



October 1, 2019

Gary Chamness
President
Chamness Technology, Inc.
2255 Little Wall Lake Road
Blairsburg, IA 50034

Notice of Violation: Specifications of Compost Facility Operations Plan
567 Iowa Administrative Code (IAC) Chapter 105.3(5)

Subject: Compost Complaint Investigations
Facility #90-SDP-10-97P-COM
Field Office Compliance Database Complaint Number:
#27291 - filed 8/27/19 - runoff
#27365 - filed 9/16/19 - fires and compost burial
#27375 - filed 9/16/19 - smoke and odor
#27440 - filed 9/10/19 - plastic bags in final compost
#27442 - filed 9/24/19 - plastic bags in final compost

Dear Mr. Chamness:

Chamness Technology Inc.'s Eddyville Iowa facility, located at 24820 160th Street, Eddyville, Iowa, has been out of compliance with the above mentioned Compost Permit and associated Operations Plan, since mid-2018. Violations of the Compost Permit and associated Compost Facility Operations Plan are summarized below:

The following items outline current deficiencies with Chamness' Operations Plan which has been incorporated into Compost Permit No. 90-SDP-10-97P-COM and IAC Chapter 105:

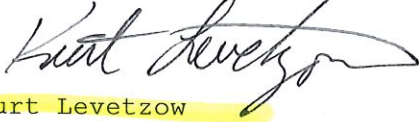
1. Section B.1 Compost Row Building & Management:
▶Windrows have not been utilized in at least one year based on documented observations of the site since October 2018.
2. Section B.3 - Aeration of Compost:
▶Aeration, a vital component of proper composting, has not been possible due to the absence of windrows on the operating pad.
3. Section B.4 - Pathogen Reduction, Temperature and Time Control:
▶Internal compost temperature readings have not been obtained since windrows have not been maintained.
4. Section B.5a - Management of Odors (Windrows):
▶As stated above, windrows have not been maintained since prior to fall of 2018.
5. Section B.5e - Good Housekeeping:
▶Compost and compost feedstocks have migrated off the pad, hot spots creating smoke and ponding of leachate on the compost pad are creating conditions that are impeding proper composting operations.
6. 567 IAC 105.3(5) states that composting must be done on an all-weather surface of compacted soil, compacted granular aggregates, asphalt, concrete or similar relatively impermeable material that will permit accessibility during periods of inclement weather and prevent contamination of surface water and groundwater.
▶Compost has migrated off portions of the pad and has recently been moved back onto the pad in all areas, except for the eastern edge of the compost pad.

FIRES: Two complaints were filed with DNR Field Office 6 on September 16, 2019, stating concern of smoke from fires within the compost. Onsite investigations determined that improper mixing of Diatomaceous Earth (DE) has led to smoking and smoldering conditions. DNR Solid Waste staff are looking into the legality of managing/disposing of DE via composting in the future.

Due to the duration of non-compliance, as well as the water quality violations from the unpermitted discharge on August 27, 2019, this matter will be referred to DNR Legal Services Bureau for additional enforcement action and corrective action.

If you have any questions or would like further explanation of any part of this letter, please contact me in this office at 319-653-2135 or at kurt.levetzow@dnr.iowa.gov.

Sincerely,
FIELD SERVICES & COMPLIANCE BUREAU



Kurt Levetzow
Environmental Specialist Senior

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xc: Becky Jolly, IDNR Solid Waste Section, via email
Chamness SDP File