

November 5, 2010

Mr. Justin Sparrow Solid Waste Management Division Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118

NOV - 5 2010

KN 3:39

RE: RE: Q3-2010 Routine Facility Inspection WM Eco-Vista Landfill Solid Waste Permit #00013-SW-CYW AFIN # 72-00144

Dear Mr. Sparrow

Waste Management Eco-Vista Landfill's (EVLF) response to noted deficiency(s) identified during your routine facility inspection dated September 20, 2010 are as follows:

Category 1 - Conform to operations narrative/plan 22.805(b)(2);(c)(6):

 TTLF has submitted a revised operating plan for the compost facility (see Attachment 1). The revised plan accurately reflects the current operations and the applicable sections of Regulation 22, Chapter 8.

We trust that this will adequately address Arkansas Department of Environmental Quality (ADEQ's) Q3-2010 inspection report findings for the above referenced facility. If you should have any questions or require additional information, please call at (501) 982-7336.

Sincerely, Waste Management

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Lisa Rotenberry Environmental Protection Manager

Attachment 1 – Dated Revised Operating Plan

AFIN: 72-0014 Pmt # 0013 - SCYW MC REC'D NOV 08 2010 Doc ID#:_

cc: Tontitown Landfill POR

Attachment 1 – Dated Revised Operating Plan

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ECO-VISTA LANDFILL, LLC 2210 Waste Management Drive Springdale, AR 72762 Office: (479) 361-2069 Fax: (479) 361-5934

October 18, 2010

OCT 1 9 2010

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

4:00Pm

Subject: Revised Operating Plan – Type Y Compost Facility Waste Management Eco-Vista Composting Facility Permit No: 0013-SCYW-MC AFIN: 72-00144

Dear Mr. Leamons:

Shepherd Engineering Design Co. Inc (SEPCo), on behalf of Waste Management Eco-Vista Compost Facility (EVCF) has modified the Operating Plan related to operations at the compost facility. The changes accurately reflect the current operations and the applicable sections of Regulation 22, Chapter 8.

EVCF requests your approval of the attached document.

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,

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Lisa Rotenberry Market Area Environmental Protection Manager

Copy: Eco Vista POR

AFIN: 72-00144 Pmt # 0013 - SCYW-MC RECTD SCAN DCT 1 9 2010 W M Doc.10# 58455 io BL 7 rule

ECO VISTA COMPOST FACILITY ECO VISTA CLASS I LANDFILL, LLC Permit No.: 0013-SG-CYWA

UPDATED OPERATING PLAN

September 26, 2010

Prepared For: Mr. Kirby Thompson Eco Vista Compost Facility Eco Vista Class I Landfill, LLC 2210 Waste Management Drive Springdale, AR 72762



Prepared by: Shepherd Engineering Design Co., Inc. 4000 North Classen Blvd. Suite 110-S Oklahoma City, OK 73118 SEDCo Project No.: 10010025





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OPERATING PLAN For The ECO VISTA LANDFILL COMPOST FACILITY (TYPE Y)

Revised September 2010

This Operating Plan has been prepared to meet the requirements of Arkansas Regulation 22.803-Location Restrictions and Siting Requirements, 22.805-Operational Requirements, 22.806-Design Requirements and 22.808-Recordkeeping Requirements.

The Compost Facility at the Tontitown Landfill Facility is an existing permitted operation (Permit No. 0013-SG-CYWA).

Operational Requirements:

- The compost facility is designed and operated in a manner that will not restrict the flow of the base flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste (the facility is not located in a floodway or floodplain). The compost facility is not located in a wetland as per the location restriction demonstration in the original approved application, dated December 1996. (Reg.22.803-a-2)
- 2. The compost facility is located at least 50-feet from the property boundary and at least 200-feet from an existing residence, place of business, or drinking water supply. See the attached Site Map. (Reg.22.803-a-5)
- 3. The compost facility is not located in an area where the seasonal high ground water is less than 24 inches from the ground surface or where bedrock lies less than 24 inches below the ground surface. (Reg.22.803-b)
- 4. The composting facility will be conducted in a manner to restrict pollution, public health hazards, nuisances, odors, and the harborage of vectors. (Reg.22.805-a-1)
- 5. Operation of the compost facility will follow acceptable methods of composting to result in aerobic biochemical degradation of the organic material.
- The composting operation will be performed by a licensed on-site operator (certified in accordance with Regulation 27) during all hours of operation; access to the compost facility shall be prohibited during non-operating hours. (Reg.22.805-a-3)

- The anticipated waste quantity will be approximately 500 cubic yards per month. This amount will fluctuate during the course of any year, as season collection of yard waste and green waste increases or decreases. (Reg.22.804-b-8-i)
- 8. The designated person in control of the compost facility is the Site Manager, who is also responsible for the operation and maintenance of the facility.
- 9. All waste material designated for the compost facility will be weighed at the scale for the landfill. Only waste materials designated as yard waste or other vegetative materials (such as grass clippings, leaves, shredded or chipped brush, tree prunings) and non-treated wood debris from home construction and demolition will be allowed at the compost facility. No municipal solid waste will be allowed.(Reg.22.802-a-1)
- 10. The compost facility will be monitored for unacceptable materials that may be commingled with the yard waste or non-treated wood debris. All vehicles will be processed through the landfill scale entrance area. The initial screening of waste and wood debris will be performed by the scale house attendant. Any waste items not suitable for composting and wood debris that is treated lumber will be removed and taken to the Class 1 or Class 4 landfill (Tontitown Landfill Facility) for disposal.(Reg.22.801-c)
- 11. The access road to the compost facility will be marked. The volume of traffic is not sufficient to warrant a two-lane roadway. There is sufficient unloading area to accommodate more than one vehicle at a time. (Reg.22.804-b-5-ii)
- 12. The compost facility will be operated to reduce odors. The waste materials will be processed in a timely manner such that foul odors do not occur. The site is also located away from residential areas such that any odors should not be a nuisance. As the compost material is curing, additional turning of the piles may be performed to reduce odors.(Reg.22.805-a-1)
- 13. The non-treated wood debris that is collected from home construction and demolition will be stored onsite and ground once per quarter. The resulting wood chips will be mixed with other composted materials and used as daily cover for the landfill located on the property.
- 14. The compost facility is located next to an on-site stormwater collection pond. Any surface water run-off from the compost operations will be directed to this pond.

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Operating Plan Eco Vista Compost Facility Eco Vista Class I Landfill, LLC

All drainage from this pond flows to an NPDES-designated discharge point. In the event of a discharge from the NPDES, samples will be taken and tested in accordance with the facility NPDES permit. (Reg.22.808-a-1)

- 15. The facility will be operated to reduce impacts from vectors, dust and litter. The surrounding area will be kept cleaned and cleared to reduce habitat areas for vectors. The site has access to a water truck to reduce dust. In the event that litter becomes a concern, mobile litter control panels can be directed to catch windblown litter. The use of mobile litter fencing allows for changes in wind direction. (Reg.22.805-a-1)
- 16. At this time, the finished compost can be used for on-site and off-site purposes. For on-site purposes, finished compost can be used to enhance vegetative growth and limit erosion on slopes. It is anticipated that finished compost can also be made available to off-site users on a limited basis. (Reg.22.809)

Recordkeeping and Reporting:

The compost facility will maintain results of stormwater run-off and/or site discharges as a part of the Tontitown Landfill facility. In the event the landfill ceases to operate under an NPDES permit, the compost facility will obtain the necessary NPDES permit(s).

The compost facility will have an operating record which will include the following:

- A copy of the permit;
- Design drawings;
- Operating plan (and any modifications or revisions); and
- Department (ADEQ) correspondence. (Reg.22.808)

Design Requirements:

The following drawings and information are provided concarning the design of - the compost facility:

- 1. Flow diagram of the proposed processing steps.
- 2. The base of the composting area will have a surface constructed with on-site material. This material is sufficient to withstand heavy operating equipment.

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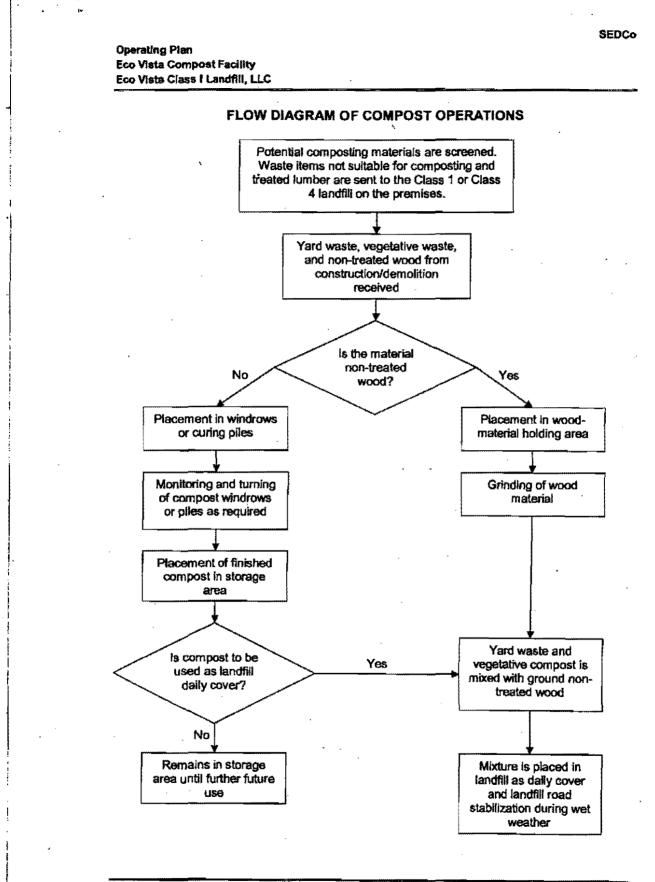
- 3. A site plan indicating the relative location of the compost facility and site contours; a site schematic plan indicating the approximate dimensions of the proposed receiving, processing, production, curing, and storage areas.
- 4. The site plan indicates associated roads, buildings, fences, gates, equipment, landscaping, utility lines, and drainage facilities. The property boundary of the Tontitown Landfill facility is fenced.
- 5. The site plan indicates stormwater runoff controls from the compost area. The compost area is situated on high ground where stormwater run-on should not be a concern.
- 6. Site access is controlled through the Tontitown Landfill facility. Vehicles may access the facility through the scale area, which is monitored by a scale-house attendant.
- 7. The storage area is designed to handle 6-months of finished compost product. In the event that additional area is needed, the Tontitown Landfill facility has sufficient land available. (Reg.22.806)

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