



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
DIVISION OF SOLID WASTE MANAGEMENT
1625 Hollywood Drive
JACKSON, TENNESSEE 38305-4316
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283

July 24, 2015

CERTIFIED MAIL

7013 0600 0000 6167 9341

Mr. Chris White, President
Environmental Waste Solutions, LLC
4521 Trousdale Drive
Nashville, Tennessee 37204

Re: Phase Development/Waste Management Plan Submitted 4-15-15
EWS Camden Class II Landfill (IDL 03-0212)
Benton County

Dear Mr. White:

In a letter dated October 27, 2014, the Division of Solid Waste Management (DSWM) requested a revised Phase Development/Waste Management Plan for the EWS Camden Class II Landfill (EWS). On April 15, 2015, EWS submitted a revised Operations Manual in its entirety, a revised closure/post-closure plan with associated financial cost allocations and the revised phase development plan.

The Division hereby notifies you of the review results in accordance with Rule 0400-11-.01-.02(6)(b)2(ii). This correspondence does not constitute a complete assessment of the Operations Manual. EWS must comply with the Operations Manual under the current permit and previously approved minor modifications.

Updates to administrative information including the facility name and contact information is duly noted as are the minor modifications approved to date. However, please note some references within the Operations Manual are inconsistent with the named detail. For example, the reference to Table 7 on page nine for alternate liner system components is identified as a seed guideline table on page 24. Please review to ensure consistent references are given within the Operations Manual.

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Pertinent revised portions of the Operations Manual were reviewed based on the specific information requested and are approved as noted below.

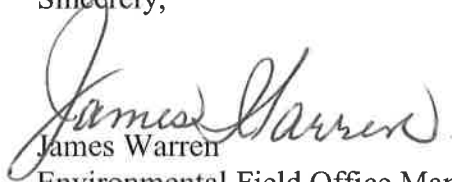
- The amended closure plan and financial assurance was approved June 18, 2015.
- The alternate GCL proposed for Phase 4 was approved October 16, 2014.

The proposed use of foundry sand described on pages 16-18 of the Operations Manual does not agree with the existing daily cover permit condition. Also regarded as a solid waste, introduction of foundry sand contradicts the secondary aluminum smelter waste mono-fill provision. Hence, the use of foundry sand as a protective base and cover for the DuraSkrum must not be utilized and should be omitted from the Operations Manual.

Lastly, a response to the phase development plan as relates to current Phase 4 construction and the relocation of waste will be provided in separate correspondence.

If you have any questions concerning this letter, please call me at (731) 512-1337 or Pete Kelly of my staff at (731) 512-1341.

Sincerely,



James Warren
Environmental Field Office Manager
Division of Solid Waste Management

Cc: DSWM NCO & JEFO File
Patrick Flood, P.E. & Environmental Program Administrator, DSWM
Lisa Hughey, Deputy Director Central Office, DSWM
Ashley Holt, Deputy Director of Field Offices, DSWM
Glen Pugh, Environmental Manager, DSWM
Nick Lytle, Environmental Manager, DSWM
Abe Almassi, P.E. & Environmental Consultant, DSWM
Bassam Faleh, Environmental Protection Specialist, DSWM
Jo House P.E., P.G. – House Engineering LLC