

Blue, Karen

From: Cusher, Annette
Sent: Monday, April 18, 2022 3:47 PM
To: OLRAAdmin
Subject: FW: Little Rock Compost Facility 2021 AEIR (AFIN 60-01071, Permit 0031-SCYW)
Attachments: 2021 LR Compost Facility AEIR Report 2022-04-15.pdf

From: Jason Ghidotti [mailto:jjg@ftn-assoc.com]
Sent: Monday, April 18, 2022 2:50 PM
To: Cusher, Annette; Weidman, Max; Richard Gray (richard.gray@nrg.com)
Cc: Charles, Nathan; Kyle Templet
Subject: Little Rock Compost Facility 2021 AEIR (AFIN 60-01071, Permit 0031-SCYW)

Please find attached the 2021 AIER for the City of Little Rock Yard Waste Compost Facility. Contact me or Kyle Templet, EI, (copied) if you have any questions.

I apologize that it was not submitted on Friday. It was complete, but I was out of the State and unable to send it.

Thanks,
Jason

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

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AFIN: 60-01071	
PMT#: 0031-SCYW	
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water resources / environmental consultants

**2021 ANNUAL REPORT
CITY OF LITTLE ROCK
YARD WASTE COMPOST FACILITY
PERMIT NO. 0031-SCYW, AFIN: 60-01071**

APRIL 15, 2021

2021 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. R04010-2808-001

April 15, 2022

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 25, 2022 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

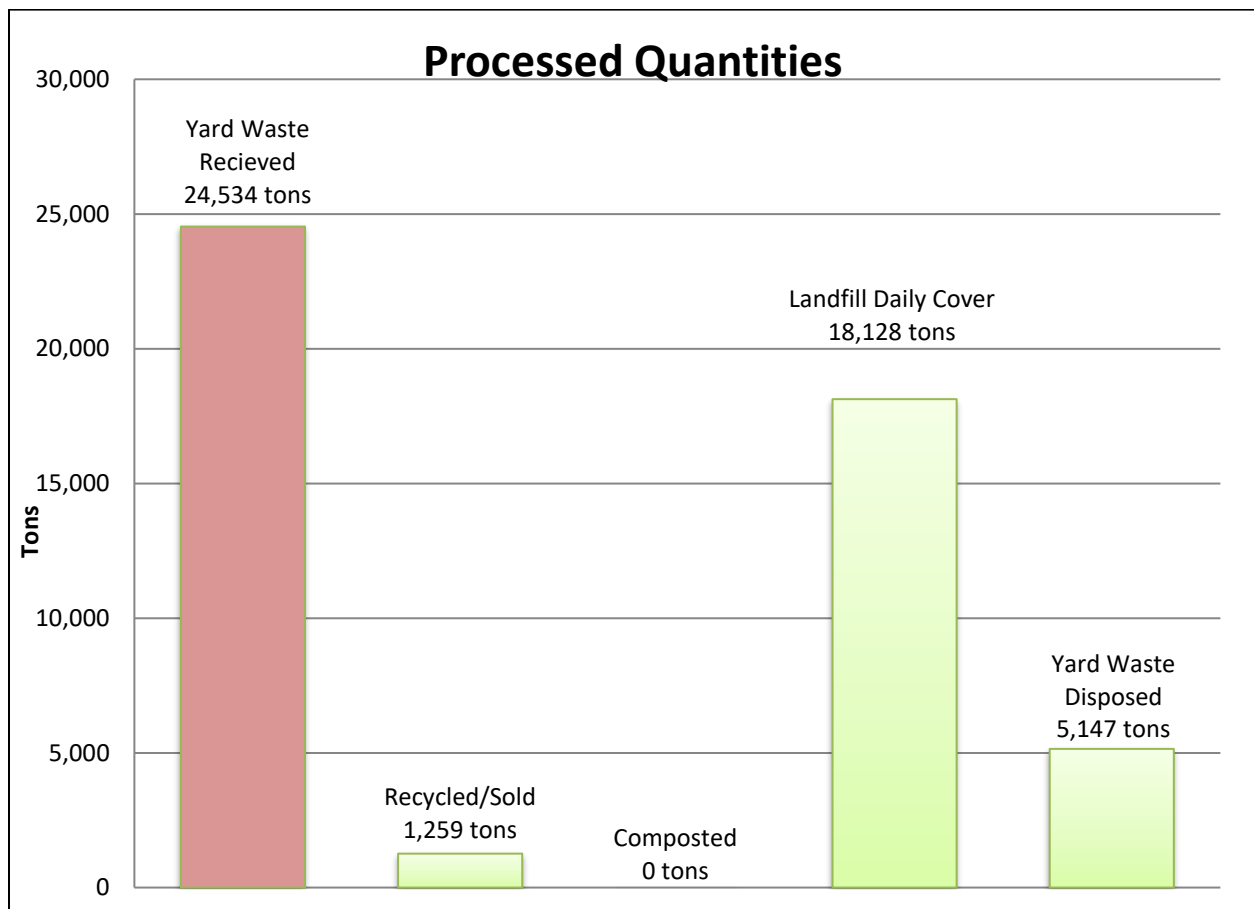
After the curing process is complete, the compost is screened to reduce particle size and screen out plastic bag remnants and oversized materials. Final screening produces a uniform, high-quality material suitable for use as a soil amendment. Screen rejects are disposed of in the Class 1 landfill.



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 2021 calendar year. The facility received 24,534 tons of yard waste during 2021. Of that, 5,147 tons of product was disposed in the Class 1 landfill; 18,128 tons were used as alternative daily cover on the Class 1 landfill; 0 tons were composted; and 1,259 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



ARKANSAS

ENERGY & ENVIRONMENT

3/22/2021

Mr. Nathan Charles
Solid Waste Service Manager
10803 Ironton Cutoff Road
City of Little Rock Disposal Facility
Little Rock, AR 72206

RE: Quarterly Inspection conducted on March 11, 2021
AFIN 60-01071
Permit Number 0031-SCYW

Dear Mr. Nathan Charles,

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. At the time of the inspection, no allegations of noncompliance were observed at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at (501) 682-0586 or davenportk@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kim Davenport'.

Kim Davenport
Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317



ARKANSAS

ENERGY & ENVIRONMENT

6/22/2021

Mr. Nathan Charles
Solid Waste Service Manager
10803 Ironton Cutoff Road
City of Little Rock Disposal Facility
Little Rock, AR 72206

RE: Quarterly Inspection conducted on June 7, 2021
AFIN 60-01071
Permit Number 0031-SCYW

Dear Mr. Nathan Charles,

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. At the time of the inspection, no allegations of noncompliance were observed at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at (501) 682-0586 or davenportk@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kim Davenport'.

Kim Davenport
Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Nicholas Jones P.E., Senior Manager, Office of Land Resources



ARKANSAS

ENERGY & ENVIRONMENT

9/13/2021

Mr. Nathan Charles
Solid Waste Service Manager
10803 Ironton Cutoff Road
City of Little Rock Disposal Facility
Little Rock, AR 72206

RE: Quarterly Inspection conducted on August 27, 2021
AFIN 60-01071
Permit Number 0031-SCYW

Dear Mr. Nathan Charles,

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. At the time of the inspection, no allegations of noncompliance were observed at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at (501) 682-0586 or davenportk@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. H. ...'.

Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Scott McWilliams, Senior Compliance Manager, Regulated Waste Operations



ARKANSAS

ENERGY & ENVIRONMENT

12/6/2021

Mr. Nathan Charles
Solid Waste Service Manager
10803 Ironton Cutoff Road
City of Little Rock Disposal Facility
Little Rock, AR 72206

RE: Inspection conducted on November 17, 2021
AFIN 60-01071
Permit Number 0031-SCYW

Dear Mr. Nathan Charles,

The Arkansas Division of Environmental Quality Office of Land Resources (DEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. At the time of the inspection, no allegations of noncompliance were observed at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at (501) 682-0586 or davenportk@adeq.state.ar.us

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kim Davenport'.

Kim Davenport
Solid Waste Inspector
5301 Northshore Drive, North Little Rock, AR 72118-5317

Enclosure

cc: Scott McWilliams, Senior Compliance Manager, Regulated Waste Operations

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: Curing mulch product.



Photo 6: Compost facility from top of Class 1 Cell 5 East Landfill.

APPENDIX C

Monthly Yard Waste Quantities

2021
Monthly Yardwaste Quantities

Date	YW Received	YW Recycled	Compost Waste	Daily Cover Grinding	Total
January	1,784.88	100.24	0.00	3280	-1,595.36
February	720.22	53.37	0.00	1456	-789.15
March	2,480.73	261.07	0.00	1216	1,003.66
April	2,503.71	171.56	0.00	472	1,860.15
May	2,192.06	155.02	0.00	1672	365.04
June	2,095.71	121.51	0.00	1512	462.20
July	1,612.71	91.87	0.00	896	624.84
August	1,808.31	87.75	0.00	752	968.56
September	1,628.30	97.57	0.00	144	1,386.73
October	1,707.23	59.20	0.00	1128	520.03
November	2,242.08	26.57	0.00	1144	1,071.51
December	3,757.68	32.99	0.00	4456	-731.31
Total	24,533.62	1,258.72	0.00	18,128	5,146.90