

**West River Valley Solid Waste Management District
24087 Highway 64,
Clarksville, AR 72830**

August 28, 2016

Mrs. Becky W. Keogh, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive,
North Little Rock, AR 72118-4317

Re: CAO LIS 15-055 AFIN: 36-00484 and 36-00461 Permit Number: 0027-SWTP

Director Keogh,

Attached are the work plans and schedules for the removal of all waste tires at the Knoxville warehouse, and the permitted tire processing facility. Abatement activities have been underway to reduce the number of waste tires at both sites. Bear in mind, the activities at the processing facility require six to eight employees. We have, and will continue to recycle or process for disposal, all tires generated by the tire dealers within our district. The clean-up at both sites has to be scheduled around this service we provide to these dealers. Also, at times when our employees are working at the Knoxville warehouse, the processing equipment does not operate. For this reason, scheduling the labor force to work at the Knoxville warehouse has, to this point, been inconsistent.

On behalf of the Board of Directors of the West River Valley Solid Waste Management District, I would like to say thank you for the willingness ADEQ has shown to work with our District to remedy this situation.

Sincerely,

Justin Sparrow, Director
West River Valley Solid Waste Management District

cc: Judge Jimmy Hart, Chairman WRVSWMD Board of Directors
 Josh Hesselbein, Enforcement Analyst, ADEQ OLR
 Tammie Hynum, Senior Manager, Regulated Waste Programs, ADEQ OLR
 Lisa Thompson, General Council, ADEQ OLR

From: [Justin Sparrow](#)
To: [Hesselbein, Josh](#)
Subject: CAO LIS 15-055 Work Plan
Date: Sunday, August 28, 2016 9:09:31 PM
Attachments: [August 28 letter to Director Keogh.docx](#)
[Work plan- Knoxville.docx](#)
[Work plan schedule for the permitted waste tire processing facility operated by the West River Valley Solid Waste Management District.docx](#)

Josh,

I would like to bring a signed copy of this to deliver it to you later this week.

Thanks,

Justin Sparrow, Director

West River Valley Solid Waste District

479-754-7475

Work plan schedule for the permitted waste tire processing facility operated by the West River Valley Solid Waste Management District, located at 24087 Highway 64 in Clarksville, AR

Since July 5, 2016, the following actions have been completed at the permitted facility:

- Approximately thirty thousand tires that were piled around the facility have been processed for disposal, or recycled into tire derived fuel (TDF) or rubber mulch.

- Approximately seven hundred cubic yards of shredded truck tires (385 Tons) have been taken to the Ozark Ridge Landfill near Ola, AR for disposal.

- Approximately four hundred cubic yards of shredded truck tires (220 Tons) have been processed and staged on site, to be taken to the Ozark Ridge Landfill for disposal once funds become available.

- Approximately five thousand passenger tires (55 Tons) have been removed from the yard and recycled into rubber mulch.

- Mosquito abatement activities have been contracted, and the initial treatment was very successful in greatly reducing the population. Additional treatments are scheduled through October.

- The remaining outdoor tire piles are within the limits set by ADEQ Regulation 14.1402(C) These piles have been covered with plastic sheeting to prevent the accumulation of water.

- All equipment operation at this site have on-board fire extinguishers. Additionally, several more fire extinguishers are located around all work stations. The processing facility has fire extinguishing equipment installed at the time of construction.

At this time this facility is well under the maximum allowed limit of waste tires. (ADEQ Permit Number 0027-SWTP, Site Specific Permit Condition Number 4(a) allows 725 Tons.) At this time, I would estimate there to be 600 Tons of this material on site.

The tire processing facility staff generally has been working three days per week processing the waste tires delivered to the facility from tire dealers within the district. One day per week has been dedicated to clean-up activities of waste tires on the facility grounds. One day per week the employees perform maintenance on the processing equipment. However, we will be committing many more hours to the removal of the waste tires at the Knoxville site. Therefore, our progress to remove all waste tires from off the ground at our permitted facility may slow.

Going forward, we will continue to haul tire shreds to the landfill, and process tires off the ground. Each week we will remove 200 cubic yards of tire shreds (110 Tons) from the facility. At this rate, all tire piles will be removed by January 1, 2017.

Weekly reports detailing progress towards this goal will be submitted as required under Condition 13 of this order.