ADEQ
ARKANSAS
Department of Environmental Quality

December 22, 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.

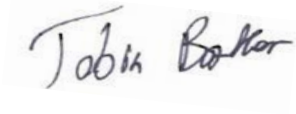
Dear Mr. Bryant:

On December 19, 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 or bakert@adeq.state.ar.us.

Sincerely,



Tobin Baker
ADEQ Inspector
Solid Waste Management Division

Attachment
Cc: Scott McWilliams; Enforcement Coordinator

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 870-317-6525	**Permit number**	0051-SCYW-MC
Permittee Address	P.O. Box 1074 Forrest City, AR 72335	**E-Mail Address**		**PDS #**	081593
Date	12/19/2014	**Entry time**	**12:20 PM**	**Exit time**	**12:45 PM**

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

Regulation 22 – Operational Standards

Category 1

	Regulation	Item Description	Comments
	806(a)(4);(b)(9)	**Site access, all-weather roads, signage**	
	808(a)(b)(c)	**Record keeping and Reporting**	
	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**	
X	**805(b)(1);(c)(5)**	**Facility has operating plan**	See Comments Page

Category 2

	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**	
X	**806(a)(2);806(b)(3)**	**Adequate composting area surface, slope and drainage**	See Comments Page
	805(a)(3)	**Operations performed by licensed operator**	
	808(a)(4);(b)(2)	**Monitoring types of wastes received**	

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	
	806(a)(3);(b)(7)	Adequate controls for stormwater, runoff, and NPDES	
	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	7/1/2014	Site Conditions	Wet	
808(a)(4)(b)(2)	Last months reported waste received	Not available at time of inspection.	Weather Conditions	Cloudy	

Operator Name & Number	Floyd Patton 001948	Signature of Inspector	Tobin Baker

Exit Interview Conducted with	Larry Bryant	Method	Mayor's Office	Date	12/19/2014	Time	12:50 PM

For ADEQ Use Only

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Comments Page

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

Category 1 Comments

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: Still noted this inspection, the f acility 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:
(2)The composting area shall have a surface that can withstand heavy equipment loads, and shall be sloped to prevent ponding.

Comment: Storm water was ponding in the middle of the composting floor which was not adequately sloped to prevent ponding of storm water. See photos 1-2.

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

Additional Comments

On 12/19/2014, I spoke with Forrest City Mayor Larry Bryant to discuss the Forrest City compost facility. I informed the Mr. Bryant that the facility does not have a current permit. According to Document #63239, to continue coverage under the Type Y composting general permit you are now required to complete the new Notice of Intent (NOI), submittal of a completed NOI was required by November 30, 2012. On 2/11/2013 the NOI (Document #63922) was submitted to the department however, the NOI did not meet all the requirements of the NOI. On 11/26/2013, a Notice of Deficiency (NOD) was issued for the NOI since it did not fulfill the requirements of the NOI. On 12/3/2013, Public works Director Mose Metcalf submitted an operating plan (Document #65291) which still did not meet the requirements of the NOI. On 3/11/2014, another NOD was issued (Doucment #65644) because the NOI requirements still had not been met. On 4/15/2014, Interim Director Mose Metcalf submitted an operating plan which still did not meet all requirements of the NOI. On 10/16/2014, a NOD #3 was issued since the requirements of the NOI still had not been met. I also informed Mayor Bryant that a licensed professional engineer should submit the information addressed in the NOD to meet the requirements of the NOI.

Reg.22.301- General Provisions

(i) *Professional Services Required - The services of a professional engineer registered in the State of Arkansas, and for Class 1, Class 3 and Class 4 landfills a professional geologist registered in the State of Arkansas, shall be retained by all applicants for disposal and processing permits; for the development of geotechnical and hydrogeologic studies, permit plans and specifications; and the preparation of an operating plan and narrative as described herein.*

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0051-SCYW-MC Photos 1 & 2



