

SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

January 12, 2021

Matt Golladay  
Enso Solutions, LLC  
2701 Haindl Drive  
Oklahoma City, OK 73129

Re: Tier III Modification Application Administrative Review  
Enso Solutions Composting Facility, Permit #3555065  
Oklahoma County

**NOTICE OF DEFICIENCY**

Dear Mr. Golladay:

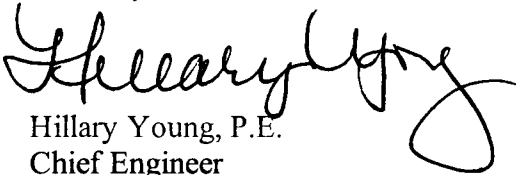
The Department of Environmental Quality (DEQ) is in receipt of the Tier III Modification Application (Modification) for Enso Solutions Composting Facility (Enso Solutions), dated November 11, 2020. The notice of filing was published in *The Oklahoman* on November 25, 2020; no requests for a process meeting were made. DEQ received the affidavit of publication on November 30, 2020. The purpose of the modification is to allow Enso Solutions to accept a new feedstock type and increase the volume of feedstock at the facility. DEQ has reviewed the response and identified the following deficiencies:

1. In accordance with Oklahoma Administrative Code (OAC) 252:515-5-31, the facility shall not be located within one-half mile of any formally dedicated public recreation area. OAC 252:515-5-31(b)(2) allows this restriction to be waived if the appropriate agency provides a written statement that the facility will not adversely affect the existing recreation area. DEQ understands that Enso Solutions has a public meeting with Oklahoma City Parks and Recreation on January 20, 2021 to obtain a letter that the facility will not adversely impact Schilling Park.
2. Please include what new feedstock types according to OAC 252:515-43-3 and source are intended to be added in the Modification, e.g. marijuana based food waste, a Type 2 feedstock, from dispensaries.
3. Please rephrase verbiage throughout the modification such as in item 8 "Enso Solutions LLC is applying for a permit to receive, process, and compost type 1, 2, and 3 feedstock" to clarify that Enso Solutions is a permitted Class I composting facility applying for a permit modification to accept food waste and greater than 100 tons per year of feedstock, and therefore according to OAC 252:515-43-4(c) Enso Solutions will change from a Class I to a Class III facility.
4. Items 69, 72, and 73 of the checklist refer to seeking a variance regarding contact and stormwater requirements. DEQ determined that a variance may not be necessary, if all processing occurs in the building. Please discuss how the design of the facility will minimize the potential for infiltration of contact water and stormwater.

5. In reference to requesting a variance from the groundwater monitoring requirement of OAC 252:515-43-91, please include more information in items 74-79 that explains how the specific composting processes at the facility will be equally as protective to the environment if groundwater monitoring is not conducted.
6. Please discuss any operational and design changes in the current process that may need to be made to adapt to the increase in volume and new feedstock type.
7. Section 10.c. of the Operational Plan, Composting Procedures, refers to the use of accelerants to expedite the composting process. Please describe what may be used as an accelerant.

Please update the application with the required information within 60 days of receipt of this letter. Please note that a technical review of the application has not yet begun, and additional deficiencies within the application may be identified. Should you have any questions, please contact Kaylee Shiplet of my staff at (405) 702-5196 or [Kaylee.shiplet@deq.ok.gov](mailto:Kaylee.shiplet@deq.ok.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Hillary Young". The signature is fluid and cursive, with a large loop at the end of the last name.

Hillary Young, P.E.  
Chief Engineer  
Land Protection Division

HY/ks

LAND PROTECTION DIVISION  
CONTROL SHEET

Subject: ENSO Solutions Program Code \_\_\_\_\_

Type of Letter: \_\_\_\_\_

Date Draft Submitted: \_\_\_\_\_

Send Copies to: \_\_\_\_\_

- |   | <u>Initials</u> | <u>Date</u> |
|---|-----------------|-------------|
| 1. Typist   | _____           | _____       |
| 2. Preparer (Add or mark through names below as appropriate for review) | _____           | _____       |

**Letters to be submitted in draft (not on letterhead) form to the following:**

- |                          |       |       |
|--------------------------|-------|-------|
| 3. Preparer's Supervisor | _____ | _____ |
| 4. Compliance            | _____ | _____ |
| 5. Attorney/Legal        | _____ | _____ |
| 6. Clerical              | _____ | _____ |
| 7. Signatory             | _____ | _____ |
| 8. _____                 | _____ | _____ |

**Final letter (prepared on letterhead & ready for mailing) to be submitted to the following:**

- |  |                     |                |
|--|---------------------|----------------|
| 1. Preparer (I have re-read this letter for content & quality) | _____               | _____          |
| 2. Data Entry (if applicable)                                  | _____               | _____          |
| 3. Clerical  | _____               | _____          |
| 4. Preparer's Supervisor                                       | _____               | _____          |
| 5. Signature   | _____               | <u>be</u>      |
| 6. Edoctus Barcode Preparation:                                | <u>SW permit #1</u> | <u>3555065</u> |

Letter will be returned to clerical person for copying and mailing.

Date letter mailed/Initial: 1/14/2021 mmw  
Certified Mail # \_\_\_\_\_

(This control sheet is to be attached to file copy of **final letter** and placed in facility file.)