ADEQ
ARKANSAS
Department of Environmental Quality

August 15, 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 August 11, 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 Solid Waste Inspector
Office of Land Resources

Attachment

Cc: Tammie Hynum, Acting Sr. Operations Manager, Office of Land Resources

Arkansas Department of Environmental Quality
Office of Land Resources -Solid Waste Management
Compost Inspection

Site Name	Forrest City Compost	**County**	St. Francis	**AFIN**	62-00070
Facility Address	3300 Hwy 334 East Forrest City, AR 72335	**Phone number**	870-261-1418 870-317-6525	**Permit number**	0051-SCYW
Permittee Address	P.O. Box 1074 Forrest City, AR 72335	**E-Mail Address**		**PDS #**	092286
Date	8/11/2016	**Entry time**	**12:45 PM**	**Exit time**	**1:18 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

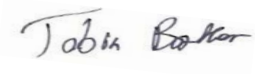
	Regulation	Item Description	Comments
X	**805**	**Operations in accordance with permit documents**	See Comments Page
	805(c)(3) ***Type O&S***	**Processing of incoming waste within 3 days**	
	806(a)(5);(b)(10)	**Adequate methods to manage odors**	
	806(a)(5);(b)(10)	**Adequate controls to manage vectors, 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	76.44 Tons of Chips 76.44 Tons of Leaves		Weather Conditions	Sunny

Operator Name & Number	Floyd Patton 001948		Signature of Inspector				
Exit Interview Conducted with	George Rooks	Method	On-site	Date	8/11/2016	Time	1:10 PM

For ADEQ Use Only

Arkansas Department of Environmental Quality
Office of Land Resources -Solid Waste Management
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

Reg. 22.805 Operational Requirements (Operations in accordance with permit documents)
(b)Type Y Operating Requirements:
(1)A written operating record shall be maintained in accordance with Reg.22.808(a).
(2)The operation shall conform to an approved written operating narrative that includes or addresses the requirements of this Chapter.

Comment: The facility is currently operating without a valid permit. According to Document# 63239, to continue coverage under the Type Y composting general permit the facility was required to submit a completed Notice of Intent (NOI) by November 30, 2012. However, the facility still has not submitted all the required information to obtain the permit. Therefore, the most recent Notice of Deficiency (Document #66634) was issued for the NOI.

Date	8/11/2016	Signature of Inspector	Tobi Baker	Page	1

0051-SCYW Photo 1

