



**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

<b>UNIT TYPE:</b>											
Lined MSWLF		LCID		YW		Transfer		Compost	<input checked="" type="checkbox"/>	SLAS	<b>COUNTY: WATAUGA</b> <b>PERMIT NO.: 9505-COMPOST</b> <b>FILE TYPE: COMPLIANCE</b>
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM	
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

**Date of Site Inspection:** 10/2/2014, 10/3/2014, 10/9/2014      **Date of Last Inspection:** 8/29/2013

**FACILITY NAME AND ADDRESS:**

Triple T Pumping  
 916 Troy Norris Road  
 Boone, NC 28607

**GPS COORDINATES:**    N: 36.28566    W: 81.64509

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Mike Garlock and Kim Pierson  
 Telephone: (828) 262-5745

**FACILITY CONTACT ADDRESS:**

1372 N.C. Highway 194 North  
 Boone, NC 28607

**PARTICIPANTS:**

Mike Garlock, Triple T Pumping [10/9/2014]  
 Kim Pierson, Triple T Pumping [10/9/2014]  
 Deb Aja – Solid Waste Section

**STATUS OF PERMIT:**

Active. The Permit to Operate a Small Type III Solid Waste Composting Facility was issued on 7/30/2012 and shall expire on 7/30/2017.

**PURPOSE OF SITE VISIT:**

Partial Inspections of Operations.

**STATUS OF PAST NOTED VIOLATIONS:**

N/A.

**OBSERVED VIOLATIONS**

1. **15A NCAC 13B .0203(d) states:** “By receiving solid waste at a permitted facility, the permittee(s) shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit.”

**15A NCAC 13B .1406(1)(A) states:** “Any person who maintains or operates a solid waste compost facility shall maintain and operate the site to conform with the following practices: (1) Plan and Permit Requirements: (A) Construction plans and conditions of permit shall be followed;”

**Conditions of Operating Permit Condition Number 9 states:**

“The odor management procedures must be followed to minimize odors at the facility boundary.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 2 of 5

Upon receipt of an odor complaint, the facility operator must investigate and take action as necessary to minimize the cause the cause of the complaint. A copy of all written complaints regarding this facility must be maintained for the duration of the permit including the operator's actions taken to resolve the complaints."

**General Permit Condition Number 4 states in part:**

"Operation of this solid waste management facility must be in accordance with the Solid Waste Management Rules, 15A NCAC 13B, Article 9 of Chapter 130A of the North Carolina General Statutes (NCGS 130A-290, et seq.), the conditions contained in this permit, and the approved plan."

The approved plan requires that dewatered septage will be blended with woodchips and sawdust at the beginning of the composting process and that any potential odors will be secured by covering each pile with a 6 inch layer of finished compost or woodchips.

Odors were detected at the site entrance and a property line on 10/2/2014 and 10/3/2014. These odors were attributed to the operations of the compost facility in that dewatered septage was not blended with woodchips and sawdust at the beginning of the composting process nor were the piles of dewatered septage in the compost bin (s) covered with a 6 inch layer of finished compost or woodchips. This constitutes violations of 15A NCAC 13B .0203(d) and 15A NCAC 13B .1406(1)(A). On 10/9/2014 the dewatered septage in the compost process was mixed and covered as required and no odors were detected off site or at the property lines. The odors were minimal at the location of the composting operations. These violations are considered resolved.

2. **15A NCAC 13B .0203(d) states:** "By receiving solid waste at a permitted facility, the permittee(s) shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit."

**15A NCAC 13B .1406(1)(A) states:** "Any person who maintains or operates a solid waste compost facility shall maintain and operate the site to conform with the following practices: (1) Plan and Permit Requirements: (A) Construction plans and conditions of permit shall be followed;"

On 10/2/2014 and 10/3/2014 an area of landfilled compost was observed on the permit holder's property, located approximately 400 feet northwest of the compost facility. The landfill was approximately 25 feet high and 40 feet wide by 100 feet long. Some plastics were observed on the surface. Septage odors from this landfilling activity were detected from the location of the compost facility approximately 400 feet away. On 10/9/2014 the landfill was observed covered with soil and no odors were present. The landfilling of septage compost was not in the approved plans for the facility. The approved plans state that compost produced at the compost facility was to be used as a compost product. This constitutes violations of 15A NCAC 13B .0203(d) and 15A NCAC 13B .1406(1)(A).

To correct this violation and come into compliance, Triple T Pumping must remove landfilled material that can be identified as compost material (distinguishable from soil) and any buried wastes no later than March 30, 2015. Compost material removed from the landfill may be spread on-site at a depth no greater than 3 inches in an area approved in advance by the Section. The compost material may be distributed if it can be demonstrated that it meets the testing requirements of Rule .1408(d)(1-2). Any other buried wastes must be removed and delivered to a permitted solid waste management facility. Follow-up inspections will be made prior to the established compliance date to monitor progress.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 3 of 5



**View of landfilled compost material on 10/3/2014.**



**View of landfill with soil cover on 10/9/2014.**



**Views of settlement crack on 10/3/2014.**

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 also 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.

**ADDITIONAL COMMENTS**

1. The facility is a Small Type III Solid Waste Compost Facility, which was operated as Composting Pilot Project (SWCD-95-01) prior to the issuance of the permit. The compost facility is operated to compost dewatered septage, including and grease septage.
2. The facility is operated at the same location as a permitted Septage Detention and Treatment Facility (Permit SDTF-95-01). The two facilities share the same entrance/gate and access roads.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 4 of 5

3. Waste was received from Avery, Ashe, and Watauga Counties in FY 2013-2014. It was reported in the FY 2013-2014 Facility Annual Report that 150 tons of compost was created from approximately 17 tons of waste that was received by the facility. The total capacity of the site is 100 tons per year and a permit modification is required to increase capacity [see Conditions of Operating Permit Condition #3]. On 10/9/2014 the reported tonnages were discussed on site. It was stated that the materials are not weighed and that the actual tons of compost produced was likely much less than 100 tons per year. **The tonnages of wastes received and compost produced must be accurately tracked and reported. Within 30 days, please provide the methodology used to track tonnages to ensure compliance with the permit. Please contact the Composting and Land Application Branch staff for additional guidance determining tonnages.**
4. Testing. A waste analysis report and pathogen test results were submitted for samples that were received by a laboratory on 6/24/2014 and on 6/26/2014. Within 30 days of receipt of this report please submit the analytical results for manmade inerts in accordance with Rule .1407(c) and temperature records documenting the composting process. Please note that only Class A compost may be distributed without limitations or restrictions and Class B may be distributed with limitations in accordance with Rule .1408(d)(1-2). The compost must be sampled and analyzed at intervals of every 20,000 tons of compost produced or every 6 months, whichever comes first, for parameters for a Type 3 compost facility in accordance with Rule .1408(a)(1).
5. Prior to the inspection a complaint was received regarding strong odors detected off-site. On 10/2/2014 and 10/3/2014 odors were detected on the approach to the facility entrance and at property lines. Dewatered septage was observed in the concrete bins without any bulking agent blended with the septage. The septage was also not covered by a six inch layer of finished compost or woodchips to control odors and vectors. Strong septage odors were present in the location of the bins. Please see the observed violations section of this report. On 10/9/2014 no odors were detected at the entrance and property lines. The septage was mixed with sawdust and covered as required.
6. Flies were observed at the compost operations on 10/2/2014 and 10/3/2014. New fly traps were installed as of the 10/9/2014 inspection (no flies observed).
7. Wood chips and sawdust are used as bulking agents and used to control of excess moisture at the entrance of the bins. While there was no leachate observed outside of the bin area at the time of the inspections, there were no woodchips or sawdust present at the entrance of the bins. **Please ensure that measures described in the approved plans are utilized to control excess moisture.**
8. There was no surface water present at the operational, compost curing, and storage areas.
9. There was no evidence of erosion or movement of silt or contaminants from the site.
10. On 10/2/2014 strong septage odors were also detected upwind of the compost bins. The source of the odors was found to be an area of landfilled compost on the permit holder's property, located approximately 400 feet northwest of the compost facility. The landfill was approximately 25 feet high and 40 feet wide by 100 feet long. Some plastics were observed on the surface. A settlement crack at the surface was visible along the entire length of the landfill. Steam was observed on the side slopes (center) indicating microbial activity was ongoing. On 10/9/2014 it was stated that compost produced at the permitted facility was delivered to this location (rather than distributed for use as compost) and covered with soil in layers. On 10/9/2014 a layer of soil had been placed over the landfill surface and no odors were detected. Please see Observed Violations Section of this report.
11. The site is accepting wastes that it is permitted to receive.
12. The access road was well maintained with a locked gate. A "NO TRESPASSING" sign was posted at the site entrance.
13. Facility setbacks were maintained from exterior property lines. No changes were observed compared to the previous inspection regarding setbacks. The Septage Detention and Treatment Facility and the compost facility operate on two adjoining properties owned by the each of the permit holders. The property line was addressed in the original permitting action.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 5 of 5

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

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Deborah Aja  
Western District Supervisor  
*Regional Representative*

Phone: (828) 296-4702

<b>Sent on: November 18, 2014, to Mike Garlock and Kim Pierson by:</b>		Email		Hand delivery	X	US Mail	X	Certified No. <u>7012 1010 0002 1965 8090</u>
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Copies (via email): Tony Gallagher, Composting and Land Application Branch Head  
Jason Watkins, Field Operations Branch Head  
Elizabeth Patterson, Composting and Land Application Branch  
Sarah Rice, Compliance Officer