Albert H. Miller, P.E. (1932-2001)

Miller-Newell Engineers, Inc.

510 THIRD STREET - POST OFFICE BOX 705
NEWPORT, ARKANSAS 72112
TELEPHONE (870)-523-6531 - FAX (870)-523-6533
email: milnewengr@aol.com

AFIN: 73-00029
Pmt #: 0018SWTP
REC'D
SCAN ☒ OCT 19 2011
Doc ID#: 61053
To: BLZ file

SWMD

September 26, 2011

Mr. Bryan Leamons
Solid Waste Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Response to Notice of Deficiency for White River Recycling & Reclamation
Waste Tire Processing Permit Application
Permit No.: 0018-SWTP AFIN: 73-00029
Document Number: 60462
M-N #11-003

Dear Bryan:

Thank you for your response to our waste tire permit application and notice of deficiencies. The following response is submitted:

1. Application Box 1; Response: "Tire Derived Fuel User" was check and W.R.R.R. does not use the fuel but rather shreds the tire for tire derived duel use. The box has been revised to reflect this change.

2. Application Box 2 - Name of Property Owner; Response: The correct owner and operator information has been provided (revised) on Form TP-4. Strickland L.L.C. is the owner of the property (heirs of Robert Strickland). WRRSWMD desires to be the permit holder for the tire processing facility who leases the property from Strickland L.L.C. The WRRSWMD has direct and financial interest and obligation to the facility. Recently the District purchased a second shredder and conveyor system for $239,744.00 for use at the facility, and also owns the operating equipment consisting of two (2) dump trucks, a backhoe, several tire hauling and storage trailers and a fire pumper truck.

3. Application Box 2 - Type of Owner; Response: The correct owner and operation information has been provided (revised) on Form TP-4. The WRRSWMD administers the regional waste tire program for ten counties in North Center Arkansas District. The permit holder will be WRRSWMD. The District contracts with the White River Management Corporation, which is a separate entity created by WRRSWMD to operate (only) the fire facility. WRRSWMD is the management for the facility.

4. Application Box 5, Facility Design, Item 1; Response: Please find attached an Area Site Topography Map/Land Use Map (Sheet 2a or 2) depicting the missing items named, equipment process flow diagram, and storm water calculations.

5. Application Box 5, Facility Design, Item 3; Response: Please find attached an updated Area Topography Plan (Sheet 2a or 2) showing site topography for the tire processing center complete with identified contours to demonstrate more clearly the storm water control.

6. Application Box 5, Facility Design, Item 3; Response: The updated Area Topography Plan and Site Plan (Sheet 2a or 2) has been updated to show the legal boundaries of the leased land being utilized for both a tire processing center and Class 3T landfill. An onsite land survey has been completed along with the setting of legal boundary property corners.

7. Application Box 5, Facility Design, Item 3; Response: The Plot Plan (Sheet 1) has now been revised to show and demonstrate reference to Regulation 14.1402(A), "A waste tire site shall not be constructed, maintained or operated in or within two hundred (200) feet of any wetland, transitional wetland or isolated wetland." As shown on the updated plot plan, no wetland is on the property nor is any wetland within 200 feet of any of the tire processing center outer boundary (dashed and dotted line). The 200 feet border does cross the very northwest corner of the quarry detention basin which is the main storm water pond which receives flow from the preliminary detention pond. Storm water ponds used in conjunction with a tire processing center and/or landfill are not considered wetlands. Wetlands by definition are those defined by 40 CFR 232.2(r) according to Regulation 22. Generally, this definition are those areas inundated by water at a frequency and duration sufficient to support a prevalence of vegetation adapted to saturated soil conditions which include swamps, marshes, bogs or similar areas. The pond lacks this vegetation and is a void created when the site was a rock quarry and has since filled with water.

8. Operation Plan and Narrative; Response: A separate Closure Plan for the Tire Processing Center has been included herewith along with a Closure Cost Estimate.

9. Emergency Preparedness Plan - Who will actually manage the waste tire processing center; Response: WRRMC is the operation entity and WRRMC will be responsible for the onsite operation and management of the facility.

10. Emergency Preparedness Plan; Response: The Emergency Preparedness Plan has been revised to be specific to the tire processing center and contained certain details of extinguisher locations, etc. and is provided herein.

Thank you for your consideration.

Sincerely yours,

Keith Page

Keith Page
Project Manager

KP/km
Attachments

cc: Jan Smith, WRPDD, Batesville, AR
Van Thomas, WRPDD, Batesville, AR

ADEQ

ARKANSAS
Department of Environmental Quality

REVISED 09/15/2011

WASTE TIRE PROCESSING FACILITY PERMIT APPLICATION

(TP-4)



Pursuant to Section 14, (Waste Tire Processing Facility Requirements), of Regulation 14, Waste Tire Program, to obtain a permit for the operation of a waste tire processing facility, a processor shall submit the following information to the Department:

1. Application Information

Type of Facility: Check One	☐ Waste Tire Processing Facility ☒ Waste Tire Processing Facility Permitted with On-Site Disposal ☐ Permitted Solid Waste Management Facility modified with On-Site Processing			
Type of Application: Check One	☐ Proposed New Facility ☐ Existing Unpermitted Facility	☒ Other:		
	☐ Renewal of Permitted Facility ☒ Modification of Permitted Facility	Permit Nbr.:	018-SWTP	
		AFIN:	73-00029	
Type of Processor: Check as many as apply	☒ Shredder	☐ Cutter	☐ Tire Derived Fuel User	
	☒ Baler	☐ Chopper	☐ Other:	

2. Owner and Operator Information

Name of Property Owner:	**Strickland Brothers, L.L.C.**	Telephone Nbr.:	**870-251-2967**
		Fax Nbr.:	**N/A**
Mailing Address:	**1203 North Main Court**	Manager and/or Owner Name:	**Rob Strickland**
City/State/Zip:	**Beebe, AR 72012**	E-Mail:	**N/A**
Type Of Owner:	☒ Individual ☐ Partnership ☐ Corporation ☐ Government ☒ Other		
Company Name of Site Operator:	**White River Regional Solid Waste Management District (WRRSWMD)**	Operator Name:	**Van C. Thomas**
Operator Address:	**P.O. Box 2396**	Operator Telephone Nbr.:	**870-793-5233**
City/State/Zip:	**Batesville, AR 72503**	E-Mail:	**jsmith@wrpdd.org**
Type Of Operator:	☐ Individual ☐ Partnership ☐ Corporation ☒ Government ☐ Other		

3. Site Information

Site Name:	**White River Recycling & Reclamation**	County:	**White**
Site Address:	**220 Conway Road**	Site Telephone Nbr.:	**870-612-4367**
City/State/Zip:	**Bald Knob, AR 72101**	LAT/LONG:	**35.3052/91.6058**
Section, Township and Range:	**Section 24, Township 8 North, Range 6 West**		
Site Directions from Major intersection:	**The facility is located off of State Hwy. 367 at Bald Knob. Turn left (north) on Conway Road, go approximately one (1) mile, facility is located on the right (east) through the entrance gate.**		

Return Completed Form and Attachment(s) to:
ADEQ SWMD – Waste Tire Program
5301 Northshore Drive – North Little Rock, AR 72118
Phone: (501) 682-0592 or (501) 682-0583
Fax (501) 682-0611 www@adeq.state.ar.us

4. Quantities of Waste Tires/Processed Tires Stored at Site and/or Disposed

Note: Processed tires must be expressed in tons, assuming 100 passenger or 20 truck tires per ton.

	Current Storage (Tons)	Storage Area (Square Ft.)	Maximum Storage (Tons)
Waste Tires:	**10 (Processing Area)**	**43,560 (Processing Area)**	**20 (Processing Area)**
Processed Tires:	**9371 (2010)**	**217,800 (5 acres)**	**124,478**
Totals:	**9381**	**261,360 (6 acres)**	**124,498**

If not to be disposing of processed tires or processing residual on the facility site, indicate the permitted solid waste management facility where processed tires or residuals will be disposed:

Facility Name:	White River Recycling & Reclamation	Site Telephone Nbr.:	870-612-4367
Street Address:	220 Conway Road	County:	White
City/State/Zip:	Bald Knob, AR 72010		

If to be delivering processed tires to a recycling facility, describe the existing or proposed markets for processed tires: Shredded/processed tires are trucked to Armorel, AR at Nucor-Yamato Steel for fuel source.

5. Required Attachments

(Include the following items in the application or give an explanation, if they are not applicable.)

NOTE: All maps, plan sheets, drawings, isometrics, cross sections, or aerial photographs shall be legible; be signed and sealed by a registered professional engineer responsible for their preparation; be of appropriate scale to show clearly all required details; be numbered, referenced to narrative, titled, have a legend of symbols used, contain horizontal and vertical scales, (where applicable), and specify drafting or origination dates; and use uniform scales as much as possible, contain a north arrow, and use National Geodetic Vertical Datum (NGVD) for all elevations.

Facility Design

1. A typographic or section map of the facility, including the surrounding area for one mile, no more than one year old, showing land use and zoning within one mile of the facility
2. Evidence that the facility is in conformance with local zoning
3. A plot plan of the facility on a scale of not less than one inch equals 200 feet. At a minimum, the plot plan shall include:
   a) The facility design, including the location and size of all storage and processing areas for waste tires, processed tires, and residuals from processing;
   b) All wetlands and water bodies;
   c) Storm water control measures, including ditches, dikes and other structures;
   d) Legal boundaries, easements and right of ways;
   e) Location of all wells, operating and abandoned
   f) All structures and buildings that are or will be constructed at the facility; include those used in storage and processing operations;
   g) All areas used for loading and unloading;
   h) All access roads and internal roads, including fire lanes;
   i) Location of all fences, gates, and other access control measures; and
   j) Location of all processed tire or residual disposal areas.

Facility Operation

1. Description of the facility's operation, including how waste tires and processed tires will be collected, stored and processed
2. Description of how each of the storage requirements in Regulation 14, Waste Tire Program, will be met
3. Copy of the emergency preparedness manual for the facility
4. Copy of the fire safety survey
5. Description of how 75% of the annual accumulation of waste tires and processed tires will be processed and removed for disposal or recycling
6. Completed **closure plan** for the facility as required by Regulation 14, Waste Tire Program
7. **Proof of financial responsibility** as required by Regulation 14, Waste Tire Program
8. **Permit fee** required by Regulation 14, Waste Tire Program

Return Completed Form and Attachment(s) to:
ADEQ SWMD – Waste Tire Program
5301 Northshore Drive – North Little Rock, AR 72118
Phone: (501) 682-0592 or (501) 682-0583
Fax (501) 682-0611 www@adeq.state.ar.us

6. Certification

The undersigned applicant or authorized representative of White River Regional Solid Waste Mgt. District is aware that statements made in this form and attached information are an application for a waste tire processing facility permit from the Arkansas Department of Environmental Quality and certifies that the information in this application is true, correct, and complete to the best of his/her knowledge and belief. Further, the undersigned agrees to comply with the provisions of Act 749, Regulation 14, Arkansas statutes, and all rules and regulations of the Department. It is understood that the permit is not transferable, and the Department will be notified prior to the sale or legal transfer of the facility.

Signature of Authorized Agent	Van C. Thomas, Executive Director Print Authorized Agent Name and Title	9-15-2011 Date

White River Regional Solid Waste Management District

Note: Attach letter of authorization if agent is not a governmental official, owner or corporate officer.

7. Professional Engineer Registered in Arkansas

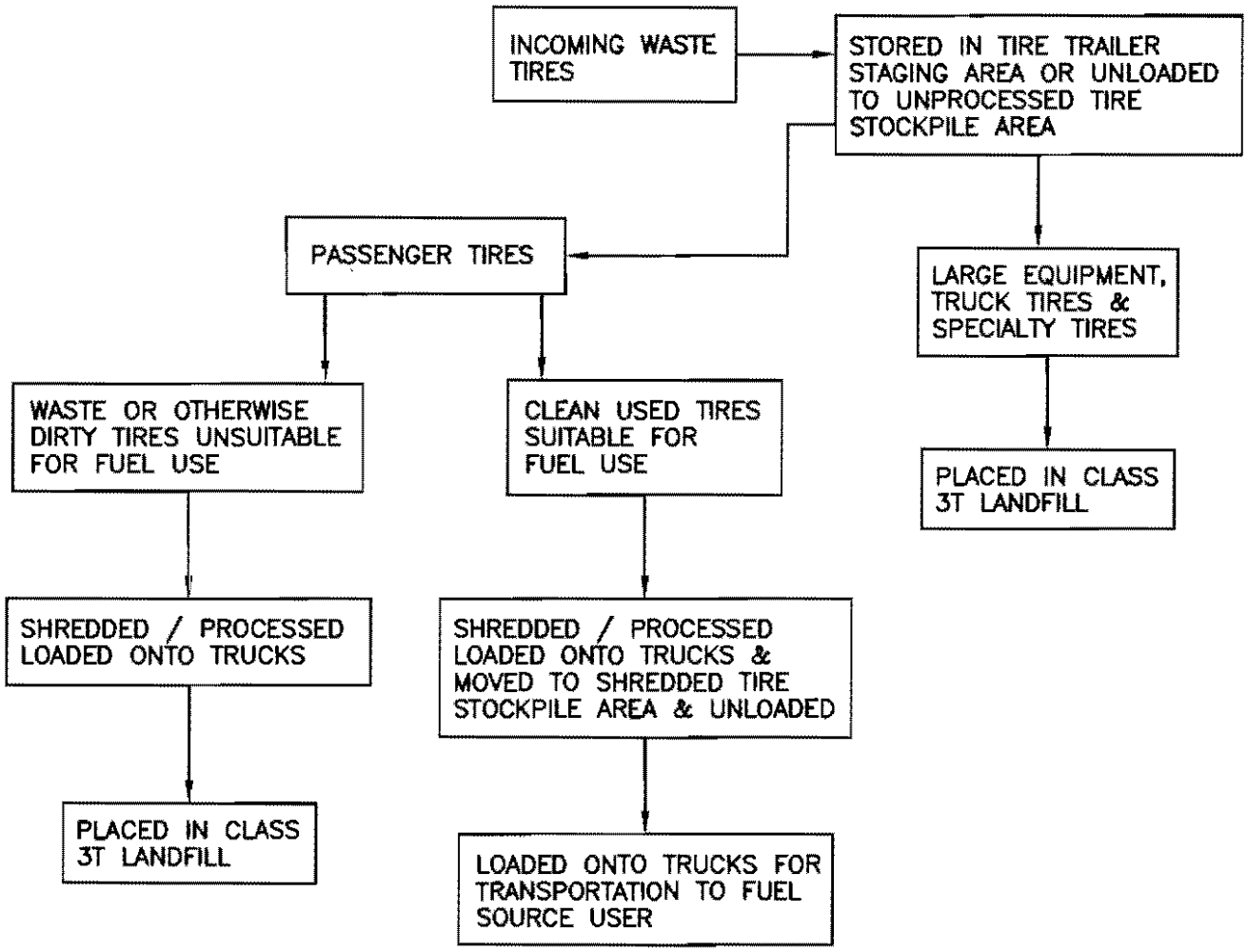
This is to certify that the engineering features of this waste tire processing facility have been designed and/or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly maintained and operated will comply with all applicable statutes of the State of Arkansas and rules of the Department. It is agreed that the undersigned will provide the applicant with a set of instructions for proper maintenance and operation of the facility.

Signature:	
Printed Name and Title	Wayne Menley, P.E.
Mailing Address:	P.O. Box 705
City/State/Zip:	Newport, AR 72112
Telephone Nbr.:	(870) 523-6531
Arkansas Registration Nbr.:	9689

STATE OF ARKANSAS
REGISTERED PROFESSIONAL ENGINEER
No. 9689
WAYNE MENLEY

Return Completed Form and Attachment(s) to:
ADEQ SWMD – Waste Tire Program
5301 Northshore Drive – North Little Rock, AR 72118
Phone: (501) 682-0592 or (501) 682-0583
Fax (501) 682-0611 www@adeq.state.ar.us

WHITE RIVER RECYCLING & RECLAMATION
TIRE PROCESSING CENTER
EQUIPMENT PROCESS FLOW DIAGRAM



WHITE RIVER RECYCLING & RECLAMATION
WASTE TIRE PROCESSING PERMIT #0018-SWTP
STORM WATER VOLUME CALCULATIONS

Storm Water Pond Area = 180,856 ft^2 = 4.15 acres

Water Level = 209'

Top of Levee = 215.5'

Provide 2' Freeboard = 215.5' - 2 = 213.5'

Storage Depth = 213.5 - 209' = 4.5'

Storage Volume = 4.5'(180,856 ft^2) = 813,852 ft^3

Tire Monofill Area = 581,681 ft^2 = 13.35 acres
Tire Processing Area = 737,145 ft^2 = 16.9 acres

Design Stormwater for 10 year 24 hour event = 5.86" = 0.48833 ft.

Tire Monofill Stormwater Volume = 581,681 ft^2(0.48833) = 284,054 ft^3
Tire Processing Stormwater Volume = 737,144.65 ft^2(0.48833) = 359,970 ft^3

Total Storm Water Volume = 644,024 ft^3

Total Storage Volume = 813,852 ft^3

Stormwater pond has adequate volume to store a 10 year 24 hour event.

WHITE RIVER RECYCLING & RECLAMATION
TIRE PROCESSING CENTER
BALD KNOB, ARKANSAS

Permit Number: 0018-SWTP
AFIN: 73-00029

CLOSURE PLAN

AND

CLOSURE COST ESTIMATE

August 2011

Prepared by:

MILLER-NEWELL ENGINEERS, INC.
P.O. Box 705
510 Third Street
Newport, AR 72112

WHITE RIVER RECYCLING & RECLAMATION
TIRE PROCESSING CENTER

I. CLOSURE PLAN PROCEDURE

Upon planned closure of the White River Recycling & Reclamation Tire Processing Center, the owner shall:

(1) Cease public access to the site.

(2) Post a notice indicating the site is closed and where the nearest open site is located where tires can be accepted.

(3) Notify ADEQ and local government of the of planned closure.

(4) All on site tires must be property processed and placed in the adjacent Class 3T landfill. If placement of the on site tires in not available, then the onsite tires must be removed along with all residuals to a permitted solid waste management facility where such is acceptable.

(5) The entire waste tire processing area(s) must be graded to promote storm water flow. All areas with depressions must be filled. All runoff from the site must be sloped to drain to the existing storm water ditches.

(6) Notify ADEQ when closure is complete.

The owner shall begin closure activities no later than thirty (30) days after the date of the final receipt of waste. If the landfill unit has remaining capacity after the planned date of closure, then the facility shall begin closure activities no longer than one (1) year after the most recent receipt of waste tires. Closure activities shall be completed within one hundred eighty (180) days from the beginning of closure activities. The owner shall notify ADEQ should the need for any completion extensions exist, such as those caused by weather limitations.

The entire surface of the proposed closed area shall be graded to promote adequate drainage prior to any final cover placement. The grading shall be contoured to eliminate any depressions. After grading of the site the final cover layer consisting of a minimum of 18" of clay soils with maximum hydraulic conductivity of 1.0×10^{-5} cm/sec compacted to 95% of standard proctor, followed by 6" of topsoil, shall be constructed over the landfill site. After completed, the entire closed area shall be surveyed on at least a 50' grid to document the final cover surface.

Upon completion of the closed unit, the owner must record a deed notation that identifies the past use of the facility. Future land uses shall not disturb the integrity of the closed landfill and residential use of the property is prohibited. When completed, the deed notation must be presented to ADEQ and it must be placed in the operating record.

A certification of the closure plan must be completed by a registered professional engineer. The certification must include verification of soil tests of the final cover (clay layer) minimum properties and design thickness.

ADEQ shall be notified upon the completion of closure and shall determine if the closure is approved.

II. CLOSURE PLAN

The owner shall begin closure activities no later than thirty (30) days after the last receipt of waste tires, including notification to ADEQ of planned closure of the waste tire processing center. Closure activities shall be completed within one hundred eighty (180) days from the beginning of closure activities. The owner shall notify ADEQ should the need to extend the period beyond 180 days, such as weather limitations, be necessary and may only be extended with ADEQ approval.

The tire processing facility has existing a gated entranceway along with adjacent fencing and ditches which control access to the site. Upon closure this gate should be chained and locked, preventing any public access to the site. A sign shall be posted at the entrance indicating the site is in closure activity and the sign shall also indicate where the nearest tire processing center is that is available for disposition of waste tires.

Upon closure all existing onsite waste shall be properly processed into the adjacent Class 3T landfill or if not available at the time of closure, then all onsite tires and all residuals must be transported to a permitted facility by the owner. All processing equipment must be removed from the site. Upon completion of this clean up work, the entire tire processing area shall be graded to promote drainage to the storm water drainage and eliminate all depressions and ponding of water. When completed with this closure, ADEQ shall be notified for approval.

III. CLOSURE COST ESTIMATE

The following items have been estimated for a processing site closure. The largest area most costly for third party closure has been considered.

Area = Approximately 600' x 1000' = 600,000 sf ÷ 43,560 sf/acre = 13.77 or 14 acres

1. Cost to process existing stockpiled tires or load and transport tires and residuals to a permitted facility: Lump sum - $10,000.00

2. Cost to remove all equipment from the site: Lump sum - $8,000.00

3. Cost to re-grade the site to promote drainage: 14 acres @$500/acre = $7,000.00

4. Cost to seed, mulch and fertilize the site to establish vegetation and control surface erosion: 14 acres @$500/acre = $7,000.00

5. Cost to obtain a professional engineer to review documents and provide certified closure: Lump sum = $1,500.00

Total estimated cost of closure of the tire processing center = $33,500.00

Upon approval of this closure cost estimate, it shall be updated annually to reflect any inflationary changes.

WHITE RIVER RECYCLING & RECLAMATION

TIRE PROCESSING CENTER

EMERGENCY PREPAREDNESS PLAN

The White River Regional Solid Waste Management District manages the Class 3T tire monofill, tire processing center and waste tire collection center located at 220 Conway Road, Bald Knob, Arkansas.

Nolan Quinn is the facility operator. His cell phone number is 870-612-4367. Mr. Quinn is employed by the White River Regional Management Corporation, P.O. Box 2396, Batesville, Arkansas 72503; telephone number 870-793-5233. The White River Regional Management corporation is the entity of the facility which is managed by White River Regional Solid Waste Management District and both are government agencies.

Permits currently for the facility are:

Waste Tire Processing	0018-SWTP (Pending)
Waste Tire Collection Center	0142-SG-WTX
Class 3T Tire Monofill	0289-S3T-R2

FIRE PROTECTION SERVICES

Fire protection for the Tire Processing Center is available nearby from the Bald Knob Fire Department (see City Inspector's report by Fire Chief attached). The fire chief inspects the site periodically and finds the site satisfactory for fire protection. The site is kept free of weeds, grasses, underbrush and other potentially flammable vegetation. An adequate water source is located onsite at the Quarry Detention Pond and has a significant storage of water which can be readily available to pull water from in the event of fire for use by the onsite pumper truck, owned and maintained by the facility, or by the local fire authority.

As required by Regulation, the facility operator of the site shall immediately notify the White River Regional Solid Waste Management District and ADEQ in the event of a fire or other emergency if that emergency has potential off site effects. Within two (2) calendar weeks of any emergency involving potential of off site impact, the operator of the site shall submit to ADEQ a written report on the emergency. The report shall describe the origins of the emergency, the actions that were taken to mitigate the emergency, the results of the actions taken, an analysis of the success (or failure) of the actions, and the steps that were taken to avoid future similar incidents.

Phone communication equipment is located and maintained at the tire processing center to assure immediate action can be authorized to the local fire protection services

and an other emergency authorities that may be required. The site phone number is 870-612-4367.

As stated earlier, the tire processing center owns and maintains a pumper fire truck onsite. The pumper truck is always filled and operational for immediate use to control any fire hazard. Also, two (2) fire extinguishers are located on the property, one in the office building and one attached to the framework of the facility processing metal building for immediate use by the personnel to control a fire before it has spread. If the fire extinguishers are not effective in controlling the fire, then the pumper can be utilized to extinguish any fire and immediately the local fire authority shall be contacted for further control and backup as required. All workers onsite are trained to know how to use the fire fighting equipment and where it is located. WRRSWMD contracts with a company who routinely checks and maintains the fire extinguishers to be in working order.

All minimum separation distances between exposed buildings and tire stockpiles are maintained in accordance with the National Fire Protection Association Standards. The size of the stockpiles shall have no greater width than fifty (50) feet, no greater length that one-hundred (100) feet, and no greater height than fifteen (15) feet. A fifty (50) foot wide fire land shall be kept around the perimeter of the stockpile and must be accessible to emergency equipment at all times.

Persons to be contacted in the event of a fire, flood or other emergency, include:

Van C. Thomas	870-793-5233 870-612-0464 (cell)
Jan Smith	870-793-5233 870-454-4791 (cell)
Bill Estes	870-307-3637

EMERGENCY EVENT

Temporary cover shall be used to mitigate fire hazards or assist in fire suppression in the event of an emergency situation. Soil used a fire control cover is hauled periodically, stockpiled onsite by the Crenshaw Brothers, readily available and can be placed by on site equipment (front end loader and dozer).

The owner or operator shall properly remove, process, or otherwise dispose of the subject soil material used to control a fire within sixty (60) days of such emergency event and notify ADEQ of the event.

STORM WATER CONTROL

The tire processing center site has been graded and ditched to divert storm water or flood waters around and away from the storage piles.

BALD KNOB FIRE DEPARTMENT

2402 Highway 367 North
P.O. Box 156
Bald Knob, Arkansas 72010

Danny Holobaugh
Chief

Telephone: 501-724-3000
Email: bkfire@centurytel.net

8/31/2010

Fire inspection at the White River Management at 220 Conway road the waste tire facility is very well maintained and is not a fire threat the tires are separated very good and fire extinguisher in place.

Fire Chief
Danny Holobaugh

MAP(S)/PLAN(S) SCANNED IN SEPARATE FILE