ARKANSAS ENERGY & ENVIRONMENT | ENVIRONMENTAL QUALITY

December 16, 2019

Veronica Creer
City of El Dorado Mayor
P. O. Box 2170
El Dorado, AR 71730-2170

RE: Quarterly Inspection conducted on December 9, 2019
AFIN 70-00119
Permit Number 0005-SCYW

Dear Mayor Creer:

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) 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 DEQ alleges constitutes violations. A copy of the inspection report is attached.

You should immediately initiate actions to correct the alleged violations cited. A written response of the corrective actions taken, or to be taken, must be submitted within thirty (30) calendar days from the date on this letter to the attention of Gerry Eddy. The response may include, but is not limited to, photographs, copies of disposal receipts, records, or analytical results, as applicable. If you have any questions regarding the alleged violations, 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

Enclosure

cc: David Witherow P.E., Senior Manager, Office of Land Resources

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Division 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 #**	110366
Date	**12/9/2019**	**Entry time**	**0955**	**Exit time**	**1025**

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**	Annual report for 2018 had not been submitted to the Department (Report was due March 30, 2019).
	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 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	7/6/2018	Site Conditions	Dry
808(a)(4)(b)(2)	Last months reported waste received	0	Weather Conditions	Cloudy

Operator Name & Number	Anthony Traylor 003975		Signature of Inspector	Amy Eddy			
Exit Interview Conducted with	Anthony Traylor, Operator	Method	On-site	Date	12/9/2019	Time	1020