ADEQ
ARKANSAS
Department of Environmental Quality

April 11, 2016

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 April 7, 2016, 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
Office of Land Resources Division

Attachment
Cc: Scott McWilliams; Enforcement Coordinator

Arkansas Department of Environmental Quality
Office of Land Resources 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 #**	090170
Date	4/7/2016	**Entry time**	**2:05 PM**	**Exit time**	**2:50 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**	
	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**	

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	1/4/2016		Site Conditions	Dry
808(a)(4)(b)(2)	Last months reported waste received	69.16 Tons of Chips 76.44 Tons of Leaves		Weather Conditions	Sunny

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

Exit Interview Conducted with	Floyd Patton	Method	On-site	Date	4/7/2016	Time	2:45 PM

For ADEQ Use Only

0051-SCYW-MC Photo 1



Arkansas Department of Environmental Quality
Office of Land Resources Division
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 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. On 10/16/2014, another Notice of Deficiency (Document # 66634) was issued regarding the NOI, requesting additional information regarding the Operating Plan and Narrative. The requested information has not yet been submitted to the Department.

Category 2 Comments

AFIN: 62-00070
PMT#: 0051-SCYW REC'D SCAN

APR 26 2016

DOC ID#: 69470
TO: TB file SWMD

Date	4/7/2016	Signature of Inspector	Tobin Baker	Page	1

For ADEQ Use Only

Arkansas Department of Environmental Quality
Office of Land Resources 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 #**	090170
Date	4/7/2016		**Entry time**	2:05 PM	**Exit time**	2:50 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	
	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	

1.) Restrictions and siting requirements of Regulation 22.803:

a.) The Type-Y facility does not lie within a Wetlands area.

b.) The facility lies within St. Francis County, Arkansas. The County does not have a county-wide land use plan. The facility is located on property owned by the City of Forrest City and within the former landfill site which has been closed.

c.) The facility is located more than 50 feet from any property line, more than 100 feet from any naturally occurring surface water body, stream or streamed, and more than 200 feet from any residence business or drinking water supply.

2.). Regulations 22.806(a)

a.) General Schematic:

City picks up leaves, grass clippings & tree limits only, which are run through a chipper, no other materials are picked up.

▼

Products are taken to compost storage area and placed on site.

▼

Material is turned and windrowed periodically to aerate and prevent water ponding. No additives are added. Decomposition is by natural process only.

b.) The compost area is sloped to allow for drainage. A bulldozer and a back-hoe is utilized to move the material around to prevent ponding.

c.) Drainage ditches and other preventive measures are utilized to comply with the SWPPP which was submitted in June, 2009.

d.) The compost site is located on property owned by the City of Forrest City. Access to the site is limited to City personal and access gates are kept locked.

e.) The compost site is located more than a quarter of a mile away from the main access and Arkansas Highway 334. The decomposition of the yard waste is natural without any additives. The process does not produce on odor. The site is so far away from residences, the noise from the City equipment is negligible, and any dust from the City vehicles arriving and leaving the site is minimal.

f.) About two-thirds (2/3) of the site is actually used to store the material since it was opened. The City allows the public to come to the site, under their supervision, once a month to get the material for their use, free of charge. The City is the only entity that picks up and brings the material to the site, so anything other than yard waste is not picked up, or brought to the site.

Closure Plan – Regulation 22.804 (b)(9)

If and when the City of Forrest City decides to close the compost facility the following steps shall be taken.

1.) The City will notify the Public and ADEQ when the site will be closed.
2.) The Public shall be given ample time and opportunity to get all compost material before the closing.
3.) The City will meet with a third party for updated costs and time required to accomplish removal and disposal of remaining compost material.
4.) The City shall provide periodic updates to the closure plan to ADEQ as per their request.
5.) The City shall notify ADEQ in writing 60 days prior to the proposed termination date of the facility.
6.) Within 10 days of ceasing operations, all residuals, waste, etc. shall be removed from the site and disposed. The City will then arrange for a final cleaning of any containers, equipment, machines, etc.
7.) After all material has been removed, the area shall be landscaped for proper drainage and seeded with grass to stabilize and prevent erosion.

Third Party Cost Estimate
For the Closure Activities

Triple G Excavating Inc.

576 Hwy 261 South
Palestine, AR 72372
(870) 581-2227 Office
(870) 581-2226 Fax

Estimate

Number: 0541

Date: March 10, 2016

Bill To:

F.C Landfill
c/o Paul Gunn

Ship To:

Job Number or Project Name	Tax ID #	Contractors License #
	62-1680088	0131030516

Date	Description	Quantity	Price	Amount
	Remove & Dispose of woodchip piles (4 acres)			75,250.00
	Seeding (4 acres)			2,000.00
	Straw Blowing (4 acres)			6,000.00
			Total	$83,250.00