

Steven Flynn

From: Wilson, Donna <donna.wilson@ncdenr.gov>
Sent: Wednesday, January 08, 2014 10:27 AM
To: Steven Flynn (steven.flynn@sanfordnc.net); larry.craig@sanfordnc.net
Cc: Hearn, Robert; Pickle, Ken
Subject: Comments on the City of Sanford Compost application

Hello Steve and Larry – I've reviewed the application for modification to the City of Sanford Compost Facility, to downgrade the site from a Type 3 to a Type 1, and there a few comments that need to be addressed:

1. Please provide an update to the status of the water discharge permit. Since the site has changed to Type 1, have you applied for the NCG24 stormwater permit? Please contact Ken Pickle if you have not yet applied.
2. Section 4, I.D.4 and III.C.3 – The temperature in the piles should not be averaged. The temperatures at all points must meet the minimum temperature requirement for 3 days.
3. Section 4, I.E.1, Flow Diagram, and possible other sections – Compost testing for metals, pathogens, and foreign matter is not required for Type 1 facilities.
4. Section 4, F – It should be stated that stockpiling of finished compost will be in piles no larger than 30 feet high, 50 feet wide, with unlimited length.
5. Section III. F and G – These sections do not appear to apply to the compost facility. Please explain or clarify discussion of fill, concrete, asphalt, pipes, and leachate basins.
6. Section 5, page 4 – Does the sign at the entrance have the correct permit number? The permit number listed in the text is incorrect, 50-03-YW. It should be 5303-Compost (53-03-YW would be OK too).
7. Section 5, page 6 – Temperatures have to be maintained for 3 days instead of 15 days, for a Type 1 compost site.
8. Section 3, page 6; Section 3 page 9; and Section 5, page 23 – The text should be corrected to exclude chicken manure.

Section 4 page 10

Please make corrections to the text of the application and submit a revised application. The drawings/large maps do not need to be resubmitted. An electronic copy (pdf) of the revised application is acceptable, or one paper copy. If you have any questions please let me know.

Thanks, Donna

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Response to
comments
rec'd
2-24-14
DW

.1404 SITING/DESIGN REQUIREMENTS FOR SOLID WASTE COMPOST FACILITIES

(a) A site shall meet the following requirements at the time of initial permitting and shall continue to meet these requirements throughout the life of the permit only on the property owned or controlled by the applicant or by the landowner(s) at the time of permitting:

- (1) A site located in the floodplain shall not restrict the flow of the 100-year flood; reduce the temporary storage capacity of the floodplain; or result in washout of solid waste so as to pose a hazard to human life, wildlife, land or water resources.

The site is not located in a 100-year floodplain.

- (2) A 100-foot minimum buffer is required between all property lines and compost areas for Type 3 and 4 facilities, 50-foot for Type 1 or 2 facilities.

All buffers between active composting areas and the property line of the facility exceed the 100-foot minimum buffer requirement.

- (3) A 500-foot minimum buffer is required between compost areas and residences of dwellings not owned and occupied by the permittee, except that Type 1 and Small Type 2 and 3 facilities shall have a 200-foot minimum buffer.

As originally constructed (and shown on the enclosed site plan), a portion of the windrow area does not meet this 500-foot minimum buffer. Active composting of leaves shall take place in windrow areas beyond the 500-foot minimum buffering requirement. Only mature compost shall be stored in windrows 9, 10, and 11.

- (4) A 100-foot minimum buffer is required between all wells and compost areas, except monitoring wells.

All buffers between composting areas and any known well site exceed the 100-foot minimum buffering requirement.

- (b) For Subparagraphs (a)(2) through (a)(4) and Part (a)(10)(B) of this Rule, (dependent upon waste type, facility design, and regional topography) alternative minimum buffers or requirements may be increased if deemed necessary by the Division in order to protect public health and the environment or to prevent the creation of a nuisance.

It is our belief that, due to the information provided, no increase in buffering is warranted.

- (c) A site shall meet the following design requirements:

- (1) A site shall not allow uncontrolled public access.

The perimeter of the site is fenced with lockable gates controlled by the City of Sanford.

- (2) A site shall meet the requirements of Sedimentation Pollution Control Law (15A NCAC 4).

Prior to construction an erosion and sediment control plan was submitted and approved. The plan was implemented during the course of the construction and, upon completion of construction, the city received approval from the North Carolina Department of Environment, Health, and Natural Resources, Land Quality Section. This approval was reaffirmed by Debbie Fuquay of the above department on 8/7/97.

- (3) A site shall meet the requirements of the Air Pollution Control Requirements (15A NCAC 2D) to minimize fugitive emissions and odors.

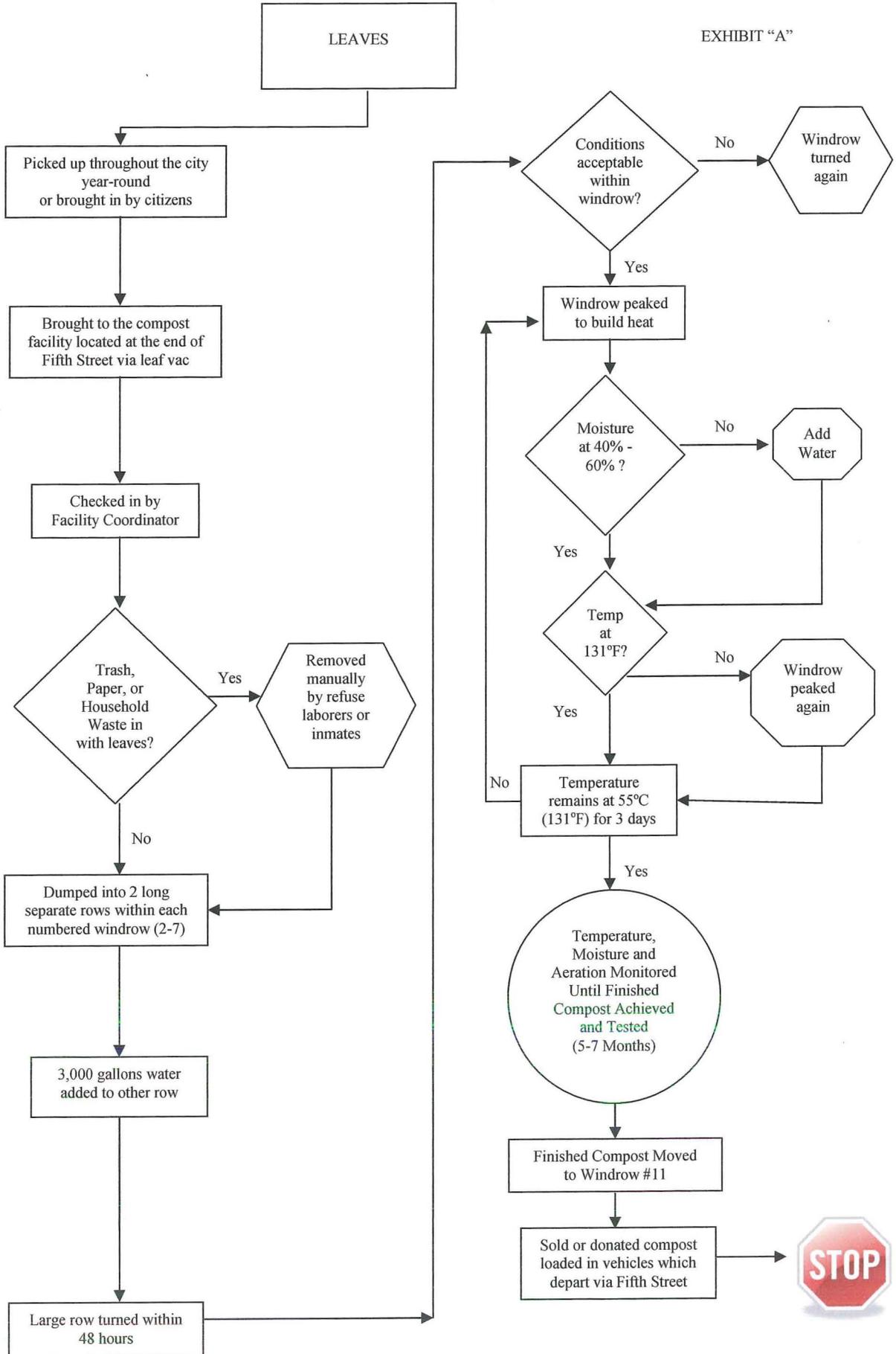
Air pollution is minimized by covering all nitrogen-bearing waste with wood chips and incorporating it into windrows within 48 hours after arrival at the site.

- (4) A site shall be designed to minimize odors at the property boundary.

The site is located in a sparsely populated area and minimum buffer requirements are met.

LEAVES

EXHIBIT "A"



3. Moisture must remain at 40% to 60%. To check, reach into pile with hand and pick some up and squeeze. If water runs out it is too wet, if it doesn't stick together it is too dry.
4. Temperature readings must be taken in each windrow at three points (each end and in the middle) and must maintain a minimum temperature of 131 degrees F (55 degrees C) for three consecutive days.
5. Turning is done with the front end loader and a pull-behind TS-616 Wildcat Compost Turner. This process is repeated until finished compost is achieved.

E. STOCKPILING

1. This procedure is done when there is an excess of finished compost and it is necessary for additional compost to be processed for future needs.
2. When stockpiling, the finished compost is taken from the windrows by the Front end loader and loaded on the compost facility dump truck.
3. The compost is then trucked over to windrow #11 where it is dumped and later pushed into a large pile with the front end loader. Stockpiling of finished compost will be in piles no larger than 30 feet high, 50 feet wide, with unlimited length.

2. Monthly and yearly reports are combined (see for marked Exhibit “E” attached). They include the following information:
 - a. Month
 - b. Cubic yards of wood chips sold
 - c. Cubic yards of compost sold
 - d. Loads out
 - e. Times turned
 - f. Windrows turned
 - g. Times temperature taken
 - h. Average temperature
 - i. Man hours
 - j. Equipment hours
 - k. Dollar amount sold for the year
3. Temperatures must be taken from each windrow at three points (each end and in the middle) and must maintain a minimum temperature of 131 degrees F (55 degrees C) for three consecutive days.
4. Unmetered Water Report (see form marked Exhibit “G” attached)- is report of water used by the compost facility. It includes the month, location used, quantity in gallons, and total.

D. EQUIPMENT MAINTENANCE

1. All equipment is maintained according to manufacturer’s specifications.
2. All servicing of equipment is done by trained professionals at the City of Sanford’s public works garage.

E. TRAINING PERSONNEL

Laborers from other public works divisions are sometimes used to helping load vehicles and other minor job tasks. During training, each individual shall receive proper hands-on training with equipment to be used and receive a copy of the operation manual from the manufacturer on that particular piece of equipment.

VIII. Sign Requirements:

- A. Signs providing information on waste that can be received, dumping procedures, the hours during which the site is open for public use, the permit number and other pertinent information shall be posted at the site entrance.

1. *The following signs are posted at the site entrance:*

a. *"No dumping without checking with operator or service center first."*

b. *"City of Sanford Municipal Compost Facility*

Owner/Operator: City of Sanford

In case of emergency: 775-8247

Larry Craig, Refuse Superintendent

Operating Hours: Monday-Friday

8:00 AM – 12:00 Noon

1:00 PM – 5:00 PM

Permit No. 53-03YW

- B. Traffic signs/markers shall be provided as necessary to promote an orderly traffic pattern to and from the discharge area and to maintain efficient operating conditions.

All traffic signs or markers are provided to promote an orderly traffic pattern within the facility, and "Yield" signs and "Speed Limit, 10 MPH" signs are posted in conspicuous places throughout the facility.

- C. Signs shall be posted stating no hazardous waste, asbestos containing waste, or medical waste can be received at the site.

1. The following sign is posted at the site entrance:

"No hazardous waste, asbestos-containing waste, or medical waste will be accepted."

IX. Monitoring Requirements

- A. Specified monitoring and reporting requirements.

All monitoring and reports as required by our permit are complete on a daily basis, and kept on file for at the compost facility.

- B. The temperature of all compost produced shall be monitored sufficiently to ensure that the pathogen reduction criteria is met.

In order to ensure the pathogen reduction criteria is met, temperatures are taken 3 times weekly to assure that an adequate temperature of 131 degrees F (55 degrees C) or greater is maintained in the windrow for at least 3 days.

- X. The composting process shall qualify as a process to further reduce pathogens for all Type I facilities. The following are acceptable methods:

Windrow composting method: temperatures are taken 3 times weekly to assure that an adequate temperature of 131 degrees F (55 degrees C) or greater is maintained in the windrow for at least 3 days.

- A. DOES NOT APPLY TO THIS FACILITY.
- B. DOES NOT APPLY TO THIS FACILITY.

- XI. Nitrogen bearing wastes shall be incorporated as necessary to minimize odor and the migration of nutrients.

Odors are minimized by the covering of all windrows with wood chips when odors exist.

- XII. Miscellaneous Requirement

- A. The finished compost shall meet the classification and distribution requirements outline in Rule 1407 of this section.

4. RECORD KEEPING REQUIREMENTS

The facility coordinator keeps daily, monthly, and yearly reports, as well as temperature charts and unmetered water reports.