



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 14<sup>th</sup> Floor  
Nashville, Tennessee 37243

September 12, 2018

Mr. John Pipkin  
Terra Renewal Services, Inc.  
15797 East Highway 155  
Dardanelle, AR 72834

RE: Permit-By-Rule for a Solid Waste Land Application Facility  
Terra Renewal Services – LND380000085, for fields JK-8 and JK-10  
Property Owner: Bradford Williams

Dear Mr. Pipkin

This letter will serve as official notice that this Division has approved your Permit-By-Rule notification for the referenced field JK-8 (88.2 acres), and field JK-10 (58 acres) located in Haywood County, TN (latitude 35°38'45" N/longitude -89°13'40" W), for land application of solid wastes from food processing facilities for soil amendment and agronomic benefit.

Prior to first application of solid wastes from food processing facilities, the Terra Renewal must provide a sampling plan per Rule 0400-11-01-.13(2)(c)9;

*The facility must submit a sampling plan for the periodic monitoring for waste materials, waste constituents in soil, and in surface waters. In this plan, the facility must propose a sampling frequency, proposed parameters and indicate the report format in which it will be submitted.*

Please note that this approval is only for the solid waste sources and application constraints listed in Attachment A attached to this document. Additionally the facility owner/operator must manage the residuals in accordance with the residual management plan submitted with the notification. The addition of any other facility operations or other waste streams must be approved in writing by this Division prior to land application at this site.

The registration number for this facility is LND380000085. This number should be used on all reports and correspondence to the Department or Division regarding this facility. Please be aware that an annual report is due on or before March 1st of each year. The recordkeeping and reporting requirements are found at Rule 0400-11-01-.13(2)(d) & (e).

Beginning July 1, 2019, there is an annual \$100.00 maintenance fee required [pursuant to Tennessee Rule 0400-11-01-.07(3)] for this land application site. You will receive an annual invoice from the Department's Division of Fiscal Services that will indicate Terra Renewal Services, Inc. owes \$100.00.

If you have any questions concerning this letter or decision, please contact Serena Broska of this office by email at [Serena.Broska@tn.gov](mailto:Serena.Broska@tn.gov) or call (615) 532-0876.

Sincerely,

  
Patrick J. Flood, P.E.  
Director

Attachments (1)

Cc: Bradford Williams, Property Owner  
Mr. David Coyle, Terra Renewal  
Clifton Jeter, DSWM/Jackson Environmental Field Office  
Fees, TDEC Fiscal Services  
Central Files, DSWM/Nashville Central Office

## **Attachment A – JK-8 and JK10**

### **Approved Land Application Sources:**

<b>Generator/ Facility, Location</b>	<b>Solid Wastes</b>	<b>Source</b>	<b>Collection</b>
Unilever - Covington, TN	Dairy	DAF	Skimmed Solids
Unilever - Covington, TN	Dairy	Spent/Off Spec Product	Holding Tank
Bongards Creameries – Humboldt, TN	Dairy	Spent/Off Spec Product	Holding Tank
ConAgra Foods- Humboldt, TN	Vegetables/ Chocolate	DAF	Skimmed Solids
Darpro Solutions - Memphis, TN	Grease Trap Residuals	Restaurant GTR	Grease Trap Interceptor
Water Valley Poultry – Water Valley, MS	Poultry	DAF	Skimmed Solids
Tyson Foods – Union City, TN	Poultry	DAF	Skimmed Solids
Tyson Foods (Sara Lee) – Newbern, TN	Pork	DAF	Skimmed Solids

### **Land Application Permit Constraints:**

1. All waste sources must be sub-surface injected or incorporated immediately in the event sub-surface injection is not possible.
2. The DSWM considers an application rate of 10,000 – 11,000 gallons/acre/day to be protective of human health and the environment.
3. No winter (December – April) applications permitted. Considerable portions of JK-8 (98%) and JK-10 (32%) contain soils unsuitable for winter applications due to shallow restrictive zones and seasonally high water tables. Note: Page 4 of Terra Renewal's residuals management narrative, Item IV (f) states that "Land application will not take place in an area having a minimum depth of less than 3 feet to the seasonal high water table".
4. Soil Sodium Adsorption Ratio (SAR), Electrical Conductivity (EC) and fertility testing should be included in the required annual report. Testing for metals should occur every five years at a minimum.
5. All boundaries as stated in Rule 0400-11-01.13(2)(b)5 shall apply including 100' to Nixon Creek and other field buffers (e.g., dwelling, road, etc.).