October 21, 2025

Allen Gibson, Maintenance Director, Tucker Unit (allen.gibson@doc.arkansas.gov)
Arkansas Department of Corrections
6814 Princeton Pike, Pine Bluff, AR 71602

RE: Second Notice of Deficiency for Permit Application
Tucker Compost Facility
Permit Tracking Number: 0318-SC; AFIN: 35-00112
Cross Reference Identifier(s): 80202, 80881, 82843

Dear Mr. Gibson,

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the Permit Application submitted on May 19, 2021, and the Revised Permit Application received October 12, 2022, for the Tucker Compost Facility. After review, the deficiencies listed below were identified.

1. Please provide the legal description and proof of ownership/deed of the site as required by 8 CAR § 60-303(c)(2)(C).
2. The maps provided indicate the facility is either in the floodplain, or very near to it. Please provide an explanation of how the facility will mitigate the risk of washout of solid waste. Any release of solid waste may pose a hazard to human health, wildlife, or land or water resources (8 CAR 60-803(a)(2)).
3. Information demonstrating that the facility is not located within wetlands must be provided to DEQ (8 CAR 60-803(a)(3)). A statement by the Department of the Army, U.S. Army Corps of Engineers, must be provided showing that the facility is not located within any wetlands or jurisdictional waters. The wetland delineation map provided (Sheet Number 8 of Document Identifier **82843** is not explained and no sources are given.
4. All type "O" facilities must submit a geotechnical report that describes site conditions to a depth of at least ten feet below existing ground surface as determined from existing data or supplemented by on-site investigations. DEQ could not locate these geotechnical reports. Please submit a report which includes the following categories: (i) Soil type, (ii) Bedrock characteristics, and (iii) Seasonal high water table.
5. The revised Operating Narrative must address methods to maintain biological conditions, and to minimize, manage, and monitor odors including how leachate will be collected or mitigated at the compost facility (8 CAR 60-804(b)(8)(B)(viii)).
6. Please submit a flow diagram of the proposed processing steps including an estimated mass balance of material received, residuals generated, recyclable items recovered and finished compost produced (8 CAR 60-806(b)(1)).
7. Please indicate in the revised Operating Plan the source of the waste to be composted (8 CAR § 60-804), and the end use of the compost material (8 CAR § 60-804(b)(8)(B)(xi). Composted materials must meet the requirements of 8 CAR § 60-801.
8. The floor of the facility must have a subbase of compacted clay, treated soil, or other impermeable material with a permeability of 1 x 10^{-7} cm/sec or less (8 CAR 60-806(b)(3)). Please provide documentation that confirms the facility floor was built in accordance to the stated rule.

9. As required by 8 CAR 60-807(a), the facility may not commence construction or operation without required stormwater or discharge permits or documentation that these permit(s) are not required. Please provide documentation that either the required stormwater or discharge permits are held by the facility or that they are not required.
10. Section 2 of the operating plan of the original Notice of Intent (NOI) (Doc ID **80202**) indicates that a temperature of 131°F will be maintained for 3 continuous days. This was later omitted in the revised NOI (Doc ID **82843**). Section 3 of operating plan in the revised NOI indicates that compost will only be sampled and tested annually. Please explain how compost quality control will be maintained with only annual testing or revise the sampling plan to include at minimum weekly temperature sampling.
11. The operating plans for the Tucker Unit and Tucker Max Unit Compost facilities were identical prior to the first revision. Please explain why the curing process portion of the operating plan was omitted in only one of the revised NOI's. It is absent from Doc ID **82843**, but retained in Doc ID **82844** (final paragraph of page 44).

Please address the deficiencies identified above and submit an updated permit application to DEQ within thirty (30) calendar days from the receipt of this letter. Should you have any questions or concerns, please feel free to contact me at (501) 682-0706 or email at david.isaacs@arkansas.gov.

Sincerely,



David Isaacs
Engineer, Division of Environmental Quality

cc: DEQ - Banic, Hurt, Krou
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