



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

May 9, 2017

Mr. Shannon Rea
1400 Ralston Road
Martin, TN 38237

**Re: Inspection Findings Letter
R&R Farms – Bennett Facility / SOPC00006
779 Ragan Road Dresden, Weakley County, TN**

Dear Mr. Rea;

I conducted an inspection of your facility on May 5, 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 the following required records: waste storage system inspections, freeboard records, daily rainfall, daily waterline inspections, records of compost temperature, and land application records. You had soil analyses for each of your manure application fields conducted within the last 5 years. You had a copy of your facility's most recent manure nutrient analysis, which was conducted on November 14, 2016. You had faxed a copy of your 2016 Annual Report to the Jackson Environmental Field office on 1-31-17. For some reason, I didn't receive the fax but I did take a picture of your copy of the Annual Report during the inspection for our records. Stormwater control inspections were not being documented. You indicated that you have been conducting them but have not filled out the record form. Please begin documenting your stormwater control inspections on the stormwater record form in your record keeping book.

Manure from your facility is land applied to fields covered under your CNMP. You had recently applied manure to the Kilgore East field and indicated you plan on doing more manure applications over the next few days. You provided records of manure applications on a notepad. We discussed transferring the application records on your notepad to your land application record form and weather conditions at time of application record form in your record keeping book. As we discussed, manure application fields should be identified as they are in your CNMP on the manure application record form, so that someone other than you can

identify the application field by looking at the CNMP. I have included a weather condition at time of application record form since the one in your record book was hard to read.

Rain water is directed away from the production areas of your facility. After your deep pit barns were built you had issues with rainwater pooling around them. Several years ago you installed PVC pipes in areas around the pit barns to direct the rainwater away from them. There were some areas observed around the pit barns that could use some additional rock and/or grass to help prevent erosion around your pit barns. Also, the rain gauge installed on the east side of the northern pit barn has been knocked down. You indicated you would have a new rain gauge put up at the facility.

Mortalities are composted on-site in a covered (4) bay compost shed. Sawdust is used as your bulking agent/carbon source for the compost. No uncovered hog remains were observed nor was leachate observed coming from any of the compost bays on the day of inspection.

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 May 5, 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,



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

cc: TDWR-JFO File: R&R Farms – Bennett Facility SOPC00006



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:	R&R Farms– Bennett Facility				County(ies):	Weakley				
Street Address or Location:	779 Ragan Road Dresden, Weakley County, Tennessee				Latitude (dd.ddd):	36.353890				
					Longitude (-dd.ddd):	-88.676740				
Official Contact:	Shannon Rea		Email:				Contact Phone:	731-225-1230		
Address:	1400 Ralston Road		City:	Martin		State:	TN		Zip:	38237
Inspection Date: 5/5/17			Entry Time: 9:30			Exit Time: 14:00				
Weather Conditions: Partly Cloudy, Temps in 50s-60s					Inspector(s): Kevin Smith					
PERMIT										
Permit Number:	SOPC00006			<input checked="" type="checkbox"/> copy available on site						
Issuance Date:	November 9, 2015			Expiration Date :	July 31, 2020					
Number of Animals the Facility is permitted for:	5200 swine									
FACILITY INFORMATION										
Type of Operation:	Swine									
Current Number of Animals:	4,800									
Number of Animals in Confinement:	4,800									
Number of Houses/Barns:	2 Deep Pit Barns / 1 Compost Shed									
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)					6.50 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 checked="" type="checkbox"/> copy available on site							
	<input type="checkbox"/> no									
NMP approved by Tennessee Dept. of Agriculture (NMP approved on: 11/02/2015)						<input checked="" type="checkbox"/> yes <input type="checkbox"/> no				
RECORD KEEPING										
Requirement:	Yes	No	Partial	Comments						
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		Conducts stormwater inspection just not keeping records of them.						
Records of Daily Rainfall	X									
Records of Daily Waterline Inspections	X									
Records of Compost Temperature and Moisture	X			Compost temperature is monitored						
Records of Manure Transferred Off Site				N/A, no manure is transferred off-site						

MANURE MANAGEMENT (UTILIZATION OF NUTRIENTS)

	Yes	No	N/A	Comments
Manure Transferred Off Site		X		
Facility following manure transfer requirements			X	
Manure is Land Applied on Farm	X			
Facility has Adequate Land for manure/litter application	X			532.9 acres for land application
Facility has a schedule for Land Application and is following the schedule	X			
Facility has appropriate setbacks and buffers	X			
- no land application w/in 100 ft. of water features or has a 35 ft. vegetated buffer or a 60 ft. natural riparian buffer	X			
- no land application w/in 100 ft. of potable well	X			
- 60 ft. natural riparian buffer btw. Stream and land application areas for new CAFO adjacent to exceptional TN waters and ONRW			X	

Description of Land Application System if it differs from what is listed in NMP:

N/A, does not differ. Mr. Rea applies manure to fields in his approved CNMP. Mr. Rea applies manure with an injector which places the manure roughly 6 inches into ground.

VISUAL INSPECTION OF LAND APPLICATION AREAS

Field	Crop Growing	BMPs/Buffers	Notes
BENNETT	NOT PLANTED YET, WILL BE CORN		125.9
BOAZ	NOT PLANTED YET, WILL BE SOYBEANS		51.9
BOAZ 2	NOT PLANTED YET, WILL BE CORN		13.6
FULL ROAD	NOT PLANTED YET, WILL BE CORN		36.7
LEE ROAD	NOT PLANTED YET, WILL BE CORN		37.0
PRITCHET	NOT PLANTED YET, WILL BE SOYBEANS		36.4
REAGAN WES	NOT PLANTED YET WILL BE SOYBEANS		16.9
STEVE REA	50 ACRES IN WHEAT, WHOLE FIELD WILL BE SOYBEANS		121.8
WINSTON	NOT PLANTED YET, WILL BE CORN		32.0
KILGOR E	NOT PLANTED YET, WILL BE CORN	APPLIED TO ON 5/3/17. BUFFERS OBSERVED	23.2
KILGOR NW	WHEAT, WILL BE IN SOYBEANS		37.5
			TOTAL SPREADABLE ACRES 532.9

Do Application Areas match information provided in NMP? Yes No – Attach a sketch or map of current application areas.

MORTALITY MANAGEMENT

Are mortalities managed so that discharges of pollutants to surface waters are avoided? yes no

Are mortalities managed so that they are not disposed of in manure, stormwater, or process wastewater storage or treatment systems that are not designed to treat animal mortalities? yes no

VISUAL INSPECTION OF MORTALITY SITE

Mortality Management On Site

- burial
- Class I landfill
- incineration
- rendering
- composting
- Other, explain

Facility is Managing Mortality According to the NMP yes no

Concerns:

Mortalities are disposed of in a covered (4) bay compost shed. Sawdust is used as the carbon source/bulking agent. There were no obnoxious odors or excessive flies observed on day of inspection. There was no leachate observed coming from any of the bays on the day of inspection. No uncovered hog remains were observed on the day of inspection.

BEST MANAGEMENT PRACTICES

Is clean water diverted, as appropriate, from the production area? yes no

Grade work was not done right when Mr. Rea's barns were built which resulted in water pooling around the barns in areas. Mr. Rea installed some PVC pipes several years ago to alleviate this problem. The PVC pipes help carry rainwater away from the barns. The PVC pipes carrying the rainwater drain to an application field that Mr. Rea owns. There were areas around the barns that could use either some additional rock and/or grass to stabilize them and keep erosion from occurring.

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

Mr. Rea has a sharps container to dispose of needles.

VISUAL INSPECTION OF CHEMICAL STORAGE

Facility is managing chemicals according to the NMP yes no

Concerns:

Mr. Rea indicated no chemicals are kept at deep pit barns.

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:

- Facility needs to begin keeping records of stormwater inspections.
- Land application records on notepad should be transferred to manure application record form and weather conditions at time of manure application record form in record keeping book so that they are easily accessible if needed. Manure application fields should be identified as they are in CNMP on manure application record forms in case someone other than producer needs to know how much manure was applied and to which field it was applied.
- Facility needs to put rain gauge back up. Facility did have one on the east side of the northern deep pit barn but it had been knocked down.
- There are areas around the deep pit barns that could use either some additional rock and/or grass to stabilize them and keep erosion from occurring.

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: 5/5/17	EFO: Name and Address Jackson Field Office 1625 Hollywood Drive Jackson, TN. 38305
		Time:	



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PHOTOLOG

Date: 05/05/17

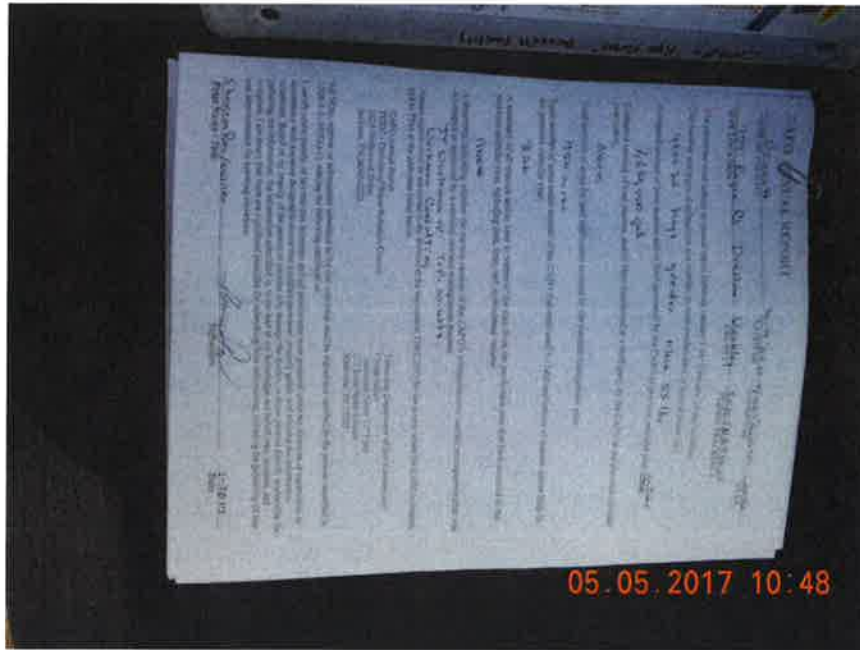
TO: JFO File: R&R Farms – Bennett Facility / SOPC00006

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

KRS

Subject: 5-05-17 R&R Farms – Bennett Facility Inspection Pictures





Picture 1

Date of Photo: 5/05/2017. Photo taken by: Kevin Smith. Location/Site Name: R&R Farms – Bennett Facility / SOPC00006. TDWR personnel Present: Kevin Smith. Remarks: Picture is of 2016 Annual Report. Mr. Rea had faxed the Annual Report to the Jackson Environmental Office on 1/31/17. Mr. Rea had a copy of the fax transmittal. I did not receive the copy though do not know where it ended up. I put a copy of Annual Report in file.



Picture 2

Date of Photo: 5/05/2017. Photo taken by: Kevin Smith. Location/Site Name: R&R Farms – Bennett Facility / SOPC00006. TDWR personnel Present: Kevin Smith. Remarks: Picture is of southernmost pit barn at the R&R – Bennett facility. There were some areas around barn which could use some additional rock and/or vegetation to prevent erosion from occurring.



Picture 3

Date of Photo: 5/05/2017. Photo taken by: Kevin Smith. Location/Site Name: R&R Farms – Bennett Facility / SOPC00006. TDWR personnel Present: Kevin Smith. Remarks: Picture is of northernmost pit barn at the R&R – Bennett facility. There were some areas around barn which could use some additional rock and/or vegetation to prevent erosion from occurring.



Picture 4

Date of Photo: 5/05/2017. Photo taken by: Kevin Smith. Location/Site Name: R&R Farms – Bennett Facility / SOPC00006. TDWR personnel Present: Kevin Smith. Remarks: Picture is of covered (4) bay compost shed. There was no leachate or uncovered hog remains observed on the day of inspection. Picture was taken on west side of compost shed facing east.