



August 30, 2012

Mr. Mike Sigman
L&W Environmental, LLC
Pulaski County Recycling and Disposal Facility
9611 Ironton Road
Little Rock, AR 72206

AFIN: 60-04211

NPDES Permit No.: ARR000462

Dear Mr. Sigman:

On August 24, 2012, Dennis Benson, Inspector, ADEQ Water Division and I performed a reconnaissance level industrial stormwater investigation of the waste treatment facility at the request of Lori Burke, Inspector, ADEQ Solid Waste Division. The inspection was conducted in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The following violations were revealed at the time of inspection:

- 1) The following violations of Part 6.17 of Permit No. ARR000000 and of the Arkansas Water and Air Pollution Control Act [(A.C.A. §8-4-217(a)(2))] which prohibits the placing of waste where it is likely to cause pollution were observed:
 - a. Evidence of water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which flows into a stormwater pond was observed. This is a non-stormwater discharge; specifically, a process water/leachate and is therefore prohibited to be discharged into Waters of the State.
 - b. Construction and demolition material (wood materials) was floating within a stormwater pond.
 - c. Evidence of a hydrocarbon spills in the fuel storage area were observed.
 - d. Leachate from wood materials (railroad ties) was observed upslope of the western perimeter of a stormwater pond. Neither a leachate collection system nor Best Management Practices (BMP's) were being utilized at the time of inspection which would properly dispose of and prevent the flow of leachate from these materials into the stormwater pond.
- 2) Water is being extracted from a stormwater pond and utilized in material processing equipment. Please submit a full description of your process in detail (including day to day operation) regarding this activity to the Water Division Inspection Branch of this Department. This response must include a description of any and all discharges associated with this activity.

Mr. Mike Sigman
L&W Environmental, LLC
Page 2

- 3) Construction and demolition materials including lumber and processed wood materials are being placed within and along the western perimeter of a stormwater pond. Please submit a full description of your process in detail (including day to day operation) regarding this activity to the Water Division Inspection Branch of this Department.

Additionally, evidence of leachate discharge from a shingles pile and into a drainage course which ultimately flows into a stormwater pond was observed. This is in violation of the Arkansas Water and Air Pollution Control Act [(A.C.A. §8-4-217(a)(2))] which prohibits the placing of waste where it is likely to cause pollution. The facility has entered into a Consent Administrative Order (CAO) with the ADEQ Solid Waste Division. To facilitate the ADEQ Water Division's tracking of your progress in this matter, please submit a final report to ADEQ Water Inspection Branch no later than November 15, 2012. If you are required to submit a report to the ADEQ Solid Waste Division on the removal of the shingles, then a copy of that report submitted to the ADEQ Water Division will satisfy that reporting requirement.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by **September 13, 2012**. If I can be of any assistance, please contact me 501-682-0658 or parkerr@adeq.state.ar.us.

Sincerely,



Risa Parker
District 9 Field Inspector
Water Division

Cc: Lori Burke, Inspector, ADEQ Solid Waste Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 N 2 5 3 A R R 0 0 0 4 6 2		1 2 0 8 2 3 17	18 R	19 S 20 2	
Remarks					
A F I N 6 0 - 4 2 1 1					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N 72 N	73 74 75	80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)

L & W Environmental, LLC
9611 Ironton Road
Little Rock, AR 72206

Entry Time/Date

2:00 pm on 8/23/12

Permit Effective Date

3/30/2009

Exit Time/Date

3:00 pm on 8/23/12

Permit Expiration Date

6/30/2014

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ken Vadnais and John Varnadore; L & W Environmental, LLC; 501-888-1544

Other Facility Data

Mike Sigman
L & W Environmental, LLC
9611 Ironton Road
Little Rock, AR 72206

Contacted

Yes ☒ No ☐

PDS #067524

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	U	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
U	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See NPDES Report Page 4 for a summary of findings/comments.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Risa Parker	ADEQ/Water Division/501-682-0658/501-682-0880	August 29, 2012
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

NPDES Compliance Inspection Report
Further Explanation

- 1) The following violations of Part 6.17 of Permit No. ARR0000000 and of the Arkansas Water and Air Pollution Control Act [(A.C.A. § 8-4-217(a)(2))] which prohibits the placing of waste where it is likely to cause pollution were observed:
 - a. Evidence of water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which flows into a stormwater pond was observed. This is a non-stormwater discharge; specifically, a process water/leachate and is therefore prohibited to be discharged into Waters of the State.
 - b. Construction and demolition material (wood materials) was floating within a stormwater pond.
 - c. Evidence of a hydrocarbon spills in the fuel storage area were observed.
 - d. Leachate from wood materials (railroad ties) was observed upslope of the western perimeter of a stormwater pond. Neither a leachate collection system nor Best Management Practices (BMP's) were being utilized at the time of inspection which would properly dispose of and prevent the flow of leachate from these materials into the stormwater pond.
- 2) Water is being extracted from a stormwater pond and utilized in material processing equipment. Please submit a full description of your process in detail (including day to day operation) regarding this activity to the Water Division Inspection Branch of this Department. This response must include a description of any and all discharges associated with this activity.
- 3) Construction and demolition materials including lumber and processed wood materials are being placed within and along the western perimeter of a stormwater pond. Please submit a full description of your process in detail (including day to day operation) regarding this activity to the Water Division Inspection Branch of this Department.

Additionally, evidence of leachate discharge from a shingles pile and into a drainage course which ultimately flows into a stormwater pond was observed. This is in violation of the Arkansas Water and Air Pollution Control Act [(A.C.A. § 8-4-217(a)(2))] which prohibits the placing of waste where it is likely to cause pollution. The facility has entered into a Consent Administrative Order (CAO) with the ADEQ Solid Waste Division. To facilitate the ADEQ Water Division's tracking of your progress in this matter, please submit a final report to ADEQ Water Inspection Branch no later than November 15, 2012. If you are required to submit a report to the ADEQ Solid Waste Division on the removal of the shingles, then a copy of that report submitted to the ADEQ Water Division will satisfy that reporting requirement.

Water Division NPDES Photographic Evidence Sheet							
Location:	L & W Environmental, LLC (Pulaski County Recycling & Disposal)						
Photographer:	Risa Parker, ADEQ Water Division			Witness:	Dennis Benson, ADEQ Water Division		
Photo #	1	Of	16	Date:	8/23/12	Time:	2:40 pm
Description:	Water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which discharges into a stormwater pond.						
							
Photo #	2	Of	16	Date:	8/23/12	Time:	2:40 pm
Description:	Water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which discharges into a stormwater pond.						
							

Water Division NPDES Photographic Evidence Sheet									
Location:		L & W Environmental, LLC (Pulaski County Recycling & Disposal)							
Photographer:		Risa Parker, ADEQ Water Division				Witness:		Dennis Benson, ADEQ Water Division	
Photo #	3	Of	16		Date:	8/23/12	Time:	2:38 pm	
Description:		Water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which discharges into a stormwater pond.							
									
Photo #	4	Of	16		Date:	8/23/12	Time:	2:39 pm	
Description:		Water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which discharges into a stormwater pond. On-site personnel opened the drain to the collection system during the ADEQ inspection.							
									

Water Division NPDES Photographic Evidence Sheet									
Location:		L & W Environmental, LLC (Pulaski County Recycling & Disposal)							
Photographer:		Risa Parker, ADEQ Water Division				Witness:		Dennis Benson, ADEQ Water Division	
Photo #	5	Of	16		Date:	8/23/12	Time:	2:39 pm	
Description:		Receiving ditch for water being utilized to facilitate the processing of materials being handled at the recycling facility; this ditch conveys flow into a stormwater pond.							
									
Photo #	6	Of	16		Date:	8/23/12	Time:	2:42 pm	
Description:		Evidence of a hydrocarbon spill.							
									

Water Division NPDES Photographic Evidence Sheet									
Location:		L & W Environmental, LLC (Pulaski County Recycling & Disposal)							
Photographer:		Risa Parker, ADEQ Water Division				Witness:		Dennis Benson, ADEQ Water Division	
Photo #	7	Of	16		Date:	8/23/12	Time:	2:43 pm	
Description:		Evidence of a hydrocarbon spill.							
									
Photo #	8	Of	16		Date:	8/23/12	Time:	2:15 pm	
Description:		Construction and demolition material including ground wood material and processed wood material being utilized for fill along and within the western perimeter of a stormwater pond. Material observed floating in the stormwater pond.							
									

Water Division NPDES Photographic Evidence Sheet

Location:	L & W Environmental, LLC (Pulaski County Recycling & Disposal)						
Photographer:	Risa Parker, ADEQ Water Division			Witness:	Dennis Benson, ADEQ Water Division		
Photo #	9	Of	16	Date:	8/23/12	Time:	2:15 pm

Description:

Construction and demolition material including ground wood material and processed wood material being utilized for fill along and within the western perimeter of a stormwater pond. Material observed floating in the stormwater pond.



Photo #	10	Of	16	Date:	8/23/12	Time:	2:13 pm
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Description:

Construction and demolition material including ground wood material and processed wood material being utilized for fill along and within the western perimeter of a stormwater pond. Material observed floating in the stormwater pond.



Water Division NPDES Photographic Evidence Sheet								
Location:	L & W Environmental, LLC (Pulaski County Recycling & Disposal)							
Photographer:	Risa Parker, ADEQ Water Division				Witness:	Dennis Benson, ADEQ Water Division		
Photo #	11	Of	16		Date:	8/23/12	Time:	2:16 pm
Description:	Construction and demolition material including ground wood material and processed wood material being utilized for fill along and within the western perimeter of a stormwater pond.							
								
Photo #	12	Of	16		Date:	8/23/12	Time:	2:20 pm
Description:	Construction and demolition material including ground wood material and processed wood material being utilized for fill along and within the western perimeter of a stormwater pond.							
								

Water Division NPDES Photographic Evidence Sheet									
Location:		L & W Environmental, LLC (Pulaski County Recycling & Disposal)							
Photographer:		Risa Parker, ADEQ Water Division				Witness:		Dennis Benson, ADEQ Water Division	
Photo #	13	Of	16		Date:	8/23/12	Time:	2:20 pm	
Description:		Leachate from shingles pile located in a ditch which ultimately conveys flow to a stormwater pond.							
									
Photo #	14	Of	16		Date:	8/23/12	Time:	2:36 pm	
Description:		Leachate from shingles pile located in a ditch which ultimately conveys flow to a stormwater pond.							
									

Water Division NPDES Photographic Evidence Sheet

Location:	L & W Environmental, LLC (Pulaski County Recycling & Disposal)						
Photographer:	Risa Parker, ADEQ Water Division			Witness:	Dennis Benson, ADEQ Water Division		
Photo #	15	Of	16		Date:	8/23/12	Time: 2:18 pm
Description:	Leachate generated from railroad tie pile; located upslope of a stormwater pond. Neither a leachate collection system nor Best Management Practices (BMP's) were being utilized at the time of inspection which would properly dispose of and prevent the flow of leachate from these materials into the stormwater pond.						



Photo #	16	Of	16		Date:	8/23/12	Time: 2:05 pm
Description:	Hoses utilized to extract water from a stormwater pond and discharge into material processing machinery.						



From: [Benson, Dennis](#)
To: [Parker, Risa](#)
Cc: [Miller, Dennise](#)
Subject: FW: Water Inspection Response
Date: Tuesday, September 18, 2012 4:18:58 PM
Attachments: [Water Response.pdf](#)

Water id 9898

Dennis Benson

District 9 Inspector

Water Division

From: Kenneth Vadnais [mailto:kenvlwenviro@att.net]

Sent: Tuesday, September 18, 2012 1:39 PM

To: Benson, Dennis

Subject: Water Inspection Response

Here is our response to the Water Inspection. Thanks

Ken Vadnais

Sales/Marketing Mgr.

L&W Environmental

KenVlwenviro@att.net

Cell- 501-850-6685

Fax- 501-888-2220



**CONSTRUCTION AND DEMOLITION
RECYCLING AND DISPOSAL**
L&W ENVIRONMENTAL, LLC

ADEQ Water Division
Attn: Ms. Risa Parker
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: L&W Material Recovery Facility AFIN: 60-04211 NPDES Permit No.: ARR000462

Dear Ms. Parker:

L&W is providing the following response to the inspection conducted at the L&W Material Recovery Facility by the ADEQ Water Division on August 24, 2012.

a. Evidence of water being utilized to facilitate the processing of materials being handled at the recycling facility; contacting the materials; bypassing the on-site collection system, and subsequently flowing into a drainage course which flows into a stormwater pond was observed. This is a non-stormwater discharge; specifically, a process water/leachate and is therefore prohibited to be discharged into Waters of the State.

Response: The practice has been modified to prevent flow of the process water back to the stormwater pond. A temporary sump has been excavated and the water is collected and treated properly. It should be noted that L&W is in the process of redesigning the process area for the wood. This will involve moving the grinder further north away from the pond. This should mitigate or lessen the issues of wood ejected from the grinder entering the pond.

b. Construction and demolition material (wood materials) was floating within a stormwater pond.

Response: As stated in the above response L&W is in the process of redesigning the wood process area. However there is always some wood that is ejected from the grinder into the pond. The position of the grinder cannot be changed due to safety issues. L&W will use a boat to remove as much of this material as possible from the pond.

c. Evidence of a hydrocarbon spills in the fuel storage area were observed.

Response: This area has been cleaned and the hydrocarbon contaminated material removed and dispose of properly.

d. Leachate from wood materials (railroad ties) was observed upslope of the western perimeter of a stormwater pond. Neither a leachate collection system nor Best Management Practices (BMP's) were being utilized at the time of inspection which would properly dispose of and prevent the flow of leachate from these materials into the stormwater pond.



**CONSTRUCTION AND DEMOLITION
RECYCLING AND DISPOSAL**
L&W ENVIRONMENTAL, LLC

Response: Since the time of the inspection L&W has put full effort in removing all wood and waste from this area. As stated above L&W is in the process of redesigning the wood processing area. Upon final removal of the wood from the present soil will be placed to provide proper drainage and preventing any ponding. This should be completed no later than September 30, 2012

2) Water is being extracted from a stormwater pond and utilized in material processing equipment. Please submit a full description of your process in detail (including day to day operation) regarding this activity to the Water Division Inspection Branch of this Department. This response must include a description of any and all discharges associated with this activity.

Response: Process water is used in the grinding process as a means of dust suppression and fire control. The majority of the water is soaked into or combines with the material. Previously, any remaining flow was allowed to reenter the stormwater pond. This practice has ceased and a temporary collection sump has been constructed to collect this water. Upon collection is properly treated and disposed.

3) Construction and demolition materials including lumber and processed wood materials are being placed within and along the western perimeter of a stormwater pond. Please submit a full description of your process in detail (including day to day operation) regarding this activity to the Water Division Inspection Branch of this Department.

Response: The placement of any wood along or in the pond has immediately ceased. This was the result of placing unclean fill be used in a low lying area adjacent to the pond. The placement of concrete along the perimeter of the pond is continuing. The concrete provides a direct benefit to L&W. The majority of the site includes a mine pit that is currently full of water. The north and west perimeters of the mine pit are shallow. By filling in these areas L&W can increase the area of land available for daily operation. In addition, the placement of concrete in typically low pH water provides additional buffering and improvement in the water quality. L&W inspects and screens each load to minimize detrimental materials. Additional screening is performed after placement. Any material that is not inert is removed.

As requested in the Inspection Letter, a report will be submitted upon completion of the removal of shingle from the Class 4 area. If you have any questions or concerns please contact me at (501) 276-5625.

Mike Sigman



ARKANSAS
Department of Environmental Quality

September 24, 2012

Mr. Mike Sigman
L&W Environmental, LLC
Pulaski County Recycling and Disposal Facility
9611 Ironton Road
Little Rock, AR 72206

AFIN: 60-04211; NPDES Permit No.: ARR000462

Dear Mr. Sigman:

I have reviewed your response pertaining to my August 23, 2012 inspection of your facility. However, additional information is required to sufficiently address the violations delineated in my inspection report.

- 1) Facility Response: "Process water is used in the grinding process as a means of dust suppression and fire control. The majority of the water is soaked into or combines with the material. Previously, any remaining flow was allowed to reenter the stormwater pond. This practice has ceased and a temporary collection sump has been constructed to collect this water. Upon collection is properly treated and disposed.
 - ADEQ Response: Please specify the methods used for treatment and disposal of the process water referenced in the facility response. Additionally, it is noted in the response that a 'temporary collection sump' has been constructed. Please identify the permanent method which will be utilized to address the collection, treatment, and disposal of process water utilized in the machinery at the facility.
- 2) Facility Response: "The practice has been modified to prevent flow of the process water back to the stormwater pond. A temporary sump has been excavated and the water is collected and treated properly. It should be noted that L&W is in the process of redesigning the process area for the wood. This will involve moving the grinder further north away from the pond. This should mitigate or lessen the issues of wood ejected from the grinder entering the pond."
 - ADEQ Response: Please specify the methods used for collection (i.e. location of the sump in relation to the on-site collection system identified in Photo 4 of 16, NPDES Report Page 6, Water Division inspection report dated August 30, 2012); and the methods used for treatment and disposal of the process water utilized to facilitate the processing of materials at the site. Additionally, it is noted in the response that a 'temporary collection sump' has been excavated. Please identify the permanent method which

will be utilized to address the collection, treatment, and disposal of process water/leachate from the processing of materials being handled at the recycling facility.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by October 8, 2012. If I can be of any assistance, please contact me 501-682-0658 or parkerr@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Risa Parker", written in a cursive style.

Risa Parker
District 9 Inspector
Water Division

From: [Benson, Dennis](#)
To: [Parker, Risa](#)
Cc: [Miller, Dennise](#)
Subject: FW: Water inspection response
Date: Monday, October 15, 2012 4:27:55 PM
Attachments: [ADEQ LW Response 10.08.12.docx](#)

Dennis Benson

District 9 Inspector

Water Division

From: Kenneth Vadnais [mailto:kenvlwenviro@att.net]

Sent: Monday, October 15, 2012 4:23 PM

To: Benson, Dennis

Subject: Water inspection response

Dennis, here is our response to the follow-up of the water inspection. Thanks

Ken Vadnais

Sales/Marketing Mgr.

L&W Environmental

KenVlwenviro@att.net

Cell- 501-850-6685

Fax- 501-888-2220

Dear Ms. Parker:

L&W Environmental is providing the following responses to the ADEQ Water Division Letter dated September 24, 2012. ADEQ in this letter identified two items that required additional information. Follows is L&W responses.

ADEQ Response 1- L&W has currently shut down the shingle operation and is in the process of designing and implementing a permanent solution to the management of any process water. Because of the minimal process water generation, L&W is considering using the on-site collection system tank to collect the process water. The contents of the tank are currently being transported to a POTW. L&W may also consider a dedicated tank to collect process water from the shingle operation. L&W will provide the ADEQ documentation on the final design.

ADEQ response 2- After further review and discussions with Material Recovery Personnel, L&W will not use any process water in the grinding of the wood waste. L&W will however maintain a water source for fire suppressions near the grinding operation. It should be noted that L&W has completely remove the remaining wood waste that was located on the southern end of the grinding area. L&W will complete the redesign of the area by the end of October. Pictures are attached for your review.

Please let us know if you need additional information or documentation.

Sincerely



ARKANSAS
Department of Environmental Quality

October 24, 2012

Mr. Mike Sigman
L&W Environmental, LLC
Pulaski County Recycling and Disposal Facility
9611 Ironton Road
Little Rock, AR 72206

AFIN: 60-04211; NPDES Permit No.: ARR000462

Dear Mr. Sigman:

I have reviewed an inspection report response submitted via e-mail by Ken Vadnais, L&W Environmental on October 15, 2012. However, additional information is required to sufficiently address the violations delineated in my inspection report.

- 1) The response letter was unsigned. Mike Sigman is listed as the Cognizant Official in our records. Please submit a signed letter.
- 2) Also, the response letter references that pictures are attached; however no photos were received with the attachment. Please resend them.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by November 7, 2012. If I can be of any assistance, please contact me 501-682-0658 or parkerr@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Risa Parker".

Risa Parker
District 9 Inspector
Water Division

ADEQ

ARKANSAS
Department of Environmental Quality

October 24, 2012

Mr. Mike Sigman
L&W Environmental, LLC
Pulaski County Recycling and Disposal Facility
9611 Ironton Road
Little Rock, AR 72206

AFIN: 60-04211; NPDES Permit No.: ARR000462

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Sincerely,



Risa Parker
District 9 Inspector
Water Division

Risa, Sorry for
the Confusion!



**CONSTRUCTION AND DEMOLITION
RECYCLING AND DISPOSAL**
L&W ENVIRONMENTAL, LLC

Dear Ms. Parker:

L&W Environmental is providing the following responses to the ADEQ Water Division Letter dated September 24, 2012. ADEQ in this letter identified two items that required additional information. Follows is L&W responses.

ADEQ Response 1- L&W has currently shut down the shingle operation and is in the process of designing and implementing a permanent solution to the management of any process water. Because of the minimal process water generation, L&W is considering using the on-site collection system tank to collect the process water. The contents of the tank are currently being transported to a POTW. L&W may also consider a dedicated tank to collect process water from the shingle operation. L&W will provide the ADEQ documentation on the final design.

ADEQ response 2- After further review and discussions with Material Recovery Personnel, L&W will not use any process water in the grinding of the wood waste. L&W will however maintain a water source for fire suppressions near the grinding operation. It should be noted that L&W has completely remove the remaining wood waste that was located on the southern end of the grinding area. L&W will complete the redesign of the area by the end of October. Pictures are attached for your review.

Please let us know if you need additional information or documentation.

Mile Seguin
Sincerely







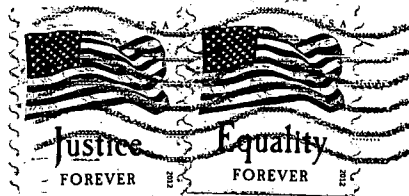




2+1 Environmental
9611 Montan Rd
Little Rock, Ar, 72209

LITTLE ROCK AR 722

26 OCT 2012 PM 3 L



ADEQ
5301 Northshore Drive
North Little Rock, AR, 72118-5317
Attn: Risa Parker
Water Division

72118531799





November 1, 2012

Mr. Mike Sigman
L&W Environmental, LLC
Pulaski County Recycling and Disposal Facility
9611 Ironton Road
Little Rock, AR 72206

RE: Inspection Response
AFIN: 60-04211; NPDES Permit No.: ARR000462

Dear Mr. Sigman:

I have reviewed the response received October 29, 2012 regarding the August 23, 2012 inspection of your facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0658 or you may e-mail me at parkerr@adeq.state.ar.us.

Sincerely,

Risa Parker
District 9 Field Inspector
Water Division