



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

October 16, 2015

Mr. Dennis Yoder  
6025 Briarpatch LK Road  
Paris, TN 38242

**Re: Compliance Evaluation Inspection October 8, 2015  
Dennis Yoder State Operating Permit SOPC00283  
6025 Briarpatch LK Road, Henry County, TN**

Dear Mr. Yoder;

I conducted a Compliance Evaluation Inspection (CEI) of the Dennis Yoder facility on October 8, 2015. Mr. Danny Ham with Tosh Pork was also present for the inspection. At the time of my inspection, you indicated you were in the process of load out and there were approximately 3,755 hogs housed on-site. Your records of waste storage system inspections, freeboard records, daily rainfall, and daily waterline inspections were complete. You were not maintaining weekly stormwater control inspections; however, since your facility still has Stormwater Construction permit coverage Mr. Ham has been conducting stormwater inspections twice a week at your facility. Once you terminate your Construction Stormwater permit coverage, Mr. Ham will no longer conduct stormwater inspections twice a week at your facility. You should begin conducting your own weekly stormwater inspections, so when Mr. Ham is no longer doing them you will be familiar with how to conduct them and what to look for.

On the day of my inspection, you did not have a copy of your Comprehensive Nutrient Management Plan (CNMP) on-site for review. Please keep a copy of your CNMP with your permit on-site for review. We also discussed the Annual Report and I provided you with an Annual Report template. You did not have any swine on-site until the end of May 2015, so an Annual Report for 2014 is not required. Please send in an Annual Report each year between January 1 and February 15, for the preceding year, as it is a condition of your permit coverage.

Since you did not have any hogs on-site until the end of May 2015, you have not yet needed to pump out your pit barns. I explained to you the record keeping requirements for third party manure transfers. I also provided you with a third party manure transfer form and the manure transfer record form, which are both located in your CNMP. When you do pump your pit barns out and transfer manure both of these forms should be used to maintain manure transfer records from your facility and be kept with the rest of your records. The recipient of the manure should receive a copy of the third party manure transfer form and you should also keep a copy for your records. A copy of the most recent manure analysis should also be provided to the recipient of the manure. You should maintain a copy of all manure analyses with your records. A manure analysis has not been done yet since the pit barns have not been pumped out.

Your facility still has Construction Stormwater permit coverage. There were a few areas of unstable soil noted on the day of my inspection. You have stormwater control measures in place and you indicated you were planning to rock the remaining unstable areas in the near future. Before you can terminate your Construction Stormwater permit coverage these areas will need to be stabilized. Once you have stabilized the site, please contact TDEC to terminate your Construction Stormwater permit coverage.

Mortalities are currently being composted on the ground in windrows. Sawdust is used as a carbon source. Your CNMP indicated you would build a compost shed; however, you indicated you were probably going to install an Ecodrum instead. If you do use an Ecodrum you will need to make sure you have your CNMP updated to reflect this. I did not observe any contaminated run-off leaving the compost area on the day of my inspection; however there was a small amount of leachate observed coming from both the northern and southern compost piles. You should watch for leachate and add sawdust as needed to keep leachate from running off. A few hog remains were observed sticking out from the compost piles. You indicated this occurs as the compost piles settle and materials break down. Additional sawdust should be added, as needed, to make sure adequate cover remains over the hog remains. The compost area was located very close to your water well. The compost piles should be moved to a relatively flat area that is a minimum of 200 feet away from your water well. I spoke with you on 10-15-15 and you indicated you would have the compost piles moved by Saturday, 10-17-15. Please notify me when you have moved the compost piles and provide pictures of the new compost location, as well as the former compost location after you have moved the compost piles. You may email the pictures to [kevin.x.smith@tn.gov](mailto:kevin.x.smith@tn.gov).

If you need assistance in the future with managing your compost or in selecting appropriate best management practices (BMPs) for your facility, on-site technical assistance may be available from your local USDA-NRCS office or UT Extension office. Below is local contact information for both of these agencies:

- USDA-NRCS Office – 408 North Market Street Paris, TN 38242, Phone: 731-642-0761 Ext. 3
- UT Extension Office – 1120 Tyson Avenue Paris, TN 38242, Phone: 731-642-2941

I appreciate you and Mr. Ham taking time from your schedules 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 October 8, 2015.

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

Thank You,

A handwritten signature in blue ink, appearing to read "Kevin Smith", is written over a horizontal line.

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

cc: TDWR-JFO File: Dennis Yoder SOPC00283



TDEC - Division of Water Resources  
Jackson Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	SOPC00283	Facility Site Name	Dennis Yoder		
		Address	6025 Briarpatch LK Road Paris, TN 38242		
Permit Eff. Date:	Sep 2, 2015	Permit Exp Date:	Sep 30, 2019	SIC Code:	0213 hogs

Compliance Monitoring Information

Compliance Monitoring Activity Name	CAFO Non-Sampling				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	10/08/2015 13:05	Exit Date/Time (mm/dd/yyyy hh:mm):	10/08/2015 14:10
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Facility Representatives

Dennis Yoder, Owner/Operator, 731-336-4131	Dennis Yoder, Owner/Operator, 731-336-4131
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Concentrated Animal Feed Operations (CAFO)		

Compliance Monitoring Reason: Core Program

Compliance Monitoring Agency Type: State Agency Name: TDEC - DWR

Did EPA assist/ Inspection? No Time Physically conducting activity: Days: 1 Hours:

Inspection Type: State Compliance Monitoring Action Outcome:

Lead Agency: State Compliance Monitoring Rating Code: Unrated

If Joint Inspection, what was the purpose of the other party?

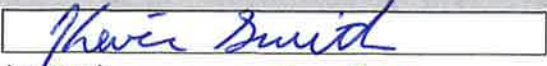

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input checked="" type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water
<input type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

See attached TDEC Inspection Letter.

EPA and State Representatives

	TDEC-DWR / Jackson Field Office / 731-512-1305	Oct 8, 2015
Inspector's Signature	Agency / Office / Phone	Date
	TDEC-DWR / Jackson Field Office / 731-512-1300	Oct 8, 2015 ✓
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)



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)**

<b>INSPECTION TYPE</b>									
Routine	<input type="checkbox"/>	Comprehensive	<input checked="" type="checkbox"/>	Complaint	<input type="checkbox"/>	Follow Up	<input type="checkbox"/>	Termination	<input type="checkbox"/>
<b>Facility Name:</b> Dennis Yoder					<b>County(ies):</b> Henry				
<b>Street Address or Location:</b> 6025 Briarpatch LK Road Paris, TN 38242					<b>Latitude (dd.dddd):</b> 36.297900				
					<b>Longitude (-dd.dddd):</b> -88.490000				
<b>Official Contact:</b> Dennis Yoder			<b>Email:</b> <a href="mailto:denyoder@gmail.com">denyoder@gmail.com</a>			<b>Contact Phone:</b> 731-336-4131			
<b>Address:</b> 1800 Briarpatch LK Road			<b>City:</b> Paris			<b>State:</b> TN		<b>Zip:</b> 38242	
<b>Inspection Date:</b> 10/08/2015		<b>Entry Time:</b> 13:00			<b>Exit Time:</b> 14:10				
<b>Weather Conditions:</b> Partly Cloudy, Temps in mid-80's				<b>Inspector(s):</b> Kevin Smith					
<b>PERMIT</b>									
<b>Permit Number:</b> SOPC00283		<input checked="" type="checkbox"/> copy available on site							
<b>Issuance Date:</b> 9-2-2015		<b>Expiration Date:</b> 9-30-2019							
<b>Number of Animals the Facility is permitted for</b>		<b>4,960</b>							
<b>FACILITY INFORMATION</b>									
<b>Type of Operation:</b>		<b>Swine</b>							
<b>Current Number of Animals:</b>		<b>3,755 (In process of load out)</b>							
<b>Number of Animals in Confinement:</b>		<b>3,755</b>							
<b>Number of Houses/Barns:</b>		<b>2 barns</b>							
<b>Animals have direct contact with Waters?</b>		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, explain:							
<div style="text-align: center;"><input type="checkbox"/> Assessed as Impaired? List Impairment(s):</div>									
<b>25-year, 24 hour rainfall amount for this location (include source)</b>					<b>6.46 inches, <a href="http://hdsc.nws.noaa.gov/hdsc/pfds/">http://hdsc.nws.noaa.gov/hdsc/pfds/</a></b>				
<b>Description of Facility if unpermitted</b>									
Does facility layout match information provided in approved NMP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No – Attach a sketch or map of current layout. (Facility layout matches information provided in approved CNMP except compost shed has not been built as indicated in CNMP. Mr. Yoder indicated he plans to install an Ecodrum instead of building a compost shed. Advised Mr. Yoder to have this updated in his CNMP.)									
<b>NUTRIENT MANAGEMENT PLAN (NMP)</b>									
<b>Facility has NMP</b>		<input checked="" type="checkbox"/> yes <input type="checkbox"/> copy available on site							
		<input checked="" type="checkbox"/> no (Mr. Yoder indicated it was at his house and he could run and get it. Advised Mr. Yoder to keep a copy with his permit on-site.)							
<b>NMP approved by Tennessee Dept. of Agriculture (NMP approved on: April 28, 2014)</b>						<input checked="" type="checkbox"/> yes <input type="checkbox"/> no			
<b>RECORD KEEPING</b>									
<b>Requirement:</b>		<b>Yes</b>	<b>No</b>	<b>Partial</b>	<b>Comments</b>				
Inspections of Waste Storage System		X							
Liquid Systems, Freeboard Records		X							
<input type="checkbox"/> N/A – not a liquid system									
Weekly Inspection of Storm Water Controls		X			Mr. Danny Ham with Tosh Farms has been conducting bi-weekly stormwater inspections. Mr. Yoder will begin conducting storm water control inspections and keeping records of them in his record book.				



Records of Daily Rainfall	X			
Records of Daily Waterline Inspections	X			
Records of Compost Temperature and Moisture			X	Mr. Yoder was checking compost temperature
Records of Manure Transferred Off Site				N/A Producer has not yet transferred manure. First hogs on-site May 2015. TDEC explained transfer requirements and provided producer with forms.
Copies of Third Party Waste Transfer Forms				N/A Producer has not yet transferred manure. First hogs on-site May 2015. TDEC explained transfer requirements and provided producer with forms.
Records of Land Application of Manure				N/A Producer indicates manure will be exported to 3 <sup>rd</sup> party
Maintenance Reports i.e., equipment calibrations				N/A Producer indicates manure will be exported to 3 <sup>rd</sup> party
Annual Manure/Litter Analysis				N/A First hogs on-site in May 2015 / have not yet had to pump out pit barns so manure analysis has not been collected
Soil Analysis (min. every 5 years)				N/A Producer indicates no land application will occur at the facility. All manure will be exported to 3 <sup>rd</sup> party.
Annual Reports Submitted to DWR				N/A Producer did not have hogs until May of 2015, first annual report will be submitted for 2015. TDEC provided producer with Annual Report template.
Required Training for Employees	X			
Emergency Response Plan	X			Page 17 of CNMP. Producer indicated Emergency Response Plan is posted in Control Room as well.

#### 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		Located on east side of facility
Structure(s) maintain liquid waste	X		Underground pit barn
Banks are maintained			N/A underground pit barn
Marker is present to gauge freeboard	X		Producer uses PVC pipe with measurements to gauge depth of manure in pits.
Freeboard	X		

Notes/Concerns:

Producer's barns have biofilter boxes on the pit exhaust fans to improve air quality by reducing the amount of odor emitted by the pit exhaust fans. Mr. Danny Ham with Tosh Pork indicated this facility is the first Tosh built facility which has these biofilter boxes. Mr. Ham indicated Tosh plans to put these biofilter boxes on all future pit barns built by Tosh. These biofilter boxes contain mulch and are kept moist using a sprinkler system to apply water. On the day of my inspection there was water noted around the biofilter boxes.

TDEC was first unsure if this water was leachate from the biofilter boxes or overspray from the sprinkler system used to keep mulch moist. After returning to the office and researching biofilters it seems unlikely that there would be a substantial amount of leachate coming from the biofilter boxes, unless there was a heavy rainfall event or malfunction of the watering system used to keep the biofilter media moist. TDEC contacted Mr. Dennis Yoder, the producer for the facility, on 10-15-15 and discussed the biofilter boxes. Mr. Yoder indicated that the water on the ground around the biofilter boxes was from overspray from the sprinklers used to keep the mulch moist. Mr. Yoder indicated he has not observed any leachate coming

**Mr. Yoder was not sure if he has a sample spill kit on-site. He was going to check to see if he has one in his Control Room. Mr. Danny Ham with Tosh Farms thought Mr. Yoder should have one, as Tosh generally gives these to producers as a part of a startup kit. Mr. Yoder was going to check and see if he has one. If he doesn't have one he is going to contact Tosh Farms to get one.**

## MANURE MANAGEMENT (UTILIZATION OF NUTRIENTS)

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

## VISUAL INSPECTION OF LAND APPLICATION AREAS

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

**Producer will not land apply. Producer will export all manure to a 3<sup>rd</sup> party.**

## MORTALITY MANAGEMENT

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

(TDEC observed no discharges to surface waters on day of inspection; however composting is being conducted on the ground in windrows. There is no compost structure with a roof at facility. See additional comments in Notes/Concerns section below.)

Talked with producer on 10-15-15 and he indicated he planned to move compost piles around to the front of the barns in a field. Producer indicated this would be done by Saturday 10-17-15. Producer indicated this area was fairly level and should not receive rainfall runoff from other areas. This location will be over 500 feet from well location.

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 (See Notes Below)

### Notes/Concerns:

Producer is currently composting on the ground in windrows. Producer's CNMP indicated he would build compost shed to handle mortalities at the facility. On the day of inspection producer indicated he plans to install an Ecodrum to compost mortalities in. Producer indicated that composting on the ground in windrows is only a temporary means of handling mortalities until he has the Ecodrum installed at the facility. Producer has been talking with NRCS in regards to building a compost shed verses using an Ecodrum to dispose of mortalities. TDEC did not observe any contaminated run-off leaving the compost area on the day of inspection; however there was a small amount of leachate observed coming from both the northern and southern windrows. TDEC indicated to producer he should watch for leachate and add additional sawdust as needed to keep leachate from running off.

TDEC had a few concerns with the current compost location.

- Current compost location is located less than 30 feet from well.
- The compost windrows were located on a slight slope and rainwater is not being diverted around the windrows.
- There is no means to collect contaminated run-off and since the windrows are on a slope it would appear likely that during rainfall events there is contaminated run-off from the windrows.

Producer indicated he could move the compost windrows if he needed to.

Talked with producer on 10-15-15 and he indicated he planned to move compost piles around to the front of the barns in a field. Producer indicated this would be done by Saturday 10-17-15. Producer indicated this area was fairly level and should not receive rainfall runoff from other areas. This location will be over 500 feet from well location.

## BEST MANAGEMENT PRACTICES

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

(Clean water is diverted away from all production areas except for the current compost location.)

Talked with producer on 10-15-15 and he indicated he planned to move compost piles around to the front of the barns in a field. Producer indicated this would be done by Saturday 10-17-15. Producer indicated this area was fairly level and should not receive rainfall runoff from other areas. This location will be over 500 feet from well location.

## 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

**VISUAL INSPECTION OF CHEMICAL STORAGE**

Facility is managing chemicals according to the NMP ☒ yes ☐ no

Concerns

Any chemicals stored on-site are kept in Control Room. Producer has a sharps container which he uses to dispose of sharps.

**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:**


- Producer needs to maintain a copy of his CNMP on-site with his permit.
- Producer needs to begin conducting stormwater control inspection and maintaining records.
- Producer has not yet transferred manure because he did not receive any hogs until May 2015. TDEC went over manure transfer requirements with producer and provided record keeping forms for manure transfer.
- Producer has not yet submitted an Annual Report for facility because he did not receive hogs until May of 2015. Producer's first Annual Report submission will be for 2015. TDEC provided producer with Annual Report template and went over Annual Report submittal details.
- There were areas of unstable soil around the facility. Producer still has Stormwater Construction permit coverage and still has erosion control measures in place. Producer plans to rock unstable areas in the near future.
- Producer is currently composting mortalities on the ground in windrows as a temporary means of handling his mortalities. Producer's CNMP indicated he would build a compost shed to handle his mortalities. Producer has been talking with NRCS about doing a cost share on building a compost shed or buying an Ecodrum to compost mortalities in. Producer indicated on day of inspection he believed he was going to install an Ecodrum. TDEC indicated to producer he would need to update his CNMP to show that he is using an Ecodrum to compost in and not a compost shed.
- Producer's current location of compost is less than 30 feet from his well. The current location of the compost windrows is on a slope and rainwater is not diverted around the windrows. TDEC did not observe any contaminated run-off leaving the compost area on the day of inspection; however there was a small amount of leachate observed coming from both the northern and southern windrows. Given the windrows are located on a slope and rainwater is not diverted away from the compost area, it would seem likely that during rainfall events contaminated run-off would become a problem.

Talked with producer on 10-15-15 and he indicated he planned to move compost piles around to the front of the barns in a field. Producer indicated this would be done by Saturday 10-17-15. Producer indicated this area was fairly level and should not receive rainfall runoff from other areas. This location will be over 500 feet from well location.

**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: 10-15-15 Time:	EFO: Name and Address Jackson Field Office 1625 Hollywood Drive Jackson, TN. 38305
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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: 10/12/15**

**TO: JFO File: Dennis Yoder Facility / SOPC00283**

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

**Subject: 10-8-15 Pictures from Dennis Yoder Facility Inspection**



**Picture 1**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of northern pit barn. Picture was taken on west side of northern pit barn facing east.**



**Picture 2**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of southern pit barn. Picture was taken on west side of southern pit barn facing east.**



**Picture 3**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of biofilter boxes used to improve air quality by reducing odor emitted from the pit exhaust fans. Picture was taken on western side of pit barns facing east.**



Picture 4

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of biofilter box used to improve air quality by reducing odor emitted from pit exhaust fans. Biofilter boxes are filled with mulch and water is sprayed on mulch by a sprinkler. Picture was taken on western side of pit barns facing northeast.



Picture 5

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of biofilter boxes used to improve air quality by reducing odor emitted from the pit exhaust fans. Producer indicated water in picture is freshwater from the sprinkler on the biofilter boxes. It is not leachate from the biofilter boxes. Picture was taken standing on south side of pit barns facing east.





**Picture 6**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Producer still has Stormwater Construction Permit coverage. Picture is of silt fence installed on southern portion of facility. There were three rows of silt fence on the southern slope of the facility. The ground down-gradient of the top silt fence appeared to be stabilized on the day of my visit. Picture was taken standing on southeastern portion of facility facing southwest/west.**



**Picture 7**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of unstable ground located up-gradient of top silt fence located along southern portion of facility. Producer indicated he plans to rock this area down to top silt fence. Picture was taken standing on southeastern portion of facility facing west.**





**Picture 8**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of eastern portion of facility. There are areas of unstable ground on this portion of the facility. Producer has silt fence installed down-gradient of this area and intends to rock this area down to silt fence. Picture was taken at southeast corner of facility facing north.**



**Picture 9**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of eastern portion of facility. There are areas of unstable ground on this portion of the facility. Producer has silt fence installed down-gradient of this area and intends to rock this area down to silt fence. Picture was taken standing on east side of facility facing south.**



Picture 10

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of gullies formed on eastern portion of facility. Producer indicated he has been talking with NRCS about placing gutters around the facility. Producer intends to rock this area in the near future. Silt fenced is installed down-gradient of this area. Picture was taken standing on east side of facility facing west.



Picture 11

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of producer's current compost location. Producer is composting on top of ground in windrows. Producer indicated this is temporary and plans to install an Ecodrum at his facility for composting in the near future. This area is on a slight slope which slopes to the east/northeast. Note well in background. Picture was taken standing near northeast corner of hog barn facing east.





Picture 12

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of northern compost windrow. Picture was taken standing near northeast corner of hog barn facing east.



Picture 13

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of a small amount of leachate observed coming from northeast corner of northern windrow pile. Indicated to producer needed to watch for leachate and add sawdust to keep leachate from running off. Picture was taken standing on northeast side of northern compost windrow facing south.





Picture 14

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture was taken standing at northeast corner of northern compost windrow, where leachate was observed in Picture 13, facing northeast in the direction leachate would run off to.



Picture 15

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of southern compost windrow. Note well in background of picture. Picture was taken standing near northeast corner of hog barn facing east.





Picture 16

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of small amount of leachate observed coming from northeast corner of southern compost windrow. Indicated to producer needed to watch for leachate and add sawdust to keep leachate from running off. Picture was taken standing on northeast side of southern compost windrow facing south/southwest.



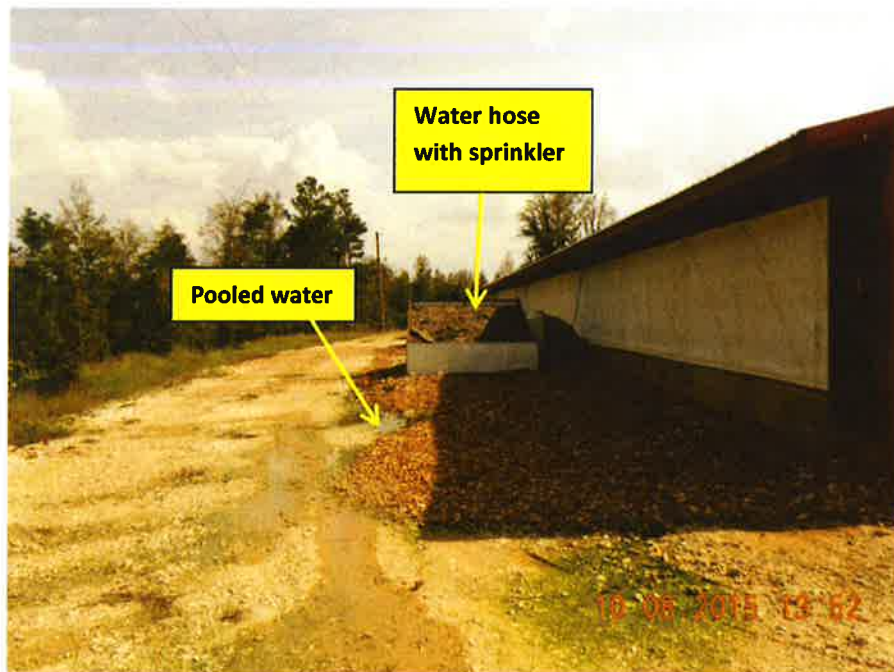
Picture 17

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of area down-gradient (east) of compost windrows. Picture was taken on east side of compost windrows facing east.



Picture 18

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of slope on northern side of pit barns. Silt fence is still installed in this area. Picture was taken standing on northeast side of pit barns facing west.



Picture 19

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of biofilter box used to improve air quality by reducing odor emitted from the pit exhaust fans. Producer indicated water in picture is freshwater from the sprinkler on the biofilter boxes. It is not leachate from biofilter box. Picture was taken standing on north side of pit barns facing east.





Picture 20

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of unstable areas located on western side of facility. Erosion control measures are still in place at facility. Picture was taken standing on west side of facility facing west.



Picture 21

Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of unstable areas located on western side of facility. Erosion control measures are still in place at facility. Picture was taken standing on west side of facility facing northwest.



**Picture 22**

**Date of Photo: 10/8/2015. Photo taken by: Kevin Smith. Location/Site Name: Dennis Yoder Facility/SOPC00283. TDWR personnel Present: Kevin Smith. Remarks: Picture is of unstable areas located on western side of facility. Erosion control measures are still in place at facility. Picture was taken standing on west side of facility facing southwest.**