



ARKANSAS
Department of Environmental Quality

September 22, 2011

Crews and Associates
Attn: Mr. Paul Phillips
521 President Clinton Avenue Suite 800
Little Rock, AR 72201

RE: Transfer of Solid Waste Permits to North Arkansas Board of Regional Sanitation
(NABORS)
Permit Numbers: 0249-S1-R2 and 0249-S4

Dear Mr. Phillips:

This letter serves as notification that North Arkansas Board of Regional Sanitation has requested the transfer of permits for the Class 1 and Class 4 Landfills located in Three Brothers, Arkansas. Permits are transferable provided that an administratively complete application is submitted. ADEQ received the permit transfer applications on September 8, 2011 and after review were deemed incomplete.

Attached are the letters sent to NABORS outlining the deficiencies regarding the transfer request. Once these deficiencies have been addressed and resolved, the permits will be transferred to the proposed permittee. ADEQ understands that deficiencies #1 and #3 can only be addressed after sale of the bonds.

If you have any questions, please call Bryan Leamons, P.E. of the Solid Waste Management Division Technical Branch at (501) 682-0602.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Lawrence", is written over a horizontal line.

Roger Lawrence
Chief, SWMD

cc: Jason Kincade, NABORS
Karen Bassett, Chief Deputy Director ADEQ

Enclosures-Notice of Deficiency Letters

ADEQ

ARKANSAS
Department of Environmental Quality

September 16, 2011

North Arkansas Board of Regional Sanitation
Attn: Mr. Jason Kincade
1305 Rossi Road
Mountain Home, AR 72653

RE: Notice of Deficiency-Request for Permit Transfer NABORS Class 1 Landfill
Permit Number: 0249-S1-R2 **AFIN: 03-00051**
Document Number: 60892 **Cross Reference Number: 60863**

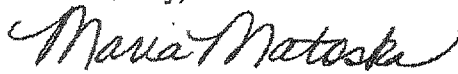
Dear Mr. Kincade:

The Arkansas Department of Environmental Quality-Solid Waste Management Division has received and reviewed the request to transfer to above reference permit to North Arkansas Board of Regional Sanitation. After review, the following deficiencies were noted:

1. Regulation 22.307(a)(3) requires adequate documentation from the current permittee that the proposed permittee shall have ownership or control of the site for which transfer of permit has been requested. The submittal did not include the appropriate documentation.
2. Disclosure statements are not required for governmental entities including federal, state, county, municipal or regional solid waste authorities. It is the Department's understanding that the proposed permittee will consist of two counties and a city, however, this information was not provided in the transfer request. Please provide information regarding the organization and structure of the proposed permittee and a copy of the local agreement.
3. Regulation 22.307(a)(5) requires the current and proposed permittees to provide documentation of adequate Financial Assurance in compliance with Chapter 14 of Regulation 22. This information was not provided in the submittal.

Please address the above deficiencies and submit the information requested. If you have any comments or questions, please contact me at (501) 682-0608.

Sincerely,



Maria Matoska
Permit Engineer



Bryan Leamons, P.E.
Engineer Supervisor

cc: Mayor Tim McKinney, Ozark Mountain Solid Waste District
Karen Bassett, Chief Deputy Director ADEQ
Roger Lawrence, Chief SWMD
Susan Speake, Programs Branch Manager SWMD
Gary Meador, District Field Inspector SWMD



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Department of Environmental Quality

September 16, 2011

North Arkansas Board of Regional Sanitation
Attn: Mr. Jason Kincade
1305 Rossi Road
Mountain Home, AR 72653

RE: Notice of Deficiency-Request for Permit Transfer NABORS Class 4 Landfill
Permit Number: 0249-S4 **AFIN: 03-00051**
Document Number: 60893 **Cross Reference Number: 60862**

Dear Mr. Kincade:

The Arkansas Department of Environmental Quality-Solid Waste Management Division has received and reviewed the request to transfer to above reference permit to North Arkansas Board of Regional Sanitation. After review, the following deficiencies were noted:

1. Regulation 22.307(a)(3) requires adequate documentation from the current permittee that the proposed permittee shall have ownership or control of the site for which transfer of permit has been requested. The submittal did not include the appropriate documentation.
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3. Regulation 22.307(a)(5) requires the current and proposed permittees to provide documentation of adequate Financial Assurance in compliance with Chapter 14 of Regulation 22. This information was not provided in the submittal.

Please address the above deficiencies and submit the information requested. If you have any comments or questions, please contact me at (501) 682-0608.

Sincerely,

Maria Matoska
Permit Engineer

Bryan Leamons, P.E.
Engineer Supervisor

cc: Mayor Tim McKinney, Ozark Mountain Solid Waste District
Karen Bassett, Chief Deputy Director ADEQ
Roger Lawrence, Chief SWMD
Scott McWilliams, Enforcement Coordinator SWMD
Gary Meador, District Field Inspector SWMD