



**WASTE MANAGEMENT**

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May 1, 2003

Steve Martin  
Chief, Solid Waste Management Division  
Arkansas Department of Environmental Quality  
8017 I-30, P.O. Box 8913  
Little Rock, AR 72219-8913

**BWD#** 19878  
**To:** SS

**REC'D** XC SM7GL7708  
MAY 01 2003

**Pmt #** 0023-SG-TSW  
**AFIN:** 72-00144

**Subject: Financial Assurance Documentation (Reg. 22.906)  
Tontitown Transfer Station (Waste Management)  
AFIN: 72-00144 Permit No: 0023-SG-TSW**

Dear Mr. Martin:

The Tontitown Transfer Station is permitted from the Arkansas Department of Environmental Quality and in accordance with *Chapter Nine – Transfer Stations of Regulation 22*.

In determining whether financial assurance documentation is required, *Regulation 22.906-Financial Assurance* states that the ADEQ will consider: 1) the facility size and risk of contamination, and 2) the risk of the owner/operator becoming financially incapacitated to where the amount of solid waste and recoverable material (150% of the maximum permitted amount) ever stored onsite can be transported and disposed of in a Class 1 landfill.

The Tontitown Transfer Station is owned and operated by Waste Management of Arkansas (WMA). A Request for Solid Waste Permit Name Change was submitted to the ADEQ on April 30, 2003.

WMA has numerous permitted landfills (4), transfer stations (5) and composting facilities (3) within Arkansas. WMA has been an operating entity within the State for almost 20 years. WMA has on record with the ADEQ other financial assurance documents totaling more than \$14,000,000. In addition, our current corporate disclosure statement (Form 10-Q) is on file with the Department.

The Tontitown Transfer Station is not currently handling any waste at this time. In accordance with a letter from the ADEQ dated April 24, 2003, the facility will not handle waste until certain conditions are met; the referenced Request for Name Change being one of these conditions. There is no residual waste or debris within the facility; there is an enclosed building and the risk of environmental contamination is considered remote.

*Page 2*  
*Tontitown Transfer Station*  
*Financial Assurance Documentation*  
*May 1, 2003*

For these reasons, we request that a determination be made that site-specific financial assurance documentation for the Tontitown Transfer Station not be required for the year 2003. Based on continued performance and regulatory compliance, this request will be resubmitted for 2004 and subsequent years as needed.

If you should require any additional information, or if there are any questions about this, please feel free to contact me at (501) 982-7336.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Dunbar". The signature is written in a cursive style with a large initial "J" and "D".

James E. Dunbar, P.E.  
Division Engineer

Copy: Susan Speake, ADEQ  
Tontitown Transfer Station Files