# Waste Permit Applications/Introduction: Ben Reynolds, P.E., SCS Engineers - Arkansas Environmental Federation Land Seminar Presentation

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Ben Reynolds, undertook a presentation on April 16th at the Arkansas Environmental Federation Land Seminar titled:

*Introduction: Waste Permit Applications*

*You have trash. What are you doing with it?*

("Presentation")

Mr. Reynolds is a Professional Engineer with the Little Rock Office of SCS Engineers.

The Presentation addressed the activities associated with a proper disposition of unwanted materials noting:

- Characterization needed
- Solid Waste
- Liquid Waste or sludge
- Hazardous waste
- Characterization Methods
- Analytical Data
- Manufacturer Documentation / Safety Data Sheets (SDS)
- Knowledge of Process

Ben focused on permitting the treatment, storage, and disposal of waste.

Disposal options for liquids and sludges are noted to include:

- Land Application
- OWQ permit needed, so tomorrow
- Injection Wells
- OWQ permit needed, so tomorrow
- Solidification
- OLR permit needed if hazardous waste
- Incineration

- OLR permit needed if hazardous waste
- OAQ permit needed always

Disposal options for solid waste (non-hazardous):

- OLR Permit needed under APC&EC Rule 22
- Composting
- Recovering recyclable materials
- Collect & Transfer to an existing landfill
- Landfill
- For who?
- What stuff?
- Bulky & inert (non-putrescent)
- Industrial wastes
- Tires
- General Household

Disposal options (hazardous waste):

- ADEQ Office of Land Resources Permit needed under Arkansas Pollution Control & Ecology Commission Rule 23 (i.e., Resource Conservation and Recovery Act permits)
- Treatment
- Storage
- Disposal
- Landfill
- Incineration
- Other treatment

Ben then addressed pre-permit requirements for solid and hazardous waste, listing the categories of site selection/separation distances, notifications, and recommending starting a conversation with ADEQ Office of Land Resources "early".

The solid waste application process for both APC&EC Rule 22 and Rule 23 were examined in detail (including both pre-application and application). The requirement for public notice and permit and permit issuance for the solid waste application process was reviewed.

Ben also addressed the hazardous waste application process which included:

- Application – Part A
- Application – Part B (denominated "everything else")

A particular examination was undertaken of the hazardous waste application process which included the following components:

- Administrative Review
- Respond to Administrative Notice Of Deficiencies (NODs), if any
- Receive Administrative Complete notification
- Technical Review
- Respond to Technical NODs
- Expect 1 or 2 rounds of these
- Receive Technically Complete notice & upcoming public notice notification

Further, as with solid waste, the public notice and permit issuance was discussed.

A copy of the Presentation's slides can be downloaded here.