



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

Solid Waste Section

June 01, 2015

Kent and Brenda Coble
Coble's Sandrock, Inc.
5833 Foster Store Road
Liberty, NC 27298

Re: Third Comments on the Permit Amendment Application for a Five-Year Permit Review
Coble's Construction and Demolition Debris (C&D) Landfill
Alamance County, North Carolina
Permit No. 0105-CDLF-1998, Doc ID No. (DIN) 24420

Dear Mr. & Ms. Coble:

The operations of the following solid waste management activities/areas that are identified in the Audit Report (enclosed) are not described in the Operations Plan approved on February 19, 2009 (DIN 4862):

1. Land cleaning debris and clean wood grinding operation
2. Engineering wood grinding operation
3. Concrete crushing operation
4. Old land clearing and inert debris landfill mining operation
5. Soil mixed with wood screening operation

Pursuant to North Carolina Solid Waste Management Rule 15A NCAC 13B .0537(b)(1), <http://portal.ncdenr.org/web/wm/sw/rules/ruleelist>, Coble's Sandrock, Inc. must describe these additional solid waste management activities/areas in the revised the Facility Plan or Operations Plan including drawings (if the operation activity/area is not located in/adjacent to the working face of the C&DLF, but inside the landfill facility/property boundary). In general, the descriptions of each activity/area in the plan must include, but not limited to, the following information:

1. Identify the waste stream that is recovered material or recyclable as defined in North Carolina General Statute (NCGS) 130A-209.(a)(24) & (26), respectively.
2. The recovered material or recyclable must be operated according to NCGS 130A-309.05(c). The recovered material or recyclable at the facility must be sold, used or reused **within one year**.

3. Identify the location or area that the described waste recycled/recover activity is conducting and where the temporary stockpiles of the recovered material are located. For the management of waste stockpiles, the plan must describe, but not limited to:
 - i. The maximum quantity (tonnage or volume) of the stored recycled/recover material at each area at any day.
 - ii. The manageable size of each stockpile (maximum height and lateral extent). If the recovered material/recyclable is stored in a container (such as roll-off box), please state the container sizes.
 - iii. The implementation of fire prevention including maintaining the minimum 25-foot fire isle between each stockpile of flammable or combustible recyclable/recovered material. The reasonable isle distance between each stockpile must be maintained all the time for accessing equipment or machinery for material handling, and, transporting, & management.
4. Description of the machinery and/or equipment used for treatment and processes at each activity and the ownership and responsibility to operate & maintain the described machinery and/or equipment?
5. Descriptions of dust, wind-blown litter, and odor control measures.
6. The approved waste screen program (DIN 4862) must be conducted to ensure the non-conformance wastes can be properly disposal off at the C&DLF or approved solid waste management facility at the conclusion of each operating day.
7. For the area utilizing for mobile home destruction, the existing Operation Plan must be revised by adding the requirements stated in the Franchise Agreement with Alamance County (regarding disposal ban of the asbestos-containing material at the Coble's C&DLF) and the SWS guidance document (see enclosed document).
8. For the old land clearing and inert debris landfill (LCIDLF) mining operation, in addition to the general info of the operation stated in Items 1 through 5, please provide a landfill reclamation plan including the following minimum info; the plan can be appended to the Operations Plan.
 - i. What is status of the described LCIDLF? Active or closed one? What is the name and the Permit No/ or Notification No. of this disposal unit? What is the size of this disposal unit (greater or less than two (2) acres)? What are the proposed limits (acreages) of the LCIDLF planned for the waste reclamation?

- ii. Where is the described LCIDLF located? The location must be added to the Facility and Operation Plan drawings.
 - iii. What are the purposes for the reclamation of the LCIDLF? And waste streams are reclaimed from the LCIDLF?
 - iv. Descriptions of the purposes or objectives and the typical processes of the waste reclamation from the beginning - waste excavation sequence - from the side to the side or the top to the bottom of the landfill), wastes or soil screening/separation processes, material/waste handling and sorting/processing, to the end - stockpile recovered material & disposal of non-conformance waste.
 - v. Ventilation and monitoring the potential methane or other explosive gases emission from the reclaimed LCIDLF must be addressed to protect the operators and to prevent a fire.
 - vi. Descriptions of odor and wind-blow litter control measures.
 - vii. How to manage the nonconformance wastes? (such as disposal of these wastes in the LCIDLF or C&DLF?)
 - viii. Descriptions of the LCIDLF closure, restoration, and/or post-closure (including land use) plans after the reclamation project is completed.
 - ix. Leachate generation and management must be addressed in the course of wastes reclamation. The implantation of best management practices (BMPs) to avoid the wastes exposed to or in the standing water due to run-off and/or run-on during the course of reclamation of the LCIDLF.
 - x. Document/record the amount of reclaimed wastes (this is optional; data may be useful in the future for tax credit if a related law passes).
9. For concrete crushing operation area, the audit report indicated the concrete stockpiles are located in the future C&DLF - Phases 4 & 5 areas. In addition to the general info of the operation stated in Items 1 through 4, please add the locations to the Facility Plan and Operations Plan drawings.
10. The Audit Report indicates a LCIDLF, Notification No. N0144 is located inside the landfill property (the future C&DLF – Phase 4 area). Please provide the following info:

- i. What is the status of this LCIDLF, active or closed one? Is this the same LCIDLF which is subjected to aforementioned landfill reclamation?
 - ii. Please provide the copy of the LCIDLF application because the landfill approval documents are not available in the SWS file system. If it is active one, the application must be recorded in the Alamance County Office of Deed. If the landfill is closed, the closure certification must be recorded in the Alamance County Office of Deed.
 - iii. Please add the landfill to the facility plan.
 - iv. This LCIDLF is located in the future C&DLF disposal area (Phase 4) according to the Audit Report. For the record, if the LCIDLF is not subjected to removal/ or complete reclamation prior to constructing the future Phase 4, the PTC Application – Phase 4 must be revised to comply with Rule 15A NCAC 13B .0540(1)(d). The gross capacity, waste limits, and groundwater monitoring system related to C&DLF operations may be subjected to modification.
11. According to the enclosed Audit Report and recent e-mail commutations, Coble's Sandrock, Inc. will not conduct compost operation and sheetrock panel recovery/grinding operation at the C&DLF. Please add this decision to the revised Operations Plan.

Please respond the above-mentioned comments and provide the Solid Waste Section (SWS) a hard copy and an electronic copy of the revised Operations Plan and drawings for review and approval. The SWS appreciate your cooperation on this matter. Please contact myself if you have any questions or requests for further clarifications on these comments.

Sincerely,



Ming-Tai Chao, P.E.
Environmental Engineer
Division of Waste Management, NCDENR

cc:

Hannu Kemppinen, P.G. Joyce
Elizabeth Werner, DWM
John Patrone, DWM

Ed Mussler, Permitting Branch Supervisor
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Central Files

Enclosures