

**From:** Wilson, Donna  
**To:** ["Billy Dunham"](#); ["Robert Rubin"](#); ["Gary MacConnell"](#); ["Zachary L. Fuller"](#)  
**Cc:** [Scott, Michael](#); [Gallagher, Tony](#); [Ritter, Christine](#); [Williams, Ray](#)  
**Subject:** Craven Ag Compost Facility review comments  
**Date:** Tuesday, April 15, 2014 4:23:00 PM

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Hello, I've reviewed the latest permit application submittal for the Craven Ag Compost Facility, and I have the following questions and comments:

1. The second page of ash memo should be worded "finer than loamy sand," instead of "finer than fine sand." Two sentences: (1) Metal loadings are not a limitation in the design of the pad system required to create a soil texture finer than fine sand. ", and (2) "These areas have been tested previously and were found to contain soil characterized as fine sand; rule requires soil material classified as finer than fine sand."
2. Please add units to the table headings. For column 1, EPA Clean, "monthly average mg/kg" should be added. For column 2, EPA load (lb/ac), "Lifetime" should be added. For the last column, the numbers listed are pounds per acre of each of the metals, so the heading should be something similar to "Cumulative Metal Load, lb/acre." Alternatively, this information can be added as referenced footnotes to the table, to include that the first two columns are taken from the 503 Rules.
3. The application text should state that soil texture sampling and testing will include at least one lab sample from each of the three areas, as a composite sample of the 20 subsamples per acre collected at varying depths down to 12 inches. The application text should describe documentation of the field tests, including a sketch of sampling locations and a table listing the soil texture results, at a frequency of at least 10 per acre at varying depths down to 12 inches. The application text should state what actions will be taken if a field sample fails or a lab sample fails.
4. The last previous comments stated that the ash memo should state that the ash and compost will be incorporated to all three areas, not just Areas 1 and 2. In the response to these comments, the ash memo has been corrected as requested; however, additional new language has now been added to another part of the application, Section D.2, which directly contradicts this. The new language again states that the ash and compost will be only applied to Areas 1 and 2. You should have discussed this with us before you made this unexpected change, or at least you should have noted this new change in the response letter. We would expect that the soil texture of some portions of the existing compost area has been modified because of the ongoing compost operation, but we would not expect it to be to a depth of 6 to 12 inches or that it would cover the entire area of Area 3. If Area 3 can pass the same field tests and laboratory test as the other areas, as described in comment #3 above, without the additional incorporation, then we can accept that. A description of how this will be accomplished should be described in the application.

Responses to comments should be incorporated into the text of the application. Please provide replacement pages only for the application, one paper copy and one electronic copy (pdf), and a cover letter that includes responses to comments. Revised pages should include the revision date and page number.

If you have any questions or comments please let me know.  
Thanks, Donna

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