



October 5, 2017

Mayor Bob McCaslin  
City of Bentonville  
115 West Central  
Bentonville, AR 72712

RE: Quarterly Inspection conducted on September 19, 2017  
AFIN 04-00472  
Permit Number 0297-SC-R1

Dear Mayor McCaslin:

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 Alana Wallace. 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 (479) 424-0333 ext. 206 or [wallace@adeq.state.ar.us](mailto:wallace@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink that reads "Alana Wallace".

Alana Wallace  
Solid Waste Inspector  
Office of Land Resources

Attachment

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



<b>Site Name</b>	Bentonville Compost	<b>County</b>	Benton	<b>AFIN</b>	04-00472
<b>Facility Address</b>	2000 N.W. "A" Street, Bentonville	<b>Phone number</b>	479-271-5954	<b>Permit number</b>	0297-SC-R1
<b>Permittee Address</b>	115 West Central, Bentonville, AR	<b>E-Mail Address</b>		<b>PDS #</b>	099451
<b>Date</b>	9/19/2017	<b>Entry time</b>	1300	<b>Exit time</b>	1335
<b>Classification Type</b>	<input type="checkbox"/> Y – Yard Waste	<input checked="" type="checkbox"/> x	O – Source Separated Organic Waste		<input type="checkbox"/> S – Mixed Solid Waste

### Regulation 22 – Operational Standards

#### Category 1

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
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	
805(b)(1);(c)(5)	Facility has operating plan	

#### Category 2

<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
805	Operations in accordance with permit documents	
805(c)(3) <i>Type O&amp;S</i>	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) <i>Type O&amp;S</i>	Testing of run-off and compost	
805(c)(2) <i>Type O&amp;S</i>	Daily temperature readings recorded	
805(c)(4) <i>Type O&amp;S</i>	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	Depression in concrete pad resulting in ponding water; preventing positive drainage to pond.
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) <i>Type O&amp;S</i>	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) <i>Type O&amp;S</i>	Adequate leachate and NPDES control measures	
806(b)(8) <i>Type O&amp;S</i>	Leachate collection and removal system	

### Regulation 22 - Records

804(b)(8)(i)(C)(D)	Date of last random inspection for unauthorized hazardous waste	9/19/2017	Total number for month	19
808(b)(11)	Date of last quarterly/semi-annual/annual report	5/4/2017	Site Conditions	Dry
808(a)(4)(b)(2)	Last months reported waste received	1665.8 cubic yards	Weather Conditions	Sunny, hot

Operator Name & Number	Joe McMahon - 002145	Signature of Inspector	
Exit Interview Conducted with	Joe McMahon	Method	On-site

Compost Form 8-7-12 (Revised and Implemented 10/21/14)

*For ADEQ Use Only*

**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**

<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace				<b>Witness</b>	None		
<b>Photo #</b>	1	Of	7		<b>Date</b>	9/19/2017	<b>Time</b>	1307
<b>Description</b>	Yard waste.							



<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace				<b>Witness</b>	None		
<b>Photo #</b>	2	Of	7		<b>Date</b>	9/19/2017	<b>Time</b>	1311
<b>Description</b>	Windrows facing east.							



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<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace			<i>AW</i>	<b>Witness</b>	None		
<b>Photo #</b>	3	<b>Of</b>	7		<b>Date</b>	9/19/2017	<b>Time</b>	1313
<b>Description</b>	Ponding water on east side of composting pad.							



<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace			<i>AW</i>	<b>Witness</b>	None		
<b>Photo #</b>	4	<b>Of</b>	7		<b>Date</b>	9/19/2017	<b>Time</b>	1313
<b>Description</b>	Detention pond at east side of composting pad.							



**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**

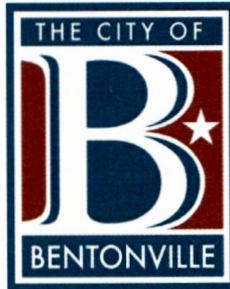
<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace			<i>AW</i>	<b>Witness</b>	None		
<b>Photo #</b>	5	Of	7		<b>Date</b>	9/19/2017	<b>Time</b>	1318
<b>Description</b>		Ponding water at finished compost.						
		 <div style="text-align: center; margin-top: 10px;">09.19.2017 13:18</div>						
<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace			<i>AW</i>	<b>Witness</b>	None		
<b>Photo #</b>	6	Of	7		<b>Date</b>	9/19/2017	<b>Time</b>	1318
<b>Description</b>		Clogged drain at finished compost.						
		 <div style="text-align: center; margin-top: 10px;">09.19.2017 13:18</div>						

**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**

<b>Location</b>	Bentonville Compost				<b>Permit</b>	0297-SC-R1	<b>AFIN</b>	04-00472
<b>Photographer</b>	Alana Wallace				<b>Witness</b>	None		
<b>Photo #</b>	7	<b>Of</b>	7		<b>Date</b>	9/19/2017	<b>Time</b>	1318
<b>Description</b>	Covered finished compost.							



<b>Location</b>					<b>Permit</b>		<b>AFIN</b>	
<b>Photographer</b>					<b>Witness</b>			
<b>Photo #</b>		<b>Of</b>			<b>Date</b>		<b>Time</b>	
<b>Description</b>								



AFIN: 04-00472  
PMT#: 0297-SC-R1

OCT 25 2017

DOC ID#: 72-742  
TO: AWFILE CKMB

Wednesday, October 18, 2017

Arkansas Department of Environmental Quality  
Office of Land Resources  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

ATTN: Alana Wallace, Solid Waste Inspector  
[wallace@adeq.state.ar.us](mailto:wallace@adeq.state.ar.us).

RE: Quarterly Inspection conducted on September 9, 2017  
AFIN 04-00472 Permit Number 0297-SC-R1

Dear Ms. Wallace;

In response to violation 806(a)(2);806(b)(3) issued on 9/9/2017 to the City of Bentonville Compost Facility, regarding a depression in the concrete Windrow Pad issued September 9, 2017.

The city has engaged professional services of the engineering firm Morrison-Shipley, Inc., to sample and prepare a feasibility study report concerning the settling of this structure. The data of core samples obtained are currently under analysis. A consensus for future repair or replacement of the compost pad will follow receipt of this report.

In the interim, all standing water will be manually pumped into the Compost Catch Basin immediately following rain or snow events.

If you have further questions, please contact Chris Earl at [cpearl@bentonvillear.com](mailto:cpearl@bentonvillear.com) or me [nbusen@bentonvillear.com](mailto:nbusen@bentonvillear.com) or 479-271-3161.

Respectfully Submitted,

Nancy Busen, Wastewater Manager  
1901 NE "A" Street  
Bentonville, AR 72712