



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 HOLLYWOOD DRIVE JACKSON, TENNESSEE 38305-4316
Division of Water Resources
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283

March 20, 2017

Mr. Elmer Yoder
5547 Jones Bend Road
Paris, TN 38242

**Re: Inspection Findings Letter
J&E Finishers – SOPC00002
1570 Briar Patch Lake Road Paris, Henry County, TN**

Dear Mr. Yoder;

I conducted an inspection of your facility on March 16, 2017. This inspection was conducted as a routine inspection. It was a pleasure to meet with you during the inspection. Your cooperation during the inspection was greatly appreciated.

Your facility is currently permitted for 5,200 swine under the SOPC00000 General State Operating Permit. At the time of inspection, you had approximately 4,800 hogs housed on-site. You had a copy of your permit and current Comprehensive Nutrient Management Plan (CNMP) available for review during the inspection. A review of your records indicated you are maintaining all required records including the following: waste storage system inspections, freeboard records, storm water control inspections, daily rainfall, daily waterline inspections, records of compost temperature, records of manure transfers, and signed third party manure transfer agreements from 2008 and 2011. You had a copy of your facility's most recent manure nutrient analysis, which was conducted on April 10, 2016. You have also submitted an Annual Report for 2016.

Rain water is directed away from the production areas of your facility. Gutters are installed on the pit barns and the compost shed to direct rainfall away from the structures. Mortalities are composted on-site in a covered (7) bay compost shed with wooden doors to keep scavengers out. There was an additional larger bay on the west end of the compost shed which is used to store sawdust. Sawdust is used as your carbon source for the compost. No leachate was observed coming from any of the bays during the inspection.

As noted above you only had third party manure transfer agreement forms from 2008 and 2011. During the inspection we discussed how to keep the third party manure transfer agreements. We also talked by phone on 3/20/17 regarding how to keep the third party manure transfer agreements. A daily log of manure transferred should be kept on the manure transfer record form (Appendix C), as you have been doing. Once the total manure transfer for

that event has been completed total the gallons of manure transferred over the days it took to transfer it, and use that number to fill out the third party manure transfer agreement form (Appendix B). You should keep a copy of the third party manure transfer agreement form and the recipient of the manure should get a copy of it. A copy of the most recent manure analysis should also be provided to the third party recipient. I have enclosed a copy of a manure transfer record form (Appendix C) and the third party manure transfer agreement (Appendix B).

I appreciate you taking time from your schedule to meet with me for the CEI. Also enclosed, with this letter, is a copy of the completed Facilities Inspection Report from my visit on March 16, 2017.

If you need assistance or have any questions please contact me at 731-512-1305 or by email at Kevin.X.Smith@tn.gov.

Thank You,

A handwritten signature in blue ink that reads "Kevin Smith". The signature is written in a cursive style and is positioned above a horizontal line.

Kevin Smith, Environmental Scientist 3
TDEC, Division of Water Resources

Enclosures

cc: TDWR-JFO File: J&E Finishers SOPC00002

APPENDIX B

Agreement for the Removal of Litter, Manure and/or Process Wastewater from an AFO

The conditions listed below help to protect water quality. These conditions apply to litter, manure and/or process wastewater removed from an AFO. This agreement is for (amount of waste removed, i.e. tons, gallons, etc.)

_____ of waste, removed on (date) _____, from the facility owned by _____ and located at _____

- A. The litter, manure and/or process wastewater must be managed to ensure there is no discharge of litter, manure and/or process wastewater to surface or groundwater.
- B. When removed from the facility, litter, manure and/or process wastewater should be applied directly to the field or stockpiled and covered with plastic or stored in a building.
- C. Litter, manure and/or process wastewater must not be stockpiled near streams, sinkholes, wetlands or wells.
- D. Fields receiving litter, manure and/or process wastewater should be soil tested at least every two or three years.
- E. A litter, manure and/or process wastewater nutrient analysis should be used to determine application rates for various crops.
- F. Calibrate spreading equipment and apply litter, manure and/or process wastewater uniformly.
- G. Apply no more nitrogen or phosphorus than can be used by the crop.
- H. A buffer zone is recommended between the application sites and adjacent streams, lakes, ponds, sinkholes and wells. The following non-application buffer widths, taken from NRCS Conservation Practice Standard 590, should be used when applicable:

Object, Site	Buffer Width, feet	Situation
Wells	150	Up-slope of application site
	300	Down-slope of application site, if conditions warrant application
Waterbody	30-100	Depending on the amount and quality of vegetation and slope
Public Use Area	300	All
Residences	300	Other than producer

- I. Do not apply litter, manure and/or process wastewater when the ground is frozen, flooded, saturated or on steep slopes subject to flooding, erosion or rapid runoff.
- J. Cover vehicles hauling litter, manure and/or process wastewater on public roads.
- K. Keep records of locations where poultry litter will be used as a fertilizer.

I, _____ am the person receiving litter, manure, and/or process wastewater and do understand the conditions listed above.

_____ (signature)

_____ (date)

_____ (address)

_____ (phone)

APPENDIX C

**Names of Persons and/or Firms that Remove Litter, Manure
and/or Process Wastewater from an AFO**

Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____	Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____
Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____	Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____
Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____	Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____
Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____	Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____
Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____	Name: _____ Address: _____ _____ Phone No.: _____ Tons Removed: _____ Date: _____



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER RESOURCES
 WILLIAM R. SNODGRASS TENNESSEE TOWER
 312 ROSA L. PARKS AVENUE, 11TH FLOOR
 NASHVILLE TN 37243
 1-888-891-8332 (TDEC)

Compliance Inspection for Concentrated Animal Feeding Operation (CAFO)

INSPECTION TYPE				
Routine <input checked="" type="checkbox"/>	Comprehensive <input type="checkbox"/>	Complaint <input type="checkbox"/>	Follow Up <input type="checkbox"/>	Termination <input type="checkbox"/>

Facility Name: J&E Finishers	County(ies): Henry
Street Address or Location: 1570 Briar Patch Lake Road Paris, Henry County, TN	Latitude (dd.dddd): 36.312753
	Longitude (-dd.dddd): -88.427955

Official Contact: Elmer and Jesse Yoder	Email: jesseyod@gmail.com	Contact Phone: 731-336-0049
Address: 3750 Midway Road	City: Cottage Grove	State: TN Zip: 38244

Inspection Date: 3/16/2017	Entry Time: 9:30	Exit Time: 10:30
Weather Conditions: Partly Cloudy, Temps in 30's		Inspector(s): Kevin Smith

PERMIT	
Permit Number: SOPC00002	<input checked="" type="checkbox"/> copy available on site
Issuance Date: 9/03/2015	Expiration Date: 7/31/2020
Number of Animals the Facility is permitted for:	5,200

FACILITY INFORMATION	
Type of Operation: Swine	
Current Number of Animals: 4,800	
Number of Animals in Confinement: 4,800	
Number of Houses/Barns: 2 Barns	
Animals have direct contact with Waters? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, explain:	
	<input type="checkbox"/> Assessed as Impaired? List Impairment(s):

25-year, 24 hour rainfall amount for this location (include source)	6.44 inches, http://hdsc.nws.noaa.gov/hdsc/pfds/
Description of Facility if unpermitted	

Does facility layout match information provided in approved NMP? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No – Attach a sketch or map of current layout.

NUTRIENT MANAGEMENT PLAN (NMP)	
Facility has NMP <input checked="" type="checkbox"/> yes <input type="checkbox"/> no	<input checked="" type="checkbox"/> copy available on site
NMP approved by Tennessee Dept. of Agriculture (NMP approved on: 5/27/2015) <input checked="" type="checkbox"/> yes <input type="checkbox"/> no	

RECORD KEEPING	Yes	No	Partial	Comments
Requirement: Inspections of Waste Storage System	X			
Liquid Systems, Freeboard Records <input type="checkbox"/> N/A – not a liquid system	X			
Weekly Inspection of Storm Water Controls	X			
Records of Daily Rainfall	X			
Records of Daily Waterline Inspections	X			
Records of Compost Temperature and Moisture	X			Had records of compost temperature
Records of Manure Transferred Off Site	X			
Copies of Third Party Waste Transfer Forms			X	Had a signed third party agreement from 2008

			and 2011.
Records of Land Application of Manure			N/A, all manure is exported from facility to Norman Yoder.
Maintenance Reports i.e., equipment calibrations			N/A, no land application occurs at facility. All manure is exported from facility to Norman Yoder.
Annual Manure/Litter Analysis	X		Last manure analysis was done in April of 2016. New manure analysis will need to be done for this year.
Soil Analysis (min. every 5 years)			N/A, no manure is land applied on farm.
Annual Reports Submitted to DWR	X		Submitted 12-27-2016
Required Training for Employees	X		
Emergency Response Plan	X		

MANURE MANAGEMENT (STORAGE)

Manure Storage Structure(s):

- Holding pond/lagoon, select liner type: compacted clay synthetic
 Above-ground constructed structure, describe:
 Under-house structure (i.e. pit barn)
 manure pack house
 composting
 other

Constructed per NRCS Standards (as shown in NMP)? Yes No Unknown

VISUAL INSPECTION OF MANURE MANAGEMENT STRUCTURE(S)

Requirement:	Yes	No	Comments
Structure(s) appears to be properly maintained	X		
Structure(s) appears to be sound (e.g. no rills, holes, etc. noted)	X		
Rain gauge installed and maintained	X		Rain gauge installed on north side of facility.
Structure(s) maintain liquid waste	X		Deep pit barns
Banks are maintained			N/A, structures are deep pit barns
Marker is present to gauge freeboard			N/A, structures are deep pit barns. Producer uses PVC which has marks on it to gauge depth of deep pit barns.
Freeboard	X		Over two feet of freeboard in each pit barn on day of inspection.

Notes/Concerns:

Facility had gutters installed on both pit barns. Rock was also placed around the roof drip line of pit barns. Areas used for vehicular traffic were also rocked.

Do(es) Manure Management Structure(s) match what is described in the NMP? Yes No – Attach a sketch or map of current structures.

MANURE MANAGEMENT (UTILIZATION OF NUTRIENTS)

	Yes	No	N/A	Comments
Manure Transferred Off Site	X			
Facility following manure transfer requirements		X		Producer was keeping up with manure transfers. However, the most recent third party manure transfer agreement form was done in 2011. Producer also had a third party manure transfer agreement form from 2008. The same person has received the manure since 2008. During phone conversation on 3/20/17, asked producer to fill out a manure transfer agreement form for each of the manure transfer events which typical occur during the spring and fall.
Manure is Land Applied on Farm		X		
Facility has Adequate Land for manure/litter application			X	
Facility has a schedule for Land Application and is following the schedule			X	
Facility has appropriate setbacks and buffers			X	

BEST MANAGEMENT PRACTICESIs clean water diverted, as appropriate, from the production area? yes no**Both of the pit barns and compost shed have gutters installed on the roof which carries rain water away from the buildings.****CHEMICAL MANAGEMENT**Are pesticides and/or other contaminants being disposed of in any manure, litter, process wastewater, or stormwater storage or treatment system not specifically designed to treat such chemicals and other contaminants? yes no

Method of Disposal of Chemicals

Producer indicated that chemicals are not stored on-site.**VISUAL INSPECTION OF CHEMICAL STORAGE**Facility is managing chemicals according to the NMP yes no

Notes/Concerns:

Producer indicated that chemicals are not stored on-site.**DISCHARGES**

Has the Facility had a Discharge? no yes

date(s) _____

reported to the Division and/or EPA

description of discharge

perform required sampling?

Description of Actions taken

General Comments:

• All required records were being maintained correctly with the exception of the third party manure transfer agreement form. Producer had a third party transfer agreement from 2008 and 2011. On 3/20/17 talked with producer and requested he fill out a third party manure transfer agreement form for each of the total manure transfer events, which for this operation will likely be twice a year most of the time.

On-Site Contact (if available)

On-Site Contact Name (Print):	On-Site Contact Title:	Signature:	Date:

TDEC Personnel/Information

Inspector's Name (Print): Kevin Smith	Signature: 	Date: 3-16-2017	EFO: Name and Address Jackson Field Office 1625 Hollywood Drive Jackson, TN. 38305
		Time:	



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PHOTOLOG

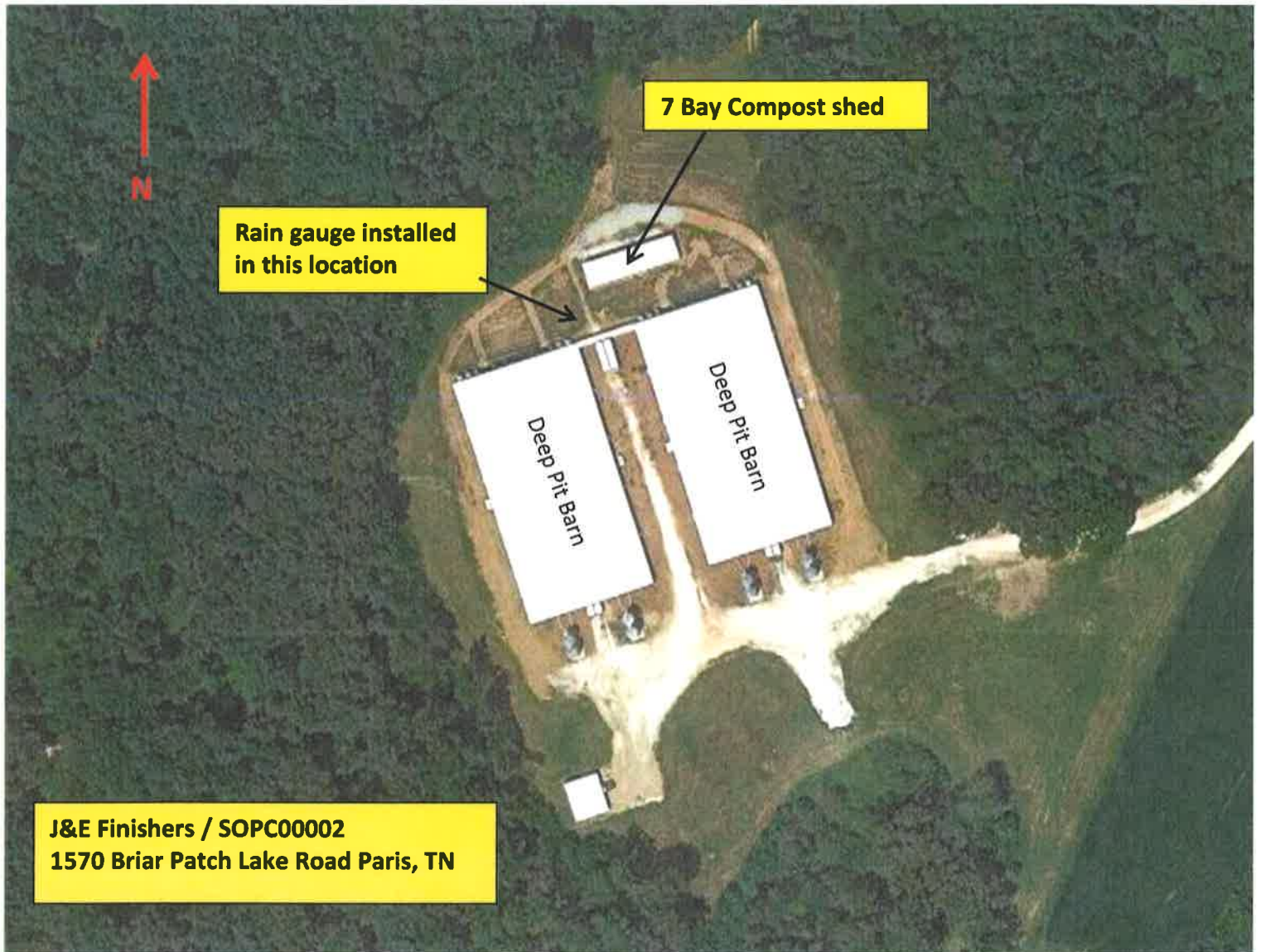
Date: 03/16/17

TO: JFO File: J&E Finishers / SOPC00002

From: Kevin Smith, TDEC-DWR, Jackson Field Office

KRS

Subject: 3-16-17 J&E Finishers Inspection Pictures





Picture 1

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of the deep pit barns located at the J&E Finisher facility. Picture was taken standing on the south side of facility facing north.



Picture 2

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of the deep pit barns located at the J&E Finisher facility. Picture was taken standing on the southwest side of facility facing northeast.



Picture 3

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of western side of the western most pit barn. There are gutters installed on the barns to direct rainfall run-off away from barns. Also note rock which has been placed to stabilize area and also allow for vehicular travel around the pit barn. Picture was taken on southwest side of western most pit barn facing north.



Picture 4

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of area located between the two pit barns. There are gutters installed on the pit barns to direct rainfall run-off away from the pit barns. Also note rock has been placed to stabilize area between barns and also allow for vehicular traffic. Picture was taken on south side of pit barns facing north.



Picture 5

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of eastern side of the eastern most pit barn. There are gutters installed on the barns to direct rainfall run-off away from barns. Also note rock which has been placed to stabilize area and also allow for vehicular travel around the pit barn. Picture was taken on southeast side of eastern most pit barn facing north.



Picture 6

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of the covered 7 bay compost shed located on the northern side of the facility. There is also an additional larger bay to store sawdust material, on the western side of compost shed, which is used as carbon source for the compost. There are wooden doors to close up each bay of the compost shed. There was no leachate observed coming from any of the compost bays on the day of inspection. Picture was taken on north side of compost shed facing south.



Picture 7

Date of Photo: 3/16/2017. Photo taken by: Kevin Smith. Location/Site Name: J&E Finishers / SOPC00002. TDWR personnel Present: Kevin Smith. Remarks: Picture is of rain gauge at the facility. The rain gauge was installed on the northern side of the facility on the day of inspection.