

Wilson, Donna

From: Wilson, Donna
Sent: Friday, October 23, 2015 10:40 AM
To: Eric Wallace (eric@wallacefarmproducts.com); Bernie Garrett (bgarrett@garrett-moore.com)
Subject: Davie County Compost Facility, review comments
Attachments: Signature page of applicant Wallace.docx

Hello Eric – I reviewed the July 2014 application submitted for the Type 3 operation, before it was modified for the Type 1 operation. Some of the comments below are the same comments that were sent for the Type 1 operation.

1. Please provide:
 - a. Cover letter explaining the permit modification request.
 - b. General information (names, addresses, etc.). See Type 3 application.
 - c. Size of total property, size of actual composting area.
 - d. Provide the FEMA floodplains map with the facility boundaries drawn onto the map.
 - e. Provide a signature page for the applicant. See attached.
2. Feedstocks:
 - a. Please provide more information for the wastewater treatment residuals. If this is from a municipal wastewater treatment plant, it could only be composted at a Type 4 compost facility. Otherwise, we will need analytical data for the residuals.
 - b. Describe the cosmetic production material. What is it comprised of?
 - c. For the cotton material and tobacco material, please clarify if this is crop waste or production material waste. If it is production waste, provide more description of the waste.
 - d. Please be more specific for the animal processing residuals.
 - e. The list on page 1 should be consistent with the list on page 7, and with Table 1.
3. Is wood ash proposed to be added in the beginning with feedstocks, or at the end, as an amendment? What is the generator source of the wood ash? Please provide analytical analysis (total metals), at least four sampling events. Each specific generator of ash must be approved. Describe storage of the ash and methods to prevent/limit surface water run-on and run-off. It should be stated that the samples collected for routine compost analytical testing will be collected after the ash is added.
4. What are the differences in the mixing pit design from what was approved and what was constructed? The as-builts should be included in the application. How will the mixing pit be sealed to prevent seepage leaks to groundwater?
5. The following do not appear to be consistent with this application:
 - a. Section 2.7.4 - Is there a compost storage shed? Is this the same as the finished product storage building?
 - b. Will there be an onsite weather station?
 - c. Are there farm ponds onsite?
 - d. Section 6.0 – There is a reference to Mecklenburg County.
6. Section 5.5 – Contact persons and phone numbers for the Division of Waste Management should be updated. The contact person should include Tony Gallagher, instead of Michael Scott. Our inspector for this county, the senior environmental specialist, is currently not a filled position, but will be in the near future. The text should say that the inspector will be contacted, or the Compliance Section supervisor, Jason Watkins. Tony Gallagher – 919-707-8280, tony.gallagher@ncdenr.gov. Jason Watkins – 336-776-9674, jason.watkins@ncdenr.gov. The main number for the Division of Waste Management is 919-707-8200.
7. The email from the fire department should be added to the application, and referenced in the text.
8. Describe and provide compost recipes (or typical recipes). Show C:N calculations.
9. Describe methods used for measuring, mixing, and proportioning feedstock materials, to insure the proper ratios are met.

10. Operating Plan - During PFRP, temperature should be taken every other day, or at least 3 times per week to verify temperatures.
11. Describe storage of feedstocks - pile size and location. Wood material should be stored in piles no larger than 30 feet high and 50 feet wide. Will there be any storage of nitrogenous feedstocks onsite other than liquids in the tanks?
12. Provide pile size for curing and finished compost. If pile sizes are comparable to the Huntersville site, provide the same description concerning the stable condition and monitoring of the compost.
13. What is the distance between rows, to allow vehicle access in the event of a fire?
14. Provide days and hours of operation.
15. Describe plan to keep litter and dust from leaving the site boundary.
16. Testing – In 1995, the limit for selenium was changed to 100 mg/kg (previously 36 mg/kg) in the septage rules (Table 3), which also changes the limit in the compost rules.
17. Section 3.1.5 states that pathogen sampling will be conducted at least semi-annually. It should be stated that it will be conducted every 20,000 tons of compost produced or every 6 months, whichever comes first. Section 3.2.4 should also be updated.
18. Process Flow Fact Sheet – The size of the two finished product buildings described in text doesn't match the size indicated on the drawing.
19. The operator checklist on page 10 should be updated to show frequency.
20. The issued stormwater and sedimentation and erosion control permits should be added to this application. Also, the wetlands determination should be added.
21. Drawings:
 - a. Sheets 1, 2, and 3 - The floodplain lines are not shown for the area south of the lake, along the northern property boundary. It appears that a part of the proposed compost area is within the 100-year floodplains in this area, or it is very close. Please add the floodplain boundary to the drawings.
 - b. Sheet 1 should show wells located onsite and within ¼ mile. The text indicates there is an onsite well at the existing building.
 - c. Drawing 3 – There are two ponds labeled stormwater pond No. 3.
 - d. Please provide the drawing that shows the locations of the 12 test pits, for soil and groundwater depth, as indicated in text - Site Investigation.
 - e. The site plan drawing should show feedstock and wood waste storage, and should be updated to show as-built conditions.
 - f. The site plan drawing should indicate ground cover (gravel, concrete, soil, etc.).

Please provide an electronic copy (pdf) of the revised application (paper copy optional). Responses to comments should be incorporated into the text of the application. The cover should list the revision date.

If you have any questions please let me know.

Thanks, Donna

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