Mathews, Barbara

From:	Matoska, Maria
Sent:	Monday, December 27, 2010 8:34 AM
То:	Leamons, Bryan
Cc:	Mathews, Barbara
Subject:	FW: NOD for the Revised Operating Plan Eco-Vista, LLC Compost Facility
Attachments:	Operating Plan Updated 12-22-10.pdf; Compost Facility NOD Response Letter.pdf

-----Original Message----From: Jeff A. Shepherd [mailto:jashepherd@sedcousa.net]
Sent: Wednesday, December 22, 2010 4:11 PM
To: Matoska, Maria; Rotenberry, Lisa
Cc: Thompson, Kirby
Subject: RE: NOD for the Revised Operating Plan Eco-Vista, LLC Compost Facility

Attached is our response and the updated SOP for the Eco Vista Compost Facility. Thanks and have a great and safe holiday!!

Jeff A. Shepherd, P.E.

Senior Engineer/President Shepherd Engineering Design Co., Inc. 4000 North Classen Blvd., Suite 110-S Oklahoma City, OK 73118 (405) 996-5301 P (405) 488-0029 F

CONFIDENTIALITY NOTE:

This e-mail and any attachments are confidential and are protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of this e-mail or any attachment is prohibited. If you have received this e-mail in error, please notify us immediately by returning it to the sender and delete this copy from your system. Thank you for your cooperation.

 From: Matoska, Maria [mailto:MATOSKA@adeq.state.ar.us] Sent: Thursday, December 09, 2010 10:06 AM To: 'Rotenberry, Lisa' Cc: Jeff A. Shepherd Subject: FW: NOD for the Revised Operating Plan Eco-Vista, LLC Com- 	post Facility
Lisa,	Rec'd Digitally
Please forward to Kirby Thompson. I don't have his email address on	AFIN: 72-00144
Thanks,	PMT#: 0013-SCYW-MC
Maria	RECEIVED S By Barbara Mathews at 10:16 am, Dec 27, 2010 W
Original Message From: Mathews, Barbara Sent: Thursday, December 09, 2010 10:03 AM	DOC ID#: 58713
To: Matoska, Maria; Leamons, Bryan Cc: Sparrow, Justin	TO:MM> file

Subject: NOD for the Revised Operating Plan Eco-Vista, LLC Compost Facility



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

Updated December 16, 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



DESIGN COMPANY INCORPORATED

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

Revised December 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 Eco Vista Class I Landfill Facility is an existing permitted operation (Permit No. 0013-SCYW-MC).

Operational Requirements:

- 1. 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)
- 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 not 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 (Eco Vista Class I 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 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. 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)
- 14. 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)

15. 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 Eco Vista Class I 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 concerning 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.
- 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 Eco Vista Class I 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 Eco Vista Class I Landfill facility. Vehicles may access the facility through the scale area, which is monitored by a scale-house attendant.
- The storage area is designed to handle 6-months of finished compost product. In the event that additional area is needed, the Eco Vista Class I Landfill Facility has sufficient land available. (Reg.22.806)

FLOW DIAGRAM OF COMPOST OPERATIONS





Diagram Not to Scale



December 22, 2010

By Federal Express Priority Delivery

Arkansas Department of Environmental Quality Solid Waste Management Division 5301 Northshore Drive North Little Rock, AR 72118-5317

- Attn: Mr. Bryan Leamons, P.E. Engineering Supervisor
- RE: Response to Notice of Deficiency for Revised Operating Plan Eco Vista Compost Facility Waste Management of Arkansas, Inc. Tontitown, Arkansas ADEQ Permit No.: 0013-SCYW-MC AFIN: 72-00144 Document No.: 58621 Cross Reference No.: 58455 SEDCo Project No.: 10010025

Dear Sir:

This letter is in reference to the Notice of Deficiency (NOD) for the Revised Operating Plan for the Eco Vista Compost Facility received in this office on December 9, 2010. We have attached a revised Operating Plan to meet the requirements of the NOD.

We have revised the Operating Plan to remove any mention of accepting non-treated construction and demolition waste, storing this waste and grinding once per quarter. The only waste that will be accepted will be green waste such as grass clippings, leaves, shredded or chipped limbs or tree prunings.

Response to Notice of Deficiency Revised Operating Plan Eco Vista Compost Facility Waste Management of Arkansas, Inc. Tontitown, Arkansas ADEQ Permit No.: 0290-R2-S1 AFIN: 72-00144 Document No.: 58621 Cross Reference No.: 58455 SEDCo Project No.: 10010025

Please feel free to contact the undersigned or Ms. Lisa Rotenberry at Waste Management of Arkansas if you have any questions or comments.

Sincerely,

Shepherd Engineering Design Co., Inc.

Seo

Jeff Shepherd, P.E. Senior Engineer

Cc: Mr. Kirby Thompson – Eco Vista Class I Landfill Mr. David Conrad – Waste Management of Arkansas Ms. Lisa Rotenberry – Waste Management of Arkansas