

## Wilson, Donna

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**From:** Wilson, Donna  
**Sent:** Monday, February 11, 2013 5:47 PM  
**To:** Steve Cockman (scockman@mcgillcompost.com)  
**Cc:** Noel Lyons (nlyons@mcgillcompost.com); John Patrone (john.patrone@ncdenr.gov)  
**Subject:** Comments on the modification application, McGill Compost Facility

Hi Steve – This email is to follow up our phone conversation last Monday.

During my recent site visit, there were a few things that came up that our Section would like to clarify.

When we were reviewing the analytical results, it was discovered that both fecal coliform and salmonella were being analyzed. For some of the tests, fecal coliform did not pass, but salmonella did. While it is correct that our rules do state that either test is to be analyzed, we still cannot ignore that one of the tests did fail. In the future, we would like fecal coliform to continue to be sampled, at least for a year, and that if it does not pass another confirmation sample should be taken right away and analyzed for quick turnaround (3 to 4 days). If the second sample also fails, then the compost distribution should stop.

In the permit modification application, the composting method and series of operational steps being followed at the site do not follow the descriptions in the application.

1. On page 2 , under Management of rainwater, please update the statements, “This area has not been in use since becoming open. We propose to use the area primarily to store compost.” The section should state that the area is in use, and describe the state of the compost that is stored there. The text appears to described finished compost.
2. On page 4, under Changes to the composting process, the text should describe the operational flow of the compost process, similar to - after mixing the compost is placed in the bays for x number of days to meet PFRP, then the compost is stored in the uncovered area in the building for x number of days. It is screened and stored outside for x number of days, and it is placed in the curing bay area for x number of days to meet VAR, etc. This is a change to the compost process as was described in the current approved Operating Plan from 2010, pages 8 through 10.
3. On page 4, under Amounts of curing compost, 2<sup>nd</sup> paragraph, the text appears to describe finished compost that is to be stored in the uncovered area. The compost is also called “product” which implies that it is finished compost. Please clarify that this is compost that has met PFRP but not yet met VAR.

Please make changes to those pages in the application to clarify the compost operation. It is not necessary to resubmit the whole application, just replacement pages for those pages that were changed.

If you have any questions please let me know.

Thanks, Donna

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