Dovetail
ENERGY

12/12/16

Betsy VanWormer
Environmental Engineer II
Division of Surface Water
50 W. Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Dovetail Energy, LLC Notice of Violation

Dear Ms. VanWormer

The following is in response to the Notice of Violation that was received on December 6, 2016 regarding land application violations that occurred on November 29, 2016. The findings stemmed from a complaint that stated concerns about biosolids being applied too close to the well located at 4505 Byron Road Fairborn, Ohio 45324.

Biosolids, despite being injected, were pooled around the southwest corner of Ohio EPA site 29-00184 (GRQ-00184), within the 300 ft buffer area designed for surface applied biosolids, which prompted the complaint from a local resident. From this occurrence, other findings arose including a lack of signage, application in unauthorized land, and further pooling of biolsolids around the disconnect in the dragline. Fields that were in were in question include 29-00183, 29-00184, 29-00432, and 29-00433 (GRQ-01-08, GRQ-01-08, GRQ-06-01, GRQ-06-02, respectively).

Attached you'll find a corrective action request form, approved by management, which will remedy the violations described above. In addition to the attached corrective action sheet, adjustments in our land application process, specifically on oversight of both Dovetail Energy applicators and 3rd party contractors, will be adopted. Signage records, dragline monitoring records, and properly completed daily operator logs will be more stringently controlled to eliminate future actions of this kind.

Dovetail Energy, LLC will always be an advocate in the defense of our natural resources. The changes above will further our capabilities to protect the environment and improve our land application operations. Please review these changes at your earliest convenience.

Thank you,

Taylor Faecher
Environmental Compliance Specialist

Dovetail
ENERGY

Standard Dragline Operating Procedure

Dovetail
ENERGY

Dovetail Energy Dragline Standard Operating Procedures

One of the risks associated with dragline systems is a break or leak in the line, resulting in the potential spill of manure/biosolids. Temporary lines may be used to cross roads to service fields; culverts may be used to facilitate this crossing. To minimize the risk associated with a spill from a temporary line that crosses a road ditch or culvert, ensure there are no connections near the culvert or ditch, and if possible, use a single length of hose.

Risers, hoses, and connectors are;

1. Inspected for leaks and breaks right after assembly and at startup of each use;
2. Monitored for leaks during use and application;
3. Operated with trained staff, connected with two-way communication or cell phones at all times;
4. Fitted with connection that can withstand all likely conditions, such as head pressure from the pump and stress from pulling on draglines;
5. Flushed with air to clean out hoses before moving to a different location

Try to minimize even minor loses of manure/biosolids during application. In the event of excessive spillage, clean-up measures, such as sweeping, scrapping, shoveling, or vacuum pumping may be required.

Dovetail
ENERGY

NOV Action Summary

Dovetail
ENERGY

Dovetail NOV Actions Summary

1. Biosolids were present on the surface of an unpermitted field
    a. **Review with operator standard dragline operating procedure. Also, permit the affected field as it lies between two already permitted fields.**

2. Liquid biosolids surface applied despite the intent to inject
    a. **Review with the operator the need to insure complete biosolid injection. Also, investigating and reviewing alternative/improved methods to insure proper injection.**

3. Biosolids were pooled where dragline was disconnected
    a. **Review with operator standard dragline operating procedure. Altered the daily operator log to include inspections along the dragline.**

4. Biosolids were applied approximately 100 feet from residential well.
    a. **Review with the operator the need to insure complete biosolid injection. Also, investigating and reviewing alternative/improved methods to insure proper injection.**

5. Beneficial use signs have not been posted at sites.
    a. **Review with operator need to insure signage is posted 7 days prior to application. Review and revise land application checklist to add placement of signage prior to application (ENV-012).**

Dovetail
ENERGY

Land Application Checklist

Dovetail ENERGY

Land Application Checklist and Documentation

Land App Checklist

Pre-Land Application

- ☐ Consent Forms
- ☐ Maps
- ☐ ARC
- ☐ Soil Tests up to date
- ☐ Signs posted at least a week before application
- ☐ Buffer flags placed

At Time of Application

- ☐ Daily Effluent Route logs (ENV-016)
- ☐ Operator Daily logs (ENV-017)
- ☐ Weather report
- ☐ Calibration logs

Post-Land Application

- ☐ Effluent Sample Sent
- ☐ ARC
- ☐ CPLR (ENV-021)
- ☐ Land Application Log/Billing (ENV-022)

Monthly/Yearly Reporting

- ☐ eDMR
- ☐ Annual Sewage Sludge Report

Dovetail
ENERGY

Updated Daily Operator Logs

Dovetail
ENERGY

Renergy Land Application Operator Daily Log

Site #: _____ Date: _____

Hours of Operation: _____ am/pm to _____ am/pm

Weather Conditions: _____

Are signs posted?	Yes	No	Buffers Flagged?	Yes	No
Does the field have drainage tiles?	Yes	No			
Are tile outlets plugged?	Yes	No			

Inspected for suitable risers, hoses, and connectors at:	Start up	In process	End day/field

Method of application?	Surface application	Injection

Next year's crop: _____

Application rate per acre: _____

Number of loads to site: _____

Gallons applied to this site on this date: _____

Approximate acres applied on this date: _____

Notes: _____

Operator Name: _____

Operator Signature: _____

Renergy Employee Signature: _____

Dovetail
ENERGY

Pictures

Dovetail
ENERGY

Dovetail
ENERGY

Dovetail
ENERGY

Dovetail
ENERGY

Dovetail
ENERGY