ADEQ
ARKANSAS
Department of Environmental Quality

June 30, 2014

The Honorable Larry Bryant
Forrest City Mayor
P.O. Box 1074
Forrest City, AR 72335

RE: Quarterly Inspection; AFIN 62-00070; Permit Number 0051-SCYW-MC.

Dear Mr. Bryant,

On June 27, 2014, I conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Regulation 22, and the above-referenced permit. A copy of the inspection report is enclosed for your records.

Please refer to the attached inspection report to note the specific allegations. A written response for the noted allegations, describing the corrective action taken or to be taken, must be submitted to my attention at the address listed below within thirty (30) days from the date hereof. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected and/or persistent may warrant formal enforcement action.

If I can be of any further assistance, feel free to contact me at (870) 935-7221.

Sincerely,

Tobin Baker

Tobin Baker, ADEQ Inspector
Solid Waste Management Division

Attachment

Arkansas Department of Environmental Quality
Solid Waste Management Division
Compost Inspection

Site Name	Forrest City Compost	**County**	St. Francis	**AFIN**	62-00070
Facility Address	Hwy 334 East	**Phone number**	870-261-1418	**Permit number**	0051-SCYW-MC
Permittee Address	P.O. Box 1074 Forrest City, AR 72335	**E-Mail Address**		**PDS #**	078618
Date	6-27-2014	**Entry time**	12:30	**Exit time**	13:00

Classification Type	X	**Y – Yard Waste**		**O – Source Separated Organic Waste**		**S – Mixed Solid Waste**

Regulation 22 – Operational Standards

Category 1

X Depicts Violation
R Repeat Violation

	Regulation	Item Description	Comments
	806(a)(4);(b)(9)	Site access, all-weather roads, signage	
X	808(a)(b)(c)	Record keeping and Reporting	See Comments Page
	805(b)(1);805(c)(5)	Operating records retained	
	808(a)(4);(b)(2)	Type and source of incoming waste; monitoring quantity	
	805(b)(2);(c)(6)	Conform to operations narrative/plan	
	804	Adequate plans for monitoring, sampling, testing & contingency	
R	805(b)(1);(c)(5)	Facility has operating plan	See Comments Page

Category 2

X Depicts Violation
R Repeat Violation

	Regulation	Item Description	Comments
	805	Operations in accordance with permit documents	
	805(c)(3) *Type O&S*	Processing of incoming waste within 3 days	
	806(a)(5);(b)(10)	Adequate methods to manage odors	
	806(a)(5);(b)(10)	Adequate controls to manage vectors, dust, and litter	
	805(a)(2)	Operations follow acceptable methods	
	807(a)(b)(c);808(b)(9) *Type O&S*	Testing of run-off and compost	
	805(c)(2) *Type O&S*	Daily temperature readings recorded	
	805(c)(4) *Type O&S*	Finished compost not sold within 6 months	
	806(a)(6);(b)(11)	Methods to handle and remove unacceptable waste	
	806(a)(2);806(b)(3)	Adequate composting area surface, slope and drainage	
	805(a)(3)	Operations performed by licensed operator	
	808(a)(4);(b)(2)	Monitoring types of wastes received	

X R	Depicts Violation (Repeat Violation)	Category 3	
	Regulation	**Item Description**	**Comments**
	809(a)(b)(c)	Compost Utilization	
	805(c)(1) *Type O&S*	Compost process meets PFRP	
	805(a)(1)	Operations preclude pollution	
R	806(a)(3);(b)(7)	Adequate controls for stormwater, runoff, and NPDES	See Comments Page
	805(c)(3) *Type O&S*	Adequate leachate and NPDES control measures	
	806(b)(8) *Type O&S*	Leachate collection and removal system	

Regulation 22 - Records

804(b)(8)(i)(C)(D)	Date of last random inspection for unauthorized hazardous waste	Every load	Total number for month	
808(b)(11)	Date of last quarterly/semi-annual/annual report	6/20/2013		
808(a)(4)(b)(2)	Last months reported waste received	20 Ton-Leaves	62 Ton-Chips	

Operator Name & Number	**Floyd Patton 001948**	**Signature of Inspector**	John Baker

Exit Interview Conducted with	**Mose Metcalf**	**Method**	**On-site**	**Date**	**6-27-2014**	**Time**	**12:55**

For ADEQ Use Only

Arkansas Department of Environmental Quality
Solid Waste Management Division
Comments Page

Site Name	Forrest City Compost	AFIN	62-00070	Permit Number	0051-SCYW-MC

Category 1 Comments

Reg.22.808- Recordkeeping And Reporting (Record keeping and reporting)
(c) Annual Reports – All composting facilities shall submit an annual report to the Department covering a reporting period from January through December, and shall be submitted to the Department by March 31 of each year covering the previous reporting period.

Comment: No annual report was submitted to the department for the 2013 calendar year by March 31st of 2014.

Reg. 22.805 Operational Requirements (Facility has operating plan)
(b)Type Y Operating Requirements:
(1)A written operating record shall be maintained in accordance with Reg.22.808(a).

Comment: The Facility operating plan has not been approved by the Solid Waste Management Division. The Operating Plan and Narrative was submitted as part of the NOI (Document # 63922) submitted to the Department on 2/13/2013. On 11/19/2013, a Notice of Deficiency (Document # 65234) was issued regarding the NOI, requesting additional information regarding the Operating Plan and Narrative. On 3/11/2014, a Notice of Deficiency (Document # 65644) was issued again requesting additional information regarding the Operating Plan and Narrative. On 4/15/2014, Document #65835 was submitted to the Department but has not been approved by the Department as the facility operating plan.

Category 3 Comments

Reg. 22.806 Design Requirements (Adequate controls for stormwater, runoff, and NPDES)
(a)Class Y facility design must include the following:
(3)Stormwater management controls to meet State and Federal regulations and to prevent stormwater run-on from entering receiving, processing, curing, or storage areas.

Comment: Still noted this inspection; The storm water ditch flow was impeded due to improper placement of yard waste. These materials were dumped in the storm water ditches and on the road. See photos 1-3.

Date	6/27/2014	Signature of Inspector	Tobin Baker	Page	3

0051-SCYW-MC Photos 1 & 2





0051-SCYW-MC Photos 3

