



FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:											
Lined MSWLF		LCID		YW		Transfer		Compost	<input checked="" type="checkbox"/>	SLAS	COUNTY: Edgecombe PERMIT NO.: SWC-33-03 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incineration		T&P		FIRM	
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

Date of Site Inspection: May 6, 2014

Date of Last Inspection: February 26, 2014

FACILITY NAME AND ADDRESS:

Eastern Composting LLC
 8487 Battleboro-Leggett Rd
 Battleboro, North Carolina 27809

GPS COORDINATES: N: 36.03307 E: 77.74621

FACILITY CONTACT NAME AND PHONE NUMBER:

Name: Jason Smith, Joe Boseman, Ronald Carroll
 Telephone: 252 903 5367 252 446 3636 252 414 3966
 Email address: Jason Smith jasongf@hughes.net
 Fax: 252 446 2431

FACILITY CONTACT ADDRESS:

Jason Smith Partner
 Eastern Composting LLC
 P.O. Box 460
 Battleboro, North Carolina 27809

PARTICIPANTS:

Ben Barnes, NCDENR. Solid Waste
 Jason Smith, Manager/Partner

STATUS OF PERMIT:

Active, permit to operate issued on March 4th 2010, permit expires on March 4, 2015. Application for permit review must be submitted to the Division on or before September 4, 2014.

PURPOSE OF SITE VISIT:

Partial inspection of a Large Type IV Solid Waste Compost Facility

STATUS OF PAST NOTED VIOLATIONS:

NONE

OBSERVED VIOLATIONS:

15A NCAC 13B .1406 OPERATIONAL REQUIREMENTS FOR SOLID WASTE COMPOST FACILITIES
 Any person who maintains or operates a solid waste compost facility shall maintain and operate the site to conform with the following practices:

FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

Page 2 of 6

(1) **Plan and Permit Requirements:** (A) Construction plans and conditions of permit shall be followed

Permit condition:

1. Operation and maintenance of this facility shall be in accordance with the Solid Waste Compost Rules (15A NCAC 13B, Section .1400)
2. Any leachate generated at the facility and any runoff from the facility shall be managed in such a manner that ground or surface water quality will not be adversely affected. The facility shall be maintained to prevent the accumulation of storm water or leachate on travel areas or active composting sites
17. The facility shall be operated in a manner that reduces the potential for vector attraction.

Operation Plan: Leachate Pond Operation and Maintenance states in part:

Maintenance of the pond and swale will include but not limited to:

Swales are to remain cleared of debris to allow free flow of water to the pond. Sediment buildup will be removed on a quarterly basis and re-used within the composting process.

Fix all damages to integrity of the swales and pond liner upon first notice

(4) Leachate shall be contained on site and treated to meet the standards of the off-site disposal method.

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be advised that pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

1. *See additional comments section from previous inspection reports.*
2. Storm water generated leachate (hereafter referred to as leachate) flows off the compost pad to a grassed swale on the northern side of the facility and is supposed to be conveyed to the lined storm water retention pond. **The swale is clogged with sediment and is allowing leachate to pond along the length of the swale. Leachate is flowing off the edge of the pad on the northern, eastern, and western sides of the pad on to the natural soil surface. Leachate must not come in contact with or flow over the natural soil surface. The swales must be reconfigured and constructed in such a manner that leachate flows freely to the storm water retention pond, the turning of equipment does not create ruts that will impound leachate, does not allow leachate to come into contact with natural soil surface and requires little if any maintenance. Constructing the swale of concrete and extending the concrete pad to the swale appears to be the best solution. However the Section will consider other options that will meet the same goal.**
3. **Designate and mark areas for materials receiving.**
4. The Storm water retention pond is permitted by the Division of Water Quality permit number WQ 0033492 1 and is clay lined. **The storm water retention pond must be operated according to the DWQ permit.**
5. Incoming grease waste is being stored in an impoundment on the pad and contained by a berm constructed of compost. This is not an acceptable management practice. **The incoming liquid grease waste shall be incorporated or mixed into the active windrows in a way that prevents excess liquid from standing or pooling on the windrow or the pad.**
6. Problems with the management of the composting operation have been observed during previous inspections. A Notice of Violation was issued regarding this facility on June 19, 2013. This NOV was issued due to incoming feed stocks being placed on the pad in a manner that was causing the generation of excess leachate. The same condition was observed during inspections on July 25, 2013, August 6, 2013, August 20, 2013 and September 11, 2013. A Notice of Continuing Violation was issued with the September 11, 2013 inspection report. Management of the incoming feed stocks has improved so that excess leachate is no longer being generated on the composting pad. Correcting the previously listed violation should have been a simple change in operational procedures but took nearly 4 months. This facility has had and continues to have

FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

Page 3 of 6

operational problems that are not being dealt with. Eastern Composting must take whatever steps are needed to ensure it is operated according to permit requirements and Conditions in 15A NCAC 13B .1400.

7. A Notice of Violation accompanies this inspection report.

Please contact me if you have any questions or concerns regarding this inspection report.

Phone: 252 236 4453 email: ben.barnes@ncdenr.gov

Ben Barnes
 Environmental Senior Specialist
Regional Representative

Sent on: June 2, 2014	X	Email		Hand delivery		US Mail	X	Certified No. 7011 2000 0001 6591 2100
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Copies: Dennis Shackelford, Eastern District Supervisor
 Jessica Montie, Compliance Officer
 Tony Gallagher, Composting and Land Application Branch Head
 Michael Scott, Section Chief

Operation Plan:

Leachate Pond Operation and Maintenance states in part: No water is to bypass the pond nor will any water leave the pond once it has entered unless pumped for use in the composting process or pumped and disposed of properly through waste management. At no time will the water depth be allowed to reach to within one foot of the berm top (freeboard) unless during unusual rainfall event. Maintenance of this system will include inspection of the swales, pond, and integrity of the pond liner after every rainfall event of 1 inch or greater. At no time will the water depth be allowed to reach to within one foot of the berm top (freeboard) unless during unusual rainfall event. During or before an expected extreme rainfall event (or Hurricane) the pond will be completely emptied of water to allow for maximum storage capacity. The Rocky Mount waste water plant has agreed to accept water from this facility when heavy rainfall is expected. Water will be pumped and hauled to Rocky Mount in these instances. On a monthly basis and throughout each turning and composting process, water will be used to the maximum extent to maintain the correct moisture level within the compost windrows



Leachate in the storm water retention pond has been observed to be at the maximum level (within one foot of the berm top) during every inspection conducted over the past year. Evidence that leachate has over washed the berm was observed during an inspection on February 26, 2014. The pump for the pond is kept in Rocky Mount rather than on site. Smith indicated a permanent pump installation is planned but the current DWQ permit does not allow construction in the pond berm. **Allowing the pond depth to remain at the maximum level for an extended period of time would seem to increase the chances of leachate over washing the berm top, especially during periods of heavy rain.**

FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

Page 4 of 6



Leachate observed ponding in the drainage swale on the northern side of the composting pad. **Permit Conditions 2:** This facility shall be operated in such a manner that erosion and runoff from the site shall be controlled. Any leachate generated at the facility and any runoff from the facility shall be managed in such a manner that ground or surface water will not be adversely affected. The facility shall be maintained to prevent the accumulation of storm water or leachate on travel areas or active composting sites.



More leachate observed ponding the drainage swale on the northern side of the composting pad. This view is down slope from the previous photograph.



More leachate observed being ponding in the drainage swale on the northern side of the composting pad. This is further downstream from the first two photos.

FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

Page 5 of 6



Leachate runoff observed on the western side of the composting pad. A drainage swale does not appear to have been constructed on this side of the pad. This appears to be the result of gullies being formed by leachate runoff during heavy rains.

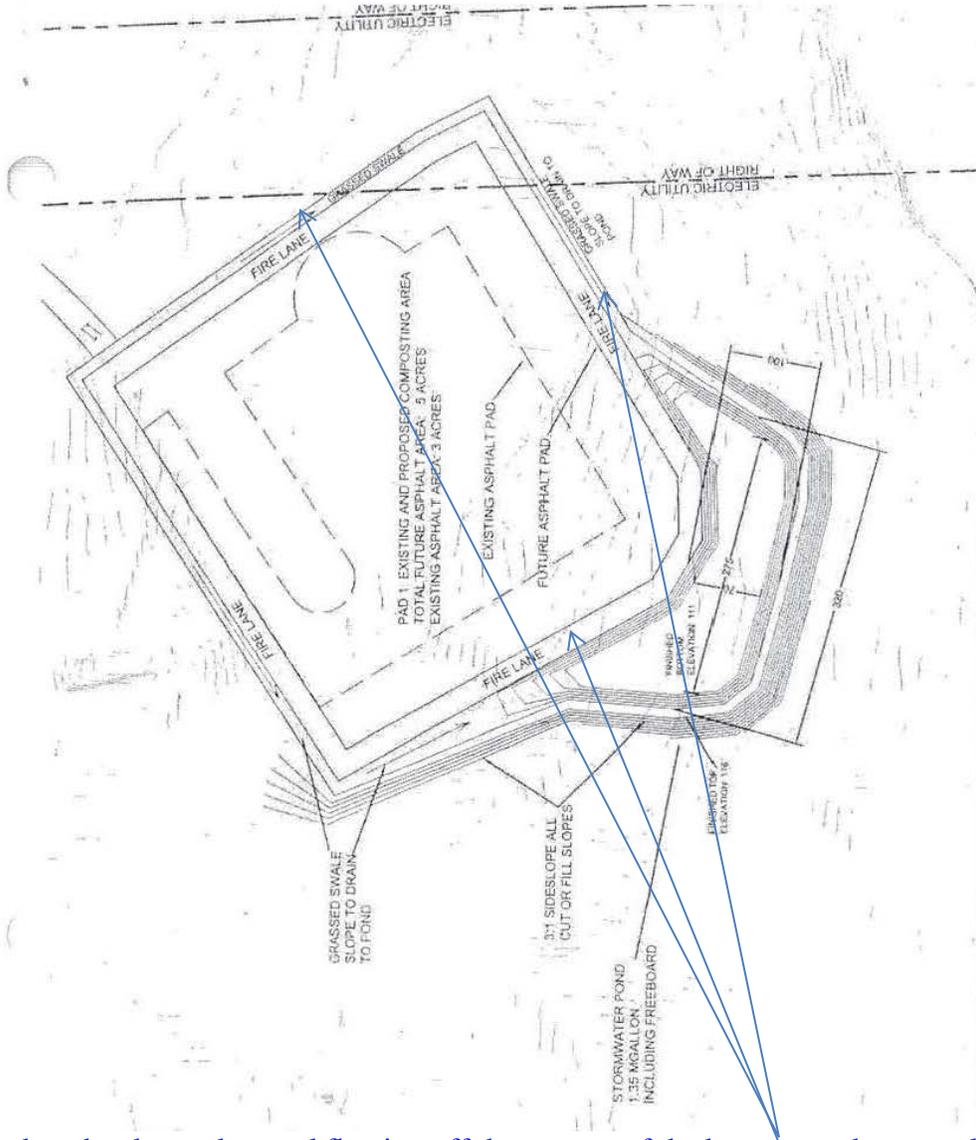


Incoming grease waste is being dewatered by placing in an impoundment of compost.



Incoming material is generally being managed better. This material is now being placed in windrows at the upper slope of the pad. Material in the background could still cause leachate to be impounded.

FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section



Leachate has been observed flowing off these areas of the berm onto the natural soil surface.