



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.

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



Arkansas Department of Environmental Quality

Office of Land Resources - Solid Waste Management

Compost Inspection



Site Name	Bentonville Compost	County	Benton	AFIN	04-00472
Facility Address	2000 N.W. "A" Street, Bentonville	Phone number	479-271-5954	Permit number	0297-SC-R1
Permittee Address	115 West Central, Bentonville, AR	E-Mail Address		PDS #	099451
Date	9/19/2017	Entry time	1300	Exit time	1335
Classification Type	<input type="checkbox"/> Y – Yard Waste	<input checked="" type="checkbox"/> O – Source Separated Organic Waste	<input type="checkbox"/> 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	
805(b)(1);(c)(5)	Facility has operating plan	

Category 2

Regulation	Item Description	Comments
805	Operations in accordance with permit documents	
805(c)(3) <i>Type O&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&S</i>	Testing of run-off and compost	
805(c)(2) <i>Type O&S</i>	Daily temperature readings recorded	
805(c)(4) <i>Type O&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&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&S</i>		Adequate leachate and NPDES control measures							
806(b)(8) <i>Type O&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		Date	
						9/19/2017		Time	
								1325	

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location	Bentonville Compost				Permit	0297-SC-R1	AFIN	04-00472
Photographer	Alana Wallace			AW	Witness	None		
Photo #	1	Of	7		Date	9/19/2017	Time	1307
Description	Yard waste.							
								
Location	Bentonville Compost				Permit	0297-SC-R1	AFIN	04-00472
Photographer	Alana Wallace			AW	Witness	None		
Photo #	2	Of	7		Date	9/19/2017	Time	1311
Description	Windrows facing east.							
								

Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

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



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



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


Location	Bentonville Compost			Permit	0297-SC-R1	AFIN	04-00472
Photographer	Alana Wallace		AW	Witness	None		
Photo #	5	Of	7	Date	9/19/2017	Time	1318
Description	Ponding water at finished compost.						



Location	Bentonville Compost			Permit	0297-SC-R1	AFIN	04-00472
Photographer	Alana Wallace		AW	Witness	None		
Photo #	6	Of	7	Date	9/19/2017	Time	1318
Description	Clogged drain at finished compost.						



Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

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



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

OCT 25 2017

DOC ID#: 72-742
TO: AW > FILE < KMB

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.

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 cearl@bentonvillear.com or me nbusen@bentonvillear.com or 479-271-3161.

Respectfully Submitted,

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