

**From:** Ritter, Christine  
**To:** ["cpec@mindspring.com"](mailto:cpec@mindspring.com)  
**Cc:** [Williams, Ray](#); [Scott, Michael](#); [Gallagher, Tony](#); [Wilson, Donna](#); [Billy Dunham \(cas71@suddenlink.net\)](#); [Albert Rubin \(rubin@ncsu.edu\)](#); [Gary MacConnell \(gsmmacassoc@bellsouth.net\)](#); [Zachary L. Fuller \(zlfmacassoc@bellsouth.net\)](#)  
**Subject:** RE: Craven Ag Compost Facility staff review comments  
**Date:** Wednesday, October 16, 2013 10:59:00 AM

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Following up Donna Wilson's email sent earlier this morning (and included below my email), my comments on the Water Quality Monitoring Plan submitted by Tom Hinson with Cpec Environmental Inc. are included below:

Tom-

I have completed my review of the Water Quality Monitoring Plan for Craven Ag Service (CAS) Compost Facility submitted by Cpec Environmental Inc. on behalf of Craven Ag Service and have the following comments:

Groundwater and surface water monitoring network:

In an effort to reduce costs for the CAS facility, the NC SWS suggests eliminating the proposed mid-site monitoring well, MW-2, from the monitoring well network. The upgradient well MW-1 and two downgradient wells appear to adequately capture and therefore monitor groundwater flow beneath the site. The surface water sampling point MW-2 proposed in the seasonal ditch running through the middle of the site will be sufficient to monitor surface water in that area. Surface water sampling points SW-1 and SW-3 are positions to capture surface water flowing onto and off of the site, respectively.

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Constituent List:

The NC Solid Waste Section (Section) requests that the three groundwater monitoring wells and three surface water sampling locations be sampled for the following parameters:

Appendix I metals plus Mercury and Molybdenum;

Herbicides by Method SW-846

Pesticides by Method SW-846

Total coliform bacteria

Ammonia, Nitrate, Nitrite

pH

Specific conductance

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Sampling frequency:

Again, in an effort to reduce monitoring costs for the CAS facility, the Section is requesting that the three groundwater and three surface water sampling points be sampled for all of the above listed constituents on an ANNUAL basis. The Section requests that the samples be collected during a time of year when water is expected to be present in the seasonal ditch running through the middle of the site, anticipated to be sometime during the months October through March, so that a representative surface water sample can be collected

from location SW-2.

The Section will continue to allow the facility to sample on an annual basis until an exceedance is detected at any of the sampling locations. For the purpose of this Water Quality Monitoring Plan, an exceedance will be considered a concentration above 2L groundwater standards, 2B surface water standards, or a significant increase above background concentrations. At that time, the annual sampling frequency will be reevaluated and a potential corrective action plan may be required.

I will sit in on the conference call to answer any questions you may have.

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**From:** Wilson, Donna  
**Sent:** Wednesday, October 16, 2013 10:01 AM  
**To:** Billy Dunham (cas71@suddenlink.net); Albert Rubin (rubin@ncsu.edu); Gary MacConnell (gsmmacassoc@bellsouth.net); Zachary L. Fuller (zlfmacassoc@bellsouth.net)  
**Cc:** Williams, Ray; Scott, Michael; Gallagher, Tony; Ritter, Christine  
**Subject:** Craven Ag Compost Facility staff review comments

Hello – Below are the remaining review comments on the Craven Ag Compost application. Also, there are comments on the water quality monitoring plan that will be sent to you today separately by Christine Ritter.

We would like to suggest or recommend having a conference call this week to discuss any of these comments. Just let me know me know if you would like to.

1. The coal ash that is to be used for the soil texture modification should be tested for total metals again to ensure consistency of the analysis.
2. Please provide a table listing the loading amount and metals concentration for the ash to be used for the soil texture modification, similar to Bob Rubin's email dated 10-2-12.
3. How will the reworked areas be tested/soil classified to ensure that the modified soil texture meets the requirements of 1404(a)(10)(B), that is, finer than loamy sand? What is the process? How many samples will be taken for soil classification? It should be stated that all

three areas will be tested.

4. Please add a description of the vegetated buffers to the text of the application, in addition to, or instead of, the description on Drawing C-102. As was discussed with Mr. Dunham, the descriptions should state that the buffer areas will receive a layer of compost (provide thickness), disked in, before being seeded.
5. Please provide an update to the Sedimentation and Erosion Control permit application.
6. Please provide analytical data for the DAF skimmings from Maola.
7. Operations Guide – Page 1, Location – Please add the physical site address for the compost operation. I believe it is 5391 River Road, Vanceboro.
8. Operations Guide - Page 8 (Section 1.2, second paragraph) - Please change “bin” to “mixer” or “mix pad.” I assumed “bin” was a storage container or bunker.
9. Section 2.4 – Please remove references to leachate sink and liquid collection basin.
10. The mixing pad detail drawing, 7/D-102, is confusing in that it appears that the mixing area, intended for compost, will be filled in with concrete.
11. Drawing D101 - The distance between curing and finished pile storage should be at least 6 to 8 feet to allow access to firefighting equipment in the event of a fire.
12. If all compost finished product is mixed with wood ash, then the marketing distribution sheet should provide information to the public on the ash, and note any restrictions.
13. The application should contain engineer’s signature and seal.

The wood ash sample that was included in the previous appendices cannot be used because of the high levels of arsenic (see email 4-30-13). We will need other ash sampling analysis from Craven County Energy to show that the ash can be acceptable to mix with the compost at the end. I am checking the files here to determine if I can find the acceptable analysis to meet this requirement. The metal results must meet the ceiling concentrations of Table 1 in the 503 Rules (503.13). This is one item I plan to obtain myself, but if I need additional information I will let you know.

Responses to comments should be incorporated into the text of the application. Please provide replacement pages only for the application, one paper copy and one electronic copy (pdf), and a cover letter that includes responses to comments. Revised pages should include the revision date and page number.

If you have any questions on the comments, please let me know.

Thanks, Donna

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