

### State of Mississippi

### TATE REEVES

#### Governor

#### MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

August 10, 2022

Mr. Greg Prine MC Environmental, LLC 60 Dyess Circle Columbia, MS 39429

Re: Pilot Composting Facility Authorization

MC Environmental, LLC

Columbia, MS (Marion County)

Dear Mr. Prine:

The Mississippi Department of Environmental Quality (MDEQ) has completed our review of the request for authorization and supporting information submitted on behalf of MC Environmental, LLC (MC Environmental) by Mr. Ken Ruckstuhl to operate a pilot composting facility for vegetative debris. The request and supporting information was originally submitted on May 3, 2022 and supplemented on May 12 and July 15, 2022.

The sources of materials to be composted include vegetative debris segregated or diverted from the nearby MC Environmental Class I Rubbish Site (SW0460020606), local vegetative storm debris, and other sources approved by MDEQ. The proposed operation would produce compost for sale to the landscape nursery industry and for soil enrichment to facilitate vegetative growth at the MC Environmental Class I Rubbish Site.

Based on our assessment of the request and the information provided, MDEQ has determined that the composting operation can be established and conducted without a formal solid waste management permit. In lieu of a formal permit, MDEQ hereby provides concurrence that MC Environmental may operate a pilot vegetative debris composting facility located north and adjacent to Columbia-Purvis Road, Columbia, MS (approximately N 31° 13' 22.0", W 89° 44' 38.37") in accordance with the attached conditions which supersedes some portions of the submitted plan of operations.

Please be mindful that MC Environmental is responsible for maintaining compliance with the approved plan of operations as submitted with the request for authorization, as well as the attached operating conditions. MC Environmental is further responsible for notifying MDEQ in advance of any changes to the facility's operations. MDEQ reserves the right to withdraw this authorization, modify the attached operating conditions, or to require MC Environmental to obtain a formal solid waste management permit if problems are encountered, if operations expand beyond that described in the application, or if regulatory requirements change.

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Should you have any questions, please contact Mr. Ross Williams with the Waste Division at 601-961-5171.

Sincerely,

Trent Jones P.E., BCEE, Chief, Waste Division

#### Attachment

cc: Ethan Mayeu, Solid Waste Compliance and Enforcement Branch

Ken Ruckstuhl, Environmental Management Services, Inc.

# OPERATING CONDITIONS (1 of 2) MC Environmental, LLC Composting Site Columbia-Purvis Road Columbia, MS

- MC Environmental, LLC, herein referred to as the operator, is authorized to stage and compost clean vegetative debris consisting of grass clippings, leaves, limbs, trees, and other similar woody materials segregated or diverted from the nearby class I rubbish site (MC Environmental Class I Rubbish Site, SW0460020606), local vegetative storm debris, and other sources approved by MDEQ.
- 2. The operator shall keep all vegetative debris within the confines of the operating area described in the approved plan of operations. The operator shall keep all material stockpiles at least 200 feet from property lines and 250 feet from the banks of the Upper Little Creek.
- 3. The operator shall maintain adequate security at the site to prevent uncontrolled access and disposal. Access to the site shall be restricted by a locked gate or other means at all times that the operator does not have personnel on site.
- 4. Prior to the unloading of each incoming waste load, designated facility personnel shall visually inspect each material load and remove any materials other than those described in Condition 1 of this document. Unauthorized materials (e.g. treated wood, rubbish, etc.) that cannot be composted shall be separated and removed to an appropriate permitted disposal facility. Loads with significant amounts of unauthorized materials should be rejected for unloading at the facility.
- 5. The operator shall ensure that the amount of unprocessed and composted material stored on the site does not exceed 10,000 cubic yards in total volume. Material stockpiles shall not exceed 12 feet in height at any given time. The operator shall ensure that the final composted material is removed from the site at a frequency necessary to maintain the volume and height storage limits of this condition.
- 6. The operator shall ensure that the final compost product will pass through a 4 inch screen prior to distribution or onsite uses.
- 7. The open burning of unauthorized materials is prohibited at the site. Adequate space between storage piles shall be maintained in order to prevent the spread of an accidental fire to the piles. Fire lanes shall be maintained at all times by the operator as described in the operation plans. The operator shall take immediate action to extinguish any accidental fires and shall notify MDEQ as soon as possible.
- 8. The operator shall insure that storm water from the site is managed appropriately. The following storm water control measures should be implemented as necessary:
  - a) The operator should ensure that storm water leaving the site is generally free from silt, wood chips, and other materials stored on site.
  - b) To the extent possible, storm water and other waters upslope of the composting area shall be diverted away to prevent run-on.
  - c) To the extent possible, the operator should minimize the amount of surface area of unprocessed and processed material storage areas exposed to rainfall.

# OPERATING CONDITIONS (2 of 2) MC Environmental, LLC Composting Site Columbia-Purvis Road Columbia, MS

- d) To the extent possible, storm water and other waters upslope of the composting area shall be diverted away to prevent run-on.
- e) To the extent possible, the operator should minimize the amount of surface area of unprocessed and processed material storage areas exposed to rainfall.
- f) Should problems arise related to runoff from the operations, the operator should implement best management practices (BMP's) to limit impacts to surrounding surface waters. These BMP's may include establishment of perimeter vegetation, straw bale dikes, silt fences, earthen dikes, earthen berms, drainage swales, sediment traps, and/or temporary sediment basins.
- g) The operator is encouraged to implement provisions that would minimize off-site vehicle tracking of product or sediment.
- h) The operator shall conduct storm water inspections routinely and shall repair, replace or supplement non-functioning storm water controls within 24 hours of discovery.
- 9. The operator shall maintain the following daily records of the incoming materials and composted materials or finished product at the site:
  - a) the total quantity, by volume (cubic yards) and weight (tons), of each load of material received at the site;
  - b) the total quantity, by volume (cubic yards) and weight (tons), of composted material produced;
  - c) the total quantity, by volume (cubic yards) and weight\* (tons), of composted material removed from the site; and
  - d) the total quantity, by volume (cubic yards) and weight (tons), of any unauthorized waste materials separated and removed for disposal elsewhere, and a description of how these materials were disposed of or managed.
- 10. The operator shall submit an annual summary report on the total amount of incoming and outgoing materials for the calendar year. This report shall be submitted to MDEQ on or before February 28<sup>th</sup> of the following calendar year.
- 11. If, at any time, the operator decides to deactivate or close this composting operation, the operator shall notify MDEQ in writing and shall ensure that all materials (unprocessed and composted) are removed from the site and properly disposed or utilized.