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Backus	09/05/2014	21715	3212-TRANSFER-1999



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

Pat McCrory
Governor

John E. Skvarla, III
Secretary

September 5, 2014

Mr. Bruce Woody
City of Durham, Solid Waste Management Department
101 City Hall Plaza
Durham, NC 27701

Subject: Permit Application Review
City of Durham Transfer Station
3212-TRANSFER-1999, Durham County, Document ID No. 21715

Dear Mr. Woody:

On August 20, 2014, the Division of Waste Management, Solid Waste Section (Section) received an application for a construction of a new transfer station building (DIN 21656 and 21657) which will replace the existing building and expand the facility and operations of the transfer station.

An initial technical review of the application has been completed. Please review the following comments and questions concerning the application. Modify the application where appropriate.

1. Last sentence in the first paragraph of cover letter. – For fee purposes, the Section considers the application a substantial amendment to the permit rather than a modification and is subject to the fee for a new permit application as stated in NCGS 130A-295.8.
2. The application contains several references to Rule .0505 Operational Requirements for Sanitary Landfills. Since this a transfer station, I do not understand why these rules are referenced rather than specific transfer station rules or general rules that apply to solid waste management facilities. For example, Rule .0402(3) concerns leachate and its treatment for transfer station operations as opposed to Rule .0505(7) (c) concerning leachate and its treatment which applies to sanitary landfill operations.
3. Section 2.4 Prohibited Wastes – Similar to comment 2. The reference is to Rule .0505 about wastes. I believe you may have this to prevent acceptance of waste for transfer that the disposal facility cannot accept. However, the North Carolina municipal solid waste (MSW) landfills you identify in the plan (82-02 and 62-04) are permitted under the 1600 Rules, not the 500 Rules. *(See Rule .0501(b). The requirements of this Section shall not apply to municipal solid waste landfill units, which are defined under and subject to the requirements of Seciton.1600 of this Subchapter.)*

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4. Future Use of Transfer Station - The future use of the original transfer station does not seem clear. The operation described in Section 9.1 through 9.4, processing curbside and commercially collected comingled recyclables, does not require a permit. However, the operation described in 9.4 does require a permit. It would be a separate permit and separate operation plan. The permitting can be included under this application fee (no additional fee); however, it would be subject to a separate annual transfer station fee (\$750).
5. Dual Use of New Transfer Station –Section 1.0 Introduction (page 5) states the possible dual use of the station for the separate transfer of MSW and C&D (MSW on one loading pit and C&D on the other.) The operation plan does not address how this would be done to keep the waste separate or identify the C&D landfills or processing facilities that waste would use. This needs to be included in the operation plan in order to be included in this permit. Otherwise you will need to submit an additional request and may be subject to an additional permitting fee.

If you have any questions, please contact me at (919) 707-8257 or by email at pat.backus@ncdenr.gov.

Sincerely,

Patricia M. Backus, P.E., Environmental Engineer
Division of Waste Management, NCDENR

cc: John Barnard, P.E., Barnard Engineering, P.C.
Bill Davidson, Waste Industries
Ed Mussler, P.E., Permitting Branch Supervisor
Jason Watkins, Western District Supervisor
John Patrone, Environmental Senior Specialist