



ENVIRONMENTAL PROTECTION DIVISION

Date: Jul 15, 2024

Mr. Scott King
Managing Member
Erth Products Composting Facility
PO Box 3750
Peachtree City, GA 30269

Subject: **Permit Reissuance: 152-007P(CO)**
Erth Products LLC, Composting Facility
Webster County
5 Year Permit Review Approval

Dear Mr. King:

The revised Design and Operation Plan approved by the Georgia Environmental Division on April 19, 2024, included changes to the facility design. The facility design changes and current rule language require permit reissuance. Solid Waste Handling permit [152-007P(CO)] is attached and includes conditions and limitations for your operation. Personnel of the Georgia Environmental Protection Division will make periodic inspections of your operation. These inspections will be discussed with you or your designated representative.

This permit is now in effect; however, under Georgia law it is subject to appeal for a period of thirty (30) days following its issuance and is subject to modification or possible vacation if appealed. Should an appeal be received within the thirty (30) day appeals period, you will be immediately notified and further construction or operation under this permit may not be undertaken until such time as the appeals process is concluded.

If you have any questions regarding this permit, please contact Sarah Knapp at (470) 524-0632.

Sincerely,

Lena Sassone
Program Manager
Recovered Material and Abatement Program

Attachment: Permit with conditions

cc: Sarah Knapp; EPD Albany
File: Webster Co.- Erth Products-152-007P(CO)
S: Land\Landdocs\RMU\regulatedcommunity\permits\152Webster Co\Erth Products- 152-007P(CO)

Summary of Changes-Erth Products LLC, Composting Facility
152-007P(CO)

- Erth Products is a Class 4 compost facility located in Webster County at Bishop Johnson Circle Road, Plains, GA, on 29 acres.
- The Erth Products Composting facility was first permitted on April 13, 1989, to Green Gro Industries and then transferred to Erth Products on June 7, 1996.
- Feedstocks include a variety of organics, including biosolids and peanut hulls, pine bark and wood dust as bulking materials.
- Erth Products has a permit process limit of 100 tons/day of dry solids.
- Groundwater monitoring is required.
- The 5-year revised Design and Operation (D&O) Plan was approved on April 19, 2024.
- Permit conditions deleted to reflect the D&O Plan facility operating changes include:
 - The sediment pond and spray irrigation system for contaminated storm water is no longer operational. Rather than collecting stormwater in a sediment pond, the stormwater is bioremediated through vegetated sediment barriers. There is no point discharge of stormwater from the facility. This stormwater plan was previously approved in the D&O Plan on May 30, 2017.
 - The septic tank/drain field system for contaminated process water is no longer operational. All process water is collected in sumps throughout the facility and recirculated to either truck washing or the feedstock mixing area. There is no discharge of process water from the facility. The process water collection plan was previously approved in the D&O Plan on May 30, 2017.
 - Sludge from Miller Brewing Company is no longer accepted at the facility.
- Permit conditions added to reflect current compost rule language include:
 - Closure and financial assurance
 - Groundwater monitoring, reporting and corrective action
 - Detailed Odor Minimization Plan
 - Test standards and requirements
 - Record keeping
- There are no open enforcement actions.

PERMIT NO.: 152-007P (CO)

ISSUANCE DATE: Jul 15, 2024



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

LAND PROTECTION BRANCH

Solid Waste Handling Permit

Facility Name: **Erth Products LLC, Composting Facility**

Facility Address: **Bishop Johnson Circle Rd
Plains, Webster County, Georgia 31780**

Facility Location: **Latitude: 32.0258 degrees; Longitude: 84.4448 degrees**

In accordance with the provisions of the Georgia Comprehensive Solid Waste Management Act, and the Rules promulgated pursuant thereto, this permit is issued for the operation listed above.

All statements and supporting data submitted to the Environmental Protection Division (EPD) have been evaluated, considered and relied upon in the issuance of this permit. These documents have been assembled into an Operation Plan for the facility.

This permit to operate is conditioned upon **Erth Products LLC, Composting Facility** complying with the provisions of the Georgia Comprehensive Solid Waste Management Act, the Rules of Solid Waste Management (391-3-4-.16), adherence to the approved Operation Plan, and attached conditions of operation, which are hereby made a part of this permit.

This permit is now in effect; however, under Georgia law it is subject to appeal for 30 days following issuance and is subject to modification or revocation on evidence of noncompliance with any of the provisions of the Georgia Comprehensive Solid Waste Management Act or any of the rules promulgated pursuant thereto, or with any representation made in the abovementioned application or the statements and supporting data entered therein or attached thereto, or with any condition of this permit.



Jeffrey W. Cown

Jeffrey W. Cown, Director
Environmental Protection Division

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**CONDITIONS FOR SOLID WASTE HANDLING PERMIT
ERTH PRODUCTS COMPOSTING FACILITY**

SOLID WASTE HANDLING PERMIT: 152-007P (CO)

Page 1 of 5

1. This permit is valid for the location listed above and is not transferable to any other location.
2. Disturbance of wetland areas is prohibited except as permitted by the United States Army Corps of Engineers. The composting operation shall not be located within 50 feet of wetland areas.
3. No portion of the disposal area shall be located within 100 feet of any property line or enclosed structure.
4. The facility shall not be located in the 100-year floodplain.
5. The facility shall install and maintain adequate control measures to prevent discharge of pollutants from all compost ingredients, products and processes into waters of the State of Georgia or the United States.
6. All erosion control measures and/or diversion ditches shall conform to the Erosion and Sediment Control Act and be protective of ground and surface water. Stormwater runoff from disturbed areas not covered under an applicable National Pollutant Discharge Elimination System (NPDES) permit shall be controlled by use of appropriate erosion and sedimentation control measures or devices. Best management practices (BMPs) from the most recent edition of the Manual for Erosion and Sedimentation Control in Georgia shall be utilized.
7. The Design and Operation (D&O) Plan submitted by the Permittee and approved by the Division on April 19, 2024, is hereby made a part of this permit, and the facility shall be designed, constructed and operated in accordance with this Plan. Conditions of this permit supersede any provisions of the Plan which may conflict. Any changes in the design, construction, operation of the facility or any parts of the D&O Plan, must be submitted to and approved by the Division.
8. The operator of the facility shall keep the most recent copy of the approved D&O Plan readily available to personnel responsible for the daily operation and compliance of the facility.
9. The permittee may accept for composting, Category A, B and C feedstocks as defined within Solid Waste Rule 391-3-4-.16.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**CONDITIONS FOR SOLID WASTE HANDLING PERMIT
ERTH PRODUCTS COMPOSTING FACILITY**

SOLID WASTE HANDLING PERMIT: 152-007P (CO)

Page 2 of 5

10. Prior to the receipt of feedstocks, the Division shall be provided with written certification by a professional engineer licensed to practice in Georgia that the facility has been constructed in accordance with the permit and D&O plan and that necessary operable equipment to process feedstocks, rejects, contact water and compost is in place. An as-built survey of the facility, prepared by a Georgia-registered professional surveyor, shall be submitted with the engineering certification. These procedures shall be repeated for all subsequent construction of composting processing areas.
11. The permittee shall fully satisfy all applicable financial responsibility requirements for closure in accordance with Solid Waste Rule 391-3-4-.13, Financial Responsibility. The financial assurance mechanism shall be updated at least annually for inflation and for any modifications or phase development required and approved by the Division.
12. By the end of each operating day, all incoming Category B and C feedstocks shall be processed into the active composting area, transferred to leak-proof containment, or mixed with bulking material and covered in a manner that minimizes nuisance odors and scavenging by vectors. Prior to being incorporated into the active composting area, feedstocks with free liquid shall be mixed with drier feedstocks, bulking material, or compost so that the liquid is promptly absorbed and not allowed to flow from the mixing area.
13. The amount of unprocessed or in-process Category B and C feedstocks shall not exceed the amount covered by the facility financial assurance instrument and based upon the closure cost estimate in the approved D&O Plan. In-process Category B and C feedstocks include Category B and C feedstocks mixed with Category A feedstocks but not yet placed in active composting windrows and active composting windrows to reduce pathogens.
14. All loading and unloading of feedstocks shall be confined to the designated receiving areas as defined in the approved D&O Plan.
15. All trucks, equipment, and vehicles coming in contact with the sludge or compost material must be cleaned on the outside prior to leaving the site. Any trucks transporting sludge into the site must be equipped with a sealed tailgate capable of hauling wet sludge with no spillage and each load covered by a tarp capable of securing the material.
16. Non-compostable material and solid waste generated on site shall be stored in a waste container and then either recycled or disposed of at a permitted solid waste facility.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**CONDITIONS FOR SOLID WASTE HANDLING PERMIT
ERTH PRODUCTS COMPOSTING FACILITY**

SOLID WASTE HANDLING PERMIT: 152-007P (CO)

Page 3 of 5

17. Compost processing time and temperatures shall be sufficient to kill weed seeds, reduce pathogens and vector attraction, and produce compost that meets the stability necessary for the intended use in accordance with Solid Waste Rule 391-3-4-.16(5) (c) 4. (vi).
18. Storage of finished compost on site is limited to 12 months, unless approved by the Division on a case-by-case basis.
19. Suitable measures to prevent, control, and extinguish fires shall be applied.
20. A facility odor minimization plan shall be maintained and updated as stipulated in the following:
 - a. The odor impact minimization plan shall be revised and submitted to the Division for any major modification as described in Solid Waste Rule 391-3-4-.16 (7).
 - b. The odor impact minimization plan shall be reviewed annually by the operator to determine if any revisions are necessary.
 - c. The odor impact minimization plan and results of the odor monitoring shall be used by the Division to determine whether the facility is following the procedures approved in its permit and its design and operational plan.
21. The composting pad shall be maintained and repaired as needed. Cracks or other defects identified in the wearing surface shall be promptly repaired under the supervision of the facility manager. Any repairs or reconstruction of the layer limiting infiltration shall be completed under the supervision of a professional engineer, who shall prepare a report and certification of the repairs. A copy of the report(s) shall be maintained in the facility's operating records. Compost materials shall not be placed in areas with damage to the infiltration layer, and berms or other diversions shall be installed to prevent run-on of contact water into these areas.
22. Facilities that compost biosolids or sewage sludge shall comply with all applicable federal regulations regarding sludge management at 40 CFR 501; 40 CFR 503; and 40 CFR 503, Subpart B.
23. Access to the facility shall be limited to authorized entrances and shall be closed when the facility is not in operation. An all-weather access road to the composting facility shall be maintained at all times.

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**CONDITIONS FOR SOLID WASTE HANDLING PERMIT
ERTH PRODUCTS COMPOSTING FACILITY**

SOLID WASTE HANDLING PERMIT: 152-007P (CO)

Page 4 of 5

24. The composting facility shall have a sign at its entrance that lists the name of the facility, permit number, days and hours of operation, feedstocks accepted, and emergency contact information.
25. Site survey control shall be provided and maintained to ensure compliance with the approved D&O Plan.
26. Operation and management shall be under the supervision and control of an individual properly trained in the operation of such facilities at all times. Facility operations managers must be able to document training in the basics of composting facility operations.
27. The owner shall operate the facility at all times in such a manner as to prevent air, water, and land pollution as well as public health hazards and nuisances and in accordance with all other applicable Local, State and Federal rules, regulations and ordinances at all times. The facility owner or operator shall control vectors, nuisance odors and dust to protect public health and welfare.
28. Test standards and requirements shall conform to Solid Waste Rule 391-3-4-.16(8) Testing, of the Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-4 Solid Waste Management.
29. The Permittee shall maintain the groundwater monitoring system and monitor the groundwater in accordance with the approved Groundwater Monitoring Plan and the Rules for Solid Waste Management, Chapter 391-3-4-.14. Changes to the groundwater monitoring system may be required under the Rules for Solid Waste Management, Chapter 391-3-4-.14, as requested and/or approved by EPD. Such changes may be due to changing potentiometric conditions and evaluation of groundwater monitoring data.
30. The Permittee shall initiate an assessment of corrective measures as specified in the Rules for Solid Waste Management, Chapter 391-3-4-.14, if an Appendix IV constituent has been detected at a statistically significant level exceeding the groundwater protection standard or conditions indicate a threat to human health or the environment as determined by the Director. Based on the results of the assessment of corrective measures, the Permittee must select an interim measure (if applicable) and/or remedy as specified in the Rules for Solid Waste Management, Chapter 391-3-4-.14. Upon concurrence by the Division, the selected interim measure and/or remedy must be implemented in accordance with the Rules for Solid Waste Management, Chapter 391-3-

**STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION**

**CONDITIONS FOR SOLID WASTE HANDLING PERMIT
ERTH PRODUCTS COMPOSTING FACILITY**

4-.14. The Permittee shall demonstrate that the remedy is complete through submittal of a written certification provided by a professional geologist or engineer registered in Georgia.

SOLID WASTE HANDLING PERMIT: 152-007P (CO)

Page 5 of 5

31. Records shall be maintained to track incoming feedstocks and finished compost. By September 1 of each year, operators shall submit a report to the Division that includes the weight or volume (in tons or cubic yards) of the feedstocks accepted, total compost produced, and any amount sold or used in the previous fiscal year (July 1 - June 30).
32. The incoming municipal biosolids and resulting compost must be sampled and analyzed monthly for metals: Cadmium, Lead, Zinc, copper, Mercury, and Iron and organics: PCB, Endrin, Lindane, Methoxychlor, Toxaphene, 2,4-D, 2,3,5-T Silvex. The results of these analyses must be reported monthly to the Division.
33. Records documenting compliance of the composting facility with these Rules shall be kept for a minimum of three years in a form suitable for submission to or inspection by the Division. Records shall be retained at the composting facility unless an off-site storage location is approved by the Division.
34. Only sludge from generators which have been approved and are subject to inspection by the Environmental Protection Division may be processed at this facility. A record of sludge generators must be maintained and reported monthly to the Division.
35. No unfinished compost may be distributed from the facility.
36. The composting facility shall be closed in accordance with Solid Waste Rule 391-3-4-.11.

Copy of permit
issued June 7, 1996

webster
Georgia Department of Natural Resources

Environmental Protection Division
Commercial & Industrial Solid Waste Program
4244 International Parkway, Suite 100, Atlanta, Georgia 30354
Lonice C. Barrett, Commissioner
Harold F. Reheis, Director
(404) 362-2692

June 7, 1996

FILE

Mr. W.E. King, Sr.
ERTH Products, LLC.
P. O. Box 3750
Peachtree City, Georgia 30269

RE: Solid Waste Handling Permit
ERTH Products, LLC.
Webster County

Dear Mr. King:

In accordance with the Rules for Solid Waste Management, please find enclosed a copy of Solid Waste Handling Permit Number 152-007 P(Co), issued for the transfer of ERTH Group, Inc. to ERTH Products, LLC., bio-solids composting facility located on County Road 61 in Preston, Georgia.

If you need additional information concerning this matter, please contact Harold Gillespie at (404) 362-2692.

Sincerely,

James W. Dunbar
James W. Dunbar
Program Manager
Solid Waste Permitting Program

JWD:mbb

Enclosure

cc: Southwest Georgia Regional Office
File (PER/Webster Co./ERTH Products) ✓



State of Georgia
Department of Natural Resources
ENVIRONMENTAL PROTECTION DIVISION



SOLID WASTE HANDLING PERMIT

Permit No: 152-007P (Co)

Date: June 7, 1996

Permittee: Name: **ERTH Products, LLC.**

Address: 402 Line Creek Parkway
Peachtree City, Georgia 30269

In accordance with the provisions of the Georgia Comprehensive Solid Waste Management Act, and the Rules promulgated pursuant thereto, this permit is issued for the following operation:

Webster County - ERTH Products, LLC., CR 61 Processing (Bio-solids Composting)

This permit is conditioned upon the permittee complying with the attached conditions of operation, which are hereby made a part of this permit.

All statements and supporting data submitted to the Environmental Protection Division of the Department of Natural Resources have been evaluated, considered and relied upon in the issuance of this permit.

This permit is now in effect; however, under Georgia Law it is subject to appeal for thirty (30) days following issuance, and is subject to modification or revocation on evidence of noncompliance with any of the provisions of the Georgia Comprehensive Solid Waste Management Act, or any of the Rules promulgated pursuant thereto; or with any representation made in the above mentioned application or the statements and supporting data entered therein or attached thereto; or with any condition of this permit.

Harold F. Reheis, Director
Environmental Protection Division

Permit No: 152-007P (Co)

**Issued to: EARTH Products, LLC.
Webster County**

Conditions for Composting Operation:

1. All trucks, equipment, and vehicles coming in contact with the sludge or compost material must be cleaned on the outside prior to leaving the site.
2. All wash water and process water must be channeled through the septic tank/drain field system.
3. All storm water runoff from the process area must be channeled to the storm water retention pond. Any overflow from this pond must be directed to the spray irrigation system.
4. No wash water, process water or contaminated storm water runoff shall be allowed to leave the EARTH Products, LLC. property or enter any waters of the State.
5. Any trucks transporting sludge into the site must be equipped with a sealed tailgate capable of hauling wet sludge with no spillage and each load covered by a tarp capable of securing the material.
6. The entire composting process shall be operated in a manner to prevent nuisance odors and to control dust.
7. All sludge and compost must be contained on the paved area.
8. Diversion ditches shall be constructed to channel surface runoff away from the concrete pad.
9. Limited access capable of restricting vehicular traffic must be provided when personnel are not on the site.
10. Appropriate signs must be erected denoting the nature of the operation and restricting access to authorized personnel.
11. Individual aerated piles must be monitored daily for temperature to insure effective pathogen elimination. Records of these temperature measurements must be maintained onsite for review by Division representatives conducting inspections.

Permit No: 152-007P (Co)

**Issued to: ERTH Products, LLC.
Webster County**

12. The incoming municipal sludge and resulting compost must be sampled and analyzed monthly for metals: Cadmium, Lead, Zinc, copper, Mercury, and Iron and organics: PCB, Endrin, Lindane, Methoxychlor, Toxaphene, 2,4-D, 2,3,5-T Silvex.

The incoming sludge from Miller Brewing Company and resulting compost must be sampled for the above constituents and the following:

1,1, 1-trichlorethane
Methyl Ethyl Ketone
4 Methyl Z pentanone
Acetone
Toulene
Ethyl Benzene

The results of these analyses must be reported monthly to the Division.

13. Only sludge from generators which have been approved and are subject to inspection by the Environmental Protection Division may be processed this facility unless such sludge is handled in accordance with the provisions of the O.C.G.A. 12-8-44. A record of sludge generators must be maintained and reported monthly to the Division.
14. This operation is limited to 100 tons per day of dry sludge.
15. This permit shall null and void one year from the effective date if the permitted composting operation has not commenced within one year from the effective date.