



**The City of**  
**OKLAHOMA CITY**  
**PARKS AND RECREATION DEPARTMENT**

March 22, 2021

Enso Solutions, LLC  
c/o Matt Golladay, President  
2701 Haindl Drive  
Oklahoma City, OK 73129

RE: Request for Written Statement—Application to Reclassify to a Class III Composting Facility

Dear Mr. Golladay:

On November 24, 2020, staff received the attached request. Currently, Enso Solutions, LLC, (Enso) operates a Class I Composting Facility (Facility) at 2701 Haindl Drive. The Facility composts certain types of cannabis waste under a license from the Oklahoma Medical Marijuana Authority.

The Facility is located within one-half mile of Top O' Town Park, 2102 South Everest Avenue; and Schilling Park, 601 Southeast 25<sup>th</sup> Street. Therefore, approval of Enso's Class I Facility designation required a written statement from the Oklahoma City Parks and Recreation Department (OKC Parks) that Enso's activities were not expected to adversely affect either park. On February 25, 2020, following a recommendation by the Oklahoma City Park Commission, staff issued the written statement.

Now, Enso wishes to reclassify from a Level I to a Level III Composting Facility. The Level III designation would allow Enso to process additional feedstocks. These include, but are not limited to, edible cannabis products and cannabis oils. Also, as a Level III Composting Facility, Enso could process additional tons of cannabis residuals each year.

Because of the Facility's proximity to Top O' Town Park and Schilling Park, Enso again requires a written statement from OKC Parks. Staff evaluated Enso's proposal and determined that it would not negatively impact either park. On March 17, 2021, the Oklahoma City Park Commission recommended that Enso be allowed to proceed with its planned Facility reclassification.

If you need additional information, please contact me at (405) 297-3882, or at [douglas.kupper@okc.gov](mailto:douglas.kupper@okc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas R. Kupper".

Douglas R. Kupper, CPRP, Director  
Parks and Recreation Department

Attachment



November 24, 2020

Doug Kupper  
Director  
Oklahoma City Parks & Recreation  
420 W. Main St, Suite 210  
Oklahoma City, OK 73102

**RE: Public Recreation or Natural Preservation Area Statement  
Enso Solutions, LLC - Class III Compost Facility  
Oklahoma County, Oklahoma**

Dear Mr. Kupper:

Enso Solutions, LLC (Enso) is in the process of preparing a permit application for a modification of a Class I Compost Facility to a Class III Compost Facility. The current facility location is: *All of Lots 1, 2, 3 & 4 in Block 3 of Akin Addition, Oklahoma City, Oklahoma, according to the recorded plat thereof, located within Section 11, Township 11 North, Range 3 West in Oklahoma County.* The street address is: *2701 Haindl Dr, Oklahoma City, OK 73129.* For your reference, a General Site Map with a one-half mile radius around the compost facility is provided as Exhibit A.

The purpose of this letter is to confirm compliance with the Oklahoma Department of Environmental Quality (DEQ) compost facility location restrictions as set forth in OAC 252:515-5-31. OAC 252:515-5-31(b) states:

- (1) Except as provided in (2) of this Subsection, no area within the permit boundary of a new solid waste disposal facility, or expansion of the permit boundary of an existing solid waste disposal facility, shall be located within one-half mile of any area dedicated and managed for public recreation or natural preservation by a federal, state or local government agency.
- (2) This restriction may be waived if the appropriate management agency provides a statement that the proposed facility is not expected to adversely affect the existing recreation or natural preservation area. Such statement shall be submitted to the DEQ.

It appears there are two parks, the Top O' the Town Park and the H.C. Schilling Park, located within one-half mile of the proposed facility location. Therefore, pursuant to Subsection (2) above, Enso is requesting your office provide a written statement that the modification from a Class I Compost Facility to a Class III Compost Facility is not expected to adversely affect the said parks.

Enso currently operates a cannabis composting site at the facility location as a Class I Compost Facility and under a License from OMMA (Oklahoma Medical Marijuana Authority). The Class I designation allows Enso to receive Type 1 feedstock, which includes cannabis trimmings, biomass (non-food plant matter), and cannabis crop residuals such as stalks, stems, and leaves. Class I facilities receive less than one hundred (100) tons, or two hundred (2) cubic yards, of material per year.

Enso seeks to modify its current permit to a Class III Compost Facility. The Class III designation allows Enso to receive Type 2 and Type 3 feedstock, in addition to the Type 1 feedstock already received. Type 2 and Type 3 feedstock include food waste, including but not limited to edible cannabis products and oils. Class III

facilities receive greater than or equal to one hundred (100) tons, or two hundred (2) cubic yards, of Type 1 and Type 2 feedstock per year. A copy of the feedstock types and composting facility classes, as defined in OAC 252:515-43, are provided as Exhibit B.

Type 1, Type 2 and Type 3 feedstock received will be composted (processing method) using an Intermodal Earth Flow composting system (in-vessel method), all within 48 hours of receipt. The Earth Flow composting vessel is situated inside of a fully enclosed warehouse at the current facility location. The thermophilic composting process takes 14-20 days depending on the temperature control and volume. The composting vessel is kept on an all-weather pad and inside of the processing area to prevent water on the processing floor. Also, any water produced from the system is contained/placed back on the compost pile inside of the vessel. The in-vessel method was chosen to primarily allow for the management and maintenance of the facility along with the odor minimization. At the same time, the vessel allows for ease of vermin, temperature, moisture, humidity, and air-borne emissions control. The composting process will take an estimated 14-20 days and at that time, the compost will be bagged for distribution, stored, or properly disposed of at a landfill. No compost will be stored on site for longer than 12 months. Furthermore, the approval from the DEQ to modify to a Class III permit will not include construction to the site or any material modification to the current processes at the existing site. The life expectancy of this facility is 20 years.

Enso does not believe the modification from a Class I Compost Facility to a Class III Compost Facility will adversely affect the said parks, and is requesting a written statement be provided from your office stating the same.

If you have any questions regarding this request, please do not hesitate to contact me by phone at (405) 512-3376 or by email at [nick@ensosolutionsllc.com](mailto:nick@ensosolutionsllc.com). Thank you very much for your assistance with this matter.

Respectfully,  
**Enso Solutions, LLC**

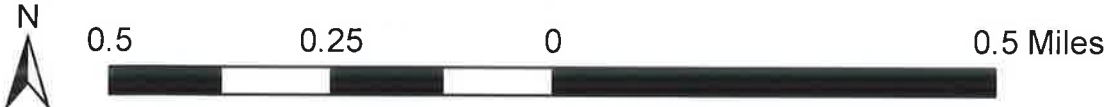


Nick Mesigh  
Vice President – Business Development

Attachments: Exhibit A  
Exhibit B



# EXHIBIT A



## EXHIBIT B

### **252:515-43-3. Feedstock types for composting facilities**

Feedstock material is divided into the following four (4) types based on increasing level of potential risk to human health and the environment from physical contaminants and human pathogens:

- (1) **Type 1.** Composed of yard trimmings, wood chips, woody materials, crop residues, hay, cotton-gin waste, additives, biofilters, and other materials approved by DEQ.
- (2) **Type 2.** Composed of source-separated organics, shredded paper, cardboard, computer paper, white paper, newspapers, napkins, other paper products and bulking agents, and other materials approved by DEQ.
- (3) **Type 3.** Composed of biosolids, food processing residuals, cooking oils, fats and greases, and other materials approved by DEQ.
- (4) **Type 4.** Composed of mixed (non-source separated) organics, commercial waste, and other materials approved by DEQ.

### **252:515-43-4. Composting facility classes**

- (a) **Class I.** Facilities that compost Type 1 feedstock, including yard waste composting facilities.
- (b) **Class II.** Facilities that compost Type 2 feedstock and may include Type 1 feedstock. These facilities receive less than one hundred (100) tons, or two hundred (200) cubic yards, of material per year.
- (c) **Class III.** Facilities that compost Type 3 feedstock and facilities that receive greater than or equal to one hundred (100) tons, or two hundred (200) cubic yards, of Type 1 and Type 2 feedstock per year.
- (d) **Class IV.** Facilities that compost Type 4 feedstock and may include Type 1, Type 2 and Type 3 feedstock.
- (e) **Special events composting.** A composting facility may be approved to compost a variety of feedstock types from special community collection events for a limited period of time under an approved plan or permit.