

Blue, Karen

From: Cusher, Annette
Sent: Thursday, April 30, 2020 9:19 AM
To: Blue, Karen
Subject: Fw: Little Rock Compost Facility 2019 AEIR (60-01071/0031-SCYW)
Attachments: 2019 Little Rock Composting Facility AEIR 2020-04-30.pdf

From: Jason Ghidotti <jjg@ftn-assoc.com>
Sent: Thursday, April 30, 2020 9:18 AM
To: Cusher, Annette
Cc: Charles, Nathan; Atkins, Warren; Kyle Templet
Subject: Little Rock Compost Facility 2019 AEIR (60-01071/0031-SCYW)

Ms. Cusher,

FTN is pleased to submit the attached Annual Engineering Inspection Report for the above referenced facility. Please contact me if you have any questions.

Sincerely,
Jason

Jason J Ghidotti, PE*
FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, Arkansas 72211
(501)225-7779
*Arkansas

Rec'd Digitally	
AFIN: 60-01071	
PMT#: 0031-SCYW	
RECEIVED <small>By Karen Blue at 12:53 pm, Apr 30, 2020</small>	
DOC ID#: 78233	
TO: AC>FILE <KMB	
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water resources / environmental consultants

**2019 ANNUAL REPORT
CITY OF LITTLE ROCK
YARD WASTE COMPOST FACILITY
PERMIT NO. 0031-SCYW, AFIN: 60-01071**

APRIL 29, 2020

2019 ANNUAL REPORT
CITY OF LITTLE ROCK
YARD WASTE COMPOST FACILITY
PERMIT NO. 0031-SCYW, AFIN: 60-01071

Prepared for

City of Little Rock
Department of Public Works
Division of Solid Waste Services
10803 Ironton Cutoff
Little Rock, AR 72206

Prepared by

FTN Associates, Ltd.
3 Innwood Circle, Suite 220
Little Rock, AR 72211

FTN No. R04010-2287-001

April 29, 2020

CERTIFICATION

In view of the requirements for compost reporting, I have inspected the compost site at the Little Rock Solid Waste Facility. To the best of my knowledge, the compost facility generally complies with permit conditions and Regulation No. 22, including the following:

1. Compliance with the operating requirements of Regulation No. 22 and permit conditions;
2. No changes to the operating plan have been made that are not identified in this report;
3. Stormwater controls have been maintained; and
4. No other items were observed that may impact permit compliance at the compost facility.



Jason J Ghidotti, PE, Arkansas License #10031
Project Manager
FTN Associates, Ltd.

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1.0 INTRODUCTION

The City of Little Rock (CLR) owns and operates a municipal solid waste management facility at 10803 Ironton Cutoff Road in Pulaski County, Arkansas. Facilities at this complex include a Class 1 landfill, Class 4 landfill, and yard waste composting site, all permitted on April 27, 1993, by the Arkansas Department of Environmental Quality (ADEQ) under Permit No. 0266-S. The complex also includes an administration building, shop building, records storage building, scale house, solid waste collection section building, vehicle wash site, fuel station, leachate pretreatment system, and a cart maintenance facility. The solid waste management facility is operated by the Solid Waste Services Division of the CLR Department of Public Works. On October 17, 2008, a separate permit for the yard waste compost facility, Permit No. 0031-SCYW, was issued to CLR. The permit was renewed for an additional 5-year period in October 2017.

ADEQ policy requires that all permitted compost facilities prepare an annual report that addresses the quantity of compost produced. This report documents findings of a site inspection by the Engineer on April 3, 2020 and compliance with annual reporting requirements. Appendix A presents correspondence with ADEQ during the year. Appendix B shows photos from the inspection.



2.0 OPERATIONS SUMMARY

The yard waste composting facility was operated by American Composting, Inc. (ACI), through the first quarter of 2001. On March 28, 2001, CLR decided not to renew its contract with ACI, and CLR has operated the facility since then. ACI removed all of the final product stored at the site in July 2001.

The composting facility is a 20-acre, asphalt-paved site where yard waste is aerobically composted using the windrow composting method. The service area is the city of Little Rock. Incoming yard waste is weighed at the scale house and the source and tonnage recorded in electronic and paper records. The composting process consists of a four-step process as described in the sections below.

2.1 Preliminary Processing

Incoming yard waste is unloaded at a designated receiving area. Unacceptable items or oversized items such as large tree trunks are sorted out and disposed at the landfill. The remaining yard waste is then processed by grinding for size reduction.



2.2 Active Composting

The active compost process begins by constructing windrows of ground yard waste with front-end loaders. As the compost process progresses, windrows are periodically turned using a windrow turning machine or front-end loaders. Water is added as needed and pile temperature is monitored during the process.

The yard compost site utilizes the windrow method of composting. This facility also produces mulch.

2.3 Curing

As the active composting process progresses, windrows are gradually combined until finally, a large curing pile is constructed for final compost curing. The curing process allows time for the compost process to progress to maturity.



Finished compost (foreground) and mulch (background).

2.4 Final Screening

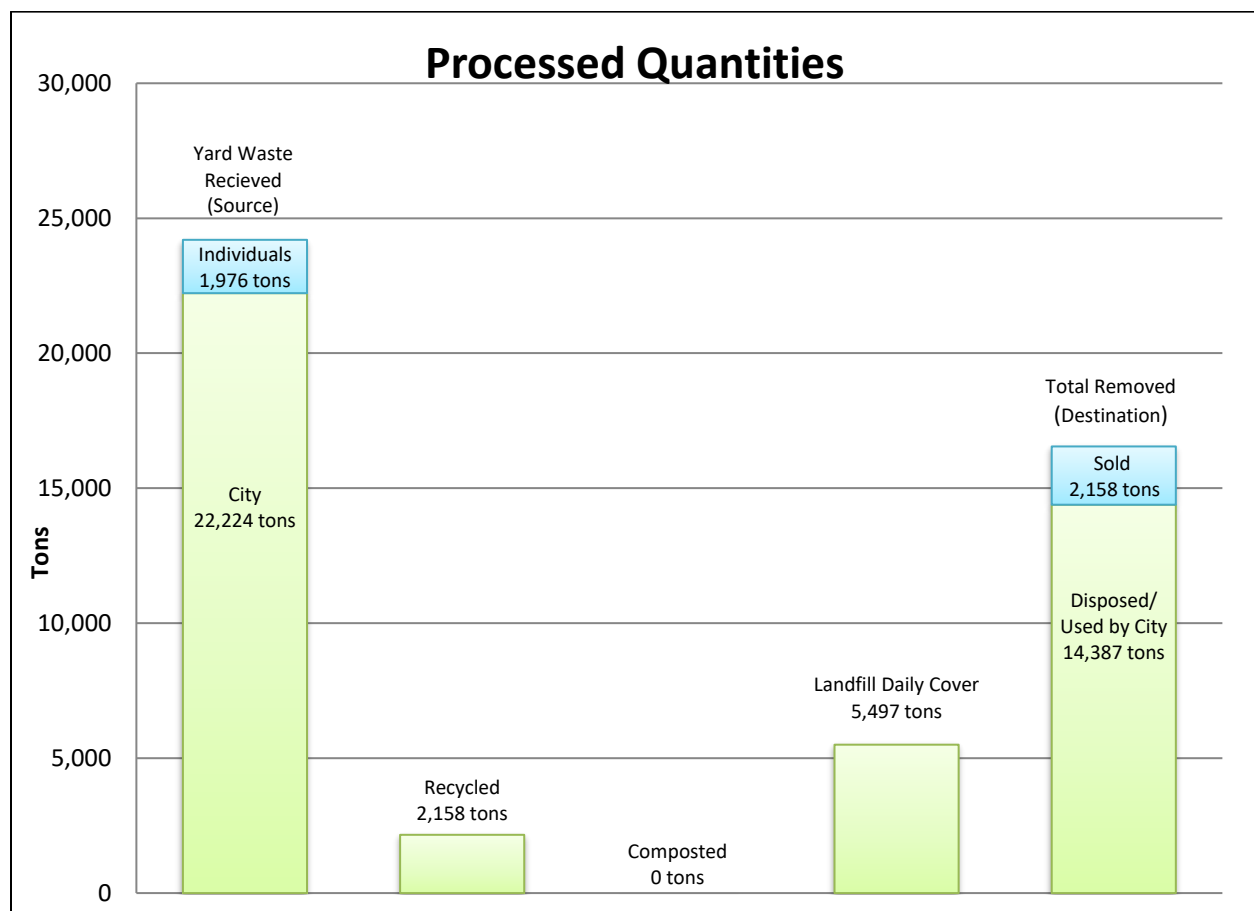
After the curing process is complete, the compost is screened to reduce particle size and screen out plastic bag remnants and oversized materials. Final screening produces a uniform, high-quality material suitable for use as a soil amendment. Screen rejects are disposed of in the Class 1 landfill.



Ground hard and soft wood.

3.0 PROCESSED QUANTITIES

In addition to compost, this facility produces mulch (ground hard and soft wood). The scale house tracks the total tons of finished products (compost and mulch) removed from the site, the inert reject material that is sorted out and disposed of in the Class 1 landfill, and the yard and tree waste received at the facility. In addition, CLR tracks the tons of ground yard waste utilized as alternate daily cover (ADC) at the Class 1 landfill. The graph below shows the tonnage handled for the 2019 calendar year. The facility received 24,200 tons of yard waste during 2019. Of that, 16,545 tons of finished product was removed from the facility; 5,497 tons were used as mulch for daily cover on the Class 1 landfill; and 2,158 tons was recycled (see Appendix C). Only 2,158 tons of finished material were sold during 2019.



4.0 COMPLIANCE WITH OPERATING REQUIREMENTS

Based on quarterly inspections by ADEQ, the yard waste compost site is in compliance with the operating requirements of Regulation No. 22 and permit conditions. However, ongoing maintenance and site improvements are needed to keep the facility in compliance with environmental regulations. Correspondence with ADEQ is included in Appendix A.

4.1 Blowing Litter

Yard waste including leaves, grass, and shrubbery prunings are typically collected in plastic bags. During the composting process, some blowing litter problems are generated due to the grinding of the above plastic bags. To address blowing litter problems, CLR installed a perimeter fence in January 2002. Removal of ground plastic trapped by the perimeter fence is carried out regularly at the facility. The perimeter fence and facility was clean at the time of inspection.

4.2 Site Inventory

Site inventory is the comparison between the amount of incoming material (yard and tree waste) and the amount of material leaving the composting site, which is composed of finished products (compost and mulch), compost rejects, and ground yard waste utilized as alternate daily cover material at the Class 1 landfill. The facility had several piles of unprocessed waste, ground waste and compost. The materials were well-segregated. Processed material was being hauled to the Class 1 landfill for use as Alternative Daily Cover during the inspection.

4.3 Pond Maintenance

City crews perform ongoing maintenance activities on the compost runoff pond such as mowing of the cover vegetation of the pond's banks. The pond and perimeter swales were in good condition at the time of the inspection. Minor amounts of litter were present in the east swale from traffic to the Class 1 and Class 4 landfills. The facility routinely collects and disposes of this litter.

5.0 PROPOSED CHANGES TO THE OPERATING PLAN

No changes in the current method of operations were required.

6.0 STORMWATER CONTROLS

Stormwater controls are in place and functioning. On October 25, 2006, ADEQ issued NPDES Stormwater Industrial General Permit No. ARR000220, and the most recent permit renewal was issued December 31, 2018. The NPDES permit allows the discharge of the CLR composting runoff pond into “waters of the United States.” On November 7, 2006, CLR began discharging the compost runoff pond into a ditch located just north of the pond. As a backup system, stormwater from the compost runoff pond can be diverted to the leachate pond or directly to the city’s sewer line.

7.0 CORRECTIVE ACTIONS

The inspections performed by ADEQ during the present reporting period resulted in two Category 2 violations. A routine inspection on March 5, 2019 resulted in a Category 2 violation regarding §22.806(a)(2) and §22.806(b)(3) of Regulation No. 22. (listed as “Adequate composting area surface, slope and drainage” on the inspection form). Standing water was observed on the compost pad. In response to this violation, the facility made repairs to the low area where the water was standing. A routine inspection on November 25, 2019 resulted in a Category 2 violation regarding §22.805 of Regulation 22 (listed as “Operations in accordance with permit documents” on the inspection form). The compost grinder had been non-functional for 6 months. During the April 03, 2020 site visit, the grinder was in use.

APPENDIX A

Permit Modifications and Department Correspondence



City of Little Rock

Department of
Public Works

10803 Ironton Cutoff
Little Rock, Arkansas 72206
Phone: (501) 888-4299
Fax: (501) 888-4589

Solid Waste Division

January 14, 2019

AFIN: 60-01071
PMT#: 0031-SCYW

JAN 16 2019

Kim Davenport, Inspector
Arkansas Department of Environmental Quality
Solid Waste Management Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

DOC ID#: 75320
TO: RH > FILE < KMB

Re: Quarterly Inspection, AFIN 60-01071, Permit 0031-SCYW

Dear Ms. Davenport:

In response to your inspection of November 29, 2018, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Compost Site:

Compost Site, Permit # 0031 – SCYW

- No violations on site at this time

Thank you for your cooperation in this matter. If I can be of any further assistance please contact me at your convenience.

Sincerely,

Warren Atkins
Solid Waste Services Manager



Department of
Public Works

10803 Ironton Cutoff
Little Rock, Arkansas 72206
888-4299
Fax 888-4589

April 23, 2019

AFIN: 60-01071
PMT#: 0031-SCYW

APR 30 2019

Kim Davenport, Inspector
Arkansas Department of Environmental Quality
Solid Waste Management Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

DOC ID#: 76183
TO: RH>FILE <KMB

Re: Quarterly Inspection, AFIN 60-01071, Permit 0031-SCYW

Dear Ms. Davenport:

In response to your inspection of March 5, 2019, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Compost Site:

Compost Site, Permit # 0031 – SCYW

- Standing water – We have made repairs to the low area where water was standing.

Thank you for your cooperation in this matter. If I can be of any further assistance please contact me at your convenience.

Sincerely,

Warren Atkins
Solid Waste Services Manager



July 5, 2019

AFIN: 60-01071
PMT#: 0031-SCYW

JUL 10 2019

Kim Davenport, Inspector
Arkansas Department of Environmental Quality
Solid Waste Management Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

DOC ID#: 716694
TO: RH > FILE 4KMB

Re: Quarterly Inspection, AFIN 60-01071, Permit 0031-SCYW

Dear Ms. Davenport:

In response to your inspection of June 18, 2019, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Compost Site:

Compost Site, Permit # 0031 – SCYW

- No violations on site at this time

Thank you for your cooperation in this matter. If I can be of any further assistance please contact me at your convenience.

Sincerely,

Warren Atkins
Solid Waste Services Manager



10803 Ironton Cutoff
Little Rock, Arkansas 72206
888-4299
Fax 888-4589

March 23, 2020

Kim Davenport, Inspector
Arkansas Department of Environmental Quality
Solid Waste Management Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

Rec'd Digitally

AFIN: 60-01071

PMT#: 0031-SCYW

RECEIVED
By Karen Blue at 1:57 pm, Apr 01, 2020

DOC ID#: 78086

TO: RH>FILE <KMB

S
W
M
D

Re: Quarterly Inspection, AFIN 60-01071, Permit 0031-SCYW

Dear Ms. Davenport:

In response to your inspection of November 25, 2019, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Compost Site:

Compost Site, Permit # 0031 – SCYW

- No violations on site at this time

Thank you for your cooperation in this matter. If I can be of any further assistance please contact me at your convenience.

Sincerely,


Nathan Charles
Solid Waste Services Engineer

APPENDIX B

Photographs from Inspection



Photo 1: Yard waste processing.



Photo 2: Yard waste as received.



Photo 3: Stormwater Pond North of Compost Facility.



Photo 4: Stockpiled mulch product.



Photo 5: Compost facility from top of Class 1 Landfill.

APPENDIX C

Monthly Yard Waste Quantities

2019
Recycled Yardwaste

Date	YW Received	YW Recycled	Compost Waste	Daily Cover Grinding	Total
January	1,891.22	170.89	0.00	1,546.15	174.18
February	1,311.17	159.23	0.00	994.16	157.78
March	1,695.65	429.24	0.00	268.77	997.64
April	2,252.85	447.87	0.00	708.05	1,096.93
May	2,114.32	229.98	0.00	687.82	1,196.52
June	2,024.30	138.74	0.00	164.73	1,720.83
July	2,141.69	139.68	0.00	323.68	1,678.33
August	1,665.16	122.93	0.00	262.99	1,279.24
September	1,727.10	140.78	0.00	17.34	1,568.98
October	1,792.34	100.77	0.00	37.57	1,654.00
November	2,297.55	30.80	0.00	17.34	2,249.41
December	3,286.38	47.09	0.00	468.18	2,771.11
Total	24,199.73	2,158.00	0.00	5,496.78	16,544.95