



ECO-VISTA LANDFILL, LLC
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February 24, 2010

Mr. Bryan Leamons, PE
Engineering Supervisor
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Subject: **Financial Assurance Documentation for 2010 (Reg. 22.906)**
AFIN: 72-00144
Waste Management Eco-Vista Transfer Station - Permit No: 0023-SG-TSW
Waste Management Eco-Vista Composting Facility - Permit No: 0013-SCYW-MC

Dear Mr. Leamons:

The Waste Management Eco-Vista Transfer Station (EVTS) and Compost Facility (EVCF) have previously had a waiver from the requirements for financial assurance in accordance with *Chapter Nine—Transfer Stations* (Reg. 22.906) and *Chapter Eight-Composting Facilities* (Reg. 22.810) 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.

There has been no change to the status of the permitted facilities. All permit fees have been paid to date, and all compliance inspections are satisfactory for both facilities. The EVTS is not currently handling any waste at this time and the risk of environmental contamination is considered remote from either facility. EVTS and EVCF are located at the Eco-Vista Landfill so should there ever be an issue with residual waste, the volume can easily be transferred to the active landfill where there is full financial assurance.

For these reasons, we request that a re-determination be made that site-specific financial assurance documentation for EVTS and EVCF not be required for the year 2010. Based on continued performance and regulatory compliance, this request will be resubmitted for 2011 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 cursive script that reads 'Lisa Rotenberry'.

Lisa Rotenberry
Market Area Environmental Protection Manager

Copy: Susan Speake, ADEQ
Eco Vista POR