ADEQ
ARKANSAS
Department of Environmental Quality

June 28, 2018

Mayor Frank Hash
City of El Dorado
P. O. Box 2170
El Dorado, AR 71730-2170

RE: Quarterly Inspection conducted on June 21, 2018
AFIN 70-00119
Permit Number 0005-SCYW

Dear Mayor Hash:

The Arkansas Department of Environmental Quality Office of Land Resources (ADEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq*.), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. The inspection identified conditions at your facility which the ADEQ alleges constitute violations of APC&EC Regulation No. 22. A copy of the inspection report is attached.

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 within thirty (30) calendar days from the date of this letter to the attention of Gerry Eddy. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected or persistent may warrant formal enforcement action.

If I can be of any further assistance, please do not hesitate to contact me at (501) 837-6916 or eddy@adeq.state.ar.us.

Sincerely,

Gerry Eddy
Solid Waste Inspector
Office of Land Resources

Attachment

cc: Charles M. Johnson, Senior Manager, Regulated Waste Operations, Office of Land Resources

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Arkansas Department of Environmental Quality
Solid Waste Management Division
Compost Inspection

Site Name	City of El Dorado Yard Waste Composting	**County**	Union	**AFIN**	70-00119
Facility Address	764 Industrial Park Road	**Phone number**	870-881-4185	**Permit number**	0005-SCYW
Permittee Address	204 North West Ave. ElDorado, AR 71730	**E-Mail Address**		**PDS #**	103497
Date	**6/21/2018**	**Entry time**	**1030**	**Exit time**	**1050**

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**	
X	**808(a)(b)(c)**	**Record keeping and Reporting**	Facility has not submitted 2017 Annual Report. Report was due 3/31/2017.
	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**	
	805(b)(1);(c)(5)	**Facility has operating plan**	

Category 2

	Regulation	Item Description	Comments
	805	**Operations in accordance with permit documents**	The facility is currently not composting, only storing yard waste (tree limbs and trunks) for grinding as described in Section 2.0 of the Operating Plan.
	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 storm water, 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	N/A	Total number for month	N/A
808(b)(11)	Date of last quarterly/semi-annual/annual report	6/6/2017	Site Conditions	Dry
808(a)(4)(b)(2)	Last months reported waste received	Not available	Weather Conditions	Clear

Operator Name & Number	Anthony Traylor 003975		Signature of Inspector	Amy Eddy			
Exit Interview Conducted with	Anthony Traylor, Operator	Method	Telephone	Date	6/22/2018	Time	0845

For ADEQ Use Only

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	City of El Dorado Yard Waste Composting			**Permit**	0005-SCYW	**AFIN**	70-00119
Photographer	Gerry Eddy, ADEQ Solid Waste Inspector			**Witness**	N/A		
Photo #	1	**Of**	2	**Date**	6/21/2018	**Time**	1044
Description	View of entrance gate, facing west.						



Location	City of El Dorado Yard Waste Composting			**Permit**	0005-SCYW	**AFIN**	70-00119
Photographer	Gerry Eddy, ADEQ Solid Waste Inspector			**Witness**	N/A		
Photo #	2	**Of**	2	**Date**	6/21/2018	**Time**	1045
Description	Stored yard waste (tree limbs and trunks) to be ground, facing west.						



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A R K A N S A S
Department of Environmental Quality

Regulated Waste Operations Compliance Branch

OFFICE OF LAND RESOURCES

ROUTING SLIP

Date: 6/27/2018

Subj: City of El Dorado Yard Waste Composting – 0005-SCYW Q2 2018 – Inspection Report

From: Gerry Eddy, ADEQ Solid Waste Inspector

Route in turn to:	***Action Needed***	***Date Received***	***Date Reviewed***	***Initials***
Ryan Hayden	■Concurrence ■Review	6/27/18	6/27/18	RH
Chris Krou	■Concurrence ■Review	6/27/18	6/27/18	gc

****Note: Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.***

COMMENTS: