

Blue, Karen

From: Cusher, Annette
Sent: Monday, April 5, 2021 9:49 AM
To: Blue, Karen
Subject: FW: CLR Compost Facility 2020 AEIR (60-01071/0031-SCYW)
Attachments: 2020 LR Compost Facility AEIR 2021-03-31.pdf

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: Jason Ghidotti <jjg@ftn-assoc.com>
Date: 4/2/21 3:53 PM (GMT-06:00)
To: "Cusher, Annette" <Cusher@adeq.state.ar.us>
Cc: "Coker, Cristina" <Coker@adeq.state.ar.us>, "Bennett, Richard" <BENNETT@adeq.state.ar.us>, "Ragsdale, Casey" <Casey.Ragsdale@adeq.state.ar.us>, "Rich, Jay" <RICH@adeq.state.ar.us>, "Charles, Nathan" <ncharles@littlerock.gov>, Kyle Templet <kjt@ftn-assoc.com>
Subject: CLR Compost Facility 2020 AEIR (60-01071/0031-SCYW)

Annette,

Annual Engineering Inspection Report for the Little Rock Compost Facility is attached.

Please contact me if you have any questions.

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

From: Cusher, Annette <Cusher@adeq.state.ar.us>
Sent: Friday, April 2, 2021 2:42 PM
To: Nick Schoggin <nvs@ftn-assoc.com>; Paul Crawford <pwc@ftn-assoc.com>; Jason Ghidotti <jjg@ftn-assoc.com>
Cc: Coker, Cristina <Coker@adeq.state.ar.us>; Bennett, Richard <BENNETT@adeq.state.ar.us>; Ragsdale, Casey <Casey.Ragsdale@adeq.state.ar.us>; Rich, Jay <RICH@adeq.state.ar.us>
Subject: 2020 AEIRs

Gentlemen,

Rec'd Digitally	
AFIN: 60-01071	
PMT#: 0031-SCYW	
RECEIVED <small>By Karen Blue at 5:58 pm, Apr 07, 2021</small>	S
DOC ID#: 79866	W
TO: AC>FILE <KMB	M
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The ADEQ email server has been down since March 26th, some AEIR's made it through. I have Legacy, but don't have the others you all typically submit. If you have submitted the City of Little Rock, Mississippi County and Morrilton, they did not come through. Please let me know if i can be of further assistance.

thanks,
Annette



water resources / environmental consultants

**2020 ANNUAL REPORT
CITY OF LITTLE ROCK
YARD WASTE COMPOST FACILITY
PERMIT NO. 0031-SCYW, AFIN: 60-01071**

MARCH 31, 2021

2020 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. R04010-2506-001

March 31, 2021

CERTIFICATION

In view of the requirements for compost reporting, I have inspected the compost site at the City of 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 Energy and Environment's Division of Environmental Quality (DEQ) 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.

DEQ 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 March 19, 2021 and compliance with annual reporting requirements. Appendix A presents correspondence with DEQ 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

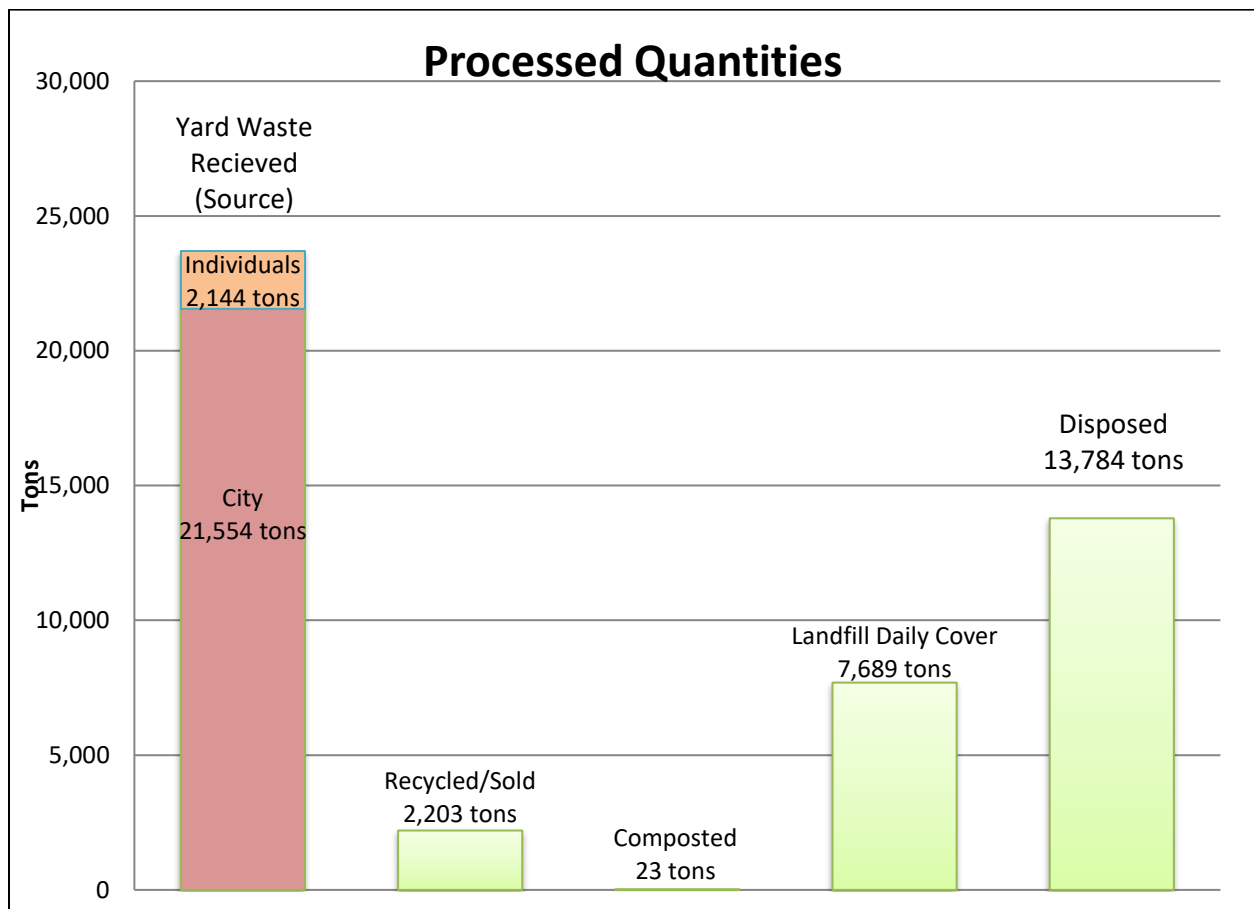
After the curing process is complete, the compost is screened to reduce particle size and screen out plastic bag remnants and oversized materials. Final screening produces a uniform, high-quality material suitable for use as a soil amendment. Screen rejects are disposed of in the Class 1 landfill.



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 2020 calendar year. The facility received 23,699 tons of yard waste during 2020. Of that, 13,784 tons of product was disposed in the Class 1 landfill; 7,689 tons were used as alternative daily cover on the Class 1 landfill; 23 tons were composted and 2,203 tons were recycled or sold (see Appendix C).



4.0 COMPLIANCE WITH OPERATING REQUIREMENTS

Based on quarterly inspections by DEQ, 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 DEQ 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 (ADC) 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, DEQ issued NPDES Industrial Stormwater General Permit (IGP) No. ARR000220, and the most recent permit renewal was issued January 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 quarterly yard waste compost facility inspections performed by DEQ during the reporting period resulted zero violations.

APPENDIX A

Permit Modifications and Department Correspondence

April 17, 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 3:50 pm, Apr 21, 2020

DOC ID#: 78186

TO: RH>FILE <KMB

**S
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D**

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

Dear Ms. Davenport:

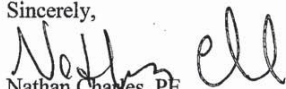
In response to your inspection of March 10, 2020, the following is a list of comments and corrective actions to be undertaken on the City of Little Rock's Compost Site:

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, PE
Solid Waste Engineer

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

June 30, 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 <small>By Karen Blue at 2:35 pm, Jul 07, 2020</small>	S
DOC ID#: 78543	W
TO: RH>FILE <KMB	M
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Re: Quarterly Inspection, AFIN 60-01071, Permit 0031-SCYW

Dear Ms. Davenport:

In response to your inspection of June 11, 2020, 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, PE
Solid Waste Engineer

October 28, 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 <small>By Karen Blue at 10:23 am, Nov 06, 2020</small>	S
DOC ID#: 79170	W
TO: RH>FILE <KMB	M
	D

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

Dear Ms. Davenport:

In response to your inspection of September 15, 2020, 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, PE
Solid Waste Engineer



January 27, 2021

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	
<small>RECEIVED By Karen Blue at 3:15 pm, Feb 02, 2021</small>	S W M D
DOC ID#: 79569	
TO: RH>FILE <KMB	

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

Dear Ms. Davenport:


In response to your inspection of December 15, 2020, 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, PE
Solid Waste 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 Cell 5 East Landfill.

APPENDIX C

Monthly Yard Waste Quantities

CLR Compost Facility					
2020 Monthly Yard Waste Quantities					
Month	Received (TONS)	Recycled/Sold (TONS)	Composted (TONS)	Alternative Daily Cover (TONS)	Disposed (TONS)
January	1,706.66	143.61	0.00	1,020.17	542.88
February	1,190.39	183.03	0.00	930.58	76.78
March	1,902.98	406.32	0.00	147.39	1,349.27
April	1,925.40	492.28	0.00	736.95	696.17
May	2,352.17	355.51	10.36	771.63	1,214.67
June	1,784.81	153.09	12.20	945.03	674.49
July	1,700.99	79.22	0.00	49.13	1,572.64
August	1,248.90	87.39	0.00	387.26	774.25
September	1,180.88	59.63	0.00	82.70	1,038.55
October	1,814.59	131.86	0.00	739.84	942.89
November	3,812.26	74.11	0.00	676.26	3,061.89
December	3,078.67	36.75	0.00	1,202.24	1,839.68
Total	23,698.70	2,202.80	22.56	7,689.18	13,784.16