

# 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 stomwater 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 Comprehensive	Comp	laint		Follow Up	☐   Term	ination		
Facility Name: R&R Farms-Bennett Facility County(ies): Weakley								
Street Address or Location: 779 Ragan Road Dresdo	Latitude (dd.dddd): Longitude (-dd.dddd):	(dd.dddd): 36.353890 Longitude 28.676740						
Official Contact: Shannon Rea	Email:				Contact Phone:	Contact Phone: 731-225-1230		
Address: 1400 Ralston Road	City: Martin				State: TN	Zip: 38237		
Inspection Date: 5/5/17 Ent	try Time: 9:30 Exit				t Time: 14:00	**************************************		
Weather Conditions: Partly Cloudy, Temps		T	Inspecto	r(s): Kevin Smi				
PERMIT								
Permit Number: SOPC00006	X	copy	availab	le on site				
Issuance Date: November 9, 2015			on Date :		ly 31, 2020			
Number of Animals the Facility is permitted		00 swi			*			
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 (	Comp	ost Shed	l				
Animals have direct contact with Waters?	⊠ No □							
☐ 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? ✓ Yes ☐ No − Attach a sketch or map of current layout.								
NUTRIENT MANAGEMENT PLAN (NMP)								
Facility has NMP  yes  copy available on site  no								
NMP approved by Tennessee Dept. of Agriculture (NMP approved on:11/02/2015) yes no								
RECORD KEEPING								
Requirement:	Yes	No	Partial		Comments			
Inspections of Waste Storage System	X							
Liquid Systems, Freeboard Records  ☐ 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 Moistu	ire X				rature is monitored			
Records of Manure Transferred Off Site N/A, no manure is transferred off-site					site			

Copies of Third Party Waste Transfer Forms			N/A, no manure is transferred off-site				
Records of Land Application of Manure	X		Had records of land applications on notepad kept in tractor. Asked Mr. Rea to transfer those				
			records to the manure application record form				
			and the weather conditions at time of application record form in his record keeping book. Asked				
			Mr. Rea to identify fields as they are identified in				
			CNMP on his record forms. Last application				
			was 5/3/17. Going to be applying manure first of				
D. C.	77		next week prior to planting corn crop.				
Maintenance Reports	X		Mr. Rea applies to a 1 acre area and sees how much manure is applied to make sure the correct				
i.e., equipment calibrations			amount is being applied per acre.				
Annual Manure/Litter Analysis	X	_	Last manure analysis conducted 11/14/16				
Soil Analysis (min. every 5 years)	X		CNMP has soil analyses for all manure application fields within the last 5 years. Mr. Rea also had more recent soil analysis conducted within the last year available for review during the inspection.				
Annual Reports Submitted to DWR	X		Mr. Rea had a fax report where he had faxed				
			Annual Report in to our office on 1/31/17. I did not				
			receive the Annual Report but I did take a picture of it during my inspection to put a copy in file.				
Required Training for Employees	X	$\vdash$	of it during my inspection to put a copy in me.				
Emergency Response Plan	X		Page 13 of CNMP				
MANURE MANAGEMENT (STORAGE)							
Manure Storage Structure(s):							
Holding pond/lagoon, select liner type:	1		compacted clay synthetic				
Above-ground constructed structure, descri	ribe:						
Under-house structure (i.e. pit barn)							
manure pack house							
composting							
other	0.000	<b>E</b> 7					
Constructed per NRCS Standards (as shown in N			Yes  Unknown				
VISUAL INSPECTION OF MANURE MANAGEMEN		~					
Requirement:	Yes	No	Comments				
Structure(s) appears to be properly maintained Structure(s) appears to be sound (e.g. no rills,	X	-					
holes, etc. noted)	A						
Rain gauge installed and maintained		X	Rain gauge was installed on east side of the northernmost				
Ram gauge instance and maintained		A	deep pit barn. It has been knocked down. Mr. Rea plans to install a new one.				
Structure(s) maintain liquid waste	X	. Variation of					
Banks are maintained			N/A, Facility has two deep pit barns				
Marker is present to gauge freeboard			N/A, Facility has two deep pit barns. Mr. Rea uses a piece of PVC to gauge depth of pits.				
Freeboard	X		Mr. Rea had over 3 feet of freeboard in 1 barn and				
	between 6 inches and 1 foot of freeboard in the other						
9	barn. Mr. Rea is going to apply manure from the barn with only 6 inches to 1 foot of freeboard in the next couple						
	of days.						
Notes/Concerns		•	*				
			Rea has access to a backhoe and track hoe if he ever where				
			a's barns where 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.							
Do(es) Manure Management Structure(s) match of current structures.	what is	descr	ibed in the NMP? ✓ Yes ☐ No – Attach a sketch or map				

MANURE MANAC	GEMENT (UTILIZATI)			-	ENTS)		
		Yes		N/A	Comments		
Manure Transferred O			X				
Facility following manure transfer requirements				X			
Manure is Land Applied on Farm		X					
Facility has Adequate Land for manure/litter		X			532.9 acres for land	application	
application							
	for Land Application and	X					
is following the schedu							
Facility has appropriate setbacks and buffers		X					
	w/in 100 ft. of water	X					
	of ft. vegetated buffer or a						
60 ft. natural riparian buffer							
	w/in 100 ft. of potable	X					
well	1 60 1 0					4-44	
	an buffer btw. Stream and			X			
land application ar							
	onal TN waters and						
ONRW	1' 4' 5' 4' '6' 1'66		$\Box$		. 1' ND 60		
Description of Land A	pplication System if it diffe	ers from	n wh	at is lis	ited in NMP:		
NT/A 1 4 1000	B.F. Th. 14				1.000.00		
N/A, does not differ.	Mr. Kea applies manure t	o field	is in t	nis app	roved CNMP. Mr.	. Rea applies manure with an	
injector which places	the manure roughly 6 inc	nes in	to gro	ouna.			
VICUAL INCRECTION O	F LAND APPLICATION AR	EAC					
Field	Crop Growing	BMP	a/Duf	Fora		Notes	
BENNETT	NOT PLANTED YET,	DIVIE	S/Dui	1618		125.9	
DENNETT	WILL BE CORN					125.9	
Boaz						51.9	
DUAL	NOT PLANTED YET, WILL BE SOYBEANS					51.9	
BOAZ 2	NOT PLANTED YET,					13.6	
BOAL 2	WILL BE CORN					13.0	
FULL ROAD	NOT PLANTED YET,			-		36.7	
TOLL ROLL	WILL BE CORN					30.7	
LEE ROAD	NOT PLANTED YET,					37.0	
222110112	WILL BE CORN					37.0	
PRITCHET	NOT PLANTED YET,					36.4	
	WILL BE SOYBEANS					30.4	
REAGAN WES	NOT PLANTED YET					16.9	
	WILL BE SOYBEANS					1012	
STEVE REA	50 ACRES IN					121.8	
	WHEAT, WHOLE						
	FIELD WILL BE						
	SOYBEANS						
WINSTON	NOT PLANTED YET,					32.0	
	WILL BE CORN						
KILGOR E	NOT PLANTED YET,	APPLIED TO ON 5/3/17. BUFFERS		5/3/17. <b>BUFFERS</b>	23.2		
	WILL BE CORN	OBSERVED					
KILGOR NW	WHEAT, WILL BE IN					37.5	
	SOYBEANS			_			
						TOTAL SPREADABLE	
						ACRES 532.9	
Do Application Areas napplication areas.	natch information provided	in NM	1P? ∑	<b>∀</b> Yes	□ No – Attach a sk	etch or map of current	

MORTALITY MANAGEMENT  Are mortalities managed so that discharges of pollutants to surface waters are avoided?   ✓ yes   no						
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						
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 where 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.						
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to stabilize them and keep erosion from occurring.  CHEMICAL MANAGEMENT						
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#### **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	EFO: Name and Address									
Inspector's Name (Print):  Kevin Smith	Signature:	Date: 5/5/17	Jackson Field Office 1625 Hollywood Drive							
Acom Smith	Muc Sunt	Time:	Jackson, TN. 38	3305						



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

#### **PHOTOLOG**

Date: 05/05/17

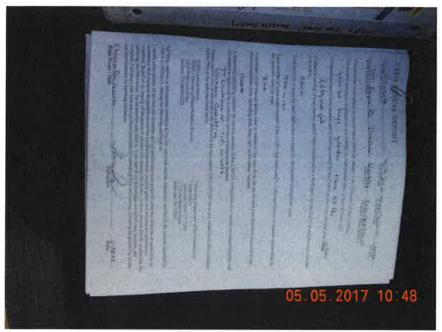
TO: JFO File: R&R Farms - Bennett Facility / SOPC00006

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

KK>

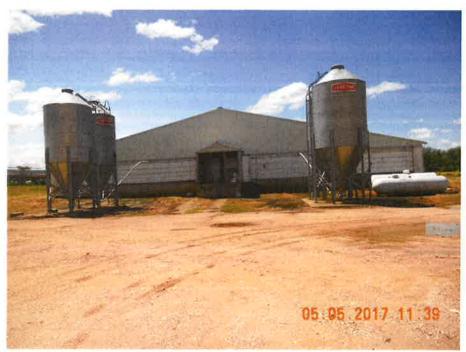
Subject: 5-05-17 R&R Farms – Bennett Facility Inspection Pictures





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.