

Blue, Karen

To: Bennett, Richard
Subject: RE: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

From: Jason Ghidotti [<mailto:jig@ftn-assoc.com>]
Sent: Friday, June 5, 2020 12:21 PM
To: Bennett, Richard
Subject: RE: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

Richard,

I have attached newly revised sheets for the above referenced AEIR. I also received more clarification on the destinations of the compost from the City and changed some of the labels and text to reflect this.

Thank you again for the opportunity to correct this! Please let us know if you find anything else.

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
By Karen Blue at 3:16 pm, Jun 05, 2020

DOC ID#: 78360

TO: AC>FILE <KMB

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From: Bennett, Richard <BENNETT@adeq.state.ar.us>
Sent: Wednesday, June 3, 2020 3:50 PM
To: Jason Ghidotti <jig@ftn-assoc.com>
Subject: FW: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

I have yet to hear from you. Are you still working on it?

From: Bennett, Richard
Sent: Thursday, May 28, 2020 9:08 AM
To: 'Jason Ghidotti'
Subject: RE: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

I have not gotten a response? Just checking to make sure you did not send one and I failed to get it.

From: Jason Ghidotti [<mailto:jig@ftn-assoc.com>]
Sent: Thursday, May 21, 2020 3:03 PM
To: Bennett, Richard
Subject: Re: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

I did. I will get to it as soon as I can.

Jason

Jason Ghidotti, PE (AR)
FTN Associates, LTD
501-225-7779

From: Bennett, Richard <BENNETT@adeq.state.ar.us>
Sent: Thursday, May 21, 2020 2:59:13 PM
To: Jason Ghidotti <jig@ftn-assoc.com>
Subject: FW: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

[Did you not get this email?](#)

From: Bennett, Richard
Sent: Thursday, May 14, 2020 1:00 PM
To: 'Jason Ghidotti'
Subject: RE: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

The text on page 4 does to match the table on page 4. The table in Attachment C does seem to be revised yet its number are not reflected in the Table on page 4. Did you send me the correct files?

Also it seems that in Section 6 that Terracon did not submit any NPDES reports, was that because they are not required? I thought you said that NET DMR was used to submit DMRs, or was this for the NPDES permits not associated with the Compost Facility and the permit for the facility (ARR000220) does not require any reports to be submitted. I am asking so I can make sure the required reports are in our system.

Thanks!

From: Jason Ghidotti [<mailto:jig@ftn-assoc.com>]
Sent: Thursday, May 14, 2020 11:20 AM
To: Bennett, Richard
Cc: Charles, Nathan; Atkins, Warren; Kyle Templet
Subject: Revisions to CLR Compost Facility 2019 AEIR (60-01071/0031-SCYW)

Richard,

Thank you for contacting me regarding the requested changes to the above referenced AEIR. As we discussed, I have updated the information on the yard waste quantities (both chart and table) and stormwater controls. Revised pages are attached.

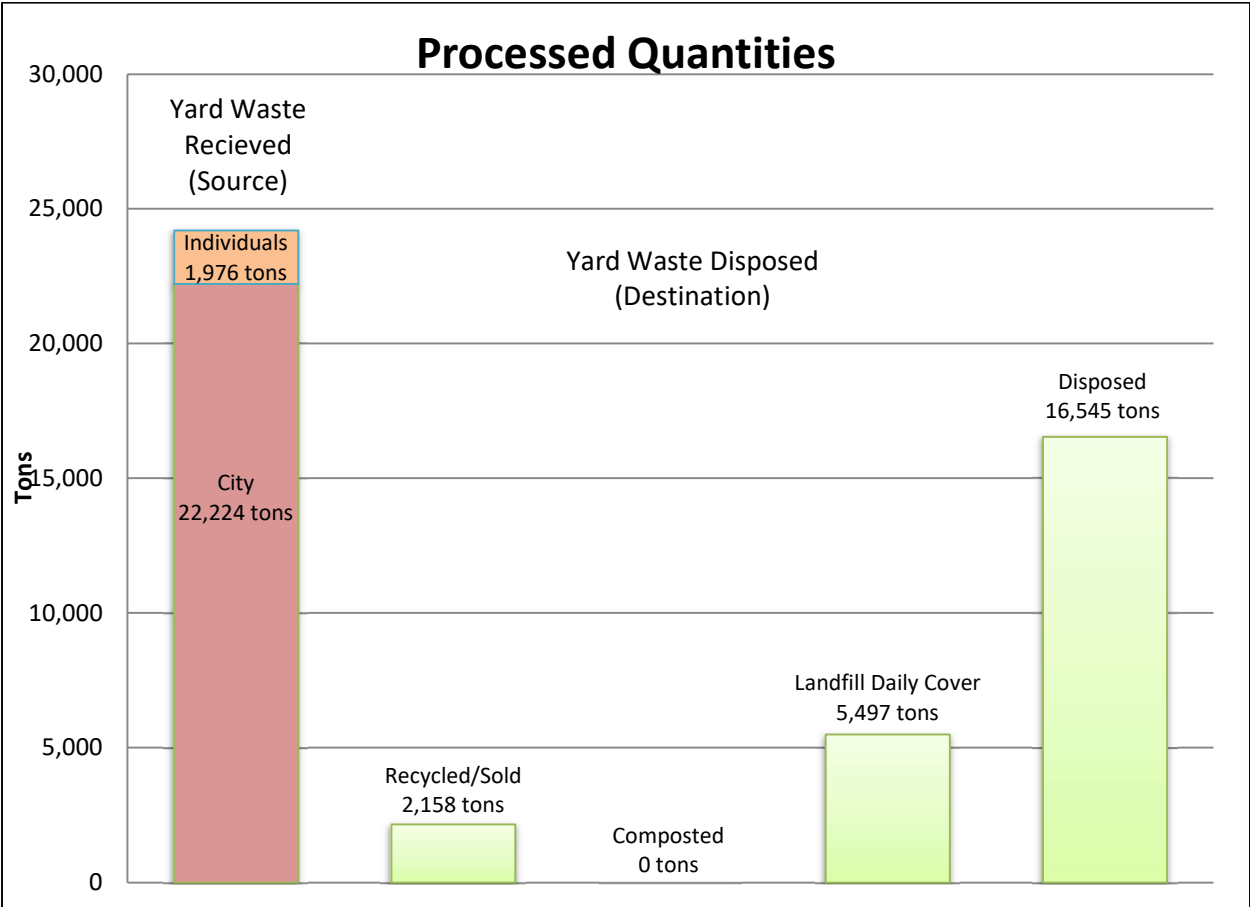
Let me know if you have any additional questions. I have copied the facility for their records.

Thanks,
Jason

Jason J Ghidotti, PE*
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Little Rock, Arkansas 72211
(501)225-7779
*Arkansas

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 product was disposed in the Class 1 landfill; 5,497 tons were used as alternative daily cover on the Class 1 landfill; and 2,158 tons were recycled or sold (see Appendix C).



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, DEQ issued NPDES Industrial Stormwater General Permit (IGP) No. ARR000220, and the most recent permit renewal was issued July 1, 2019. The IGP Stormwater Pollution Prevention Plan (SWPPP), facility inspections, discharge monitoring results and reports, including the Stormwater Annual Report (SWAR), are included in the facility operating record to be made available to DEQ upon request.

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.

2019
Recycled Yardwaste

Date	YW Received	Recycled/Sold	Composted	Daily Cover	Total Disposed
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