **Does an ARG160045 permitted Outfall (001A, 002A and 003A) need to be permitted under the IGP (ARR00) as well?** My understanding was stormwater discharges covered by another permit (in this case ARG1600) and discharges subject to effluent limitations could not be covered by the IGP (ARR00). If this isn't the case and the same outfalls need to be covered by both permits, then I don't have any additional comments/questions in regard to "interior"/internal outfalls requirements.

Bryan W. Bailey, PE

Senior Engineer | Promus Engineering, LLC

M: (870) 391-1543

bbailey@promusengineering.com

www.promusengineering.com

From: Khan, Faizan <Faizan.Khan@adeq.state.ar.us>

Sent: Monday, August 2, 2021 10:41 AM

To: Bryan Bailey <bbailey@promusengineering.com>

Subject: Eco-Vista, LLC - ARG160045 & ARR000231

Good morning Bryan,

I'm getting back to you based on our phone call on Thursday of last week regarding Eco-Vista, LLC's permits.

The inspection report for ARG160045 I've looked at is the one dated October 1, 2020, linked here for reference:

<https://www.adeq.state.ar.us/downloads/WebDatabases/InspectionsOnline/114270-insp.pdf>

The inspection report for the stormwater permit, ARR000231, is linked here:

<https://www.adeq.state.ar.us/downloads/WebDatabases/InspectionsOnline/114271-insp.pdf>

I do see that Jodi provided responses on December 15, 2020 to address each of the points listed in the summary of findings of the ARG16 permit inspection report. Was there a specific point in either of these reports that the facility is currently trying to address, particularly to do with the internal outfalls that you mentioned in our discussion?

Thanks,

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



ARKANSAS
ENERGY & ENVIRONMENT