

Murillo, Kacy

Subject: RE: WM Eco-Vista Class 4 Landfill - Draft Permit Comments

----- Original message -----

From: "Conrad, David" <DConrad@wm.com>

Date: 9/2/22 9:53 AM (GMT-06:00)

To: "Cusher, Annette" <Cusher@adeq.state.ar.us>

Cc: "Reynolds, Jodi" <jreyno10@wm.com>

Subject: WM Eco-Vista Class 4 Landfill - Draft Permit Comments

AFIN: 72-00144

PMT#: 0290-S4-R1

Received

By Kacy Murillo at 8:09 am, Sep 6, 2022

DOC ID#: 82560

TO: AC>FILE <KM

Dear Ms. Cusher, attached is the comment letter from Eco-Vista, LLC regarding the draft permit. Should you have any questions, please call me at any time. Thank you.

Dave

DAVID CONRAD

Engineer

Mid★South Area

dconrad@wm.com

C: 501.804.0806

100 Two Pine Drive

North Little Rock, AR 72117



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Eco-Vista Landfill
2210 Waste Management Drive
Springdale, Arkansas 72762

September 2, 2022

Ms. Annette Cusher PE
Arkansas Department of Energy & Environment
Division of Environmental Quality – Office of Land Resources
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Dear Ms. Cusher,

**Subject: Eco-Vista Landfill – Class 4
Draft Permit Decision - Draft Permit #: 0290-S-R2; AFIN: 72-00144**

This letter is in response to the above-mentioned Draft Permit. With this letter Eco-Vista, LLC (EVLV) offers the following comments:

Site Specific Condition 1: Sheet 11 of 12 was not included in the list of approved permitted plans. Please clarify this omission.

Site Specific Condition 4: The condition references 'paper waste including cardboard' as being not authorized for acceptance at this facility. EVLV believes it would be difficult to control/enforce this restriction since paper wastes and cardboard are common wastes from construction and demolition projects. EVLV would ask that this language be removed from the permit.

Site Specific Condition 13: EVLV would ask that the condition be edited as follows:

- 1) The second sentence change to: 'The quality and quantity of leachate produced shall be monitored during the active life of the landfill and during the post-closure period.' EVLV believes this is an adequate condition and eliminates any ambiguity.
- 2) The fifth sentence change to: 'When and if the Class 4 facility begins to truck its leachate to an off-site disposal facility, EVLV will monitor on a quarterly basis the parameters noted in the following table.'

General Condition 29: Please change December 30 to December 31.

General Condition 31: Typographical error. The word 'practicable' should be replaced with 'practical'.

Should you have any questions, please contact me at 501-804-0806 or dconrad@wm.com. Thank you!

Eco-Vista, LLC

A handwritten signature in black ink that reads 'David K. Conrad'.

David K. Conrad
Engineer – Arkansas

CC: Carl Simmons, WM Senior District Manager
Blake Small, WM District Manager
Jodi Reynolds, WM Environmental Protection Manager