



FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:											
Lined MSWLF		LCID		YW		Transfer		Compost	X	SLAS	COUNTY: Chatham PERMIT NO.: 19-05 SWC 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 Inspection: February 20, 2014

Date of Last Inspection: January 10, 2013

FACILITY NAME AND ADDRESS:

Brooks Contractor, Inc. – Large, Type 3 Solid Waste Compost Facility
 1195 Beal Road
 Goldston, NC 27252

GPS COORDINATES: N: 35.54431 E: -79.36780

FACILITY CONTACT NAME AND PHONE NUMBER:

Amy Brooks, Manager
 Brooks Contractor, Inc.
 w. 919-837-5914
 f. 919-837-5097
 c. 919-842-6063
amy@brookscontractor.com

FACILITY CONTACT ADDRESS:

Amy Brooks, Manager
 Brooks Contractor, Inc.
 1195 Beal Road
 Goldston, NC 27252

PARTICIPANTS

John Patrone, Environmental Senior Specialist - Solid Waste Section (SWS)
 Amy Brooks, Manager - Brooks Contractor, Inc.
 Alan Brooks, Site Manager - Brooks Contractor, Inc.

STATUS OF PERMIT:

Permit To Operate (PTO) issued January 22, 2010
 PTO expiration date January 22, 2015

PURPOSE OF SITE VISIT:

Comprehensive Inspection

STATUS OF PAST NOTED VIOLATIONS:

None

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OBSERVED VIOLATIONS

None

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.

ADDITIONAL COMMENTS

On February 20, 2014, John Patrone met with Amy Brooks and Alan Brooks to conduct a comprehensive inspection of the Brooks Contractor, Inc. – Large, Type 3 Solid Waste Compost Facility on Beal Road in Goldston, Chatham County.

1. The facility is a Large, Type 3 Solid Waste Compost (SWC) Facility. It produces compost from eggshell/hatchery waste, food waste (pre-consumer and post-consumer), yard waste (primarily leaves), wood mulch, animal bedding, grease trap waste, etc. (as listed on page 5 of the current Facility Operations & Maintenance Manual) and additional materials approved by the Division of Waste Management (DWM).
2. Material is received from numerous counties within North Carolina.
3. The facility permit, site map, and operations plan were discussed.
4. The compost produced is primarily sold to construction and landscape contractors, farmers, and landscape supply businesses.
5. Compost can be mixed with sand, pine bark fines, PermaTill, or per custom blend.
6. Compost operation is conducted on ~ 25 acres.
7. The facility is in operation Monday through Friday 7:00 am to 5:00 pm and Saturday 8:00 am to 12:00 pm (March through November).
8. Liquid material is dumped into a liquids bulking and mixing pit and semi-liquid material is unloaded onto an adjacent concrete pad.
9. The liquid material is mixed with absorbent bulking material and placed on the concrete pad.
10. The concrete pad has drain grates that captures leachate and allows it to flow either to the liquid bulking and mixing pit or to two 3,500 gallon concrete storage tanks.
11. The concrete storage tanks are used to settle-out sludge and particulate material. A 10,000 gallon steel storage tank is used to store the leachate drained from the two concrete storage tanks. The leachate is pumped-out and used on compost windrows.
12. Odorous material may be stored in a static pile until enough is on-hand to create a windrow. Static piles are covered with a layer of uncured compost.
13. Other wastes are stockpiled until it can be incorporated into a windrow.
14. The facility commonly uses leaves, cardboard, mulch, feed waste, and yard waste as bulking material.
15. During the fall and winter months, the facility receives leaves from the town of Cary and Siler City. The leaves are stockpiled for use, maintained accordingly.
16. Active windrows are organized into separate operational areas: eggshell and non-eggshell.
17. Windrows appeared to be within required dimensions. Eggshell windrows are commonly 350 feet in length and non-eggshell windrows are commonly 200 feet long.
18. During the inspection the facility had 40 active windrows.
19. The facility uses a windrow-turning machine to turn active windrows. Windrows are constructed with a front end loader.
20. Windrows are commonly maintained for 2 to 5 months. The material is generally cured for an additional 4 to 12 months.
21. Compost is screened prior to sale and stored in piles. Currently, there are three large piles of cured compost.
22. Stockpiled cured/finished product is limited to a height of 60 feet.
23. The facility operational capacity is limited to 75,000 tons of feedstocks per year received for composting.

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24. Vehicle scale calibration was conducted by Central Carolina Scale, Inc. on July 16 and October 2, 2013. The record for each test state the scale is good.
25. The facility annual report (FAR) was received by the SWS, dated July 22, 2013. Material received for July 2012 through June 2013 is 53,050.12 tons. The amount of compost produced is 29,127.73 tons.
26. The facility maintains records of the amount of material received for processing. The amount of material received from July 2013 through February 25, 2014 is 36,000 tons. The amount of compost sold from July 2013 through February 25, 2014 is 12,048.3 tons. The amount of cured compost on site as of February 25, 2014 is 60,477.3 tons. And the amount of leaves stockpiled on site as of February 25, 2014 is 6,233.58 tons.
27. The facility produces Grade A compost and offers an information pamphlet for customers. Ms. Brooks stated that much of the cured compost will be sold through May [2014].
28. The facility has three temperature probes. Monthly records were verified for temperature probe calibration from 02/15/12 through 02/15/14.
29. Windrow records were verified. The facility maintains written windrow data. Records for temperature, moisture level, turning intervals, bulk density, and C:N calculation were observed for windrows formed on 01/29/13 - taken up on 07/15/13, 06/02/13 - taken up on 11/07/13, and 08/17/13 - taken up on 01/28/14. The facility uses Green Mountain Technologies, Inc. windrow manager software. The program allows the facility to electronically maintain active windrow data, calculate windrow bulk density and C:N ratio, and record and graph data.
30. Ensure bulk density and C:N calculations are reviewed no less than every 14 days.
31. Windrow turning records show that the facility turns windrows at least five times during the high temperature period.
32. The moisture level is measured by hand per the method outlined in the current Facility Operations & Maintenance Manual, pg 12.
33. Compost analysis records were verified for nutrients, heavy metals, manmade inerts, fecal coliform, and salmonella received (for analysis) 02/06/13, 03/29/13, 06/14/13, 06/26/13, and 10/31/13. The samples were analyzed by Soil Control Lab, Watsonville, CA. Ms. Brooks stated that the facility has the nutrient sample analysis routinely conducted by the North Carolina Department of Agriculture & Consumer Services (NCDA&CS) – Agronomic Services Division.
34. The facility has a dedicated water truck for dust control.
35. There was no odor detected at the facility boundary.
36. The facility has not received an odor complaint.
37. Erosion and sedimentation controls appeared to function accordingly.
38. The facility has a clay-lined stormwater pond. Stormwater is pumped-out to be used in the active windrow process. The facility does not discharge stormwater from the containment pond but can pump and haul to the Siler City Wastewater Treatment Plant if it is nearing capacity.
39. Mr. Brooks stated that the facility has not recently hauled stormwater to the wastewater treatment plant.
40. Mr. Brooks stated that although the stormwater pond is near minimum freeboard it is continually pumped-out and used on the active windrows.
41. Mr. Brooks stated that a stormwater discharge permit is not required because stormwater remains onsite.
42. The facility has received a permit to construct a containment pond irrigation project from the Division of Water Quality (DWQ). It is planned that a pipe from the stormwater pond will be buried underneath the active compost area to an adjacent field. When sufficient stormwater is available, the facility can irrigate three fields with a portable irrigation sprinkler. Ensure the project is discussed with SWS – Permitting Branch prior to construction.
43. The Goldston Fire Department will be contacted to address an emergency at the facility. Fire lanes were maintained.
44. The facility is secured by locked metal gate (the Brooks' residence is located at the entrance drive to the facility). Facility personnel are on site during operating hours.
45. Access roads are of all weather construction.
46. The facility has proper signage.
47. The PTO expiration date is January 22, 2015.

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48. The PTO renewal application should be submitted to the SWS by ~ September 22, 2014.

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



Phone: 336-771-5095 Fax: 336-771-4631

John Patrone
Environmental Senior Specialist
Regional Representative

Sent on: <u>February 26, 2014</u>	X	Email		Hand delivery		US Mail		Certified No. []
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Electronic Copies:

Jason Watkins, Western District Supervisor
Sarah Rice, Compliance Officer
Tony Gallagher, Supervisor - Composting & Land Application Branch
Donna Wilson, Permitting Engineer
Liz Patterson, Environmental Technician - Composting & Land Application Branch
Alan Brooks, Brooks Contractor, Inc., alan@brookscontractor.com

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Digital pictures taken February 20, 2014
by John Patrone, DWM-SWS

Liquids bulking and mixing pit



Active process windrows



Stormwater retention pond



Cured compost pile (background) and screened compost

