

Wilson, Donna

From: Wilson, Donna
Sent: Tuesday, February 09, 2016 3:35 PM
To: Billy Dunham (cas71@suddenlink.net); Gary MacConnell (gsmmacassoc@bellsouth.net); Bob Rubin (rubin@ncsu.edu); Robert Rubin (rubin@arrubinandassociates.com)
Cc: 'shaffersoils@gmail.com'; Tony Gallagher (tony.gallagher@ncdenr.gov); Williams, Ray (Ray.Williams@ncdenr.gov)
Subject: Craven Ag Services Compost Facility - Information needed for approval to operate

Hello Billy, Gary, and Bob,

I've reviewed the construction certification for the Craven Ag Compost Site, submitted by Gary MacConnell last week, and it does address some of the pre-operative conditions for the facility, as outlined in the permit conditions.

The soil report submitted in September from Shaffer Soil Services also satisfies some of the requirements for construction.

I've summarized below in one section the information that has been submitted so far for the site construction, and in the next section I've listed the items that are needed for approval to operate. If you will compare the two sections, you can see what still needs to be submitted/confirmed, to complete the conditions for approval to operate the compost facility. Some items should be addressed by the PE or PG certification, and by the soil scientist or others, and some items can be confirmed by Billy, in writing.

For the site inspection, as listed in the permit condition below, we plan to coordinate a site visit with Billy as soon as possible.

For your reference, the approved application, the Permit to Construct, and other documents can be viewed on our website at <https://edm.nc.gov/DENR-Portal/> (use Internet Explorer). Type in "2514-COMPOST" into the ID value box and click on Search.

Please let me know if you have any questions.
Thanks, Donna

Information that has been submitted:

Soil report – It was stated that the site was cordoned off into 4 sub-plots, and each plot randomly and representatively sampled with a number of samples to form a composite sample. The data support the classification of loamy fine sand which does technically represent a texture finer than loamy sand. No sketch or diagram was provided. (Note – The Solid Waste Section has agreed that the soil data does show that the samples meet the Rule requirement of finer than loamy sand).

Certification – The certification states that construction was in accordance with the plans and specs, and the Permit to Construct issued by Division of Water Resources (this should be the Solid Waste Section). It is noted that boundary markers need to be re-installed, and it recommends sampling of the wells if it hasn't been done. The report included photos of the existing operation, windrows, 2 wells, pad, and new mixing pit.

Information that is required to be completed/submitted:

The following are the pre-operative conditions as copied from the Permit to Construct, pages 4 and 5. I've inserted a text box quoting from the approved application for the reference in condition 5.a. ii.

5. An approval to operate by the Section is required prior to commencement of operations at the compost facility. The following requirements must be met prior to issuance of an approval to operate:
 - a. Construction must be completed in accordance with the approved plan. A construction quality assurance (CQA) report must be submitted for approval, that includes:
 - i) Documentation of construction and testing of the entire boundaries of Areas 1, 2, and 3, including photos. The report must document the field tests, including a sketch of sampling locations and a table listing the soil sampling locations, depths, and texture results, at a frequency of at least 10 per acre at varying depths down to 12 inches. Testing must include at least one lab sample from each of the three areas, as a composite sample of 20 subsamples per acre collected at varying depths down to 12 inches. The report must include notes of failed tests, steps taken to correct the failure, and repeat testing.
 - ii) Documentation of construction of the vegetated buffers around the three areas, including photos. The report must describe construction in accordance with the Operations Guide (50 foot buffer surrounding the three areas are covered with at least one inch of compost, lightly disked, and planted with grass), and also the notes and tables on Drawing C102 (see Doc ID 21126, pdf pages 36 and 234).
 - iii) Certification either by a North Carolina registered professional engineer, or by a North Carolina registered professional geologist, that the facility was constructed in accordance with the approved plan.
 - b. Boundary markers must be installed around the perimeter of the three areas, to mark the required setback to the property line, to the 100 year floodplain, and to the residence across the road (reference Drawing C-102). The distance between markers must be sufficient to allow for line of sight from one marker to the next.
 - c. Groundwater wells must be installed in accordance with the Water Quality Monitoring Plan (Doc ID 20787) and with 15A NCAC 2C. Well installation logs, Form GW-1, must be submitted to the Section. A licensed geologist must be present to supervise the installation of groundwater monitoring wells.
 - d. Each groundwater monitoring well must be surveyed for location and elevation, measured from a permanent USGS Survey benchmark of known elevation. Each groundwater monitoring well must have an identification plate permanently attached to the well, in accordance with 15A NCAC 2C .0108(o).
 - e. The initial baseline groundwater and surface water sampling event must be performed.
 - f. The temporary erosion control berms and straw waddles used in construction must be removed.
 - g. If there were any necessary construction changes to the site layout as shown in the approved plan, then one electronic copy (pdf) of the construction record (as-built) drawings must be submitted to the Section.
 - h. A site inspection must be made by a representative of the Section.
6. A representative of the Section shall notify the permittee by letter or e-mail when the pre-operative conditions have been met. The permittee may begin operation of the new facility at that time.

P. 36 - "Vegetative buffers will be covered in one inch of compost, lightly disked, and planted with fescue. A soil test will determine the optimum nutrient requirements."
p. 234 - "Provide 50' minimum vegetated buffer (woodland or crops) around perimeter of sites 1, 2, and 3. Permanent vegetated buffers shall be established downslope of the compost production site prior to operating the facility." A table is listed on the page with recommended types of grass and application rates.

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