



# ARKANSAS

## ENERGY & ENVIRONMENT

October 11, 2022

Mr. Nathan Charles  
10803 Ironton Cutoff  
Little Rock, AR 72206

**RE: General Permit for Construction and Operation of a Yard Waste Compost Facility**  
**Permit Number: 0031-SCYW**  
**Document ID: 82822**

Dear Mr. Nathan Charles:

The Chief Administrator of the Division of Environmental Quality has approved a minor modification, effective October 2, 2022, to the General Permit for Construction and Operation of a Yard Waste Compost Facility pursuant to Ark. Code Ann. § 8-6-207 and Arkansas Pollution Control and Ecology Commission's Rule No. 22.308. This permit modification changes the expiration date for the General Permit without a need for you to submit a Renewal Notice of Intent at this time. Please place the attached cover sheet on your copy of the General Permit.

Please contact Annette Cusher at 501-682-0841 or [Annette.Cusher@adeq.state.ar.us](mailto:Annette.Cusher@adeq.state.ar.us) if there are any questions or if she can be of assistance in any way.

Sincerely,

A handwritten signature in black ink, appearing to read "Jarrod Zweifel".

Jarrod Zweifel, P.G.  
Associate Director  
Division of Environmental Quality  
5301 Northshore Drive, North Little Rock, Arkansas, 72118-5317

cc: Jones, Cusher, Krou, Hayden, McWilliams, Goheen

**GENERAL PERMIT  
FOR CONSTRUCTION AND OPERATION OF  
A YARD WASTE COMPOSTING FACILITY  
(TYPE Y COMPOSTING FACILITY)  
ISSUED BY STATE OF ARKANSAS  
DIVISION OF ENVIRONMENTAL QUALITY**

**PERMIT NUMBER:** 0000-SCYW

**AUTHORITY:** In accordance with the provisions of the Arkansas Solid Waste Management Act (Act 237 of 1971 as amended; Arkansas Code of 1987 Annotated §8-6-201 *et seq.*), and the Arkansas Pollution Control and Ecology Commission (APC&EC) Rule No. 22, the Division has the authority to issue general permits for certain categories of solid waste processing facilities. Pursuant to that authority, the Division has chosen to permit Type Y composting facilities through a general permit program.

**EFFECTIVE DATE:** October 2, 2017

**MODIFICATION DATE:** October 11, 2022 – Effective as of October 2, 2022

**EXPIRATION DATE:** May 31, 2023

**LIMITATIONS:** Owners or operators of Type Y composting facilities within the State of Arkansas who fail to make a written request to the Administrator to be covered by this general permit or those who fail to submit all required documentation are not authorized to operate under the permit.

Signed this 11th day of October, 2022



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Jarrod Zweifel, P.G.  
Associate Director  
Office of Land Resources  
Division of Environmental Quality



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

September 21, 2017

Mr. Warren Atkins  
Solid Waste Service Manager  
City of Little Rock Solid Waste Disposal Facility  
10803 Ironton Cutoff  
Little Rock, AR 72206

**RE: General Permit Coverage – City Little Rock Yard Waste Composting Facility**  
**Permit No. 0031-SCYW                      AFIN: 60-01071**  
**Document ID: 72513                         Reference ID: 72502**

Dear Mr. Atkins:

The Arkansas Department of Environmental Quality Office of Land Resources (ADEQ) Regulated Waste Operations has completed review of the Notice of Intent (NOI) for the City of Little Rock Yard Waste Composting Facility. Based on this information, The City of Little Rock is hereby granted coverage under the General Permit for City of Little Rock Yard Waste Composting Facility located at 10803 Ironton Cutoff, Little Rock Arkansas.

Coverage granted for City of Little Rock Yard Waste Composting Facility is based on the information supplied in the NOI and supporting documents. Operational plans, narratives, and drawings must be followed in order to maintain compliance with the terms of the permit. The facility is required to maintain a minimum of \$174,139.49 in a financial assurance mechanism required by Chapter 14 of Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 22. Please take note of the updated permit tracking number 0031-SCYW. Use this number on all correspondence and reports related to this facility to ensure proper filing of submittals.

If you have any questions or need additional information, please contact Eric Gillette of my staff at (501) 682-0643 or [gillette@adeq.state.ar.us](mailto:gillette@adeq.state.ar.us).

Sincerely,

Kevin White  
Associate Director  
Office of Land Resources

Enclosures: General Permit for Construction and Operation of a Yard Waste Composting Facility.

cc: ADEQ - Johnson, Rich, Cusher, Burke, and Gillette  
FTN - Jason Ghidotti



**GENERAL PERMIT  
FOR CONSTRUCTION AND OPERATION OF  
A YARD WASTE COMPOSTING FACILITY  
(TYPE Y COMPOSTING FACILITY)  
ISSUED BY STATE OF ARKANSAS  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PERMIT NUMBER:** 0000-SCYW

**AUTHORITY:** In accordance with the provisions of the Arkansas Solid Waste Management Act (Act 237 of 1971 as amended; Arkansas Code of 1987 Annotated §8-6-201 *et seq.*), and the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 22, the Department has the authority to issue general permits for certain categories of solid waste processing facilities. Pursuant to that authority, the Department has chosen to permit Type Y composting facilities through a general permit program.

**EFFECTIVE DATE:** October 2, 2017

**EXPIRATION DATE:** October 2, 2022

**LIMITATIONS:** Owners or operators of Type Y composting facilities within the State of Arkansas who fail to make a written request to the Director to be covered by this general permit or those who fail to submit all required documentation are not authorized to operate under the permit.

Signed this 15<sup>th</sup> day of May, 2017

A handwritten signature in blue ink, appearing to read "Tammie J. Hynum", is written over a horizontal line.

Tammie J. Hynum  
Acting Senior Operations Manager  
Office of Land Resources  
Arkansas Department of Environmental Quality

## PERMIT REQUIREMENTS

### I. PERMIT AREA

The area covered by this general permit includes all areas within the State of Arkansas.

### II. ELIGIBILITY AND AUTHORIZATION

- A. Owners or operators of Type Y composting facilities which accept yard waste and other Type Y compost material for composting as described herein and APC&EC Regulation No. 22 may be covered by this general permit.
- B. The Director reserves the right to require at any time that the owner or operator of a Type Y composting facility seek coverage under an individual permit. Notice of the decision to require coverage under an individual permit and the rationale for the decision will be provided to the owner or operator. In considering whether to require individual permitting, the Director may consider:
  - 1. The compliance history of the owners and operators of the facility or compliance history of the site;
  - 2. The size or capacity of the facility;
  - 3. Whether the facility was in existence prior to the effective date of amendments to APC&EC Regulation No. 22 (May 7, 1995);
  - 4. The nature of any incoming solid wastes or materials, the method of processing materials, or the method of storage, handling, or other means of treatment; or
  - 5. Other overriding environmental or public participation issues.
- C. Existing or planned facilities that do not qualify as a Type Y composting facility as described by Section 22.103(c) or 22.802(a)(1) of APC&EC Regulation No. 22 may not be covered by this permit. Facilities which propose to accept wastes other than yard waste or Type Y compost materials as defined by APC&EC Regulation No. 22.102, or other wastes outside the scope of the Type Y (CY) permit category listed in APC&EC Regulation No. 22.103(c) may not be covered by this general permit.
- D. Small capacity compost areas which process less than fifty (50) tons or five hundred (500) cubic yards per year of incoming yard waste, silvacultural activities such as tree prunings and land clearing debris, and agricultural waste or other approved wastes are exempt from permitting provided the facility meets all provisions of Section 22.801(e)(1) of APC&EC Regulation No. 22. Written notice of the facility is required by APC&EC Regulation No. 22.801(e)(1). See Attachment A of this permit for the *Exempt Small Composting Site*

*Notification Form.*

- E. Additional exemptions from permitting are outlined in APC&EC Regulation No. 22.801(e)(2), (3) and (4). Exemptions include individual residential composting of yard waste or organic waste generated at the residence, composting in conjunction with confined animal facilities, and composting in conjunction with nursery operations. Department notification is not required for sites which qualify for this exemption.
- F. Non-composting Material Recycling Facilities which accept yard waste, wood waste, or other wood or natural vegetative debris solely for processing and redistribution as a recovered material are not considered solid waste processors and are not required to obtain a permit. Material Recycling Facilities which plan to accept this material are considered a Type Y Material Recycling Facility (Type Y MRF). Type Y MRFs which accept yard waste are encouraged to register with ADEQ –Recycling Branch. Forms will be made available on the ADEQ website. Chapter 10 of APC&EC Regulation No. 22 discusses the MRF exemption and includes a discussion of a limitation of time which material may exist at a MRF before redistribution for recycling purposes.

**III. NOTICE OF INTENT (NOI)**

- A. Owners or operators of Type Y composting facilities located within the State of Arkansas who desire coverage under this general permit shall submit a notification to the Department indicating their intent to be covered under the terms of this general permit. Unless otherwise notified in writing by the Department, owners or operators are authorized to operate under this general permit thirty (30) days after ADEQ receipt of the notification. Facilities covered by the previous composting general permit are required to submit a new Notice of Intent (NOI) to obtain coverage under this permit or apply for an individual permit.
- B. Written notification for intent to be covered under the General Permit shall be made upon the latest version of NOI forms provided by the Department and available on the ADEQ website. All information required by the NOI form shall be provided.
- C. The NOI shall be signed by an authorized individual as defined in APC&EC Regulation No. 22.301(h) and signed and stamped by a registered professional engineer retained by the facility as required by APC&EC Regulation No. 22.301(i).
- D. The approved NOI and required attachments shall be considered an integral and enforceable part of this permit. Any modification to facility design or operation shall be updated through a revised NOI including attachments and submitted to the Department for approval. It shall be the sole decision of the Director whether the changes are eligible for continued coverage under this permit in accordance with section II.B.
- E. This general permit or site-specific coverage under this permit may be administratively changed; modified; revoked; reissued; or terminated for cause in accordance with the requirements of APC&EC Regulation No. 8 and APC&EC Regulation No. 22. The filing of

a request by a covered permittee for a facility modification does not stay any permit condition. Approval of any NOI which is in conflict with any permit condition or applicable regulation shall not be considered valid; covered permittees are bound to comply with this permit, APC&EC Regulation No. 22, and other applicable regulations.

- F. Any change in ownership or control of the operation of the facility will require submittal of a disclosure statement in accordance with APC&EC Regulation No. 8. Transfer of this permit will require submittal of a new NOI for coverage in accordance with this section. Transfer information also shall include the requirements of APC&EC Regulation No. 22.307. Failure to notify the Department of a change in ownership or control or of changes in responsibility for the operation of the facility will be cause for termination of coverage under this general permit.

#### **IV. DEADLINE FOR NOI SUBMITTAL**

- A. An NOI for coverage under this general permit shall be submitted:
  - 1. For existing facilities, not later than August 2, 2017. Existing facilities which submit an NOI to be covered under this general permit by August 2, 2017, will be allowed to continue operating until a decision has been reached by the Department to allow or deny coverage under this general permit.
  - 2. For new or planned facilities, a minimum of thirty (30) days prior to commencement of construction.
- B. Any Department Notification of Deficiency (NOD) or other information request shall be adequately fulfilled within thirty (30) days following the date of the NOD request or as specified in the request for information. Failure to submit adequate information in a timely manner shall be cause for Department termination of any coverage under this permit.
- C. Within sixty (60) days following submittal of the NOI for coverage under this general permit, the facility shall apply for coverage or be able to demonstrate coverage under the NPDES Industrial Stormwater General Permit (IGP) or another acceptable permit to cover stormwater discharges.

#### **V. TERMINATION OF COVERAGE**

- A. An owner or operator shall notify the Director if the facility ceases operation and/or if coverage under the general permit is no longer necessary. The Department shall be notified in writing sixty (60) days prior to the proposed termination date of the general permit.
- B. Within ten (10) days of ceasing operations, all residuals and wastes shall be removed from the site and disposed at a properly permitted disposal facility, and the facility and equipment shall be brought to a sanitary condition. The operator shall then arrange for a final cleaning of any containers, equipment, machines, floors, and facility surfaces having come in contact

with solid waste. All closure activities shall be completed no later than forty-five (45) days after the termination date of facility operations unless otherwise approved by the Department.

- C. Coverage under this general permit may be terminated at the discretion and upon notification by the Department if construction of the facility has not commenced within one hundred eighty (180) days and completed within three hundred sixty-five (365) days from the date of coverage provided under the general permit. Coverage under this general permit may be terminated at the discretion and notification by the Department if the facility fails to operate for sixty (60) consecutive calendar days. If the facility does not operate for sixty (60) consecutive calendar days the facility shall implement the procedures in this section and APC&EC Regulation No. 22.

## **VI. CONDITIONS FOR TYPE Y COMPOSTING GENERAL PERMIT**

- A. The Type Y composting facility shall be maintained and operated in accordance with the conditions of this permit and in compliance with all applicable provisions of the Ark. Code Ann. §8-6-201 *et seq.* as amended, APC&EC Regulation No. 22, and all other applicable rules and regulations.
- B. The permit holder shall pay an annual permit fee as specified in APC&EC Regulation No. 9.
- C. The Department has no responsibility for the adequacy or proper operation of the yard waste composting facility. Nothing herein shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the yard waste composting facility. The facility shall be operated by qualified personnel and maintained in good condition at all times.
- D. Any duly authorized officer, employee, or representative of the Department may enter without interference or unreasonable delay to inspect any facility covered by this permit or proposed for coverage by this permit. The agent may also enter any other satellite location, ancillary facility, location of compost application sites, or generally any other facility as necessary to determine compliance with APC&EC Regulation No. 22.
- E. The facility shall be in compliance with the following location restrictions:
  - 1. The facility shall be designed and operated in a manner that will not restrict the flow of the base flood, reduce the temporary water storage capacity of the floodplain, or result in washout of solid waste and/or finished compost so as to pose a hazard to human health, wildlife, land, or water resources.
  - 2. The facility or any facility expansion shall not be located in wetlands, or if it is, the owner of the facility shall demonstrate that the facility is in compliance with the provisions of the Clean Water Act and implementing regulations. To demonstrate compliance the



facility must provide wetlands delineation and any permit that may be required by the appropriate agency with jurisdiction for the proposed site.

3. The facility shall not be located within a municipality or county that has adopted restrictions on sites in conjunction with a comprehensive county-wide land use plan as provided in APC&EC Regulation No. 22.203 unless specific geographic site approval has been received from the government(s) of jurisdiction.
  4. Composting areas or areas used for storing incoming materials or finished compost shall not be located within the following setback distances:
    - a. Fifty feet (50') of the property boundary;
    - b. One hundred feet (100') from a naturally occurring surface water body, stream or streambed; and
    - c. Two hundred feet (200') feet to an existing residence, place of business or drinking water supply not owned or leased by the applicant.
  5. All components of siting location, design, construction, operation, maintenance, and closure shall be in accordance with any rules of the Regional Solid Waste Management District or rules of local zoning which may apply.
- F. The compost operation shall be conducted in a manner which prevents pollution, public health hazards, nuisances, odors, and the harborage of vectors.
- G. Operation of the facility shall follow acceptable methods of composting as described in the approved operating plan which result in the aerobic biochemical degradation of the organic material received. Operating methods employ active management of incoming materials according to the approved plans. Materials are routed to designated stockpiles with specified volumes and processed into compost according to timeframes specified in the plans. Operating methods include procedures or equipment for material sizing, methods of manipulating materials into or onto the specified processing area, and consideration of material types and mixture ratios. Operating methods include mixing or turning techniques or other methods to encourage aerobic conditions. Operating methods address proper moisture control, methods for monitoring product quality during and after processing, and methods for screening or selection procedures for processed materials to ensure a marketable or otherwise desirable finished product. Designated storage volumes and locations are specified for finished materials and should not be exceeded.
- H. Facilities shall develop and implement procedures in the approved operating plan for recording the amount of waste received and composted and this information shall be available for inspection by the Department.

- I. Facilities shall develop and implement contingency plans in the approved operating plan for the following items:
  1. The plan shall provide methods for controlling the type of waste received at the facility and for removing and recovering non-compostable materials for recycling or disposal including the removal, storage, and disposal of any hazardous or other unauthorized wastes;
  2. The plan shall provide that firefighting equipment is available at the site and ensure that personnel have been trained in firefighting procedures. Where possible, the facility shall assure that fire protection services are available to the site through notification to local fire protection officials;
  3. The plan shall provide remedial and contingency measures in the case that unapproved wastes are delivered to the facility or in the event of odors, equipment breakdown, and other emergency or undesirable conditions such as fire, dust, and vectors.
  4. The plan shall provide any safety equipment that may be necessary due to site operations.
- J. All operations shall be supervised by a licensed on-site operator who is certified in accordance with APC&EC Regulation No. 27 during all hours of operation, and access to the facility shall be prohibited during non-operating hours.
- K. A written operating record shall be maintained. Records shall include at a minimum:
  1. Monitoring results of stormwater runoff and/or site discharges as required by facility NPDES permit(s);
  2. This permit, all approved NOI submittal documents for this permit, permit design drawings, operating plan and narrative including closure plan, modifications, annual reports, and Department correspondence;
  3. Facility operating records as required by APC&EC Regulation No. 22.808(a);
  4. Quantity, type, and source of incoming waste on a monthly basis;
  5. Quantity of compost sold or distributed on a monthly basis;
  6. Quantity of residue removed for disposal and the date and location of disposal;
  7. Any testing data including sampling information, chain of custody, and sample results that may be taken of compost products generated at the site; and
  8. Any other records required by APC&EC Regulation No. 22.
- L. The facility shall be operated in accordance with the provisions of the site-specific Operating Plan as approved by the Department and which meets all requirements of APC&EC Regulation No. 22, Chapter 8. Non-composting activities or areas used for processing or storage of source-separated recovered materials shall also be depicted in facility plans and

described in the operating plan. All changes to the site-specific Operating Plan must be approved in writing by the Department.

- M. The facility shall be constructed in accordance with the Design Narrative and Permit Plans and Specifications as approved by the Department and which meets all requirements of APC&EC Regulation No. 22, Chapter 8. Any changes to the approved design for the facility must be approved in writing by the Department prior to implementation.
- N. The composting area shall have a surface that can withstand heavy equipment loads and shall be sloped to prevent ponding of water.
- O. The facility shall be designed with stormwater management controls to meet State and Federal regulations and to prevent stormwater run-on from entering the receiving, processing, curing, and storage areas.
- P. Restricted access to the site shall be maintained through the use of fences, gates, warning signs, natural barriers, or other means described in the approved NOI documents.
- Q. The facility design shall include all-weather access roads for vehicle movement within the site and clearly illustrate operational receiving, processing, production, curing, and storage areas.
- R. The facility shall post a sign with the name of the facility, permit number, emergency phone number, opening and closing hours, and days of operation at the entrance of the facility.
- S. The facility shall implement methods for controlling odor, noise, dust, vectors, litter or other nuisance or safety conditions including fire hazards.
- T. The facility shall have sufficient capacity to handle incoming materials and the storage of 6 months production of finished compost. Methods to handle and remove unacceptable wastes delivered to the facility shall be included in facility design.
- U. All areas of the permitted facility shall have positive run-off drainage, shall be free of standing water, and shall route water in accordance with the approved NPDES stormwater permit and according to the NOI filed for coverage under this permit. Facilities shall follow the current Stormwater Pollution Prevention Plan (SWPPP); facilities shall implement necessary Best Management Practices (BMPs) for stormwater, and perform the discharge monitoring and reporting requirements according to all NPDES stormwater or other discharge permits.

- V. New facilities shall not commence construction or operation without required stormwater or discharge permit coverage or documentation that a permit or permits is not required. Existing facilities are required to obtain necessary stormwater or discharge permit within sixty (60) days according to Section IV.C of this permit.
  
- W. The owner or operator shall prepare and file an annual report with the Department by March 31 of each year. The report shall cover the previous January through December and shall include at a minimum the following items:
  - 1. Monitoring results of stormwater runoff/or site discharges as required by facility NPDES permits;
  - 2. A summary narrative of any changes to site design, changes in operations, or necessary maintenance or remedial measures taken at the facility during the past reporting period;
  - 3. Quantity, type, and source of incoming waste on a monthly basis;
  - 4. Quantity of compost sold or distributed on a monthly basis;
  - 5. Quantity of residue removed for disposal, and the date and location of disposal; and
  - 6. Any other information which may affect compliance with APC&EC Regulation No. 22.
  
- X. The owner or operator of the facility shall notify the Department in writing within sixty (60) days prior to the proposed termination date of the facility. Within ten (10) days of ceasing operations, all residuals, waste, etc. shall be removed from the site and disposed and all requirements of section V.B of this permit shall be met.
  
- Y. The facility shall conform to the requirements in the approved Closure Plan which is on file with or referenced by the approved NOI documents. The approved closure plan shall meet the provisions of APC&EC Regulation No. 22.804(b)(9) and 22.810.
  
- Z. Owners and operators of permitted compost facilities shall post financial assurance in accordance with APC&EC Regulation No. 22. The method for furnishing the required amount of Financial Assurance shall be in accordance with APC&EC Regulation No. 22.1405.
  
- AA. Cost estimates for financial assurance shall be calculated and certified by the professional engineer registered in the state of Arkansas which has been retained to provide design services for the purpose of this permit. The engineer, on behalf of the applicant, shall complete the Cost Estimate Summary Form included within the NOI form or attach a detailed cost estimate to the NOI form. The engineer shall include the maximum proposed amounts of all wastes and recovered materials anticipated to exist on-site during the life of this permit. The engineer shall provide the cost estimate for third-party removal and/or disposal of each item which is reflective of the cost the Department would incur in the event of site

abandonment. The estimate shall be multiplied by the factor of one hundred fifty percent (150%) as indicated by APC&EC Regulation No. 22.810(c)(2). The form shall be certified by a professional engineer. The specific materials and amounts listed on the approved form or separate detailed estimate shall be considered limiting conditions for the site and are an integral part of this permit.

BB. Financial assurance funds may be used by the Department, as determined by the Director, for any reasonable purpose to remediate and mitigate any environmental, health, or safety hazard at the site should the owner or operator be unable or unwilling to fulfill the permit obligations of this general permit.

Attachment A. – Exempt Small Composting Site Notification Form  
Permit No. 0000-SCYW



## Exempt Small Composting Site Notification Form

**Name of Owner/Operator:**

**Owner/Operator Mailing Address:**

**Contact Name and Phone Number:**

### REQUIREMENTS

Per APC&EC Regulation No. 22.801(e)(1) – Facilities are limited to less than 50 tons or 500 yards per year of incoming material for composting.

Per APC&EC Regulation No. 22.801(e)(1)(i) – The process must follow acceptable methods of composting and is developed, operated and maintained in a safe, nuisance free manner.

Per APC&EC Regulation No.22.801(e)(1)(ii) – The facility shall provide a written notice to the Department describing the facility location, description of the operation and intended end use for the compost prior to commencement of construction.

### OPERATION DESCRIPTION

Describe facility location, address, county, latitude and longitude, maps may be included:

List incoming composting materials:

Provide amount of incoming wastes to be composted per year:

Select: **yards** or **tons**

Describe the method(s) for composting:



List equipment and typical personnel necessary in the composting operation.	
Estimated time to compost incoming wastes into finished product:	
Maximum wastes and finished material on site at any time:	Select: <b>yards</b> or <b>tons</b>
List the proposed end use:	
Owner/Operator Signature and Title:	
<b>Submit To: ADEQ – Office of Land Resources  Regulated Waste Operations  5301 Northshore Drive  North Little Rock, AR 72118</b>	

**FACT SHEET**

**YARD WASTE COMPOSTING FACILITY  
(TYPE Y COMPOSTING FACILITY)  
GENERAL PERMIT**

In accordance with provisions of the Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 8.207, public notice was given that the Arkansas Department of Environmental Quality (ADEQ) has made a decision to issue a general permit for the operation of yard waste composting facilities.

Final General Permit 0000-SCYW is hereby issued for eligible yard waste composting facilities. This permit would apply to facilities as described below and as further defined in APC&EC Regulation No. 22.

The Yard Waste Composting Facility General Permit will be available to cover facilities located in the State of Arkansas which choose to be covered by the General Permit, meet the terms of the Permit, and comply with restrictions of APC&EC Regulation No. 22. APC&EC Regulation No. 22 defines composting as the deliberate aerobic decomposition of waste into a stable humus-like material. Yard waste and other Type Y compost material are the only acceptable materials eligible for processing under this permit. Yard waste is defined as grass clippings, leaves, and shrubbery trimmings. Type Y compost material is defined as yard waste or other vegetative materials such as tree prunings or chipped brush.

Coverage under General Permit 0000-SCYW may be obtained by submitting a Notice of Intent (NOI) for coverage under the General Permit for the construction and operation of a Yard Waste Composting Facility. The NOI form must be completed for all current permittees in order to maintain coverage under the General Permit 0000-SCYW.

The Proposed General Permit was placed into public notice on March 29, 2017. The end of the public comment period will be April 28, 2017. All comments received during the public comment period will be addressed in the final permit decision.





**ECONOMIC IMPACT - ENVIRONMENTAL BENEFIT  
YARD WASTE COMPOSTING FACILITY  
(TYPE Y COMPOSTING FACILITY)  
Permit No. 0000-SCYW**

A requirement of Act 731 of the 88<sup>th</sup> General Assembly, 2011, requires the Department to consider economic impact and environmental benefit. The new requirements are codified in Ark. Code Ann. §8-4-203(m) as follows:

<b>8-4-203(m)</b>	<b>Requirement</b>
<b>(3)(A)(i)</b>	Before the submittal to public comment of a general permit that has not been previously issued, the department shall consider the economic impact and environmental benefit of the general permit and its terms and conditions upon the people of the State of Arkansas, including those entities that may apply for coverage under the general permit.
<b>(3)(A)(ii)</b>	This requirement does not apply to general permits or terms or conditions that adopt the language of state or federal statutes or regulations without substantive change.
<b>(3)(B)</b>	If the terms and conditions of a previously issued general permit are revised upon renewal, the economic impact and environmental benefit of only the proposed changes shall be considered.
<b>(3)(C)</b>	A general permit for which costs are specifically prohibited from being considered by state or federal law or regulation is exempt from the requirements of this subsection.
<b>(3)(D)</b>	The department may rely upon readily available information for its consideration of the economic impact and environmental benefit of the general permit and its terms and conditions.

Following is a discussion of applicability of the general permitting requirements to this permit decision:

<b>8-4-203(m)</b>	<b>Applicability</b>
<b>(3)(A)(i)</b>	The Yard Waste Composting Facility General Permit has been previously issued and has been in existence since 1995.
<b>(3)(A)(ii)</b>	The language contained in the specific condition is derived directly from Regulation 22 or is a specific requirement of Regulation 22.
<b>(3)(B)</b>	The terms and intent of the general permit have not changed materially from past revisions.
<b>(3)(C)</b>	N/A
<b>(3)(D)</b>	N/A

Following is a discussion of the major clarification updates in this permit decision:

Permit No. 0000-SCYW

There have been no clarification updates in the General Permit. The only changes are reference corrections and renumbering of sections.

\*\*\*

# ADEQ

ARKANSAS  
Department of Environmental Quality

October 17, 2008

City of Little Rock, Department of Public Works  
Attn: Mr. Warren Atkins  
10803 Ironton Cutoff  
Little Rock, AR 72206

**Re: Issuance of Individual Permit for the City of Little Rock, Yard Waste Compost Facility**  
**Final Permit: 0031-SCYWAFIN: 60-01071**  
**Document ID: 53853; Reference # 35499**

Dear: Mr. Atkins:

Enclosed is a permit authorizing for the construction, operation, and maintenance of City of Little Rock Solid Waste Type CY Composting Facility as described in your revised application submitted on July 1, 2008. The permit number for the facility is 0031-SCYW. The decision to issue the permit is based upon 1) the information contained in the permit application; 2) other materials submitted by the applicant, 3) written comments received during the designated 30-day public comment period (no comment has received).

The permit is granted subject to the terms and conditions specified in the permit. The initial amount of financial assurance required is \$118,687 for the facility. Acceptable mechanisms for financial assurance include a surety bond, collateral bond (supported by a letter of credit, securities or cash), or other mechanisms as set forth in Chapter Fourteen of Regulation Number 22. The instruments used must be in the exact form set forth in Regulation Number 22 and must be filed with the Department before the permit can become effective. The purpose of the financial assurance is to ensure an environmentally sound closure of the site upon conclusion of disposal operations and acceptable post closure care. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

Operations authorized under this permit may begin only after written notification from this Department is sent to the permittee that the following items have been submitted and approved by the Department: a) financial assurance, b) construction quality assurance test results, c) engineering certification of initial construction, and d) as-built drawings of initial construction. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

Any person with legal standing in this matter may appeal the Department's final decision to the Arkansas Pollution Control and Ecology Commission. Appeals must be in writing, must be filed within thirty (30) days of the Department's final decision, and must conform to all applicable laws and regulations. General information on appeal procedures may be obtained by contacting the Legal Division of the Department, at 501-682-0892.

Thank you for your cooperation on this matter. If you have any questions, or if we may be of service, please feel free to contact the Solid Waste Management Division at (501) 682-0602.

Sincerely,



Mike Robinson, Chief  
Solid Waste Management Division

Enclosures: Permit  
Permit Summary and Rationale

cc: Bryan Leamons P.E., Engineer Supervisor  
Kenneth Burks, Inspector

## **Response to Comments**

On March 20, 2008 the Arkansas Department of environmental Quality issued a draft permit associated with the construction and operation of the City of Little Rock Type CY Composting Facility. After the close of the thirty (30) day comment period the ADEQ-SWMD received a comment from the facility (Document ID# 53661). The following is the SWMD response to the facility comment.

### **Comment 1 received from the City of Little Rock:**

Comment was made to change the wording under the Section 2, item c of the Draft Permit Site Specific Conditions from "cessation of disposal operations" to "cessation of composting operations."

### **Response to Comment1:**

The requested changes have been made.



**PERMIT  
FOR THE CONSTRUCTION AND OPERATION OF A  
SOLID WASTE COMPOST FACILITY**



**ISSUED BY  
STATE OF ARKANSAS  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOLID WASTE MANAGEMENT DIVISION**

**Type CY – YARD WASTE COMPOST FACILITY**

Permit Number	<b>0031-SCYW</b>
AFIN	<b>60-01071</b>
Effective Date	October 17, 2008
Expiration Date	October 17, 2018
Permit Owner & Address	City of Little Rock, Department of Public Works 10803 Ironton Cutoff Little Rock, AR 72206
Facility Site Name & Address	City of Little Rock, Department of Public Works 10803 Ironton Cutoff Little Rock, Ar 72206
Location	Section 9 T1 R12 W in Pulaski County, Arkansas
Financial Assurance	\$118, 687
Latitude/Longitude	92°18.06'42.839"/ 34°18.38'57.025"
Design Engineer/Consultant	City of Little Rock, Department of Public Works

This permit authorizes the construction and operation of the solid waste compost facility as set forth in the permit application prepared by the City of Little Rock, Department of Public Works, hereinafter called "owner" or "permittee," and received by the Department of Environmental Quality on July 14, 2006. The application was completed through a series of documents furnished by the applicant on July 14, 2006 and DOC ID # 35499, and January 15, 2008 DOC ID# 51311, and July 1, 2008 and DOC ID# 53152. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the "Act;" Regulation Number 22, Arkansas Solid Waste Management Code, as adopted by the Pollution Control and Ecology Commission, hereinafter called Regulation 22; and all other applicable rules and regulations of the Department of Environmental Quality, hereinafter called "Department", and the following terms and conditions:



**GENERAL CONDITIONS FOR A TYPE CY – SOLID WASTE COMPOST FACILITY**

1. The yard waste composting facility shall be maintained and operated in accordance with the conditions of this permit and in compliance with all applicable provisions of the Arkansas Code Annotated §§ 8-6-201 et. Seq. as amended, Regulation 22, and all other applicable rules and regulations.
2. This general permit may be modified, revoked and reissued, or terminated for cause in accordance with the requirements of Arkansas Pollution Control and Ecology Commission Regulations No. 8 and No. 22. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes, does not stay any permit condition.
3. The permit holder shall pay an annual permit fee as provided in Regulation 9.
4. Any change in ownership or control of the operation of the facility will require submittal of a disclosure statement in accordance with Arkansas Code of 1987 Annotated 8-1-106 and Regulation Number 8 of the Arkansas Pollution Control and Ecology Commission. Transfer of this permit will require submittal of request for permit transfer in accordance with Regulation 22.307. Failure to notify the Department of a change in ownership or control, or a change in responsibility for the operation of the compost facility will be cause for termination of coverage under this permit.
5. The Department has no responsibility for the adequacy or proper operation of the yard waste composting facility. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the yard waste composting facility. The facility shall be operated by qualified personnel and maintained in good condition at all times.
6. Whenever it shall be necessary for the purpose of implementing or monitoring the enforcement of any permit condition, law or regulation duly adopted by the Arkansas Pollution Control and Ecology Commission, any authorized employee or agent of the department may enter the facility property for the purpose of obtaining information, conducting investigations or inspections, taking of samples, or examining and copying records pertaining to the operation of the facility. Investigations or inspections by authorized employees or agents shall be conducted without interference or delay from the permittee or the property owner, and will be conducted during daylight, during regular business hours; or, under emergency or extraordinary circumstances, at a time necessary to observe the suspected violation or unauthorized conduct.
7. This permit shall be posted in a conspicuous location at the yard waste composting facility during all operating hours.
8. All facilities shall have some written means of recording the amount of waste received and composted and this information shall be available for inspection by the Department.
9. Facilities must develop and implement written procedures for controlling the type of waste received at the facility and for removing and recovering non-compostable materials for recycling or disposal including the removal, storage and disposal of any hazardous or other unauthorized wastes.
10. The yard waste composting facility shall obtain a storm water permit from the Water Division of the Department or demonstrate that a permit is not required. Storm water controls shall be implemented to prevent run-on from entering receiving, processing, curing, or storage areas.
11. Access to the site shall be controlled through the use of fences, gates, natural barriers or other means approved by the Department. All weather access roads and signage shall be provided to facilitate traffic movement.
12. The yard waste composting facility shall be operated so as to prevent odors, litter, and the attraction, harborage or breeding of insects, rodents and other vectors.

13. The owner or operator shall assure that fire fighting equipment is available at the site and personnel have been trained in fire fighting procedures. Where possible, the facility shall assure that fire protection services are available to the site through notification to local fire protection officials.
14. The owner or operator shall implement remedial and contingency measures if unapproved wastes are delivered to the facility or in the event of odors, equipment breakdown, and other emergency or undesirable conditions such a fire, dust, and vectors.
15. The owner or operator shall provide any necessary safety equipment that may be necessary due to site operations.
16. Operation of the facility shall follow acceptable methods of composting which result in the aerobic biochemical degradation of the organic material received.
17. All operations shall be performed by licensed on-site operators who are certified in accordance with Regulation No. 27 of the Commission during all hours of operation, and access to the facility shall be prohibited during non-operating hours.
18. The composting area and raw and finished compost storage areas shall have a surface that can withstand heavy equipment loads, and shall be sloped to drain.
19. Annual Reports – The facility shall submit an annual report to the Department covering a reporting period from January through December, and shall be submitted to the Department by March 31 of each year covering the previous reporting period. The report shall include:
  - a. Volume or weight of yard waste material received at the facility;
  - b. Volume or weight of material removed from the facility for disposal and disposal location;
  - c. The source of the compost material identified by service area; and,
  - d. Amount and Consumer of Finished Compost material.
20. The owner/operator of the facility shall keep and retain records of operations which shall be available for inspection by the Department. Records shall include at a minimum:
  - a. Monitoring results of stormwater runoff and/or site discharges as required by facility NPDES permits.
  - b. Permit, annual reports, and Department correspondence.
  - c. Quantity, type and source of incoming waste on a monthly basis.
  - d. Quantity, of compost sold or distributed on a monthly basis.
  - e. Quantity of residue removed for disposal, and the date and location of disposal.
  - f. Any testing data including sampling information, chain-of-custody, and sample results that may be taken of compost products generated at the site.
21. Use of Financial Assurance Funds - Financial assurance funds may be used, as determined by the Director, for any reasonable purpose to remediate and mitigate any environmental, health, and safety hazards at the site should the owner or operator be unable or unwilling to fulfill the permit obligations of this permit.
22. Owners or operators shall notify the Director if the facility ceases operation and/or if coverage under the permitted is no longer necessary. The Department shall be notified in writing sixty (60) days prior to the proposed termination date of the permit.
23. Within ten (10) days of ceasing operations, all wastes shall be removed from the site and disposed at a properly permitted disposal facility, and the facility and equipment shall be brought to a sanitary condition. The operator shall then arrange for a final cleaning of any containers, equipment, machines, floors, and facility surfaces having come in contact with solid waste. All closure activities shall be completed not later than 45 days after the termination date of facility operations unless otherwise approved by ADEQ.

24. Coverage under this permit shall automatically terminate unless construction of the disposal facility has been commenced within 180 days and completed within 365 days from coverage under the general permit unless otherwise specified by this permit. Coverage under this permit shall be considered terminated if the facility fails to operate for sixty consecutive calendar days unless written extension is granted by ADEQ.

#### SITE SPECIFIC CONDITIONS

1. The approved application document is filed under the Document Identification Number 35499.
2. The Owner/Operator shall provide to the Department financial assurance for this facility in the amount of \$118, 687. An acceptable financial assurance mechanism in accordance with Chapter Fourteen of Regulation 22 will be maintained by the Owner/Operator.
  - a. The instruments used must be in one of the forms set forth in Regulation 22 or as otherwise approved by the Department.
  - b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Department.
  - c. A portion or all of the financial assurance may be held by the Department beyond the time of cessation of composting operations at the site to ensure satisfactory closure and post closure care in accordance with Regulation 22.
3. This site is limited to 20, 000 tons / yards>> of total waste received annually.
4. No more than 76 tons/ day of finished compost may be stored at the site and any excess amounts must be removed for use or disposal.

**APPROVED BY:**            **Arkansas Department of Environmental Quality**  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Mike Robinson for Teresa Marks

For Teresa Marks

10-17-2008

Date

#### CERTIFICATE OF SERVICE

I, Monica Padman hereby certify that a copy of this permit has been mailed by first-class mail to Mr. Warren Atkins, 10803 Ironton Cutoff, Little Rock, AR 72206, on or before this 17<sup>th</sup> day of Oct., 2008.

**Permit Application Summary and Rationale**  
**City of Little Rock, Department of Public Work**  
**Permit No. 0031-SCYW; AFIN No. 60-01071**

**Permit Application Summary**

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Solid Waste Management Division. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

<b>Permit Application Summary</b>	
Name and mailing address of Applicant:	City of Little Rock, Department of Public Work 10803 Ironton Cutoff Little Rock, AR 72206
Type of Facility:	CY
Engineering Firm:	City of Little Rock, Department of Public Work
Application Date:	
Site Location	General: Take Highway 530 to Pine Bluff, exit at Dixon Road, travel west on Dixon Rd. 3 miles, turn south on Ironton Cutoff 0.5 miles  Specific: - Section 9 T1S R12W
RSWMD	The facility will serve the City of Little Rock, Residences, Streets, and Parks
Site meets 22.803 siting requirements?	Y/N

**Permit Conditions Rationale**

<b>Rationale For 0031-SCYW General Permit Conditions</b>	
<b>Condition No.</b>	<b>General Conditions</b>
1	Lists applicable APC&EC Regulations. The list is not all inclusive.
2	Permit may be modified or revoked. [§22.308(f), §22.309(e)]
3	Annual fee required. [§9.604]
4	Details transfer provisions. [§22.307]
5	Department is not responsible for adequacy, operation, or proper functionality. Licensed operators required. [A.C.A. 8-6-201 et seq., §22.904(h)]
6	Department reps have right to entry. [§22.1501]
7	Post this permit on-site. [§22.808]
8	Site must be able to track waste. [§22.806]
9	Site must follow operating narrative. [§22.805(b)(2)]
10	Site must have necessary water permits. [§22.806, 22.807]
11	Site must have access control. [§22.806]
12	Site must control odors, vectors and litter. [22.806]
13	Site must address operational fire safety. [§22.805]
14 - 18	Site must operate in accordance with design narrative and with adequate equipment. [§22.805]
19 - 20	Annual reporting and recordkeeping is required. [§22.808]
21	Financial assurance is required [§22.810]
22 - 23	Timeframes are applicable to this permit. [§22.810]
24	Timeframes are applicable to this permit. [§22.309(d)]

<b>Rationale For Site Specific Conditions for 0031-SCYW</b>	
<b>Condition No.</b>	<b>Conditions</b>
1	Site must operate in accordance with approved application materials. [§22.805]
2	Site must maintain \$118, 687 in financial assurance. [§22.810, §22.1401]
3	Waste receipt is limited. Increases in capacity may require site design changes that would necessarily require review. Increases may be performed through the minor modification process at the sole discretion of the Director. [§22.806]
4	Storage Capacity is limited [22.805]

This document was prepared by Ali Dorobati, Engineer.

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# ADEQ

ARKANSAS  
Department of Environmental Quality

February 23, 2011

Mr. Warren Atkins  
City of Little Rock, Department of Public Works  
10803 Ironton Cutoff  
Little Rock, AR 72206

**RE: Administrative Permit Modification – Revised Permitted Capacity  
City of Little Rock Compost Facility  
Solid Waste Permit # 0031-SCYW; AFIN # 60-01071  
Document Identifier # 59288 Cross Reference Identifier # 58777**


Dear Mr. Atkins:

The Arkansas Department of Environmental Quality-Solid Waste Management Division (ADEQ-SWMD) has received your request to increase permitted capacity for the above referenced permit for the City of Little Rock Compost Facility. Previous applications listed both 20,000 and 30,000 tons per year as the design capacity. This modification is provided to correct these discrepancies.

The ADEQ-SWMD hereby provides this administratively modified permit. Attached is an addendum to permit for the City of Little Rock Compost facility.

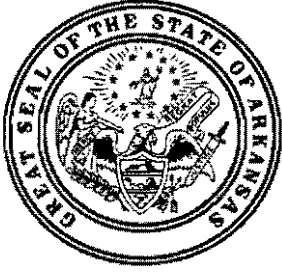
Please call me at 501-682-0600 should you have any questions regarding the above information.

Sincerely,



Roger Lawrence  
Chief, SWMD

cc: Bryan Leamons P.E., Engineer Supervisor  
Susan Speake, Programs Branch Manager, SWMD  
Lori Burke, Inspector, SWMD



ADDENDUM TO PERMIT

STATE OF ARKANSAS

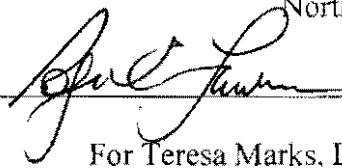
DEPARTMENT OF ENVIRONMENTAL QUALITY

SOLID WASTE MANAGEMENT DIVISION

CITY OF LITTLE ROCK, DEPARTMENT OF PUBLIC WORKS		AFIN:	60-01071
Type Y Compost Facility		Permit No:	0031-SCYW
Application Reference (Date/Doc ID)	Description of Addendum to Permit		
1/4/2011 Doc.# 58777	Pursuant to APC&EC Regulation 22.308(f), permitted capacity is corrected to reflect design capacity. The previous permit contain an incorrect capacity limit because of inconsistencies in previous permit application materials.		

Amended Site Specific Permit Condition	
3	The following shall replace the condition 3 of site specific condition of the permit: <b>Site Specific Condition 3:</b> This site is limited to 30,000 tons/year of the total waste received annually.

APPROVED BY: Arkansas Department of Environmental Quality  
 5301 Northshore Drive  
 North Little Rock, AR 72118-5317.

  
 \_\_\_\_\_  
 For Teresa Marks, Director

2/23/2011  
 \_\_\_\_\_  
 Date

CERTIFICATE OF SERVICE

I Barbara Mathews hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. Warren Atkins, City of Little Rock Department of Public Works, 10803 Ironton Cutoff, Little Rock, AR 72206 on or before this 24th day of February, 2011

# ADEQ

ARKANSAS  
Department of Environmental Quality

August 29, 2014

Mr. Warren Atkins  
City of Little Rock, Department of Public Works  
10803 Ironton Cutoff  
Little Rock, AR 72206

**RE: Administrative Permit Amendment – Updated Operation of the Compost Facility  
City of Little Rock Compost Facility  
Solid Waste Permit # 0031-SCYW; AFIN # 60-01071  
Document Identifier # 66195 Cross Reference Identifier # 66106**

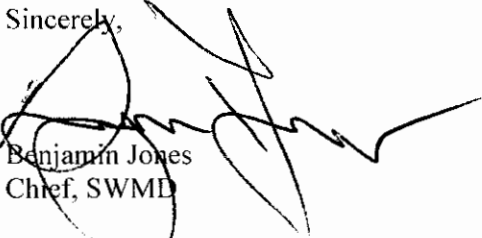
Dear Mr. Atkins:

The Arkansas Department of Environmental Quality-Solid Waste Management Division (ADEQ-SWMD) has received your request to remove the site throughput limit (Specific Condition 3) for the above referenced permit for the City of Little Rock Compost Facility. The facility has requested relief from Specific Condition 3 which currently limits the facility to 30,000 tons per year of annual waste acceptance. The basis for the request is updated facility operating methods which dedicate an increasing amount of wood waste throughput to grinding for non-composting recycling purposes such as boiler fuel, mulch, or alternative daily cover materials for the Class 1 landfill. Operation in this manner decreases the on-site storage time enabling larger quantities of material flow on an annual basis than previously considered in the original design estimates.

The ADEQ-SWMD hereby provides this administratively modified permit. Attached is an addendum to the permit for the City of Little Rock Compost facility which includes a revised permit Specific Condition 3.

Please call me at 501-682-0600 should you have any questions regarding the above information.

Sincerely,



Benjamin Jones  
Chief, SWMD

cc: Bryan Leamons P.E., Engineer Supervisor  
Susan Speake, Programs Branch Manager, SWMD  
Scott McWilliams, Enforcement Branch Manager, SWMD



**ADDENDUM TO PERMIT**

**ISSUED BY  
STATE OF ARKANSAS**

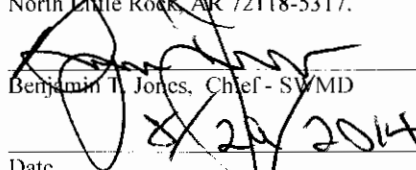
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**SOLID WASTE MANAGEMENT DIVISION**

<b>CITY OF LITTLE ROCK, DEPARTMENT OF PUBLIC WORKS</b>		<b>AFIN:</b>	<b>60-01071</b>
<b>Type Y Compost Facility</b>		<b>Permit No:</b>	<b>0031-SCYW</b>
<b>Application Reference (Date/Doc ID)</b>	<b>Description of Addendum to Permit</b>		
<b>2/26/2014 Doc.# 66106</b>	Pursuant to APC&EC Regulation 22.308(f), the permitted capacity for this composting facility remain the same but clarification is provided that waste throughput records need not include materials destined for recycling outside of the on-site composting operation. According to Reg. 22.801 (e) (5), the recovery and use of chipped, shredded or processed wood waste, excluding yard waste, for reuse as a mulch, composting material or other beneficial use are exempt from permitting.		
<b>Amended Site Specific Permit Condition</b>			
<b>3</b>	The following shall replace Specific Condition 3 previously provided in the permit addendum dated February 23, 2011 and all other versions of this condition:  <b>New Specific Condition 3:</b>  This composting operation is limited to 30,000 tons/year of the total waste received annually. Incoming wood debris or other acceptable type Y compost material tonnage which is ground and re-distributed for recycling purposes other than the on-site composting operation are not counted towards the total waste acceptance. The facility shall update record keeping procedures required by General Condition 8 to include tracking the total volume of waste received and the tonnage of the recycled wood products shipped from the facility on an annual basis. This tracking will enable compliance demonstration of the 30,000 tons per year limit.		
<b>Statement of Basis - Permit Conditions Rationale</b>			
<b>3</b>	Composting site waste receipt is limited. Increases in capacity may require site design changes that would necessarily require review. [§22.806]  The facility operates on-site grinding of recyclable wood debris and distributes the material in lieu of completing the composting process. This includes the current use of the material in the Class 1 landfill for alternative daily cover as specified by landfill permitting correspondence. This recycling activity was not considered in the original composting facility design capacity estimates. Debris grinding activities for mulch or other recovered use are not required to be permitted and the recycling material tonnage records are not counted toward the 30,000 ton permit limit. 22.801(e)(5) and 22.103(i)		
<b>8</b>	Facility must maintain a records system to track waste. [§22.808] Additionally, records of ground recyclable wood distribution shall be included as needed in the tracking system to demonstrate compliance with composting permit limits.		

APPROVED BY:

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

  
Benjamin T. Jones, Chief - SWMD

Date

*2/26/2014*

CERTIFICATE OF SERVICE

I Barbara Mathews hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. Warren Atkins, City of Little Rock Department of Public Works, 10803 Ironton Cutoff, Little Rock, AR 72206 on or before this 29th day of August, 2014

# ADEQ

ARKANSAS  
Department of Environmental Quality

September 16, 2014

Mr. Warren Atkins  
City of Little Rock, Department of Public Works  
10803 Ironton Cutoff  
Little Rock, AR 72206

RE: **Administrative Permit Amendment – Updated Operation of the Compost Facility  
City of Little Rock Compost Facility  
Solid Waste Permit # 0031-SCYW; AFIN # 60-01071  
Document Identifier # 66195 Cross Reference Identifier # 66106**

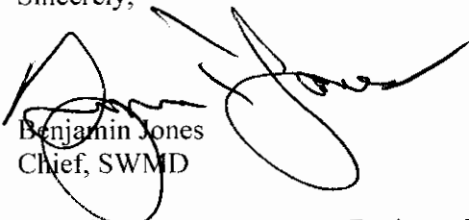
Dear Mr. Atkins:

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The ADEQ-SWMD hereby provides this administratively modified permit. Attached is an addendum to the permit for the City of Little Rock Compost facility which includes a revised permit Specific Condition 3.

Please call me at 501-682-0600 should you have any questions regarding the above information.

Sincerely,



Benjamin Jones  
Chief, SWMD

cc: Bryan Leamons P.E., Engineer Supervisor  
Susan Speake, Programs Branch Manager, SWMD  
Scott McWilliams, Enforcement Branch Manager, SWMD

**ADDENDUM TO PERMIT**

**ISSUED BY  
STATE OF ARKANSAS**

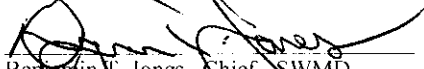
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

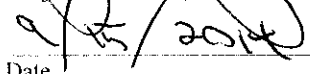
**SOLID WASTE MANAGEMENT DIVISION**

<b>CITY OF LITTLE ROCK, DEPARTMENT OF PUBLIC WORKS</b>		<b>AFIN:</b>	<b>60-01071</b>
<b>Type Y Compost Facility</b>		<b>Permit No:</b>	<b>0031-SCYW</b>
<b>Application Reference (Date/Doc ID)</b>	<b>Description of Addendum to Permit</b>		
<b>2/26/2014 Doc.# 66106</b>	Pursuant to APC&EC Regulation 22.308(f), the permitted capacity for this composting facility remain the same but clarification is provided that waste throughput records need not include materials destined for recycling outside of the on-site composting operation. According to Reg. 22.801 (e) (5), the recovery and use of chipped, shredded or processed wood waste, excluding yard waste, for reuse as a mulch, composting material or other beneficial use are exempt from permitting.		
<b>Amended Site Specific Permit Condition</b>			
<b>3</b>	The following shall replace Specific Condition 3 previously provided in the permit addendum dated February 23, 2011 and all other versions of this condition:  <b>New Specific Condition 3:</b>  This composting operation is limited to 30,000 tons/year of the total waste received annually. Incoming wood debris or other acceptable type Y compost material tonnage which is ground and re-distributed for recycling purposes other than the on-site composting operation are not counted towards the total waste acceptance. The facility shall update record keeping procedures required by General Condition 8 to include tracking the total volume of waste received and the tonnage of the recycled wood products shipped from the facility on an annual basis. This tracking will enable compliance demonstration of the 30,000 tons per year limit.		
<b>Statement of Basis - Permit Conditions Rationale</b>			
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<b>8</b>	Facility must maintain a records system to track waste. [§22.808] Additionally, records of ground recyclable wood distribution shall be included as needed in the tracking system to demonstrate compliance with composting permit limits.		

APPROVED BY:

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

  
Benjamin V. Jones, Chief - SWMD

  
Date

CERTIFICATE OF SERVICE

I Barbara Mathews hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. Warren Atkins, City of Little Rock Department of Public Works, 10803 Ironton Cutoff, Little Rock, AR 72206 on or before this 16<sup>th</sup> day of September, 2014